



GAIL FARBER, Director

**COUNTY OF LOS ANGELES
DEPARTMENT OF PUBLIC WORKS**

"To Enrich Lives Through Effective and Caring Service"

900 SOUTH FREMONT AVENUE
ALHAMBRA, CALIFORNIA 91803-1331
Telephone (626) 458-5100
<http://dpw.lacounty.gov>

ADDRESS ALL CORRESPONDENCE TO:
P.O. BOX 1460
ALHAMBRA, CALIFORNIA 91802-1460

IN REPLY PLEASE
REFER TO FILE

October 25, 2016

The Honorable Board of Supervisors
County of Los Angeles
383 Kenneth Hahn Hall of Administration
500 West Temple Street
Los Angeles, California 90012

Dear Supervisors:

ADOPTED

BOARD OF SUPERVISORS
COUNTY OF LOS ANGELES

22 October 25, 2016

LORI GLASGOW
EXECUTIVE OFFICER

**CONSTRUCTION-RELATED CONTRACT
PUBLIC BUILDING CORE SERVICES AREA
PROPOSED MIRA LOMA WOMEN'S DETENTION CENTER PROJECT
CERTIFY THE FINAL ENVIRONMENTAL IMPACT REPORT
ADOPT THE MITIGATION MONITORING AND REPORTING PROGRAM
APPROVE THE PROJECT
DELEGATE AUTHORITY TO SIGN AGREEMENTS WITH THE STATE
AWARD CONSULTANT AGREEMENTS
SPECS. 7266; CAPITAL PROJECT NO. 69719
(SUPERVISORIAL DISTRICT 5)
(3 VOTES)**

SUBJECT

Approval of the recommended actions will certify the final Environmental Impact Report for the proposed Mira Loma Women's Detention Center project in Lancaster; adopt the Mitigation Monitoring and Reporting program and environmental findings; approve the project; authorize the Chief Executive Officer or her designee to execute agreements related to the State grant for the proposed project; authorize the Director of Public Works or her designee to execute easements, permits, and utility agreements for the proposed project; and authorize the award of consultant services relating to project management/construction management and project controls/support services.

IT IS RECOMMENDED THAT THE BOARD:

1. Certify that the final Environmental Impact Report for the proposed Mira Loma Women's Detention Center project has been completed in compliance with the California Environmental Quality Act and reflects the independent judgment and analysis of the County; find that the

Board has reviewed and considered the information contained in the final Environmental Impact Report prior to approving the project; adopt the Mitigation Monitoring and Reporting program, finding that the Mitigation Monitoring and Reporting program is adequately designed to ensure compliance with the mitigation measures during project implementation; and determine that the significant adverse effects of the project have been reduced to an acceptable level as outlined in the Environmental Findings of Fact, which findings are adopted and incorporated by reference.

2. Approve the Mira Loma Women's Detention Center project; authorize the Chief Executive Officer or her designee to execute the agreements required to obtain the grant funds from the Local Jail Construction Financing Program (State Assembly Bill 900, Statutes of 2007) in substantially the same form as the draft agreements, with modifications necessary to conform these form agreements to the Mira Loma Women's Detention Center project.
3. Delegate authority to the Director of Public Works or her designee to execute any easements, permits, and utility connection agreements necessary for the completion of the project or for the execution of the State grant funding agreements.
4. Award a consultant services agreement to Building Mira Loma Joint Venture to provide project management/construction management services for the Mira Loma Women's Detention Center project for a \$4 million not-to-exceed amount, and authorize the Director of Public Works or her designee to execute the agreement. The term of this agreement will commence upon the full execution of the agreement and shall terminate upon final acceptance by the County.
5. Award a consultant services agreement to Mira Loma Project Controls, LLC, to provide project controls/support services for the Mira Loma Women's Detention Center project for a \$2 million not-to-exceed amount, and authorize the Director of Public Works or her designee to execute the agreement. The term of this agreement will commence upon the full execution of the agreement and shall terminate upon final acceptance by the County.

PURPOSE/JUSTIFICATION OF RECOMMENDED ACTION

Approval of the recommended actions will certify the final Environmental Impact Report (EIR) for the Mira Loma Women's Detention Center (MLWDC) project; adopt the Mitigation Monitoring and Reporting Program (MMRP) environmental findings; approve the MLWDC project; authorize the Chief Executive Officer (CEO) or her designee to execute the agreements required under the State grant guidelines for the MLWDC project; enable the Director of Public Works or her designee to execute easements, permits, and utility agreements for the proposed project; and award consultant services agreements for project management/construction management and project controls/support services. The recommended actions are consistent with the AB 900 Grant requirements applicable to the proposed MLWDC project in Lancaster and the Board direction on this proposed project. Once the design-build contractor procurement process has been completed pursuant to the design-build policy previously adopted by the Board, we will return to the Board with a recommendation to award a design-build contract to the selected design-builder.

MLWDC Project Background

In March 2012, the Board of State and Community Corrections (BSCC) conditionally awarded

\$100 million in AB 900 Grant funds to the County to develop a 1,156-bed female detention facility at Pitchess Detention Center in Castaic.

On November 14, 2013, the BSCC approved the County's request to relocate the proposed 1,156-bed female detention facility from Pitchess Detention Center to the existing detention facility at Mira Loma in Lancaster. On January 16, 2014, the BSCC approved the revised project scope, budget, and schedule, which included the addition of 448 transitional housing beds to yield a higher total bed capacity of 1,604 beds.

The County has since been working to meet the milestone requirements for the AB 900 Grant funding program, which includes the development of the program, scoping documents, a conceptual site plan, a project cost estimate, and a schedule. On August 17, 2015, the State approved the County's submission to establish the project under the AB 900 guidelines, effectively enabling project costs to be eligible for future reimbursement.

MLWDC Scope

The repair and refurbishment of the existing Mira Loma detention facility for housing eligible low and medium security female inmates will include renovation of the existing campus and buildings, including refurbishment of the housing units, kitchen, administrative buildings, and site infrastructure including code compliance upgrades required by the AB 900 Grant program. New construction will consist of a medical clinic, inmate processing area, visitor reception building, transitional housing, and warehouse storage.

During the project scoping process, items were included in the project to address jurisdictional agencies requirements and help facilitate operational, programmatic services, and gender responsive elements. These items include a dedicated building with contact and non-contact visiting; modernization of facility technology (including video visitation, perimeter security, and surveillance systems); replacement of kitchen equipment; connection to the County water services; and emergency power backup capacity to cover 100 percent of the facility.

State Agreements

In order to proceed through the State's grant funding process, the County must complete specific State required tasks. As part of these tasks, AB 900 Capital Outlay and State Public Works Board Guidelines require six agreements (Enclosures A through F) to be executed between the State and the County:

- BSCC Jail Construction Agreements (Design-Build) – sets forth the roles, responsibilities, and performance expectations of the parties for the construction of the jail facility.
- Project Delivery and Construction Agreement (Design-Build) – to establish the project and obtain the resolution authorizing interim financing of the project from the State Public Works Board.
- Ground Lease – to establish the legal metes and bounds of the project, and lease the site to the State.
- Easement Agreement – to grant access for utilities and repair.
- Right of Entry for Construction – to allow the State to give the County the right to enter the site to construct the facility.
- Facility Sublease - to establish the conditions of the sublease of the facility back to the County.

Approval of the recommended actions will allow the County to conduct discussions with the State to negotiate and modify the agreements to reflect the Mira Loma site, execute the resulting final agreements, and seek the State's concurrence to release the design build Request for Proposals Part B: Technical and Cost Proposal. The Part A Request for Statement of Qualifications Questionnaire does not require State concurrence and will proceed pursuant to the design-build policy previously approved by the Board.

Proposed Design and Construction Method

The proposed delivery method for the MLWDC project is design-build. Pursuant to the design-build policy previously adopted by the Board, a design-build request for proposals will be developed for solicitation of proposals for design and construction of the project and will be released in two parts, Part A, Statement of Qualifications and Part B, Technical and Price proposal. Part B will be released upon determination of qualifying Part A proposers and upon compliance with AB 900 guidelines required by the State. The Department of Public Works will then seek the Board's approval to execute a design-build agreement with the selected design builder. Consistent with the Board-adopted design-build policy, stipends of \$150,000 will be provided to the second and third highest ranked qualified proposers that are not selected as the best-value design-builder (or top three highest ranking qualified proposers if no design-build contract is awarded) via consultant services agreements, giving the County the right to use the information and ideas submitted by the proposers.

Due to the size, duration, and complexity of the MLWDC project, project management/construction management and project controls/support services consultants were selected to assist the County with managing the project and achieving the desired project budget, schedule, and quality objectives. The consultants will provide specialized staff who will provide the required consultant services under the direction of County staff. Public Works conducted negotiations with Building Mira Loma Joint Venture, which is a joint venture team consisting of: Kitchell CEM, Inc.; APSI Construction Management; and the Casamar Group, a Local Small Business Enterprise, resulting in a recommended not-to-exceed amount of \$4 million, including contingency, for project management/construction management services, and conducted negotiations with Mira Loma Project Controls, LLC, a joint venture team consisting of: Gafcon, Inc.; AIM Consulting Services, a Local Small Business Enterprise; and TEC Management Consultants, LLC, resulting in a recommended not-to-exceed amount of \$2 million, including contingency, for project controls/support services.

Implementation of Strategic Plan Goals

The Countywide Strategic Plan directs the provision of Operational Effectiveness/Fiscal Sustainability (Goal 1) by maximizing the effectiveness of process, structure, and operations to support timely delivery of customer-oriented and efficient public services. It also directs that we ensure Community Support and Responsiveness (Goal 2) by enriching lives of Los Angeles County residents by providing enhanced services, and effectively planning and responding to economic, social and environmental challenges; and Integrated Services Delivery (Goal 3) by maximizing opportunities to measurably improve client and community outcomes and leverages resources through continuous integration of health, community, and public safety services. The Mira Loma Women's Detention Center will support these goals by renovating the facilities to provide enhanced operational efficiency, deliver medical services, and gender responsive programs to the County's female inmate population, and thereby enhancing community and public safety services.

FISCAL IMPACT/FINANCING

The County was awarded \$100 million in AB 900 State grant funding for the proposed project. Approximately \$23.4 million in prior year net County cost is currently appropriated within the MLWDC project, Capital Project No. 69719. Public Works estimates that the current total project cost is approximately \$136.6 million which is inclusive of the \$100 million AB 900 Grant. However, a final project cost will be determined when design build proposals are received at the conclusion of the Part B: Technical and Cost Proposal, component of the solicitation. We will return to the Board with recommendations to award a design-build contract to the selected design-builder and, based on the total contract award, to approve a revised project budget and associated budgetary adjustment to fully fund the proposed project.

The total estimated cost for the project management/construction management and project controls/support services is \$6 million, which includes agreements for Building Mira Loma Joint Venture and Mira Loma Project Controls, LLC. The recommended contract awards will be funded by prior year net County cost currently appropriated in the Fiscal Year 2016-17, Capital Projects/Refurbishments Budget under Capital Project No. 69719.

FACTS AND PROVISIONS/LEGAL REQUIREMENTS

Funding conditions of the AB 900 (Statutes of 2007) guidelines requires the County to execute the identified list of agreements with the State. Public Works, in conjunction with CEO, Sheriff, and County Counsel, will participate in discussions and negotiations with the State to modify the template agreements to reflect the unique conditions of the Mira Loma site and project boundary, including any necessary easement requests by the State to service the project site. Execution of the agreements will enable the County to move forward with releasing Part B: Technical and Price Proposal, portion of the design-build solicitation to select a recommended design-builder for the project for the Board's consideration.

The County has consulted with the City of Lancaster on consistency with the City's General Plan, and the project has been deemed to conform to the City's General Plan pursuant to Government Code Section 65402.

A standard consultant services agreement, in the form previously approved by County Counsel, will be used for the project management/construction management and project controls/support services agreements. These consultant services agreements will contain terms and conditions in compliance with the Chief Executive Office's and the Board's requirements. These agreements will also include a provision requiring the consultant firms to track subcontractor's utilization of Local Small Business Enterprise (LSBE), Disabled Veterans Business Enterprise, and Social Enterprise businesses.

The consultants were selected upon final analysis and consideration without regard to race, creed, gender, or color.

ENVIRONMENTAL DOCUMENTATION

Pursuant to the California Environmental Quality Act (CEQA), the potential environmental effects of the proposed project have been analyzed in a draft EIR and circulated for public review and comment. A final EIR (Enclosure G) has subsequently been prepared that includes the comments received, responses to the comments, and the Mitigation Monitoring and Reporting Program (Enclosure H) for the project. The final EIR is now ready for certification. Environmental findings of fact (Enclosure I) are also provided to the Board.

EIR Process

An Initial Study and Notice of Preparation of an EIR was made available for public review between September 5, 2014, and October 6, 2014. The initial study identified potentially significant effects from the project on the environment in the areas of aesthetics, air quality, biological resources, cultural resources, geology and soils, greenhouse gas emissions, hazards and hazardous materials, hydrology and water quality, land use and planning, noise, population and housing, public services, recreation, transportation and traffic, utilities and service systems, and energy. The County held a scoping meeting for the development of the draft EIR on September 18, 2014, and received comments from agencies as well as individuals.

Public notice of the draft EIR was provided pursuant to CEQA Public Resources Code, Section 21092, and posted pursuant to Section 21092.3. CEQA requires a minimum 45-day public review period; however, the draft EIR was made available for an extended 62-day period from November 9, 2015, to January 12, 2016, to provide additional public comment time during the end of year holiday season. Additionally, a public meeting was conducted on December 8, 2015, at the James C. Gilley Lancaster National Soccer Center Eastside Activity Center, in the City of Lancaster. Comments received during the public review period requested translation of the document in Spanish. Thus, the County provided a Spanish translation of the executive summary, re-noticed the document review in English and Spanish, re-opened the public review period for an additional 30 days from February 1, 2016, to March 2, 2016, and conducted an additional public meeting on February 9, 2016, with available Spanish translation services, at the Lancaster Library.

The draft EIR was made available for review at the Lancaster Library located at 601 Lancaster Boulevard, Lancaster, California 93534; Quartz Hill Library located at 42018 North 50th Street West, Quartz Hill, California 93536; the Public Information Office located at 358 Kenneth Hahn Hall of Administration, 500 West Temple Street, Los Angeles, California 90012 during normal business hours; and was made available online at <ftp://dpwftp.co.la.ca.us/pub/PMD/MiraLomaWomenFacility>. A total of 295 comment letters were received in response to the draft EIR, including 5 letters from public agencies, 7 letters from organizations, and 283 letters from individuals. The most frequently raised concerns in the comments received by the County are: (1) opposition to the expansion of any jail facilities and opposition to incarceration in general; (2) decreased accessibility for some families/visitors due to distance from the urban Los Angeles area; and (3) opposition to placement of inmates at the Lancaster project site based on concerns about potential exposure to Valley Fever (Coccidioidomycosis) due to existing soil conditions in the Antelope Valley. The environmental issues and concerns raised through the CEQA process are addressed in detail in the final EIR. Comments on policy issues and on the merits of the project, which do not address environmental impacts, are also presented to the Board in the final EIR for the Board's consideration.

All comments have been reviewed and found to present no new substantial environmental issues and all issues raised in the comments have been adequately addressed in the draft EIR and/or in the Responses to Comments, Mitigation Monitoring and Reporting Program (MMRP) and Revisions, Clarifications, and Corrections to the draft EIR. All potential impacts associated with the proposed project were found to be less than significant with incorporation of mitigation measures, where applicable. Therefore, the EIR concludes that the proposed project would not result in any significant environmental impacts. An MMRP consistent with the conclusions and recommendations of the final EIR has been prepared and is enclosed and will be incorporated into the construction documents to ensure compliance with mitigation measures.

Responses to public agencies that submitted comment letters, were sent pursuant to Section 21092.5 of the California Public Resources Code.

The location of the documents and other materials constituting the record of the proceedings upon which the Board's decision is based in this matter is the County of Los Angeles, CEO, located at the Kenneth Hahn Hall of Administration, Room 754, 7th Floor, Capital Programs/Property Development and Financing Section.

The proposed project is not exempt from payment of a fee to the California Department of Fish and Wildlife pursuant to Section 711.4 of the Fish and Game Code to defray the costs of fish and wildlife protection and management incurred by the California Department of Fish and Wildlife. Upon the Board's certification of the final EIR and approval of the recommendations, Public Works will file a Notice of Determination in accordance with Section 21152(a) of the California Public Resources Code and pay the required filing and processing fees with the Registrar-Recorder/County Clerk in the amount of \$3,070.

Upon completion of the final project design and prior to project construction, the certified EIR will be reviewed to determine whether further documentation under CEQA is required.

CONTRACTING PROCESS

On October 20, 2015, Public Works issued a Request for Proposals and advertised these contracting opportunities on the County's "Doing Business with Us" website, Public Works Business Opportunities website, and Twitter for project management/construction management and project controls/support services. On November 3, 2015, a mandatory pre-proposal's conference was held to discuss the extent of services and provide small business outreach opportunities, 79 firms attended the conference and of these, 46 were small business firms. Public Works reached out to non-LSBE and/or Small Business Enterprises firms to inform them and their subconsultants of the benefits of being a certified LSBE and to encourage them to become an LSBE, if eligible. Enclosure J reflects the selected joint venture teams' utilization participation. In addition, to encourage equity participation by small business, these solicitations provided incentives for a minimum of 20 percent equity partnership with small businesses.

On December 17, 2015, five joint venture teams submitted proposals for the project management/construction management services, and two joint venture teams submitted proposals for the project controls/support services and on February 9, 2016, Evaluation committees composed of staff from Public Works, Chief Executive Office, Sheriff, Mental Health, and

Public Health evaluated each proposal on the proposed staff qualification and experience, the firm's qualifications and experience, expertise in providing specific services, work plan and understanding of the work requirements in the Request for Proposals. Upon review and evaluations of each firm's proposal, in-person interviews were conducted and evaluated to complete the process. These evaluations were completed without regard to race, creed, color or gender. Based on the review and evaluation of these proposals and interviews, Building Mira Loma Joint Venture was selected as the most-qualified firm to provide the project management/construction management services, and Mira Loma Project Controls, LLC, as the most qualified firm to provide the project controls/support services.

Both Building Mira Loma Joint Venture and Mira Loma Project Controls, LLC, provided 35 percent Small Business Partnership.

The negotiated fees for both consultants have been reviewed by Public Works and were found to be reasonable for the respective scopes of work.

It is recommended that a consultant services agreement for a \$4 million not-to-exceed amount be executed with Building Mira Loma Joint Venture, and a consultant services agreement for a \$2 million not-to-exceed amount be executed with Mira Loma Project Controls, LLC.

The consultant services agreements include a cost-of-living adjustment provision in accordance with the Board Policy No. 5.070.

IMPACT ON CURRENT SERVICES (OR PROJECTS)

There will be no impact on current County services or projects during the performance of the recommended actions.

CONCLUSION

Please return one adopted copy of this letter to the Chief Executive Office, Capital Programs Division and the Department of Public Works, Project Management Division II.

Respectfully submitted,

A handwritten signature in cursive script that reads "Gail Farber".

GAIL FARBER

Director

GF:ME:ecEnclosures

c: Arts Commission
Auditor-Controller
Chief Executive Office (Capital Programs
Division)
County Counsel
Office of Countywide Contract Compliance
Executive Office
Department of Health Services
Internal Services Department
Department of Mental Health
Department of Public Health
Department of Public Social Services (GAIN/
GROW Program)
Sheriff's Department

STATE OF CALIFORNIA

BOARD OF STATE AND COMMUNITY CORRECTIONS

JAIL CONSTRUCTION AGREEMENT

FOR _____

This Board of State and Community Corrections Jail Construction Agreement (“**Agreement**”) is entered into as of _____, 20__ (“**Effective Date**”), by and between the Board of State and Community Corrections (“**BSCC**”), an entity of the state government of the State of California (“**State**”), and _____ (“**Participating County**”), a Political Subdivision of the State. BSCC and Participating County are referred to collectively herein as the “**Parties**,” and individually as a “**Party**.”

RECITALS

WHEREAS, Participating County has proposed to build a jail facility as more particularly described in Exhibit B attached hereto (“**Project**”) located at _____ (“**Site**”) under Chapter 3.12, Part 10b of Division 3 of Title 2 of the California Government Code and the corresponding regulations set forth in Title 15, Division 1, Chapter 1, Subchapter 6 of the California Code of Regulations (collectively, the “**AB 900 Jail Financing Program**”).

WHEREAS, this Agreement is being executed concurrently with the execution of the Project Delivery and Construction Agreement (“**PDCA**”) entered into between the Participating County, BSCC, the State Public Works Board of the State of California (“**Board**”) and the Department of Corrections and Rehabilitation (“**Department**”). The Department, the Board and BSCC are referred to collectively herein as “**Agencies**.”

WHEREAS, the purpose of this Agreement is to set forth the roles, responsibilities and performance expectations of the Parties with respect to the Participating County’s construction of the Project under the authority of the BSCC and the procedures for reimbursement by the State of those Participating County costs eligible for reimbursement as provided for under the AB 900 Jail Financing Program. This Agreement is intended to be read in conjunction with the other agreements necessary for the construction and financing of the Project under the AB 900 Jail Financing Program including, without limitation, the PDCA and the other agreements described in the PDCA recitals. Nothing in this Agreement is intended to amend or modify the rights and obligations of the Parties under those other agreements including, without limitation, the PDCA.

WHEREAS, the Total Project Costs for the Project shall be defined in Article 3, Section 3.1(a) of the PDCA. The State will provide financing (“**State Financing**”) (up to a maximum of _____ dollars (\$_____) (“**Maximum State Financing**”)) and the Participating County will provide the Cash (hard) Match (as defined in Article 6(C) below) and the In-Kind (soft) Match (as defined in Article 6(C) below) (with the Cash (hard) Match and the In-kind (soft) Match collectively referred to as “**Participating County Funding**” and together with the Maximum State Financing, the “**Total Eligible Project Costs**”.) Total Eligible Project Costs shall be used in determining Cash (hard) Match credit and In-kind (soft) Match credit to the Participating Counties as specified in Exhibit A to this Agreement. As stated in Article 1, Section 1.3 of the PDCA, the AB 900 Jail Financing Program is predicated on the Board’s ability

to issue Bonds for the Project.

NOW, THEREFORE, in consideration of the promises and of the mutual agreements, provisions and covenants contained in this Agreement, and for other good and valuable consideration, the receipt and sufficiency of which is hereby acknowledged, the Parties agree as follows:

ARTICLE 1. TERM AND TERMINATION

A. Term. This Agreement shall commence on the Effective Date and shall terminate upon the completion and State acceptance of the Final Audit (as defined below in Article 4(C)) unless terminated earlier as provided in Article 1(C) below.

B. Survival. The provisions of Articles 1(C)(3), 1(C)(4), 3(D), 4(C), 4(D), 6(B)(5), 6(B)(6), 9, 10 and 11, and Articles 3, 4, 5, 6, 7, 8, and 10, 11 of Exhibit A shall survive termination of the Agreement.

C. Termination.

1. BSCC in consultation with the other Agencies may terminate this Agreement in the event any of the following events or conditions occurs:

(a) Participating County's breach of a material term of this Agreement, any Project Document or any Applicable Laws provided Participating County has not cured such breach in all respects within such thirty (30) day period, which cure period may be extended for a reasonable time with the consent of BSCC if the Participating County demonstrates that such additional time is required to cure such breach in a diligent and commercially reasonable manner;

(b) Termination of the PDCA as provided for in Article 2, Section 2.2(a)(i)-(v) and (b) of the PDCA;

(c) Substantive alteration of the scope, cost or schedule of the Project without the prior written approval of BSCC and the Board as required under this Agreement and the PDCA; or

(d) Participating County's refusal or inability to complete the Project in a manner consistent with the Agreement, and the other Project Documents (as defined below in Article 3) including all timelines, plans, and specifications as approved by BSCC, or refusal or inability to comply with any Applicable Law.

2. The Participating County may, prior to the State providing any amount of financing, terminate this Agreement in the event any of the following occurs:

(a) The State's breach of a material term of this Agreement, any Project Document or any Applicable Laws provided the State has not cured such breach in all respects within thirty (30) days from notice of said breach, which cure period may be extended for a reasonable time with the consent of the Participating County if the State demonstrates that

such additional time is required to cure such breach in a diligent and commercially reasonable manner;

(b) Termination of the PDCA as provided for in Article 2, Section 2.2(a)(i)–(v) and (b) of the PDCA;

(c) Failure of the State to execute the Ground Lease or the Right of Entry for Construction and Operation; or

(d) In the event the Board determines the Participating County is no longer eligible for Project financing under the AB 900 Jail Financing Program as set forth in Article 1, Section 1.2 of the PDCA.

3. In the event of termination as provided in Article 1(C)(1), and unless the Parties agree in writing otherwise, Participating County shall, upon notification, refund to the Agencies an amount equal to all State Financing previously disbursed to the Participating County. Any State Financing so remitted to the Agencies may be subject to interest equal to the rate earned by the State Pooled Money Investment Account. Participating County shall not be required to refund any State Financing in the event of termination solely because, through no fault of Participating County, the Board determines it is not feasible or appropriate to issue bonds or is unable to issue bonds to finance the Participating County's Project.

4. Nothing in this Article 1 in any way alters or limits the authority of BSCC or the Agencies to withhold State Financing in accordance with Applicable Laws (as defined below) or any other right or remedy available to the State at law or in equity for breach of the Agreement.

ARTICLE 2. PROJECT OFFICIALS

A. BSCC Representative. The BSCC Executive Director or his or her designee shall be the State's representative ("**Agency Representative**") for administration of this Agreement. Any amendment to this Agreement, including any exhibit, schedule or attachment hereto, shall be binding on the State only if signed by the Agency Representative. This Article 2(A) shall not limit any requirements for amendment of any other agreement that is a Project Document.

B. Participating County Construction Administrator. The Participating County has appointed a County Construction Administrator as identified below. Participating County agrees that its County Construction Administrator shall be its representative for the administration of the Agreement and shall have full authority to act on behalf of the Participating County. Participating County agrees that all communications given to its County Construction Administrator shall be binding as if given to the Participating County. Participating County agrees that any documents required to be submitted to the Agencies, including but not limited to, quarterly progress reports and final project summary reports, shall be certified for accuracy by its County Construction Administrator in form reasonably acceptable to BSCC. Any Amendment to this Agreement and any other Project Document shall be binding on the Participating County only if signed or certified in form reasonably acceptable to BSCC by the County Construction Administrator.

County Construction Administrator: _____
Title: _____
Address: _____
City, State, Zip: _____
Telephone: _____
Facsimile: _____
Email: _____

C. Participating County Project Financial Officer. The Participating County has appointed a Project Financial Officer as identified below. Participating County agrees that its Project Financial Officer shall be responsible for establishing an official project file and a separate account for depositing of funds paid under this Agreement, and ensuring that project accounting procedures and practices are in accordance with generally accepted government accounting principles and practices (see Accounting Standards and Procedures for Counties, California State Controller, Division of Local Government Fiscal Affairs) with adequate supporting documentation maintained in such detail so as to provide an audit trail which will permit tracing transactions from support documentation, to the accounting records, to the financial reports and billings. Participating County agrees that all fiscal documents, including all invoices and expenditure statements, required to be submitted to BSCC shall be certified for accuracy by its Project Financial Officer.

Project Financial Officer: _____
Title: _____
Address: _____
City, State, Zip: _____
Telephone: _____
Facsimile: _____
Email: _____

D. Participating County Project Contact Person. The Participating County has appointed a County Project Contact Person as identified below. Participating County agrees that its County Project Contact Person shall be responsible for coordinating and transmitting information to BSCC and receiving and disseminating information from BSCC. Participating County agrees that all communications given to its County Project Contact Person shall be binding as if given to the Participating County.

County Project Contact Person: _____
Title: _____
Address: _____
City, State, Zip: _____
Telephone: _____
Facsimile: _____
Email: _____

Either Party may change its Project representatives upon written notice to the other Party.

ARTICLE 3. PROJECT DOCUMENTS AND APPLICABLE LAWS.

A. Project Documents. The Participating County agrees to construct the Project in accordance with the following agreements and documents each as may be amended in accordance with its terms and which, together with the Agreement, shall be referred to herein as the “**Project Documents**”: (1) BSCC Jail Construction Agreement Standard Conditions attached hereto as Exhibit A; (2) Participating County’s Project Proposal [Insert Name and Date of Participating County’s Bid Proposal] (“**County Project Proposal**”); (3) County Project Description Detail and Budget (“**Project Description**”) in the form attached hereto as Exhibit B; (4) Ground Lease, Right of Entry for Construction and Operation, Facility Lease and the Facility Sublease as those terms are defined in the PDCA; and (5) the PDCA .

B. Applicable Laws. The Participating County agrees to comply with all federal, state or local laws, regulations, rules, ordinances and guidelines applicable to the construction of the Project including, without limitation the following (collectively “**Applicable Laws**”):

1. The Minimum Standards for Local Detention Facilities and Local Jail Construction Financing Program regulations contained in Title 15, Division 1, Chapter 1, Subchapters 4 and 6 of the California Code of Regulations (“**CCR**”).
2. The Minimum Standards for Local Detention Facilities and the fire and life safety regulations contained in Title 24 of the CCR.
3. California Public Contract Code.
4. California Environmental Quality Act (CEQA) contained in Section 21000 *et seq.* of the California Public Resources Code and Title 14, Division 6, Chapter 3, Sections 15000 *et seq.* of the CCR.
5. Accounting Standards and Procedures for Counties, California State Controller, Division of Local Fiscal Affairs.
6. Construction Financing Agreement Administration and Audit Guide.

C. Incorporation of Approved Changes. Upon their completion, all Participating County assurances and submittals, submitted to and approved in writing by BSCC are incorporated herein by reference and made a part of this Agreement.

D. Precedence. In the event of any inconsistency in the Project Documents, except as otherwise provided herein, the inconsistency shall be resolved by giving precedence in the following order: 1) PDCA; 2) the Ground Lease (as defined in the PDCA); 3) this Agreement including the BSCC Jail Construction Agreement Standard Conditions attached hereto as Exhibit A; 4) the Right of Entry for Construction and Operation (as defined in the PDCA); 5) Participating County’s Project Proposal; 6) Participating County Project Description Detail and Budget; and 7) the Participating County’s proposal(s), modification(s), and submittals. In the event the Bonds are issued, any inconsistency between the Project Documents and the Bond Documents shall be resolved by giving precedence to the Bond Documents. To the extent the Parties mutually agree that a provision of a particular document should control with respect to an

inconsistency between that document and another document or documents, notwithstanding the other provisions of this Section, such provision shall control.

ARTICLE 4. PARTICIPATING COUNTY OBLIGATIONS

Participating County agrees to the following covenants, assurances and submittals:

A. Participating County's Construction of Jail. The Participating County shall construct the Project to ensure and enable compliance with all Applicable Laws, and Participating County agrees that State Financing and Cash (hard) Match funds shall not supplant funds otherwise dedicated or appropriated for construction activities. No review or approval provided by the State, the Agencies or the State Fire Marshal of documents or submittals shall relieve Participating County of its obligation to design and construct the Project in accordance with this Agreement and all Applicable Laws including, without limitation environmental, procurement, safety and health, the AB 900 Jail Financing Program, and Titles 15 and 24 of the CCR. The Agencies' review and approval of any Project Document is for the Agencies' purposes only. No alleged failure or oversight related to the Agencies' review of the Project or the Project Documents shall be construed as a waiver of any rights of the Agencies or the State of California, or construed as an excuse to performance by Participating County under this Agreement or any other agreement. All Plans (as defined below) prepared by the Participating County shall be consistent with the Participating County Project Proposal.

B. Valley Fever. California is one of several states in the country with soils that may contain spores known to cause the disease *Coccidioidomycosis* (sometimes called "Valley Fever"), which spores may be transmitted through contact with dirt and fugitive dust associated with construction activities. The Participating County shall disclose this information to contractor in or prior to execution of a Construction Agreement. The Participating County, its contractor and any lower-tier subcontractors shall take appropriate precautionary measures designed to minimize the exposure of their respective employees and other workers, Agencies' employees, and other individuals or personnel who may be present during construction activities.

C. Record Keeping and Audit Requirements. Participating County shall keep such full and detailed account records as are necessary for proper financial management of the Project. Participating County shall maintain a complete and current set of all books and records relating to the design and construction of the Project. Agencies shall be entitled, upon forty-eight (48) hour written notice, to inspect all books, records, and accounts kept by Participating County relating to the work contemplated by this Agreement. Within ninety (90) calendar days after Final Completion (as defined below), Participating County shall deliver to Agencies a financial audit of the Project ("**Final Audit**"). The Final Audit shall be performed by a Certified Public Accountant or a Participating County auditor that is organizationally independent from the Participating County's project financial management functions. Nothing in this Article 4(C) shall limit the Participating County's record retention obligations as set forth in Article 7 of the PDCA. For purposes of this Agreement, "**Final Completion**" shall mean completion of the Project.

D. Compliance with Project Documents and Applicable Laws. Participating County agrees to comply with all terms and conditions of this Agreement, the other Project Documents

and all exhibits and schedules attached hereto or thereto and all Applicable Laws.

E. Project Plans. In addition to all submission requirements under the PDCA, the Participating County shall submit to BSCC the architectural and design documents, drawings, specifications, calculations, general and special conditions, submittals, Project budgets, schedules and contracts (collectively, “Plans”) within the time frames as specifically set forth in Exhibit B and as otherwise may be required by the Project Documents and Applicable Laws. As a condition to the financing to be provided by the State through interim financing or the sale of bonds, Participating County shall cause to be prepared all required Plans and documents necessary to solicit design-build bids or proposals, and complete the Project on time and within budget. Participating County is solely responsible for preparing all Plans and other documents for the design-build solicitation process, as provided by Applicable Law. In addition, Participating County is solely responsible for ensuring the final construction documents and specifications are approved by both the BSCC and the State Fire Marshal before issuance and sale of State lease revenue bonds for the Project as set forth in Article 1, Section 1.2 of the PDCA.

F. Construction. Participating County shall be responsible to contract for all design and construction services, and shall manage the day-to-day design and construction of the Project. Participating County shall cause the design and construction of the Project to be consistent with the requirements, limitations, and other terms of this Agreement, the Project Documents, all Applicable Laws, as well as all other agreements between the Agencies and Participating County.

G. Operation of Jail. Participating County shall be responsible to maintain the jail upon Final Completion and staff and operate the jail no later than ninety (90) days after Final Completion.

H. Professional Services. Participating County shall be responsible for providing all necessary professional services in order to carry out the design and construction of the Project. Participating County shall obtain all professional services from properly licensed design professionals. All Plans prepared by such design professionals shall bear the signature and seal of the design professional. All construction work on the Project shall be performed by properly licensed contractors and subcontractors. Participating County is encouraged to utilize a qualified construction manager and claims avoidance experts to facilitate timely and efficient construction of the Project.

I. Completion of Project. Participating County agrees to proceed expeditiously with, and complete, the Project in accordance with the Project Documents and Plans as approved by the BSCC and the Agencies and/or as incorporated in all provisions of this Agreement. Participating County acknowledges and understands that failure to meet application assurances, construction timelines and any other milestones or timelines as set forth in the Project Documents or Plans as approved by the Agencies and/or as incorporated in all provisions of this Agreement, may result at any time in award adjustments or Agreement termination by the BSCC.

ARTICLE 5. SUBSTANTIAL CHANGES.

In addition to the modification requirements set forth in Article 4, Section 4.2 of the PDCA, no substantial change to the Project Documents or other substantial modification to the Project may be made by Participating County without the prior written permission of the BSCC. Minor modifications to the Project do not require BSCC approval, but must be documented and reported on routine progress reports to the BSCC. Without limiting the foregoing, BSCC approval shall be required upon any of the following events or circumstances:

1. more than minor changes which affect the design or scope of the Project;
2. a delay or change in the date of substantial completion or Final Completion;
3. a more than minor change to the design, location, size, capacity or quality of major items of equipment. As used herein "substantial" is as defined in the State Administrative Manual, Section 6863. As used herein a minor change is any change which does not rise to the level of a substantial change under the State Administrative Manual, Section 6863;
4. a change in approved budget categories, or movement of dollars between budget categories as indicated in Exhibit B; or
5. any change that would impact BSCC or State Fire Marshal construction or operational regulations including, without limitation, Titles 15 and 24 of the CCR , or which affects the security or fire and life safety of the facility.

Participating County agrees that its County Construction Administrator will give prompt notification in writing to the BSCC of the occurrence of any of the above events and report any substantial modifications to the Agreement for Construction with its contractor. BSCC shall notify the Department consistent with Article 4 of the PDCA, and the Department shall make a Scope Change Request to the Board. Approval of this Scope Change Request by the Board shall be required before material change to the Project Documents or other substantial modification to the Project may be made by the Participating County.

In no event shall any budget changes be authorized which would cause the amount of Total Project Costs to be exceeded unless the Participating County covenants to fund such excess with lawfully available funds and with the consent of the Agencies and so appropriates such funding.

ARTICLE 6. PROJECT FUNDING

A. Invoices. Invoice and progress/final reports and all required audit reports shall be submitted to the BSCC in a timely manner as specified in this Agreement and Exhibit A.

B. State Financing Obligations.

1. In no event or circumstance shall the State or Agencies be obligated to pay the Participating County under this Agreement or any other Project Document any amount in excess of the Maximum State Financing. Participating County waives any and all claims against the Agencies or the State of California for any costs which exceed the Maximum State

Financing. The Participating County is solely responsible for any and all cost, expenses or fees of the Project which exceed the Maximum State Financing. Reimbursement of county costs from State Financing shall be limited to those costs permitted under Article 1(A) of Exhibit A and/or specifically identified in Exhibit B as “**Eligible State Costs**” provided, however, the State’s obligations to reimburse Participating County for any State Financing is contingent on (1) the availability of Interim Financing and (2) even if Interim Financing is provided, the successful sale of bonds sufficient to cover all remaining Eligible State Costs. State Financing shall be subject to the terms and conditions set forth in the PDCA.

2. Eligible State Costs subject to reimbursement shall in no event or circumstance exceed Maximum State Financing. Because the funds to be paid are limited, Participating County shall be obligated to complete the Project without additional State Financing. No additional State Financing will be available, and Participating County should take all necessary precautions to ensure that the Project is designed and constructed within the Project budget. The Participating County shall be responsible for any costs exceeding the Total Eligible Project Costs.

3. State shall reimburse the Participating County for Eligible State Costs provided Participating County’s performance of the Project is consistent with the Project Documents, including the Construction Schedule, and Participating County is not in breach of any term or condition of this Agreement, any Project Document, or any Applicable Law. At mutually agreed upon intervals as set forth in Exhibit A, Article 7, Participating County shall submit to BSCC a reimbursement request for payments of Eligible State Costs for which Participating County has already paid.

4. BSCC may reject any invoice or item on an invoice should it be determined that such invoice or item is ineligible for reimbursement under the terms of this Agreement, the Project Documents or any Applicable Laws (“**Improper Expenditure**”). Should it later be determined Participating County has been reimbursed for an Improper Expenditure or the State has made a payment to Participating County in excess of the amount for which the State is obligated (“**Excess Payment**”), BSCC may withhold future payments or repayments in amounts equal to the Improper Expenditure or the Excess Payment. In the event the amount of an Improper Expenditure exceeds the total reimbursement amount due Participating County, or should the discovery of the Improper Expenditure or Excess Payment occur after payment of the Withhold Amount (as defined below), Participating County shall immediately pay to BSCC the amount of the Improper Expenditure or Excess Payment.

5. At such time as the unreimbursed balance of the Eligible State Costs equals Five percent (5%) of the total Eligible State Costs (“**Withhold Amount**”), BSCC shall withhold that amount as security for Participating County’s performance of all its obligations under this Agreement. The Withhold Amount shall be released upon satisfaction of all of the following conditions: (a) there has been Final Completion of the Project, (b) delivery by Participating County and acceptance by Agencies of the Final Audit and the Final Project Summary Report, (c) Participating County has staffed and operated the jail as required under Article 4(G) above, and (d) Participating County is not in breach of any provisions of this Agreement, the other Project Documents and Applicable Laws.

6. All agreements with the contractor and any other contractor or subcontractor of Participating County or the contractor providing services or goods on the Project and for which reimbursement with State Financing for all or any portion of the payment for such services or goods is sought, shall require the contractor or subcontractor to list construction costs according to the CSI Divisions for the approved Schedule of Values.

C. Participating County Funding. Subject to all terms and provisions of this Agreement, the Participating County agrees to appropriate and spend cash (hard) matching funds as provided in Exhibits A and B (“**Cash (hard) Match**”). Subject to all terms and provisions of this Agreement, the Participating County agrees to provide in-kind (soft) match in accordance with Exhibits A and B (“**In-kind (soft) Match**”). Participating County agrees to expend Cash (hard) Match funds on a schedule that is at least pro-rata with the percentage expenditure of Eligible State Costs.

ARTICLE 7. ADMINISTRATIVE OVERSIGHT BY BOARD

Notwithstanding any other term or condition of this Agreement or any other Project Document, the scope and cost of the Project shall be subject to approval and administrative oversight by the Board, as required by California Government Code Section 15820.911.

ARTICLE 8. PERFORMANCE AND PAYMENT BONDS

Participating County shall require the contractor to procure and maintain a payment bond and a performance bond each of which shall be in an amount not less than one hundred percent (100%) of the contractor’s total contract price as set forth in the agreement between Participating County and contractor. The bonds shall be issued by one or more surety companies acceptable to the Agencies. The performance bond required by this Article 8 shall name the State as an additional beneficiary under the bonds.

ARTICLE 9. INDEMNITY

As required by California Government Code Section 15820.915, the Participating County hereby agrees to indemnify, defend and save harmless the State, including but not limited to the Board, the Department and the BSCC, and each of their respective officers, governing members, directors, officials, employees, subcontractors, consultants, and agents (collectively, “Indemnitees”) for any and all claims and losses arising out of the acquisition, design, construction, operation, maintenance, use and occupancy of the Project. The Participating County shall not be obligated to provide indemnity or defense where the claim arises out of the active negligence or willful misconduct of the Indemnitees. These obligations shall survive any termination of this Agreement.

ARTICLE 10. DISPUTES

Disputes arising under or relating to this Agreement shall be resolved in accordance with the provisions of Article 10 of Exhibit A.

ARTICLE 11. GENERAL TERMS AND CONDITIONS

The general terms and conditions published by the Department of General Services at <http://www.documents.dgs.ca.gov/ols/GTC-610.doc> and applicable to all State of California contracts are hereby incorporated by reference into this Agreement. In the event of a conflict between GTC-610 and any sections herein, the sections herein take precedence. In signing below, the Participating County's authorized representative represents and warrants that the Participating County has read and understands these general terms and conditions.

ARTICLE 12. COUNTERPARTS

This Agreement may be executed in one or more counterparts, any one of which need not contain the signatures of more than one Party, but all of which when taken together shall constitute one and the same instrument, notwithstanding that all Parties have not signed the same counterpart hereof.

[SIGNATURE PAGE TO IMMEDIATELY FOLLOW]

FORM OF DOCUMENT

IN WITNESS THEREOF, the Parties have executed this Agreement, as of the Effective Date.

BOARD OF STATE AND COMMUNITY CORRECTIONS

By: _____
Signature of Executive Director or Designee

Name and Title: _____
Date: _____

“PARTICIPATING COUNTY”

County of:

By: _____
Signature

Name and Title: _____
Date: _____

FORM OF DOCUMENT

EXHIBIT A

CONSTRUCTION AGREEMENT STANDARD CONDITIONS

ARTICLE 1. TOTAL ELIGIBLE PROJECT COSTS

A. Participating County shall only be reimbursed by the State from State Financing for Eligible State Costs. “**Eligible State Costs**” means reasonable and necessary Project costs actually incurred in construction of the Project and as specified in Exhibits A and B attached to the Agreement. Eligible State Costs also must be eligible for lease-revenue bond financing pursuant to this Agreement (including all Exhibits referenced therein) and all California state laws, rules, regulations, guidelines, and policies including, without limitation, Title 15, Local Jail Construction Financing Program regulations and any other Applicable Laws. Such Eligible State Costs shall include, but are not limited to, the items set forth in subsection (1) through (8) below. Participating County shall receive BSCC’s written consent prior to Participating County’s incurring the expense for any Project costs not listed below and for which Participating County wants State reimbursement provided such expenses do not fall within Participating County Costs as defined below in subsection (B).

1. On-site costs of facility construction of the BSCC-approved local jail facility project, including site preparation (eligible for State Financing or Cash (hard) Match).
2. Architectural programming and design (for activities by consultants and contractors; eligible for State Financing or Cash (hard) Match).
3. Construction management (for activities by consultants and contractors; eligible for State Financing or Cash (hard) Match).
4. Building permit fees, sewer/utility use or unit fees, and building inspection fees (eligible for State Financing or Cash (hard) Match).
5. Fixed equipment items (e.g., heating, ventilation, air conditioning, plumbing, lighting, communications, surveillance, security and life/safety equipment, etc.) as necessary for the operation of the BSCC-approved local jail facility (eligible for State Financing or Cash (hard) Match).
6. Fixed furnishings items (e.g., built-in and/or permanently affixed counters, tables, cabinets, seats, etc.) as necessary for the operation of the BSCC-approved local jail facility (eligible for State Financing or Cash (hard) Match).
7. Installation of existing fixed equipment and furnishings as necessary for the operation of the BSCC-approved local jail facility (eligible for State Financing or Cash (hard) Match).
8. Moveable equipment and moveable furnishings (subject to State review and approval; eligible for State Financing or Cash (hard) Match).

B. Participating County must provide a minimum of at least _____ percent (___%) of the Total Eligible Project Costs as any combination of Cash (hard) Match and In-kind (soft) Match funds. **(Note to drafter: Large and Medium counties must provide a minimum of 10%).** Cash (hard) Match funds cannot be used to supplant or replace funds otherwise dedicated or appropriated by the Participating County for construction activities. Cash (hard) Match funds cannot be claimed for salaries/benefits of regular employees of the Participating County Workforce but may be claimed for the services of consultants or contractors engaged to perform Project related services as described below. Cash (hard) Match funds only include costs of:

1. Items eligible for Eligible State Costs as described above;
2. Preparation costs for full or focused environmental reports (for activities by consultants and contractors);
3. Off-site costs, including access roads and utilities development, outside of a reasonable buffer zone surrounding the perimeter of the security fence, detention facility building and parking lot; and
4. Public art.

C. In-kind (soft) Match funds may be claimed for Project related costs for activities performed by Participating County staff or consultants. Eligible In-kind (soft) Match funds only includes:

1. Audit of Total Eligible Project Costs at the conclusion of the Project (staff salary/benefits of independent Participating County auditor or services of contracted auditor);
2. Needs assessments (staff salary/benefits and/or consultant costs directly related to the Project);
3. Site acquisition cost or current fair market land value supported by independent appraisal (on-site land only regardless of acquisition date) and as approved by the Department of General Services. This can be claimed for on-site land cost/value for new facility construction, on-site land cost/value of a closed facility that will be renovated and reopened, or on-site land cost/value used for expansion of an existing facility. It cannot be claimed for land cost/value under an existing operational local jail facility;
4. Participating County administration (staff salary/benefits directly related to the Project for activities after October 1, 2011);
5. Transition planning (staff salary/benefits and consultant activities directly related to the Project for activities after October 1, 2011); and
6. Real estate due diligence costs as billed to the Participating County by the State.

D. Participating County shall not under any circumstance be reimbursed by the State from Board interim financing sources, lease-revenue bond funds or from any other financing

source for Ineligible Project Costs. “**Ineligible Project Costs**” means all costs which are not eligible for lease-revenue bond financing or Participating County matching funds pursuant to the PDCA (including all Exhibits attached thereto) or pursuant to any California state law, rule, regulation, guideline, or policy including, without limitation, the AB 900 Jail Financing Program or any other Applicable Law. Participating County shall be responsible for all Ineligible Project Costs (“**Participating County Costs**”). Ineligible Project Costs also shall include but are not limited to the following:

1. Those Project Costs that are determined by the BSCC to be unreasonable or unnecessary costs.
2. Detention facility personnel and operational costs and related costs of supplies.
3. Soil and water contamination assessment/mitigation.
4. Excavation of burial sites.
5. Preparation of Environmental Impact Reports (ineligible for State Financing; eligible for Cash (hard) Match only if performed by consultants or contractors outside the regular county work force, eligible for In-kind (soft) Match if performed by county-paid employees).
6. Bonus payments for early completion of work.
7. Interest charges for late payments.
8. Interest on bonds or any other form of indebtedness required to finance Project costs.
9. Costs outside the scope of the BSCC-approved Project.
10. Fines and penalties due to violation of or failure to comply with federal, state or local laws, ordinances, or regulations.
11. Personal injury compensation or damages arising out of or connected with the Project, whether determined by adjudication, arbitration, negotiation, or otherwise.
12. All costs incurred in violation of the terms, provisions, conditions, or commitments of this Agreement.
13. Travel and per diem costs.
14. All costs arising out of or connected with contractor claims against the Participating County, or those persons for whom the Participating County may be vicariously liable, including, but not limited to, any and all costs related to defense or settlement of such claims.

15. Maintenance costs.
16. Supplanting of existing construction, programs, projects, or personnel.
17. All costs arising out of or attributable to Participating County's malfeasance, misfeasance, mismanagement, or negligence.
18. Temporary holding or court holding facilities.
19. Local Jail facilities or portions thereof operated by jurisdictions other than Participating County.

ARTICLE 2. PARTICIPATING COUNTY'S GENERAL RESPONSIBILITY

Participating County is solely responsible for design, construction, operation, and maintenance of the Project as identified in Exhibit B of this Agreement. Review and approval of plans, specifications, or other documents by BSCC, the Agencies and the State Fire Marshal, is solely for the purpose of proper administration of State Financing by the BSCC and the Agencies and shall not be deemed to relieve or restrict the Participating County's responsibility.

ARTICLE 3. PARTICIPATING COUNTY ASSURANCES AND COMMITMENTS

A. Compliance with Laws and Regulations. This Agreement is governed by and shall be interpreted in accordance with the laws of the State of California. Participating County shall at all times comply with all Applicable Laws (as defined in the Agreement).

B. Fulfillment of Assurances and Declarations. Participating County shall fulfill all assurances, declarations, representations, and statements made by the Participating County in the County Project Proposal, documents, amendments, and communications filed in support of its request for lease-revenue bond funds including adoption of a BSCC approved staffing plan for staffing and operating the facility in accordance with state standards within ninety (90) calendar days of construction completion.

C. Use of State Financing. Participating County shall expend all State Funds and identified matching funds solely for Eligible Project Costs. Participating County shall, upon demand, remit to the BSCC any State Financing not expended for Eligible Project Costs or an amount equal to any State Financing expended by the Participating County in violation of the terms, provisions, conditions, or commitments of this Agreement. Any State Financing so remitted to the BSCC shall include interest equal to the rate earned by the State Pooled Money Investment Account.

D. Permits and Licenses. Participating County agrees to procure all permits and licenses necessary to complete the Project, pay all charges and fees, and give all notices necessary or incidental to the due and lawful proceeding of the Project work.

E. Compliance with Deliverables, Drawings, and Specifications. Participating County agrees that deliverables, drawings, and specifications, upon which prime and subcontracts are awarded, shall be the same as those submitted to and approved by the BSCC.

F. Prime and Subcontracting Requirements. In accordance with the provisions of this Agreement, the Participating County may contract with public or private contractors of services for activities necessary for the completion of the Project. Participating County agrees that in the event of an inconsistency between the Agreement and any other Project Document and Participating County's Construction Agreement with a contractor, the Project Documents will prevail. Participating County shall ensure that the contractor complies with all requirements of the Project Documents and all instructions of the County Construction Administrator regarding compliance with the Project Documents.

Participating County assures that for any contract awarded by the Participating County, such insurance (e.g., fire and extended coverage, workers' compensation, public liability and property damage, and "all-risk" coverage) as is customary and appropriate will be obtained.

Participating County agrees that its contractor will list construction costs according to the CSI Divisions for the approved Schedule of Values. Since certain portions of the Project may not be eligible for State Financing in all requests for reimbursement, the Participating County's contractor shall separately list work not eligible for State Financing, and the County Construction Administrator shall identify such work for the contractor.

Participating County agrees that it is the County Construction Administrator's responsibility to provide a liaison between the Participating County, the BSCC, and its contractor. Participating County agrees that its contractor is not responsible nor required to engage in direct discussion with the BSCC or any representative thereof, except that the contractor shall in good faith exert its best effort to assist the Participating County in fully complying with all requirements of the contract.

Participating County agrees to place appropriate language in all contracts for work on the Project requiring the Participating County's contractor(s) to:

1. Books and Records. Maintain adequate fiscal and Project books, records, documents, and other evidence pertinent to the contractor's work on the Project in accordance with generally accepted accounting principles. Adequate supporting documentation shall be maintained in such detail so as to permit tracing transactions from the invoices, to the financial statement, to the accounting records, and to the supporting documentation. These records shall be maintained for the period set forth in Article 5 below, and shall be subject to examination and/or audit by the BSCC or designees, state government auditors or designees.

2. Access to Books and Records. Make such books, records, supporting documentations, and other evidence available to the BSCC or designees, the Department, the Board, the Department of General Services, the Department of Finance, the Bureau of State Audits, their designated representatives, during the course of the Project and for the period set forth in Article 5 below, and provide suitable facilities for access, monitoring, inspection, and copying thereof. Further, the Participating County agrees to include a similar right of the state to audit records and interview staff in any subcontract related to the performance of this Agreement.

3. Contractor Advisement. Be advised that a partial source of financing for the agreement between the Participating County and contractor for construction of the Project is the State Financing, and that the Participating County may not have funds to finance the Construction Agreement independently of the State Financing. The contractor shall in all ways cooperate with the Participating County and the BSCC in maintaining a good working relationship. The contractor shall cooperate as instructed by the County Construction Administrator in resolving any disputes arising under the Agreement.

ARTICLE 4. PROJECT ACCESS

To the extent not inconsistent with the Bond Documents, as that term is defined in Article 1 Section 1.1(a) of the PDCA, at all times during construction of the Project and after final completion, the Participating County shall provide to employees, subcontractors, and consultants of the Agencies reasonable unrestricted access to observe, monitor and inspect the Project. The Agencies' access to observe, monitor and inspect shall include the right to review all documents and files relating to the Project, as well as construction on the Site, including all tests and inspections relating to design or construction of the Project.

ARTICLE 5. RECORDS

Participating County shall establish an Official Project File, as defined in Article 7, Section 7.1 of the PDCA.

Participating County shall establish separate accounting records for receipt, deposit, and disbursement of all Project funds as specified in Exhibit A Article 9.

Participating County shall maintain books, records, documents, and other evidence sufficient to reflect properly the amount, receipt, and disposition of all Project funds, including State Financing, any matching funds provided by the Participating County and the total cost of the Project. The maintenance requirements extend to books of original entry, source documents supporting accounting transactions, the general ledger, subsidiary ledgers, personnel and payroll records, canceled checks, and related documents and records. Source documents include copies of all awards, applications, and required financial and narrative reports. Personnel and payroll records shall include the time and attendance reports for all individuals reimbursed under the award, whether they are employed full-time or part-time. Time and effort reports are also required for consultants and contractors. Supporting documentation for matching funds, goods or services shall, at a minimum, include the source of the match, the basis upon which the value of the match was calculated, and when the matching funds, goods, or services were provided. Receipts, signed by the recipient of donated goods and/or services should be issued and a copy retained. Generally accepted government accounting principles and adequate supporting documentation shall be maintained in such detail so as to provide an audit trail which will permit tracing transactions from the invoices to the financial statement, to the accounting records, and to the supporting documentation for the purpose of determining compliance with Section 10115 *et seq.* of the California Public Contract Code, Section 8546.7 of the California Government Code, and Title 2, Division 2, Chapter 3, Subchapter 10.5 Section 1896.60 *et seq.* of the CCR (as applicable).

Participating County shall maintain all records for the period set forth in the PDCA (“**Record Maintenance Period**”). Participating County agrees to protect records adequately from fire or other damage. When records are stored away from the Participating County’s principal office, a written index of the location of records stored must be on hand and ready access must be assured. All Participating County records shall be subject at all reasonable times to inspection, examination, monitoring, copying, excerpting, transcribing, and audit by the BSCC or designees, the Agencies, and by state government auditors or designees. If any litigation, claim, negotiation, audit, or other action involving the records has been started before the expiration of the Record Maintenance Period, the records must be retained until the completion of the action and resolution of all issues which arise from it or until the end of the Record Maintenance Period, whichever is later.

ARTICLE 6. ACCOUNTING AND AUDIT REQUIREMENTS

All funds received by the Participating County shall be deposited into separate fund accounts which identify the funds and clearly show the manner of their disposition. Participating County agrees that the audit and accounting procedures shall be in accordance with generally accepted government accounting principles and practices (see Accounting Standards and Procedures for Counties, California State Controller, Division of Local Government Fiscal Affairs) and adequate supporting documentation shall be maintained in such detail so as to provide an audit trail which will permit tracing transactions from support documentation to the accounting records to the financial reports and billings. Participating County further agrees to the following audit requirements:

A. Pre-payment Audit. Prior to the deposit of State Financing into the separate account, the BSCC may require the Participating County to have a system audit performed by an auditor satisfactory to the BSCC to insure that the Participating County’s accounting system meets generally accepted government accounting principles;

B. Interim Audit. The BSCC reserves the right to call for a program audit or a system audit at any time between the execution of this Agreement and the completion or termination of the Project. At any time, the BSCC may disallow (that is, deny both use of funds and any applicable matching credit for) all or part of the cost of the activity or action determined to be not in compliance with the terms and conditions of this Agreement, or take other remedies legally available; and,

C. Final Audit. Within ninety (90) calendar days of Final Completion, the Participating County must obtain and submit a final program audit to the BSCC (see Construction Financing Program Agreement Administration and Audit Guide). The audit shall be prepared in accordance with generally accepted auditing standards and government auditing standards for financial and compliance audits. The audit may be performed by the Participating County subject to the terms hereinafter described, or the Participating County may hire, at Participating County cost, an independent auditor to complete the final audit. Participating County should obtain assurances that the personnel selected to perform the audit collectively have the necessary skills. It is important that a sound procurement practice be followed when contracting for audit services. Sound contract and approval procedures, including the monitoring of contract performance, should be in place. The objectives and scope of the audit should be

made clear. In addition to price, other factors to be considered include: the responsiveness of the bidder to the request for proposal; the past experience of the bidder; availability of bidder staff with professional qualifications and technical abilities; and whether the bidder organization participates in an external quality control review program. It should be noted that these steps are important whether the Participating County is hiring auditors from an outside CPA firm or within its own internal auditing unit.

Since the audit function must maintain organizational independence, the County Financial Officer for this Project shall not perform audits of the contract-related activities. If the Participating County internal auditor performs the audit, the auditor must be organizationally independent from the Participating County's accounting and project management functions. Additionally, Participating County internal auditors who report to the Project Financial Officer, or to whom the Project Financial Officer reports, shall not perform the audit. The person conducting the audit shall be a certified public accountant, unless a Participating County auditor completes the audit. Failure to comply with these qualifications standards could result in the rejection of the audit report.

At any time, the BSCC may disallow (that is, deny both use of funds and any applicable matching credit for) all or part of the cost of the activity or action determined to be not in compliance with the terms and conditions of this Agreement, or take other remedies legally available.

The BSCC reserves the right to have an audit conducted (at the BSCC's expense) at any time between execution of the Agreement up to and including the final audit of the Project.

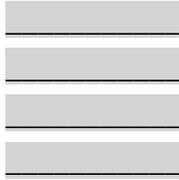
ARTICLE 7. REPORTS

Participating County agrees to submit fiscal invoices and progress/final reports in a format specified by the BSCC, and at mutually agreed upon intervals as defined below, during the period of the Agreement. Reports are due to the BSCC even if State Financing is not expended or requested in the reporting period. Not submitting invoices and progress/final reports in a timely manner may result in disbursements being withheld. In addition, Participating County shall immediately advise the BSCC of any significant problems or changes arising during the course of the Project.

Without limitation of the foregoing, the following reports are required:

A. Fiscal Invoice and Progress/Final Report. Participating County agrees to submit fiscal invoices and progress/final reports to the BSCC on the appropriate form provided to the Participating County during the term of this Agreement and shall do so on a regular schedule of either monthly, bi-monthly or quarterly. The reports shall include, but not be limited to, Project construction activities, change orders issued, problems identified, assistance needed, state funds and match expenditures made, State Financing received, and State Financing requested.

Invoicing/progress reporting interval: The indicate interval fiscal and progress/final report must be submitted within forty-five (45) calendar days after the end of indicate interval. The due dates for the invoices and progress reports are no later than:



B. Final Fiscal Invoice and Project Summary. Participating County agrees to submit to the BSCC a Final Fiscal Invoice and Project Summary on the appropriate form provided to the Participating County within forty-five (45) calendar days of the scheduled construction completion date identified in Exhibit B. The report shall include, but not be limited to, total state funds and match expenditures made by budget division, total State Financing received, remaining State Financing requested, number of BSCC-rated beds added and modified, number of special use beds added and modified, and a detailed description of the finished Project including pre-construction and post-construction photographs or other visual material suitable for public distribution. For purposes of this Exhibit A, “**BSCC-rated beds**” means the number of beds dedicated to housing adult offenders for which a facility’s single- and double-occupancy cells/rooms or dormitories were planned and designed in conformity to the standards and requirements contained in Titles 15 and 24 of the CCR. “**Special use beds**” means beds for the purpose of appropriately housing offenders in medical, mental health, or disciplinary rooms, cells or units that are planned and designed in conformity to the standards and requirements contained in Titles 15 and 24 of the CCR.

ARTICLE 8. WITHHOLDING OF STATE DISBURSEMENTS

A. BSCC may withhold all or any portion of the State Financing provided for by this Agreement in the event that:

1. Participating County Breach of Agreement. Participating County has materially and substantially breached the terms and conditions of this Agreement or any other Project Document.
2. Insufficient County Funds. Participating County is unable to demonstrate, to the satisfaction of the BSCC’s Executive Director, continuous availability of sufficient funds to complete the Project.
3. Insufficient Match Disbursement. Participating County has not expended its Cash (hard) Match requirement on a schedule that is at least pro-rata with the percentage expenditure of, collectively, interim financing and lease-revenue bond funds.

B. In the event that State Financing is withheld from the Participating County, the BSCC’s Executive Director or designee shall notify the Participating County of the reasons for withholding and advise the Participating County of the time within which the Participating County may remedy the failure or violation leading to the withholding.

The BSCC will not reimburse counties for costs identified as ineligible for State Financing. If State Financing has been provided for costs subsequently discovered to be ineligible, the BSCC may either withhold an equal amount from subsequent payments to the

Participating County or require repayment of an equal amount to the State by the Participating County. Any State Financing so remitted to the BSCC may be subject to interest equal to the rate earned by the State Pooled Money Investment Account.

ARTICLE 9. DISBURSEMENT

Participating County shall be paid in arrears on invoices of expenditures and requests for funds submitted to BSCC at mutually agreed upon intervals, see Article 7(A), on the Fiscal Invoice and Progress/Final Report. Participating County shall supply BSCC with appropriate expenditure documentation and request for funds on form(s) provided by BSCC and certify to the accuracy of the report(s) in accordance with generally accepted governmental accounting principles and BSCC regulations, guidelines, policies and procedures. Participating County shall further certify that all listed expenditures are actual and that all funds were expended for the purpose of liquidating obligations identified in Exhibit B and legally incurred.

The State will issue a warrant for eligible funds within approximately thirty (30) to sixty (60) days of receipt of Participating County invoice and documentation of eligible expenditures. All requests for payment shall be accompanied by any documentation as may be required by BSCC or the Board and with such certification(s) as may be required by BSCC.

ARTICLE 10. DISPUTES

Participating County shall continue with the responsibilities under this Agreement during any disputes. Except as otherwise provided in this Agreement, any dispute concerning a question of fact arising under, or relating to, the performance of this Agreement which is not resolved by agreement between Participating County and BSCC staff shall be decided by the BSCC. This clause does not preclude consideration of legal questions; nothing in this Agreement shall be construed as making final the decision of any administrative official, representative, or BSCC on a question of law.

Participating County may appeal on the basis of alleged misapplication, capricious enforcement of regulations, or substantial differences of opinion as may occur concerning the proper application of regulations or procedures. Such appeal shall be filed within thirty (30) calendar days of the notification of the action with which the Participating County is dissatisfied. The request shall be in writing stating the basis for the dissatisfaction and the action being requested of the BSCC.

A hearing shall be conducted by a hearing panel designated by the Chairperson of the BSCC Board at a reasonable time, date, and place, but not later than twenty-one (21) calendar days after the filing of the request for hearing with BSCC, unless delayed for good cause. BSCC shall mail or deliver to the appellant or authorized representative a written notice of the time and place of hearing not less than fourteen (14) calendar days prior to the hearing. The procedural time requirements may be waived with mutual written consent of the parties involved.

Appeal hearing matters shall be set for hearing, heard, and disposed of by a notice of decision by the BSCC Board within ninety (90) calendar days from the date of the request for appeal hearing, except in those cases where the appellant withdraws or abandons the request for hearing or the matter is continued for what is determined by the hearing panel to be good cause.

An appellant may waive a personal hearing before the hearing panel and under such circumstances, the hearing panel shall consider the written information submitted by the appellant and other relevant information as may be deemed appropriate.

The hearing is not formal in nature. Pertinent and relevant information, whether written or oral, will be accepted. Hearings will be tape recorded. After the hearing has been completed, the hearing panel shall submit an advisory recommendation on the matter to the BSCC Board. The decision of the BSCC Board shall be final.

Notwithstanding any other provision of this Article 10, this Article 10 shall not limit any other rights or remedies available to the State or any other Agency under any other Project Document including, without limitation, the PDCA.

ARTICLE 11. REMEDIES

Participating County agrees that any remedy provided in this Agreement is in addition to and not in derogation of any other legal or equitable remedy available to the BSCC as a result of breach of this Agreement by the Participating County, whether such breach occurs before or after completion of the Project. In the event of litigation between the Parties hereto arising from this Agreement, it is agreed that the prevailing Party shall be entitled to such reasonable costs and/or attorney fees and costs as may be ordered within the discretion of the Court.

ARTICLE 12. WAIVER

The Parties hereto may, from time to time, waive any of their rights under this Agreement unless such waiver is contrary to law, provided that any such waiver shall be in writing and signed by the Party making such waiver.

EXHIBIT B

PROJECT DESCRIPTION AND BUDGET

Capitalized terms not defined in this Exhibit B shall have the meaning as set forth in the Agreement to which this Exhibit B is attached.

County (County):

Name of Facility Subject to Construction:

SECTION 1. PROJECT DESCRIPTION

Provide a description of the Project scope as presented in Exhibit A of the PDCA.

SECTION 2. PROJECT TIMETABLE

Provide an updated Project timetable to include start and completion dates for each of the following key events: 1) Schematic Design and Operational Program Statement; 2) Design Development with Staffing Plan; 3) Staffing/Operating Cost Analysis; 4) Construction Documents; 5) Construction Bids; 6) Notice to Proceed; 7) Construction; and 8) Occupancy. Note that construction should be substantially complete within three (3) years from Notice to Proceed and occupancy must occur within ninety (90) days of Final Completion.

SECTION 3. CONSTRUCTION MANAGEMENT PLAN

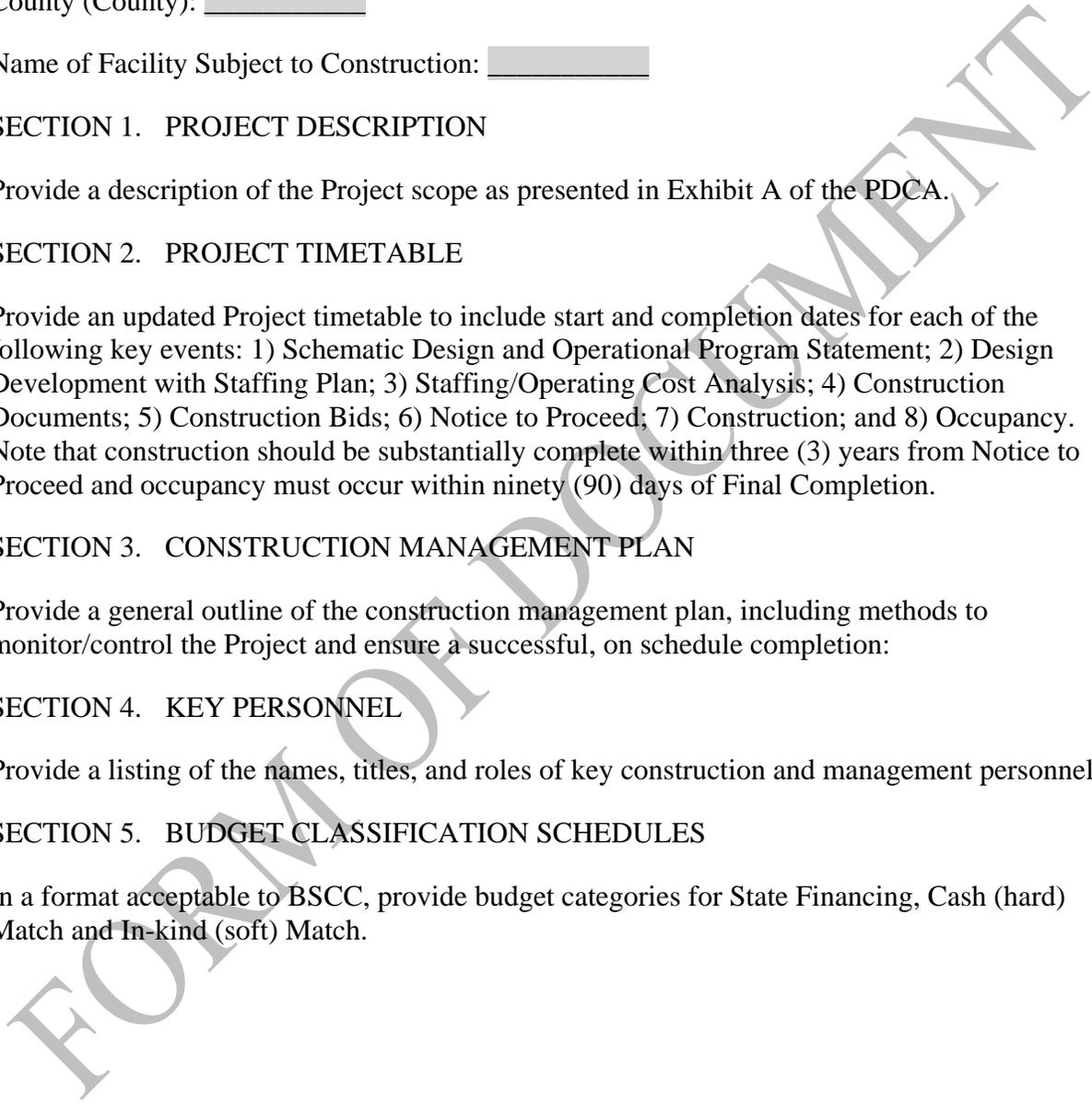
Provide a general outline of the construction management plan, including methods to monitor/control the Project and ensure a successful, on schedule completion:

SECTION 4. KEY PERSONNEL

Provide a listing of the names, titles, and roles of key construction and management personnel:

SECTION 5. BUDGET CLASSIFICATION SCHEDULES

In a format acceptable to BSCC, provide budget categories for State Financing, Cash (hard) Match and In-kind (soft) Match.



**PROJECT DELIVERY AND CONSTRUCTION AGREEMENT
AB 900 JAIL FINANCING PROGRAM**

by and among

**STATE PUBLIC WORKS BOARD
OF THE STATE OF CALIFORNIA**

and

**DEPARTMENT OF CORRECTIONS AND REHABILITATION
OF THE STATE OF CALIFORNIA**

and

**BOARD OF STATE AND COMMUNITY CORRECTIONS
OF THE STATE OF CALIFORNIA**

and

[PARTICIPATING COUNTY]

Effective Date of [] [], 20 []

**(FOR A JAIL FACILITY
LOCATED IN THE COUNTY OF [])**

TABLE OF CONTENTS

	Page
ARTICLE 1 GENERAL	3
1.1 General Covenants, Acknowledgements and Agreements of the Parties	3
1.2 Approvals, Consents and Actions Necessary to Maintain Eligibility in the AB 900 Jail Financing Program.....	3
1.3 AB 900 Jail Lease Revenue Bond Financing	5
1.4 The Department and the BSCC Act as Liaison of the Board and Finance to the Participating County	6
1.5 Representations and Warranties of the Participating County	6
1.6 Representations and Warranties of the Board.....	7
1.7 Representations and Warranties of the Department and the BSCC.....	7
1.8 Compliance with Terms and Conditions of the Project Documents.....	8
1.9 Conflicts Between Terms of Documents	8
1.10 Indemnity	8
1.11 Assignment or Subletting of the Facility	9
1.12 Relationship of the Parties	9
ARTICLE 2 TERM AND TERMINATION OF AGREEMENT	10
2.1 Term of Agreement.....	10
2.2 Termination of Agreement.....	10
ARTICLE 3 COST SHARING OF THE PROJECT	11
3.1 Financing Eligibility of the Project.....	11
3.2 Excess Project Costs	12
3.3 Project Cost Savings	12
ARTICLE 4 PROJECT SCOPE, COST AND SCHEDULE.....	12
4.1 The Project	12
4.2 Modification of Project Scope, Cost or Schedule.....	12
4.3 Excess Project Costs	13
ARTICLE 5 BIDDING AND DESIGN-BUILD PHASE OF THE PROJECT	13
5.1 Design-Build Covenant of the Participating County	13
5.2 Procurement and Enforcement of Design-Build Contract.....	14
5.3 Completion of the Project	14
5.4 Project Access.....	14
5.5 Insurance	14
ARTICLE 6 CERTAIN OBLIGATIONS POST PROJECT COMPLETION	16
6.1 Private Use of the Project	16
6.2 No Liens.....	17
ARTICLE 7 RECORD RETENTION	17
7.1 Establishment of Official Project File.....	17
7.2 Preservation of Records	17

TABLE OF CONTENTS
(continued)

	Page
ARTICLE 8 MISCELLANEOUS	17
8.1 Entire Agreement	17
8.2 Amendment.....	17
8.3 Waiver.....	17
8.4 Counterparts.....	18
8.5 Headings	18
8.6 Further Assurances.....	18
8.7 Survival	18
8.8 Governing Law	18
8.9 Compliance with Laws	18
8.10 Partial Invalidity.....	18
8.11 Notices	18
8.12 Force Majeure	19
8.13 Exculpation	19
8.14 Benefits of this Agreement Limited to the Parties.....	20
EXHIBIT A PROJECT SCOPE, COST AND SCHEDULE DESCRIPTION	A-1
EXHIBIT B FORM OF GROUND LEASE	B-1
EXHIBIT C FORM OF RIGHT OF ENTRY FOR CONSTRUCTION AND OPERATION	C-1
EXHIBIT D FORM OF FACILITY SUBLEASE.....	D-1
EXHIBIT E-1 DESCRIPTION OF PARTICIPATING COUNTY FUNDING Cash (Hard) Match.....	E-1
EXHIBIT E-2 DESCRIPTION OF PARTICIPATING COUNTY FUNDING In-kind (Soft) Match	E-2

**PROJECT DELIVERY AND CONSTRUCTION AGREEMENT
AB 900 JAIL FINANCING PROGRAM
(FOR A JAIL FACILITY
LOCATED IN _____ COUNTY)**

This PROJECT DELIVERY AND CONSTRUCTION AGREEMENT (this “Agreement”) is entered into as of _____, 20____, (the “Effective Date”) by and among the STATE PUBLIC WORKS BOARD OF THE STATE OF CALIFORNIA (the “Board”), an entity of state government of the State of California (the “State”), the DEPARTMENT OF CORRECTIONS AND REHABILITATION OF THE STATE OF CALIFORNIA (the “Department”), an entity of state government of the State, the BOARD OF STATE AND COMMUNITY CORRECTIONS OF THE STATE OF CALIFORNIA (the “BSCC”), an entity of state government of the State, and the COUNTY OF _____ (the “Participating County”), a Political Subdivision of the State. For purposes of this Agreement, the Board, the Department, the BSCC and the Participating County are referred to collectively as the “Parties,” and individually as a “Party.” The Board, the Department and the BSCC are referred to collectively herein, as the “Agencies” and individually as an “Agency.”

WHEREAS, pursuant to Chapter 3.12 of Part 10b of Division 3 of Title 2 of the California Government Code (commencing at Section 15820.91) (the “Law”), the Board is authorized to finance the acquisition, design and construction of a jail facility approved by the BSCC pursuant to Section 15820.916 of the California Government Code (the “AB 900 Jail Financing Program”); and

WHEREAS, pursuant to California Code of Regulations Title 15, Division 1, Chapter 1, Subchapter 6 and this Agreement and other agreements relating to this Project, the cost of certain design and construction activities will be eligible for reimbursement under the AB 900 Jail Financing Program; and

WHEREAS, the Participating County has proposed to build or renovate a jail facility, as more particularly described in **Exhibit A** attached hereto (the “Project”), to be located at _____, real property controlled by the Participating County through fee-simple ownership (the “Site”); and

WHEREAS, the Participating County intends to lease the Site to the Department pursuant to a Ground Lease in substantially the form attached hereto as **Exhibit B** (the “Ground Lease”) executed by and between the Participating County and the Department and consented to by the Board; and

WHEREAS, the Department, as lessee under the Ground Lease, and the Participating County intend to enter a Right of Entry for Construction and Operation (the “Right of Entry”) in substantially the form attached hereto as **Exhibit C** concurrently with the execution of the Ground Lease authorizing the Participating County to enter the Site for the purpose of constructing the Project on the Site and for operation of the Project upon substantial completion of construction (the Site and the Project, collectively, the “Facility”), as more particularly described herein; and

WHEREAS, concurrently with the execution of this Agreement, the BSCC and the Participating County, with the consent of the Board and the Department, intend to enter into an agreement to assist in complying with BSCC's rules and regulations concerning jail construction for the AB 900 Jail Financing Program (the "BSCC Agreement"); and

WHEREAS, the Board intends to oversee and issue lease revenue bonds for the Project, subject to satisfaction of certain conditions and requirements of the Board, including but not limited to establishment of Project scope, cost and schedule; approval of performance criteria; involvement in approval of the Design-Build Solicitation Package (as hereinafter defined) and authorization for the Participating County to solicit design-build bids or proposals; requesting actions to be taken to obtain one or more interim loans in connection with the Project (the "Interim Loan") and, subject to section 1.3 below, the Board intends to issue and sell its lease revenue bonds to repay the Interim Loan and provide additional financing for the Project, as necessary (the "Bonds"); and

WHEREAS, prior to authorization by the Board of actions to be taken to provide for the Interim Loan, the Department shall have certified to the Board that the Participating County is a participating county as required by Section 15820.91 of the California Government Code and the BSCC shall have approved the Project in accordance with Section 15820.911 of the California Government Code; and

WHEREAS, an Interim Loan for the Project may be made pursuant to Sections 16312 and 16313 of the California Government Code (Pooled Money Investment Board loans), Section 15849.1 of the California Government Code (General Fund loans), and/or any other appropriate source in an amount or amounts, which in the aggregate do not exceed the Maximum State Financing (as hereinafter defined); and

WHEREAS, the agent for sale for all Board bonds is the State Treasurer; and

WHEREAS, concurrently with the issuance of the Bonds, the Department, as lessee under the Ground Lease, intends to enter into a Site Lease whereby the Department, as lessor, shall lease the Site to the Board, as lessee (the "Site Lease"); and

WHEREAS, concurrently with the execution of the Site Lease, the Board, as lessee under the Site Lease, intends to enter into a Facility Lease whereby the Board, as lessor, shall lease the Facility to the Department, as lessee (the "Facility Lease"); rental payments under the Facility Lease shall secure the payment of principal of and interest on the Bonds; and

WHEREAS, concurrently with the execution of the Facility Lease, the Department, as lessee under the Facility Lease, and the Participating County intend to enter a Facility Sublease in substantially the form attached hereto as **Exhibit D**, whereby the Department, as sublessor, shall lease the Facility to the Participating County, as sublessee (the "Facility Sublease"), for its use, operation and maintenance; and

WHEREAS, in the event the Board is unable to issue the Bonds to finance the Project and the Interim Loan has been provided, the Department shall commit a sufficient amount of its annual support appropriation to repay the Interim Loan and any other interim financing costs associated with the Interim Loan.

NOW, THEREFORE, FOR AND IN CONSIDERATION of the mutual agreements of the Parties set forth herein and other good and valuable consideration, the adequacy and sufficiency of which are hereby acknowledged by the Parties, and intending to be legally bound, the Parties hereby agree as follows:

ARTICLE 1

GENERAL

1.1 General Covenants, Acknowledgements and Agreements of the Parties.

(a) The Parties hereto acknowledge and agree that an authorization by the Board to request the Interim Loan and the issuance of the Bonds by the Board is done in reliance upon, among other things, the promise of the relevant Parties to execute, deliver and perform their respective obligations, as applicable, under the Site Lease, the Facility Lease, the Facility Sublease, a Tax Agreement and Certificate in a form satisfactory to the Board to be executed in connection with the issuance of the Bonds (the "Tax Certificate"), a Continuing Disclosure Agreement in a form satisfactory to the Board to be executed in connection with the issuance of the Bonds (the "Continuing Disclosure Agreement") and all related certificates, agreements or other documents, including an indenture and supplemental indenture, if any, authorizing the Bonds that the Chair or Executive Director of the Board or a duly authorized designee thereof may deem necessary or desirable to effectuate the sale of the Bonds. Such indenture, supplemental indenture, if any, the Site Lease, the Facility Lease, the Facility Sublease, the Tax Certificate and the Continuing Disclosure Agreement, are collectively referred to herein as the "Bond Documents."

(b) The Parties accept and agree to comply with, to the extent respectively applicable to them, all terms, provisions, conditions, and commitments of this Agreement, the Project Documents (as hereinafter defined) and the Bond Documents, including all incorporated documents, and that they will do and perform all acts and things permitted by law to effectuate the issuance of the Bonds.

(c) The Participating County, the Department and the BSCC agree and acknowledge that the Project is subject to approval and oversight by the Board and the State Department of Finance ("Finance") consistent with the policies and laws governing the expenditure of a State capital outlay appropriation.

1.2 Approvals, Consents and Actions Necessary to Maintain Eligibility in the AB 900 Jail Financing Program. The Participating County acknowledges its eligibility for Project financing pursuant to the AB 900 Jail Financing Program is subject to and contingent upon the following approvals, consents and actions:

(a) A determination by the Board that the Site meets the standard requirements for a site being leased in connection with the issuance by the Board of its lease revenue bonds;

(b) A determination by the Board that the Participating County match as set forth in Article 3 has been satisfied as required by the Law and the source of the Cash (hard)

Match (as hereinafter defined) and any associated security or terms related thereto has been determined by the Board to be compatible with the financing of the Project pursuant to the AB 900 Jail Financing Program;

(c) The Board has established the scope, cost and schedule for the Project consistent with the Participating County's initial proposal submitted to the BSCC and the Participating County has agreed that the Project shall be constructed and completed in accordance with such Project scope, cost and schedule established by the Board, except to the extent any modifications thereof may be approved by the Board through the State's standard capital outlay process;

(d) The Board has approved the Ground Lease, the Right of Entry and the Facility Sublease;

(e) Both the Board and Finance have approved the Performance Criteria for the Project. As used herein "Performance Criteria" shall mean the information that fully describes the scope of the proposed project and includes, but is not limited to, the size, type, and design character of the buildings and site; the required form, fit, function, operational requirements, and quality of design, materials, equipment, and workmanship; and any other information deemed necessary to sufficiently describe the Participating County's needs; including documents prepared pursuant to paragraph (1) of subdivision (a) of Section 22164 of the California Public Contract Code. Performance Criteria may include concept drawings, which include any schematic drawings or architectural renderings that are prepared in such detail as the Participating County determines necessary to sufficiently describe the Participating County's needs;

(f) Finance has approved the Design-Build Solicitation Package for the Project and authorized the Participating County to proceed with soliciting competitive bids or proposals for design and construction of the Project. As used herein "Design-Build Solicitation Package" shall mean the performance criteria, the form of contract, and all other documents and information that serve as the basis on which competitive bids or proposals will be solicited from the design-build entities;

(g) Finance has approved award of the Design-Build Contract (as hereinafter defined) for the Project;

(h) BSCC and the State Fire Marshal have approved the Construction Documents for the Project. As used herein "Construction Documents" shall mean architectural plans and specifications that are one hundred percent (100%) complete and generally include: completed specifications and construction drawings; and special interest items (corrections, modifications, or additions made to the documents). The Construction Documents shall include a complete set of plans and specifications showing and describing all phases of a project, architectural, structural, mechanical, electrical, civil engineering, and landscaping systems to the degree necessary for the purposes of construction by the design-build entity;

(i) The Department has provided the Board the certification required by Section 15820.91 of the California Government Code, which certification the Department intends to provide upon satisfaction of the required statutory and regulatory conditions;

(j) The Board has adopted a Resolution authorizing steps be taken to seek the Interim Loan together with declaring its intent to reimburse any such Interim Loan with the proceeds from the Bonds;

(k) A determination by the Board that it will receive with respect to the Bonds the normal and customary opinions and certificates delivered in connection with an issuance of lease revenue bonds by the Board; and

(l) The sale of the Bonds.

1.3 AB 900 Jail Lease Revenue Bond Financing. State financing for the AB 900 Jail Financing Program is predicated on the Board's ability to issue Bonds for the Project. The Board, acting in good faith, intends to authorize the request for the Interim Loan and, subject to approvals, consents, and actions set forth in section 1.2, to issue Bonds for the Project. The Agencies will make reasonable and good faith efforts to assist in gaining assurance that the Site, the Project, the Participating County's ultimate use of the Project and the Cash (hard) Match (as hereinafter defined) are developed and implemented in such a way to facilitate the financing of the Project through the issuance and sale of the Bonds.

Prior to the Board's authorization to request the Interim Loan, the Department shall have certified to the Board that the Participating County is a participating county as required by Section 15820.91 of the California Government Code and the BSCC shall have approved the design and construction of the Project in accordance with Section 15820.911 of the California Government Code. Certification from the Department to the Board regarding BSCC and State Fire Marshal approval of the Construction Documents must be provided as soon as those approvals have been received and before the issuance and sale of the Bonds.

Notwithstanding the Board's good faith efforts to authorize and provide financing for the Project, the State (including without limitation the Board, the Department, and the BSCC) shall not be obligated to issue Bonds for the Project or authorize the Interim Loan request upon the Board's good-faith determination that such financing is not feasible or appropriate, based upon any one or more of the following factors: the lack of suitability of the Project's configuration or site for lease revenue bond financing, local funding that is incompatible with the issuance of lease revenue bonds by the Board, adverse market conditions, adverse outcomes to legal challenges, inability to obtain access to the financial markets or inability to obtain reasonable rates, inability to receive opinions and certificates customarily delivered in connection with the issuance of lease revenue bonds, or another occurrence or state of affairs that would make it objectively infeasible or inappropriate for the Board to issue Bonds or authorize the Interim Loan request.

In the event the Board determines that it is not feasible or appropriate to issue Bonds or to authorize the Interim Loan request, the Participating County is not entitled to receive the Maximum State Financing (as hereinafter defined) or other State funding for the Project, and shall not receive reimbursement from the State for any Project costs. However, in the event the Board is unable to issue the Bonds to finance the Project and the Interim Loan has been provided, the Department shall commit a sufficient amount of its annual support appropriation to repay the Interim Loan and any other interim financing costs associated with the Interim Loan and all associated costs.

1.4 The Department and the BSCC Act as Liaison of the Board and Finance to the Participating County. The Parties hereto acknowledge that obtaining the approvals and consents of the Board and/or Finance and the provision of documents to the Board and/or Finance as set forth in this Article I and otherwise herein shall be a responsibility of the Department and the BSCC. The Department and the BSCC will act as liaisons between the Participating County and the Board and Finance, and on their own behalf and behalf of the Board and Finance, will work with the Participating County to obtain such consents and approvals, and to provide such documents to the Board and Finance, as applicable.

1.5 Representations and Warranties of the Participating County.

(a) Under the provisions of the State Constitution, the applicable State statutes, and applicable jurisprudence of the State, the Participating County has the power to enter into this Agreement, to be bound hereby, to consummate the transactions contemplated hereby and to perform its obligations hereunder.

(b) The Participating County has taken all actions and has obtained all consents necessary to enable the Participating County to enter into this Agreement, to be bound hereby, to consummate the transactions contemplated hereby and to perform its obligations hereunder.

(c) The person executing and delivering this Agreement on behalf of the Participating County has been duly authorized and empowered to do so.

(d) The execution and delivery of this Agreement on behalf of the Participating County will bind and obligate the Participating County to the extent provided by the terms hereof.

(e) There exists no litigation or other proceeding pending or threatened against the Participating County that, if determined adversely, would materially and adversely affect the ability of the Participating County to consummate the transactions contemplated hereby or to perform its obligations hereunder.

(f) The execution and delivery of this Agreement and the Ground Lease, the Right of Entry, the BSCC Agreement and the Facility Sublease, the consummation of the transactions herein and therein contemplated and the fulfillment of or compliance with the terms and conditions hereof and thereof, will not conflict with or constitute a violation or material breach of or default (with due notice or the passage of time or both) under any applicable law or administrative rule or regulation, or any applicable court or administrative decree or order, or any indenture, mortgage, deed of trust, loan agreement, lease, contract or other agreement or instrument to which the Participating County is a party or by which it or its properties are otherwise subject or bound, or result in the creation or imposition of any lien, charge or encumbrance of any nature whatsoever upon any of the property or assets of the Participating County, which conflict, violation, breach, default, lien, charge or encumbrance might have consequences that would materially and adversely affect the consummation of the transactions contemplated by this Agreement, the Ground Lease, the Right of Entry, the BSCC Agreement or the Facility Sublease, or the financial condition, assets, properties or operations of the Participating County.

1.6 Representations and Warranties of the Board.

(a) Under the provisions of the State Constitution, the applicable State statutes, and applicable jurisprudence of the State, the Board has the power to enter into this Agreement, to be bound hereby, to consummate the transactions contemplated hereby and to perform its obligations hereunder.

(b) The Board has taken all actions and has obtained all consents necessary to enable the Board to enter into this Agreement, to be bound hereby, to consummate the transactions contemplated hereby and to perform its obligations hereunder.

(c) The person executing and delivering this Agreement on behalf of the Board has been duly authorized and empowered to do so.

(d) The execution and delivery of this Agreement on behalf of the Board will bind and obligate the Board to the extent provided by the terms hereof.

(e) There exists no litigation or other proceeding pending against the Board (with service of process having been accomplished) that, if determined adversely, would materially and adversely affect the ability of the Board to consummate the transactions contemplated hereby or to perform its obligations hereunder.

1.7 Representations and Warranties of the Department and the BSCC.

(a) Under the provisions of the State Constitution, the applicable State statutes, and applicable jurisprudence of the State, the Department and the BSCC each have the power to enter into this Agreement, to be bound hereby, to consummate the transactions contemplated hereby and to perform its obligations hereunder.

(b) The Department and the BSCC have each taken all actions and have obtained all consents necessary to enable the Department and the BSCC to enter into this Agreement, to be bound hereby, to consummate the transactions contemplated hereby and to perform its obligations hereunder.

(c) The persons executing and delivering this Agreement on behalf of the Department and the BSCC have been duly authorized and empowered to do so.

(d) The execution and delivery of this Agreement on behalf of the Department and the BSCC will bind and obligate the Department and the BSCC to the extent provided by the terms hereof.

(e) There exists no litigation or other proceeding pending against the Department or the BSCC (with service of process having been accomplished) that, if determined adversely, would materially and adversely affect the ability of the Department or the BSCC to consummate the transactions contemplated hereby or to perform its obligations hereunder.

(f) The execution and delivery of this Agreement and the Ground Lease, the Right of Entry, the Site Lease, the Facility Lease, the BSCC Agreement and the Facility Sublease, the consummation of the transactions herein and therein contemplated and the

fulfillment of or compliance with the terms and conditions hereof and thereof, will not conflict with or constitute a violation or breach of or default (with due notice or the passage of time or both) under any applicable law or administrative rule or regulation, or any applicable court or administrative decree or order, or any indenture, mortgage, deed of trust, loan agreement, lease, contract or other agreement or instrument to which the Department or the BSCC is a party or by which it or its properties are otherwise subject or bound, or result in the creation or imposition of any lien, charge or encumbrance of any nature whatsoever upon any of the property or assets of the Department or the BSCC, which conflict, violation, breach, default, lien, charge or encumbrance might have consequences that would materially and adversely affect the consummation of the transactions contemplated by this Agreement, the Ground Lease, the Right of Entry, the BSCC Agreement or the Facility Sublease, or the financial condition, assets, properties or operations of the Department or the BSCC.

1.8 Compliance with Terms and Conditions of the Project Documents. The Parties agree to comply with all terms and conditions relating to the respective Party of this Agreement, the BSCC Agreement, the Ground Lease, the Right of Entry and all exhibits and schedules attached hereto and thereto relating to the Party (collectively, the “Project Documents”), as well as all applicable laws including, without limitation, the Law and those laws, regulations and guidelines set forth in the BSCC Agreement.

1.9 Conflicts Between Terms of Documents. In the event of any inconsistency in the Project Documents, except as otherwise provided herein, the inconsistency shall be resolved by giving precedence in the following order: 1) this Agreement; 2) the Ground Lease, 3) the BSCC Agreement and all exhibits and schedules attached thereto, and 4) the Right of Entry. In the event the Bonds are issued, any inconsistency between the Project Documents and the Bond Documents shall be resolved by giving precedence to the Bond Documents. To the extent the Parties mutually agree that a provision of a particular document should control with respect to an inconsistency between that document and another document or documents, notwithstanding the other provisions of this section, such provision shall control.

1.10 Indemnity. As required by Section 15820.911(d) of the California Government Code, the Participating County hereby agrees to indemnify, defend and save harmless the State, including but not limited to the Board, the Department and the BSCC, and each of their respective officers, governing members, directors, officials, employees, subcontractors, consultants, and agents (collectively, “Indemnitees”) for any and all claims and losses arising at any time out of the acquisition, design, construction, operation, maintenance, use and occupancy of the Project. The Participating County shall not be obligated to provide indemnity or defense where the claim arises out of the gross negligence or willful misconduct of the Indemnitees. These obligations shall survive any termination of this agreement.

1.11 Assignment or Subletting of the Facility.

(a) *Assignment of Rights and Interest under this Agreement.* Except as otherwise contemplated hereunder, the Participating County may not sublicense, assign, or otherwise confer upon any other person or entity its rights or interests under this Agreement, nor may the Participating County delegate any of its duties or responsibilities required by this Agreement, whether by operation of law or otherwise, without the express, prior written consent of the Agencies, the rights and obligations hereunder imposed being personal to the Participating County.

(b) *Assignment or Subletting of the Facility.* The Participating County and the Department hereby covenant and agree that none of the Ground Lease, the Facility Lease or the Facility Sublease nor any interest of such Parties thereunder shall be sold, mortgaged, pledged, assigned, or transferred by the Parties thereto by voluntary act or by operation of law or otherwise; provided, however, that the Facility may be subleased in whole or in part by the Participating County with the prior written consent of the Department and the Board to the form and substance of such sublease, which consent shall not be unreasonably withheld, and, provided further that, any such sublease shall be subject to the following conditions:

(i) Any sublease of the Facility by the Participating County shall explicitly provide that such sublease is subject to all rights of the Department and the Board under the Facility Sublease, including, the right to re-enter and re-let the Facility or terminate such lease upon a default by the Participating County; and

(ii) At the request of the Department or the Board, the Participating County shall furnish the Department, the Board and the State Treasurer with an opinion of nationally-recognized bond counsel acceptable to the Board to the effect that such sublease will not, in and of itself, cause the interest on the Bonds to be included in gross income for federal income tax purposes.

(c) *Restrictions on Private Use of the Facility.* The Participating County acknowledges that its ability to assign or sublet the Facility is subject to the provisions of section 6.1.2 hereof.

1.12 Relationship of the Parties. The Parties hereto acknowledge and agree that, to the extent expressly provided in this Agreement, the relationship of the Participating County to the Agencies is that of an agent to the Agencies and that the Participating County is principally responsible for the acquisition, design, construction, maintenance, and operation of the Project. Other than as set forth herein, nothing in this Agreement shall create between the Participating County and any of the Agencies the relationship of joint venturers, partners or any other similar or representative relationship, and the Participating County shall not hold itself out as an agent (except as expressly provided herein), representative, partner, member or joint venturer of the Agencies. The Participating County shall not make for or on behalf of the Agencies, or subject the Agencies to, any contract, agreement, warranty, guaranty, representation, assurance or other obligation, which has not been approved in advance in writing by the applicable Agency. This Agreement is for the sole and exclusive benefit of the Parties hereto and their respective successors and assigns, and no third party (including without limitation the owners of the Bonds) is intended to or shall have any rights hereunder.

ARTICLE 2

TERM AND TERMINATION OF AGREEMENT

2.1 Term of Agreement. This Agreement shall commence on the Effective Date and shall terminate upon the later of (i) completion of the construction of the Project or (ii) if the Board issues the Bonds, execution and delivery of the Facility Sublease, unless terminated earlier as provided in section 2.2. The provisions of certain sections hereof as indicated by the express terms thereof will survive termination of this Agreement.

2.2 Termination of Agreement.

(a) *Termination by the State.* The Department or the BSCC, with the consent of the Board, or the Board may terminate this Agreement in the event any of the following occurs:

(i) The Participating County's breach of a material term of this Agreement, any Project Document or any Applicable Laws (as defined in the BSCC Agreement) provided the Participating County has not cured such breach in all respects within thirty (30) days from notice of said breach, which cure period may be extended for a reasonable time with the consent of the Agencies if the Participating County demonstrates that such additional time is required to cure such breach in a diligent and commercially reasonable manner;

(ii) Substantive alteration of the Board approved scope, cost or schedule for the Project as set forth in **Exhibit A** without the prior written approval of the Board;

(iii) Failure to execute the Ground Lease or the Right of Entry;

(iv) Failure to provide the Participating County Funding (as hereinafter defined) when and as required under this Agreement, the Law or any Project agreement to which the Participating County is a party;

(v) In the event the Board determines the Participating County is no longer eligible for Project financing under the AB 900 Jail Financing Program as set forth in section 1.2 hereof; or

(vi) Termination of the BSCC Agreement as provided for in Article 1, Section C of the BSCC Agreement.

(b) *Termination by the Participating County.* The Participating County may, prior to the State providing any amount of financing, terminate this Agreement in the event any of the following occurs:

(i) The State's breach of a material term of this Agreement, any Project Document or any Applicable Laws (as defined in the BSCC Agreement) provided the State has not cured such breach in all respects within thirty (30) days from notice of said breach, which cure period may be extended for a reasonable time with the consent of the Participating County if the State demonstrates that such additional time is required to cure such breach in a diligent and commercially reasonable manner;

(ii) Failure of the State to execute the Ground Lease or the Right of Entry;

(iii) In the event the Board determines the Participating County is no longer eligible for Project financing under the AB 900 Jail Financing Program as set forth in section 1.2 hereof.

(c) *Agreement.* The Parties may terminate this Agreement by mutual agreement. The Agencies agree to terminate this agreement in the event that the Participating County determines it cannot proceed with the Project after initial design-build bids or proposals are received, but before any design-build contract is awarded.

(d) *Notice of Termination.* Prior to terminating this Agreement under the provisions of this Article 2, the Parties shall provide to each other, as applicable, at least thirty (30) calendar days written notice, stating the reason(s) for termination and effective date thereof.

(e) *No Impairment.* Nothing in this Article 2 in any way alters or limits the authority of the Agencies to withhold all or a portion of the Maximum State Financing (as hereinafter defined) in accordance with law or otherwise as permitted hereunder or any other right or remedy available to the State at law or in equity for breach of this Agreement.

ARTICLE 3

COST SHARING OF THE PROJECT

3.1 Financing Eligibility of the Project.

(a) *General.* Subject to the terms and provisions hereof, the costs for design and construction of the Project shall be shared by the State and the Participating County with the State providing financing up to a maximum of [REDACTED] dollars (\$ [REDACTED]) (“Maximum State Financing”) and the Participating County providing the Cash (hard) Match (as hereinafter defined) funding and the In-Kind (soft) Match (as hereinafter defined) funding (collectively, the “Participating County Funding” and together with other Participating County-borne project costs not included as the Participating County Funding and the Maximum State Financing, the “Total Project Costs”). Provided, however, that the Board may provide all or a portion of the Maximum State Financing for Project costs at its discretion as set forth herein. The sources for the Maximum State Financing shall be limited to the proceeds of the Interim Loan, and the proceeds of the Bonds. If Bonds are issued and sold, the proceeds will be used to repay the Interim Loan and to provide additional financing for the Project as appropriate. If the Bonds are issued and sold, in no event or circumstance shall the State or the Agencies be obligated to pay the Participating County under this Agreement or any other Project Document any amount in excess of the Maximum State Financing.

(b) *Cash (hard) Match.* Subject to all terms and provisions of this Agreement, the Participating County agrees to appropriate and spend cash (hard) matching funds for the Project as provided in the BSCC Agreement (“Cash (hard) Match”). **Exhibit E-1** is a detailed description of and certification related to the source or sources of the Cash (hard) Match

and any associated security or terms related thereto as approved by the Agencies, which detail and assurance of has been deemed sufficient by the Board to determine that the use of such funds as the Cash (hard) Match is compatible with the financing of the Project pursuant to the AB 900 Jail Financing Program. Any modifications to the source or sources of the Cash (hard) Match or the associated security and terms related thereto as described in **Exhibit E-1** must be approved by the Agencies. The Participating County shall ensure that all Cash (hard) Match is encumbered prior to Finance approval to proceed to bid the Design-Build Solicitation Package.

(c) *In-Kind (soft) Match.* Subject to all terms and provisions of this Agreement, the Participating County agrees to provide in-kind (soft) match for the Project as provided in the BSCC Agreement (“In-kind (soft) Match”). The Participating County has provided in **Exhibit E-2** a detailed description of the In-kind (soft) Match for the Project as approved by the Agencies. Any modifications to the In-kind (soft) Match as described in **Exhibit E-2** must be approved by the Agencies.

3.2 Excess Project Costs. In no event shall any Project scope, cost, budget or schedule changes be authorized by the Participating County which would cause the amount of Total Project Costs to be exceeded unless the Participating County covenants to fund such excess with lawfully available funds and the Participating County first obtains the consent of the Agencies. The Participating County is solely responsible for any and all cost, expenses or fees of the Project which exceed the Maximum State Financing and the Participating County covenants to use its best efforts to promptly appropriate sufficient amounts to cover such cost, expenses or fees. The Participating County waives any and all claims against any of the Agencies or the State in the event that Total Project Costs exceed the amount initially established by the Board.

3.3 Project Cost Savings. To the extent there exists Project cost savings during the Project the amount of such savings shall be applied first to the Participating County to the extent the Participating County has identified Participating County Funding in an amount more than required by the Applicable Laws (as defined in the BSCC Agreement). Thereafter, cost savings shall be shared by the State and the Participating County on a pro rata basis determined by the percentage of the total amount of Project costs financed by the State and the Participating County Funding, respectively. However, in no case may savings be applied to the Participating County that would (1) result in the State providing financing for activities other than eligible design and construction costs; or (2) result in the Participating County contributing less than the percentage of Total Project Costs required by the Applicable Laws.

ARTICLE 4

PROJECT SCOPE, COST AND SCHEDULE

4.1 The Project. See **Exhibit A** for a description of the scope, cost and schedule of the Project, including a narrative description of the Project, budgeted costs related to the Project and a schedule for completion of design and construction of the Project.

4.2 Modification of Project Scope, Cost or Schedule. No substantial change or other substantial modifications to the Project scope, cost or schedule may be made by the Participating County without prior written permission of Finance and recognition by the Board (“Scope Change”). Minor modifications to the project do not require Finance approval and Board

recognition, but must be documented and reported on routine progress reports to the BSCC as set forth in the BSCC Agreement. Without limiting the foregoing, the Participating County shall notify the Department and the BSCC, and the Department shall in turn notify Finance and the Board upon any of the following events or circumstances that may constitute a Scope Change:

- (a) More than minor changes which affect the design, project configuration, cost or schedule of the Project;
- (b) A delay or change in the substantial completion or final completion dates for the Project;
- (c) A more than minor change to the design, location, size, capacity or quality of major items of equipment;
- (d) A change in approved budget categories, or movement of dollars between budget categories as indicated in the Board approved scope cost and schedule as identified in **Exhibit A**.

As used herein “substantial” is as defined in Section 6863 of the State Administrative Manual. As used herein a minor change is any change which does not rise to the level of a substantial change as defined in Section 6863 of the State Administrative Manual. Finance shall determine whether any reported event or circumstance requires its approval and recognition or other formal action by the Board.

The Participating County agrees that it will give prompt notification in writing to the Department and the BSCC of the occurrence of any of the above events and promptly report, in writing, to the Department and the BSCC any modifications to the Design-Build Contract (as hereinafter defined) with respect to the Project. The Department will provide the aforementioned notices and reports to the Board. The Participating County agrees further that, for purposes of the immediately preceding clause (a) and (c), if unsure whether a particular change is minor it will discuss the appropriate characterization with the Department and the BSCC.

4.3 Excess Project Costs. In no event shall any scope, cost or budget changes be authorized which would cause the amount of Total Project Costs to be exceeded unless the Participating County covenants to fund such excess with lawfully available funds and with the consent of the Agencies and so appropriates such funding.

ARTICLE 5

BIDDING AND DESIGN-BUILD PHASE OF THE PROJECT

5.1 Design-Build Covenant of the Participating County. The Participating County acting as agent of the Board and the Department, hereby covenants and agrees to provide and perform or cause to be performed all activities required to acquire, design and construct the Project on behalf of the Board in accordance with the Participating County’s established policies and procedures for the design and construction of major capital projects such as the Project. The Participating County shall be responsible to contract for all pre-design, design and construction services, and shall manage the day-to-day design and construction of the Project. The

Participating County shall cause the design and construction of the Project to be consistent with the requirements, limitations, and other terms of this Agreement, the other Project Documents, the Law and all Applicable Laws. The Participating County shall also manage all aspects of the development and construction of the Project in accordance with the Project Documents.

5.2 Procurement and Enforcement of Design-Build Contract. The Participating County shall follow and adhere to all pertinent bidding rules and policies applicable to Participating County capital projects of this type and size. If there is an ambiguity as to the applicability of certain contracting rules and/or policies to the Project, the Participating County will seek advice from its counsel, follow that advice and use its best efforts to enforce the general design-build contract (the "Design-Build Contract") between the Participating County and the design-build entity selected by the Participating County.

5.3 Completion of the Project. The Participating County acknowledges it is obligated to undertake and complete the design and construction of the Project in compliance with all of the applicable terms and conditions of the Project Documents and the Participating County agrees to use its best efforts to cause the completion of design and construction of the Project in compliance with the applicable terms and conditions of such documents. The Participating County agrees to complete the Project in accordance with this Agreement and consistent with the scope, cost and schedule established by the Board and attached hereto in **Exhibit A**, as such scope, cost and schedule may be modified with the approval of Finance and the recognition of the Board.

5.4 Project Access. To the extent not inconsistent with the Bond Documents, at all times during design and construction of the Project and after final completion, the Participating County shall provide to employees, subcontractors, and consultants of the Agencies reasonable unrestricted access to observe, monitor and inspect the Project. The Agencies' access to observe, monitor and inspect shall include the right to review all documents and files relating to the Project, as well as construction on the Site, including all tests and inspections relating to design or construction of the Project.

5.5 Insurance.

(a) Insurance Obligations of the Participating County.

(i) Requirements during construction. Not later than the start of construction, and continuing through completion of construction of the Project, the Participating County, at its own cost and expense, shall secure and maintain or cause to be secured and maintained (i) fire, lightning and extended coverage insurance on the Project, which initially may be in the form of a builder's risk policy providing coverage in an amount not less than the construction costs expended for the Project and, if no builder's risk insurance is in effect, shall be in the form of a commercial property policy in an amount equal to one hundred percent (100%) of the then current replacement cost of the Project, excluding the replacement cost of the unimproved real property constituting the Site (except that such insurance may be subject to a deductible clause not to exceed [five hundred thousand dollars (\$500,000) or two million five hundred thousand dollars (\$2,500,000)] for any one loss), and (ii) earthquake insurance (if such insurance is available on the open market from reputable insurance companies at a reasonable cost) on any structure comprising part of the Project in an amount equal to the full insurable value of such

structure or the amount of the attributable portion of the Interim Financing, whichever is less (except that such insurance may be subject to a deductible clause not to exceed [five hundred thousand dollars (\$500,000) or two million five hundred thousand dollars (\$2,500,000)] for any one loss). The extended coverage endorsement shall, as nearly as practicable, cover loss or damage by explosion, windstorm, riot, aircraft, vehicle damage, smoke, vandalism and malicious mischief and such other hazards as are normally covered by such endorsement.

If such policy is expected to expire in accordance with its terms prior to execution of the Facility Sublease, the Participating County shall give written notice to the Agencies forty-five (45) days prior to the expected expiration date.

(ii) Requirements after construction completion. The Participating County, at its own cost and expense, shall secure and maintain or cause to be secured and maintained from an insurance company or companies approved to do business in the State and maintain after completion of construction and/or when placing the Project in operation, the following insurance coverage for the Project:

a. General liability insurance in an amount not less than one million dollars (\$1,000,000) per occurrence. Evidence of such insurance shall be on a General Liability Special Endorsement form and should provide coverage for premises and operations, contractual, personal injury and fire legal liability;

b. By signing this Agreement, the Participating County hereby certifies that it is aware of the provisions of Section 3700, *et seq.*, of the California Labor Code which require every employer to be insured against liability for Workers' Compensation or to undertake self-insurance in accordance with the provisions of that Code, and that it will comply, and it will cause its subtenants and assignees to comply, with such provisions at all such times as they may apply during the term of this Agreement.

c. Auto insurance (written on ISO policy form CA 00 01 or its equivalent) with a limit of not less than one million dollars (\$1,000,000) per occurrence. Such insurance shall include coverage for all "owned," "hired" and "non-owned" vehicles or coverage for any auto.

(iii) Additional Insureds. The Participating County agrees that the Board, the Department, and the BSCC and their respective officers, agents and employees shall be included as additional insured in all insurance required herein.

(iv) Insurance Certificate. Any and all insurance policies related to the Project shall name the Board and the Department as additional insured parties and the Participating County shall deliver to the Agencies a certificate or certificates of insurance authorized by the insurers describing the insurance coverage and stating that it is in full force and effect.

(v) Self-Insurance. Notwithstanding any other provision of this Section, the Participating County may satisfy the insurance obligations hereunder by a combination of commercial insurance, formal risk pooling under the statutory provisions of the State, and/or a self-funded loss reserve in whatever proportions are deemed appropriate by the Participating County. The Participating County shall furnish the Agencies with a certificate or other written

evidence of the Participating County's election to provide or cause to be provided all or part of its coverage under a risk pooling, risk retention, or self-insurance program or any combination thereof.

(b) Insurance Obligations of the Department. If the insurance required in (a)(i) expires in accordance with its terms prior to execution of the Facility Sublease, the Department shall, at its own cost and expense, procure and maintain or cause to be procured and maintained (i) property casualty insurance in an amount equal to one hundred percent (100%) of the then current replacement cost of the Project, excluding the replacement cost of the unimproved real property constituting the Site (except that such insurance may be subject to a deductible clause not to exceed [five hundred thousand dollars (\$500,000) or two million five hundred thousand dollars (\$2,500,000)] for any one loss), and (ii) earthquake insurance (if such insurance is available on the open market from reputable insurance companies at a reasonable cost) on any structure comprising part of the Project in an amount equal to the full insurable value of such structure or the amount of the attributable portion of the Interim Financing, whichever is less (except that such insurance may be subject to a deductible clause not to exceed [five hundred thousand dollars (\$500,000) or two million five hundred thousand dollars (\$2,500,000)] for any one loss). The extended coverage endorsement shall, as nearly as practicable, cover loss or damage by explosion, windstorm, riot, aircraft, vehicle damage, smoke, vandalism and malicious mischief and such other hazards as are normally covered by such endorsement. The property casualty insurance shall be in a form satisfactory and with carriers which are acceptable to the Board.

(c) Disposition of Insurance Proceeds. The Participating County agrees and acknowledges that the Board, in its sole discretion, may elect to use the proceeds of insurance procured pursuant to this Agreement to repay the Interim Loan and related costs. However, in the event of (i) damage or destruction of the Project caused by the perils covered by the insurance procured pursuant to this Agreement and (ii) if the Board elects to repay the Interim Loan and related costs, and (iii) if any insurance proceeds remain after the Interim Loan and related costs have been repaid, and (iv) such remaining insurance proceeds are distributed to the Department, then the Department agrees to distribute such remaining proceeds to the Participating County.

ARTICLE 6

CERTAIN OBLIGATIONS POST PROJECT COMPLETION

6.1 Private Use of the Project.

6.1.1 *Provision of Information Regarding Private Use.* The Participating County acknowledges that under the terms of the Facility Sublease, a form of which is attached hereto as **Exhibit D**, the Participating County will covenant to provide updated information to the Board, the Department and the State Treasurer annually regarding private use, if any, of the Project.

6.1.2 *Restriction on Private Use of Bond Financed Project.* The Participating County acknowledges that under the terms of the Facility Sublease, a form of which is attached hereto as **Exhibit D**, the Participating County will covenant to restrict private use of the Project

as required by the terms thereof.

6.2 No Liens. The Participating County acknowledges that except as permitted under the terms of the Facility Sublease, a form of which is attached hereto as **Exhibit D**, the Participating County will covenant not to allow any liens on the Facility.

ARTICLE 7

RECORD RETENTION

7.1 Establishment of Official Project File. The Participating County shall establish an official file for the Project (the "Official Project File"). The file shall contain adequate documentation of all actions that have been taken with respect to the Project, in accordance with generally accepted government accounting principles and the requirements for record retention for capital projects constructed with the proceeds of tax exempt bonds. The Participating County will provide a copy of such file to the Department upon termination of this Agreement. The documents to be retained shall include, but is not limited to contracts, payment of invoices, transfer of funds and other related accounting records.

7.2 Preservation of Records. The Participating County agrees to protect records adequately from fire or other damage. When records are stored away from the Participating County's principal office, a written index of the location of records stored must be on hand and ready access must be assured. All the Participating County records contained in the Official Project File must be preserved for a minimum of three years after the last date on which no Bonds are outstanding. These records shall be subject at all reasonable times to inspection, examination, monitoring, copying, excerpting, transcribing, and audit by the Agencies or designees, by state government auditors or designees, or by federal government auditors or designees. If any litigation, claim, negotiation, audit, or other action involving the records has been started before the expiration of the relevant time period set forth in the third sentence of this paragraph, the related records must be retained until the completion of the action and resolution of all issues which arise from it if such date is later than the end of the afore-mentioned three-year period.

ARTICLE 8

MISCELLANEOUS

8.1 Entire Agreement. This Agreement constitutes and contains the entire agreement between the Parties hereto with respect to the transactions contemplated hereby and supersedes any prior oral or written understanding or agreement of the Parties with respect to the transactions contemplated hereby.

8.2 Amendment. The Parties may, by mutual agreement in writing, amend this Agreement in any respect.

8.3 Waiver. The Parties hereto may, from time to time, waive any of their rights under this Agreement unless such waiver is contrary to law, provided that any such waiver shall be in writing and signed by the Party making such waiver.

8.4 Counterparts. This Agreement may be executed in one or more counterparts, any one of which need not contain the signatures of more than one Party, but all of which when taken together shall constitute one and the same instrument, notwithstanding that all Parties have not signed the same counterpart hereof.

8.5 Headings. The article and section headings contained in this Agreement are inserted as a matter of convenience and shall not affect in any way the construction or terms of this Agreement.

8.6 Further Assurances. Each of the Parties shall execute such other instruments, documents and other papers and shall take such further actions as may be reasonably required or desirable to carry out the provisions hereof and to consummate the transactions contemplated hereby.

8.7 Survival. The representations, warranties, covenants and agreements made herein or in any certificate or document executed in connection herewith shall survive the execution and delivery hereof or thereof, as the case may be, and all statements contained in any certificate or document delivered by any Party hereto shall be deemed to constitute a representation and warranty made herein by such Party.

8.8 Governing Law. The laws of the State shall govern this Agreement, the interpretation thereof and any right or liability arising hereunder. Any action or proceeding to enforce or interpret any provision of this Agreement shall be brought, commenced or prosecuted in the courts of the State located in the County of Sacramento. All parties expressly assert that Sacramento County is not a forum inconvenience.

8.9 Compliance with Laws. At all times during the performance of this Agreement by the Parties, they shall strictly comply with all applicable governmental, administrative and judicial laws, ordinances, rules, regulations, orders, covenants and findings, including, without limitation, all applicable environmental laws and regulations.

8.10 Partial Invalidity. If any provisions of this Agreement are found by any competent authority to be void or unenforceable, such provision shall be deemed to be deleted from this Agreement and the remaining provisions of this Agreement shall continue in full force and effect.

8.11 Notices. All notices and other official communications between the Parties shall be in writing and shall be given by hand delivery or by recognized overnight courier who maintains verification of delivery (deemed to be duly received on the date delivered), or by registered mail, postage prepaid, return receipt requested (deemed to be duly received five (5) days after such mailing) or by telecopy (deemed to be received on the date sent providing that the facsimile was properly addressed and disclosed the number of pages transmitted on its front sheet and that the transmission report produced indicates that each of the pages of the facsimile was received at the correct facsimile number) to each of the respective Parties as follows:

If to the Board: State Public Works Board
915 L. St., 9th Floor
Sacramento, CA 95814
Attention: Executive Director
Facsimile: 916-449-5739

If to the Department: California Department of Corrections and Rehabilitation
9838 Old Placerville Road, Suite B
Sacramento, CA 95827
Attention: Deputy Director, Facility Planning, Construction and
Management
Facsimile: 916-322-5717

If to the BSCC: Board of State and Community Corrections
2590 Venture Way, Suite 200
Sacramento, CA 95833
Attention: Executive Director
Facsimile: 916-327-3317

If to the Participating County: County of [REDACTED]
[Street Address]
[City, State and Zip Code]
Attention: [REDACTED]
Facsimile: [REDACTED]

or to such other address or number for any of the Parties hereto as may from time to time be designated by notice given by such Party to the other Parties in the manner hereinabove provided.

8.12 Force Majeure. None of the Parties shall be liable or responsible for any delay or failure resulting from (and the times for performance by the Parties hereunder shall be extended by the duration of) causes beyond the control of, and without the fault or negligence of, such Party, including without limitation acts of God, acts of the public enemy, acts of war or terrorism, acts of the government or governmental or quasi-governmental agency or instrumentality, significant market disruptions, fires, floods, earthquakes, epidemics, quarantine restrictions, strikes, civil commotion, casualties, embargoes, severe or inclement weather beyond that usually encountered in [REDACTED] County, California, shortages in labor or materials, or similar cause.

8.13 Exculpation. Notwithstanding anything to the contrary contained in this Agreement, in any Bond Document, Project Document or other certificate, agreement, document or instrument executed in connection with the AB 900 Jail Financing Program, the liability of the Board hereunder shall be limited to and satisfied solely out of proceeds of the Interim Loan, if any, or the Bonds, if any, permitted to be used for such purpose. Except as provided above, the Participating County shall not have the right to obtain payment from the Agencies or from any other assets of the Agencies. The Participating County shall not enforce the liability and obligation of the Agencies to perform and observe the obligations contained in this Agreement,

or any other documents delivered in connection herewith in any action or proceeding wherein a money judgment in excess of the available proceeds of the foregoing sources shall be sought against the Agencies.

8.14 Benefits of this Agreement Limited to the Parties. Except for the Parties to this Agreement, nothing contained in this Agreement, expressed or implied, is intended to give to any person (including without limitation the owners of the Bonds) any right, remedy or claim under or by reason hereof. Any agreement or covenant required herein to be performed by or on behalf of any Party shall be for the sole and exclusive benefit of the other Parties to this Agreement.

[SIGNATURE PAGE TO IMMEDIATELY FOLLOW]

FORM OF DOCUMENT

IN WITNESS WHEREOF, each of the Parties hereto has executed this Agreement, either individually or by an authorized representative, on the day and year first set forth above.

STATE PUBLIC WORKS BOARD OF
THE STATE OF CALIFORNIA

By: _____
[Name]
Executive Director or Deputy Director

DEPARTMENT OF CORRECTIONS AND
REHABILITATION OF THE STATE OF
CALIFORNIA

By: _____
[Name]
[Title]
Facility Planning, Construction and Management

BOARD OF STATE AND COMMUNITY
CORRECTIONS OF THE STATE OF
CALIFORNIA

By: _____
[Name]
Executive Director or Authorized Designee

COUNTY OF _____

By: _____
[Name]
[Title]

EXHIBIT A

PROJECT SCOPE, COST AND SCHEDULE DESCRIPTION

_____ County
Jail Facility

PROJECT SCOPE

[Include narrative description of Project per Section 4.1]

FORM OF DOCUMENT

EXHIBIT A
Page 2

PROJECT COST

PROJECT SCHEDULE

FORM OF DOCUMENT

EXHIBIT B

FORM OF GROUND LEASE

FORM OF DOCUMENT

EXHIBIT C

FORM OF RIGHT OF ENTRY FOR CONSTRUCTION AND OPERATION

FORM OF DOCUMENT

EXHIBIT D

FORM OF FACILITY SUBLEASE

FORM OF DOCUMENT

EXHIBIT E-1

DESCRIPTION OF PARTICIPATING COUNTY FUNDING

Cash Contribution

CERTIFICATE OF THE COUNTY OF [ENTER COUNTY NAME] REGARDING ITS CASH (HARD) MATCH FOR THE [ENTER COUNTY NAME] COUNTY JAIL PROJECT

All capitalized terms not otherwise defined herein shall have the meaning given them in the Project Delivery and Construction Agreement.

WHEREAS, pursuant to Chapter 3.12 of Part 10b of Division 3 of Title 2 of the California Government Code (commencing at Section 15820.91) (the "Law"), the State Public Works Board (the "Board") is authorized to finance the acquisition, design and construction of a jail facility approved by the Board of State and Community Corrections (the "BSCC") pursuant to Section 15820.916 of the California Government Code (the "AB 900 Jail Financing Program"); and

WHEREAS, pursuant to California Code of Regulations Title 15, Division 1, Chapter 1, Subchapter 6, only the cost of certain design and construction activities are potentially eligible for reimbursement under the AB900 Jail Financing Program – acquisition, pre-design and other specified design and construction costs are not eligible; and

WHEREAS, the County of [ENTER COUNTY NAME] (the "Participating County") has proposed to build a jail facility, the [ENTER PROJECT NAME] project, (the "Project"), to be located at [ENTER PHYSICAL ADDRESS], real property controlled by the Participating County through fee-simple ownership (the "Site"); and

WHEREAS, pursuant to the Law, the Participating County is paying a portion of the costs of the Project (the "Cash (hard) Match") as described in Exhibit 1; and

WHEREAS, the Board intends to assist in the oversight and financing of the Project, subject to satisfaction of certain conditions and requirements of the Board, and the Board may in its sole, reasonable discretion, issue lease revenue bonds for the Project (the "Bonds"); and

WHEREAS, the interests of both the Board and the Participating County require confirmation of certain facts and certain assurances concerning the Cash (hard) Match.

NOW, THEREFORE, the Participating County, acting through its duly authorized representative, does hereby represent, warrant and covenant as follows:

(A) Lawfully Available Funds. The Cash (hard) Match, as described in Exhibit 1, has been derived exclusively from lawfully available funds of the Participating County.

(B) Cash (hard) Match Is Legal and Authorized. The payment of the Cash (hard) Match for the Project (i) is within the power, legal right, and authority of the Participating County; (ii) is

legal and will not conflict with or constitute on the part of the Participating County a material violation of, a material breach of, a material default under, or result in the creation or imposition of any lien, charge, restriction, or encumbrance upon any property of the Participating County under the provisions of any charter instrument, bylaw, indenture, mortgage, deed of trust, pledge, note, lease, loan, installment sale agreement, contract, or other material agreement or instrument to which the Participating County is a party or by which the Participating County or its properties or funds are otherwise subject or bound, decree, or demand of any court or governmental agency or body having jurisdiction over the Participating County or any of its activities, properties or funds; and (iii) have been duly authorized by all necessary and appropriate action on the part of the governing body of the Participating County. The authorized representative of the Participating County executing this Certificate is fully authorized and empowered to take such actions for and on behalf of the Participating County.

(C) Governmental Consents. The execution, delivery, and performance by the Participating County of this certificate and the use of the Cash (hard) Match for certain costs of the Project do not require the consent, approval, permission, order, license, or authorization of, or the filing, registration, or qualification with, any governmental authority other than the Participating County in connection with the execution, delivery, and performance of this Certificate, the consummation of any transaction herein contemplated, or the offer, issue, sale, or delivery of the Bonds, except as shall have been obtained or made and as are now in full force and effect.

(D) No Prior Pledge. The Cash (hard) Match and the Project are not and will not be mortgaged, pledged, or hypothecated by the Participating County in any manner or for any purpose and have not been and will not be the subject of a grant of a security interest by the Participating County. In addition, the Cash (hard) Match and the Project are not and will not be mortgaged, pledged, or hypothecated for the benefit of the Participating County or its creditors in any manner or for any purpose and have not been and will not be the subject of a grant of a security interest in favor of the Participating County or its creditors. The Participating County shall not in any manner impair, impede or challenge the security, rights and benefits of the owners of the Bonds or the trustee for the Bonds.

IN WITNESS WHEREOF, the undersigned duly authorized representative of the Participating County has executed and delivered this Certificate to the Board on the date set forth below.

Date: [ENTER DATE FROM PDCA COVER PAGE]

COUNTY OF [ENTER COUNTY NAME]

By: _____
[NAME]
[TITLE]

Exhibit 1-Description of Cash (hard) Match

[ENTER COUNTY NAME] County's Cash (hard) Match for the Project will be funded from [ENTER NUMBER OF SOURCES] sources: (1) _____, (2) _____, and (3) _____.

FORM OF DOCUMENT

**CERTIFICATE OF THE COUNTY OF [ENTER COUNTY NAME] REGARDING ITS
OTHER PARTICIPATING COUNTY FUNDING FOR THE [ENTER COUNTY NAME]
COUNTY JAIL PROJECT**

All capitalized terms not otherwise defined herein shall have the meaning given them in the Project Delivery and Construction Agreement.

WHEREAS, pursuant to Chapter 3.12 of Part 10b of Division 3 of Title 2 of the California Government Code (commencing at Section 15820.91) (the “Law”), the State Public Works Board (the “Board”) is authorized to finance the acquisition, design and construction of a jail facility approved by the Board of State and Community Corrections (the “BSCC”) pursuant to Section 15820.916 of the California Government Code (the “AB 900 Jail Financing Program”); and

WHEREAS, pursuant to California Code of Regulations Title 15, Division 1, Chapter 1, Subchapter 6, only the cost of certain design and construction activities are potentially eligible for reimbursement under the AB 900 Financing Program – acquisition, pre-design and other specified design and construction costs are not eligible; and

WHEREAS, the County of [ENTER COUNTY NAME] (the “Participating County”) has proposed to build a jail facility, the [ENTER PROJECT NAME] project, (the “Project”), to be located at [ENTER PHYSICAL ADDRESS], real property controlled by the Participating County through fee-simple ownership (the “Site”); and

WHEREAS, pursuant to the Law, the Participating County is contributing funding in addition to its Cash (hard) Match and In-Kind (soft) Match (the “Other Participating County Funding”); and

WHEREAS, the Board intends to assist in the oversight and financing of the Project, subject to satisfaction of certain conditions and requirements of the Board, and the Board may in its sole, reasonable discretion, issue lease revenue bonds for the Project (the “Bonds”); and

WHEREAS, the interests of both the Board and the Participating County require confirmation of certain facts and certain assurances concerning the Other Participating County Funding.

NOW, THEREFORE, the Participating County, acting through its duly authorized representative, does hereby represent, warrant and covenant as follows:

(A) Lawfully Available Funds. The Other Participating County Funding, as described in Exhibit 1, has been derived exclusively from lawfully available funds of the Participating County.

(B) Other Participating County Funding Is Legal and Authorized. The payment of the Other Participating County Funding for the Project (i) is within the power, legal right, and authority of the Participating County; (ii) is legal and will not conflict with or constitute on the part of the Participating County a material violation of, a material breach of, a material default under, or result in the creation or imposition of any lien, charge, restriction, or encumbrance upon any property of the Participating County under the provisions of any charter instrument, bylaw, indenture, mortgage, deed of trust, pledge, note, lease, loan, installment sale agreement, contract, or other material

agreement or instrument to which the Participating County is a party or by which the Participating County or its properties or funds are otherwise subject or bound, decree, or demand of any court or governmental agency or body having jurisdiction over the Participating County or any of its activities, properties or funds; and (iii) have been duly authorized by all necessary and appropriate action on the part of the governing body of the Participating County. The authorized representative of the Participating County executing this Certificate is fully authorized and empowered to take such actions for and on behalf of the Participating County.

(C) Governmental Consents. The execution, delivery, and performance by the Participating County of this certificate and the use of the Other Participating County Funding for certain costs of the Project do not require the consent, approval, permission, order, license, or authorization of, or the filing, registration, or qualification with, any governmental authority other than the Participating County in connection with the execution, delivery, and performance of this Certificate, the consummation of any transaction herein contemplated, or the offer, issue, sale, or delivery of the Bonds, except as shall have been obtained or made and as are now in full force and effect.

(D) No Prior Pledge. The Other Participating County Funding and the Project are not and will not be mortgaged, pledged, or hypothecated by the Participating County in any manner or for any purpose and have not been and will not be the subject of a grant of a security interest by the Participating County. In addition, the Other Participating County Funding and the Project are not and will not be mortgaged, pledged, or hypothecated for the benefit of the Participating County or its creditors in any manner or for any purpose and have not been and will not be the subject of a grant of a security interest in favor of the Participating County or its creditors. The Participating County shall not in any manner impair, impede or challenge the security, rights and benefits of the owners of the Bonds or the trustee for the Bonds.

IN WITNESS WHEREOF, the undersigned duly authorized representative of the Participating County has executed and delivered this Certificate to the Board on the date set forth below.

Date: [ENTER DATE FROM PDCA COVER PAGE]

COUNTY OF [ENTER COUNTY NAME]

By: _____
[NAME]
[TITLE]

Exhibit 1-Description of Other Participating County Funding

[ENTER COUNTY NAME] County's Other Participating County Funding for the Project will be funded from [ENTER NUMBER OF SOURCES] sources: (1) _____, (2) _____, and (3) _____.

FORM OF DOCUMENT

EXHIBIT E-2

DESCRIPTION OF PARTICIPATING COUNTY FUNDING

In-kind (soft) Match

[DESCRIPTION TO BE INSERTED]

FORM OF DOCUMENT

EXECUTION COPY

EXHIBIT B

FORM OF GROUND LEASE

RECORDING REQUESTED BY AND)
WHEN RECORDED MAIL TO:)
)
 _____)
 _____)
 _____)
Attention:)

[Space above for Recorder's use]

GROUND LEASE

by and between the

[PARTICIPATING COUNTY]
 as Landlord,

and

DEPARTMENT OF CORRECTIONS AND REHABILITATION
 OF THE STATE OF CALIFORNIA,
 as Tenant

Dated as of _____, 20__

(FOR A JAIL FACILITY
 LOCATED IN THE COUNTY OF _____)

NO DOCUMENTARY TRANSFER TAX DUE. This Ground Lease is recorded for the benefit of the State of California and is exempt from California transfer tax pursuant to Section 11928 of the California Revenue and Taxation code

and from recording fees pursuant to Sections 6103 and 27383
of the California Government Code

FORM OF DOCUMENT

TABLE OF CONTENTS

	Page
SECTION 1. Definitions.....	2
SECTION 2. Effective Date	4
SECTION 3. Representations, Warranties and Covenants.....	4
SECTION 4. Lease of the Site, Access, Utilities and Repairs Easements and Recordation of Lease	7
SECTION 5. Landlord Right of Entry for Construction and Operation.....	8
SECTION 6. Purpose and Use.....	8
SECTION 7. Assignment or Sublease.....	8
SECTION 8. No Commitment to Issue the Bonds and Non-Liability of the Department and the State.....	9
SECTION 9. Cooperation.....	9
SECTION 10. Term and Extension	9
SECTION 11. Rental	9
SECTION 12. Taxes and Assessment	9
SECTION 13. Right of First Offer and Priority of Ground Lease	10
SECTION 14. Damage or Destruction	10
SECTION 15. Insurance	10
SECTION 16. Condition and Title to the Improvements on Termination	10
SECTION 17. The Department’s Right to Terminate	11
SECTION 18. The Participating County’s Right to Terminate.....	11
SECTION 19. Non-Termination, Default and Damages.....	11
SECTION 20. Waste and Hazardous Materials.....	11
SECTION 21. Eminent Domain	11
SECTION 22. Non-Discrimination	12
SECTION 23. Liens.....	12
SECTION 24. Indemnification	13
SECTION 25. Non-Encumbrance	13
SECTION 26. Miscellaneous	13

TABLE OF CONTENTS
(continued)

	Page
Exhibit A	Project Description..... A-1
Exhibit B	Legal Description of the SiteB-1
Exhibit C	Form of Easement Agreement for Grant of Access, Utilities and Repairs.....C-1
Exhibit D	Form of Legal Opinion Letter..... D-1
Exhibit E	List of the Permitted EncumbrancesE-1
Exhibit F	Pending and Threatened Lawsuits F-1

FORM OF DOCUMENT

GROUND LEASE

THIS GROUND LEASE, dated as of _____, 20__ for reference only (this “Ground Lease”), is entered into by and between COUNTY OF _____ (the “Participating County”), a Political Subdivision of the State of California (the “State”), as Landlord, and the DEPARTMENT OF CORRECTIONS AND REHABILITATION OF THE STATE OF CALIFORNIA (the “Department”), an entity of state government of the State, as Tenant. The Participating County and the Department are sometimes referred to collectively as the “Parties”, and individually as a “Party”.

RECITALS

WHEREAS, pursuant to Chapter 3.12 of Part 10b of Division 3 of Title 2 of the California Government Code (commencing at Section 15820.91), the State Public Works Board (the “Board”) is authorized to finance the acquisition, design and construction of a jail facility approved by the Board of State and Community Corrections (the “BSCC”) pursuant to Section 15820.916 and following, as amended, (the “AB 900 Jail Financing Program”), the Participating County, the Department, BSCC and the Board entered into the Project Delivery and Construction Agreement (the “PDCA”) dated as of _____, 20__, for reference only; and

WHEREAS, further to the PDCA, the Participating County has proposed to build a jail facility as more particularly described in Exhibit A attached hereto (the “Project”), to be located on real property owned in fee simple by the Participating County and legally described in Exhibit B attached hereto (the “Site”); and

WHEREAS, further to the PDCA, the Department desires to ground lease the Site from the Participating County to assist the Participating County in obtaining eligibility for the Board lease revenue bond financing to finance a portion of the construction of the Project (the “Bonds”); and

WHEREAS, the Department and the Board desire that the term of this Ground Lease not terminate or expire until the Bonds have been paid in full or retired under the provisions of the Bond Documents; and

WHEREAS, the Participating County is desirous of maintaining its eligibility to receive financing for the Project, and to achieve this end, the Participating County is willing to lease the Site to the Department; and

WHEREAS, concurrently with the execution of this Ground Lease, the Department as the Licensor and the Participating County as the Licensee, have entered into a Right of Entry for Construction and Operation (the “Right of Entry”) in substantially the form attached as Exhibit C to the PDCA, authorizing the Participating County to enter the Site for the purpose of constructing the Project and for operation of the Project upon substantial completion of construction; and

WHEREAS, if the Participating County maintains its eligibility in the AB 900 Jail Financing Program, and the Board in its sole discretion, is able to issue the Bonds to finance the Project in its typical and customary manner, the Department will concurrently sublease the Site

to the Board, (the “Site Lease”), and enter into a Facility Lease (the “Facility Lease”) providing for the Board to sublease to the Department the Site and the Project (together the “Facility”). The Site Lease and the Facility Lease will provide security for the Bonds to be issued by the Board under an indenture (the “Indenture”) between the Board and the Treasurer of the State, as trustee (the “State Treasurer”); and

WHEREAS, if the Board is able to issue the Bonds for the Project in its typical and customary manner, concurrently with executing the Site Lease and the Facility Lease, the Department and the Participating County intend to enter into a Facility Sublease (the “Facility Sublease”) whereby the Department will sublet the Facility to the Participating County pursuant to the terms of the Facility Sublease; and

NOW, THEREFORE, in consideration of the mutual obligations of the Parties hereto, the Participating County hereby leases to the Department, and the Department hereby leases from the Participating County, the Site subject to the terms, covenants, agreements and conditions hereinafter set forth, to each and all of which the Participating County and the Department hereby mutually agree.

SECTION 1. Definitions.

As used herein, the following terms shall have the following meanings:

- (a) “AB 900 Jail Financing Program” has the meaning given to such term in the Recitals.
- (b) “Abatement Event” shall have the meaning given to such term in the Facility Lease.
- (c) “Board” means the State Public Works Board of the State of California, an entity of state government of the State.
- (d) “Bond Documents” mean each and every document evidencing the Bonds, including, but not limited to, the Site Lease, the Facility Lease, the Facility Sublease, and the Indenture.
- (e) “Bonds” has the meaning given to such term in the Recitals.
- (f) “BSCC” has the meaning given to such term in the Recitals.
- (g) “Claims” has the meaning given to such term in Section 23 of this Ground Lease.
- (h) “Department” has the meaning given to such term in the preamble.
- (i) “DGS” means the Department of General Services of the State of California, an entity of state government of the State.
- (j) “Easements” mean the access, utilities and repairs easements described in Subsection 4(b) of this Ground Lease.

(k) “Easement Agreement” means an easement agreement memorializing the grant of Easements by the Participating County, as grantor, to the Department, as grantee, in the form of Exhibit C attached hereto.

(l) “Easement Property” means real property owned by the Participating County that is burdened by the Easement Agreement as described in Exhibit 2 to the Easement Agreement.

(m) “Effective Date” means the date this Ground Lease is valid, binding and effective as provided in Section 2 of this Ground Lease.

(n) “Facility” has the meaning given to such term in the Recitals.

(o) “Facility Lease” has the meaning given to such term in the Recitals.

(p) “Facility Sublease” has the meaning given to such term in the Recitals.

(q) “Ground Lease” has the meaning given to such term in the preamble, including all exhibits attached hereto.

(r) “Hazardous Materials” mean any substance, material, or waste which is or becomes, regulated by any local governmental authority, the State, or the United States Government, including, but not limited to, any material or substance which is (i) defined as a “hazardous waste”, “extremely hazardous waste”, or “restricted hazardous waste” under Section 25115, 25117 or 25122.7 of the California Health and Safety Code, or listed pursuant to Section 25140 of the California Health and Safety Code, Division 20, Chapter 6.5 (Hazardous Waste Control Law), (ii) defined as “hazardous substance” under Section 25316 of the California Health and Safety Code, Division 20, Chapter 6.8 (Carpenter-Presley-Talmer Hazardous Substance Account Act), (iii) defined as a “hazardous material”, “hazardous substance”, or “hazardous waste” under Section 25501 of the California Health and Safety Code.

(s) “Improvements” mean the physical construction of the Project and other buildings, improvements, structures, furnishings and equipment placed in, under or upon the Site by the Participating County under the terms and conditions in the Right of Entry or this Ground Lease.

(t) “Indemnitees” has the meaning given to such term in Section 24 of this Ground Lease.

(u) “Indenture” has the meaning given to such term in the Recitals.

(v) “Landlord” has the meaning given to such term in the preamble.

(w) “Leasehold Estate” means the real property right and interest held by the Department as Tenant to possess, use and access the Site and the Project under the terms and conditions of this Ground Lease.

(x) “Participating County” has the meaning given to such term in the preamble.

- (y) “Parties” has the meaning given to such term in the preamble.
- (z) “Party” has the meaning given to such term in the preamble.
- (aa) “PDCA” has the meaning given to such term in the Recitals.
- (bb) “Permitted Encumbrances” has the meaning given to such term in Subsection 3(b)(4) of this Ground Lease.
- (cc) “Project” means the buildings, structures, works and related improvements constructed or to be constructed on the Site, as are more particularly described in Exhibit A attached hereto, and any and all additions, betterments, extensions and improvements thereto.
- (dd) “Resolution” has the meaning given to such term in Subsection 3(b)(1) of this Ground Lease.
- (ee) “Right of Entry” has the meaning given to such term in the Recitals.
- (ff) “Right of First Offer” has the meaning given to such term in Section 13 of this Ground Lease.
- (gg) “Site” has the meaning given to such term in the Recitals.
- (hh) “Site Lease” has the meaning given to such term in the Recitals.
- (ii) “State” means the state government of the State of California.
- (jj) “State Treasurer” has the meaning given to such term in the Recitals.
- (kk) “Tenant” has the meaning given to such term in the preamble.
- (ll) “Term” has the meaning given to such term in Section 10 of this Ground Lease.

SECTION 2. Effective Date.

The Parties hereby confirm and agree that this Ground Lease is effective and binding on the Parties upon the first day (the “Effective Date”) on which this Ground Lease has been consented to by the Board and a duly authorized representative of the Board has consented to this Ground Lease by executing it below.

SECTION 3. Representations, Warranties and Covenants.

(a) Representations and Warranties of the Department. In addition to any express agreements of Tenant herein, the Department makes the following representations and warranties to the Participating County as of the Effective Date:

(1) The Department has full legal right, power and authority to enter into this Ground Lease as Tenant and to carry out and consummate all transactions contemplated by this Ground Lease and by proper action has duly authorized the execution and delivery of this

Ground Lease. The Department shall cause an opinion, dated as of [the date in the preamble of this Ground Lease] and in substantially the form of Exhibit D attached to this Ground Lease, to be delivered to the Board contemporaneously with the Department's execution of this Ground Lease;

(2) The officers of the Department executing this Ground Lease are duly and properly holding their respective offices and are fully authorized to execute this Ground Lease; and

(3) This Ground Lease has been duly authorized, executed and delivered by the Department, and will constitute a legal, valid and binding agreement of the Department, enforceable against the Department in accordance with its terms on the Effective Date.

(b) Representations, Warranties and Covenants of the Participating County. In addition to any express agreements of Landlord herein, the Participating County makes the following representations, warranties and covenants to the Department as of the Effective Date:

(1) The Participating County, by Resolution of the Board of Supervisors ("Resolution"), has full legal right, power and authority to enter into this Ground Lease as Landlord, to transfer and convey the Leasehold Estate to the Department under this Ground Lease, and to carry out and consummate all transactions contemplated by this Ground Lease and by proper action has duly authorized the execution and delivery of this Ground Lease. The Participating County shall cause an opinion, dated as of [the date in the preamble of this Ground Lease] and in substantially the form of Exhibit D attached to this Ground Lease, to be delivered to the Board contemporaneously with the Participating County's execution of this Ground Lease.

(2) The officers of Participating County executing this Ground Lease are duly and properly holding their respective offices and have the legal power, right and are fully authorized to execute this Ground Lease pursuant to the Resolution.

(3) This Ground Lease has been duly authorized, executed and delivered by Participating County, and will constitute a legal, valid and binding agreement of Participating County, enforceable against the Participating County in accordance with its terms upon the Effective Date.

(4) The Participating County is the owner in fee simple of the Site and has marketable and insurable fee simple title to the Site, there is no suit, action, arbitration, legal, administrative, or other proceeding or inquiry pending against the Site or pending against the Participating County which could affect the Participating County's title to the Site, affect the value of the Site, or subject an owner of the Site to liability and there are no outstanding mortgages, deeds of trust, bond indebtedness, leaseholds, pledges, conditions or restrictions, liens or encumbrances against the Site except as identified in Exhibit E, attached hereto, collectively, the "Permitted Encumbrances".

(5) No consent, permission, authorization, order, license, or registration with any governmental authority is necessary in connection with the execution and delivery of this Ground Lease, except as have been obtained.

(6) There exists no litigation or other proceeding pending or threatened against the Participating County except as identified in Exhibit F, attached hereto, that, if determined adversely, would materially and adversely affect the ability of the Participating County to perform its obligations under this Ground Lease.

(7) This Ground Lease is, and all other instruments, documents, exhibits, and agreements required to be executed and delivered by the Participating County in connection with this Ground Lease are and shall be, duly authorized, executed and delivered by the Participating County and shall be valid, legally binding obligations of and enforceable against the Participating County in accordance with their terms.

(8) Neither the execution and delivery of this Ground Lease and documents referenced herein, nor the incurrence of the obligations set forth herein, nor the consummation of the transactions herein contemplated, nor compliance with the terms of this Ground Lease and the documents referenced herein conflict with or result in the material breach of any terms, conditions or provisions of, or constitute a default under, any agreements or instruments to which the Participating County is a party or affecting the Site.

(9) There are no attachments, execution proceedings, or assignments for the benefit of creditors, insolvency, bankruptcy, reorganization or other proceedings pending against the Participating County.

(10) There are no and have been no:

(A) actual or pending public improvements which will result in the creation of any liens, encumbrances or assessments upon the Site, including public assessments or mechanics liens, other than the Permitted Encumbrances, and the Participating County agrees to indemnify, defend and hold the Department free and harmless from and against any claims, liabilities, losses, costs, damages, expenses and attorneys' fees arising from any liens, encumbrances or assessments that have been, or may be, imposed upon the Site as a consequence of actual or impending public improvements at or after the Effective Date, including any obligations to pay a fee or assessment for infrastructure to the extent such liability survives or continues at or after the Effective Date, and the Department agrees to cooperate with the Participating County, at the Participating County's costs and to the extent permitted by law, with respect to the Participating County's efforts to remove any such liens, fees, assessments, or encumbrances.

(B) uncured notices from any governmental agency notifying the Participating County of any violations of law, ordinance, rule, or regulation, including Environmental Laws, occurring on the Site.

(C) notices of any condemnation, zoning or other land-use regulation proceedings, either instituted or planned to be instituted, which would detrimentally affect the use, operation or value of the Site.

(11) The Participating County hereby agrees that it will not enter into any new leases or any other obligations or agreements that will affect the Site at or after the Effective Date, without the express prior written consent of the Department and approval of the Board.

(12) The Participating County will not subject the Site to any additional liens, encumbrances, covenants, conditions, easements, rights of way or similar matters after the Effective Date without the express prior written consent of the Department and the approval of the Board.

(13) The Participating County shall promptly notify the Department of any event or circumstance that makes any representation or warranty of the Participating County under this Ground Lease untrue or misleading, or of any covenant of the Participating County under this Ground Lease incapable or less likely of being performed. The Participating County's obligation to provide the notice described in the preceding sentence to the Department shall in no way relieve the Participating County of any liability for a breach by the Participating County of any of its representations, warranties or covenants under this Ground Lease.

(14) The Department shall at all times during the Term have access to and from the Site.

(15) No representation, warranty or statement of the Participating County in this Ground Lease or in any document, certificate, exhibit or schedule furnished or to be furnished to the Department pursuant hereto contains or will contain any untrue statement of a material fact or omits or will omit to state a material fact necessary to make the statements or facts contained therein not misleading.

SECTION 4. Lease of the Site, Access, Utilities and Repairs Easements and Recordation of Lease.

(a) **Lease of the Site and Recordation of Ground Lease.** The Participating County hereby leases the Site to the Department and the Department leases the Site from the Participating County. The Participating County further agrees to provide, or cause to be provided, to the Department and its assigns or sublessees, adequate parking spaces at no cost, and such utility services as the Participating County customarily provides or causes to be provided to facilities similar to the Project, including without limitation electricity, gas, water, sewer, garbage disposal, heating, air conditioning and telephone. The Department and the Board shall have the right to record this Ground Lease in the Official Records of the Participating County as of the Effective Date or anytime thereafter.

[Use Note: Section 4(b) and the Easement Agreement are necessary if Site access and utilities are provided by other real property. The execution form of the Easement Agreement is attached as Exhibit C.]

(b) **Access, Utilities and Repairs Easement.** As of the Effective Date, the Participating County agrees to grant to the Department, for the use, benefit and enjoyment of the Department and its lessees, successors and assigns, and their respective employees, invitees, agents, independent contractors, patrons, customers, guests and members of the public using or visiting the Site or the Project, a non-exclusive easement over, across and under the Easement Property for the purpose of: a) ingress, egress, passage or access to and from the Site by pedestrian or vehicular traffic; b) installation, maintenance and replacement of utility wires, cables, conduits and pipes; and c) other purposes and uses necessary or desirable for access to and from the Site for the repair, operation and maintenance of the Facility (collectively the "Easements"). The grant of the Easements shall be

memorialized in that certain Easement Agreement for Grants of Access, Utilities and Repairs (the "Easement Agreement") in substantially the form of Exhibit C attached to this Ground Lease. The Department and the Board shall have the right to record the Easement Agreement in the Official Records of the Participating County as of the Effective Date or anytime thereafter. The Easements to be granted by the Participating County are subject to the limitations set forth in the Easement Agreement. In the event of a conflict or ambiguity, with respect to the terms of the Easements, between this Ground Lease and the Easement Agreement, the terms of the Easement Agreement shall control.

SECTION 5. Landlord Right of Entry for Construction and Operation.

(a) Landlord Right of Entry for Construction and Operation. Notwithstanding anything to the contrary contained herein, Landlord has reserved the right to enter and use the Site for construction of the Project pursuant to the terms and conditions in the Right of Entry.

(b) Quiet Enjoyment. The Participating County covenants that the Department, its assigns or sublessees, may quietly have, hold, and enjoy all of the Site and the Improvements during the Term of this Ground Lease and any extended term hereof, without hindrance or interruption by the Participating County or by any other person or persons lawfully or equitably claiming by, through or under the Participating County, except as limited by the Permitted Encumbrances.

SECTION 6. Purpose and Use.

The Parties reasonably expect for the Site to be used by the Department, and each of its assignees or sublessees during the Term of this Ground Lease, for the purpose of causing the construction, operation and maintenance of the Project and appurtenances thereto; provided however, the Parties acknowledge that the Site may be utilized for other types of correctional housing or other public purposes as may be required to exercise the Board's obligations, rights and remedies under the Bond Documents.

The Participating County acknowledges and confirms that the Department's use of the Leasehold Estate created hereunder includes, but is not limited to, allowing for potential financing and construction of the Project and the leasing of the Site and/or the Facility pursuant to the Site Lease, the Facility Lease, and the Facility Sublease and for such other purposes as may be incidental thereto. The Participating County further acknowledges and confirms the Board's right to relet the Facility in the event of a default under the Facility Lease and to provide for all other rights and remedies of the Board, the State Treasurer, and the owners of the Bonds in the event of a default under the Bond Documents.

SECTION 7. Assignment or Sublease.

The Department may sublet or assign all or a portion of the Site or the Project or assign this Ground Lease or any interest therein, without the prior consent or approval of the Participating County; provided, however, any sublet or assignment shall be subject to the prior approval of the Board and Participating County is provided notice of said sublet or assignment. Notwithstanding that the Participating County's consent or approval is not required for any subletting of the Site or the Project, to assist with the Board's financing of the Project, the

Participating County hereby consents to and approves the sublease of the Site, together with the Improvements, to the Board under the Site Lease and the further subletting of the Facility by the Board to the Department under the Facility Lease.

SECTION 8. No Commitment to Issue the Bonds and Non-Liability of the Department and the State.

The delivery of this Ground Lease shall not directly, indirectly or contingently, obligate the Department, the Board or any other subdivision of the State to issue the Bonds or levy any form of taxation or to make any appropriation with respect to the Project. Any obligation of the Department created by or arising out of this Ground Lease shall not impose a debt or pecuniary liability upon the Department, the Board or any other subdivision of the State, or a charge upon the general credit or taxing powers thereof but shall be payable solely out of funds duly authorized and appropriated by the State.

SECTION 9. Cooperation.

The Participating County has a duty to fully cooperate and provide all necessary assistance to the Department and the Board to aid them in their efforts to finance the Project. The Participating County acknowledges that it is authorized and directed to provide cooperation concerning the issuance of the Bonds, including without limitation, executing and delivering such certificates, legal opinions or instruments as the Department or the Board may reasonably request. The Participating County's legal counsel, Chief Administrative Officer and its Sheriff are authorized and directed to cooperate in the issuance of the Bonds and to execute all documents reasonably needed to accomplish such financing.

SECTION 10. Term and Extension.

The Term of this Ground Lease shall commence on the Effective Date and shall co-terminate on the same date as the Facility Lease, unless such Term is extended by the parties thereto, or unless sooner terminated as provided herein, except no termination of this Ground Lease shall occur until all the Bonds and all other indebtedness incurred by the Board for the Project, if any, have been fully repaid.

SECTION 11. Rental.

The Department shall pay the Participating County rental in the sum of Ten Dollars (\$10.00) per year, all of which rental shall be deemed to have been prepaid to the Participating County by the Department on the Effective Date and, thereby acknowledges the Participating County's match funding requirement has been sufficiently met. The Participating County agrees that the payment of such rental is adequate consideration for the leasing of the Site, together with the Improvements, under this Ground Lease.

SECTION 12. Taxes and Assessment.

The Department shall pay or cause to be paid all lawful taxes that may be levied at any time upon any interest the Department may have under this Ground Lease (including both the Site and the Improvements after the Effective Date). The Participating County and the

Department each represent and acknowledge that neither Party believes or expects that its respective interests in the Site are subject to payment of property taxes. The Department shall have the right to contest the validity of any levy or tax assessment levied upon the Department's interest in the Site.

SECTION 13. Right of First Offer and Priority of Ground Lease.

(a) **Right of First Offer.** Should the Participating County decide to sell the Site at any time during the Term of this Ground Lease, the Participating County shall notify the Department and the Board in writing of such intention prior to soliciting offers from any prospective purchasers. In such event, the Department and the Board shall have fifteen (15) months from receipt of such notification of intention to sell to inform the Participating County of the Department's interest in acquiring the Site. The Participating County understands that the State's acquisition process requires an appropriation of funds and the approval of the Board. The Participating County agrees to reasonably cooperate with the Department in obtaining such approval and in meeting any other State property acquisition requirements that may exist at that time. If the Department informs the Participating County of the Department's intention to acquire the Site within said fifteen (15) month period, the Parties agree to negotiate a purchase agreement in good faith and at a price that is the fair market value of the Site at the time the Department exercises its Right of First Offer.

(b) **Priority of Ground Lease.** If the Department and the Participating County are unable to agree on the terms and conditions for the purchase and sale of the Site, or if the Board does not approve the acquisition of the Site by the Department, the Participating County shall be free to market and sell the Site to a third party; provided, however, any new owner of the Site shall acquire the Site subject to this Ground Lease and any encumbrances related to the Bonds and the Bond Documents. The Department and the Board shall have no obligation to subordinate the Ground Lease, the Bonds or the Bond Documents to accommodate the new owner or lender(s).

SECTION 14. Damage or Destruction.

Damage or destruction to the Project shall not act to terminate or cancel this Ground Lease. In the event of any damage or destruction of the Project, the use of the proceeds of any property casualty or builder's risk insurance required to be procured and maintained pursuant to the PDCA, or any insurance required by the Facility Lease or Facility Sublease shall be governed by the terms of the agreement that required the procurement of such insurance.

SECTION 15. Insurance.

Except for insurance obligations that may arise as a result of the issuance of the Bonds by the Board, or as may be required by the PDCA, the Department shall have no obligation to purchase insurance for the Site or the Project, including but not limited to any general liability, earthquake, flood, fire or extended casualty coverage.

SECTION 16. Condition and Title to the Improvements on Termination.

Upon termination or expiration of this Ground Lease, the Department shall have no

obligation, to remove the Improvements. Title to the Improvements, including the Project, during the Term shall be vested in the State. Subject to the terms and conditions in the Bond Documents, at the termination or expiration of this Ground Lease, fee title to the Improvements, including the Project, shall vest in the Participating County and become the property of the Participating County without further action of any Party and without the necessity of a deed from the Department to the Participating County.

SECTION 17. The Department's Right to Terminate.

The Department, with the approval of the Board, shall have the right to terminate this Ground Lease upon thirty (30) days written notice to the Participating County without any liability; provided, however, no termination of this Ground Lease or reversion of title to any portion of the Site or vesting of title to the Project may occur until the Bonds have been fully paid or retired under the provisions of the Bond Documents.

SECTION 18. The Participating County's Right to Terminate

Participating County's proper exercise of its termination rights pursuant to Article 2, section 2.2(b) of the PDCA serves to terminate this Ground Lease effective on the date of termination of the PDCA.

SECTION 19. Non-Termination, Default and Damages.

This Ground Lease shall expire at the end of the Term. It is expressly agreed by the Parties to this Ground Lease that any default under this Ground Lease will not allow either Party to terminate or otherwise interfere with the Department's quiet enjoyment and beneficial use of the Site and the Project under this Ground Lease, the Site Lease or the Facility Lease. Until such time as the Bonds have been fully paid or retired under the provisions of the Bond Documents, the sole remedy of any Party upon such default shall be a suit for money damages or specific performance to remedy such a default.

SECTION 20. Waste and Hazardous Materials.

Neither the Participating County nor the Department shall knowingly commit, suffer or permit any waste or nuisance on the Site or any acts to be done thereon in violation of any laws or ordinances. To the Participating County's best knowledge, after having examined its documents, public records and other instruments and having made inquiry of appropriate departments and agencies with respect to the Site and, except as specifically provided in this Ground Lease, no Hazardous Materials, were used, generated, stored, released, discharged or disposed of on, under, in, or about the Site or transported to or from the Site. The Participating County represents with respect to the Site that neither the Participating County nor any other person or entity under the control of, or with the knowledge of the Participating County will cause or permit the use generation, storage, release, discharge, or disposal of any Hazardous Materials on, under, in, or about the Site or transported to or from the Site.

SECTION 21. Eminent Domain.

If the whole or any portion of the Site or the Project shall be taken in eminent domain

proceedings, or by sale in lieu of such taking by a governmental entity threatening to use the power of eminent domain, and which taking in the collective judgment of the Department, the Board, and the State Treasurer renders the Site and/or the Project unsuitable for the continued use by the State, then this Ground Lease shall terminate when possession is taken by the condemning entity.

If this Ground Lease is terminated because of such taking and any of the Bonds are outstanding, then all proceeds from any permanent or temporary taking shall be used to repay any outstanding Bonds as provided in the Bond Documents, including any outstanding or accrued interest, and upon full repayment of the Bonds then the remaining proceeds, if any, shall be distributed to the Department and the Participating County according to their respective interests as provided in the Bond Documents. The Participating County and the Department shall each have the right to represent its own interest, at its own cost and expense, in any proceedings arising out of such taking, and each of the Participating County and the Department shall reasonably cooperate with the other, including without limitation, settling with the condemning authority only with the other Party's consent if such settlement would affect the other Party's rights.

If this Ground Lease is not terminated because of such taking, then it shall remain in full force and effect with respect to the remainder of the Site and the Project. The Participating County and the Department each waives the provisions of the California Code of Civil Procedure, Section 1265.130, or any similar law that permits a Party to petition a court to terminate this Ground Lease upon a taking affecting the Site or the Project, the Parties agreeing that any such termination rights shall be only as expressly set forth in this Ground Lease.

SECTION 22. Non-Discrimination.

During the performance of this Ground Lease, the Participating County shall not deny benefits to any person on the basis of religion, color, ethnic group identification, sex, age, physical or mental disability, nor shall they discriminate unlawfully against any employee or applicant for employment because of race, religion, color, national origin, ancestry, physical handicap, mental disability, medical condition, marital status, age, or sex. The Participating County shall ensure that the evaluation and treatment of employees and applicants for employment are free of such discrimination.

The Participating County shall comply with the provisions of the Fair Employment and Housing Act (Government Code, Section 12900 et seq.), the regulations promulgated thereunder (California Code of Regulations, Title 2, Section 7285.0 et seq.), the provisions of Article 9.5, Chapter I, Part I, Division 3, Title 2 of the Government Code (Government Code, Sections 11135- 11139.5), and the regulations or standards adopted to implement such article.

SECTION 23. Liens.

In the event the Department, the Board or their designees, at any time during the Term, causes any changes, alterations, additions, improvements, or other work to be done or performed or materials to be supplied, in or upon the Project or the Site, the Department, the Board or their designees shall pay, when due, all sums of money that may become due for any labor, services,

materials, supplies or equipment furnished to or for the Department or the Board, upon or about the Project or the Site and which may be secured by any lien against the Project or the Site or the Department's or the Board's interest therein, and will cause each such lien to be fully discharged and released at the time the performance of any obligation secured by any such lien matures or comes due; except that, if the Department or the Board desires to contest any such lien, it may do so. If any such lien is reduced to final judgment and such judgment or other process as may be issued for the enforcement thereof is not promptly stayed, or if so stayed, said stay thereafter expires, the Department or the Board shall forthwith pay and discharge said judgment.

SECTION 24. Indemnification.

As required by Section 15820.915 of the California Government Code, the Participating County hereby agrees that it shall indemnify, protect, defend and hold harmless the State, including but not limited to, the Department, the Board, DGS, and each of their respective officers, governing members, directors, officials, employees, subcontractors, consultants and agents (collectively the "Indemnitees"), for any and all claims, liabilities and losses arising out of the use of the Site or the Project, including, but not limited to all demands, causes of action and liabilities of every kind and nature whatsoever arising out of, related to, or in connection with (a) any breach of this Ground Lease by the Participating County; (b) the construction, operation, maintenance, use and occupancy of the Project; (c) any acts or omissions of any contractor hired by the Participating County or its agents or subcontractor hired by such contractor (collectively the "Claims"). The Participating County's obligation to indemnify, defend, and save harmless the Indemnitees shall extend to all Claims arising, occurring, alleged, or made any time, including prior to, during, or after this Ground Lease is in full force and effect. The Participating County's obligation to indemnify, defend, and save harmless the Indemnitees shall apply regardless of any active and/or passive negligent act or omission of the Indemnitees, but the Participating County shall not be obligated to provide indemnity or defense for Indemnitees wherein the Claims arise out of the gross negligence or willful misconduct of the Indemnitees. The indemnification obligation of the Participating County set forth in this Section shall survive the expiration of the Term or earlier termination of this Ground Lease.

SECTION 25. Non-Encumbrance.

The Participating County covenants that the Facility is not and will not be mortgaged, pledged, or hypothecated in any manner or for any purpose and has not been and will not be the subject of a grant of a security interest by the Participating County without the written consent of the Department and the Board. The Participating County further covenants that it shall not in any manner impair, impede or challenge the security, rights and benefits of the owners of the Bonds or the trustee for the Bonds.

SECTION 26. Miscellaneous.

(a) Amendments. This Ground Lease may only be amended, changed, modified or altered in writing by the Parties. As long as any of the Bonds are outstanding the Board must consent to any amendment hereto to be effective.

(b) Waiver. The waiver by any Party of a breach by the other Party of any term,

covenant or condition hereof shall not operate as a waiver of any subsequent breach of the same or any other term, covenant or condition hereof.

(c) Law Governing. This Ground Lease shall be governed exclusively by the provisions hereof and by the laws of the State and any action arising from or relating to this Ground Lease shall be filed and maintained in Sacramento County Superior Court, Sacramento, California.

(d) Section Headings. All articles, paragraph and section headings, titles or captions contained in this Ground Lease are for convenience of reference only and are not intended to define or limit the scope of any provision of this Ground Lease.

(e) Conflicts Between Terms of Documents. Nothing in this Ground Lease is intended to amend, modify or supersede the PDCA except as expressly provided herein. In the event of any inconsistency in the PDCA and this Ground Lease, the inconsistency shall be resolved by giving preference to the PDCA. In the event of any inconsistency between this Ground Lease and the Bond Documents, the inconsistencies shall be resolved by giving preference to the Bond Documents.

(f) Relationship of Parties. The Department and its agents and employees involved in the performance of this Ground Lease shall act in an independent capacity and not as officers, employees or agents of the Participating County.

(g) Successors and Assigns. The terms and provisions hereof shall extend to and be binding upon and inure to the benefit of the successors and assigns of the respective Parties.

(h) Partial Invalidity. If any one or more of the terms, provisions, covenants or conditions of this Ground Lease shall to any extent be declared invalid, unenforceable, void or voidable for any reason by a court of competent jurisdiction and the finding or order or decree of which becomes final, none of the remaining terms, provisions, covenants or conditions of this Ground Lease shall be affected thereby, and each provision of this Ground Lease shall be valid and enforceable to the fullest extent permitted by law.

(i) Notices. All notices herein which are to be given or which may be given by either Party to the other, shall be in writing and shall be deemed to have been given three (3) business days after deposit in the United States Mail, certified and postage prepaid, return receipt requested and addressed as follows:

To the Department: California Department of Corrections and Rehabilitation
9838 Old Placerville Road, Suite B
Sacramento, CA 95827
Attention: Deputy Director, Facility Planning, Construction
and Management
Facsimile: 916-322-5717

To the Board: State Public Works Board
915 L Street, 9th Floor
Sacramento, CA 95814

Attention: Executive Director
Facsimile: 916-449-5739

To the Participating County: County of _____
[Street Address]
[City, State and Zip Code]
Attention: _____
Facsimile: _____

Nothing herein contained shall preclude the giving of any such written notice by personal service, in which event notice shall be deemed given when actually received. The address to which notices shall be mailed to a Party may be changed by written notice given to all Parties as hereinabove provided.

(j) Execution and Counterparts. This Ground Lease may be executed in any number of counterparts, each of which shall be deemed to be an original, but all of which together shall constitute one and the same Ground Lease. It is also agreed that separate counterparts of this Ground Lease may separately be executed by the signatories to this Ground Lease, all with the same force and effect as though the same counterpart had been executed by all of the signatories.

(k) Bankruptcy. In the event of any bankruptcy proceeding, this Ground Lease will not be treated as an executory contract and cannot be rejected by the Participating County.

(l) Exhibits. The following Exhibits are attached to this Ground Lease and incorporated by reference herein.

- Exhibit A: Project Description
- Exhibit B: Legal Description of the Site
- Exhibit C: Form of Easement Agreement for Grants of Access, Utilities and Repairs
- Exhibit D: Form of Legal Opinion Letter
- Exhibit E: List of the Permitted Encumbrances
- Exhibit F: Pending and Threatened Lawsuits

[SIGNATURE PAGE TO IMMEDIATELY FOLLOW]

IN WITNESS WHEREOF, the Parties hereto have caused this Ground Lease to be executed by their respective officers thereunto duly authorized, all as of the day and year first written above.

[PARTICIPATING COUNTY]

By: _____
Name: _____
Title: _____

**DEPARTMENT OF CORRECTIONS
AND REHABILITATION OF THE
STATE OF CALIFORNIA**

By: _____
Name: Deborah Hysen
Title: Deputy Director
Facility Planning, Construction
and Management

**CONSENT: STATE PUBLIC WORKS
BOARD OF THE STATE OF CALIFORNIA**

By: _____
Name: Stephen Benson
Title: Deputy Director

Date: _____

**APPROVED: DEPARTMENT OF GENERAL
SERVICES OF THE STATE OF
CALIFORNIA**
(Pursuant to Government Code Section 11005)

By: _____
Name: Michael P. Butler
Title: Assistant Section Chief
Real Property Services Section

State of California)

County of _____)

On _____, 20__ before me, _____, notary,
(here insert name and title of the officer)

personally appeared _____ who proved to me on the basis of satisfactory evidence to be the person(s) whose name(s) is/are subscribed to the within instrument and acknowledged to me that he/she/they executed the same in his/her/their authorized capacity(ies), and that by his/her/their signature(s) on the instrument the person(s), or the entity upon behalf of which the person(s) acted, executed the instrument.

I certify under PENALTY OF PERJURY under the laws of the State of California that the foregoing paragraph is true and correct.

WITNESS my hand and official seal.

Signature _____

(Seal)

State of California)

County of _____)

On _____, 20__ before me, _____, notary,
(here insert name and title of the officer)

personally appeared _____ who proved to me on the basis of satisfactory evidence to be the person(s) whose name(s) is/are subscribed to the within instrument and acknowledged to me that he/she/they executed the same in his/her/their authorized capacity(ies), and that by his/her/their signature(s) on the instrument the person(s), or the entity upon behalf of which the person(s) acted, executed the instrument.

I certify under PENALTY OF PERJURY under the laws of the State of California that the foregoing paragraph is true and correct.

WITNESS my hand and official seal.

Signature _____

(Seal)

CERTIFICATE OF ACCEPTANCE

This is to certify that, pursuant to Section 27281 of the California Government Code, the interest in real property conveyed by the Ground Lease dated as of _____, 20__ for reference only from the County of _____, a Political Subdivision of the State of California to the State of California on behalf of the Department of Corrections and Rehabilitation of the State of California is hereby accepted by the undersigned officer on behalf of the State Public Works Board pursuant to authority conferred by said Board in its duly adopted delegation resolution on December 13, 2013.

Note to Recorder: If this certificate is for a correction deed, all corrections and/or changes to the previously recorded deed must be reviewed and accepted by the State prior to recording a correction deed. All correction deeds require a new Certificate of Acceptance dated subsequent to recordation of the original deed or the most recent correction deed if any.

ACCEPTED

STATE PUBLIC WORKS BOARD OF THE
STATE OF CALIFORNIA

By: _____

Name: Stephen Benson

Title: Deputy Director

Date: _____

APPROVED

DEPARTMENT OF CORRECTIONS AND
REHABILITATION OF THE STATE OF
CALIFORNIA

By: _____

Name: Deborah Hysen

Title: Deputy Director
Facility Planning, Construction
and Management

Date: _____

APPROVED

DEPARTMENT OF GENERAL SERVICES OF
THE STATE OF CALIFORNIA
(Pursuant to Government Code Section 11005)

By: _____

Name: Michael P. Butler

Title: Assistant Section Chief
Real Property Services Section

Date: _____

EXHIBIT A

Project Description

(Project Name)

PROJECT SCOPE

(Insert Project Scope from PDCA)

FORM OF DOCUMENT

EXHIBIT B

Legal Description of the Site

[To be attached]

FORM OF DOCUMENT

EXHIBIT C

Form of Easement Agreement for Grants of Access, Utilities and Repairs

**RECORDING REQUESTED BY
AND WHEN RECORDED RETURN TO:**

NO DOCUMENTARY TRANSFER TAX DUE. This Ground Lease is recorded for the benefit of the State of California and is exempt from California transfer tax pursuant to Section 11928 of the California Revenue and Taxation code and from recording fees pursuant to Sections 6103 and 27383 of the California Government Code.

[THE AREA ABOVE IS RESERVED FOR RECORDER'S USE]

**EASEMENT AGREEMENT FOR GRANTS OF
ACCESS, UTILITIES AND REPAIRS**

This Easement Agreement for Grants of Access, Utilities and Repairs (this "Easement Agreement"), dated for reference only as of _____, 20__, is made by and between COUNTY OF _____, (the "Participating County"), a Political Subdivision of the State of California, as grantor, and the DEPARTMENT OF CORRECTIONS AND REHABILITATION OF THE STATE OF CALIFORNIA (the "Department"), an entity of state government of the State of California, as grantee.

RECITALS

A. The Participating County, as landlord, and the Department as tenant, entered into a ground lease dated as of _____, 20__ for reference only, (the "Ground Lease") for the lease of that certain real property located in the County of [_____] and more particularly described in Exhibit 1, attached hereto and incorporated herein by this reference (the "Site"); and

B. The Ground Lease provides that the Participating County, as owner of certain real property adjacent to the Site, shall grant Easements to the Department in the Easement Property, which is more particularly described in Exhibit 2, attached hereto and incorporated herein by this reference; and

C. The Participating County and the Department desire to the grant of Easements in the Easement Property on the terms and conditions contained in this Easement Agreement.

NOW, THEREFORE, for good and valuable consideration, the receipt and sufficiency of which are hereby acknowledged, the Parties hereto hereby agree as follows:

1. Definitions. Unless otherwise required by the context, all capitalized terms used herein and not defined herein shall have the meanings assigned to such terms in the Ground Lease or the Project Delivery and Construction Agreement.

2. Grant and Description of Easements.

2.1 Grant of Access Easement. The Participating County, as the owner of the Easement Property, hereby establishes and grants to and for the benefit of the Department and the Board and their respective contractors, subcontractors, employees, lessees, licensees, permittees, successors and assigns a non-exclusive easement over and across the Easement Property as shown in Exhibit 2 hereto for purposes of ingress and egress to and from the Site and the Project (the "Access Easement"); provided, however, that rights pursuant to such Access Easement shall only be exercised if there is no reasonable access to the Site and the Project via adjacent public streets and roadways and subject to the security limitations set forth in Section 2.3 hereof; and provided further, that such Access Easement is only effective (i) during such times where the Department, or its lessees, successors or assigns, is in possession of the Facility and is responsible for maintenance and repair of the Facility under the terms of the Facility Sublease or (ii) during such times where the Board, or its lessees, successors or assigns, is in possession of the Facility and is responsible for maintenance and repair of the Facility under the terms of the Facility Lease.

2.2 Grant of Utilities and Repairs Easement. The Participating County, as the owner of the Easement Property, hereby grants to and for the benefit of the Department and the Board and their respective contractors, subcontractors, employees, lessees, licensees, permittees, successors and assigns a non-exclusive easement across, over and under the Easement Property as shown in Exhibit 2 hereto for the purpose of: a) installation, maintenance and replacement of utility wires, cables, conduits and pipes for "Utilities", as defined below; and b) other purposes and uses necessary or desirable for the repair, operation and maintenance of the Facility (the "Utilities and Repairs Easement" and together with the Access Easement, the "Easements"); provided, however, that such Utilities and Repairs Easement is subject to the security limitations set forth in Section 2.3 hereof; and; provided further, that such Utilities and Repairs Easement is only effective (i) during such times where the Department, or its lessees, successors or assigns, is in possession of the Facility and is responsible for maintenance and repair of the Facility under the terms of the Facility Sublease or (ii) during such times where the Board, or its lessees, successors or assigns, is in possession of the Facility and is responsible for maintenance and repair of the Facility under the terms of the Facility Lease. "Utilities" shall mean any and all wet and dry utilities (including sewer) necessary or required to service the Facility, including, without limitation, all electrical, natural gas, water, sewer, telephone, data, and other telecommunications services.

2.3 Security Limitation on Easements. The exercise of the rights granted under the Easements will be expressly subject to the limitations and requirements imposed by the Participating County's customary security measures for the Participating County's facilities that may be located on the Easement Property (the "Security Measures"). Prior to the exercise of any rights under the Easements, the Department or the Board, as the case may be, or their respective lessees, successors or assigns shall contact the [Title of Appropriate Individual at Participating County] to ensure that such exercise of rights granted under the Easements will be in compliance

with the requirements of the Security Measures.

3. No Unreasonable Interference. The Participating County shall not conduct any activity on, under or about the Easement Property that would unreasonably interfere with the use of the Easements.

4. Term of Easement Agreement; No Termination by Breach. The term of this Easement Agreement shall be coextensive with the Term of the Ground Lease, as such Term may be extended or terminated as provided in the Ground Lease. No breach of this Easement Agreement shall entitle any of the parties hereunder to cancel, rescind, or otherwise terminate this Easement Agreement, but such limitation shall not affect in any manner any other rights or remedies which a party may have hereunder by reason of any breach.

5. Character. The Easements granted by this Easement Agreement shall be appurtenant to the Site and nonexclusive and for the use and benefit of the Department and the Board. This Easement Agreement is not intended to grant a fee interest in the Easement Property, nor is it intended to be a lease or a license. The Department acknowledges that the Easements herein granted are nonexclusive easements and that the Participating County and its successors and assigns may grant one or more additional non-exclusive easements in the Easement Property to third parties, so long as the rights granted by such easements do not materially interfere with or hinder the use of the Easements by the Department or the Board or that of their respective lessees, successors or assigns.

6. Covenants Running with the Land; Binding on Successors. Pursuant to California Civil Code section 1468, this Easement Agreement and the Easements are covenants related to the use, repair, maintenance and improvement of the properties benefited and burdened hereby, and, as such, the covenants set forth herein shall be binding upon the Easement Property and shall be binding upon all parties having or in the future acquiring any interest in the Easement Property.

7. Binding Effect. This Easement Agreement shall be binding on and shall inure to the benefit of the lessees, successors and assigns of the Participating County, the Department, and the Board.

8. Recordation of Easement Agreement. This Easement Agreement shall be recorded in the Official Records of [_____] County, State of California, and shall serve as notice to all parties succeeding to the interest of the parties hereto that their use of the Site and the Project and the Easement Property shall be benefited or restricted, or both, in the manner herein described.

9. Entire Agreement; Amendments. This Easement Agreement contains the entire agreement of the parties hereto relating to the Easements herein granted. Any representations or modifications concerning this Easement Agreement shall be of no force and effect, excepting a subsequent modification in writing, signed by the Department and approved by the Board and the current owner of the Easement Property and recorded in the Official Records of [_____] County, State of California.

10. Warranty of Authority. The Participating County represents and warrants as of

the Effective Date that (i) it is the legal owner of the Easement Property, (ii) it has full power and authority to place the encumbrance of this Easement Agreement on the Easement Property, (iii) it has not conveyed (or purported to convey) any right, title or interest in or to the Easement Property, except as has been disclosed in writing to the Department prior to the Effective Date, and (iv) if necessary, it has the written consent of any lenders, tenants and subtenants of the Easement Property to the terms and conditions of this Easement Agreement.

11. Counterparts. This Easement Agreement may be signed in multiple counterparts which, when signed by all parties, shall constitute a binding agreement.

IN WITNESS WHEREOF, the parties hereto have caused this Easement Agreement to be executed by their respective officers thereunto duly authorized, all as of the day and year first written above.

THE COUNTY OF [COUNTY]

By: _____

Name:

Title:

**DEPARTMENT OF CORRECTIONS
AND REHABILITATION OF THE
STATE OF CALIFORNIA**

By: _____

Name:

Title:

**CONSENT: STATE PUBLIC WORKS
BOARD OF THE STATE OF CALIFORNIA**

By: _____

Name:

Title: Executive Director or Deputy Director

**APPROVED: DEPARTMENT OF GENERAL
SERVICES OF THE STATE OF
CALIFORNIA**

(Pursuant to Government Code Section 11005)

By: _____

Name:

Title:

State of California)

County of _____)

On _____, 20__ before me, _____, notary,
(here insert name and title of the officer)

personally appeared _____ who proved to me on the basis of satisfactory evidence to be the person(s) whose name(s) is/are subscribed to the within instrument and acknowledged to me that he/she/they executed the same in his/her/their authorized capacity(ies), and that by his/her/their signature(s) on the instrument the person(s), or the entity upon behalf of which the person(s) acted, executed the instrument.

I certify under PENALTY OF PERJURY under the laws of the State of California that the foregoing paragraph is true and correct.

WITNESS my hand and official seal.

Signature _____

(Seal)

State of California)

County of _____)

On _____, 20__ before me, _____, notary,
(here insert name and title of the officer)

personally appeared _____ who proved to me on the basis of satisfactory evidence to be the person(s) whose name(s) is/are subscribed to the within instrument and acknowledged to me that he/she/they executed the same in his/her/their authorized capacity(ies), and that by his/her/their signature(s) on the instrument the person(s), or the entity upon behalf of which the person(s) acted, executed the instrument.

I certify under PENALTY OF PERJURY under the laws of the State of California that the foregoing paragraph is true and correct.

WITNESS my hand and official seal.

Signature _____

(Seal)

CERTIFICATE OF ACCEPTANCE

This is to certify that, pursuant to Section 27281 of the California Government Code, the easement interest in real property conveyed by the Easement Agreement for Grants of Access Utilities, and Repairs dated as of _____, 20__ for reference only from the County of _____, a Political Subdivision of the State of California to the State of California on behalf of the Department of Corrections and Rehabilitation of the State of California is hereby accepted by the undersigned officer on behalf of the State Public Works Board pursuant to authority conferred by said Board in its duly adopted delegation resolution on December 13, 2013.

Note to Recorder: If this certificate is for a correction deed, all corrections and/or changes to the previously recorded deed must be reviewed and accepted by the State prior to recording a correction deed. All correction deeds require a new Certificate of Acceptance dated subsequent to recordation of the original deed or the most recent correction deed if any.

ACCEPTED

STATE PUBLIC WORKS BOARD OF THE
STATE OF CALIFORNIA

By: _____
Name: _____
Title: _____

Date: _____

APPROVED

DEPARTMENT OF CORRECTIONS AND
REHABILITATION OF THE STATE OF
CALIFORNIA

By: _____
Name: _____
Title: _____

Date: _____

APPROVED

DEPARTMENT OF GENERAL SERVICES OF
THE STATE OF CALIFORNIA
(Pursuant to Government Code Section 11005)

By: _____
Name: _____
Title: _____

Date: _____

EXHIBIT 1 TO EASEMENT AGREEMENT

LEGAL DESCRIPTION OF THE SITE

(To Be Attached)

FORM OF DOCUMENT

EXHIBIT 2 TO EASEMENT AGREEMENT

LEGAL DESCRIPTION OF THE EASMENT PROPERTY

(To Be Attached)

FORM OF DOCUMENT

EXHIBIT D

Form of Legal Opinion Letter

[LEGAL COUNSEL LETTERHEAD]

[Client]

State Public Works Board
of the State of California
Sacramento, California

Re: Ground Lease By and Between [insert name of the Participating County] and the Department for the [insert name of the Project] Located at [insert address of the Site]

Ladies and Gentlemen:

I am legal counsel for [insert name of client] with respect to the above referenced matter. I have examined originals or copies, certified or otherwise identified to my satisfaction, of such documents, exhibits, public records and other instruments in connection with the Ground Lease dated as of _____, 20__ for reference only between [insert name of the Participating County], as landlord, and the Department of Corrections and Rehabilitation of the State of California (the "Department"), as tenant, (the "Ground Lease"), and have conducted such other investigations of fact and law as I have deemed necessary for the purpose of this opinion.

I am of the opinion that:

[Use one of the following alternatives]

[Alternative 1: If the Participating County is the client]

1. The [insert name of the Participating County] is a political subdivision of the State of California created in accordance with the provisions of the Constitution of the State of California, with full legal right, power and authority to enter into and perform its obligations under the Ground Lease *[if easements are being granted under the terms of an Easement Agreement in the form of Exhibit C to the Ground Lease, add: "and Easement Agreement in the form attached as Exhibit C to the Ground Lease" and revise letter accordingly].*

[Alternative 2: If the Department is the client]

1. The Department is an entity of state government of the State of California with full legal right, power and authority to enter into and perform its obligations under the Ground

Lease [if easements are being granted under the terms of an Easement Agreement in the form of Exhibit C to the Ground Lease, add: “and Easement Agreement in the form attached as Exhibit C to the Ground Lease” and revise letter accordingly].

[The following provisions apply regardless of the client]

2. The Ground Lease [and Easement Agreement] [has/have] been duly authorized, executed and delivered by [insert name of client], and [is/are] valid and binding upon and enforceable against the [insert name of client] in accordance with [its/their] terms if [it is/they are] in like fashion valid and binding upon and enforceable against the respective other parties thereto, except that enforceability may be limited by bankruptcy, insolvency and other laws affecting the enforcement of creditors’ rights generally and by the application of equitable principles if equitable remedies are sought.

3. The execution and delivery by the [insert name of client] of the Ground Lease [and Easement Agreement] and compliance with the provisions thereof do not and will not materially conflict with or constitute on the part of the [insert name of client] a breach of or a default under the law, administrative regulation, judgment, decree or any agreement or other instrument known to me which the [insert name of client] is a party or otherwise subject.

4. All actions on the part of the [insert name of client] necessary for the execution and performance of the Ground Lease [and Easement Agreement] have been duly and effectively taken, and no consent, authorization or approval of, or filing or registration with, any governmental or regulatory officer or body not already obtained or not obtainable in due course by the [insert name of client] is required to be obtained by the [insert name of client] for the making and performance of the Ground Lease [and Easement Agreement] .

5. There is no action, suit or proceeding pending (with the service of process having been accomplished) to restrain or enjoin the execution and delivery of the Ground Lease [and Easement Agreement], or in any way contesting or affecting the validity of the Ground Lease [and Easement Agreement].

Very truly yours,

[INSERT NAME OF CLIENT]

By: _____

Name: _____

Its: _____

EXHIBIT E

List of the Permitted Encumbrances

[To be inserted]

1. Right of Entry for Construction and Operation

FORM OF DOCUMENT

EXHIBIT F

Pending and Threatened Lawsuits

[To be inserted]

FORM OF DOCUMENT

EXECUTION COPY

**RECORDING REQUESTED BY
AND WHEN RECORDED RETURN TO:**

NO DOCUMENTARY TRANSFER TAX DUE. This Ground Lease is recorded for the benefit of the State of California and is exempt from California transfer tax pursuant to Section 11928 of the California Revenue and Taxation code and from recording fees pursuant to Sections 6103 and 27383 of the California Government Code.

[THE AREA ABOVE IS RESERVED FOR RECORDER'S USE]

**EASEMENT AGREEMENT FOR GRANTS OF
ACCESS, UTILITIES AND REPAIRS**

This Easement Agreement for Grants of Access, Utilities and Repairs (this "Easement Agreement"), dated for reference only as of _____, 20___, is made by and between COUNTY OF _____, (the "Participating County"), a Political Subdivision of the State of California, as grantor, and the DEPARTMENT OF CORRECTIONS AND REHABILITATION OF THE STATE OF CALIFORNIA (the "Department"), an entity of state government of the State of California, as grantee. The Participating County and the Department are sometimes referred to collectively as the "Parties" and individually as a "Party."

RECITALS

A. The Participating County, as landlord, and the Department as tenant, entered into a ground lease dated as of _____, 20___ for reference only, (the "Ground Lease") for the lease of that certain real property located in the County of _____ and more particularly described in Exhibit 1, attached hereto and incorporated herein by this reference (the "Site"); and

B. The Ground Lease provides that the Participating County, as owner of certain real property adjacent to the Site, shall grant Easements to the Department in the Easement Property, which is more particularly described in Exhibit 2, attached hereto and incorporated herein by this reference; and

C. The Participating County desires to grant and the Department desires to accept the grant of Easements in the Easement Property on the terms and conditions contained in this Easement Agreement.

NOW, THEREFORE, for good and valuable consideration, the receipt and sufficiency of which are hereby acknowledged, the Parties hereto hereby agree as follows:

1. Definitions. Unless otherwise required by the context, all capitalized terms used herein and not defined herein shall have the meanings assigned to such terms in the Ground Lease or the Project Delivery and Construction Agreement.

2. Grant and Description of Easements.

2.1 Grant of Access Easement. The Participating County, as the owner of the Easement Property, hereby establishes and grants to and for the benefit of the Department and the Board and their respective contractors, subcontractors, employees, lessees, licensees, permittees, successors and assigns a non-exclusive easement over and across the Easement Property as shown in Exhibit 2 hereto for purposes of ingress and egress to and from the Site and the Project (the "Access Easement"); provided, however, that rights pursuant to such Access Easement shall only be exercised if there is no reasonable access to the Site and the Project via adjacent public streets and roadways and subject to the security limitations set forth in Section 2.3 hereof; and provided further, that such Access Easement is only effective (i) during such times where the Department, or its lessees, successors or assigns, is in possession of the Facility and is responsible for maintenance and repair of the Facility under the terms of the Facility Sublease or (ii) during such times where the Board, or its lessees, successors or assigns, is in possession of the Facility and is responsible for maintenance and repair of the Facility under the terms of the Facility Lease.

2.2 Grant of Utilities and Repairs Easement. The Participating County, as the owner of the Easement Property, hereby grants to and for the benefit of the Department and the Board and their respective contractors, subcontractors, employees, lessees, licensees, permittees, successors and assigns a non-exclusive easement across, over and under the Easement Property as shown in Exhibit 2 hereto for the purpose of: a) installation, maintenance and replacement of utility wires, cables, conduits and pipes for "Utilities", as defined below; and b) other purposes and uses necessary or desirable for the repair, operation and maintenance of the Facility (the "Utilities and Repairs Easement" and together with the Access Easement, the "Easements"); provided, however, that such Utilities and Repairs Easement is subject to the security limitations set forth in Section 2.3 hereof; and; provided further, that such Utilities and Repairs Easement is only effective (i) during such times where the Department, or its lessees, successors or assigns, is in possession of the Facility and is responsible for maintenance and repair of the Facility under the terms of the Facility Sublease or (ii) during such times where the Board, or its lessees, successors or assigns, is in possession of the Facility and is responsible for maintenance and repair of the Facility under the terms of the Facility Lease. "Utilities" shall mean any and all wet and dry utilities (including sewer) necessary or required to service the Facility, including, without limitation, all electrical, natural gas, water, sewer, telephone, data, and other telecommunications services.

2.3 Security Limitation on Easements. The exercise of the rights granted under the Easements will be expressly subject to the limitations and requirements imposed by the Participating County's customary security measures for the Participating County's facilities that may be located on the Easement Property (the "Security Measures"). Prior to the exercise of any rights under the Easements, the Department or the Board, as the case may be, or their respective lessees, successors or assigns shall contact the [Title of Appropriate Individual at Participating County] to ensure that such exercise of rights granted under the Easements will be in compliance with the requirements of the Security Measures.

3. No Unreasonable Interference. The Participating County shall not conduct any activity on, under or about the Easement Property that would unreasonably interfere with the use

of the Easements.

4. Term of Easement Agreement; No Termination by Breach. The term of this Easement Agreement shall be coextensive with the Term of the Ground Lease, as such Term may be extended or terminated as provided in the Ground Lease. No breach of this Easement Agreement shall entitle any of the Parties hereunder to cancel, rescind, or otherwise terminate this Easement Agreement, but such limitation shall not affect in any manner any other rights or remedies which a Party may have hereunder by reason of any breach.

5. Character. The Easements granted by this Easement Agreement shall be appurtenant to the Site and non-exclusive and for the use and benefit of the Department and the Board. This Easement Agreement is not intended to grant a fee interest in the Easement Property, nor is it intended to be a lease or a license. The Department acknowledges that the Easements herein granted are non-exclusive easements and that the Participating County and its successors and assigns may grant one or more additional non-exclusive easements in the Easement Property to third parties, so long as the rights granted by such easements do not materially interfere with or hinder the use of the Easements by the Department or the Board or that of their respective lessees, successors or assigns.

6. Covenants Running with the Land; Binding on Successors. Pursuant to California Civil Code section 1468, this Easement Agreement and the Easements are covenants related to the use, repair, maintenance and improvement of the properties benefited and burdened hereby, and, as such, the covenants set forth herein shall be binding upon the Easement Property and shall be binding upon all parties having or in the future acquiring any interest in the Easement Property.

7. Binding Effect. This Easement Agreement shall be binding on and shall inure to the benefit of the lessees, successors and assigns of the Participating County, the Department, and the Board.

8. Recordation of Easement Agreement. This Easement Agreement shall be recorded in the Official Records of _____ County, State of California, and shall serve as notice to all parties succeeding to the interest of the Parties hereto that their use of the Site and the Project and the Easement Property shall be benefited or restricted, or both, in the manner herein described.

9. Entire Agreement; Amendments. This Easement Agreement contains the entire agreement of the Parties hereto relating to the Easements herein granted. Any representations or modifications concerning this Easement Agreement shall be of no force and effect, excepting a subsequent modification in writing, signed by the Department and approved by the Board and the current owner of the Easement Property and recorded in the Official Records of _____ County, State of California.

10. Warranty of Authority. The Participating County represents and warrants as of the Effective Date that (i) it is the legal owner of the Easement Property, (ii) it has full power and authority to place the encumbrance of this Easement Agreement on the Easement Property, (iii) it has not conveyed (or purported to convey) any right, title or interest in or to the Easement

Property, except as has been disclosed in writing to the Department prior to the Effective Date, and (iv) if necessary, it has the written consent of any lenders, tenants and subtenants of the Easement Property to the terms and conditions of this Easement Agreement.

11. Counterparts. This Easement Agreement may be signed in multiple counterparts which, when signed by all Parties, shall constitute a binding agreement.

IN WITNESS WHEREOF, the Parties hereto have caused this Easement Agreement to be executed by their respective officers thereunto duly authorized, all as of the day and year first written above.

THE COUNTY OF _____

By: _____

Name: _____

Title: _____

**DEPARTMENT OF CORRECTIONS
AND REHABILITATION OF THE
STATE OF CALIFORNIA**

By: _____

Name: Deborah Hysen

Title: Director
Facility Planning, Construction
and Management

**CONSENT: STATE PUBLIC WORKS
BOARD OF THE STATE OF CALIFORNIA**

By: _____

Name: Stephen Benson

Title: Deputy Director

**APPROVED: DEPARTMENT OF GENERAL
SERVICES OF THE STATE OF
CALIFORNIA**

(Pursuant to Government Code Section 11005)

By: _____

Name: Michael P. Butler

Title: Section Chief
Real Property Services Section

A Notary Public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

State of California)

County of _____)

On _____, 20__ before me, _____, notary,
(here insert name and title of the officer)

personally appeared _____ who proved to me on the basis of satisfactory evidence to be the person(s) whose name(s) is/are subscribed to the within instrument and acknowledged to me that he/she/they executed the same in his/her/their authorized capacity(ies), and that by his/her/their signature(s) on the instrument the person(s), or the entity upon behalf of which the person(s) acted, executed the instrument.

I certify under PENALTY OF PERJURY under the laws of the State of California that the foregoing paragraph is true and correct.

WITNESS my hand and official seal.

Signature _____

(Seal)

A Notary Public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

State of California)

County of _____)

On _____, 20__ before me, _____, notary,
(here insert name and title of the officer)

personally appeared _____ who proved to me on the basis of satisfactory evidence to be the person(s) whose name(s) is/are subscribed to the within instrument and acknowledged to me that he/she/they executed the same in his/her/their authorized capacity(ies), and that by his/her/their signature(s) on the instrument the person(s), or the entity upon behalf of which the person(s) acted, executed the instrument.

I certify under PENALTY OF PERJURY under the laws of the State of California that the foregoing paragraph is true and correct.

WITNESS my hand and official seal.

Signature _____

(Seal)

CERTIFICATE OF ACCEPTANCE

This is to certify that, pursuant to Section 27281 of the California Government Code, the easement interest in real property conveyed by the Easement Agreement for Grants of Access Utilities, and Repairs dated as of _____, 20__ for reference only from the County of _____, a Political Subdivision of the State of California to the State of California on behalf of the Department of Corrections and Rehabilitation of the State of California is hereby accepted by the undersigned officer on behalf of the State Public Works Board pursuant to authority conferred by said Board in its duly adopted delegation resolution on December 13, 2013.

Note to Recorder: If this certificate is for a correction deed, all corrections and/or changes to the previously recorded deed must be reviewed and accepted by the State prior to recording a correction deed. All correction deeds require a new Certificate of Acceptance dated subsequent to recordation of the original deed or the most recent correction deed if any.

ACCEPTED

STATE PUBLIC WORKS BOARD OF THE
STATE OF CALIFORNIA

By: _____
Name: Stephen Benson
Title: Deputy Director

Date: _____

APPROVED

DEPARTMENT OF CORRECTIONS AND
REHABILITATION OF THE STATE OF
CALIFORNIA

By: _____
Name: Deborah Hysen
Title: Director
Facility Planning, Construction and
Management

Date: _____

APPROVED

DEPARTMENT OF GENERAL SERVICES OF
THE STATE OF CALIFORNIA
(Pursuant to Government Code Section 11005)

By: _____
Name: Michael P. Butler
Title: Section Chief
Real Property Services Section

Date: _____

EXHIBIT 1 TO EASEMENT AGREEMENT

LEGAL DESCRIPTION OF THE SITE

[To Be Attached]

EXHIBIT 2 TO EASEMENT AGREEMENT
LEGAL DESCRIPTION OF THE EASMENT PROPERTY

[To Be Attached]

EXHIBIT C

FORM OF RIGHT OF ENTRY FOR CONSTRUCTION AND OPERATION

<p>Location of Site</p> <p>_____</p> <p>_____</p>
<p>Agency: Department of Corrections and Rehabilitation of the State of California</p> <p>Real Property: _____</p>

RIGHT OF ENTRY FOR CONSTRUCTION AND OPERATION

This RIGHT OF ENTRY FOR CONSTRUCTION AND OPERATION AGREEMENT (this “License”) is entered into as of _____ 20__, by and between the DEPARTMENT OF CORRECTIONS AND REHABILITATION OF THE STATE OF CALIFORNIA (the “Department”), an entity of state government of the State of California (the “State”), as licensor, and the COUNTY OF _____, (the “Participating County”), a political subdivision of the State of California, as licensee. The Department and the Participating County are sometimes individually referred to as “Party” and collectively as “Parties”.

RECITALS

WHEREAS, pursuant to Chapter 3.12 of Part 10b of Division 3 of Title 2 of the California Government Code (commencing at Section 15820.91), the State Public Works Board (the “Board”) is authorized to finance the acquisition, design and construction of a jail facility approved by the Board of State and Community Corrections (the “BSCC”) pursuant to Section 15820.916 of the California Government Code (the “AB 900 Jail Financing Program”); and

WHEREAS, the Participating County has proposed to build a jail facility, the _____ project (the “Project”), to be located at _____ real property controlled by the Participating County through fee-simple ownership (the “Site”); and

WHEREAS, contemporaneous with entry into this License, Participating County intends to lease the Site to the Department pursuant to a Ground Lease executed by and between the Participating County and the Department and consented to by the Board (the “Ground Lease”); and

WHEREAS, the Department, as lessee under the Ground Lease intends to provide the Participating County access to the Site for the purpose of jail construction-related activities and for operation of the Project upon substantial completion of construction.

WITNESSETH

NOW THEREFORE, FOR AND IN CONSIDERATION of the mutual agreements by the Parties set forth herein and other good and valuable consideration, this License is subject to the following terms and conditions:

1. Grant of License – The Department hereby grants to the Participating County, its employees, consultants, representatives and contractors a non-exclusive, temporary license to enter the Site for site analysis, Project construction-related activities, and for operation of the Project upon substantial completion of construction (“Activities”), all as contemplated by that certain Project Delivery and Construction Agreement by and among the Department, the Board, the BSCC and the Participating County (the “PDCA”). This License is subordinate to all prior or future rights and obligations of the Department and the Board in the Site, except that the Department and the Board shall grant no rights inconsistent with the reasonable exercise by the Participating County of its rights under this License.
2. License Term – This License shall commence on the Effective Date of the Ground Lease and shall terminate on the date of termination of the PDCA (the “Term”).
3. Compliance with Laws – The Participating County shall conduct all Activities in compliance with all Federal, State and municipal statutes and ordinances, and with all regulations, orders and directives of appropriate governmental agencies (“Laws and Regulations”), as such Laws and Regulations exist during the Term of this License.
4. Inspections – The Department, the Board, and their representatives, employees, agents or independent contractors may enter and inspect the Site or any portion thereof or any improvements thereon, and the Project at any time and from time to time at reasonable times to verify the Participating County’s compliance with the terms and conditions of this License.
5. Special Condition – In the performance of the required studies and tests, the Participating County acknowledges that the Participating County will practice all due diligence to protect the Site.
6. Cooperation – In the event the Department or the Board has business on the Site or the Project, the Participating County agrees to coordinate the Activities with the Department or the Board to minimize any impairment of access to the Site or the Project and any inconvenience to or disruption of the Department’s or the Board’s business. Department and Board agree to coordinate their business at the Site or the Project so as to minimize any delay or disruption of the Participating County’s Activities.
7. Indemnity – As required by California Government Code Section 15820.915 the Participating County hereby agrees that it shall indemnify, defend and save harmless the State, including but not limited to the Board, CDCR and BSCC, and each of their respective officers, governing members, directors, officials, employees, subcontractors, consultants, and agents (collectively, “Indemnitees”) for any and all claims and losses arising out of the acquisition, design,

construction, and operation of the Project, including, but not limited to all demands, causes of actions and liabilities of every kind and nature whatsoever arising out of, related to, or in connection with (a) any breach of this License by the Participating County; (b) operation, maintenance, use and occupancy of the Project; (c) any acts or omissions of any contractor hired by the Participating County or its agents or subcontractor hired by such contractor; and (d) personal injury, bodily injury or property damage resulting from the Activities of the Participating County, its employees, consultants, representatives and contractors (collectively, "Claims"). The Participating County's obligation to indemnify, defend and save harmless the Indemnitees shall extend to all Claims arising, occurring, alleged, or made at any time, including prior to, during, or after the period that this License is in full force and effect. The Participating County shall not be obligated to provide indemnity or defense for an Indemnitee where the claim arises out of the active negligence or willful misconduct of the Indemnitee. The indemnification obligations of the Participating County set forth in this Section shall survive any termination of this License.

8. Insurance – The Participating County shall maintain the following insurances: 1) Commercial General Liability with limits of no less than one million dollars (\$1,000,000) per occurrence and Fire Legal Liability of no less than five hundred thousand dollars (\$500,000); 2) Automobile Liability with a combined single limit of no less than one million dollars (\$1,000,000) per accident and 3) Workers Compensation as required by law and Employers Liability with limits of no less than one million dollars (\$1,000,000) per occurrence. The Participating County shall be solely responsible for monitoring and ensuring that the necessary Workers Compensation Insurance is in effect for all persons entering onto the Site.
9. Utilities – The Department makes no guarantee as to the reliability or availability of utility services. The Department shall not supply any utility services to the Site or the Project.
10. Taxes and Assessments – It is expressly understood that this License is not exclusive and does not in any way whatsoever grant or convey any permanent easement, lease, fee or other interest in the Site or the Project to the Participating County. Any such acquisition of use rights shall be separate agreements at the sole discretion of the Department and the Board. Should taxes or assessments be levied upon any interest in this License, the Participating County agrees to pay all lawful taxes, assessments or charges created by this License. It is understood that this License may create a possessory interest subject to property taxation and the Participating County may be subject to the payment of property taxes levied on such interest.
11. Continuing Liability – No termination of this License shall release the Participating County from any liability or obligations hereunder resulting from any acts, omissions or events happening prior to the termination of this License and restoration of the Site to its prior condition.

- 12. Attorneys' Fees – In the event of a dispute between the Parties with respect to the terms or condition of this License, it is agreed that each Party, including the prevailing Party, must bear its own costs and attorneys' fees.
- 13. Assignment, Subletting and Change in Use – The Participating County shall not transfer or assign this License and shall not sublet, license, permit or suffer any use of the Site or the Project or any part thereof.
- 14. Notices –
 - a. All notices or other communications required or permitted hereunder shall be in writing and shall be personally delivered (including by means of professional messenger service), sent by overnight courier, or sent by registered or certified mail, postage prepaid, return receipt requested to the addresses set forth below.
 - b. All such notices or other communications shall be deemed received upon the earlier of 1) if personally delivered or sent by overnight courier, the date of delivery to the address of the person to receive such notices or 2) if mailed as provided above, on the date of receipt or rejection.

To the Department: California Department of Corrections and Rehabilitation
9838 Old Placerville Road, Suite B
Sacramento, CA 95827
Attention: Deputy Director, Facility Planning, Construction and Management
Facsimile: 916-322-5717

To the Board: State Public Works Board
915 L Street, 9th Floor
Sacramento, CA 95814
Attention: Executive Director
Facsimile: 916-449-5739

To the Participating County: _____ [County Name]
_____ [Address 1]
_____ [Address 2]
Attention: _____ [Title]
Facsimile: _____

- c. Notice of change of address or telephone number shall be given by written notice in the manner described in this Paragraph. The Participating County is obligated to notice all State offices listed above and the failure to provide notice to all State offices will be deemed to constitute a lack of notice.
- 15. Entire Agreement – This License contains all the agreements of the Parties regarding right of entry for construction and supersedes any prior License or

negotiations. There have been no representations by the Department or understandings made between the Department and the Participating County regarding right of entry for construction and operation other than those set forth in this License. This License may not be modified except by a written instrument duly executed by the Parties hereto with the consent of the Board.

- 16. Counterparts – This License may be executed in one or more counterparts, each of which shall be deemed as original but all of which together shall constitute one and the same instrument.

IN WITNESS WHEREOF, the Parties have executed this License by their duly authorized representatives on the date first above written.

THE COUNTY OF _____

By: _____
Name: _____
Title: _____

**DEPARTMENT OF CORRECTIONS
AND REHABILITATION OF THE
STATE OF CALIFORNIA**

By: _____
Name: Deborah Hysen
Title: Deputy Director
Facility Planning, Construction and
Management

**CONSENT: STATE PUBLIC
WORKS BOARD OF THE
STATE OF CALIFORNIA**

By: _____
Name: Stephen Benson
Title: Deputy Director

**APPROVED: DEPARTMENT OF
GENERAL SERVICES OF THE
STATE OF CALIFORNIA**
(Pursuant to Government Code Section 11005)

By: _____
Name: Michael P. Butler
Title: Assistant Section Chief
Real Property Services Section

FORM OF DOCUMENT

EXHIBIT D

FORM OF FACILITY SUBLEASE

NOTE: THIS IS A GENERAL FORM OF FACILITY SUBLEASE ONLY. THE STATE PUBLIC WORKS BOARD AND THE STATE'S FINANCING TEAM HAVE FULL RIGHT AND AUTHORITY TO ALTER, CHANGE, AND MODIFY THIS GENERAL FORM AS NECESSARY, UPON ADVICE OF COUNSEL, TO FACILITATE THE FINANCING AS THEY DEEM NECESSARY.

RECORDING REQUESTED BY)
AND WHEN RECORDED MAIL TO:)
)
[ADDRESS])
_____)
_____)
Attention:)

[Space above for Recorder's use]

FACILITY SUBLEASE
by and between the

DEPARTMENT OF CORRECTIONS AND REHABILITATION
OF THE STATE OF CALIFORNIA,
as Sublessor

and

County of [COUNTY],
as Sublessee

Dated as of _____, 20__

[PROJECT NAME]
([COUNTY])

NO DOCUMENTARY TRANSFER TAX DUE. This Facility Sublease is recorded for the benefit of the State of California and is exempt from California documentary transfer tax pursuant to Section 11928 of the California Revenue and Taxation Code and from recording fees pursuant to Sections 6103 and 27383 of the California Government Code.

TABLE OF CONTENTS

	Page
SECTION 1.	Definitions..... 2
SECTION 2.	Sublease of the Facility to the Participating County; Right of Entry 2
SECTION 3.	Term..... 2
SECTION 4.	Consideration and Conflicts between Documents 2
SECTION 5.	Purpose and Use..... 2
SECTION 6.	Obligations of Participating County 3
SECTION 7.	Insurance 3
SECTION 8.	Assignment or Subletting of Facility 5
SECTION 9.	Hazardous Materials 6
SECTION 10.	Termination, Breach, Default and Damages 7
SECTION 11.	Additions, Betterments, Extensions or Improvements; Liens 10
SECTION 12.	Continuing Disclosure 11
SECTION 13.	Status of Private Activity Use of the Facility 11
SECTION 14.	Tax Covenants 11
SECTION 15.	No Merger..... 12
SECTION 16.	Waste..... 12
SECTION 17.	Amendments 12
SECTION 18.	Waiver..... 13
SECTION 19.	Non-Liability of the Department and other State Entities 13
SECTION 20.	Indemnification..... 13
SECTION 21.	Law Governing..... 14
SECTION 22.	Headings 14
SECTION 23.	Notices 14
SECTION 24.	Successors and Assigns..... 15
SECTION 25.	Validity and Severability 15
SECTION 26.	Execution 15
SECTION 27.	Multiple Originals..... 15
SECTION 28.	Net Lease 15
EXHIBIT A	LEGAL DESCRIPTION OF SITE..... A-1

FACILITY SUBLEASE

This Sublease (this "Facility Sublease"), dated as of _____ 1, 20__, is made and entered into by and between the DEPARTMENT OF CORRECTIONS AND REHABILITATION OF THE STATE OF CALIFORNIA, as sublessor (the "Department") and the COUNTY OF [COUNTY], as sublessee (the "Participating County").

RECITALS

WHEREAS, pursuant to Chapter 3.11 of Part 10b of Division 3 of Title 2 of the California Government Code (the "Law"), the State Publics Work Board (the "Board") is authorized to finance the acquisition, design and construction of a jail facility approved by the Corrections Standards Authority pursuant to Section 15820.906 of the Government Code of the State (the "AB 900 Jail Financing Program"); and

WHEREAS, the Participating County [has built/is constructing] a jail facility (the "Project") financed pursuant to the AB 900 Jail Financing Program, which is located on _____, real property controlled by the Participating County through fee-simple ownership (the "Site"); and

WHEREAS, the Participating County has leased the Site to the Department pursuant to a Ground Lease Agreement, dated as of _____ 1, 20__ (the "Ground Lease") executed by and between the Participating County and the Department and consented to by the Board; and

WHEREAS, pursuant to the Law, the Board is authorized to issue lease revenue bonds for the Project (the "Bonds"), the Department, as lessor and the Board, as lessee, entered into a site lease dated as of _____ 1, 20__ (the "Site Lease"), providing for the sublease of the Site to the Board, and the Board, as sublessor, and the Department, as sublessee, entered into a facility lease dated as of _____ 1, 20__ (the "Facility Lease"), providing for the leasing of the Site and the Project (the Site, together with the Project, the "Facility"); and

WHEREAS, The Site Lease and the Facility Lease will provide security for the Bonds issued on the date hereof by the Board under an indenture[... as supplemented by the _____ supplemental indenture], (the "Indenture") between the Board and the Treasurer of the State of California, as trustee (the "State Treasurer"); and

WHEREAS, the Department, pursuant to the Law, is authorized to enter into one or more subleases and/or contracts with the Participating County; and

WHEREAS, the Participating County, as sublessee, will be responsible for all the maintenance and operating costs for the Facility; and

WHEREAS, payment of the Bonds will be made through annual state appropriations to the Department, but the costs of operating and maintaining the Facility will be paid by the Participating County; and

WHEREAS, it is the intent of the parties that upon the payment in full of the Bonds, the Site Lease, the Facility Lease and this Facility Sublease will terminate in accordance with their respective terms and fee title to the Project will vest in the Participating County pursuant to the terms and conditions in the Ground Lease.

NOW THEREFORE, the parties hereto mutually agree as follows:

SECTION 1. Definitions. Unless otherwise required by the context, all capitalized terms used herein and not defined herein shall have the meanings assigned such terms in the Facility Lease or the Indenture.

SECTION 2. Sublease of the Facility to the Participating County Subject to Facility Lease. The Participating County hereby leases the Facility from the Department, and the Department hereby leases the Facility to the Participating County, on the terms and conditions hereinafter set forth, subject to all easements, encumbrances and restrictions of record, including without limitation, the terms and conditions of the Site Lease. A legal description of the Site is attached hereto and incorporated herein as Exhibit A. This Facility Sublease is in all respects subordinate and subject to the Facility Lease. Participating County covenants it shall continuously operate and maintain the Facility and shall have no right to abandon the Facility.

SECTION 3. Term. The term of this Facility Sublease shall commence on the [the first day of the month following the commencement of the Facility Lease/on the date of initial issuance and delivery of the Bonds] and shall co-terminate on the same date as the Facility Lease, unless such term is extended by the parties thereto, or unless sooner terminated as provided herein, provided, however, except as set forth in Section 10(b) or (c), no termination of this Facility Sublease shall occur until all the Bonds and all other indebtedness incurred by the Board for the Project, if any, have been fully repaid.

SECTION 4. Consideration and Conflict between Documents. The Department makes this Facility Sublease in consideration for the public benefit to the State provided by the Project and for undertaking of the financial obligations required under this Facility Sublease. This Facility Sublease is subject to the terms of the Ground Lease, Site Lease and Facility Lease and in the event of a conflict between this Facility Sublease and any of the Ground Lease, Site Lease or the Facility Lease, the provisions of the Ground Lease, Site Lease or the Facility Lease, as the case may be, shall control.

SECTION 5. Purpose and Use. The Site shall be used by the Participating County for the purpose of staffing, operating and maintaining the Project and appurtenances related thereto, in order to provide the Project and for such other purposes as may be ancillary and related thereto for state and local criminal justice agencies. The Participating County shall be required to obtain the concurrence from the Department and the Board for the change in use of the Facility, or any part thereof, or expansion of the Facility.

SECTION 6. Obligations of Participating County.

(a) Maintenance, Repair, Replacement and Utilities. The Participating County shall, at its own cost and expense, pay for all maintenance and repair, both ordinary and extraordinary, of the Facility. The Participating County shall at all times maintain, or otherwise arrange for the maintenance of, the Facility in good condition, and the Participating County shall pay for, or otherwise arrange for, the payment of all utility services supplied to the Facility, and shall pay for, or otherwise arrange for, the payment of the costs of the repair and replacement of the Facility resulting from ordinary or extraordinary wear and tear or want of care on the part of the Participating County or any other cause (except for a catastrophic uninsured loss), and shall pay for, or otherwise arrange for, the payment of any insurance policies, except those provided by the Department pursuant to the Facility Lease.

(b) Rent. The Department shall pay all Base Rental and Additional Rental as required under the Facility Lease. The Participating County shall pay upon the order of the Department or the Board as rent hereunder such amounts, if any, in each year as shall be required by the Department or Board for the payment of all applicable taxes and assessments of any type or nature assessed or levied by any governmental agency or entity having power to levy taxes or assessments charged to the Department, the Board or the State Treasurer affecting or relating to the Facility or their respective interests or estates therein. Except for the Base Rental and Additional Rental obligations and insurance obligations as specified in the Facility Lease, the Department shall have no duty under this Facility Sublease to pay for any other costs to maintain and operate the Facility. The rent required under this section 6(b) shall be abated proportionately during any period in which the Department's obligation to pay rent under the Facility Lease shall be abated.

The Participating County shall submit to the Department within 15 Business Days of the adoption of the Participating County's Budget each year, a copy of its approved and authorized budget that details the amounts allocated to maintain and operate the Facility, including any reserves. The Participating County shall further submit to the Department by the above referenced date, a copy of the relevant portion of the approved and authorized budgets of each sublessee with respect to the Facility, if any, evidencing the respective sublessee's allocation of funds to maintain and operate its portion of the Facility. On September 1 of each year during the term of this Facility Sublease, the Department shall submit a report to the Board including a summary of the information provided by the Participating County as set forth in this paragraph. This report shall be in a form approved by the Board and shall incorporate any other summary to be provided by the Department pursuant to the terms of any facility sublease entered into by the Department in connection with facilities constructed pursuant to the Law, as applicable.

SECTION 7. Insurance.

(a) Insurance Obligations of the Department. The Department will pay or cause to be paid the cost of all insurance required to be maintained under the Facility Lease. The Participating County will not be required to pay or reimburse the Department or any other State of California agency for these insurance costs or any deductible paid by the State. The

Department will provide, or cause to be provided, proof of insurance coverage to the Participating County.

In the event of (i) damage or destruction of the Facility caused by the perils covered by the insurance required under the Facility Lease and (ii) if the Board elects, under the terms of the Facility Lease and the Indenture, to redeem the outstanding Bonds, and (iii) if any insurance proceeds remain after the Bonds have been redeemed and such remaining proceeds are not needed under the terms of the Indenture, and (iv) such funds are distributed to the Department, then the Department agrees to distribute such funds to the Participating County.

The Department will not insure the Participating County's equipment, stored goods, other personal property, fixtures, or tenant improvements, nor such personal property owned by Participating County's, subtenants or assigns, if any, or invitees. The Department shall not be required to repair any injury or damage to any personal property or trade fixtures installed in the Facility by the Participating County caused by fire or other casualty, or to replace any such personal property or trade fixtures. The Participating County may, at its sole option and expense, obtain physical damage insurance covering their equipment, stored goods, other personal property, fixtures or tenant improvement or obtain business interruption insurance.

The Participating County and its boards, officers, agents and employees shall be named as additional insureds on the above insurance. To the extent permitted by law, the Department and the Participating County agree to release the other and waive their rights of recovery against the other for damage to the Facility or their respective property at the Facility arising from perils insured under any commercial property insurance listed in this Facility Sublease or the Facility Lease. The property insurance policies of the Department and the Participating County shall contain a waiver of subrogation endorsement in favor of the other.

(b) Insurance Obligations of the Participating County. The Participating County, at its own cost and expense, shall secure and maintain or cause to be secured and maintained from an insurance company or companies approved to do business in the State of California and maintain during the entire term of this Facility Sublease, the following insurance coverage for the Facility:

(1) General liability insurance in an amount not less than one million Dollars (\$1,000,000) per occurrence. Evidence of such insurance shall be on a General Liability Special Endorsement form and should provide coverage for premises and operations, contractual, personal injury and fire legal liability;

(2) By signing this Facility Sublease, the Participating County hereby certifies that it is aware of the provisions of Section 3700, *et seq.*, of the California Labor Code which require every employer to be insured against liability for Workers' Compensation or to undertake self-insurance in accordance with the provisions of that Code, and that it will comply, and it will cause its subtenants and assignees to comply, with such provisions at all such times as they may apply during the term of this Facility Sublease.

(c) Additional Insureds. The Participating County agrees that the Department and the Board and their officers, agents and employees shall be included as additional insured in all insurance required herein.

(d) Insurance Certificate. The Participating County shall submit or cause to be submitted to the Department, by no later than June 30th of each year, a certificate of insurance or other evidence of insurance in a form satisfactory to the Department.

(e) Self-Insurance. Notwithstanding any other provision of this Section, the Participating County may satisfy the insurance obligations hereunder by a combination of commercial insurance, formal risk pooling under California statutory provisions, and/or a self-funded loss reserve in whatever proportions are deemed appropriate by the Participating County. The Participating County shall furnish the Department and the Board with a certificate or other written evidence of the Participating County's election to provide or cause to be provided all or part of its coverage under a risk pooling, risk retention, or self-insurance program or any combination thereof.

SECTION 8. Assignment or Subletting of Facility.

(a) The Participating County and the Department hereby covenant and agree that neither this Facility Sublease nor any interest of either party in this Facility Sublease shall be sold, mortgaged, pledged, assigned, or transferred by either party by voluntary act or by operation of law or otherwise; provided, however, under certain circumstances, the Facility may be subleased in whole or in part by the Participating County. The Participating County shall not sublet or assign any portion of the Facility, or permit its subtenants to sublet or assign portions of the Facility, without obtaining the prior written consent and approval of the Department and the Board to the form and substance of such sublease, the sublessee and, provided further that, any such sublease shall be subject to the following conditions:

(1) Any sublease of the Facility by the Participating County shall explicitly provide that such sublease is subject to all rights of the Department and the Board under the Facility Sublease, including, the right to re-enter and re-let the Facility or terminate such lease upon a default by the Participating County; and

(2) At the request of the Department or the Board, the Participating County shall furnish the Department, the Board and the State Treasurer with an opinion of nationally recognized bond counsel acceptable to the Board to the effect that such sublease will not, in and of itself, cause the interest on the Bonds to be included in gross income for federal income tax purposes.

(b) The Participating County acknowledges that if the Department breaches the terms of the Facility Lease a remedy for such breach available to the Board under the Facility Lease is to enter and re-let the Facility to an entity other than the Department. If the Board, at its discretion, chooses to exercise this remedy, the Board agrees its first offer to relet the Facility, the terms of such offer to be at the sole reasonable discretion of the Board, shall be made to the Participating County.

- (c) This CDCR Facility Sublease shall not be subordinated.

SECTION 9. Hazardous Materials. The Participating County shall fully disclose in writing to the Department and the Board the existence, extent and nature of any Hazardous Materials, substances, wastes or other environmentally regulated substances, of which the Participating County has actual knowledge relative to the Project. The Participating County further warrants, covenants and represents that it will promptly notify the Department and the Board in writing of any change in the nature or extent of any Hazardous Materials, substances or wastes maintained on, in, around or under the Project or used in connection therewith, of which the Participating County gains actual knowledge, and will transmit to the Agencies and the Trustee copies of any citations, orders, notices or other material governmental or other communication received by the Participating County with respect to any other Hazardous Materials, substances, wastes or other environmentally regulated substances affecting the Project. The Participating County shall ensure (as to itself), and shall use its best efforts to ensure (as to its contractors, consultants and other agents), that all activities of the Participating County or any officers, employees, contractors, consultants, or any other agents of the Participating County performed at the Facility will be in full compliance with all federal, state and local environmental laws, regulations, and ordinances, and further agrees that neither the Participating County nor its contractors, consultants, agents, officers or employees will engage in any management of solid or hazardous wastes at the Project in violation of any Environmental Law. If the presence of Hazardous Materials on the Project results in the contamination or deterioration of the Project or any water or soil beneath the Project, the Participating County shall promptly take all action necessary to investigate and remedy that contamination.

The Participating County shall defend, indemnify and hold the Department and the Board harmless from and against any and all damages, penalties, fines, claims, liens, suits, liabilities, costs (including clean up costs), judgments and expenses (including attorneys', consultants', or experts' fees and expenses of every kind and nature) suffered by or asserted against the Department or the Board as a direct or indirect result of any warranty or representation made by the Participating County in the preceding paragraph being false or untrue in any material respect or the breach of any obligation of the Participating County in the preceding paragraph. The indemnification obligations set forth in this paragraph shall survive any termination of this Facility Sublease.

"Hazardous Materials" means any substance, material, or waste which is or becomes, prior to the date of execution and delivery hereof, regulated by any local governmental authority, the State of California, or the United States Government, including, but not limited to, any material or substance which is (i) defined as a "hazardous substance", "hazardous material", "toxic substance", "solid waste", "pollutant or contaminant", "hazardous waste", "extremely hazardous waste", or "restricted hazardous waste" under the Comprehensive Environmental Response, Compensation and Liability Act of 1980 ("CERCLA") [42 U.S.C.A §§ 9601 et seq.]; the Resource Conservation and Recovery Act of 1976 ("RCRA") [42 U.S.C.A §§ 6901 et seq.]; the Clean Water Act, also known as the Federal Water Pollution Control Act ("FWPCA") [33 U.S.C.A §§ 1251 et seq.]; the Toxic Substances Control Act ("TSCA") [15 U.S.C.A §§ 2601 et seq.]; the Federal Insecticide, Fungicide, Rodenticide Act [7 U.S.C.A §§ 136 et seq.]; the Superfund Amendments and Reauthorization Act [42 U.S.C.A §§ 9601 et seq.]; the Clean Air

Act [42 U.S.C.A §§ 7401 et seq.]; the Safe Drinking Water Act [42 U.S.C.A §§ 300f et seq.]; the Solid Waste Disposal Act [42 U.S.C.A §§ 6901 et seq.]; the Surface Mining Control and Reclamation Act [30 U.S.C.A §§ 1201 et seq.]; the Emergency Planning and Community Right-to-Know Act [42 U.S.C.A §§ 11001 et seq.]; the Occupational Safety and Health Act [29 U.S.C.A §§ 655 and 657]; the California Underground Storage of Hazardous Substances Act [Health & Saf. Code §§ 25280 et seq.]; the California Hazardous Substances Account Act [Health & Saf. Code §§ 25300 et seq.]; the California Hazardous Waste Control Act [Health & Saf. Code §§ 25100 et seq.]; the California Safe Drinking Water and Toxic Enforcement Act [Health & Saf. Code §§ 25249.5 et seq.]; the Porter-Cologne Water Quality Act [Wat. Code §§ 13000 et seq.], including without limitation, Sections 25115, 25117 or 25122.7 of the California Health and Safety Code, or listed pursuant to Section 25140 of the California Health and Safety Code, Division 20, Chapter 6.5 (Hazardous Waste Control Law), (ii) defined as "hazardous substance" under Section 25316 of the California Health and Safety Code, Division 20, Chapter 6.8 (Carpenter-Presley-Talmer Hazardous Substance Account Act), (iii) defined as a "hazardous material", "hazardous substance", or "hazardous waste" under Section 25501 of the California Health and Safety Code.

“Environmental Laws” means any federal, state or local law, statute, code, ordinance, regulation, requirement or rule relating to Hazardous Materials to which the Participating County or the Facility is subject, including all those laws referenced above in the definition of Hazardous Materials.

SECTION 10. Termination, Breach, Default and Damages.

(a) This Facility Sublease shall terminate upon the occurrence of the expiration of the lease term as set forth in Section 3.

(b) If the Participating County shall fail to keep, observe or perform any term, covenant or condition contained herein to be kept or performed by the Participating County for a period of sixty (60) days after notice of the same has been given to the Participating County by the Department or the Board or for such additional time as is reasonably required, in the sole discretion of the Department, with the consent of the Board, to correct any of the same, the Participating County shall be deemed to be in default hereunder and it shall be lawful for the Department to exercise any and all remedies available pursuant to law or granted pursuant to this Facility Sublease. Upon any such default, the Department, in addition to all other rights and remedies it may have at law, shall, with the consent of the Board, have the option to do any of the following:

(1) To terminate this Facility Sublease in the manner hereinafter provided on account of default by the Participating County, notwithstanding any re-entry or re-letting of the Facility as hereinafter provided for in subparagraph (2) hereof, and to re-enter the Facility and remove all persons in possession thereof and all personal property whatsoever situated upon the Facility and place such personal property in storage in any warehouse or other suitable place. In the event of such termination, the Participating County agrees to immediately surrender possession of the Facility, without let or hindrance, and to pay the Department and the Board all damages recoverable at law that the

Department may incur by reason of default by the Participating County, including, without limitation, any costs, loss or damage whatsoever arising out of, in connection with, or incident to any such re-entry upon the Facility and removal and storage of such property by the Department or its duly authorized agents in accordance with the provisions herein contained. Neither notice to deliver up possession of the Facility given pursuant to law nor any entry or re-entry by the Department nor any proceeding in unlawful detainer, or otherwise, brought by the Department for the purpose of effecting such re-entry or obtaining possession of the Facility, nor the appointment of a receiver upon initiative of the Department to protect the Board's interest under the Facility Lease shall of itself operate to terminate this Facility Sublease, and no termination of this Facility Sublease on account of default by the Participating County shall be or become effective by operation of law or acts of the parties hereto, or otherwise, unless and until the Department shall have given written notice to the Participating County of the election on the part of the Department to terminate this Facility Sublease. The Participating County covenants and agrees that no surrender of the Facility or of the remainder of the term hereof or any termination of this Facility Sublease shall be valid in any manner or for any purpose whatsoever unless stated or accepted by the Department by such written notice.

(2) Without terminating this lease, (i) to enforce any term or provision to be kept or performed by the Participating County or (ii) to exercise any and all rights of entry and re-entry upon the Facility. In the event the Department does not elect to terminate this Facility Sublease in the manner provided for in subparagraph (1) hereof, the Participating County shall remain liable and agrees to keep or perform all covenants and conditions herein contained to be kept or performed by the Participating County, and notwithstanding any entry or re-entry by the Department or suit in unlawful detainer, or otherwise, brought by the Department for the purpose of effecting a re-entry or obtaining possession of the Facility. Should the Department elect to re-enter as herein provided, the Participating County hereby irrevocably appoints the Department as the agent and attorney-in-fact of the Participating County to re-let the Facility, or any part thereof, from time to time, either in the Department's name or otherwise, upon such terms and conditions and for such use and period as the Department may deem advisable and to remove all persons in possession thereof and all personal property whatsoever situated upon the Facility and to place such personal property in storage in any warehouse or other suitable place, for the account of and at the expense of the Participating County, and the Participating County hereby exempts and agrees to save harmless the Department from any costs, loss or damage whatsoever arising out of, in connection with, or incident to any such re-entry upon and re-letting of the Facility and removal and storage of such property by the Department or its duly authorized agents in accordance with the provisions herein contained except for any such costs, loss or damage resulting from the intentional or negligent actions of the Department or its agents. The Participating County agrees that the terms of this Facility Sublease constitute full and sufficient notice of the right of the Department to re-let the Facility in the

event of such re-entry without effecting a surrender of this Facility Sublease. The Participating County further agrees that no acts of the Department in effecting such re-letting shall constitute a surrender or termination of this Facility Sublease irrespective of the use or the term for which such re-letting is made or the terms and conditions of such re-letting, or otherwise, but that, on the contrary, in the event of such default by the Participating County the right to terminate this Facility Sublease shall vest in the Department to be effected in the sole and exclusive manner provided for in subparagraph (1) hereof. The Participating County further agrees to pay the Department the cost of any alterations or additions to the Facility necessary to place the Facility in condition for re-letting immediately upon notice to the Participating County of the completion and installation of such additions or alterations.

(c) This Facility Sublease may be terminated at the option of the Board if the Board determines to exercise its right to enter and re-let the Facility under the Facility Lease pursuant to a default by the Department thereunder.

(d) In addition to any default resulting from breach by the Participating County of any term or covenant of this Facility Sublease, if (1) the Participating County's interest in this Facility Sublease or any part thereof be assigned, sublet or transferred without the prior written consent to the Department and the Board, either voluntarily or by operation of law, or (2) the Participating County or any assignee shall file any petition or institute any proceedings under any act or acts, state or federal, dealing with or relating to the subject of bankruptcy or insolvency or under any amendment of such act or acts, either as a bankrupt or as an insolvent or as a debtor or in any similar capacity, wherein or whereby the Participating County asks or seeks or prays to be adjudicated as bankrupt, or is to be discharged from any or all of the Participating County's debts or obligations, or offers to the Participating County's creditors to effect a composition or extension of time to pay the Participating County's debts, or asks, seeks or prays for a reorganization or to effect a plan of reorganization or for a readjustment of the Participating County's debts or for any other similar relief, or if any such petition or if any such proceedings of the same or similar kind or character be filed or be instituted or taken against the Participating County, or if a receiver of the business or of the property or assets of the Participating County shall be appointed by any court, except a receiver appointed at the insistence or request of the Department or the Board, or if the Participating County shall make a general or any assignment for the benefit of the Participating County's creditors, or (3) the Participating County shall abandon the Facility, then the Participating County shall be deemed to be in default hereunder.

(e) The Department shall in no event be in default in the performance of any of its obligations hereunder unless and until the Department shall have failed to perform such obligations within sixty (60) days or such additional time as is reasonably required to correct any such default after notice by the Participating County to the Department that the Department has failed to perform any such obligation.

(f) The Participating County hereby waives any and all claims for damages caused or which may be caused by the Department in re-entering and taking possession of the Facility as herein provided and all claims for damages that may result from the destruction of or

injury to the Facility and all claims for damages to or loss of any property belonging to the Department, or any other person, that may be in or upon the Facility, except for such claims resulting from the intentional or negligent actions of the Department or its agents.

Each and all of the remedies given to the Department hereunder or by any law now or hereafter enacted are cumulative and the single or partial exercise of any right, power or privilege hereunder shall not impair the right of the Department to other or further exercise thereof or the exercise of any or all other rights, powers or privileges. The term “re-let” or “re-letting” as used in this Section shall include, but not be limited to, re-letting by means of the operation or other utilization by the Department of the Facility. If any statute or rule of law validly shall limit the remedies given to the Department hereunder, the Department nevertheless shall be entitled to whatever remedies are allowable under any statute or rule of law.

In the event the Department shall prevail in any action brought to enforce any of the terms and provisions of this Facility Sublease, the Participating County agrees to pay reasonable attorney’s fees incurred by the Department in attempting to enforce any of the remedies available to the Department hereunder; whether or not a lawsuit has been filed and whether or not any lawsuit culminates in a judgment.

SECTION 11. Additions, Betterments, Extensions or Improvements; Liens. If any proposed additions, betterments, extensions or improvements of the Facility require approval by the Corrections Standards Authority, the Participating County shall concurrently with the request for such approval(s) request the approval to such additions, betterments, extensions or improvements of the Board. The Participating County acknowledges the commencement of such additions, betterments, extensions or improvements shall be subject to receipt by the Participating County of the Board’s approval thereto. In the event the Participating County shall at any time during the term of this Facility Sublease cause any additions, betterments, extensions or improvements to the Facility to be acquired or constructed or materials to be supplied in or upon the Facility, the Participating County shall pay or cause to be paid when due all sums of money that may become due, or purporting to be due for any labor, services, materials, supplies or equipment furnished or alleged to have been furnished to or for the Participating County in, upon or about the Facility and shall keep the Facility free of any and all mechanics’ or materialmen’s liens or other liens against the Facility or the Department’s or the Board’s interest therein. In the event any such lien attaches to or is filed against the Facility or the Department’s or the Board’s interest therein, the Participating County shall cause each such lien to be fully discharged and released at the time the performance of any obligation secured by any such lien matures or becomes due, except that if the Participating County desires to contest any such lien it may do so. If any such lien shall be reduced to final judgment and such judgment or such process as may be issued for the enforcement thereof is not promptly stayed, or if so stayed and said stay thereafter expires, the Participating County shall forthwith pay or cause to be paid and discharged such judgment. In accordance with Section 20, the Participating County agrees to and shall, to the maximum extent permitted by law, defend, indemnify and hold the Department, the Board, the State Treasurer and their members, directors, agents, successors and assigns harmless from and against and defend each of them against any claim, demand, loss, damage, liability or expense (including attorneys’ fees) as a result of any such lien or claim of lien against the Facility or the Department’s or the Board’s interest therein. The Participating County hereby

acknowledges and agrees that it shall not cause any additions, betterments, extensions or improvements to the Facility to occur in such a manner that Rental under the Facility Lease would be abated.

The Department covenants that the Project is not and will not be mortgaged, pledged, or hypothecated by the Department in any manner or for any purpose and that the Project has not been and will not be the subject of a security interest by the Department. In addition, the Department covenants that the Project is not and will not be mortgaged, pledged, or hypothecated for the benefit of the Participating County or its creditors in any manner or for any purpose and that the Project has not been and will not be the subject of a grant of a security interest in favor of the Participating County or its creditors. The Department shall not in any manner impair, impede, or challenge the security, rights and benefits of the owners of the Bonds or the trustee for the Bonds.

SECTION 12. Continuing Disclosure. The Participating County hereby covenants and agrees that it will fully cooperate with the Department, the Board and the State Treasurer so that they can comply with and carry out all of the provisions of the Continuing Disclosure Agreement and will provide all information reasonably requested by the Department, the Board or the State Treasurer regarding the Facility, in connection with continuing disclosure obligations.

SECTION 13. Status of Private Activity Use of the Facility. The Participating County hereby covenants and agrees to provide information to the Department, the Board and the State Treasurer annually regarding the private activity use, if any, of the Facility. Any such private use must be consistent with the Participating County's covenants pursuant to Section 14 hereof. The information that must be updated annually is set forth in the Tax Certificate that was executed and delivered by the Board upon the initial issuance of the Bonds.

SECTION 14. Tax Covenants. The Participating County covenants that it will not use or permit any use of the Facility, and shall not take or permit to be taken any other action or actions, which would cause any Bond to be a "private activity bond" within the meaning of Section 141 of the Internal Revenue Code of 1986, as amended; and any applicable regulations promulgated from time to time thereunder. The Participating County further covenants that it will not take any action or fail to take any action, if such action or the failure to take such action would adversely affect the exclusion from gross income for federal income tax purposes of interest on the Bonds.

The Participating County does not expect to and shall not perform any act, enter into any agreement, or use or permit more than 10% of the Bond proceeds or the Project to be used in any trade or business unrelated to the exempt purposes of the Participating County (as defined in Section 513(a) of the Code), or enter into any contract or arrangement with any person or organization (other than a state or local governmental unit, or a 501(c)(3) organization acting within the scope of its exempt purposes), including the federal government (a "Disqualified Person"), which provides for use of more than 10% of the Project in any trade or business of such Disqualified Person ("Private Use"), including a lease or sale of any part of the Project excluding general public use and other uses disregarded under Treasury Regulation §1.141-3, unless the Participating County provides prior written notice to the Board of the proposed act,

agreement or use and the Participating County and the Issuer receive an opinion of nationally recognized bond counsel acceptable to the Board with respect to such act, agreement or use.

The Participating County will not enter into any arrangement with any Disqualified Person which provides for such person to manage, operate, or provide services with respect to the Project (or any portion thereof) (a "Service Contract"), unless the guidelines set forth in Revenue Procedure 97-13, as modified by Revenue Procedure 2001-39 (the "Guidelines"), are satisfied, except to the extent the Participating County obtains a private letter ruling from the Internal Revenue Service or an opinion of nationally recognized bond counsel acceptable to the Board which allows for a variation from the Guidelines.

The Participating County will not enter into any contract or arrangement with any Disqualified Person which provides for use of the Project (or any portion thereof) for "research," within the meaning of Treasury Regulations Section 1.141-3(b)(6), for the benefit of such Disqualified Person unless such contract or arrangement meets the requirements of Rev. Proc. 2007-47. For this purpose, "research" includes activities that represent research in the experimental or laboratory sense. The term generally includes all activities incident to the development or improvement of a product, including obtaining a patent. "Research" for this purpose does not include management studies. However, contracts or arrangements with a Disqualified Person for management studies may result in private trade or business use if the Disqualified Person has possessory or priority rights in specific portions of the Project.

SECTION 15. No Merger. The parties hereto intend that there shall be no merger of any estate or interest created by this Facility Lease with any other estate or interest in the Facility, or any part thereof, by reason of the fact that the same party may acquire or hold all or any part of the estate or interest in the Facility created by this Facility Lease as well as another estate or interest in the Facility.

SECTION 16. Waste. The Participating County shall not commit, suffer, or permit any waste or nuisance on or within the Facility or any acts to be done thereon in violation of any laws or ordinances.

SECTION 17. Amendments. This Facility Sublease may not be amended, changed, modified or altered without the prior written consent of the parties hereto and the Board.

SECTION 18. Waiver.

The waiver by the Department, any such waiver subject to the consent thereto of the Board, of any breach by the Participating County of any agreement, covenant or condition hereof shall not operate as a waiver of any subsequent breach of the same or any other agreement, covenant or condition hereof.

The waiver by the Participating County, any such waiver subject to the consent thereto of the Board, of any breach by the Department of any agreement, covenant or condition hereof shall not operate as a waiver of any subsequent breach of the same or any other agreement, covenant or condition hereof.

SECTION 19. Non-Liability of the Department and other State Entities. Any obligation of the Department created by or arising out of this Facility Sublease shall not impose a debt or pecuniary liability upon the Department, the Board or the State of California, or a charge upon the general credit or taxing powers thereof, but shall be payable solely out of funds duly authorized and appropriated by the State.

The delivery of this Facility Sublease shall not, directly or indirectly or contingently, obligate the Board, the Department, the State Treasurer or the State of California to levy any form of taxation therefor or to make any appropriation. Nothing herein or in the proceedings of the Participating County, the Board or the Department shall be construed to authorize the creation of a debt of the Board, the Department, the State Treasurer or the State of California, within the meaning of any constitutional or statutory provision of the State of California. No breach of any pledge, obligation or agreement made or incurred in connection herewith may impose any pecuniary liability upon, or any charge upon the general credit of the Board, the Department or the State of California.

SECTION 20. Indemnification.

As required by California Government Code Section 15820.905, the Participating County agrees to indemnify, defend, and hold harmless the State of California, including but not limited to the Department and the Board and their officers, agents and employees, for any and all claims and losses accruing and resulting from or arising out of the Participating County's use and occupancy of the Facility. The Participating County's obligation to indemnify, defend and hold harmless under this Section shall extend to all such claims and losses arising, occurring, alleged, or made at any time, including prior to, during, or after the period that this Facility Sublease is in full force and effect. Notwithstanding the preceding sentence, the Participating County will not be required to indemnify, defend or hold harmless the Department, the Board, or any other State agency, or their respective officers, agents, employees, contractors and/or invitees from any claim which arises, in whole or in part, from the gross negligence or willful misconduct or omission of the Department, the Board, or any other State agency, or their respective officers, agents, employees, contractors and/or invitees. The indemnification obligations of the Participating County set forth in this Section shall survive any termination of this Facility Sublease.

SECTION 21. Law Governing. This Facility Sublease shall be governed exclusively by the provisions hereof and by the laws of the State of California as the same from time to time exist. Any action or proceeding to enforce or interpret any provision of this lease shall, to the extent permitted by law, be brought, commenced or prosecuted in the courts of the State located in the County of Sacramento, California.

SECTION 22. Headings. All section headings contained in this Facility Sublease are for convenience of reference only and are not intended to define or limit the scope of any provision of this Facility Sublease.

SECTION 23. Notices. All approvals, authorizations, consents, demands, designations, notices, offers, requests, statements or other communications hereunder by either party to the other shall be in writing and shall be sufficiently given and served upon the other party if delivered personally or if mailed by United States registered or certified mail, return receipt requested, postage prepaid, and addressed as follows:

To the Department: Department of Corrections and
Rehabilitation of the State of California
Attention: _____
[Address]

To the Board: State Public Works Board

Attn: Administrative Secretary
915 "L" Street, 9th floor
Sacramento, CA 95814

To the State Treasurer: Treasurer of the State of California
Public Finance Division
915 Capitol Mall, Room 280
Sacramento, CA 95814

To the Participating County: [COUNTY] Sheriff
[Address]

Attention: _____

With a copy to:

[Title of Appropriate County Officer],
[Address]

Attention: _____

The address to which notices shall be mailed as aforesaid to any party may be changed by written notice given by such party to the others as hereinabove provided.

SECTION 24. Successors and Assigns. The terms and provisions hereof shall extend to and be binding upon and inure to the benefit of the successors and assigns of the respective parties hereto.

SECTION 25. Validity and Severability. If for any reason this Facility Sublease or any part thereof shall be held by a court of competent jurisdiction to be void, voidable, or unenforceable by the Department or by the Participating County, all of the remaining terms of this Facility Sublease shall nonetheless continue in full force and effect. If for any reason it is held by such a court that any of the covenants and conditions of the Participating County hereunder, including the covenant to pay rentals hereunder, is unenforceable for the full term hereof, then and in such event this Facility Sublease is and shall be deemed to be a lease from year to year under which the rentals are to be paid by the Participating County annually in consideration of the right of the Participating County to possess, occupy and use the Facility, and all the other terms, provisions and conditions of this Facility Sublease, except to the extent that such terms, provisions and conditions are contrary to or inconsistent with such holding, shall remain in full force and effect, to the extent permitted by law.

SECTION 26. Execution. This Facility Sublease may be executed in any number of counterparts, each of which shall be deemed to be an original, but all of which together shall constitute one and the same Facility Sublease. It is also agreed that separate counterparts of this Facility Sublease may separately be executed by the Department, the Participating County and any other signatory hereto, all with the same force and effect as though the same counterpart had been executed by the Department, the Participating County and such other signatory.

SECTION 27. Multiple Originals. This Facility Sublease may be executed in any number of originals, each of which shall be deemed to be an original.

SECTION 28. Net Lease. This Facility Sublease shall be deemed and construed to be a “net lease” and the Participating County hereby agrees that the rentals provided for herein shall be an absolute net return to the Department, free and clear of any expenses, charges or set-offs whatsoever.

IN WITNESS WHEREOF, this Facility Sublease has been executed by the parties hereto as of the ____ day of _____, 20__.

DEPARTMENT OF CORRECTIONS AND REHABILITATION OF THE STATE OF CALIFORNIA

By _____
[Name]
[Title]

COUNTY OF [COUNTY]

By _____
[Name]
[Title]

APPROVED AS TO FORM:

[NAME]
County Counsel

By _____
[Name]
[Title]

CONSENT AND ACKNOWLEDGEMENT OF THE BOARD PURSUANT TO SECTION 8(b) OF THE FACILITY LEASE:

STATE PUBLIC WORKS BOARD OF THE STATE OF CALIFORNIA

By _____
[Name]
[Title]

APPROVED (Pursuant to Government Code section 11005.2):

DEPARTMENT OF GENERAL SERVICES OF THE STATE OF CALIFORNIA

By _____
[Name]
[Title]

EXHIBIT A

LEGAL DESCRIPTION OF SITE

FORM OF DOCUMENT

Final Environmental Impact Report

Response to Comments, Mitigation Monitoring and Reporting Program, and Revisions, Clarifications, and Corrections to the Draft EIR

**County of Los Angeles
Mira Loma Women's Detention Center Project
City of Lancaster, California**

SCH No. 2014091012

Volume 1

Prepared for | County of Los Angeles Chief Executive Office
Capital Projects/Debt Management Division
754 Kenneth Hahn Hall of Administration
500 West Temple Street
Los Angeles, California 90012

Prepared by | BonTerra Psomas
225 South Lake Avenue, Suite 1000
Pasadena, California 91101
T: (626) 351-2000 F: (626) 351-2030

September 2016



TABLE OF CONTENTS

<u>Section</u>	<u>Page</u>
<u>Volume 1</u>	
Section 1.0 Introduction	1
1.1 The California Environmental Quality Act and Public Review of the Draft Environmental Impact Report	1
1.2 Project Description.....	4
1.2.1 <i>Project Location and Setting</i>	4
1.2.2 <i>Project Description</i>	5
1.3 Summary of Environmental Impacts.....	6
Section 2.0 Responses to Comments	7
2.1 State, Regional, and Local Agencies.....	8
2.1.1 <i>Antelope Valley Air Quality Management District (AVAQMD)</i>	9
2.1.2 <i>Los Angeles County Fire Department (LACFD)</i>	10
2.1.3 <i>Los Angeles County Sanitation Districts (Districts)</i>	11
2.1.4 <i>State of California Clearinghouse and Planning Unit (SCH)</i>	13
2.1.5 <i>State of California Clearinghouse and Planning Unit (SCH)</i>	14
2.2 Organizations.....	15
2.2.1 <i>Antelope Valley Rural Museum (AVRM)</i>	16
2.2.2 <i>Californians United for a Responsible Budget (CURB)</i>	17
2.2.3 <i>Critical Resistance Los Angeles et al. (CRLA)</i>	20
2.2.4 <i>National Day Laborer Organizing Network (NDLON)</i>	64
2.2.5 <i>National Immigration Law Center (NILC)</i>	67
2.2.6 <i>Weingart</i>	70
2.2.7 <i>Women of Color in the Global Women's Strike (WOC)</i>	102
<u>Volume 2</u>	
2.3 Individuals.....	110
2.3.1 <i>Form Letter</i>	113
2.3.2 <i>Individualized Introductions to Form Letters</i>	122
<u>Volume 3</u>	
2.3.3 <i>Individual Comment Letters</i>	215
Section 3.0 Mitigation Monitoring and Reporting Program.....	389
Section 4.0 Revisions, Clarifications, and Corrections on the Draft EIR.....	411
Section 5.0 References	417

TABLES

<u>Table</u>	<u>Page</u>
3-1 Mitigation Monitoring and Reporting Program.....	390
4-1 Jail Plan Report Summary of Options	415

APPENDICES

Appendices

- A Form Letters
- B Cultural Resources Records Search
- C San Manuel Band of Mission Indians Response to the Project
- D Limited Asbestos and Lead-Based Paint Sampling Report - Buildings 27, 28, 29, 32 and 40
- E California Environmental Reporting System (CERS) database and Monitoring System Certification
- F Supplemental Phase II ESA Soil Sampling Report

SECTION 1.0 INTRODUCTION

Pursuant to the California Environmental Quality Act (CEQA), the potential environmental effects of the proposed Mira Loma Women's Detention Center Project (hereinafter referred to as the "Project") have been analyzed in a Draft Environmental Impact Report (Draft EIR) (SCH No. 2014091012) dated November 2015. This document contains the Final Environmental Impact Report (FEIR) for the Lead Agency – the County of Los Angeles (County):

Section 15132 of the State CEQA Guidelines lists the contents of the Final EIR:

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

The purpose of the Final EIR is to respond to all comments received by the County regarding the environmental information and analyses contained in the Draft EIR. Additionally, any clarifications/corrections to the text, tables, figures, and appendices of the Draft EIR generated either from responses to comments or independently by the County are stated in the Final EIR in Section 4.0. The Draft EIR text has not been modified to reflect these clarifications.

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

Section 15097 of the State CEQA Guidelines states that the lead agency shall adopt a program for monitoring or reporting on the revisions that it has required for the project and the measures it has imposed to mitigate or avoid significant environmental effects. Section 3.0, Mitigation Monitoring and Reporting Program (MMRP), describes the mitigation program to be implemented by the County for the proposed Mira Loma Women's Detention Center Project.

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

Upon completion of the Draft EIR, notice of the public review period was given in accordance with Section 15087 of the State CEQA Guidelines. In November 2015, a *Notice of Availability (NOA) of the Draft Environmental Impact Report and Notice of Public Meeting* was prepared and distributed to the State Office of Planning and Research, Los Angeles County Clerk, responsible and trustee agencies, organizations, interested parties, and all parties who requested a copy of the EIR in accordance with CEQA. The County decided to provide a voluntary extension beyond the CEQA-mandated 45-day public review period to account for the holiday season and to provide ample opportunity and time for the public to review the Draft EIR. Thus, comments on the Draft EIR were accepted during a 64-day public review period extending from Monday, November 9, 2015 through Tuesday, January 12, 2016.

The NOA was distributed to the mailing list and email list prepared for the Notice of Preparation (NOP) for the scoping stage of the proposed Project before issuance of the Draft EIR, and was

augmented to include property owners within a 300-foot radius of the Project site, individuals requested to be added to the list, as well as individuals who had provided comments on the NOP. The NOA and Draft EIR were posted on the County's website for viewing and downloading at <ftp://dpwftp.co.la.ca.us/pub/PMD/MiraLomaWomenFacility>. Newspaper advertisements of the NOA and Draft EIR comment period and the information on a public meeting were placed in the following papers and ran on Monday, November 9, 2015:

- *Acton-Aqua Dolce News*: a weekly publication so the ad was available for 7 days.
- *Los Angeles Daily News*: a daily publication
- *Antelope Valley Press*: a daily publication
- *Antelope Valley Times*: an online publication

Hardcopies of the Draft EIR were available for public viewing at the following locations:

Quartz Hill Library
42018 North 50th Street
West
Quartz Hill, California 93536

Lancaster Library
601 West Lancaster
Boulevard
Lancaster, California 93534

Public Information Office
358 Kenneth Hahn Hall of
Administration
500 West Temple Street
Los Angeles, California 90012

The first of two public meetings was held to provide an overview of the Project and the conclusions of the Draft EIR and information on the comment process and to invite submission of public comments on the Draft EIR on Tuesday, December 8, 2015, from 6:00 PM to 8:00 PM at the James C. Gilley Lancaster National Soccer Center Eastside Activity Center, which is located at 43000 30th Street East in Lancaster, CA 93535. There were approximately 15 attendees at the first public meeting, and some submitted written comments. The notice for this meeting stated that attendance at this public meeting was voluntary and not required in order to submit comments on the Draft EIR.

Subsequently, in January 2016, in response to requests from the public to provide an additional extension of the public review period and an additional public meeting, a *Notice of Extended Comment Period for the Draft Environmental Impact Report for the Mira Loma Women's Detention Center Project and Notice of Second Public Meeting in Lancaster, California* (Notice) was sent to the 2015 NOA mailing list and email list, as well as additional mailing list contacts that had provided comment letters during the Draft EIR public review period up to the time of the mailing. This Notice extended the Draft EIR public review period from Monday, February 1, 2016, through Wednesday, March 2, 2016. This 30-day extension was in addition to the original 64-day Draft EIR public review period. All written comments received on the Draft EIR from Monday, November 9, 2015, through Wednesday, March 2, 2016, are responded to in this document.

The Notice extending the public review period was provided in both English and Spanish as requested by some members of the public. Additionally, the Executive Summary of the Draft EIR was translated into Spanish and posted on the County's website for viewing and downloading. Hardcopies of the Spanish-translated Executive Summary were made available, in addition to the Draft EIR, at the Quartz Hill and Lancaster Libraries, and the Los Angeles County Public Information Office. Newspaper advertisements of the extended comment period and second public meeting were placed in the following papers and ran on Monday, February 1, 2016:

- *Acton-Aqua Dolce News*: a weekly publication (the ad was available for 7 days)
- *Los Angeles Daily News*: a daily publication

- *La Opinion*: a daily publication (the ad was in both English and Spanish)
- *Antelope Valley Press*: a daily publication
- *Antelope Valley Times*: an online publication

The second public meeting was held on Tuesday, February 9, 2016, at the Lancaster Public Library at 601 West Lancaster Boulevard in Lancaster, CA 93534 to provide an overview of the Project, the conclusions of the Draft EIR, and information on the comment process, and to invite submission of public comments on the Draft EIR. Real-time Spanish translation services were made available, as also requested by members of the public, as were copies of the Notice and the Executive Summary in both English and Spanish. This second public meeting had two attendees from the public and neither requested available translation services.

In summary, the County conducted all required noticing and scoping for the proposed Project in accordance with Section 15083 of the State CEQA Guidelines, and conducted the public review for the Draft EIR in compliance with Section 15087 of the State CEQA Guidelines. The two public meetings, as well as the extension of the public review period until March 2, 2016, exceeded the requirements of CEQA.

During the comment period, written comments on the Draft EIR were received by the County of Los Angeles Chief Executive Office. The County has reviewed all comments and has determined that no substantial new environmental issues have been raised and that all issues raised in the comments have been adequately addressed in the Draft EIR and/or in the Responses to Comments, Mitigation Monitoring and Reporting Program, and Clarifications to the Draft EIR. All potential impacts associated with the proposed Project were found to be less than significant with incorporation of relevant mitigation measures, where applicable. Therefore, the EIR concludes that the proposed Project would not result in any significant impacts.

The Final EIR for the proposed Project, dated September 2016, consists of the following documents:

- Draft EIR and Technical Appendices dated November 2015
- Responses to Comments, Mitigation Monitoring and Reporting Program and Revisions, Clarifications, and Corrections to the Draft EIR, which includes:
 - A list of all persons, organizations, and public agencies that commented as well as the verbatim comments received on the Draft EIR;
 - Responses to written comments on the Draft EIR; and
 - Other information beyond the scope of CEQA provided by the County for context and information to the decision makers, agencies and the public

This document includes all public comment letters; the County's responses to comments; and the State Clearinghouse letter that documents compliance with CEQA review requirements.

Next Procedural Steps

The County Board of Supervisors is required to consider and certify a Final EIR only if it exercises its discretion to approve the proposed Project in the future. The Final EIR, and related documents will be filed with the County staff's Project recommendations for Board of Supervisors consideration on a future Board of Supervisors agenda. Consideration of recommendations relating to the proposed Project will be publically noticed as required by state law.

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

The Final EIR document will be posted for viewing and download with the previously posted Draft EIR prior to the County's consideration of the Final EIR and Project recommendations on the same website noted above for the posting of the Draft EIR: <ftp://dpwftp.co.la.ca.us/pub/PMD/MiraLomaWomenFacility>. Hard copies were provided for public viewing at the same locations used for the distribution of the Draft EIR.

1.2 PROJECT DESCRIPTION

1.2.1 PROJECT LOCATION AND SETTING

The Project site is located in northern Los Angeles County in the Antelope Valley in the City of Lancaster, which is approximately 70 miles north of downtown Los Angeles and immediately north of the City of Palmdale. The Project site is located at 45100 60th Street West, on the southeast corner of West Avenue I and 60th Street West. The Project will occupy a 46-acre portion of the existing Mira Loma Detention Center (MLDC) property and facilities, which is currently not occupied by inmates or serving any detention functions.

Primary vehicular access to the Project site is from 60th Street West via West Avenue I, which connects to the north-south Antelope Valley Freeway (State Route [SR] 14). SR-14 provides access to the area's major cities of Lancaster, Palmdale, and Santa Clarita, and the greater Los Angeles area to the south via Interstate (I) 5. The Antelope Valley Line of the Metrolink commuter rail system runs generally parallel to the SR-14 and connects the Antelope Valley cities to Santa Clarita, Newhall, Sylmar, Sun Valley, Burbank, Glendale, and downtown Los Angeles. The Lancaster Metrolink Station is located approximately six miles east of the Project site.

The Project site is located on approximately 355 acres of County-owned property, which includes various facilities, including the MLDC; the former High Desert Health System Multi-Ambulatory Care Center (HDHS MACC); a County-operated solar energy facility; the County Probation Department's Challenger Memorial Youth Center (CMYC); and the County Animal Care and Control – Lancaster Shelter. The Bachelor Officer's Quarters (BOQ) is a part of the MLDC and is located on the west side of 60th Street West, across from the main MLDC property. The northern portion of the block, including the Project site, is owned by the County and is not subject to regulation by the Lancaster General Plan or Zoning Ordinance. Located south of the County-owned property is approximately 262 acres of property owned by the State of California for the California State Prison – Los Angeles County.

The MLDC has been in operation as a detention center since 1945–1946, when the California Youth Authority began to run a vocational school at the site, which focused on job training for juvenile offenders. In the mid-1950s, the MLDC operated as a medium-security facility until it ceased operations for the first time in 1979. It reopened in 1983 and was expanded with the construction of several new buildings in 1986. The facility was repurposed for female inmates and was known as the Mira Loma Female Honor Ranch, but was closed again in 1993. The MLDC reopened for use in 1997 by the U.S. Immigration and Customs Enforcement (ICE) to house undocumented immigrants until their immigration cases were decided, and it operated in that capacity until 2012. The site has not housed inmates since that time.

1.2.2 PROJECT DESCRIPTION

The Project site includes 46 acres of the MLDC property. The Mira Loma Women's Detention Center (MLWDC) Project involves the reuse, renovation, and expansion of the majority of the currently unoccupied MLDC property to provide a total of 1,604 beds for low- to medium-security female inmates. Some buildings will be demolished to accommodate the new site plan, which includes new building and facility construction. The majority of the buildings will be renovated and/or expanded, making use of the majority of the existing buildings and infrastructure on the Project site.

The MLWDC Project will provide detention services within a secured custody setting (e.g., security fencing, guard towers). The Project will include dormitory housing in twinned barracks (896 beds), single barracks (68 beds), new transitional housing (384 beds), and barracks E and F (256 beds), along with facilities for other support services (e.g., administration, visitation, kitchen, inmate processing, laundry, medical, education, recreation, and maintenance). In total, the Project will include approximately 365,210 gross square feet (gsf) of building space.

Of the total outdoor areas proposed on site, approximately 428,000 square feet (sf, i.e., 46.4 percent) will be pervious (e.g., soil or landscaped) and approximately 494,150 sf (53.6 percent) will be paved, including buildings, roadways and sidewalks. Within the secured and fenced property, approximately 63,400 sf will be set aside for outdoor recreational activities and program space that will be accessible to the female inmates (e.g., sports courts and recreation fields, gardens, and courtyards-passive recreational areas).

The Project is designed to deliver a more normative environment than the current detention facilities housing women to assist in the transition of eligible female inmates from detention to release into independent living. To provide for an education-based incarceration, the Project will offer general education classes, computer training, general and vocational career technical education, career counseling, college courses, a learning resource center, culinary classes, and indoor/outdoor recreation for inmates. All facilities will be enclosed within a secured and guarded perimeter fencing.

In order to meet the standards of the Board of State and Community Corrections (BSCC) and long-term occupancy at MLWDC, utility and infrastructure repairs and upgrades will be required to the Project site's water infrastructure; sewer infrastructure; storm drain infrastructure; heating, ventilation, air conditioning (HVAC) system; and electrical facilities. A new water line connection will be required to link the Project site to the Los Angeles County Waterworks District 40 water line within West Avenue I. Water service from the existing on-site water wells and storage tanks will be disconnected.

Upon completion of the Project, low- to medium-security female inmates will be transferred to the Project site from their current detention facility, which is now the Century Regional Detention Facility (CRDF) in Lynwood. The County's remaining female inmate population, who are not in low- to medium-security classifications or who require medical or other services not available at the Project site, will be housed at other jail facilities that have appropriate services to meet their needs.

The Project will be staffed by approximately 523 employees in total, with approximately 225 employees during the AM shift (6:00 AM to 2:00 PM); approximately 177 employees during the PM shift (2:00 PM to 10:00 PM); and approximately 121 employees during the EM shift (10:00 PM to 6:00 AM). This will include Los Angeles Sheriff's Department (Sheriff's Department) security/sworn staff, Sheriff's Department civilian staff, teachers, counselors, maintenance

personnel, physicians, registered nurses, registered nurse practitioners, and other County employees and contractors. A number of community-based volunteers are also anticipated at the site to provide training and assist with visitation.

1.3 SUMMARY OF ENVIRONMENTAL IMPACTS

The Initial Study indicated that the Project will have no impacts on Agriculture and Forest Resources or on Mineral Resources, and that no further analysis in the Draft EIR is required.

The Draft EIR evaluates the environmental impacts associated with Project implementation. The analysis indicates that implementation of the Project Design Features (PDFs) and compliance with Regulatory Requirements (RRs) will result in the Project having no impact or less than significant impacts on Air Quality; Geology and Soils; Greenhouse Gases; Hydrology and Water Quality; Land Use and Planning; Population, Housing, and Employment; Public Services and Recreation; Transportation and Traffic; and Energy.

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

Prior to mitigation, Project implementation will result in potentially significant impacts to Aesthetics, Biological Resources, Cultural Resources, Hazards and Hazardous Materials, Noise, and Utilities and Services Systems. However, mitigation measures (MMs) have been developed to avoid or reduce all of these impacts to levels considered less than significant. No significant unavoidable impacts will occur after mitigation.

SECTION 2.0 RESPONSES TO COMMENTS

Letters commenting on the information and analysis in the Draft EIR were received from various parties during the initial 64-day public review period (i.e., Monday, November 9, 2015 through Tuesday, January 12, 2016). Additional comments were received when the public review period was subsequently extended to March 2, 2016. A total of 295 comment letters were received, including 5 letters from public agencies, 7 letters from organizations, and 283 letters from individuals. Blank self-addressed comment cards were also made available for convenience during the public meetings held on December 8, 2015 and February 9, 2016 in the City of Lancaster.

The County's responses to all comments are provided below. Responses to state, regional, and local agencies are included in Section 2.1; responses to organizations are included in Section 2.2; and responses to individuals that sent comment letters are included in Section 2.3.

Section 2.3 organizes the letters from individuals as follows:

- Section 2.3.1 includes 135 comment letters that were exact duplicates of a sample "form letter", with only the name of the sender being different. These individually submitted form letters are included in Appendix A of this Final EIR. Responses to the comments in the form letter follow a sample of the text of the form letter and are numbered as Form Letter-1, Form Letter-2, and so on to the end of the responses to each comment in that letter.
- Section 2.3.2 includes the responses to 88 form letters that included individualized introductory comments or some other personalized information, as well as the form letter that is responded to in Section 2.3.1. These 88 comment letters are included in this Responses to Comments document, located on the page prior to the response. For these letters, the comments are numbered as Name – 1, Name -2, and so on to the end of each of the individualized comments that were added to the form letter comments. The responses to the form letter portion of these comment letters references but does not repeat the form letter responses, which are located in Section 2.3.1.
- Section 2.3.3 includes 60 other comment letters and comment cards that were received from individuals, and the responses to those comments. Responses to each of these comment letters and cards from individuals are numbered Name-1, Name -2, and so on to the end of the individual responses to each of the comments in these letters and cards.

Each comment letter is provided first and is bracketed in the right margin, sequentially numbered (e.g., AVAQMD-1, AVAQMD-2). Following the bracketed comment letter, the County's responses are presented in corresponding order to provide a matching numbered response on the pages following each comment letter.

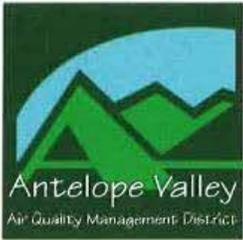
If you submitted comments on this proposed project, you will be able to see your comments and the County's responses in this Final EIR. In addition, you may be interested in the comments that others have submitted and the responses to those comments.

2.1 **STATE, REGIONAL, AND LOCAL AGENCIES**

Comment letters from state, regional, and local agencies include:

- Antelope Valley Air Quality Management District, December 7, 2015
- Los Angeles County Fire Department (LACFD), November 23, 2015
- Los Angeles County Sanitation Districts (Districts), January 11, 2016/February 8, 2016
- State of California, State Clearinghouse and Planning Unit, January 28, 2016
- State of California, State Clearinghouse and Planning Unit, March 4, 2016

Responses to the comments in these letters are provided below, after each letter.



Antelope Valley Air Quality Management District
43301 Division St., Suite 206
Lancaster, CA 93535-4649

661.723.8070
Fax 661.723.3450

Eldon Heaston, Executive Director

In reply, please refer to AV1215/117

December 7, 2015

Mr. Matthew Diaz
County of Los Angeles
Chief Executive Office
754 Kenneth Hahn Hall of Administration
500 West Temple Street
Los Angeles, California 90012

Project: Draft Environmental Impact Report for the Mira Loma Women’s Detention Center Project (SCH No. 2014091012).

Dear Mr. Diaz:

The Antelope Valley Air Quality Management District (District) has received the Draft Environmental Impact Report (Report) for the Mira Loma Women’s Detention Center Project.

The District has reviewed the Report and concurs with the proposed analysis of the air quality impacts associated with the intended project. The District also appreciates the focus on fugitive dust issues and that the proposed project must comply with the all requirements outlined in District Rule 403, Fugitive Dust, including submittal of a Dust Control Plan prior to initiating construction.

AVAQMD-1

The Report also references possible demolition/renovation of existing structures located the project property. The proposed project must comply with the all requirements outlined in District Rule 1403, Asbestos Emissions from Demolition/Renovation Activities, including submittal of an asbestos survey for all structures to demolished and/or renovated.

AVAQMD-2

Lastly, all diesel fueled construction equipment must comply with the California Code of Regulations (CCR) §2449 for the In-Use, Off-Road Diesel Vehicle Regulation.

AVAQMD-3

Thank you for the opportunity to review this planning document. If you have any questions regarding the information presented in this letter please contact me at (661) 723-8070 ext. 2 or bbanks@avaqmd.ca.gov.

Sincerely,

Bret Banks
Operations Manager



2.1.1 ANTELOPE VALLEY AIR QUALITY MANAGEMENT DISTRICT (AVAQMD)

December 7, 2015

AVAQMD-1

Thank you for your review of the Draft EIR and your concurrence with the proposed analysis of project air quality impacts as well as your expression of appreciation for the focus in the Draft EIR on fugitive dust issues and the requirements of the Antelope Valley Air Quality Management District's (AVAQMD's) Rule 403. As stated in the comment, as discussed in Section 4.2, Air Quality, and as stated in Regulatory Requirement (RR) AIR-1, all construction activities must be conducted in compliance with all applicable AVAQMD rules and regulations. RR AIR-1 provides a listing of the AVAQMD Rules applicable to the construction of the Project. Rule 403, Fugitive Dust, requires measures such as watering and control of track-out from the site and requires submittal of a Dust Control Plan prior to the start of construction.

AVAQMD-2

As described in Section 4.6, Hazards and Hazardous Materials, and as stated in RR HAZ-4, any Project-related demolition activities that have the potential to expose construction workers and/or the public to asbestos-containing materials (ACMs) or lead-based paint (LBP) will be conducted in accordance with applicable regulations, including, but not limited to AVAQMD's Rule 1403.

AVAQMD-3

As set forth in Section 4.2, Air Quality, and as stated in RR AIR-3, all construction activities will be conducted in compliance with the *California Code of Regulations* (CCR, specifically Title 13 Section 2485), which prohibits all diesel-fueled commercial motor vehicles from idling for more than five consecutive minutes at any location. Similarly, the Project will be operated in compliance with all applicable regulations, including 13 CCR 2449 for In-Use, Off-Road Diesel Vehicle Regulations.



COUNTY OF LOS ANGELES

FIRE DEPARTMENT

1320 NORTH EASTERN AVENUE
LOS ANGELES, CALIFORNIA 90063-3294

DARYL L. OSBY
FIRE CHIEF
FORESTER & FIRE WARDEN

November 23, 2015

Capital Projects/Debt Management Division
Mira Loma Women's Detention
County of Los Angeles Chief Executive Office
754 Kenneth Hahn Hall of Administration
500 West Temple Street
Los Angeles, CA 90012

Dear Sir or Madam:

NOTICE OF AVAILABILITY OF THE DRAFT ENVIRONMENTAL IMPACT REPORT AND NOTICE OF PUBLIC MEETING, "MIRA LOMA WOMEN'S DETENTION CENTER PROJECT", PROPOSES REUSE, RENOVATION, AND EXPANSION OF THE MAJORITY OF THE CURRENTLY UNOCCUPIED MLDC PROPERTY TO PROVIDE A TOTAL OF 1,604 BEDS FOR LOW-TO-MEDIUM-SECURITY FEMALE INMATES, 45100 60TH STREET WEST, LANCASTER (FFER 201500196)

The Notice of Availability of the Draft Environmental Impact Report and Notice of Public Meeting has been reviewed by the Planning Division, Land Development Unit, Forestry Division, and Health Hazardous Materials Division of the County of Los Angeles Fire Department. The following are their comments:

PLANNING DIVISION:

1. In Section 4.12.2, Public Services and Recreation, Existing Conditions, Fire Protection and Emergency Medical Services, the distances to the project site included in Table 4.12.1 should be corrected as follows:

Fire Station 84 - 4.7 miles
Fire Station 112 - 6.9 miles
Fire Station 134 - 5.7 miles

} LACFD-1

SERVING THE UNINCORPORATED AREAS OF LOS ANGELES COUNTY AND THE CITIES OF:

- | | | | | | | | |
|--------------|-----------|------------------|----------------------|-----------|----------------------|-----------------------|------------------|
| AGOURA HILLS | CALABASAS | DIAMOND BAR | HIDDEN HILLS | LA MIRADA | MALIBU | POMONA | SIGNAL HILL |
| ARTESIA | CARSON | DUARTE | HUNTINGTON PARK | LA PUENTE | MAYWOOD | RANCHO PALOS VERDES | SOUTH EL MONTE |
| AZUSA | CERRITOS | EL MONTE | INDUSTRY | LAKEWOOD | NORWALK | ROLLING HILLS | SOUTH GATE |
| BALDWIN PARK | CLAREMONT | GARDENA | INGLEWOOD | LANCASTER | PALMDALE | ROLLING HILLS ESTATES | TEMPLE CITY |
| BELL | COMMERCE | GLENDDORA | IRWINDALE | LAWNDALE | PALOS VERDES ESTATES | ROSEMead | WALNUT |
| BELL GARDENS | COVINA | HAWAIIAN GARDENS | LA CANADA FLINTRIDGE | LOMITA | PARAMOUNT | SAN DIMAS | WEST HOLLYWOOD |
| BELLFLOWER | CUDAHY | HAWTHORNE | LA HABRA | LYNWOOD | PICO RIVERA | SANTA CLARITA | WESTLAKE VILLAGE |
| BRADBURY | | | | | | | WHITTIER |

In addition, in paragraph 3, the second sentence should be deleted, and the third sentence should be corrected to state the following:

Effective October 1, 2015, this station is staffed with a four-person assessment engine, which is an engine company with some limited paramedic capabilities, and a two-person paramedic squad.

LACFD-2

LAND DEVELOPMENT UNIT:

1. The proposed development may necessitate multiple ingress/egress access for the circulation of traffic and emergency response issues.
2. The development of this project must comply with all applicable code and ordinance requirements for construction, access, water mains, fire flows, and fire hydrants.
3. Specific fire and life safety requirements for the construction phase will be addressed at the building fire plan check. There may be additional fire and life safety requirements during this time.
4. Every building constructed shall be accessible to Fire Department's apparatus by way of access roadways with an all-weather surface of not less than the prescribed width. The roadway shall be extended to within 150 feet of all portions of the exterior walls when measured by an unobstructed route around the exterior of the building.
5. Fire Department's requirements for access, fire flows, and hydrants are addressed during the building permit stage.
6. The development may require fire flows up to 5,000 gallons per minute at 20 pounds per square inch residual pressure for up to a five-hour duration. Final fire flows will be based on the size of buildings, its relationship to other structures, property lines, and types of construction used.
7. Fire hydrant spacing shall be 300 feet and shall meet the following requirements:
 - a) No portion of lot frontage shall be more than 200 feet via vehicular access from a public fire hydrant.
 - b) No portion of a building shall exceed 400 feet via vehicular access from a properly spaced public fire hydrant.

LACFD-3

- c) Additional hydrants will be required if hydrant spacing exceeds specified distances.
 - d) When cul-de-sac depth exceeds 200 feet on a commercial street, hydrants shall be required at the corner and midblock.
 - e) A cul-de-sac shall not be more than 500 feet in length when serving land zoned for commercial use.
8. Turning radii shall not be less than 32 feet. This measurement shall be determined at the centerline of the road. A Fire Department approved turning area shall be provided for all driveways exceeding 150 feet in-length and at the end of all cul-de-sacs.
9. All on-site driveways/roadways shall provide a minimum unobstructed width of 28 feet, clear-to-sky. The on-site driveway is to be within 150 feet of all portions of the exterior walls of the first story of any building. The centerline of the access driveway shall be located parallel to and within 30 feet of an exterior wall on one side of the proposed structure.
10. Driveway width for non-residential developments shall be increased when any of the following conditions will exist:
- a) Provide 34 feet in-width when parallel parking is allowed on one side of the access roadway/driveway. Preference is that such parking is not adjacent to the structure.
 - b) Provide 42 feet in-width when parallel parking is allowed on each side of the access roadway/driveway.
 - c) Any access way less than 34 feet in-width shall be labeled "Fire Lane" on the final recording map and final building plans.
 - d) For streets or driveways with parking restrictions: The entrance to the street/driveway and intermittent spacing distances of 150 feet shall be posted with Fire Department approved signs stating "NO PARKING - FIRE LANE" in three-inch high letters. Driveway labeling is necessary to ensure access for Fire Department use.
11. All access devices and gates shall comply with California Code of Regulations, Title 19, Articles 3.05 and 3.16.

LACFD-3
cont.

12. All access devices and gates shall meet the following requirements:
 - a) Any single gated opening used for ingress and egress shall be a minimum of 26 feet in-width, clear-to-sky.
 - b) Any divided gate opening (when each gate is used for a single direction of travel i.e., ingress or egress) shall be a minimum width of 20 feet clear-to-sky.
 - c) Gates and/or control devices shall be positioned a minimum of 50 feet from a public right-of-way and shall be provided with a turnaround having a minimum of 32 feet of turning radius. If an intercom system is used, the 50 feet shall be measured from the right-of-way to the intercom control device.
 - d) All limited access devices shall be of a type approved by the Fire Department.
 - e) Gate plans shall be submitted to the Fire Department, prior to installation. These plans shall show all locations, widths and details of the proposed gates.
13. All proposals for traffic calming measures (speed humps/bumps/cushions, traffic circles, roundabouts, etc.) shall be submitted to the Fire Department for review, prior to implementation.
14. The County of Los Angeles Fire Department's Land Development Unit appreciates the opportunity to comment on this project.

LACFD-3
cont.

FORESTRY DIVISION – OTHER ENVIRONMENTAL CONCERNS:

1. The statutory responsibilities of the County of Los Angeles Fire Department's Forestry Division include erosion control, watershed management, rare and endangered species, vegetation, fuel modification for Very High Fire Hazard Severity Zones or Fire Zone 4, archeological and cultural resources, and the County Oak Tree Ordinance.
2. The areas germane to the statutory responsibilities of the County of Los Angeles Fire Department's Forestry Division have been addressed.

LACFD-4

HEALTH HAZARDOUS MATERIALS DIVISION:

1. The Health Hazardous Materials Division (HHMD) of the Los Angeles County Fire Department has no objection to the project; however, the Los Angeles County Department of Public Works, Environmental Program Division (LADPW-EPD) and Los Angeles Regional Water Quality Control Board (LARWQCB) oversaw the cleanup of a leaking underground storage tank (UST) at the site. The leaking UST case was closed as of September 9, 2003. Any concerns or questions regarding the former leaking UST should be addressed to the LADPW-EPD and LARWQCB.

} LACFD-5

If you have any additional questions, please contact this office at (323) 890-4330.

Very truly yours,



Handwritten signature: Kevin T. Johnson

KEVIN T. JOHNSON, ACTING CHIEF, FORESTRY DIVISION
PREVENTION SERVICES BUREAU

KTJ:ad

2.1.2 LOS ANGELES COUNTY FIRE DEPARTMENT (LACFD)

November 23, 2015

LACFD-1

The distances in Table 4.12-1 on page 4.12-3 have been revised in the Final EIR, per the information provided in the comment, to read "Fire Station 84 – 4.7 miles south; Fire Station 112 – 6.9 miles northwest; and Fire Station 134 – 5.7 miles southeast".

LACFD-2

The second sentence in the paragraph following Table 4.12-1 on page 4.12-3 has been revised in the Final EIR, per the information provided in the comment, to read "Effective October 1, 2015, this station is staffed with a four-person assessment engine, which is an engine company with some limited paramedic capabilities and a two-person paramedic squad (LACFD 2015)."

LACFD-3

This comment includes a listing of requirements provided by the LACFD Land Development Unit related to the building and construction standards that will be verified through the building fire plan check process. As discussed in Section 4.12, Public Services, and as required under Regulatory Requirement (RR) PS-1, the Project would be constructed in accordance with the County of Los Angeles Fire Code (Los Angeles County Code, Title 32) and the regulations of the Los Angeles County Fire Department, which include building construction standards that would reduce fire hazards and facilitate emergency response. This includes requirements for fire prevention and suppression measures, including construction materials, building access and evacuation routes, automatic fire-extinguishing systems, site access/fire lanes, water availability, fire flows, and hydrants, among other requirements. The LACFD will review and approve all building plans for compliance with fire safety regulations, including all applicable state and local requirements, which shall be verified prior to issuance of the certificate of occupancy.

LACFD-4

The comment's acknowledgement that all areas germane to the statutory responsibilities of the LACFD Forestry Division have been addressed in the Draft EIR is appreciated.

LACFD-5

Underground storage tanks (USTs) at the Project site are discussed in Section 4.7, Hazards and Hazardous Materials, which states that six older USTs at the MLDC were removed in 1999 and contamination was found in the soils. The soil contamination was remediated and the case was closed in 2003. This information is consistent with the comment from the LACFD Health Hazardous Materials Division.



COUNTY SANITATION DISTRICTS OF LOS ANGELES COUNTY

1955 Workman Mill Road, Whittier, CA 90601-1400
Mailing Address: P.O. Box 4998, Whittier, CA 90607-4998
Telephone: (562) 699-7411, FAX: (562) 699-5422
www.lacsd.org

GRACE ROBINSON HYDE
Chief Engineer and General Manager

January 11, 2016

Ref File No.: 3515030

County of Los Angeles Chief Executive Office
754 Kenneth Hahn Hall of Administration
500 West Temple Street
Los Angeles, CA 90012

Ladies and Gentlemen:

Comment Letter for the Mira Loma Women's Detention Center Project

The County Sanitation Districts of Los Angeles County (Districts) received a Draft Environmental Impact Report (DEIR) for the subject project on November 10, 2015. We offer the following updates and comments on the DEIR:

- | | | | |
|----|--|---|--------------|
| 1. | Previous comments submitted by the Districts in correspondence dated November 10, 2015 (copy enclosed), to Mr. Matthew Diaz of your agency, still apply to the subject project with the following updated information. | } | Districts -1 |
| 2. | The Lancaster Water Reclamation Plant (WRP) currently processes an average flow of 15 mgd. | } | Districts -2 |
| 3. | The expected increase in average wastewater flow from the proposed project, described in the DEIR as the reuse, renovation and expansion of the majority of the currently unoccupied Mira Loma Detention Center to provide a total of 1,604 inmate beds, is 98,700 gallons per day. | } | Districts -3 |
| 4. | In determining the impact to the Sewerage System and applicable connection fees, the Districts' Chief Engineer will determine the user category (e.g. Condominium, Single Family home, etc.) that best represents the actual or anticipated use of the parcel or facilities on the parcel. | } | Districts-4 |
| 5. | Page 4.14-13, first paragraph under <u>Wastewater (Sewer) Infrastructure and Treatment</u> – the Lancaster Water Reclamation Plant is located at 1865 West Avenue D in Lancaster. | } | Districts -5 |

If you have any questions, please contact the undersigned at (562) 908-4288, extension 2717.

Very truly yours,

Adriana Raza
Customer Service Specialist
Facilities Planning Department

AR:ar

Enclosure

cc: M. Sullivan
M. Tatalovich



COUNTY SANITATION DISTRICTS OF LOS ANGELES COUNTY

1955 Workman Mill Road, Whittier, CA 90601-1400
Mailing Address: P.O. Box 4998, Whittier, CA 90607-4998
Telephone: (562) 699-7411, FAX: (562) 699-5422
www.lacsd.org

GRACE ROBINSON HYDE
Chief Engineer and General Manager

October 6, 2014

Ref File No.: 3082017

Mr. Matthew Diaz
County of Los Angeles
Chief Executive Office
754 Kenneth Hahn
Hall of Administration
Los Angeles, CA 90012

Dear Mr. Diaz:

Mira Loma Detention Center Women's Facility Project

The County Sanitation Districts of Los Angeles County (Districts) received a Notice of Preparation of a Draft Environmental Impact Report for the subject project on September 4, 2014. We offer the following comments regarding sewerage service:

1. The proposed project may require a Districts' permit for Industrial Wastewater Discharge. Project developers should contact the Districts' Industrial Waste Section at extension 2900, in order to reach a determination on this matter. If this permit is necessary, project developers will be required to forward copies of final plans and supporting information for the proposed project to the Districts for review and approval before beginning project construction. For additional Industrial Wastewater Discharge Permit information, go to http://www.lacsd.org/wastewater/industrial_waste/permit.asp. } Districts -6
2. The wastewater flow originating from the proposed project will discharge to a local sewer line, which is not maintained by the Districts, for conveyance to the Districts' Avenue "I" West Trunk Sewer, located in Avenue I at 30th Street West. This 48-inch lined diameter trunk sewer has a design capacity of 53.9 million gallons per day (mgd) and conveyed a peak flow of 7.4 mgd when last measured in 2011. } Districts -7
3. The wastewater generated by the proposed project will be treated at the Lancaster Water Reclamation Plant, which has a design capacity of 18 mgd and currently processes an average flow of 13.4 mgd. } Districts -8
4. The expected average wastewater flow from the proposed project, an increase of 576 beds to accommodate a total of 1,616 inmates, is 100,800 gallons per day. For a copy of the Districts' average wastewater generation factors, go to www.lacsd.org, Wastewater & Sewer Systems, click on Will Serve Program, and click on the [Table 1, Loadings for Each Class of Land Use](#) link. } Districts -9

- 5. The Districts are empowered by the California Health and Safety Code to charge a fee for the privilege of connecting (directly or indirectly) to the Districts' Sewerage System for increasing the strength or quantity of wastewater attributable to a particular parcel or operation already connected. This connection fee is a capital facilities fee that is imposed in an amount sufficient to construct an incremental expansion of the Sewerage System to accommodate the proposed project. Payment of a connection fee will be required before a permit to connect to the sewer is issued. For more information and a copy of the Connection Fee Information Sheet, go to www.lacsd.org, Wastewater & Sewer Systems, click on Will Serve Program, and search for the appropriate link. For more specific information regarding the connection fee application procedure and fees, please contact the Connection Fee Counter at extension 2727.

- 6. In order for the Districts to conform to the requirements of the Federal Clean Air Act (CAA), the design capacities of the Districts' wastewater treatment facilities are based on the regional growth forecast adopted by the Southern California Association of Governments (SCAG). Specific policies included in the development of the SCAG regional growth forecast are incorporated into clean air plans, which are prepared by the South Coast and Antelope Valley Air Quality Management Districts in order to improve air quality in the South Coast and Mojave Desert Air Basins as mandated by the CCA. All expansions of Districts' facilities must be sized and service phased in a manner that will be consistent with the SCAG regional growth forecast for the counties of Los Angeles, Orange, San Bernardino, Riverside, Ventura, and Imperial. The available capacity of the Districts' treatment facilities will, therefore, be limited to levels associated with the approved growth identified by SCAG. As such, this letter does not constitute a guarantee of wastewater service, but is to advise you that the Districts intend to provide this service up to the levels that are legally permitted and to inform you of the currently existing capacity and any proposed expansion of the Districts' facilities.

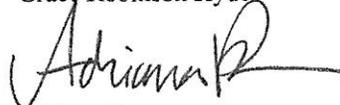
} Districts - 10

} Districts- 11

If you have any questions, please contact the undersigned at (562) 908-4288, extension 2717.

Very truly yours,

Grace Robinson Hyde



Adriana Raza
Customer Service Specialist
Facilities Planning Department

AR:ar

cc: L. Smith
M. Tremblay
J. Ganz



COUNTY SANITATION DISTRICTS OF LOS ANGELES COUNTY

1955 Workman Mill Road, Whittier, CA 90601-1400
Mailing Address: P.O. Box 4998, Whittier, CA 90607-4998
Telephone: (562) 699-7411, FAX: (562) 699-5422
www.lacsd.org

GRACE ROBINSON HYDE
Chief Engineer and General Manager

February 8, 2016

Ref File No.: 3515030

County of Los Angeles Chief Executive Office
Capital Projects/Debt Management Division
Attn: Mira Loma Women's Detention Center EIR
754 Kenneth Hahn Hall of Administration
500 West Temple Street
Los Angeles, CA 90012

Ladies and Gentlemen:

Comment Letter for the Mira Loma Women's Detention Center Project

The County Sanitation Districts of Los Angeles County (Districts) received a Draft Environmental Impact Report (DEIR) for the subject project on November 10, 2015. We offer the following updates and comments on the DEIR:

- | | | |
|---|---|--------------|
| 1. Previous comments submitted by the Districts in correspondence dated November 10, 2015 (copy enclosed), to Mr. Matthew Diaz of your agency, still apply to the subject project with the following updated information. | } | Districts -1 |
| 2. The Lancaster Water Reclamation Plant (WRP) currently processes an average flow of 15 mgd. | } | Districts -2 |
| 3. The expected increase in average wastewater flow from the proposed project, described in the DEIR as the reuse, renovation and expansion of the majority of the currently unoccupied Mira Loma Detention Center to provide a total of 1,604 inmate beds, is 98,700 gallons per day. | } | Districts -3 |
| 4. In determining the impact to the Sewerage System and applicable connection fees, the Districts' Chief Engineer will determine the user category (e.g. Condominium, Single Family home, etc.) that best represents the actual or anticipated use of the parcel or facilities on the parcel. | } | Districts -4 |
| 5. Page 4.14-13, first paragraph under <u>Wastewater (Sewer) Infrastructure and Treatment</u> – the Lancaster Water Reclamation Plant is located at 1865 West Avenue D in Lancaster. | } | Districts -5 |

If you have any questions, please contact the undersigned at (562) 908-4288, extension 2717.

Very truly yours,

Adriana Raza
Customer Service Specialist
Facilities Planning Department

AR:ar

Enclosure

cc: M. Sullivan
M. Tatalovich

DOC: #3577174.D1499



COUNTY SANITATION DISTRICTS
OF LOS ANGELES COUNTY

1955 Workman Mill Road, Whittier, CA 90601-1400
Mailing Address: P.O. Box 4998, Whittier, CA 90607-4998
Telephone: (562) 699-7411, FAX: (562) 699-5422
www.lacsd.org

GRACE ROBINSON HYDE
Chief Engineer and General Manager

October 6, 2014

Ref File No.: 3082017

Mr. Matthew Diaz
County of Los Angeles
Chief Executive Office
754 Kenneth Hahn
Hall of Administration
Los Angeles, CA 90012

Dear Mr. Diaz:

Mira Loma Detention Center Women's Facility Project

The County Sanitation Districts of Los Angeles County (Districts) received a Notice of Preparation of a Draft Environmental Impact Report for the subject project on September 4, 2014. We offer the following comments regarding sewerage service:

- 1. The proposed project may require a Districts' permit for Industrial Wastewater Discharge. Project developers should contact the Districts' Industrial Waste Section at extension 2900, in order to reach a determination on this matter. If this permit is necessary, project developers will be required to forward copies of final plans and supporting information for the proposed project to the Districts for review and approval before beginning project construction. For additional Industrial Wastewater Discharge Permit information, go to http://www.lacsd.org/wastewater/industrial_waste/permit.asp. } Districts -6
- 2. The wastewater flow originating from the proposed project will discharge to a local sewer line, which is not maintained by the Districts, for conveyance to the Districts' Avenue "I" West Trunk Sewer, located in Avenue I at 30th Street West. This 48-inch lined diameter trunk sewer has a design capacity of 53.9 million gallons per day (mgd) and conveyed a peak flow of 7.4 mgd when last measured in 2011. } Districts -7
- 3. The wastewater generated by the proposed project will be treated at the Lancaster Water Reclamation Plant, which has a design capacity of 18 mgd and currently processes an average flow of 13.4 mgd. } Districts -8
- 4. The expected average wastewater flow from the proposed project, an increase of 576 beds to accommodate a total of 1,616 inmates, is 100,800 gallons per day. For a copy of the Districts' average wastewater generation factors, go to www.lacsd.org, Wastewater & Sewer Systems, click on Will Serve Program, and click on the [Table 1, Loadings for Each Class of Land Use](#) link. } Districts -9

- 5. The Districts are empowered by the California Health and Safety Code to charge a fee for the privilege of connecting (directly or indirectly) to the Districts' Sewerage System for increasing the strength or quantity of wastewater attributable to a particular parcel or operation already connected. This connection fee is a capital facilities fee that is imposed in an amount sufficient to construct an incremental expansion of the Sewerage System to accommodate the proposed project. Payment of a connection fee will be required before a permit to connect to the sewer is issued. For more information and a copy of the Connection Fee Information Sheet, go to www.lacsd.org, Wastewater & Sewer Systems, click on Will Serve Program, and search for the appropriate link. For more specific information regarding the connection fee application procedure and fees, please contact the Connection Fee Counter at extension 2727.

- 6. In order for the Districts to conform to the requirements of the Federal Clean Air Act (CAA), the design capacities of the Districts' wastewater treatment facilities are based on the regional growth forecast adopted by the Southern California Association of Governments (SCAG). Specific policies included in the development of the SCAG regional growth forecast are incorporated into clean air plans, which are prepared by the South Coast and Antelope Valley Air Quality Management Districts in order to improve air quality in the South Coast and Mojave Desert Air Basins as mandated by the CCA. All expansions of Districts' facilities must be sized and service phased in a manner that will be consistent with the SCAG regional growth forecast for the counties of Los Angeles, Orange, San Bernardino, Riverside, Ventura, and Imperial. The available capacity of the Districts' treatment facilities will, therefore, be limited to levels associated with the approved growth identified by SCAG. As such, this letter does not constitute a guarantee of wastewater service, but is to advise you that the Districts intend to provide this service up to the levels that are legally permitted and to inform you of the currently existing capacity and any proposed expansion of the Districts' facilities.

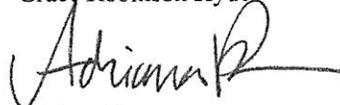
} Districts - 10

} Districts- 11

If you have any questions, please contact the undersigned at (562) 908-4288, extension 2717.

Very truly yours,

Grace Robinson Hyde



Adriana Raza
Customer Service Specialist
Facilities Planning Department

AR:ar

cc: L. Smith
M. Tremblay
J. Ganz

2.1.3 LOS ANGELES COUNTY SANITATION DISTRICTS (DISTRICTS)

The Los Angeles County Sanitation Districts (Districts) submitted two separate letters with the same information, one dated January 11, 2016 and one dated February 8, 2016, corresponding to the extended comment period for the proposed Project.

January 11, 2016/February 8, 2016

Districts-1

Responses to the Districts' letter provided to the County on October 6, 2014 (Districts Reference File Number 3082017) are presented below in responses Districts-6 through Districts-11.

Districts-2

The last sentence in the paragraph following Table 4.14-3 on page 4.14-13 has been revised in the Final EIR, per the information provided in the comment, to read "This trunk sewer eventually connects to the Lancaster Water Reclamation Plant at 1865 West Avenue D in Lancaster, which has a design capacity of 18 mgd and currently processes an average of 15 mgd (LACSD 2014a, 2016)."

Districts-3

The first sentence of the third paragraph under Threshold 4.14e on page 4.14-30 has been revised in the Final EIR, per the information provided in the comment, to read "The LACSD estimated the average wastewater flow increase from the Project to be 98,700 gpd (LACSD 2016)."

Districts-4

As discussed in Section 4.14, Utilities and Service Systems, the Districts may charge a fee for the privilege of connecting (directly or indirectly) to their system or increasing the strength or quantity of wastewater attributable to an operation that is already connected. When the LACSD determines the appropriate fee based on the applicable user category, the proposed Project would be subject to payment of the Districts' connection and service fees, as set forth in Regulatory Requirement (RR) UTL-1.

Districts-5

This address has been revised in the Final EIR, per the information provided in the comment, as noted in response Districts -2.

Districts-6

As set forth in Section 4.14, Utilities and Service Systems, the Project would not generate industrial wastewater (i.e., wastewater from manufacturing, processing, institutional, commercial, or agricultural operation, or any operation where the wastewater discharged includes significant quantities of waste of non-human origin). The Project is required to comply with the LACSD's Wastewater Ordinance (RR UTL-1), which mandates that all wastewater discharges into Districts facilities comply with the discharge standards. If the Districts determines through their review of final plans and supporting information that an Industrial Wastewater Discharge permit is required, the Project must obtain the permit from the LACSD and comply with applicable permit restrictions.

Districts-7

The information requested is provided on page 4.14-30 of the Draft EIR.

Districts-8

The information requested is provided on page 4.14-13 of the Draft EIR, but will be revised per response Districts-2 above.

Districts-9

The information requested is provided on page 4.14-30 of the Draft EIR, but will be revised per response Districts-3.

Districts-10

The information requested is provided on page 4.14-30 of the Draft EIR.

Districts-11

As discussed in Section 4.9, Land Use and Planning, the proposed Project would not require a General Plan Amendment or a zone change, and would therefore not result in growth that was not anticipated in the development of the Southern California Association of Governments (SCAG) regional growth forecasts. The Project would not conflict with plans, policies, or regulations related to regional land use, transportation, air quality, or other issues, as demonstrated through the consistency analysis presented in Tables 4.9-1 through 4.9-4 in Section 4.9, Land Use and Planning.



EDMUND G. BROWN JR.
GOVERNOR

STATE OF CALIFORNIA
GOVERNOR'S OFFICE of PLANNING AND RESEARCH
STATE CLEARINGHOUSE AND PLANNING UNIT



KEN ALEX
DIRECTOR

Memorandum

Date: January 28, 2016
To: All Reviewing Agencies
From: Scott Morgan, Director
Re: SCH # 2014091012
Mira Loma Women's Detention Center Project

Pursuant to the attached letter, the Lead Agency has *extended* the review period for the above referenced project to **March 2, 2016** to accommodate the review process. All other project information remains the same.

Please contact the Lead Agency for further information if you no longer have the project.

SCH-1

cc: Matthew Diaz
County of Los Angeles
754 KH Hall of Administration,
500 West Temple Street
Los Angeles, CA 90012

Notice of Completion & Environmental Document Transmittal

Mail to: State Clearinghouse, P.O. Box 3044, Sacramento, CA 95812-3044 (916) 445-0613
 For Hand Delivery/Street Address: 1400 Tenth Street, Sacramento, CA 95814

SCH # 2014091012

Project Title: Mira Loma Women's Detention Center Project
 Lead Agency: County of Los Angeles Contact Person: Matthew Diaz
 Mailing Address: 754 KH Hall of Administration, 500 West Temple Street Phone: (213) 974-4260
 City: Los Angeles Zip: 90012 County: Los Angeles

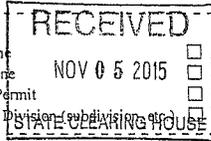
Project Location: County: Los Angeles City/Nearest Community: Lancaster
 Cross Streets: 45100 60th Street West Zip Code: 93536
 Longitude/Latitude (degrees, minutes and seconds): 34°42'4.1" N/118°13'57" W Total Acres: 46
 Assessor's Parcel No.: 3203-041-901 Section: 14 Twp: 7N Range: 13W Base: SBM
 Within 2 Miles: State Hwy. #: 14 Waterways: _____
 Airports: Fox Airfield Railways: _____ Schools: _____

Document Type:

- CEQA: NOP Draft EIR NEPA: NOI Other: Joint Document
 Early Cons Supplement/Subsequent EIR EA Final Document
 Neg Dec (Prior SCH No.) _____ Draft EIS Other: _____
 Mit Neg Dec Other: _____ FONSI

Local Action Type:

- General Plan Update Specific Plan Rezone Annexation
 General Plan Amendment Master Plan Prezone Redevelopment
 General Plan Element Planned Unit Development Use Permit Coastal Permit
 Community Plan Site Plan Land Division (subdivision, etc.) Other: _____



Development Type:

- Residential: Units _____ Acres _____
 Office: Sq. ft. _____ Acres _____ Employees _____
 Commercial: Sq. ft. _____ Acres _____ Employees _____
 Industrial: Sq. ft. _____ Acres _____ Employees _____
 Educational _____
 Recreational _____
 Water Facilities: Type _____ MGD _____
 Transportation: Type _____
 Mining: Mineral _____
 Power: Type _____ MW _____
 Waste Treatment: Type _____ MGD _____
 Hazardous Waste: Type _____
 Other: Women's Detention Center

Project Issues Discussed in Document:

- Aesthetics/Visual Fiscal Recreation/Parks Vegetation
 Agricultural Land Flood Plain/Flooding Schools/Universities Water Quality
 Air Quality Forest Land/Fire Hazard Septic Systems Water Supply/Groundwater
 Archaeological/Historical Geologic/Seismic Sewer Capacity Wetland/Riparian
 Biological Resources Minerals Soil Erosion/Compaction/Grading Growth Inducement
 Coastal Zone Noise Solid Waste Land Use
 Drainage/Absorption Population/Housing Balance Toxic/Hazardous Cumulative Effects
 Economic/Jobs Public Services/Facilities Traffic/Circulation Other: _____

Present Land Use/Zoning/General Plan Designation:

Detention Center/Public Use/Public

Project Description: *(please use a separate page if necessary)*

The Project involves the reuse and expansion of the existing Mira Loma Detention Facility, which is currently not occupied with inmates or serving detention functions. The Project would provide a total of 1,604 beds for low- to medium-security female inmates. Existing structures would be renovated; new buildings constructed; and some structures demolished to upgrade the existing facility and accommodate the needs of female inmates and programs for an education-based incarceration. Upon completion of the Project, low- to medium-security female inmates would be transferred to the Project site from other County jail facilities.

State Clearinghouse Contact: SM
 (916) 445-0613

State Review Began: 11-05-2015

SCH COMPLIANCE 3-2
1-12-2016

Note: Extended Per Lead

Please note State Clearinghouse Number (SCH#) on all Comments

SCH#: 2014091012

Please forward late comments directly to the Lead Agency

AQMD/APCD 33

(Resources: 11, 07)

Project Sent to the following State Agencies

- | | |
|--|---|
| <input checked="" type="checkbox"/> Resources | State/Consumer Svcs |
| <input type="checkbox"/> Boating & Waterways | General Services |
| <input type="checkbox"/> Coastal Comm | Cal EPA |
| <input type="checkbox"/> Colorado Rvr Bd | <input checked="" type="checkbox"/> ARB: ALL Other Projects |
| <input type="checkbox"/> Conservation | ARB: Transportation Projects |
| <input checked="" type="checkbox"/> CDFW # <u>5</u> | ARB: Major Industrial/Energy |
| <input type="checkbox"/> Delta Protection Comm | <input checked="" type="checkbox"/> SWRCB: Div. of Drinking Water |
| <input type="checkbox"/> Cal Fire | SWRCB: Div. Financial Assist. |
| <input type="checkbox"/> Historic Preservation | SWRCB: Wtr Quality |
| <input checked="" type="checkbox"/> Parks & Rec | SWRCB: Wtr Rights |
| <input type="checkbox"/> Central Valley Flood Prot. | <input checked="" type="checkbox"/> Reg. WQCB # <u>6V</u> |
| <input type="checkbox"/> Bay Cons & Dev Comm. | <input checked="" type="checkbox"/> Toxic Sub Ctrl-CTC |
| <input checked="" type="checkbox"/> DWR | Yth/Adlt Corrections |
| <input type="checkbox"/> OES | <input checked="" type="checkbox"/> Corrections |
| <input type="checkbox"/> Resources, Recycling and Recovery | |
| CalSTA | Independent Comm |
| <input checked="" type="checkbox"/> Aeronautics | Energy Commission |
| <input checked="" type="checkbox"/> CHP | <input checked="" type="checkbox"/> NAHC |
| <input checked="" type="checkbox"/> Caltrans # <u>7</u> | Public Utilities Comm |
| <input type="checkbox"/> Trans Planning | State Lands Comm |
| | Tahoe Rgl Plan Agency |
| Other | |
| <input type="checkbox"/> HCD | Conservancy |
| <input type="checkbox"/> Food & Agriculture | Other: _____ |

2.1.4 STATE OF CALIFORNIA CLEARINGHOUSE AND PLANNING UNIT (SCH)

January 28, 2016

SCH-1

This comment letter acknowledges that the Governor's Office of Planning and Research (OPR) has received notice that the public review period for the Draft EIR was extended through March 2, 2016, and that all other information remains the same. The letter attaches a copy of the original Notice of Completion (NOC) for the proposed Project, which was received by the OPR on November 5, 2015.



EDMUND G. BROWN JR.
GOVERNOR

STATE OF CALIFORNIA
GOVERNOR'S OFFICE of PLANNING AND RESEARCH
STATE CLEARINGHOUSE AND PLANNING UNIT



KEN ALEX
DIRECTOR

March 4, 2016

Matthew Diaz
Los Angeles County
754 KH Hall of Administration, 500 West Temple Street
Los Angeles, CA 90012

Subject: Mira Loma Detention Center Women's Facility Project
SCH#: 2014091012

Dear Matthew Diaz:

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. The review period closed on March 2, 2016, and no state agencies submitted comments by that date. This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act.

Please call the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process. If you have a question about the above-named project, please refer to the ten-digit State Clearinghouse number when contacting this office.

} SCH-1

Sincerely,

Scott Morgan
Director, State Clearinghouse

**Document Details Report
State Clearinghouse Data Base**

SCH# 2014091012
Project Title Mira Loma Detention Center Women's Facility Project
Lead Agency Los Angeles County

Type EIR Draft EIR
Description Note: Extended Per Lead

The Project involves the reuse and expansion of the Mira Loma Detention Facility, which is currently not occupied with inmates or serving detention functions, to provide a total of 1,604 beds for low- to medium-security female inmates. Existing structures would be renovated; new buildings constructed; and some structures demolished to upgrade the existing facility and accommodate the needs of inmates and programs for an education-based incarceration. Upon completion of the Project, low- to medium-security female inmates would be transferred to the Project site from other County jail facilities.

Lead Agency Contact

Name Matthew Diaz
Agency Los Angeles County
Phone 213 974 4260 **Fax**
email
Address 754 KH Hall of Administration, 500 West
City Temple Street **State** CA **Zip** 90012
Los Angeles

Project Location

County Los Angeles
City Lancaster
Region
Lat / Long 34° 42' 4.1" N / 118° 13' 57" W
Cross Streets 45100 60th Street West
Parcel No. 3203-041-901
Township 7N **Range** 13W **Section** 14 **Base** SBB&M

Proximity to:

Highways Hwy 14
Airports Fox Airfield
Railways
Waterways
Schools
Land Use Detention Center / Public Use / Public

Project Issues Archaeologic-Historic; Biological Resources; Drainage/Absorption; Flood Plain/Flooding; Forest Land/Fire Hazard; Geologic/Seismic; Noise; Population/Housing Balance; Public Services; Recreation/Parks; Schools/Universities; Sewer Capacity; Soil Erosion/Compaction/Grading; Solid Waste; Toxic/Hazardous; Traffic/Circulation; Vegetation; Water Quality; Water Supply; Wetland/Riparian; Growth Inducing; Landuse; Cumulative Effects

Reviewing Agencies Resources Agency; Department of Fish and Wildlife, Region 5; Department of Parks and Recreation; Department of Water Resources; Caltrans, Division of Aeronautics; California Highway Patrol; Caltrans, District 7; Air Resources Board; State Water Resources Control Board, Division of Drinking Water; Regional Water Quality Control Bd., Region 6 (Victorville); Department of Toxic Substances Control; Department of Corrections; Native American Heritage Commission

Date Received 11/05/2015 **Start of Review** 11/05/2015 **End of Review** 03/02/2016

Note: Blanks in data fields result from insufficient information provided by lead agency.

2.1.5 STATE OF CALIFORNIA CLEARINGHOUSE AND PLANNING UNIT (SCH)

March 4, 2016

SCH-1

This comment letter acknowledges that the Governor's Office of Planning and Research (OPR) has received notice that the public review period for the Draft EIR was extended through March 2, 2016, and that no state agencies had submitted comments by that date. The letter acknowledges that the County has complied with the State Clearinghouse review requirements.

2.2 **ORGANIZATIONS**

Comment letters from organizations include:

- Antelope Valley Rural Museum (AVRM), January 11, 2016
- Californians United for a Responsible Budget (CURB), January 8, 2016
- Critical Resistance Los Angeles (CRLA) et al., January 12, 2016
- National Day Laborer Organizing Network (NDLON), January 5, 2016
- National Immigration Law Center (NILC), January 12, 2016
- Weingart, January 7, 2016
- Women of Color in the Global Women's Strike (WOC), January 11, 2016

Responses to the comments in these letters are provided below, after each letter.

Antelope Valley Rural Museum
PO Box 1316
Lancaster, CA 93584

Place
Stamp
Here

MR. MATTHEW DIAZ
COUNTY OF LOS ANGELES CHIEF EXECUTIVE OFFICE
754 KENNETH HAHN HALL OF ADMINISTRATION
500 WEST TEMPLE STREET
LOS ANGELES, CALIFORNIA 90012

ATTN: MIRA LOMA WOMEN'S DETENTION CENTER PROJECT

environmental@ceo.lacounty.gov



MIRA LOMA WOMEN'S DETENTION CENTER PROJECT
PUBLIC MEETING- DECEMBER 8, 2015
6:00 TO 8:00 PM

COMMENTS:

On January 6, 2016 the Antelope Valley Rural Museum Board of Directors voted unanimously to support the effort to preserve the War Eagle Field (located on the SE corner of Avenue I and 60th Street West in Lancaster, California and to designate as a National Historical Landmark.

We also would like to not only save the historical buildings, but we would like to give them purpose by moving our ever expanding museum displays and resources to the War Eagle Field.

Sincerely,

Bill Rawlings

Finance Officer

AVRM

NAME: Bill Rawlings & the Board of Directors of the Antelope Valley Rural Museum

ADDRESS: 44727 Fig Avenue, Lancaster, CA 93534

E-MAIL: avmuseum@verizon.net

AVRM-1

2.2.1 ANTELOPE VALLEY RURAL MUSEUM (AVRM)

January 11, 2016

AVRM-1

The comment indicates the support of this group for any efforts to preserve War Eagle Field as a national landmark and potentially locate a museum on the site. Designation of the Polaris Flight Academy Historic District (Historic District), referred to as the War Eagle Field, as a National Historic Landmark would require the support of the County of Los Angeles, as the property owner, before pursuing any nomination of the property to the National Park Service. At this time, the County of Los Angeles has not formally considered the potential for such actions, which is beyond the scope of the proposed Project, but the proposed Project would not adversely affect the pursuit of recognition of the significance of this historic site at either the national or local levels.

As discussed in Section 4.4, Cultural Resources, the majority of the proposed renovation and new construction would occur outside the Historic District. Project implementation would only affect non-contributing features of the Historic District; therefore, the Project would not materially alter the physical characteristics that convey the significance of the historical resources. The future uses of these buildings and structures, beyond the requirement to preserve the integrity of the Historic District, is outside the scope of the proposed Project. This Final EIR, including all comments submitted to the County on the Draft EIR, will be provided to the County of Los Angeles Board of Supervisors. Therefore, your interest in the potential recognition of the historic district will be presented directly to the decision makers prior to consideration of Project approval.



Californians United for a Responsible Budget

Oakland Office:
1322 Webster St # 210 Oakland, CA 94612
510-435-1176 (c) 510-839-7615 (f)

Los Angeles Office:
1137 E. Redondo Blvd. Inglewood, CA
213-864-8931(c)

www.curbprisonspending.org

January 8, 2016

Los Angeles Board of Supervisors
383 Kenneth Hahn Hall of Administration
500 West Temple Street
Los Angeles 90012
executiveoffice@bos.lacounty.gov
Fax: (213) 633-5100

Re: Language access for Draft EIR for Proposed Women’s Jail
(Capital Project No. 69719)

Dear Board of Supervisors:

We are writing to formally request a Spanish translation of the Draft Environmental Impact Report (DEIR) of the proposed women’s jail at Mira Loma Detention Center. We also request the lead agency to hold an additional public meeting in Spanish or with Spanish translation available in order for community members with limited English proficiency to participate in the public comment process.

This was a request that was submitted during the Initial Scoping Process that was not answered in the Draft Environmental Process.

Failure to meet this request would violate Civil Rights Acts of 1964, and the Title VI regulations, which prohibits discrimination based on national origin, and Executive order 13166 issued in 2000, and provide grounds for legal prosecution¹. The County must accommodate language services for individuals who do not speak English as their primary language and who have a limited ability to read, speak, write or understand English.

The California Natural Resources Agency which oversees the Environmental Quality Act (CEQA) deems public participation and comment during any environmental review process as an “essential part of the CEQA process”. Failure to provide language access hinders residents’ meaningful participation in the CEQA review process and is subject to legal prosecution².

In addition, the County hosted a public meeting for the DEIR on December 8, 2015 without Spanish interpreters further barring public participation in the environmental review process.

Please notify Diana Zuñiga by Monday, January 11 whether the county will translate the DEIR and hold another public meeting with Spanish interpreters available.

Sincerely,

¹ http://www.lep.gov/guidance/tips_and_tools-9-21-04.htm

² http://www.ca-ilg.org/sites/main/files/file-attachments/resources_Language_Access_Guide_formatted_9-27-11_0.pdf

CURB-1

Diana Zuñiga
Diana@curbprisonspending.org
213-864-8931

Cc:

Michael D. Antonovich, Supervisor
Email: FifthDistrict@lacos.org
Fax: 213-974-1010

Hilda Solis, Supervisor
Email: firstdistrict@bos.lacounty.gov
Fax: 213-613-1739

Mark Ridley-Thomas, Supervisor
Email: MarkRidley-Thomas@bos.lacounty.gov
Fax: 213-680-3283

Sheila Kuehl, Supervisor
Email: sheila@bos.lacounty.gov
Fax: 213-625-7360

Don Knabe, Supervisor
Email: don@bos.lacounty.gov
Fax: 213-626-6941

CEO Office
email: environmental@ceo.lacounty.gov

8 de Enero de 2016

La Junta de Supervisores del Condado de Los Angeles
383 Kenneth Hahn Hall of Administration
500 West Temple Street
Los Angeles 90012
executiveoffice@bos.lacounty.gov
Fax: (213) 633-5100

Re: Acceso al idioma del plan preliminar del EIR para la cárcel propuesta para mujeres
(Capital Project No. 69719)

Estimado Junta de Supervisores:

Le escribimos para solicitar formalmente una traducción en español del Informe Preliminar del Impacto Ambiental (DEIR) para la cárcel propuesta para mujeres en Mira Loma Detention Center. También solicitamos que la agencia principal organice un cita adicional en español o que tengan traducción en español disponible para que miembros de la comunidad puedan participar en el proceso de comentarios públicos.

Esta fue una petición que solicitamos durante el proceso de alcance inicial. La petición no fue contestada en el proceso del preliminar del impacto ambiental (DEIR).

El incumplimiento de esta solicitud violaría leyes de derechos civiles de 1964, y las regulaciones del Título VI, que prohíbe la discriminación basada en el origen nacional, y la Orden Ejecutiva 13166 (2000), y proporcione motivos del procesamiento legal. El condado debe dar cabida a servicios de idiomas para las personas que no hablan Inglés como su idioma principal y que tienen una capacidad limitada para leer, hablar, escribir o entender Inglés.

La Agencia de Recursos Naturales de California que supervisa la Ley de Calidad Ambiental (CEQA) considera la participación del público y el comentario durante cualquier proceso de revisión ambiental como una "parte esencial del proceso de CEQA." Falta de proporcionar el acceso del idioma principal obstaculiza la participación de los miembros de la comunidad en el CEQA proceso y está sujeto a persecución legal.

Adicionalmente, el condado organizó una cita pública para el DEIR el 8 de Diciembre de 2015 sin intérpretes españoles restringiendo participación pública en el proceso de revisión ambiental.

Por favor de notificarse hasta el día lunes 11 de Enero de 2016 con Diana Zuñiga si el condado va a traducir el DEIR y tener otra cita pública con intérpretes españoles.

Respetuosamente,

Diana Zuñiga
Diana@curbprisonspending.org
213-864-8931

Cc:

CURB-2

Michael D. Antonovich, Supervisor
Email: FifthDistrict@lacbos.org
Fax: 213-974-1010

Hilda Solis, Supervisor
Email: firstdistrict@bos.lacounty.gov
Fax: 213-613-1739

Mark Ridley-Thomas, Supervisor
Email: MarkRidley-Thomas@bos.lacounty.gov
Fax: 213-680-3283

Sheila Kuehl, Supervisor
Email: sheila@bos.lacounty.gov
Fax: 213-625-7360

Don Knabe, Supervisor
Email: don@bos.lacounty.gov
Fax: 213-626-6941

CEO Office
email: environmental@ceo.lacounty.gov

2.2.2 CALIFORNIANS UNITED FOR A RESPONSIBLE BUDGET (CURB)

January 8, 2016

CURB-1

In response to the commenter's request for Spanish translation of the Project's Draft Environmental Impact Report (EIR) and Spanish interpreters at an additional public meeting, the Los Angeles County Chief Executive Office provided a responsive letter to Californians United for a Responsible Budget (CURB), attention to Ms. Diana Zuniga on January 22, 2016. This letter was also sent to Marcela Hernandez of the Immigrant Youth Coalition, Claudia Bautista of the National Day Laborer Organizing Network, Felicia Gomez of the California Immigrant Policy Center, and Shiu-Ming Cheer of the National Immigration Law Center in response to similar requests. Follow up communications with Ms. Zuniga even before the notice of a new comment period confirmed the date of the second public meeting as February 9, 2016. The letter to CURB and others reads as follows:

We are responding to your letter dated Friday, January 8, 2016, addressed to the Los Angeles County Board of Supervisors. You requested a response regarding "whether the County will translate the Draft Environmental Impact Report (EIR) and hold another public meeting with Spanish interpreters available" with respect to the proposed Mira Loma Women's Detention Center Renovation Project (MLWDC) at Mira Loma in Lancaster.

We appreciate that you are following the review process for the proposed MLWDC project, and respond to your requests here. The County will voluntarily add additional outreach. We will hold a second community meeting in Lancaster to discuss the Draft EIR conclusions and process and invite submission of comments. Once the location and time of the meeting has been determined, a notice in English and Spanish will be provided via a similar notification process as the November 9, 2015, release of the Draft EIR. At this meeting, we will have real time Spanish language translation available, in the event members of the public request this service. Additionally, in light of the unique nature of this detention facility project, the County also will provide a written Spanish translation of the Executive Summary of the Draft EIR. That Draft EIR section summarizes the description, location and setting of the proposed MLWDC project, the project alternatives considered, the concerns raised during the scoping process, and the potential environmental impacts. The Executive Summary also provides the entire list of proposed Project Design Features, Regulatory Requirements and Mitigation Measures. This translation will be made available at the Quartz Hill and Lancaster Libraries, Los Angeles County Public Information Office, and online for download. The County will also provide additional time to accept public comments on the Draft EIR after the written translation is available.

Throughout the California Environmental Quality Act (CEQA) review process for the MLWDC project, the County has voluntarily broadened public outreach beyond what is legally required. As you are aware, the noticed CEQA comment period closed on January 12, 2016, after being open from November 9, 2015. The County voluntarily provided an extended comment period for more than the required 45 days, to avoid any inconvenience to commenters from the holidays occurring in the comment period.

As another example of the County's broad public outreach efforts, the original scoping period was noticed to include the public and interested stakeholders early in the process, although that is not required by law. The County also held a noticed community meeting in the Lancaster community during the Draft EIR comment period, for anyone interested in learning more about the CEQA and public comment process. At that meeting, held on December 8, 2015, there was a presentation on the project description and the CEQA review and comment process. A number of speakers, including CURB, raised approximately 30 different questions at that meeting. No one attending that public community meeting asked for the assistance of a translator for themselves or others. Had they done so, County staff at the meeting would have assisted in Spanish translation.

Also, as you are aware, at the Board of Supervisors' regular meetings, Spanish translation services are available. We appreciate your comments and have responded with specific additional opportunities for public participation.

As stated above, the first of two public meetings was held to provide an overview of the Project and the conclusions of the Draft EIR on Tuesday, December 8, 2015, from 6:00 PM to 8:00 PM at the James C. Gilley Lancaster National Soccer Center Eastside Activity Center, which is located at 43000 30th Street East, Lancaster, CA 93535. There were approximately 15 attendees at the first public meeting, and some submitted written comments. Attendance at this public meeting was voluntary and was not required to submit comments on the Draft EIR.

Subsequently, in January 2016, in response to requests from the public to provide an additional extension of the public review period and an additional public meeting, a *Notice of Extended Comment Period for the Draft Environmental Impact Report for the Mira Loma Women's Detention Center Project and Notice of Second Public Meeting in Lancaster, California* (Notice) was sent to the 2015 Notice of Availability (NOA) mailing list, email list, an additional mailing list of contacts that had provided comment letters during the Draft EIR public review period up to the time of the mailing. This Notice extended the Draft EIR public review period from Monday, February 1, 2016, through Wednesday, March 2, 2016. This 30-day extension was in addition to the original 64-day Draft EIR public review period. All written comments received on the Draft EIR from Monday, November 9, 2015, through Wednesday, March 2, 2016, were responded to in this document. Therefore, the total Draft EIR public review period for which the County received and responded to comments was 114 days (from November 9, 2015 to March 2, 2016).

The Notice extending the public review period was provided in both English and Spanish. Additionally, the Executive Summary of the Draft EIR was translated into Spanish and posted on the County's website for viewing and downloading. Hardcopies of the Spanish-translated Executive Summary and of the Draft EIR (in English) were made available at the Quartz Hill and Lancaster Libraries as well as the Los Angeles County Public Information Office. Newspaper advertisements of the extended comment period and second public meeting were placed in the following papers and ran on Monday, February 1, 2016:

- *Acton-Aqua Dolce News*: a weekly publication so the ad was available for 7 days
- *Los Angeles Daily News*: a daily publication
- *La Opinion*: a daily publication (the ad was in both English and Spanish)
- *Antelope Valley Press*: a daily publication
- *Antelope Valley Times*: an online publication

The second public meeting was held on Tuesday, February 9, 2016, at the Lancaster Public Library at 601 West Lancaster Boulevard in Lancaster, CA 93534 to present an overview of the proposed Project and the Draft EIR process and conclusions, and to invite submission of public comments on the Draft EIR. Real-time Spanish translation services were made available, as were copies of the NOA and the Executive Summary in both English and Spanish. This second public meeting had two attendees from the public. There were no requests for Spanish translation services at the public meeting.

CURB-2 (A Spanish translation of the CURB-1 letter)

Please see the response for CURB-1.



enlace



January 12, 2016

via hand-delivery and email

County of Los Angeles Chief Executive Office
Capital Projects/Debt Management Division
Attn: Mira Loma Women's Detention Center EIR
754 Kenneth Hahn Hall of Administration
500 West Temple Street, Los Angeles, CA 90012

Dear Chief Executive Office,

We are writing in response to the Draft Environmental Impact Report (DEIR) prepared for the Mira Loma Women's Detention Center Project (MLWDC), made available on November 9, 2015. After a thorough review, we believe that the DEIR neither adequately addresses the negative environmental impacts of the project, nor does it adequately consider possible alternatives to the proposed project that would significantly reduce environmental harms.

CRLA-1

A new jail in Lancaster will be severely detrimental to the health and wellbeing of LA County residents as well as destructive to the local environment. The EIR fails to adequately address many serious issues specific to the project site and surrounding area including Valley Fever, increased smog and traffic pollution, potential Native American resources, suitable energy sources, and water resources in the context of drought. In numerous instances, the DEIR fails to provide detailed explanations of how significant environmental impacts are reduced but instead only includes vague mitigation measures.

CRLA-2

Additionally, the DEIR fails to consider a comprehensive list of alternatives to the MLWDC project as required by CEQA. Objective A of the project states "To prioritize the on-site integration of gender-responsive female inmate education, treatment, and vocational training

CRLA-3

to reduce female inmate recidivism” (5-7), with reducing recidivism named as a primary objective (5-7). Many experts, including our organizations, have repeatedly pointed to reports and evidence based practices that illustrate how recidivism is greatly reduced through programs that employ alternatives to imprisonment. However, suitable out-of-custody alternatives that are being increasingly implemented across the state and country are not considered in this DEIR as project alternatives, despite the fact they would satisfy the same project objectives and undoubtedly produce less harmful environmental impacts.

CRLA-3

Please find attached a detailed list of comments addressing specific areas of the DEIR. We believe that our concerns with the inadequacy of this report, along with the detrimental environmental impacts of the MLWDC, are sufficient to warrant a rejection of the Mira Loma proposal on the basis that environmental impacts cannot be appropriately mitigated, and at the very least, a rewriting of the report to include missing analysis and information.

CRLA-4

Sincerely,
LA No More Jails Coalition
Critical Resistance Los Angeles
Californians United for a Responsible Budget
Dignity and Power Now
Dream Team Los Angeles
Enlace
Fair Change Project
Global Women’s Strike/LA
Immigrant Youth Coalition
Women of Color in the Global Women’s Strike
Youth Justice Coalition

cc: Board of Supervisors

ATTACHMENT 1

Who will monitor the design-build process to ensure any changes made are in compliance with CEQA Guidelines? What types of changes would warrant an addendum?

CRLA-5

What are the estimated costs of the proposed mitigation measures? Has the price tag for the jail increased? What are the total estimated expenses so far?

CRLA-6

What are future projects in the area and how will they impact the project site? How will future projects intensify significant impacts to the environment? Please list with detail all additional relevant policies and regulations in each topic area.

CRLA-7

4.1 AESTHETICS

Substantial adverse effect on a scenic vista:
The radio tower, when considered alone, may not significantly alter the view of scenic resources. However, its construction, which will likely require large machinery, may potentially significantly alter or block the view of scenic resources, particularly when compounded with the large water tower in the same viewshed.

CRLA-8

Mitigation of adverse lighting effects is proposed through MM AES-1, yet no details are provided. An EIR is required to contain “ways in which any adverse effects of such a project might be minimized” (PRC 21061). Because the specifics of a Lighting Plan are not provided, but only its intended mitigation, readers of the EIR are unable to assess the adequacy of such a plan and mitigation based on concrete data.

CRLA-9

4.2 AIR QUALITY

The report fails to address the long-term impact of Valley Fever to prisoners, personnel, visitors and neighboring residents (i.e., the homeless shelter). The long-term impact of Valley must be analyzed as the disease is endemic to Antelope Valley.¹ Recent findings in the article, “The Changing Epidemiology of Coccidioidomycosis in Los Angeles (LA) County, California, 1973-2011,” by Ramon Guevara of the LA Department of Public Health, should be considered in the final EIR. Findings include notable changes in the epidemiology of coccidioidomycosis in LA county started in 2004 and include significant increases in case numbers and incidence rates across various demographic categories and geographic areas, a sudden and substantial rise in female cases, and collectively more annual cases in the endemic areas, especially high case numbers and incidence rates in the Antelope Valley. The county should consult with Fugitive Dust and Health and Valley Fever Scoping Group in Antelope Valley.

CRLA-10

There is a Valley Fever “hot spot” close to the project site that requires further investigation into potential long-term impacts on people, e.g., prisoners and residents nearby. The report states that “The nine prisons and facilities identified by the CDCR as having a higher risk of exposure to Valley Fever do not include the California State Prison- Los Angeles County, located in the City of Lancaster, which is adjacent to the MLWDC Project site. As such, the CDCR has not identified the Lancaster area being a geographic location that requires screening or interventions for the State prison population with regard to exposure to Valley Fever.” Referring to CDCR’s list of high risk facilities is neither scientifically adequate nor does it have any analysis of the actual danger of contracting Valley Fever at the project site. As a counterexample, a severe and highly-publicized case of Valley Fever in California State Prison - Los Angeles County was reported on by Mother Jones this year.²

CRLA-11

Rather than mitigate the contraction of Valley Fever by sensitive receptors (i.e. prisoners, staff, visitors), the DEIR states that “because the majority of the Project site will be paved or landscaped, there are few opportunities for on-site soils to produce airborne dust...The operation of the MLWDC will follow standard LASD procedures for medical care and prevention with regard to health care for inmates in general, and Valley Fever specific all [sic] and will continue to coordinate with LACDPH (Masis 2015).” The report essentially and inadequately dismisses the very real possibility of Valley Fever contraction among sensitive receptors. Antelope Valley is a high wind area, meaning that infectious spores may become airborne from surrounding soils not considered “on-site.”

CRLA-12

The report fails to consider frequent clinical misdiagnosis of coccidioidomycosis cases.³ How will the project ensure proper diagnosis and treatment of Valley Fever?

CRLA-13

¹ <http://journals.plos.org/plosone/article?id=10.1371/journal.pone.0136753>

² <http://www.motherjones.com/environment/2015/01/valley-fever-california-central-valley-prison>

³ <http://publichealth.lacounty.gov/acd/docs/cocciRxarticle.pdf>

Analysis of motor vehicle pollutant fails to consider additional traffic necessitated by services contractors and/or vendors, e.g., laundry. Since the project site will not include a laundry site, how frequent will laundry services occur? Will this service be contracted? If so, with what company and where? How will the regular travel to the jail to pick up laundry impact additional pollutants from motor vehicles? What other vendors will the project require? How will regular visits by truck from service/delivery vendors to and from the jail impact air quality? What is the estimated vehicle mileage incurred by all delivery/service trucks in two weeks?

CRLA-14

“Air quality plan” is vague. Please provide examples of potential air quality standard plans.

CRLA-15

The report states that 44% of the site will be outdoors; 1.5 out of 46 acres will be outdoor recreational space. What are the long-term impacts of potential exposure to Valley Fever during outdoor recreational activities? Where will the imported soil (for garden beds) come from? The soil must be tested and the results of which should be included in the final EIR.

CRLA-16

What soil tests have been conducted on the project site for Valley Fever specifically? What were the findings? How many, if any, tests have been completed? Who conducted the test? Please include documentation of soil testing on the project site for Valley Fever in the final EIR.

CRLA-17

What are the potential impacts of increased pollutants on the health of prisoners? What mitigation measures will be provided during outdoor recreation?

CRLA-18

What are long-term mitigation measures for Valley Fever with regard to the soccer field, running track and other outdoor recreational area?

4.3 BIOLOGICAL RESOURCES

Page 155, 4.3-10

What are the few wildlife species expected to use the site? How will refurbishment of MLDC impact the habitat or movement of wildlife species?

CRLA-19

Describe in detail how the project will directly and indirectly impact nesting habitat for migratory birds. What are the migratory patterns of birds expected to occur, and what are proposed mitigations? When do active nests occur during the year? The project proposes to mitigate the loss of an active nest by requiring seasonal avoidance or pre-construction surveys for nesting birds. If the duration of construction is 35 months, how will the construction of this project avoid particular seasons? How will pre-construction surveys mitigate the indirect impacts of a 35 month construction period?

CRLA-20

How will MBTA regulations be enforced and monitored for compliance during the construction phase?

Page 154, 4.3-12

The project projects construction to begin in December 2016 for a duration of 35 months. MM BIO-1 prohibits removal of trees supporting roost sites during bat maternity roost season (March 1 to July 31). However, the demolition of bat maternity roosts will indirectly impede the use of wildlife nursery sites, as the colony will not be able to return to their nursery site.

CRLA-21

What are the ecological impacts of removing bat maternity roosts in the area? How will the removal of colonial and solitary roosts sites impact the regional population of the bat species?

MM BIO-1 is contradictory in that it calls for the complete removal of nests in order to mitigate the project's interference of wildlife movement. MM BIO-1 is not an appropriate nor effective in reducing the impact of removing occupied bat maternity roosts.

CRLA—22

Which program of the Los Angeles County Department of Public Works will be provided the results of the pre-construction bat habitat assessment? Will this be available to the public. I would recommend the county to include the details of this assessment in the final EIR.

CRLA-23

The name, credentials or institutional affiliation of the Biologist(s) conducting pre-construction surveys and assessments must be disclosed. We recommend the county to seek specifically a conservation biologist.

CRLA-24

MM BIO-2 proposes "an appropriate buffer zone" around an active nest if found. What exactly constitutes an appropriate buffer zone? Is there a standard determined by the American Institute of Biological Sciences? Will the standard be used? If not, why?

4.4. CULTURAL RESOURCES

Letters to native american consultations = appendix C-3
look at appendix C-2

Page 171, 4.4-10

The last paleontological resources record search was performed in 2008. The county must verify that no discovery of fossil localities have been recently recorded with the project site. These references must by updated by the NHMLAC.

CRLA-25

Page 172, 4.4-11

In assessing potential effects of Native American artifacts, BonTerra Consulting only received one response. It is not indicated whether follow up was made to the remaining six individuals, as recommended by the Native American Heritage Commission. The county must ensure that all the Native American tribes and individuals are consulted, not simply informed.

CRLA-26

Beverly Salazar Folkes informed us on December 8, 2015 that she never received the informational letter, dated February 3, 2014.

Page 180, 4.4-16

The determination of "non-contributor" to the historic designation of the Old Lock Building requires justification and further investigation. Built in 1946, it is located directly adjacent to Old Hangar 2. Its demolition potentially affects the historical significance of the site. Similarly, the Quonset Hut (built c. 1971) and Wooden Shed (built c. 1959), are also slated for demolition, but fall under the 45 year requirement for assessment as potentially warranting individual preservation as historic structures. These assessments are not provided. Additionally, demolition of these structures together for the creation of a parking lot will have a cumulative detrimental impact on the site's feeling, historic association, setting, and design.

CRLA-27

Page 182, 4.4-18

The name, credential and/or institutional affiliation of the Paleontologist retained by the county to monitor excavations must be disclosed.

CRLA-28

If a fossil resource is determined to be significant, any plan formulated by the paleontologist must be disclosed and detailed in the final EIR or an addendum.

What are the short-term and long-term impacts of excavation activities with regard to Valley Fever and fugitive dust? What are proposed mitigation measures for fugitive dust and exposure of Valley Fever during the excavation of native soils?

CRLA-29

MM CUL-1 and MM CUL-2 are not sufficient mitigation measures. All pre-construction assessments/surveys must be documented in the Environmental Impact Report (EIR) to ensure compliance with CEQA Guidelines. Archaeologists and paleontologists must conduct their evaluations and submit their findings as part of the final EIR. There is no third-party monitor to ensure compliance with CEQA after the final EIR is approved. The only option to ensure compliance is to complete pre-construction assessments prior to the completion of the final EIR.

CRLA-30

GEOLOGY AND SOILS

The report does not indicate if the soil has been tested for coccidioidomycosis (Valley Fever), lead, chemical, and other toxins. Please provide detailed and summarized results of soil tests conducted on the project site. The final report must also include the name, credentials and/or institutional affiliation of the soil specialist.

CRLA-31

Page 193, 4.5-4

How will continued drought conditions and further depletion of groundwater in the area affect the project site's susceptibility to liquefaction in areas of localized perched groundwater?

CRLA-32

Page 196, 4.5-7

Antelope Valley does experience very high winds from March through July. What are proposed mitigation measures to prevent fugitive dust and exposure of Valley Fever to the construction workers, scientific monitors, and the residents proximate to the project site during construction?

CRLA-33

Page 197, 4.5-8

Drought conditions and depletion of groundwater will continue; thus, subsidence will worsen causing damage to the foundation of the structure. How will the county propose appropriate mitigation measures given current and projected conditions? What are anticipated hazards for the prisoners residing in the jail should further subsidence occur? What are estimated operational costs for repair and maintenance of overlying structures, foundations and walls?

CRLA-34

The findings of a geotechnical investigation must be disclosed in the final EIR. The determination of "less than significant impact" must be justified in detail.

CRLA-35

GREENHOUSE GAS EMISSIONS

Page 211, 4.6-10

Water resource summary of general environmental effects of climate change does not include recent drought conditions and its exacerbation of reduced water supplies.

CRLA-36

Page 215, 4.6-14

The report states that "soil import and export are not anticipated for the Project," however, the raised garden beds for the project's on-site recreational activities "will be filled with imported soils derived from outside the Antelope and Kern Valleys" to prevent prisoners from interacting with local soil. The construction activity impacts are incorrect and must be updated in to include energy expended for soil import and export.

CRLA-37

Furthermore, the construction input data fails to account for the import of water for prevention of fugitive dust and exposure to Valley fever when breaking ground.

} CRLA-37

The construction input data fails to account for removal of hazardous waste.

The report states that “GHG emission-reduction measures for construction equipment are relatively limited.” This statement requires further justification/evidence. What is the inventory of construction equipment for this project? What are the average GHG emissions of each equipment?

} CRLA-38

Report states that construction will begin in November 2016. In other pages, December 2016 is the projected start date for construction.

} CRLA-39

The report concludes that a separate significance finding for construction emissions is not necessary. This requires further justification and the report must provide the threshold for construction annual GHG emissions.

} CRLA-40

Page 216, 4.6-15

If the design-build contractor requests an expedited schedule, the total GHG emissions would not be the same if project assumes at 5-day work week. The purported “offsetting decreases” are groundless assumptions that cannot be used to claim a reduction in total GHG emissions even if the number of work days increases. Total GHG emissions must be recalculated assuming a 6-day work week.

} CRLA-41

Failure to accurately include all operational GHG emissions (e.g., vehicle emissions from service/deliver truck) requires the estimated operational annual GHG emissions to be recalculated.

} CRLA-42

How was the operational annual emissions for each source area (energy, mobile, etc) calculated? How do these numbers compare to annual emissions of MLDC when it operated under Immigration and Customs Enforcement? Please provide the operational annual emissions of the facility when it was last used, and how the county determined input estimates for electricity, natural gas, water and solid waste.

} CRLA-43

The conclusion that total annual estimated GHG emissions for the project would result in less than significant GHG missions is not accurate. GHG emissions must be recalculated to include all input and output data.

} CRLA-44

Page 218, 4.6-17

The development of Project-specific ECRP must be created and disclosed in the final EIR to ensure compliance of mitigation. If the proposed measures of ECRP are not feasible, it is not appropriate to claim an overall reduction in GHG emissions.

} CRLA-45

PDF GHG-2 projects GHG emissions reduction with the placement of video-visiting stations at the Project site. However, it is erroneous to assume that in-person visitations will decrease with the availability of video visitations. There is no evidence to prove correlation; thus, the report cannot conclude a reduction in total GHG emissions based on this assumption. In fact, given the jail site’s proximity to different areas of Los Angeles and neighboring counties, one can conversely assume that family/friends, who may live in Antelope Valley or Kern County and could not previously visit their loved ones at CDRF due to the distance, will now frequent the jail.

} CRLA-46

PDF GHG-3 projects GHG emissions reduction by posting AVTA bus transit and Metrolink schedules. This is illogical and inappropriate to assume that simply posting transit schedules will encourage use of public transportation. This reasoning fails to account for an array of reasons for why people are unable to use public transportation. Moreover, it is irresponsible and deceptive to then claim definitively that there will be a reduction in total annual GHG emissions (and therefore no significant impact needs to be addressed).

CRLA-47

PDF GHG-4 proposes GHG emissions reductions by providing secure on-site bicycle storage for both staff commuting and visitors. Again, this is groundless. Simply setting up bicycle storage does not guarantee a reduction in VMT associated with vehicle travel. Therefore, the project cannot assume a reduction in overall annual GHG emissions. The project acknowledges uncertainty of staffing availability in Antelope Valley, and cannot claim definitively that staff commuting would live locally. Additionally, there is only one dedicated bicycle lane in the freeway and roadway system of the project; that is, the bicycle lane only on the east side of Valley Central Way. There are no proposals by the project, city or county to expand bicycle lanes in Lancaster or Antelope Valley.

CRLA-48

Given these contradictions, the Project must recalculate total annual GHG emissions without purported "offsetting decreases". The above comments challenge the report's finding that the project would have no impact on GHG emissions.

CRLA-49

The report fails to address how conditions of climate change will affect the project's water supply and impact on Los Angeles county's water supply. Additionally, the report does not address how the spread of Coccidioidomycosis will intensify with higher temperatures, drier land, loosened soil/sand and other environmental effects of climate change. Furthermore, the report states that the degrading quality of our air will increase the spread of infectious diseases and their vectors but does not consider Valley Fever as one such infectious disease. The environmental effects of climate change will exacerbate prominence of coccidioidomycosis which is already endemic to the project site. Women are particularly vulnerable, evidence in Dr. Ramon Guevara's article published September 2015. Therefore, the Project must thoroughly assess the potential health impacts on the women who would be forced to relocate to the project site.

CRLA-50

The project must assess the environmental effects of climate change on air quality, water supply and the spread of Valley Fever.

HAZARDS AND HAZARDOUS MATERIALS

Regarding the onsite underground storage tanks at the central plant that has failed leak detection tests and has not been corrected. There is not mitigation proposed to repair or remove this underground storage tank. It is possible that over time, with use or not, hazardous waste will continue to leak and potentially contaminate the soil and groundwater.

CRLA-51

Page 229, 4.7-8

Report states that when six older USTs at the MLDC were removed, contamination was found in the soil. The soil contamination was remediated. Which county department oversaw the remediation of the contaminated soil? Please disclose this information.

CRLA-52

Minor staining of the carpet and hydraulic oil on the concrete floors beneath the emergency generator were found in 2014. Despite this, the report states that no leaks were observed. What was the minor staining on the carpet and where did the hydraulic oil come from? What led the county to conclude that no leaks were observed despite staining and presence of oil.

CRLA-53

Regarding asbestos and lead sampling, the report must justify why Building 27-29 were not sampled. } CRLA-54

Please attach the "Closure Certification" letter issued by LA County Department of Public Works (LACDPW) to the property on May 22, 2008 to the appendix of the final environmental impact report. } CRLA-55

This section describes the project site as "the southern and eastern sections of the larger MLDC property are included in the 46-acre Project site, with older structures that were part of the Polaris Flight Academy at the northwestern section *generally not part of the Project site.*" Was the "northwestern section" of the project site, which includes the older structures of the Polaris Flight Academy, tested for hazardous waste and/or materials? The entire project site, including older structures that will be torn down during construction and the Polaris Flight Academy, must be tested for hazards and hazardous materials. The results of said tests must be detailed and summarized in the final report. } CRLA-56

Page 230, 4.7-9

The report states that the facility was cited, in June 2013, by the Los Angeles County Fire Department because the generator and USTs did not have current permits. The report does not state if and how the project will seek to update permits for hazardous wastes and generators. } CRLA-57

The report is contradicting in that it states on page 4.7-8 that "no leaks were observed" in 2014, however, on page 4.7-9, the report indicates that "the UST at the central plant also failed leak detection tests in 2013." In addition, on page 4.7-11, the report states that "two USTs at the fueling station were found...to have failed leak detection tests in 2013." The report does not propose repair and/or removal of these leaking USTs. } CRLA-58

Pg 232, 4.7-11

The report notes that two USTs at the fueling station were found to not have current permits and have failed leak detection tests. There are no proposed mitigations to update permits. } CRLA-59

What are the hazardous implications of the two hydraulic hoists observed in the vehicle service garage? } CRLA-60

The report states that there is a possibility for soil and groundwater contamination if hazardous materials are not properly dealt with. Has the project already tested the soil for contamination? If so, the report must include detailed and summarized results. } CRLA-61

Has the project already tested the groundwater for contamination? Given that, at the very least 3 USTs have failed leak detection tests without remediation since 2013 and 2014, it is necessary to test both soil and groundwater for contamination. The results of soil and groundwater tests for contamination must be included in the final report. } CRLA-62

Page 235, 4.7-14

What is SWPPP? What are all the requirements of preparing and implementing an SWPPP? Will the results of the SWPPP be disclosed in the final report? If not, why? } CRLA-63

The report must describe in detail the proposed mitigation of storm water discharge. It is not sufficient to simply list the requirements of NPDES Construction General Permit. The final } CRLA-64

report must include detailed proposed mitigation for preventing hazardous wastes and/or pollutants from being discharged in storm water.
The project fails to provide mitigation measures for the impact of transporting and disposing of hazardous waste on the neighboring residents and larger community.

CRLA-65

The emergency generator at the central plant and beneath the hole punch machine in the George Barracks must be further investigated for toxic leaking and the proximate area must be analyzed for contamination.

CRLA-66

The report fails to comprehensively analyze the potential long-term operational impacts of transporting, disposing and/or handling hazardous materials on the prisoners that would reside on the project site and nearby residents.

CRLA-67

Page 236, 4.7-15

The report fails to mitigate the potential impact of utilizing, transporting and/or disposing hazardous materials during construction/demolition on nearby residents.

All buildings on the MLDC property must be sampled for asbestos. If asbestos is found, then materials containing asbestos should be handled, removed, transported and disposed of in compliance with existing regulations. By conducting tests on all buildings on the MLDC property, i.e. project site, the Project would render MM HAZ-1 unnecessary.

CRLA-68

Page 237, 4.7-16

The claim that “intact painted surfaces do not require stabilization prior to renovation/ remodeling or demolition” must be justified. If intact painted surfaces contains any lead content, mitigation measures for operational impact must be proposed.

CRLA-69

All buildings on the MLDC property must be sampled for lead. MM HAZ-2 is not a sufficient mitigation measure as it does not comprehensively describe the process preventing exposure to lead-based paint for construction workers and neighboring residents, whom might be impacted during demolition/construction.

MM HAZ-1 is not a sufficient measure to mitigate the significant impact of the presence of released asbestos fibers where prisoners would be exposed on a daily basis. The development of an “O&M” that requires periodic observation, inspection and documentation does not mitigate the potential exposure and detrimental health impacts on prisoners that would be exposed on a daily basis. The buildings that have been tested for ACM and have potential for airborne asbestos fiber release must be removed to ensure the safety and health of prisoners forced to reside at the project site. MM HAZ-1 also failed to adequately address the exposure of asbestos fibers where damaged ACMs have occurred.

CRLA-70

Page 238, 4.7-17

Regarding off-site impacts, the proposed mitigation, RR HAZ-5, fails to adequately address the potential impact of use, storage, disposal and transport of hazardous materials/wastes during construction on off-site infrastructure. Simply notifying owner/operators of such infrastructure would not mitigate potential damage to high priority lines.

CRLA-71

The report notes that an elementary school has been proposed on Lancaster Boulevard, east of 50th Street West in 2010. The report fails to indicate if this elementary school, which would be 0.70 miles away from the project site, has been constructed and if it is in operation.

CRLA-72

The report fails to adequately mitigate the impact of potential emission of hazardous materials, substances or waste on nearby residents, namely, the homeless shelter (GRACE) which is less than 0.25 miles away from the project site.

} CRLA-73

Page 239, 4.7-18

The report states that the Polaris Flight Academy, which is within/near the project site/MLDC property, has a status of “inactive-needs evaluation” as of 2005, however, no evaluation is proposed to update the status. The potential contaminants of the Polaris Flight Academy must be investigated and reported in the final EIR with appropriate mitigations. The county must work with the Defense Environmental Restoration Account (DERA) and the DTSC to evaluate the site as significant hazards may be identified.

} CRLA-74

The soil sampling and analysis completed at 14 locations are not specific enough. Please indicate where soil sampling and analysis occurred on the project site. Regarding these specific samplings, what was tested for? Please list all toxins, chemicals, and/or hazardous waste that these samplings tested for.

} CRLA-75

Concentrations of TPH in the diesel and/or oil ranges must be investigated and the hypothesis that elevated concentration samples resulted from overlying asphalt surface over must be further justified.

Test and analysis of concentrations of total petroleum hydrocarbons (TPH) must be justified in the final report.

The potential impacts of elevated TPH concentration detected at locations M1 and M10 on prisoners and personnel must be further investigated. Any claim that minimal exceedance would not pose a threat to the health of prisoners and employees must be justified. The proposal to cover contaminated soil so that exposure pathways are prevented must be detailed and considered in relevant areas (i.e., greenhouse gas emissions, geology and soil, etc). The claim that TPH concentrations would not present a significant risk to occupants require further justification as the proposal to lay asphalt is not included in other sections of the report.

} CRLA-76

Page 240, 4.7-19

The report must analyze the impact of moving 1600+ people to the project site when MLDC is listed in government databases as a hazardous waste generator, and proposed mitigations do not include any reparation or removal of existing hazards materials and waste.

} CRLA-77

The failure to remove or repair the UST that has failed leak detection tests does not adequately mitigate potential health impacts on the prisoners and employees and environmental impacts on and near the project site.

} CRLA-78

The impacts related to past hazardous materials use at the site are not adequately mitigated. Further justification of the report’s finding that it would be less than significant is required.

} CRLA-79

The report’s finding that the “vehicle fleet garage” is not a part of the project site and therefore requires no mitigation is not sufficient. The vehicle fleet garage is on the property of MLDC, of which the project site is also included, is within reasonable proximity of the project site and justifies further investigation and appropriate mitigations to prevent environmental and health impacts. In other words, the soil beneath the pits of the hydraulic hoists must be tested, analyzed and appropriate mitigation must be proposed in the final report.

} CRLA-80

Page 242, 4.7-21

The report indicated that the helipad will remain in place at the northeastern corner of the Project site and its use is anticipated by the Sheriff's Department helicopters. The potential for fugitive dust is anticipated with helicopter use, however, potential impacts are not studied nor recognized.

CRLA-81

4.8 HYDROLOGY AND WATER QUALITY

Regarding the adjudication of groundwater rights, how might the outcome affect water supply for the proposed jail? What are the associated costs? Will the proposed jail contribute to further overdraft of groundwater in LA County, not just Antelope Valley? What is the well flow rate, well yield, water quantity and rate of replenishment of LA County Waterworks District 40 water line and Antelope Valley-East Kern Water Agency (AVEK)?

CRLA-82

The impact on Waterworks District 40 water line and supply must be considered in light of drought conditions. The entire county, not just Antelope Valley and underlying groundwater sources, is in a state of overdraft. What is the impact of this project on the water supply of Waterworks District 40 and AVEK?

CRLA-83

The historic well production statistics are outdated. The intensification of drought conditions in recent years (post 2012) warrants an updated study.

CRLA-84

How do they monitor compliance during construction? For example, the report states that compliance with NPDES Construction General Permit would ensure the project does not violate water quality standards, but during the construction process, how will water quality standards be monitored?

CRLA-85

The report states that increased storm water runoff could result in erosion if site improvements are not conducted in compliance with regulations. What third party monitor will be in place to ensure compliance during construction and operational use?

What are the associated costs with a new drain system?

CRLA-86

The report states that the project will not use groundwater supplies for long-term operations. Imported and recycled water is proposed as an alternative. What are the long-term impacts of importing water on traffic and air quality? Where will the recycled water come from? Are there safety and hygiene concerns with using recycled water?

CRLA-87

Construction and disturbance of soil will occur before the new water pipeline is completed. Spraying the ground with water is proposed as a mitigation measure for Valley Fever during construction. What water supply will be used during construction?

CRLA-88

Page 263, 4.8-14

The project proposes to use on-site water wells for water needed during construction activities and dust control. However, the report claims that no significant impact will occur because the water used during construction will replace "existing water use from minor maintenance and security activities." What are the existing water use from minor maintenance and security activities? And will that water use continue during construction? If so, the report is inaccurately in its determination that impacts to groundwater supplies or recharge would be less than significant.

CRLA-89

What are current groundwater supplies and recharge rate for groundwater supplies of the Antelope Valley Groundwater Basin? How will use during construction impact groundwater supplies and recharge rate? } CRLA-89

The report does not accurately assess the amount of the water required for construction activities and dust control. The report must analyze every construction activity that would require the use of water (e.g. spraying down exposed soil where new buildings are proposed). The sum of this assessment must also be considered in analyzing the overall GHG emission rate of the overall project, and outlined in the final report. } CRLA-90

What is the estimated cost of developing a new on-site storm drain system? } CRLA-91

Page 269, 4.8-19
The report states that the project does not propose the use of groundwater supplies for long-term operations therefore would not contribute to the depletion of local groundwater supplies. However, the report fails to analyze the current and projected groundwater supplies of the Antelope Valley-East Kern Water Agency and the project's impact on said groundwater supplies. } CRLA-92

4.11 POPULATION AND HOUSING

Are growth projections reconciled with environmental impacts? For example, Table 4.11-6 projects an increase of ~20,000 people in 2020 (from 2008) – is this projected population considered in the long-term analysis of water usage in Lancaster? } CRLA-93

Jobs at the jails are not the type of job creation that the community needs. What percentage of the unemployed population in Lancaster would qualify as an employee of the sheriff's department? } CRLA-94

4.12 PUBLIC SERVICES AND RECREATION

Page 4.12-3
The report states “neither the project site nor the city of Lancaster is located within areas identified to have “very high fire hazard severity.” However, in the Hazardous Waste section, the report claims that the project site is at least 4.5 miles from the edge of an area determined to be “very high fire hazard severity.” } CRLA-95

Outdoor recreation area is required for detention facilities. However, no mitigation measures have been proposed for the outdoor recreational space (soccer field, running track and gardening areas) and potential exposure to Valley Fever and poor air quality. } CRLA-96

It is not indicated whether the full-sized sports court for volleyball and basketball is outdoor or indoor. } CRLA-97

4.13 TRANSPORTATION AND TRAFFIC

The report includes a very limited assessment of traffic, i.e. the report only analyzes increased traffic from visitors and fails to include increased traffic from regular service/delivery trucks and vendors. The report inappropriately mitigates projected increase in traffic by proposing the use of video visitation. } CRLA-98

The project site is not easily accessible by public transportation, creating further obstacles for families to visit loved ones inside the jail. The project does not propose an increase in } CRLA-99

frequency of bus routes from LA to Lancaster, nor does the project propose additional bus stops or routes near the project site.

} CRLA-99

There is only one bicycle lane on one road near the project site. There are no proposed bikeways to facilitate transportation to the site.

} CRLA-100

In total, the project fails to propose meaningful alternatives to the increased distance from families of people inside the jail. The increased distance for some family members would negatively impact the post-release success of individuals.

} CRLA-101

The way visiting is described in this report and the way visiting was described in the Women's Program Model for Mira Loma (reference Feb 2014 Sheriff's Education Based Incarceration Bureau) are in conflict. The Program Model laments that the existing jails do not provide for contact visiting – implying that Mira Loma will. The Program Model also states that the Sheriff's Department would provide bus service for visitors (but limits that service to children and their guardians). However, in this report, it is proposed that this project not only encourages but assumes video visitations as the primary form of visitation. In addition, there is no proposal in this report that includes a bus service for visitors.

} CRLA-102

2.2.3 CRITICAL RESISTANCE LOS ANGELES ET AL. (CRLA)

January 12, 2016

CRLA-1

This comment provides a general introduction to the comment letter and alleges a failure to address environmental impacts and alternatives to the Project. The Draft EIR for the proposed Project has been prepared in accordance with the California Environmental Quality Act (CEQA, *California Public Resources Code*, Sections 21000 et seq.) and the State CEQA Guidelines (*California Code of Regulations* [CCR], Title 14), and addresses the potential direct, indirect, and cumulative impacts of the Project on all environmental issue areas. Section 5.0, Project Alternatives, was prepared in accordance with Sections 15126.6(a) through 15126.6(f) of the State CEQA Guidelines. As demonstrated throughout the Draft EIR, all potentially significant impacts have been reduced to levels that are less than significant through the identified mitigation measures, and no significant unavoidable environmental impacts would result from Project implementation.

CRLA-2

This comment alleges that a new jail will be detrimental to the environment and residents of Los Angeles County. Although the Project site has been unoccupied since 2012 as discussed in Section 2.0, Environmental Setting, the Project site has generally been in operation and providing various detention/jail functions since 1945–1946, when the California Youth Authority began to run a vocational school for juvenile offenders at the site. In the mid-1950s, the MLDC operated as a medium-security facility until it ceased operations for the first time in 1979. It reopened in 1983 and was expanded with the construction of several new buildings in 1986. The facility was repurposed for female inmates and was known as the Mira Loma Female Honor Ranch, but was closed again in 1993. The MLDC reopened for use in 1997 by the U.S. Immigration and Customs Enforcement (ICE) to house undocumented immigrants until their immigration cases were decided, and it operated in that capacity until 2012. The site has not housed inmates since that time. The MLWDC Project proposes the adaptive reuse, renovation, and expansion of the majority of the buildings at MLDC, which is an existing County asset. The redevelopment of the property as the MLWDC would avoid the costs associated with constructing a new facility.

Sections 4.1 through 4.15 of the Draft EIR provide analyses of environmental effects that could impact residents in Los Angeles County and others by Project implementation. Each of the environmental issues listed in the comment are fully analyzed in the Draft EIR. Valley Fever and the generation of criteria pollutants (i.e., carbon monoxide [CO]; nitrogen oxides [NOx]; volatile organic compounds [VOCs]; sulfur oxides [SOx]; respirable particulate matter less than 10 microns in diameter [PM10]; and fine particulate matter less than 2.5 microns in diameter [PM2.5]) are discussed in Section 4.2, Air Quality. Native American resources are discussed in Section 4.4, Cultural Resources. Energy demands and sources are discussed in Section 4.15, Energy. Additionally, a Water Supply Assessment was prepared for the Project and is included in Appendix G-2 of the Draft EIR; this is summarized in Section 4.14, Utilities and Service Systems. The mitigation measures (MMs) presented in the Draft EIR are prepared in compliance with Section 15126.4 of the State CEQA Guidelines. This Final EIR, including all comments submitted to the County on the Draft EIR, will be provided to the County of Los Angeles Board of Supervisors. Therefore, your concerns will be presented directly to the decision makers prior to consideration of Project approval.

CRLA-3

This comment alleges a failure to consider a comprehensive list of alternatives to the Project, including alternatives to incarceration and out-of-custody alternatives. The Draft EIR in fact addresses alternatives in accordance with CEQA and the State CEQA Guidelines. As demonstrated in Section 5.0, Project Alternatives, an EIR must describe a range of reasonable and of potentially feasible alternatives to the proposed Project, or to the location of the Project, which would feasibly attain most of the basic Project Objectives but would avoid or substantially lessen any significant effects. Based on the analyses in Sections 4.1 through 4.15 of the Draft EIR, the proposed Project would result in significant environmental effects prior to mitigation on a number of environmental topics. Following mitigation, however, impacts to all of these topical areas would be avoided or reduced to less than significant levels with the implementation of mitigation measures. No significant and unavoidable impacts would occur with the Project.

Additionally, an EIR is not required to consider alternatives that are infeasible. The range of alternatives is governed by a “rule of reason” that requires discussion of only those alternatives necessary for the County of Los Angeles Board of Supervisors (Board) to make a reasoned choice. As demonstrated in Section 3.0, Project Description, on October 22, 2013, the Board authorized the evaluation of a proposal to use a portion of the Mira Loma Detention Center (MLDC) property as the site for a female detention facility in lieu of the Pitchess Detention Center (PDC) site previously proposed. In May 2014, the Board directed that “Option 1B” be studied, as recommended in the *Los Angeles County Jail Plan Independent Review and Comprehensive Report* (Jail Plan Report). Option 1B recommended continued evaluation of renovating the facility at MLDC for a women’s detention center. The Draft EIR has been prepared to evaluate the environmental impacts of pursuing the proposed Project, in compliance with this Board of Supervisors directive.

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 this Project. Therefore, the proposed Project is consistent with the Board of Supervisor’s consideration of policy issues addressing alternative approaches to incarceration, including out-of-custody alternatives.

The Board of Supervisors has adopted numerous recent actions to reduce the number of people who are incarcerated in Los Angeles County, particularly those with mental illness and/or substance use disorders. The Board of Supervisors’ 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 in a document entitled “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”.

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 Countywide Criminal Justice Coordination Committee. All Advisory Board members participated in the Countywide 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 of Los Angeles Chief Executive Office (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 Re-Entry (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 of Supervisors determined the Office will be a part of the Department of Health Services and the Director of the Office will report to the Director of the Department of Health Services. The Director of this Office will be 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 will oversee Countywide 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 of Supervisors directed that future budget allocations be a part of the annual budget process. On September 1, 2015, the Board of Supervisors also directed that the Office distribute funding so at least 1,000 individuals would be diverted across all intercept points within the criminal justice system.

The Criminal Justice Mental Health Advisory Board report of August 2015 concluded that, even with increased opportunities for diversion from a jail environment, there will still be a need for mental health treatment in jails and that diversion efforts can reduce, but will not eliminate, the need for the County to operate detention facilities (LACDA 2015). In light of the County's diversion efforts, the Board of Supervisors directed that, for purposes of ongoing study and evaluation in the environmental review process, the maximum size of the proposed women's detention center at Mira Loma in Lancaster would remain at 1,604 beds. In addition, the Board of Supervisors reduced the maximum proposed size by approximately 1,000 beds, for purposes of the environmental review of a separate proposed treatment and detention center addressing needs of incarcerated men and women with mental illness and/or substance use disorders at the site of the current Men's Central Jail in downtown Los Angeles. In summary, the Board of Supervisors has taken steps to reduce the number of people who are incarcerated in Los Angeles County.

The Draft EIR Section 5.0, Project Alternatives, was prepared in accordance with Sections 15126.6(a) through 15126.6(f) of the State CEQA Guidelines and adequately considers alternatives to the proposed Project. Out-of-custody alternatives were not required to be analyzed

in the Draft EIR beyond the No Project alternative analyses and they would not be able to achieve the Project's primary goal, as stated below and in Section 5.3.2 of the Draft EIR.

The Project's goal is to provide detention facilities for low- to medium-security level female inmates that meet modern correctional standards and that prioritize the on-site integration of gender-responsive female inmate education, treatment, and vocational training. This goal focuses on providing a secure detention facility with cost-effective therapeutic and rehabilitative programs to meet needs of eligible female inmates in order to reduce recidivism.

Potential environmental impacts associated with "no action" on the proposed Project are described in Alternative 1A, No Project/Continuation of Existing Operations, and Alternative 1B, No Project/Predictable Actions, as demonstrated in Section 5.0, Alternatives. These alternatives provide information regarding the potential impacts to the environment if the County does not move forward with the proposed Project. This Final EIR, including all comments submitted to the County on the Draft EIR, will be provided to the County of Los Angeles Board of Supervisors. Therefore, your concerns will be presented directly to the decision makers prior to consideration of Project approval.

CRLA-4

This comment provides a general concern that the Draft EIR is inadequate. Responses to the detailed list of comments are provided below, beginning with the response for the comment marked CRLA-5.

CRLA-5

The mitigation measures (MMs) are set forth throughout the Draft EIR and are included in Table ES-2 in the Draft EIR Executive Summary. Each MM includes a requirement for the timing of the implementation, as well as the required monitoring agency. This information is further documented through the Mitigation Monitoring and Reporting Program (MMRP) that is included in the Final EIR package that is presented to the Board for their review and consideration.

Section 15164 (a) of the State CEQA Guidelines states that an addendum to a previously certified EIR must be prepared if changes or additions are needed to the EIR, but none of the conditions in Section 15162 requiring a subsequent EIR have occurred. The conditions that would allow preparation of an addendum include changes to the project or the circumstances under which project would be implemented that do not require major revisions to the previous EIR or that would not result in new significant environmental effects or an increase in the severity of the identified significant effects. When new information becomes available but would not change the significant effects of the project, would not increase the severity of the impacts of the project, or would not make new mitigation measures or alternatives feasible, an addendum may also be prepared. Otherwise, a subsequent EIR or a supplement to an EIR may be needed.

CRLA-6

The estimated costs for building the proposed MLWDC from design to occupancy are presented in Item S-1 of the June 9, 2015, presentation to the Board of Supervisors on jail planning. In this presentation, the proposed MLWDC Project is shown to cost approximately \$123.4 million, and the costs are broken down into Assembly Bill (AB) 900 Grant Contribution, net County cost, and other funding sources. These preliminary costs include the costs associated with the mitigation measures included in the Final EIR. An updated total Project cost estimate will be prepared for

the Board of Supervisors for their consideration at the time the Final EIR and the proposed Project recommendations are presented to them for consideration. The 2015 document can be viewed at the following website: <http://file.lacounty.gov/bos/supdocs/94070.pdf>.

CRLA-7

Table 2-1, City of Lancaster Cumulative Projects, and Table 2-2, County of Los Angeles Cumulative Projects, in Section 2.0, Environmental Setting, presents a listing of projects that could potentially contribute to impacts from the proposed Project, resulting in cumulative impacts. Cumulative impacts are assessed under a stand-alone heading within each Draft EIR Section (i.e., 4.1 through 4.15). Regulatory Requirements (RRs) are also included within each Draft EIR Section (i.e., 4.1 through 4.15) and include applicable local, State, or federal regulations that are required independently of CEQA review and also serve to prevent the occurrence of, or reduce the significance of, potential environmental effects. Typical RRs include compliance with the provisions of the California Building Code, Antelope Valley Air Quality Management District (AVAQMD) rules, local agency requirements, and other regulations and standards. RRs are identified in the MMRP for convenience of tracking.

CRLA-8

The short-term construction impacts of a radio communications tower would not significantly affect scenic resources or result in a significant aesthetic impact. The Project site is currently vacant and there would be no site occupants to be affected by construction activities. Construction of the tower would require approximately two weeks/14 days of crane operations, which is the only piece of machinery that would be visible above the rooflines of adjacent structures. An important consideration is not just whether the crane is visible, but whether it would result in a "substantial adverse effect" on scenic views. A crane is a narrow structure with a thin profile that would not hide or inhibit views of distant mountains. Short-term deployment of construction-related equipment is a common occurrence and is generally understood to be a temporary visual inconvenience. As demonstrated in Section 4.1, Aesthetics, the Project site has an institutional character due to the utilitarian nature of the facility, which is exemplified by the security fencing with barbed wire that separates various sections of the site, tall exterior flood lights, internal paved roadways and parking areas, security watch towers, and an aboveground water tank. The temporary presence of construction-related equipment would not significantly alter or block the views of scenic resources.

CRLA-9

As stated in Section 15126.4(b) of the State CEQA Guidelines, MMs may specify performance standards that would mitigate the significant effect of the project and that may be accomplished in more than one specified way. There are many ways to design exterior lighting to avoid spillover, including adjustments to heights, angles, wattage, filters, and other modifications. As such, MM AES-1 includes the performance standard of requiring that properties with sensitive receptors not be significantly adversely affected by light spillover onto properties with sensitive receptors, while also ensuring that lighting levels meet the security requirements for the MLWDC. Compliance with this standard through the provision of a Lighting Plan is subject to the review and approval of the Los Angeles County Director of Public Works prior to the commencement of any on-site or off-site demolition/construction activities.

CRLA-10

This comment alleges a failure to address the long-term impact of Valley Fever to on-site inmates and individuals living and working in the Project area. Coccidioidomycosis, also known as Valley Fever, and its potential impact on potential future inmates and County staff is discussed in Section 4.2, Air Quality. A summary of hazards associated with the fungus is provided in the Draft EIR and includes summaries of trends related to Valley Fever in Los Angeles County, as inventoried and reported by the Los Angeles County Department of Public Health (LACDPH), which was consulted during the preparation of the Draft EIR.

The commenter references *The Changing Epidemiology of Coccidioidomycosis in Los Angeles (LA) County, California 1973–2011*, co-authored by Ramon Guevara, Tasneem Motala, and Dawn Terashita, MD, MPH of the Los Angeles County Department of Public Health. Dr. Terashita has consulted with County staff on the issue of Valley Fever during preparation of this EIR. This reference has been reviewed and it provides an analysis of the incidence rate of Valley Fever in Los Angeles County, including discussion of the Antelope Valley, and describes the trend of increasing cases through 2011. This information is augmented in the Section 4.2, Air Quality with more recent data, as published in the LACDPH *2013 Annual Morbidity Report*. Information presented in the referenced report is consistent with information provided in the Draft EIR.

The Draft EIR includes an analysis of exposure hazards due to fugitive dust that may result from construction-related earth-moving activities, and identifies several Project Design Features (PDFs) and regulatory requirements (RRs) to minimize any exposure risks. PDF AIR-1, which will be included in the Contractor's Specification and monitored through the MMRP, requires the distribution of materials on Valley Fever, or any updated materials as applicable, to worksite supervisors and construction workers. PDF AIR-2 and RR AIR-1, which will be included in the Contractor's Specification and monitored through the MMRP, requires compliance with Best Management Practices and AVAQMD Rule 403 for the prevention of fugitive dust and nuisance air contaminants. RR AIR-1 provides a listing of the most applicable AVAQMD Rules. Rule 403, Fugitive Dust, requires measures such as watering and control of track-out from the site, as well as submittal of a Dust Control Plan prior to the start of construction. Rule 403 requires control of fugitive dust and avoidance of nuisance, and Rule 402 prohibits the emission of quantities of air contaminants that could cause injury, detriment, nuisance, or annoyance to the public, or that endanger the comfort, repose, health or safety of the public. With implementation of RR AIR-1, on-site earthmoving activities would not result in fugitive dust that could affect adjacent off-site land uses.

As stated in RR AIR-2, the Project will be constructed in compliance with the Department of Health – Infection Control Policy Guidelines Procedure No. 918.01. Policy 918 is intended to prevent the spread of diseases that may be caused by construction-induced airborne pollution in susceptible individuals (patients, staff, and the public) in Department of Health Services (DHS) facilities. The protocols and requirements mandate the designation of an Infection Control Coordinator who must review and approve infection-control plans for new construction or renovation projects to ensure a safe environment. These infection-control plans must include infection-control measures to contain dust, debris, and other elements and to protect the patients, employees, and visitors in this environment. The Infection Control Coordinator has independent authority to stop construction-related activity immediately when the public may be adversely affected by infection-control hazards generated during construction-related activities and when the infection-control precautions and/or engineering controls are inadequate to contain the hazard. As such, the Draft EIR states that exposure to Valley Fever during construction activities would be the same as exposure to dust, and, thus, should follow the requirements for the mitigation of dust. Impacts would be less than significant, and no mitigation is required.

Section 4.2, Air Quality, acknowledges that the future inmate population has the potential to be exposed to dust generated from soils in the Antelope Valley, which have the potential to contain *Coccidioides* spores (i.e., the fungus that causes Valley Fever). As discussed in Section 3.0, Project Description, of the Draft EIR, according to the Sheriff's Department, AB 109 female inmates are serving an average of 423 days in custody from sentencing date to release date, while non-AB 109 female inmates serve an average of 107 days in custody. Therefore, the length of time that inmates would be living at the MLWDC is temporary, and is not equivalent to a permanent living circumstance or the longer sentences in state prisons that house higher-security inmates.

The Draft EIR summarizes the LACDPH 2013 *Annual Morbidity Report*, which presents the recent trends related to Valley Fever in Los Angeles County, including an increasing incidence rate for reported coccidioidomycosis cases in the last ten years, which has doubled in the past five years. However, the overall incidence rate in the Antelope Valley was not determined to warrant changes in the County's protocol for disease prevention, notwithstanding the fact that the County health and public health officials are well educated on the condition; are familiar with its incidence in the County and elsewhere in the state and are involved in research and education on the subject of Valley Fever.

The LACDPH has not identified the previous U.S. Immigration and Customs Enforcement (ICE) detainee population at MLDC, the future inmate population at MLWDC, or earlier occupants at the HDHS MACC (the adjacent hospital facility, which has relocated in Lancaster) as requiring the implementation of health screening protocols or other measures to address potential Valley Fever exposure.

Also, as demonstrated in Section 4.2, Air Quality, the California Department of Corrections and Rehabilitation (CDCR) determined the State prison facilities that are located in the geographic area where Valley Fever has been reported to be most common are: Avenal State Prison (ASP) in Kings County; Substance Abuse Treatment Facility (SATF) in Kings County; California State Prison-Corcoran (COR) in Kings County; Pleasant Valley State Prison (PVSP) in Fresno County; California Correctional Institution (CCI) in Kern County; Kern Valley State Prison (KVSP) in Kern County; North Kern State Prison (NKSP) in Kern County; and Wasco State Prison in Kern County (WSP). In 2011, 535 of the 640 reported Valley Fever cases within the CDCR (approximately 85 percent) occurred at ASP and PVSP (U.S. District Court 2013). The prisons and facilities identified by the CDCR as having a higher risk of exposure to Valley Fever do not include the California State Prison-Los Angeles County, located in the City of Lancaster, which is adjacent to the MLWDC Project site. As such, the CDCR has not identified the Lancaster area as being a geographic location that requires screening or interventions for the State prison population with regard to exposure to Valley Fever (CDCR 2013).

As discussed with the Sheriff's Department staff for the preparation of the Draft EIR, the operation of the MLWDC will follow standard Sheriff's Department procedures for medical care and prevention with regard to health care for inmates in general, and Valley Fever specifically, and the Sheriff's Department will continue to coordinate with LACDPH (Masis 2015). The LACDPH is the designated County agency with the mandate to protect health, to prevent disease, and to promote the health and well-being of all persons in Los Angeles County. As such, any future changes in LACDPH policies that may be made regarding Valley Fever for inmate populations will be implemented, as applicable, throughout the County jail system.

Because the future inmate population's exposure to disturbed soils would be limited to gardening activities, PDF AIR-3 in Section 4.2, Air Quality, states that the Project will import gardening soils from outside of the Antelope Valley, which would be used in raised planting beds to remove

gardening in native soil as a potential source of exposure to Valley Fever spores. Further, outdoor recreational areas would be covered with landscaping, turf grass, gravel or landscaping/wood chip ground cover that would minimize the opportunity for soils to become airborne.

The Antelope Valley has not been identified by the LACDPH, the AVAQMD, or any other governmental health agency as a region that should be avoided by the elderly, women, children, health-compromised individuals, or by any specific ethnic groups. The Antelope Valley includes the major population centers of the cities of Lancaster and Palmdale, which have an estimated 2014 combined population of approximately 314,902 people. This portion of the Antelope Valley includes a diverse population of residents that includes many individuals that could be considered to be at higher risk of complications due to infection from Valley Fever spores. As stated in Section 4.2, Air Quality, persons at the highest risk of developing disseminated Valley Fever include the very young (under 1 year old); adults over 60 years; immunocompromised individuals; people with diabetes; women in the third trimester of pregnancy; and certain ethnic groups, including African-Americans and Filipinos.

The demographics of the two cities include approximately 158,605 females (50.4 percent) and 156,297 males (49.6 percent) with a median age of approximately 30.7 years old. The racial/ethnic composition of the area is approximately 47 percent Latino, 29 percent white, 17 percent African American, and 4 percent Asian (U.S. Census Bureau 2016). As such, the temporary presence of a female inmate population into the Antelope Valley would not introduce a new or unusual demographic into the area that is not already present in the existing population of the region.

The MLWDC property is not located in an area determined to be hazardous to the health of local residents or visitors to the region. The Draft EIR concludes that the potential future inmate population's temporary placement into the Antelope Valley, which includes the inmates' participation in all indoor and outdoor activities at the MLWDC, would not constitute placement into a hazardous existing environmental setting that would require mitigation. Additionally, the operation of the proposed Project would not increase the prevalence of Valley Fever spores or otherwise exacerbate an existing environmental condition.

The LACDPH representatives participate in various community focus groups including the Fugitive Dust Group, California Cocci Collaborative, and Centers for Disease Control's (CDC's) Cocci Public Health Working Group in order to stay abreast of current information and resources surrounding the condition.

CRLA-11

The commenter states that there is a "hot spot" of Valley Fever near the Project site, and the source information for this comment is assumed to be *The Changing Epidemiology of Coccidioidomycosis in Los Angeles (LA) County, California 1973–2011*, co-authored by Ramon Guevara, Tasneem Motala, and Dawn Terashita of the LACDPH discussed above in the response for CRLA-10. Section 4.2, Air Quality, includes an overview of the LACDPH *2013 Annual Morbidity Report*. Data included in this report show the incidence in Valley Fever in Service Planning Area (SPA) 1 (i.e., Antelope Valley) from 2009 to 2013. The number of incidents of Valley Fever infection spiked in 2011 in SPA 1 with 93 reported cases, which represented 30 percent of the cases in Los Angeles County, with an incidence rate of 25 per 100,000 people. The incidence rate decreased to 74 reported cases in both 2012 and 2013. As such, in 2013, SPA 1 represented approximately 20.4 percent of the total reported cases in Los Angeles County, with an incidence rate of 19 per 100,000 people. SPA 1 has the highest infection rate in Los Angeles County, which relates to the hot spot referred to in the comment (LACDPH 2013).

However, the rate of Valley Fever infection in Los Angeles County, and the Antelope Valley specifically, is substantially less than in neighboring Kern County, which had a 2013 infection rate of 276 per 100,000 people in the north valley region (KCPHSD 2016). The eastern portion of San Luis Obispo County had Valley Fever infection rates ranging from 205 to 257 per 100,000 people in 2007 through 2012 (SLOCPHD 2014). Therefore, although the Antelope Valley has the highest rates in Los Angeles County, the rates are well below rates found nearby counties where Valley Fever is endemic.

According to the Centers for Disease Control, California has areas that are categorized as “highly endemic”, “established endemic”, and “suspected endemic” for coccidioidomycosis. Los Angeles County as a whole is categorized as being “suspected endemic”, which is the same category ascribed to large areas of Nevada, New Mexico, and western Texas (CDC 2016). Highly endemic areas include Kern County and southern Arizona, including the metropolitan areas of Phoenix and Tucson. As presented in CRLA-10 above, the CDCR has not identified the Lancaster area as being a geographic location that requires screening or interventions for the State prison population with regard to exposure to Valley Fever (CDCR 2013).

CRLA-12

The possibility of future inmates potentially contracting Valley Fever is expressly addressed in the Draft EIR Section 4.2, Air Quality, which acknowledges that the future inmate population has the potential to be exposed to dust generated from soils in the Antelope Valley, which have the potential to contain *Coccidioides* spores. Additionally, Section 4.2, Air Quality, acknowledges that the Project site is located adjacent to land on the east that has exposed native soils (i.e., a 2-megawatt [MW] solar array) and is situated in the context of many acres of undeveloped land and fallow farmland that could generate airborne dust during windstorms. However, the Draft EIR concludes that the potential future inmate population's temporary placement into the Antelope Valley, which includes the inmates' participation in all indoor and outdoor activities at the MLWDC, would not constitute placement into a hazardous existing environmental setting that would require mitigation.

CRLA-13

As discussed with the Sheriff's Department staff for the preparation of the Draft EIR, the operation of the MLWDC will follow standard LACDPH procedures for medical care and prevention with regard to health care for inmates in general, and Valley Fever specifically, and the Sheriff's Department will continue to coordinate with the LACDPH (Masis 2015). The LACDPH is the designated County agency with the mandate to protect health, to prevent disease, and to promote the health and well-being of all persons in Los Angeles County. In fact, *The Changing Epidemiology of Coccidioidomycosis in Los Angeles (LA) County, California 1973–2011*, which is referred to in the CRLA comment letter, was co-authored by Ramon Guevara, Tasneem Motala, and Dawn Terashita of the LACDPH. The LACDPH is highly aware of Valley Fever and monitors reports of any cases of the disease. As such, any future changes in LACDPH policies that may be made regarding Valley Fever for inmate populations will be implemented, as applicable, throughout the County jail system.

CRLA-14

The commenter's assertion that emissions from service/delivery trucks are not included in the Draft EIR analysis is incorrect. As stated in the footnotes to Table 6-1, Project Trip Generation, of the Traffic Impact Study (which is Appendix H of the EIR), “The site specific daily trip generation was derived based on detailed site programming information (employee numbers and shifts,

miscellaneous delivery trucks, and inmate transport vehicles) as provided by County staff" (LLG 2015). Employee trips were estimated at 922 daily trips (461 round-trips); inmate transport trips were estimated at 16 daily trips (8 round-trips); and other miscellaneous trips were estimated at 100 daily trips (50 round-trips).

Laundry will be delivered to the site 3 times a week, with the actual laundering done remotely at another County facility. The Project will also receive food deliveries daily during the work week. Commissary delivery will occur once a week. These deliveries are accounted for in the estimated 100 daily service vehicle trips used in the Traffic Impact Study.

The trip generation is summarized in Section 4.13, Transportation and Traffic, which states the trip generation data includes "all trip types (i.e., staff and employees, service, and inmate visitation trips)". The calculation of mobile source input for trip generation was taken from the Project's Traffic Impact Study. Section 4.2, Air Quality, presents the results of the emission analysis using California Emissions Estimator Model (CalEEMod) Version 2013.2.2, which is a computer program that is used to calculate anticipated emissions associated with land development projects in California. Operational inputs include the year of analysis and vehicle trip generation rates. Output operational emissions data categories include area, energy, and mobile sources. Area sources are landscape maintenance equipment, consumer products, and architectural coatings used for routine maintenance. Energy emissions are from natural gas consumption. Mobile sources are the vehicles used by staff, visitors, and vendors, and include buses used for inmate transport.

Therefore, the Project's trip generation, which includes 100 daily trips for service vehicles, was included as an input into the CalEEMod air quality analysis. As shown in Table 4.2-7 of Section 4.2, Air Quality, the estimated annual operational emissions due to Project-related operations would not exceed the AVAQMD's CEQA significance thresholds, and potential impacts would be less than significant. In fact, emissions were well below the thresholds of significance. For example, carbon monoxide (CO) was the air contaminant with the highest annual rate of emission, and the Project was estimated to emit 18 tons per year, while the AVAQMD threshold of significance is 100 tons per year.

As described in the Project Traffic Impact Study, it is anticipated that the relocation of inmates to the MLWDC would result in additional vehicle miles traveled (VMT) by visitors on weekends and holidays, inmate buses, and by service/delivery trucks seven days per week when compared to the length of trips required for the Century Regional Detention Facility (CRDF) located in the City of Lynwood. The worst-case estimate is an increase of 2,500 VMT on a weekday and 25,700 VMT on a weekend day or holiday (LLG 2015). To account for the increased VMT, CalEEMod default trip distances were adjusted to add approximately 3.26 million annual VMT to the VMT generated with default trip distances.

CRLA-15

The commenter's concern with use of the "Air quality plan" is unclear. The use of that term in Section 4.2, Air Quality, is derived from CEQA Guidelines Threshold 4.2a, which states "A project would result in a significant adverse impact related to Air Quality if it would conflict with or obstruct implementation of the applicable air quality plan". As stated in Section 4.2.2, Existing Conditions, of Section 4.2, Air Quality, areas that are in nonattainment are required to prepare air quality plans and implement measures that will bring the region into attainment. When an area has been reclassified from nonattainment to attainment for a federal standard, the status is identified as "maintenance", and there must be a plan and measures established that will keep the region in attainment for the following ten years. For the reasons detailed on page 4.2-14 under Threshold

4.2a, the air quality plans applicable to the Project site are the *AVAQMD 2004 Ozone Attainment Plan (State and Federal)* and the *2008 AVAQMD Federal 8-Hour Ozone Attainment Plan (Western Mojave Desert Non-attainment Area)*.

CRLA-16

Outdoor recreation, both active (e.g., use of sports courts, running track) and passive (e.g., sitting in courtyards or on turf grass areas), will occur on the Project site. The outdoor recreation opportunities and amenities are one of the benefits of the proposed MLWDC Project when compared to existing facilities at the CRDF. There are no known reasons to believe that risks of infection from Valley Fever from participating in outdoor recreational activities at the MLWDC site would be any different from the risks of participating in outdoor activities elsewhere in the Lancaster portion of the Antelope Valley.

Because the future inmate population's exposure to disturbed soils would be limited to gardening activities, PDF AIR-3 in Section 4.2, Air Quality, states that the Project will import gardening soils from outside the Antelope Valley to be used in raised planting beds to remove gardening in native soil as a potential source of exposure to Valley Fever spores. Vendors for garden soil are numerous and a specific provider has not been determined at this time; however, as required by PDF AIR-3, only imported gardening soil will be used at the Project site. Further, outdoor recreational areas would be covered with landscaping, turf grass, gravel or landscaping/wood chip ground cover that would minimize the opportunity for soils to become airborne.

CRLA-17

There have been no tests conducted on the Project site to measure for Valley Fever spores within on-site soils. According to the Centers for Disease Control, testing soil for *Coccidioides* is not likely to be useful because the fungus is thought to be common in the soil in certain areas. A soil sample that tests positive for *Coccidioides* does not necessarily mean that the soil will release the fungus into the air and cause infection. Also, there are no commercially available tests to detect *Coccidioides* in soil. Testing soil for *Coccidioides* is currently only done for scientific research (CDC 2016).

The majority of the Project site will be paved or landscaped, and exposure to disturbed soils would be minimized through PDF AIR-3. Section 4.2, Air Quality, acknowledges that the future inmate population has the potential to be exposed to dust generated from soils in the Antelope Valley, which have the potential to contain *Coccidioides* spores. Additionally, Section 4.2 acknowledges that the Project site is located adjacent to land on the east that has exposed native soils (i.e., a 2-MW solar array), and is situated in the context of many acres of undeveloped land and fallow farmland that could generate airborne dust during windstorms. However, the Draft EIR concludes that the potential future inmate population's temporary placement into the Antelope Valley, which includes the inmates' participation in all indoor and outdoor activities at the MLWDC, would not constitute placement into a hazardous existing environmental setting that would require mitigation.

CRLA-18

Section 4.2, Air Quality, analyzes the potential for pollutant emissions during demolition, construction and operation of the Project. Impacts were determined to be less than significant, with compliance with RRs and the implementation of Project Design Features (PDFs). As stated in Response CRLA-16, there are no known reasons to believe that risks of infection from Valley Fever from participating in outdoor recreational activities at the MLWDC site would be any

different from the risks of participating in outdoor activities elsewhere in the Lancaster portion of the Antelope Valley.

Section 4.2, Air Quality, acknowledges that the future inmate population has the potential to be exposed to dust generated from soils in the Antelope Valley, which has the potential to contain *Coccidioides* spores. As discussed in Section 3.0, Project Description of the Draft EIR, according to the Sheriff's Department, AB 109 female inmates are serving an average of 423 days in custody from sentencing date to release date, while non-AB 109 female inmates serve an average of 107 days in custody. Therefore, the length of time that inmates would be living at the MLWDC is temporary, and is not equivalent to a permanent living circumstance or the longer sentences in state prisons that house higher-security inmates. The Draft EIR concludes that the potential future inmate population's temporary placement into the Antelope Valley, which includes the inmates' participation in all indoor and outdoor activities at the MLWDC, would not constitute placement into a hazardous existing environmental setting that would require mitigation.

CRLA-19

Section 4.3.2 of the Draft EIR sets forth a detailed description of the existing conditions relating to the plant and animal wildlife species that may be encountered on the Project site. A few examples of wildlife species expected to use the Project site include reptiles such as side-blotched lizard (*Uta stansburiana*) and western whiptail (*Aspidoscelis tigris*); bird species such as rock pigeon (*Columba livia*), house finch (*Haemorhous mexicanus*), European starling (*Sturnus vulgaris*), mourning dove (*Zenaida macroura*), and northern mockingbird (*Mimus polyglottos*); and mammals such as deer mouse (*Peromyscus maniculatus*), Botta's pocket gopher (*Thomomys bottae*), and desert cottontail (*Sylvilagus audubonii*).

Implementation of the proposed Project would have limited impact on habitat and/or movement of wildlife species due to limited wildlife use of the Project site. As stated in Section 4.3, Biological Resources, the site is highly developed and lacks native habitats. The Project site is entirely contained by a perimeter fence that does not allow for passage into or out of the MLDC except within secured gated areas. Therefore, the Project site does not represent an important regional movement corridor, and few wildlife species are expected to use the site. Extremely limited local movement of common wildlife species through unfenced parking areas or landscaped areas of the site may occur for foraging and dispersal. The Project's short-term and long-term construction impacts would not have an impact on any regional wildlife movement. Furthermore, the wildlife expected to use the site are expected to be highly adapted to human disturbance. Construction and ground-disturbing activities would not significantly impact habitat because there is extensive (non-specialized) habitat for these common species throughout the Project site.

CRLA-20

As stated in Section 4.3, Biological Resources, essentially all naturally occurring bird species (e.g., house finch) in North America are considered to be migratory and are included on the list of species protected under the Migratory Bird Treaty Act (MBTA). Suitable nesting habitat for common migratory birds is present in mature trees and other structures on the Project site, and in its adjacent areas, and could be adversely impacted either directly or indirectly during the Project's short-term construction impacts. Activities such as vegetation removal and structure demolition could potentially cause nest failure during the breeding season. Implementation of MM BIO-2, which requires nesting bird surveys and construction buffer zones for construction activities occurring during the breeding season, would reduce potential direct and indirect impacts on nesting migratory birds.

The majority of bird species expected to use the Project site can be found year round and do not migrate long distances. Bird species expected to occur (e.g., European starling, mourning dove, and house finch) exhibit either differential or partial migration. In differential migration, migration is related to a bird's age and sex, and some birds do not travel at all but remain in the same general location year round. Partial migration is when some birds (independent of age/sex) migrate, while other birds do not travel at all. MM BIO-2, which requires nesting bird surveys and construction buffer zones for construction activities occurring during the breeding season, is proposed mitigation for protecting nesting migrating birds.

Generally speaking, construction will continue unhindered by particular seasons during the calendar year. In some cases, and when feasible, particular construction activities with high potential for breeding bird impacts (such as vegetation removal) may be scheduled during the non-breeding season. If avoidance of particular construction activities during the breeding season is not feasible, MM BIO-2 would be implemented. The duration of construction activities does not have an effect on implementation of MM BIO-2. As generally summarized below, MM BIO-2 requires that protective procedures are implemented if construction is scheduled to occur during the bird nesting season:

- To the extent feasible, vegetation/tree removal shall occur during the non-breeding season for nesting birds (generally late September to early March) and nesting raptors (generally early July to late January) to avoid impacts to nesting birds and raptors. If the nature of the Project requires that work be initiated during the breeding season for nesting birds and raptors (February 1 to August 31), a pre-construction survey shall be conducted by a qualified Biologist. If the Biologist does not find any active nests within or immediately adjacent to the impact area, the vegetation clearing/construction work shall be allowed to proceed.
- If the Biologist finds an active nest within or immediately adjacent to the construction area and determines that the nest may be impacted or breeding activities substantially disrupted, the Biologist shall delineate an appropriate buffer zone around the nest and the active nest shall be protected until nesting activity has ended. Encroachment into the buffer area around a known nest shall only be allowed if the Biologist determines that the proposed activity would not disturb the nest occupants. Construction will be allowed to proceed when the qualified Biologist has determined that fledglings have left the nest or the nest has failed.

MM BIO-2 will be implemented by the qualified Biologist hired by the County or its contractor prior to the start of construction. As stated in MM BIO-2, a letter report shall be prepared and submitted to the Los Angeles County Department of Public Works to document the survey findings and recommended protective measures.

CRLA-21

Potential impacts to bat maternity roosts are analyzed under Threshold 4.3d in the Draft EIR. Construction activities on the Project site are anticipated to begin in December 2016 for a duration of 35 months. MM BIO-1 prohibits removal of trees supporting bat maternity roost sites (where bats give birth and nurse their young) during bat maternity roost season (March 1 to July 31). The demolition of bat maternity roosts, if present on the Project site, would indirectly impede the use of wildlife nursery sites, as the colony would not be able to return to their nursery site. However, there is low potential for bat maternity roosts on the Project site due to limited suitable habitat, the presence of human activity on the site, and a lack of open water. A potential bat maternity roost location on the Project site being removed after the maternity season would not be considered a

substantial impediment to the use of native wildlife nursery sites due to the relatively low population such roost would support in relation to the larger regional bat population.

Bat maternity roosts of any bat species may be considered native wildlife nursery sites. Common bat species, such as California myotis, form maternity colonies in places such as crevices of old snags, crevices of trees, bridges, and buildings. Impacts to multiple such active breeding colonies during the breeding season could potentially cause a decline in regional population. MM BIO-1 calls for pre-construction bat surveys and bat exclusion procedures. There is low potential for bat maternity roosts, colonial roosts, and solitary roost sites on the Project site due to limited suitable habitat, the presence of human activity on the site, and a lack of open water. Potential colonial, solitary, and maternity roosts being removed from the Project site would not be considered a substantial ecological impact due to the relatively low population such roosts would support in relation to the larger regional bat population.

CRLA-22

This comment alleges that MM BIO-1 is not appropriate or effective. The portion of MM BIO-1 related to bats is intended to avoid direct impacts to maternity roosts during the breeding season. The purpose of said avoidance is to reduce potentially significant impacts to native wildlife nursery sites (bat maternity roosts) to levels considered less than significant. MM BIO-1 effectively avoids the impact of removing occupied bat maternity roosts by requiring a pre-construction bat habitat assessment of the trees and/or structures marked for potential removal/demolition prior to commencement of construction activities. If potential maternity roosts are detected during the bat habitat assessment, construction activities will not occur until the bat maternity season has ended.

CRLA-23

The implementation of MM BIO-1 would occur immediately prior to Project construction activities. Therefore, surveys would not be conducted or completed during the timeframe of the Final EIR, which must be provided to the Board of Supervisors for review and consideration prior to any decision to approve, revise, or deny the Project. As required in MM BIO-1 and MM BIO-2, only qualified biologists shall be retained to conduct the required surveys and/or assessments. County studies and reports such as the ones required by the Draft EIR would be available for public review in accordance with the California Public Records Act (CPRA), which requires that governmental records must be disclosed to the public upon request, unless there is a specific reason not to do so, in accordance with exemptions within the CPRA or other state laws.

CRLA-24

MM BIO-2 requires the establishment of "an appropriate buffer zone" around an active nest, if found. An appropriate buffer zone is an area surrounding an active nest where no Project-related activities may occur. The zone is determined by a qualified Biologist who is familiar with the behavior of the birds tending to the nest. The buffer zone is specific to each particular nest and may vary from site to site depending on the construction activity, the height of the nest in a tree or other structure, the species of nesting bird, and other factors. An appropriate buffer zone is one that avoids a nest failure (through direct or indirect impacts) due to construction activities. We are unaware of a standard buffer size determined by the American Institute of Biological Sciences. The method set forth in MM BIO-2 is consistent with the requirements set forth for other development Projects throughout Los Angeles County that require compliance with the MTBA, which are regularly vetted through the California Department of Fish and Wildlife (CDFW) review of CEQA environmental documents.

CRLA-25

The Draft EIR relied upon a thorough search of the Vertebrate Paleontology records conducted by the Natural History Museum of Los Angeles County (NHMLAC), as documented in a letter dated June 6, 2010, and located in Appendix C-2 of the Draft EIR. As stated, the surficial deposits in the Project area are “composed exclusively of younger Quaternary Alluvium beneath soil. These types of sedimentary deposits usually do not contain significant vertebrate fossils, at least in the uppermost layers”. The NHMLAC letter goes on to state that surface grading or shallow excavations in the proposed Project area are unlikely to encounter significant vertebrate fossils in the younger Quaternary Alluvium, while deeper excavations into older deposits could uncover significant fossil vertebrate remains (McLeod 2010).

Sedimentary deposits and formations do not change over the course of five years and, even if fossils were discovered in the Project area, the mitigation measure identified in the Draft EIR would remain unchanged. MM CUL-2 requires that a qualified Paleontologist be notified and retained when earth-moving activities are anticipated to impact undisturbed deposits in the older Quaternary alluvium on the Project site (i.e., approximately five feet below ground surface or deeper). The Paleontologist shall determine, based on consultation with the County, when monitoring of grading activities is needed based on on-site soils and final grading plans. If any fossil remains are discovered, the Paleontologist must prepare a report of the results of any findings, which would be submitted to the NHMLAC that would then update its own records and maps accordingly.

An updated records search was requested and received from the NHMLAC and their response is provided in Appendix B of this Response to Comments (McLeod 2016). The only difference between the new 2016 records search and the 2010 records search is that additional fossil species have been found in the vicinity of the Project site. The camel fossil that is mentioned in the letter was found at the County's High Desert Regional Health Center (located approximately 5.5 miles east of the Project site). However, the recommendations in the NHMLAC letter are the same as in the prior records search, and MM CUL-2 reflects the NHMLAC's recommendation. No change to the Draft EIR analysis or MM CUL-2 is required.

CRLA-26

As stated on page 4.4-11 of the Draft EIR, an inquiry was made on January 30, 2014, of the Native American Heritage Commission (NAHC) to request a review of the Sacred Lands File database regarding the possibility of Native American cultural resources and/or sacred places in the Project vicinity that are not documented in other databases. The NAHC responded on January 31, 2014, and indicated that there are no records of Native American traditional cultural places with the NAHC in the Project area, but the NAHC provided a list of Native American groups and individuals who may have knowledge regarding Native American cultural resources not formally listed on any database. Subsequently, letters to Native American tribes were sent out on February 3, 2014. Beverly Salazar Folkes was sent a letter on February 3, 2014, using the address provided by the NAHC (see Appendix C-3 of the Draft EIR). Only Daniel McCarthy of the San Manuel Band of Mission Indians responded via email on February 6, 2014, and stated that, given the nature and location of the Project, the San Manuel Band has no concerns (McCarthy 2014). See Appendix C of this Final EIR. No follow-up on the other tribes was made as the documentation relies on the contact information from the NAHC as the authoritative source and it is common not to receive responses from all the tribes contacted.

The Project does not require a General Plan Amendment or Specific Plan Amendment and thus, is not subject to the Native American consultation under Senate Bill (SB) 18. The Notice of

Preparation (NOP) for the Project was also sent out prior to the effective date of Assembly Bill (AB) 52, which provides a separate consultation process that can be triggered by a tribe and applies only to projects for which the NOP scoping notice was sent on or after July 1, 2015. Thus, the County is not specifically required to notify Native American tribes under CEQA. However, as stated above, information letters were sent to local tribes as part of the background research for the Project site (see Appendix C-3 of the Draft EIR for the letters sent).

It cannot be entirely discounted that archaeological resources may be present beneath the pavement, buildings, or ground surfaces. Thus, MM CUL-1 calls for a qualified Archaeologist to be retained by the County to attend the pre-grading meeting with the Construction Contractor to establish, based on the site plans, appropriate procedures for monitoring earth-moving activities during construction. The Archaeologist would determine, based on consultation with the County, when monitoring of grading activities is needed. Monitoring should observe disturbance of the uppermost layers of sediment (soils and younger Quaternary alluvium), and any archaeological resources discovered shall be salvaged and catalogued, as necessary.

CRLA-27

The comment alleges that not all contributing buildings to the Historic District have been identified. Section 4.4, Cultural Resources, includes a summary of the findings of the Historical Resources Report included in Appendix C-1 of the Draft EIR. The Report concludes that there is a historic district in the Project study area. The district, named the Polaris Flight Academy Historic District, meets the criteria for listing in the National Register of Historic Places (NRHP) and the California Register of Historical Resources (CRHR) for its direct associations with military aviation during World War II and the work of Major Corliss Champion Moseley. It is therefore considered a historical resource subject to the requirements of CEQA (GPA 2015).

It is recognized as standard methodology to evaluate groupings of buildings, structures, objects, and landscape features within a distinct geographic area with shared historic contexts as potential historic districts. One key factor in determining contributing and non-contributing resources is period of significance. Buildings constructed outside the period of significance cannot be considered contributors. Because the Historic District, in this case, is significant for its World War II history, its period of significance within this context ended in 1945. Thus, the buildings constructed after 1945 are not contributors. They were constructed for different uses by different entities.

It would have been appropriate to evaluate the three buildings (i.e., Old Lock Building, Quonset Hut, and Wooden Shed) in question individually, above and beyond their evaluations as contributors, if they had any potential to represent an important historic context as individual buildings. The contextual research into the postwar history of the property when it was used by the State and the County as a detention facility indicated no reason to conclude that the property had any significance other than its World War II significance. As a result, there is no significant historic context for the three buildings to potentially represent. The resulting evaluation would reach exactly the same conclusion: the buildings would be assigned a 6Z classification, not eligible for designation.

Furthermore, there were no buildings between the two large historic hangars during the property's period of significance, so removing the three non-contributing buildings will actually be beneficial to the ratio of contributors to non-contributors in the Historic District. Project implementation will not have a significant impact on the Historic District, and no further analysis is required.

CRLA-28

The implementation of MM CUL-2 would occur immediately prior to, and during, Project construction activities. The qualified Paleontologist would be hired by the County or its contractor prior to the start of construction. Therefore, monitoring would not be conducted or completed during the timeframe of the Final EIR, which must be provided to the Board of Supervisors for review and consideration prior to any decision to approve, revise, or deny the Project. A plan for the evaluation, recordation, recovery, and/or salvage of any discovered fossil remains would be formulated by the Paleontologist at the time of the discovery based on the circumstances of the find. County studies and reports such as the ones required by the Draft EIR would be available for public review in accordance with the California Public Records Act (CPRA), which requires that governmental records be disclosed to the public upon request, unless there is a specific reason not to do so, in accordance with exemptions within the CPRA or other state laws.

CRLA-29

The Draft EIR includes an analysis of exposure hazards due to fugitive dust that may result from construction-related earth-moving activities. PDF AIR-1, which will be included in the Contractor's Specification and monitored through the MMRP, requires the distribution of materials on Valley Fever, or any updated materials as applicable, to worksite supervisors and construction workers. PDF AIR-2 and RR AIR-1, which will be included in the Contractor's Specification and monitored through the MMRP, require compliance with Best Management Practices and AVAQMD Rule 403 for the prevention of fugitive dust and nuisance air contaminants. RR AIR-1 provides a listing of the most applicable AVAQMD Rules. Rule 403, Fugitive Dust, requires measures such as watering and control of track-out from the site, as well as submittal of a Dust Control Plan prior to the start of construction. Rule 403 requires control of fugitive dust and avoidance of nuisance, and Rule 402 prohibits the emission of quantities of air contaminants that could cause injury, detriment, nuisance, or annoyance to the public or that could endanger the comfort, repose, health, or safety of the public. With implementation of RR AIR-1, on-site earth-moving activities would not result in fugitive dust that could affect adjacent off-site land uses.

As stated in RR AIR-2, the Project will be constructed in compliance with the Department of Health – Infection Control Policy Guidelines Procedure No. 918.01. Policy 918 is intended to prevent the spread of diseases that may be caused by construction-induced airborne pollution in susceptible individuals (patients, staff, and the public) at Department of Health Services (DHS) facilities. The protocols and requirements mandate the designation of an Infection Control Coordinator who must review and approve infection-control plans for new construction or renovation projects to ensure a safe environment. These infection-control plans must include infection-control measures to contain dust, debris, and others and must protect the patients, employees, and visitors in this environment. The Infection Control Coordinator has independent authority to stop construction-related activity immediately when the public may be adversely affected by infection-control hazards generated during construction-related activities and when the infection-control precautions and/or engineering controls are inadequate to contain the hazard. As such, the Draft EIR states that exposure to Valley Fever during construction activities would be the same as exposure to dust, and, thus, should follow the requirements for the mitigation of dust. Impacts would be less than significant, and no mitigation is required.

CRLA-30

This comment alleges that MM CUL-1 and MM CUL-2 are not sufficient. MMs are set forth in the Draft EIR as required activities that must occur in order to reduce potentially significant environmental impacts. No required pre-construction activities would occur or be contracted for,

until the Board of Supervisors has made a determination to approve the Project. Should the Board of Supervisors decide to modify the Project, the MMs set forth in the Draft EIR may require changes. Should the Board of Supervisors decide to deny the Project, then there would be no need to continue with requirements set forth in the MMs.

The Project site survey that was completed for on-site archaeological resources is discussed in Section 4.4, Cultural Resources, under Thresholds 4.4b and 4.4c. BonTerra Psomas' Archaeologist Patrick Maxon, M.A., RPA, completed a pedestrian survey of the Project site on November 21, 2013. He walked all accessible open areas of the site to determine if there were exposed archaeological resources. No archaeological resources were expected as the site is largely developed with buildings, sidewalks, parking areas, roads, and other paved areas. The findings of his site survey, along with the conclusions of the Vertebrate Paleontology records conducted by the NHMLAC (see Appendix C-2 of the Draft EIR), are incorporated into the analyses in Section 4.4, Cultural Resources, under Thresholds 4.4b and 4.4c.

Section 21081.6 of CEQA and Section 15097 of the State CEQA Guidelines require a public agency to adopt an MMRP for assessing and ensuring the implementation of required mitigation measures applied to proposed projects. Specific reporting and/or monitoring requirements that will be enforced during Project implementation shall be adopted simultaneously with final Project approval by the responsible lead agency.

CRLA-31

There have been no tests conducted on the Project site for Valley Fever spores within on-site soils. According to the Centers for Disease Control, in general, testing soil for *Coccidioides* spores (i.e., the fungus that causes Valley Fever) is not likely to be useful because the fungus is thought to be common in the soils in certain areas. A soil sample that tests positive for *Coccidioides* does not necessarily mean that the soil will release the fungus into the air and cause infection. Also, there are no commercially available tests to detect *Coccidioides* in soil. Testing soil for *Coccidioides* is currently only done for scientific research (CDC 2016).

The Phase I Environmental Site Assessment (ESA) included in Appendix E-1 of the Draft EIR included the results of a survey of the Project site to identify potential environmental concerns (Converse 2014c). The Phase II ESA included in Appendix E-3 of the Draft EIR included the results of 14 soil borings to depths of 8 feet below the ground surface (bgs) (Converse 2015). All soil samples from two and four feet bgs were analyzed for Total Petroleum Hydrocarbons (TPH), Volatile Organic Compounds (VOCs), and metals in accordance with U.S. Environmental Protection Agency (USEPA) Test Methods 8015M, 8260B, and 6010B/7471A, respectively. The findings of the Phase I and Phase II ESAs are summarized in Section 4.7, Hazards and Hazardous Materials, of the Draft EIR. As stated on page 4.7-18, the soil analyses indicate that no VOCs are present in the soil samples. All reported metals, except arsenic, were found to be at levels below the California Human Health Screening Levels (CHHSLs) for both residential and commercial/industrial land. The arsenic levels are below the background level of the 12 milligrams per kilogram (mg/kg) level that the Department of Toxic Substances Control (DTSC) has determined to be naturally occurring background levels at school sites in California. The qualifications of the preparers of the Phase I ESA are provided in Section 13.0 of the report. The preparer of the Phase II ESA is also one of the preparers of the Phase I ESA.

CRLA-32

As stated in Section 4.5, Geology and Soils, liquefaction is the sudden decrease in the strength of cohesionless soils due to dynamic or cyclic shaking. Saturated soils behave temporarily as a

viscous fluid (liquefaction) and, consequently, lose their capacity to support structures. The potential for liquefaction decreases with increasing clay and gravel content, but increases as the ground acceleration and duration of shaking increase. Liquefaction potential has been found to be the greatest where both high groundwater and loose sands occur within 50 feet of the ground surface.

The *Geohazard Study Report* for the Project, as summarized in the Draft EIR, included a liquefaction analysis and indicates that the Project site may be susceptible to liquefaction (Converse 2014b). As such, proposed structures and infrastructure on the Project site may be exposed to liquefaction hazards, including damage to foundations; settlement of aboveground structures; and uplift of buried structures and infrastructure. Prior to the completion of final engineering design plans, additional geotechnical exploration, lab testing, and analysis may be required for planned seismic upgrades to existing buildings in order to provide detailed design recommendations. The Project's structural design, which must be completed in accordance with the recommendations of the geotechnical investigation and subject to the County Building Official, as included in RR GEO-1, would address liquefaction hazards to prevent damage to foundations, structures, and infrastructure.

Reductions in the groundwater levels are generally likely to decrease the potential for liquefaction because water would be farther from the ground surface. It is anticipated that the engineering design for the Project will account for liquefaction hazards based on soil testing that would be completed as part of RR GEO-1.

CRLA-33

As the commenter states, the Antelope Valley can be subject to periodic strong winds. High winds have the ability to transport dust and soil, which may or may not contain *Coccidioides* spores. The Draft EIR includes an analysis of potential exposure to fugitive dust that may result from construction-related earth-moving activities. PDF AIR-1, which will be included in the Contractor's Specification and monitored through the MMRP, requires the distribution of materials on Valley Fever, or any updated materials as applicable, to worksite supervisors and construction workers. PDF AIR-2 and RR AIR-1, which will be included in the Contractor's Specification and monitored through the MMRP, requires compliance with Best Management Practices and AVAQMD Rule 403 for the prevention of fugitive dust and nuisance air contaminants. RR AIR-1 provides a listing of the most applicable AVAQMD Rules. Rule 403, Fugitive Dust, requires measures such as watering and control of track-out from the site, as well as submittal of a Dust Control Plan prior to the start of construction. Rule 403 requires control of fugitive dust and avoidance of nuisance, and Rule 402 prohibits the emission of quantities of air contaminants that could cause injury, detriment, nuisance, or annoyance to the public, or that endanger the comfort, repose, health or safety of the public. With implementation of RR AIR-1, on-site earth-moving activities would not result in fugitive dust that could affect adjacent off-site land uses.

In a letter received from the AVAQMD, as included in Section 2.1.1 of this document, on this Project and included in the comment section of this Final EIR, the AVAQMD has concurred with the Draft EIR analysis of air quality and dust impacts.

CRLA-34

The groundwater level declines and associated land subsidence are not as severe near at the Project site as in other parts of the Antelope Valley groundwater basin. Local survey monument bench mark records would be reviewed to determine the amount of land subsidence on or near the Project site, as part of RR GEO-1. The design of the building foundations has not been

determined, as the design phase is yet to occur. However, the foundation design for new buildings or additions will be designed and constructed to appropriately address current soil conditions and characteristics identified by a California licensed geologist, soils engineer, and structural engineer. The design will meet code requirements, which include recognition of soil bearing pressure, seismic activity, and jurisdictional building codes as well as AB 900 structural requirements. Existing facilities are monitored periodically for distress as part of facility operation and maintenance protocol, and there would be no hazards posed to the inmate or employee population.

Additionally, the Antelope Valley Groundwater Basin has been recently adjudicated through Los Angeles Superior Court case number 1-05-CV-049053: Antelope Valley Groundwater Cases, Consolidated Proceeding 4408, which determined the safe yield of groundwater extraction from the basin and allocates pumping rights accordingly to users. As such, improved water conservation measures, including recharge of reclaimed water, storm water and imported waters, and other improved groundwater basin management and measures in compliance with the adjudication could be expected to reduce water level declines and associated land subsidence in the region, and provided sustainable safe yields within the Antelope Valley groundwater basin.

Regarding operational costs associated with the proposed Project, the final design of the facility has not been drafted or approved, and the long-term operational costs have not yet been determined.

CRLA-35

The analysis of geologic, soils, and seismic characteristics and constraints on the Project site and surrounding area—as presented in Section 4.5, Geology and Soils, is based on the *Geohazard Study Report – Mira Loma Detention Center, 45100 North 60th Street West, Lancaster, California* prepared by Converse Consultants in June 2014—has, in fact, been fully disclosed and included as Appendix D of the Draft EIR. The conclusions of significance findings in Section 4.5, Geology and Soils, are based on the substantial evidence presented in this technical study.

CRLA-36

While the Project's estimated water demand is less than the 250 acre-feet per year (afy) threshold established by the California Department of Water Resources (DWR) for requiring a Water Supply Assessment (WSA) as required under legislation commonly referred to as Senate Bill (SB) 610, a WSA was prepared for the Project and provided in Appendix G-2 of the Draft EIR. The WSA is also summarized in Section 4.14, Utilities and Service Systems. As required under SB 610, the WSA must include an evaluation of the sufficiency of the water supplies available to the water supplier to meet existing and anticipated future demands (including the demand associated with the project) over a 20-year horizon that includes normal, single-dry, and multiple-dry years. The multiple-dry year scenario would represent drought conditions.

The WSA for the Project indicates that the Los Angeles County Waterworks District 40 (LACWWD 40) would be able to meet the projected water demands in its service area, along with the Project's demands, through the next 20 years, including normal, single-dry, and multiple dry (5-year period) years. Future demand is projected to increase within the LACWWD 40 service areas and the reliability of the LACWWD 40's future water supplies to meet demand will be ensured through continued implementation of programs for water banking; purchase of new imported supplies; water transfers; water conservation; and expansion of recycled water systems.

Thus, the potential impacts of climate change on reduced water supplies due to drought conditions have been accounted for in the Project's WSA. The WSA was reviewed by LACWWD 40 prior to inclusion in the Draft EIR.

CRLA-37

As stated in Section 4.6, Greenhouse Gas Emissions, of the Draft EIR, "materials to be imported to and exported from the site" are accounted for in the CalEEMod calculations for the Project. Although it is anticipated that "cut and fill would be balanced on site; no import or export of soils would occur". As stated on page 4.2-15 of the Draft EIR, the CalEEMod analysis presented in Section 4.2, Air Quality, and Section 4.6, Greenhouse Gas Emissions, conservatively include 200 haul truck roundtrips during the Site Preparation phase to cover unanticipated and incidental export and import haul, such as import soil for raised garden beds or for the removal of waste materials.

The Project would use water from wells that are on site during construction activities; there would be no imported water for construction use, as stated on page 4.14-17 of Section 4.14, Utilities and Service Systems. However, the CalEEMod input specifies watering for construction dust control and assumes the use of water trucks in the emissions calculations. Additionally, the modeling assumes ten truck roundtrips per day during the Building Construction phase to cover the delivery of materials and export of construction waste. Therefore, the analysis set forth in the Draft EIR includes a conservative analysis of truck trips and no additional analysis is required.

CRLA-38

The commenter's quoted text is a statement that describes the rationale for the South Coast Air Quality Management District's (SCAQMD's) construction emission amortization methodology. Section 4.6, Greenhouse Gas Emissions, utilizes the methodology set forth by SCAQMD, which is also used by the AVAQMD. In essence, this statement means that construction equipment greenhouse gas (GHG) emission factors only change slowly with time, and therefore, there are limited ways to decrease emissions from construction equipment. The inventory of construction equipment to be used during each phase of this Project is included in Appendix B of the Draft EIR, as stated in Section 4.6, Greenhouse Gas Emissions. The construction equipment type, amount, usage hours per day, horse power, and load factor are also included in Appendix B of the Draft EIR.

CRLA-39

The reference in Section 4.6, Greenhouse Gas Emissions, to construction activities beginning in November 2016 has been revised in Section 3.0, Clarifications to the Draft EIR to reflect the anticipated December 2016 start date. The analysis throughout the Draft EIR is not materially affected by the start date of construction activities. The analysis of GHG emissions is not based on start/end dates because emissions are analyzed on an annual basis. The following is stated under Section 4.6.6, Impact Analysis,

It should be noted that the Design-Build contractor may request an expedited schedule to work on Saturdays and/or to increase the intensity of the daily construction operations through the use of more equipment/workers on-site than anticipated in the Project's proposed schedule (see Section 3.0, Project Description). This request would be considered for the purpose of reducing the duration of the Project construction period. The emissions modeling assumes a 5-day work week. If some or all construction would occur on a 6-day per week

schedule and/or the schedule would be shortened by using more equipment, annual greenhouse gas emissions may increase for the years affected. Because the total Project effort would not change, there would be offsetting decreases later in the Project and the total greenhouse gas emissions would be the same, or approximately the same as shown in Table 4.6-2. The amortized Project emissions would not change.

No additional analysis is required.

CRLA-40

As stated in Section 4.6, Greenhouse Gas Emissions, “as originally proposed by the SCAQMD, it has become current practice (in most air districts) that construction emissions are amortized over a project lifetime (typically 30 years) so that GHG-reduction measures will address construction GHG emissions as part of the operational GHG reduction strategies (SCAQMD 2008; SMAQMD 2009)”. The AVAQMD uses the SCAQMD’s construction emission amortization methodology. The AVAQMD threshold for significant GHG emissions of 100,000 tons (90,718 metric tons) is stated on page 4.6-12 of the Draft EIR. There are no separate thresholds for construction and operations. However, for comparison, the estimated construction emissions per year are shown in Table 4.6-2 in Section 4.6, Greenhouse Gas Emissions. As shown, the Project’s maximum annual construction GHG emissions in 2017 of 306 metric tons of carbon dioxide equivalent (MTCO_{2e}) are substantially less than 90,718 MTCO_{2e}.

As shown in Table 4.6-4 of Section 4.6, Greenhouse Gas Emissions, with consideration of amortized construction emissions, the total annual estimated GHG emissions for the Project are 5,614 MTCO_{2e}/yr. This value is considerably less than the AVAQMD threshold of 90,718 MTCO_{2e}/yr. Therefore, the Project would result in less than significant GHG emissions, and no mitigation is required.

CRLA-41

The total Project-related greenhouse gas emissions from construction activities are estimated based on the total work effort, whether that effort occurs during five-day or six-day work weeks. The “offsetting decreases” are not GHG reductions; they indicate that more work is done earlier in the schedule. The total work effort remains unchanged. The following is stated under Section 4.6.6, Impact Analysis:

It should be noted that the Design-Build contractor may request an expedited schedule to work on Saturdays and/or to increase the intensity of the daily construction operations through the use of more equipment/workers on-site than anticipated in the Project’s proposed schedule (see Section 3.0, Project Description). This request would be considered for the purpose of reducing the duration of the Project construction period. The emissions modeling assumes a 5-day work week. If some or all construction would occur on a 6-day per week schedule and/or the schedule would be shortened by using more equipment, annual greenhouse gas emissions may increase for the years affected. Because the total Project effort would not change, there would be offsetting decreases later in the Project and the total greenhouse gas emissions would be the same, or approximately the same as shown in Table 4.6-2. The amortized Project emissions would not change.

No additional analysis is required.

CRLA-42

The commenter's assertion that emissions from service/delivery trucks are not included in the Draft EIR analysis is incorrect. As stated in the footnotes to Table 6-1, Project Trip Generation, of the Traffic Impact Study, Appendix H of the EIR, "The site specific daily trip generation was derived based on detailed site programming information (employee numbers and shifts, miscellaneous delivery trucks, and inmate transport vehicles) as provided by County staff". Employee trips were estimated at 922 daily trips (461 round-trips); inmate transport trips were estimated at 16 daily trips (8 round-trips); and other miscellaneous trips were estimated at 100 daily trips (50 round-trips) (LLG 2015). The calculation of mobile source input for trip generation was taken from the Project's Traffic Impact Study and used as an input into CalEEMod, which is a computer program that is used to calculate anticipated emissions associated with land development projects in California. Therefore, the Project's trip generation, which includes 100 daily trips for service vehicles, was included as an input into the CalEEMod air quality and GHG analysis. No additional analysis is required.

CRLA-43

The operational annual emissions for each source area (i.e., area, energy, mobile, off-road, solid waste, water) were calculated using CalEEMod Version 2013.2.2. Estimates of energy use and solid waste were provided by the Los Angeles County Department of Public Works engineering staff. Additional details relative to the CalEEMod calculations may be found in Section 4.2, Air Quality, and in Appendix B of the Draft EIR. Operational emissions from the MLDC when it was occupied by the Immigration and Customs Enforcement (ICE) were not analyzed because the program ended in 2012 and was not in operation at the time of the issuance of the Project's Notice of Preparation (NOP). The NOP was issued in September 2014 which, according to Section 15125 of the State CEQA Guidelines, establishes the existing physical conditions on the Project site from both a local and regional perspective, and constitutes the baseline conditions by which a lead agency determines whether an impact is significant. As such, the GHG emissions from the previous uses at the Project site were not determined to be applicable for the Draft EIR.

CRLA-44

This comment offers no basis to support the statement that the analysis presented in Section 4.6, Greenhouse Gas Emissions, is inaccurate. As demonstrated through the responses for CRLA-37 through CRLA-43, the Draft EIR includes a conservative analysis of GHG emissions using the widely accepted CalEEMod methodology. We hope that a review of these responses to your comments and the information in the Draft EIR referenced will help to address your concerns. No additional analysis is required.

CRLA-45

As stated in RR GHG-4 in Section 4.6, Greenhouse Gas Emissions, "The Project will include an Employee Commute Reduction Plan (ECRP), commonly known as the Rideshare Plan, in accordance with Los Angeles County Code Chapter 5.9, Vehicle Trip Reduction. The ECRP will specify the measures to be implemented at MLWDC to achieve the target average vehicle ridership performance goal for employee vehicles subject to the Ordinance". Because reductions in GHG emissions from RR GHG-4 cannot be reasonably quantified, they were not taken into account in the CalEEMod emission calculations.

Although the ECRP is incorporated as a mandatory component of the Project, no GHG emissions reductions were applied to the CalEEMod assumptions for PDF GHG-1 through PDF GHG-4 or

for RR GHG-1 through RR GHG-5. Therefore, the elimination of the ECRP, or the inclusion of it, would not result in any changes to the calculations or conclusions presented in Section 4.6, Greenhouse Gas Emissions. The requirement for the ECRP is not a mitigation measure that is necessary to reduce a significant impact, but rather a County policy designed to encourage alternatives to single-occupancy vehicle trips.

CRLA-46

As stated in PDF GHG-2 in Section 4.6, Greenhouse Gas Emissions, the Project will provide a combined minimum of 34 video-visiting stations on site, along with video interview rooms in transitional housing buildings. This is anticipated to reduce VMT associated with vehicle travel to the MLWDC by inmate visitors by providing more options and opportunities for visitation when compared to the two video-visiting stations currently located within CRDF. However, deductions of VMT and GHG emissions associated with the video-visiting stations were not quantified in the GHG analyses or in the Project's Traffic Impact Study.

Because reductions in GHG emissions from PDF GHG-2 cannot be reasonably quantified, they were not taken into account in the CalEEMod emission calculations. Although PDF GHG-2 is incorporated as a mandatory component of the Project, no greenhouse gas emissions reductions were applied to the CalEEMod assumptions for PDF GHG-1 through PDF GHG-4 or for RR GHG-1 through RR GHG-5. Therefore, the elimination of the video visiting stations as set forth in PDF GHG-3, or the inclusion of them, would not result in any changes to the calculations or conclusions presented in Section 4.6, Greenhouse Gas Emissions.

CRLA-47

As stated in PDF GHG-3 in Section 4.6, Greenhouse Gas Emissions, the Project will post Antelope Valley Transit Authority (AVTA) bus and Metrolink schedules, as well as the locations of the nearest Park-and-Ride lots, in areas visible to visitors and in the Staff Services building to encourage the use of public transportation by staff and visitors. AVTA bus and Metrolink schedule information will be updated a minimum of every six months to ensure that they are accurate.

Because reductions in GHG emissions from PDF GHG-3 cannot be reasonably quantified, they were not taken into account in the CalEEMod emission calculations. Although PDF GHG-3 is incorporated as a mandatory component of the Project, no GHG emissions reductions were applied to the CalEEMod assumptions for PDF GHG-1 through PDF GHG-4 or for RR GHG-1 through RR GHG-5. Therefore, the elimination of the requirements set forth in PDF GHG-3, or the inclusion of them, would not result in any changes to the calculations or conclusions presented in Section 4.6, Greenhouse Gas Emissions.

CRLA-48

As stated in PDF GHG-4 in Section 4.6, Greenhouse Gas Emissions, the Project will incorporate (1) a secure storage area for staff to store bicycles into the Project design plans that allow for the individual locking of bicycles and protection from sun and inclement weather and (2) bicycle rack(s) adjacent to the Visitor Parking Lot that allows for the individual locking of bicycles.

Because reductions in GHG emissions from PDF GHG-4 cannot be reasonably quantified, they were not taken into account in the CalEEMod emission calculations. Although PDF GHG-4 is incorporated as a mandatory component of the Project, no GHG emissions reductions were applied to the CalEEMod assumptions for PDF GHG-1 through PDF GHG-4 or for RR GHG-1 through RR GHG-5. Therefore, the elimination of the requirements for bicycle facilities, or the

inclusion of them, would not result in any changes to the calculations or conclusions presented in Section 4.6, Greenhouse Gas Emissions.

CRLA-49

As stated in the responses for CRLA-45 through CRLA-48, the analysis presented in Section 4.6, Greenhouse Gas Emissions, did not take any deductions from the total annual GHG emissions that would result from implementation of PDF GHG-1 through PDF GHG-4, nor were deductions taken for RRs GHG-1 through GHG-5 because the reductions in VMT and mobile GHG emissions from the implementation of these RRs cannot be reasonably quantified. Therefore, the GHG emission estimates presented in the Draft EIR are conservatively high, and the impacts are less than significant.

CRLA-50

This comment, in part, raises issues that extend beyond the scope of CEQA requirements; nonetheless, the Board of Supervisors will receive and be able to consider it and all other comments raised before taking any action on the proposed Project. The scope of CEQA is generally limited to the evaluation of a proposed project's potential impact on the environment, and does not extend to the impact of the existing environment on a proposed project, or on its users or residents. The applicable definition of the environment analyzed for CEQA purposes in an environmental impact report is the physical conditions in the area that are affected by the proposed project (e.g., land, air, and water). The proposed MLWDC Project's Draft EIR discloses and addresses the potential direct, indirect, and cumulative impacts of the proposed Project on the physical environment, in accordance with the State CEQA Guidelines for all environmental issue areas. For the topics mentioned in the comment, refer specifically to Section 4.2, Air Quality, 4.6, Greenhouse Gas Emissions, and 4.14, Utilities and Service Systems of the Draft EIR.

CRLA-51

In 2015, the underground storage tanks (USTs) were reported to be in compliance and passed all leak detection requirements (CERS 2016, AW Associates 2016). Also, no soil contamination has been found near the fueling island (Converse 2016b). As such, the use or removal of these tanks will not lead to leaks that may potentially contaminate the underlying soils and groundwater and no mitigation is required.

CRLA-52

The information on the removal of the six USTs was taken from the Phase I ESA, which states that the information on the leaking underground tanks and clean up information was based on the list of Leaking Underground Storage Tanks (LUST) Sites (pages 24 and 25 of the Phase I ESA) and the County Department of Public Works records (pages 33 and 34 of the Phase I ESA). The County Department of Public Works oversaw the remediation and issued the "no further action" letter. The Phase I ESA is provided in Appendix E-1 of the Draft EIR.

CRLA-53

The sentence on page 4.7-8 of the Draft EIR reads “No leaks were observed, except for minor staining on the carpet and hydraulic oil on the concrete floors beneath the emergency generator in the central plant (i.e., steam plant)”. This information on minor staining was taken from the Phase I ESA, which is provided in Appendix E-1 of the Draft EIR. The minor staining was observed near unlabeled five-gallon containers with a minor amount of an oil-tar-like substance in the Sergeant Senior Building (pages 38 and 47 of Phase I ESA). The hydraulic oil was observed on the floor beneath the hole punch machine in the George Barracks and the emergency generator in the central plant (pages 5, 48, 51 and 52 of Phase I ESA). Soil testing near the hole punch machine location was performed in January 2016, which indicated no significant contamination findings (Converse 2016b). No further assessment is required.

CRLA-54

The Asbestos and Lead Based Paint Survey Report (Appendix E-2 of the Draft EIR) states that Buildings 27, 28 and 29 are temporary modular buildings that were visually inventoried but not sampled. These are pre-fabricated modular units (i.e., mobile homes) that appeared to be of newer construction (Converse 2014a). Building 27 will remain in place but Buildings 28, 29 and 40 may be disassembled and removed from the site but not demolished. However, this is not certain at this time prior to the Project's final design.

As demonstrated in Section 4.7, Hazards and Hazardous Materials, of the Draft EIR, MM HAZ-1 and MM HAZ-2 requires that, in the event that building materials are encountered during construction activities that are suspected of being asbestos-containing materials (ACMs) or lead-based paint (LBP), these materials shall be assumed to contain asbestos or lead and shall be handled, removed, transported and/or disposed in accordance with applicable regulations, until such time that they can be sampled and evaluated. As provided in Appendix D of this Final EIR, subsequent testing of building material samples from Buildings 27, 28, 29, 32 and 40 indicate the presence of asbestos-containing materials in Buildings 28, 29 and 40; and lead-based paint was found in the sinks in Building 29. If Buildings 27, 28, 29, 32 and 40 are removed, without being demolished, asbestos materials need not be abated. If these buildings are demolished, the asbestos materials would have to be abated and disposed in accordance with RR HAZ-4 and MM HAZ-1. If the sinks in Building 29 are removed intact, they can be disposed as construction debris; otherwise, they would have to be disposed in accordance with RR HAZ-4 and MM HAZ-2 (Converse 2016a). No adjustments to the RRs and MMs set forth in Section 4.7 of the Draft EIR are required.

CRLA-55

The DPW Closure Certification has been documented in the Phase I ESA and was reviewed by Converse Consultants during the preparation of the Phase I ESA.

CRLA-56

The Phase I ESA included the entire Project site, the former High Desert Hospital/Multi-Service Ambulatory Care Center, the Polaris Flight Academy, and the adjacent solar energy facility. The Phase I ESA is provided in Appendix E-1 of the Draft EIR. The northwestern section of the property parcel and any other structures and conditions that exist outside the Project boundary (identified in Exhibit 2.2 of Section 2.0, Environmental Setting) were not tested for the presence of hazardous materials under the Phase II ESA as no disturbance to these areas would occur with the Project. The Asbestos and Lead Based Paint Survey Report included the original survey

of 16 barracks buildings, approximately 20 surrounding and adjoining buildings, and a utility tunnel. The scope of the survey was subsequently expanded to include 15 additional, older buildings at the Mira Loma Detention Facility. The Asbestos and Lead Based Paint Survey Report is provided in Appendix E-2 of the Draft EIR. The Phase II ESA included soil borings at locations where environmental concerns were identified in the Phase I ESA. The Phase II ESA is provided in Appendix E-3 of the Draft EIR.

CRLA-57

As stated on pages 29 to 31 of the Phase I ESA, the County is working on compliance with the permit requirements but the Los Angeles County Fire Department has not accepted/received all required plans and documentation.

CRLA-58

The sentence on page 4.7-8 of the Draft EIR states that “No leaks were observed, except for minor staining on the carpet and hydraulic oil on the concrete floors beneath the emergency generator in the central plant (i.e., steam plant)”; this is based on visual observations during a 2014 site visit. The references to failing leak detection tests is a mechanical testing procedure that determines whether the leak detection system is functioning properly and does not indicate the presence of a leak. As stated on pages 35 and 36 of the Phase I ESA, Converse reviewed the leak detection reports, which indicated that secondary containment of two USTs at the fuel station failed for the turbine sump and fill sump and that one diesel fuel UST at the power plant failed for secondary containment piping and fill sump. Tanks have passed subsequent leak detection tests and are considered in compliance.

CRLA-59

As stated on page 4.7-19 of the Draft EIR, the existing fueling station is located outside the Project site boundary, but may be used by the Project. This fueling station has two USTs that previously failed leak detection tests. As shown in the California Environmental Reporting System (CERS) database and the Monitoring System Certification by AW Associates in Appendix E to this Final EIR, the tank permits were updated in 2015 and have passed subsequent leak detection tests and are now in compliance. Soil testing also indicated there is no soil contamination near the USTs (Converse 2016b). MM HAZ-3 requires the testing and repair, as necessary, of the USTs prior to the use of the existing fueling station by the Project.

CRLA-60

The hydraulic hoists in the vehicle service garage are located outside the Project site and are not planned to be used by the Project. Also, hydraulic hoists are not regulated like underground storage tanks and are considered to be benign or a low environmental concern (and off site).

As stated on page 4.7-19 of the Draft EIR, the hydraulic hoists have the potential to have led to subsurface soil contamination at the pits of the hoists. The Phase I ESA states that, when the hydraulic hoists are removed, the soils beneath the pits shall be sampled to determine the presence of contamination. If the results of the testing show that chemical levels are present above regulatory levels, remediation and/or removal of the contamination would have to be with the oversight of applicable regulatory agencies such as the Los Angeles County Fire Department (LACFD), the AVAQMD, the DTSC, and/or the USEPA in compliance with established maximum contaminant levels (MCLs). Also, the hoists and hydraulic oil would have to be disposed of in accordance with existing regulations for hazardous waste disposal. However, these hoists would

not be used or removed by the Project and thus, would not pose Project-related hazards to the environment. Soil testing at the project boundary area nearest to the hydraulic hoist location was performed in January 2016, which indicated no significant contamination findings (Converse 2016b).

CRLA-61

Based on the environmental concerns identified in the Phase I ESA, the Phase II ESA included soil borings at locations where these environmental concerns are located. Two soil sampling events have occurred at the site: Phase II ESA (May 9, 2015) and Supplemental Phase II ESA Soil Sampling (January 7, 2016). No contaminants of concern were detected in the soils during either sampling event. The findings of the soil testing in the Phase II ESA are summarized in Section 4.7, Hazards and Hazardous Materials, in the Draft EIR and the Phase II ESA is provided in Appendix E-3 of the Draft EIR.

CRLA-62

The Phase II ESA included 14 soil borings to depths of 8 feet below the ground surface (bgs). All soil samples from two and four feet bgs were analyzed for Total Petroleum Hydrocarbons (TPH), Volatile Organic Compounds (VOCs), and metals in accordance with USEPA Test Methods 8015M, 8260B, and 6010B/7471A, respectively. The findings of the Phase I and Phase II ESAs are summarized in Section 4.7, Hazards and Hazardous Materials, of the Draft EIR. As stated on page 4.7-18, the soil analyses indicate that no VOCs are present in the soil samples. All reported metals, except arsenic, were found to be at levels below the CHHSLs for both residential and commercial/industrial land. The arsenic levels are below the background level of 12 mg/kg level that the DTSC has determined to be naturally occurring background levels at school sites in California. The complete Phase I ESA is provided in Appendix E-1, and the Phase II ESA is provided in Appendix E-3.

Soil sampling occurred in 2015 (Supplemental Phase II ESA, Jan. 7, 2016) in the area of the fueling station and found no contaminants of concern. The references to failing leak detection tests is a mechanical testing procedure that determines whether the leak detection system is functioning properly and does not indicate the presence of a leak. Also, existing tanks are currently in compliance and have passed leak detection tests.

As stated on page 4.8-8 of the Draft EIR, groundwater levels in the Antelope Valley Groundwater Basin in 2006 were estimated at 2,230 feet above mean sea level (RWMG 2013) or 120 feet below ground surface (bgs) at the site. No testing of the underlying groundwater was conducted and is not warranted as the soil testing did not indicate the presence of contamination on near-surface soils.

CRLA-63

As provided on page 4.8-4 of the Draft EIR, "SWPPP" is an acronym for Storm Water Pollution Prevention Plan. The SWPPP is required for coverage under the NPDES Construction General Permit. It identifies the temporary best management practices (BMPs) to reduce storm water pollutants that would have to be implemented by the contractor during construction activities on sites of one acre or larger. The specific requirements for preparation and implementation of an SWPPP are outlined in the State Water Resources Control Board's (SWRCB's) National Pollutant Discharge Elimination System (NPDES) General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities (Order No. 2009-0009-DWQ, as amended by Order No. 2010-0014-DWQ and Order No. 2012-0006-DWQ). As the SWPPP is prepared by the

contractor and submitted to the SWRCB (and the local jurisdiction, if required) just before the start of construction and when final building plans are completed, it will not be available at the time the Final EIR is completed.

CRLA-64

As indicated above, the SWPPP includes temporary BMPs to be implemented during construction. There is a menu of sediment control, erosion control, wind erosion control, tracking control, waste management and materials pollution control, and non-stormwater management BMPs; from this, the contractor chooses which ones are suitable for the site and the Project. Preparation of an SWPPP at this time would be based on preliminary plans and schedules that would not accurately describe conditions at the time that construction of the Project begins. Also, if the County identifies the BMPs that should be implemented at the site at this time, the future selected contractor may propose different but comparable BMPs that he/she would commit to implementing. Thus, while an SWPPP can be prepared for the Project as part of the Final EIR, it would not be useful and is likely to change at the time that construction of the Project begins.

CRLA-65

There is a host of regulations related to the disposal of hazardous materials; those relevant to the Project are discussed in Section 4.7, Hazards and Hazardous Materials. The Project would need to comply with applicable regulations that are listed in Section 4.7.4 and the mitigation measures in Section 4.7.7. In addition, regulations related to hydrology and water quality are discussed in Section 4.8, Hydrology and Water Quality. The Project would need to comply with applicable regulations that are listed in Section 4.8.5. These RRs and MMs would prevent hazardous wastes and/or pollutants from being discharged into the storm water.

As demonstrated in Section 4.7, Hazards and Hazardous Materials, the transport of hazardous wastes would have to be made in accordance with applicable State and federal requirements, including U.S. Department of Transportation regulations listed in the *Code of Federal Regulations* (i.e., Title 49, Hazardous Materials Transportation Act); California Department of Transportation (Caltrans) standards; and the California Occupational Safety and Health Administration (CalOSHA) standards (RR HAZ-1). All construction activities that disturb hazardous materials must prepare hazardous waste manifest documentation that denotes the custody of the removed material, transport, and final destination of disposal. Such operations must be conducted by qualified and licensed contractors and operators. The carrier has the responsibility of storing, packing, handling, and transporting the hazardous material in a way that protects against risks to life, property, and the environment. Emergency training is required for the carrier's employees and emergency response and communication procedures have to be set, so that, in the event that accidents happen during the transport of hazardous wastes, hazards to life, property, and the environment are minimized. Also, it is anticipated that construction trucks, including those transporting hazardous wastes, would use designated truck routes, as required by the City of Lancaster (RR TRA-3). Due to the location of the site, it is likely that trucks would use West Avenue I to get to SR-14 as the most direct route to regional freeway system. As stated on page 4.7-17, there would be no need to pass through local residential streets and residential neighborhoods or utilize local streets where schools are located.

Long-term impacts are discussed under each threshold on pages 4.7-15 through 4.7-19, which generally state that compliance with existing hazardous material regulations (RR HAZ-1 through RR HAZ-3) would prevent accidental releases and undue hazards. The disposal of hazardous wastes would be made in compliance with the Subtitle C of the Resource Conservation and Recovery Act (RCRA) (RR HAZ-2) and other applicable regulations. Upon the conclusion of

construction, the resulting facility must comply with indoor air quality standards for inhabitable spaces. Hazardous wastes from the Project site would only be disposed at landfills and facilities allowed to accept such wastes. These facilities operate under permit conditions that prevent health and safety hazards to residents. Impacts would be less than significant and no mitigation for the transport of hazardous waste is required.

CRLA-66

As demonstrated on page 4.7-14, as part of the Phase II ESA, the soils beneath the equipment at the central plant were tested to determine if subsurface soil contamination has occurred. Sampling occurred in 2015 and did not detect impacts requiring further action (Converse 2015). While the testing showed that no soil contamination is present, the hydraulic oil stains on the asphalt/concrete areas would have to be removed and disposed of in accordance with RR HAZ-1. Soil testing near the hole punch machine location was performed in January 2016, which indicated no significant contamination findings (Converse 2016b). No further assessment is required.

CRLA-67

Please refer to the response for CRLA-65 above.

CRLA-68

The Asbestos and Lead Based Paint Survey Report included the original survey of 16 barracks buildings, approximately 20 surrounding and adjoining buildings, and a utility tunnel. The scope of the survey was subsequently expanded to include 15 additional, older buildings at the Mira Loma Detention Facility. Thus, all buildings at the MLDC have been included in the Asbestos and Lead Based Paint Survey Report, which is provided in Appendix E-2 of the Draft EIR.

As demonstrated in Section 4.7, Hazards and Hazardous Materials, of the Draft EIR, RR HAZ-4 requires that any Project-related demolition activities that have the potential to expose construction workers and/or the public to asbestos-containing materials (ACMs) or lead-based paint (LBP) will be conducted in accordance with applicable regulations, including, but not limited to:

- AVAQMD Rule 1403
- *California Health and Safety Code* (Section 39650 et seq.)
- *California Code of Regulations* (Title 8, Section 1529)
- California Occupational Safety and Health Administration (CalOSHA) regulations (*California Code of Regulations*, Title 8, Section 1529 [Asbestos] and Section 1532.1 [Lead])

ACM sampling was made on suspect ACMs in each building but not all building components need to be sampled. In addition, a negative result on the first ACM testing may not necessarily prove that the suspect material does not contain asbestos as only a part of the material was tested. Thus, additional testing was made on samples with negative results with the appropriate number of bulk samples to meet the definition of a negative material. The findings of the Asbestos and Lead Based Paint Survey Report would inform the handling of ACMs during the demolition or renovation of buildings.

Materials that would be impacted by the Project have been surveyed and tested to the extent possible by certified and experienced asbestos consultants. While the Project's intent is to identify

all possible hazardous materials through surveying, including selective demolition, there is the potential that some materials can be discovered below the surface of cover materials and/or simply encountered as an unforeseeable condition during demolition or renovation activities. In that event, MM HAZ-1 serves as the protocol which must be adhered to until further investigation results in a determination of the suspect materials hazardous status.

MM HAZ-1 requires that, in the event that suspect building materials that have not been previously sampled are observed during renovation/remodeling activities, these materials should be assumed to contain asbestos, until such time that they can be accessed, sampled, and evaluated for asbestos content. The suspect building materials that are not evaluated for asbestos shall be handled, removed, transported, and disposed of in compliance with existing regulations that would allow for the proper removal and disposal of ACMs and asbestos-containing construction materials (ACCMs), including AVAQMD Rule 1403 and CalOSHA regulations on asbestos abatement (RR HAZ-4).

Also, there are buildings that would not be demolished or renovated but reused as part of the Project. As some of these buildings may contain ACMs, MM HAZ-1 requires an Operations and Maintenance (O&M) Plan for asbestos observation, inspection, and documentation to ensure that ACMs do not become damaged and do not result in airborne asbestos fiber release over time. MM HAZ-1 would protect inmates and employees at the MLWDC from hazards associated with ACMs.

CRLA-69

As required by RR HAZ-4, the Project shall comply with Title 8, Section 1532.1 of the *California Code of Regulations*, which regulates the exposure of construction crews to lead. These regulations set the allowable exposure limit and include exposure assessment; standards for respiratory protection and protective clothing and equipment; and medical testing. In addition, the USEPA issued its Lead Renovation, Repair & Painting (RRP) rules, which includes work practices in the handling of materials containing lead. As stated in Section 4.7, Hazards and Hazardous Materials, intact lead-painted surfaces can be maintained in place in accordance with Title 8 and Title 17 of the California Code of Regulations and the USEPA's Lead RRP Rule.

The Asbestos and Lead Based Paint Survey Report included the original survey of 16 barracks buildings, approximately 20 surrounding and adjoining buildings, and a utility tunnel. The scope of the survey was subsequently expanded to include 15 additional, older buildings at the Mira Loma Detention Facility. Thus, all buildings at the MLDC have been included in the Asbestos and Lead Based Paint Survey Report, which is provided in Appendix E-2 of the Draft EIR.

Materials that are considered to be impacted by the scope of the Project have been surveyed and tested to the extent possible by certified and experienced California Department of Public Health Lead Inspector/Assessors. While the Project's intent is to identify all possible hazardous materials through surveying, including selective demolition, there is the potential that some materials can be discovered below the surface of cover materials and/or simply encountered as an unforeseeable condition. In this event, MM HAZ-2 serves as the protocol which must be adhered to until further investigation results in a determination of the suspect material's hazardous status. MM HAZ-2 requires that, in the event that painted or ceramic surfaces materials are encountered during demolition and renovation activities that are suspected of containing lead and/or lead-based paint, these materials shall be assumed to contain lead in concentrations exceeding the Los Angeles County Department of Health Services' definition of 0.7 milligrams per square centimeter (mg/cm², or 600 parts per million) and shall be handled, removed, transported and/or disposed of in accordance with applicable regulations for lead content, until such time that they

can be sampled and evaluated for lead content. This is a conservative way of handling materials that may or may not contain lead.

CRLA-70

As demonstrated in Section 4.7, Hazards and Hazardous Materials, of the Draft EIR, asbestos is a known human carcinogen, and the USEPA and California Environmental Protection Agency (CalEPA) have identified asbestos as a hazardous air pollutant. Existing regulations prohibit emissions of asbestos from demolition or construction activities; require medical examinations and monitoring of employees engaged in activities that could disturb asbestos; specify precautions and safe work practices that must be followed to minimize the potential for release of asbestos fibers; and require notice to federal and local government agencies prior to beginning renovation or demolition that could disturb asbestos. The disturbance of asbestos-containing materials could lead to the release of asbestos fibers, and the inhalation or swallowing of these asbestos fibers could result in a health hazard.

As the Project includes the rehabilitation and reuse of existing buildings, there would be structures that would remain and that may contain asbestos-containing materials in areas that are not exposed or a covered by other materials. These would not pose a hazard for inhalation or swallowing of the asbestos fibers and thus, need not be removed. Considering that some asbestos-containing materials would remain, MM HAZ-1 requires these materials be managed through an O&M Plan. The O&M Plan shall include periodic observations, inspections, and documentation that would allow for detection of concerns (e.g., damage to potential asbestos-containing materials that may result in airborne asbestos) and appropriate follow-up actions or removals that may be necessary to prevent airborne asbestos. Subsequent removals would have to be made in accordance with RR HAZ-4.

CRLA-71

RR HAZ-5 requires new construction, excavations, and/or new utility lines within 10 feet of crossing existing high pressure pipelines, natural gas/petroleum pipelines, and/or electrical lines greater than 60,000 volts to be designed and constructed in accordance with the *California Code of Regulations* (Title 8, Section 1541). This regulation includes notification of the owners/operators of high priority¹ subsurface installations; subsurface installation locating activities by trained excavators; and the responsibility of the excavators to prevent undue hazards from accidental damage to underground utility lines. Notification of utility line owners/operators is often followed by the owner/operator providing guidelines for work near their utility lines or their monitoring of excavation work near their lines. Thus, compliance with RR HAZ-5 would prevent damage to subsurface utility lines.

CRLA-72

Review of April 2015 aerial photographs shows the site for the proposed elementary school to be vacant. In recent discussions with the City of Lancaster Planning Department staff, this site is zoned for future school use when the surrounding area develops, but the school is not yet constructed (Rosenstein 2016).

¹ Examples of "high priority" subsurface installations include high pressure pipelines, natural gas/petroleum pipelines, and electrical lines greater than 60,000 volts.

CRLA-73

Please refer to the response for CRLA-65 above.

CRLA-74

Additional testing for potential contamination at the Project site has been conducted. Two soil sampling events have occurred: one sampling event for the Phase II ESA – March 9, 2015 (Appendix E-3 of the Draft EIR) and an additional sampling event documented in the Supplemental Phase II ESA-January 7, 2016 (Appendix F of the Final EIR). Soil borings collected in the area of the possible former location of the airstrip did not detect any contaminants that would require further action. As no hazards are present, mitigation is not required. The County will contact and coordinate with all pertinent agencies having jurisdiction on this issue.

CRLA-75

The Phase II ESA is included in Appendix E-3 of the Draft EIR and shows the location (Figure 2) and results (Tables) of 14 soil borings to depths of 8 feet bgs. All soil samples from two and four feet bgs were analyzed for TPH, VOCs, and metals in accordance with USEPA Test Methods 8015M, 8260B, and 6010B/7471A, respectively. The findings of the Phase II ESA are summarized in Section 4.7, Hazards and Hazardous Materials, of the Draft EIR. As stated on page 4.7-18, the soil analyses indicate that no VOCs are present in the soil samples. All reported metals, except arsenic, were found to be at levels below the CHHSLs for both residential and commercial/industrial land. The arsenic levels are below the background level of 12 mg/kg level that the DTSC has determined to be naturally occurring background levels at school sites in California.

CRLA-76

As provided in the Phase II ESA (included in Appendix E-3 of the Draft EIR), TPH was investigated in accordance with USEPA Test Method 8015M. Concentrations of TPH were not detected in any of the samples analyzed in the gasoline range. TPH in the diesel range (C13–C22)² and heavy hydrocarbon (oil) range (C23–C40)³ was reported in a limited number of the samples analyzed, but at concentrations below the Maximum Soil Screening Levels (MSSLs) established by the Los Angeles Regional Water Quality Control Board (RWQCB). Concentrations of TPH in the diesel and/or oil ranges exceeded the Regional Screening Levels (RSLs) for residential land use of 110 and 2,500 milligrams per kilogram (mg/kg), respectively, in 2 samples from 2 feet bgs (M1 and M10), but these concentrations are less than the RSLs for commercial/industrial land use of 600 and 33,000 mg/kg, respectively. It is suspected that the TPH concentrations in these samples may be elevated as a result of the overlying asphalt surface cover having been mixed into the samples. The Phase II ESA was prepared by a Professional Geologist and he has stated that “no further action” related to testing and analysis of concentrations of total petroleum hydrocarbons (TPH) is needed and includes a supporting justification based on applicable regulatory thresholds. No additional analysis is required.

CRLA-77

The Project site is listed in government databases due to past hazardous material uses. However, the site was never operated as a site that accepted hazardous wastes for disposal. The Project site is on the list of Leaking Underground Storage Tanks (LUST) Sites, but the leaking

² Number of carbon atoms

³ Ibid

underground storage tanks have been removed, and the affected area cleaned up. The County Department of Public Works oversaw the remediation and issued the "no further action" letter. The DTSC lists the Polaris Flight Academy with a status of "inactive-needs evaluation" (Converse 2014c). As part of the environmental site assessment conducted for the Project, soil borings collected in the area of the possible former location of the airstrip did not detect any contaminants that would require further action (Converse 2015). Thus, the listing of the site in government databases was based on past uses that no longer pose hazards.

As part of the environmental analysis for the Draft EIR, a Phase I ESA has been prepared that reviewed past and current uses and site conditions and identified Recognized Environmental Concerns (RECs) on the Project site and in the surrounding area. The Phase I ESA is provided in Appendix E-1 of the Draft EIR. Subsequent to the Phase I ESA, a Phase II ESA was prepared that included soil sampling to determine if soil contamination is present on the site. The Phase II ESA is provided in Appendix E-3 of the Draft EIR. In addition, an Asbestos and Lead Based Paint Survey Report was completed to identify the building components that contained asbestos and lead-based paint. The Asbestos and Lead Based Paint Survey Report is provided in Appendix E-2 of the Draft EIR. These reports are summarized in Section 4.7, Hazards and Hazardous Materials of the Draft EIR.

The Project must comply with existing RRs for the proper handling of hazardous wastes, including transportation, treatment, storage, and disposal; repair and/or removal of underground storage tanks based on applicable standards; and practices that would protect the demolition and construction crews from asbestos and lead exposure. In addition, the Project must incorporate MMs for the handling of suspected asbestos-containing materials and lead-based paint; an O&M Plan for regular inspection of any asbestos-containing materials; and testing and repair of underground storage tanks prior to use. Thus, existing hazardous materials and wastes would be removed from the Project site and future hazardous materials use would comply with applicable regulations to prevent hazards to future inmates. In summary, compliance with RRs and implementation of MMs set forth in the Draft EIR would prevent public health and safety hazards to inmates, employees, visitors, and other individuals at the Project site.

CRLA-78

The leak detection test is a mechanical testing procedure that determines whether a leak detection system is functioning properly and does not indicate the presence of a leak. As stated on pages 35 and 36 of the Phase I ESA, Converse reviewed the leak detection reports, which indicated that secondary containment of two USTs at the fuel station failed for the turbine sump and fill sump and that one diesel fuel UST at the power plant failed for secondary containment piping and fill sump. The same tanks have passed subsequent leak detection tests and are now considered to be in compliance.

CRLA-79

Soil sampling events occurred in 2015 (Phase II ESA-March 9, 2015 and Supplemental Phase II-January 7, 2016) in which borings were placed in areas of potential concern, as well as serving as a screening tool to evaluate past uses. Contaminants were not detected above levels that would require further action. This final opinion was rendered by a Professional Geologist.

CRLA-80

A soil sampling event occurred in 2015 (Supplemental Phase II ESA-January 7, 2016) in which a boring was completed within the boundary of the Project area, south of the vehicle fleet garage.

Contaminants were not detected above levels that would require further action. Hydraulic hoists are unregulated and are of low concern (and are located off site).

As stated on page 4.7-19 of the Draft EIR, the hydraulic hoists have the potential to have led to subsurface soil contamination at the pits of the hoists. The Phase I ESA states that, when the hydraulic hoists are removed, the soils beneath the pits shall be sampled to determine the presence of contamination. If the results of the testing show that chemical levels are present above regulatory levels, remediation and/or removal of the contamination would have to be with the oversight of applicable regulatory agencies such as the LACFD, the AVAQMD, the DTSC, and/or the USEPA in compliance with established MCLs. Also, the hoists and hydraulic oil would have to be disposed of in accordance with existing regulations for hazardous waste disposal. However, these hoists would not be used or removed by the Project and thus, would not pose hazards to the environment.

CRLA-81

Helicopters landing at and taking off from the helipad have a potential for generating fugitive dust. This occurrence would be limited to once a day for a few minutes. The helipad is paved, as is the majority of the land surrounding the area.

Please see response for CRLA-33 for information on fugitive dust impacts.

CRLA-82

The WSA for the Project, as summarized in Section 4.14, Utilities and Service Systems, discusses the adjudication of groundwater rights in the Antelope Valley and that this adjudication will provide a final allocation of groundwater rights for the long-term groundwater management of the Antelope Valley Groundwater Basin. A finite volume of groundwater that the LACWWD 40 can pump without paying penalties or replenishment fees would be assigned as part of the adjudication, and the adjudication judgment provides LACWWD 40 with the rights to pump approximately 22,500 afy to 27,000 afy of groundwater depending on factors including the amount of the Federal reserved right, which is not used by the United States, and the supplemental yield attributable to return flows from imported water purchased by LACWWD 40 and delivered to its customers. The Integrated Regional Urban Water Management Plan (IRUWMP) for the Antelope Valley projects that groundwater allocation for LACWWD 40 would be based on historical pumping amounts. The LACWWD 40 is projected to have an average annual pumping rate of 23,200 acre-feet per year (afy) from 2015 to 2035 (LACWWD 40 2011). These projections are subject to change after the adjudication has been finalized as the judgment is currently being appealed; however, it is estimated the 23,200 afy allocation is a conservative value and the final adjudicated amount could be higher, as indicated above.

As contained in the WSA, no change in the available groundwater supplies for the LACWWD 40 is projected from 2015 to 2035 (Psomas 2015). Thus, if the final adjudication judgment results in LACWWD 40 having the right to pump a greater amount, it will have the option to pump up to its allocation or pump below its allocation. This will allow the LACWWD 40 to readily provide water supply to the Project and its other customers, as well as reduce its use of imported water sources. If the final adjudication judgment results in LACWWD 40 receiving the right to pump a lower volume of groundwater, LACWWD 40 would have the option to use a greater amount of imported water or to more heavily rely on its programs for water banking; purchase of new imported supplies; water transfers; water conservation; and expansion of recycled water systems.

As indicated on page 4.14-29 of the Draft EIR, the LACWWD 40 will serve the Project with imported water purchased through the Antelope Valley East Kern Agency (AVEK). MM UTL-1 requires that the County sign the New Water Supply Entitlement Acquisition Agreement with the LACWWD 40 and pay a deposit of \$10,000 per acre-foot of annual water demand from the Project for the acquisition of additional water supplies from AVEK to serve the Project. The adjudication judgment prevents overdraft of the Antelope Valley Groundwater Basin by setting the safe yield of the basin to eliminate the long-term overdraft condition, and creates a Watermaster to enforce the terms of the judgment.

The well flow, well yield, and water quantity of the LACWWD 40 varies by well and period but the LACWWD 40's Integrated Regional Urban Water Management Plan for the Antelope Valley shows historic (2005-2009)⁴ groundwater pumping totals ranging from 12,371 afy in 2006 to 24,901 afy in 2008. The Antelope Valley Integrated Regional Water Management Plan indicates that AVEK operates a groundwater basin banking project (Water Supply Stabilization Project No. 2 [WSSP-2]) that recharges the groundwater basin with imported water during wet years when supplies exceed demands and extracts up to 90 percent of the banked water in drought years when supplies are low. LACWWD 40 participates in the WSSP-2. There is no way to determine the exact source (i.e. well water or imported water, or the particular well yield) of the water that would serve the Project site via the proposed new water pipeline extension from the on-site water lines to the existing 12-inch LACWWD 40-owned distribution pipeline within West Avenue I because LACWWD 40 waters are comingled to meet water quality and distribution requirements.

CRLA-83

Page 4.14-11 of Section 4.14, Utilities and Service Systems, states that the LACWWD 40 currently has a 36-inch-diameter, cement-lined, coated steel transmission water main located 25 feet from the property line along 60th Street West and a 12-inch-diameter pipe located within West Avenue I. The availability of water or the current drought conditions have no direct effects on this water infrastructure.

The LACWWD 40 has sufficient infrastructure to use State Water Project (SWP) water from AVEK to meet the water demands in its service area even during peak summer demand periods. The LACWWD 40 also has planned for potential water shortages through various demand management measures that would reduce water use and consumption. The WSA for the Project addresses drought conditions and states that future water supplies of the LACWWD 40 will be ensured through continued implementation programs such as water banking, purchase of new imported supplies, water transfers, water conservation, and expansion of recycled water systems.

As stated on page 4.14-8, of Section 4.14, Utilities and Service Systems, the adjudication process for the Antelope Valley Groundwater Basin acknowledges that the basin is in a state of overdraft. Allocation of groundwater rights would limit groundwater extraction in the basin to its safe yield and avoid continued overdraft conditions. As demonstrated on page 4.14-23, the LACWWD 40 has implemented a New Supply Acquisition program to provide funding for additional imported water supplies. Thus, while the Project would require water from the LACWWD 40 to operate, the LACWWD 40 will serve the Project with imported water supplies obtained through AVEK. MM UTL-1 requires that the County sign the New Water Supply Entitlement Acquisition Agreement with the LACWWD 40 and pay a deposit of \$10,000 per acre-foot of annual water demand from the Project for the acquisition of additional water supplies from AVEK to serve the Project. The WSA concludes that there is a sufficient and reliable water supply for LACWWD 40, now and into the future, including a sufficient water supply for the Project. These supplies are also sufficient to

⁴ The production statistics used are published data and more current data has not yet been published.

provide for overall growth in the LACWWD 40 service area at the rate projected in the 2010 IRUWMP (Psomas 2015).

CRLA-84

The historic water use numbers in Table 4.14-1 in Section 4.14, Utilities and Service Systems, are provided to show the amount of water pumped by on-site wells when the MLDC was in use as an Immigration and Customs Enforcement (ICE) facility until 2012. Since then, the Project site has been largely vacant and the water use has been limited. Water use data from the MLDC when it was occupied by ICE were not incorporated into the WSA analysis because the program was not in operation at the time of the issuance of the Project's Notice of Preparation (NOP). The NOP was issued in September of 2014 which, according to Section 15125 of the State CEQA Guidelines, establishes the existing physical conditions on the Project site from both a local and regional perspective and constitutes the baseline conditions by which a lead agency determines whether an impact is significant. As such, the use of water from the historic uses at the Project site are not relevant to the future proposed Project operations, and no additional analysis is required.

CRLA-85

The SWPPP must be prepared by a Qualified SWPPP Developer (QSD) and implemented by a Qualified SWPPP Practitioner (QSP) who will be responsible for monitoring that selected BMPs are in place and in working condition at the construction site. The SWPPP must include BMPs to be implemented during construction, including a Construction Site Monitoring Program (CSMP). The primary objective of the SWPPP is to ensure that the responsible party properly constructs, implements, and maintains BMPs to reduce or eliminate pollutants in storm water discharges and authorized non-storm water discharges from the construction site. The SWPPP must also outline the monitoring and sampling program to verify compliance with discharge Numeric Action Levels (NALs) set by the Construction General Permit.

Public agency monitoring of compliance with the SWPPP is provided by SWRCB inspectors who visit construction sites and verify implementation of the BMPs and compliance with other requirements of the SWPPP. In addition, the Los Angeles County Department of Public Works (LACDPW) would also be performing site inspections to monitor compliance with the approved construction plans. Any person may also report a storm water pollution problem to the SWRCB or the local agency.

As stated in Section 4.8, Hydrology and Water Quality, PDF HYD-1 requires that the on-site storm drainage system would comply with storm water quality and quality control requirements under the County's Standard Urban Stormwater Management Plan (SUSMP), Low Impact Development (LID) standards, Hydrology Manual, Best Management Practices Handbook, and Green Building Standards Code. These requirements, along with RR HYD-2, address potential pollutant runoff from long-term operations of the Project and include a drainage concept and storm water quality plan that would reduce peak storm water runoff discharge rates; conserve natural areas; minimize storm water pollutants of concern; protect slopes and channels; provide storm drain system stenciling and signage; properly design outdoor material storage areas and trash storage areas; and provide proof of ongoing maintenance of structural or treatment-control BMPs that would prevent pollutants from entering the runoff. The Project's permanent storm water treatment-control BMPs would be included in the final engineering plans for the Project and would be subject to the LACDPW review and approval as part of the plan check process, and would be inspected during construction. Code enforcement actions by the County would monitor proper and continued use of these BMPs.

CRLA-86

Please refer to the response for CRLA-6 regarding the costs of the proposed Project.

CRLA-87

The MLDC property currently and historically obtains its water supply from an on-site system of groundwater wells, pumps, and tanks, as described in Section 4.14, Utilities and Service Systems. As part of the proposed Project, a new off-site water pipeline extension will be constructed from the on-site water lines to the existing 12-inch LACWWD 40-owned distribution pipeline in West Avenue I. Existing pipeline connections to County-owned groundwater wells and reservoirs located adjacent to 60th Street West will be disconnected, and the proposed MLWDC Project site's potable water supply would be provided by LACWWD 40 rather than from the County-owned groundwater wells.

The LACWWD 40 obtains water primarily from local groundwater resources and imported water from the SWP through the AVEK. In the past few years, recycled water has been introduced to the LACWWD 40 service area by the City of Lancaster, and the Los Angeles County Sanitation District (LACSD) No. 14 continues to serve recycled water directly to Apollo Park. However, recycled water is not yet available to the Project site.

Therefore, it cannot be said that the Project will not use groundwater because the Project will be served by LACWWD 40, which sources its water supply from both groundwater and SWP water. However, the MLWDC property will no longer be connected to the County's system of wells, pumps, and tanks and will not be directly provided water via this groundwater pumping and distribution system.

The environmental impacts associated with the acquisition and development of additional imported water supplies is the responsibility of AVEK. As stated in the WSA prepared for the Project (see Appendix B of the WSA, which includes a Memorandum of Understanding [MOU] Between AVEK and LACWWD 40), which is included as Appendix G-2 of the Draft EIR:

The Waterworks District and AVEK will enter into an agreement by which the Waterworks District may require the applicant to deposit with the Waterworks District the amount of money estimated by AVEK to be necessary to fund AVEK's cost of purchasing the additional imported water supplies required by the Waterworks District as a condition of providing a service commitment to the applicant's development. Upon receipt of that deposit by the applicant, the Waterworks District will then deposit that amount with AVEK. The deposit shall cover the estimated purchase price of the additional water supplies, AVEK's cost of completing the environmental assessment under the California Environmental Quality Act and the National Environmental Policy Act (if required), and AVEK's transactional costs including document preparation and review by AVEK staff and legal counsel ("Costs").

MM UTL-1 requires that the County sign the New Water Supply Entitlement Acquisition Agreement with the LACWWD 40 and pay a deposit of \$10,000 per acre-foot of annual water demand from the Project for the acquisition of additional water supplies from AVEK to serve the Project. Therefore, the impacts on traffic and air quality from water importation are determined through the appropriate CEQA/National Environmental Policy Act (NEPA) documentation prepared by AVEK to support the procurement of additional imported water supplies.

CRLA-88

As stated in Section 4.8, Hydrology and Water Quality, and Section 4.14, Utilities and Service Systems, existing water lines connected to the on-site wells and reservoirs would provide the needed water for construction activities on site, replacing existing water use from minor maintenance and security activities. The proposed connection to the LACWWD 40's 12-inch potable water line within West Avenue I would not need to be connected in order to conduct construction activities or suppress potential dust generated by earth-moving activities because the existing and operational County-owned groundwater pumping and storage system infrastructure would be available at the Project site.

CRLA-89

The current water use at the MLDC is associated with keeping essential plumbing systems operational, as well as for general facility maintenance, groundskeeping, and upkeep. During construction, water from the existing wells will likely be used for landscaping irrigation and will be required for temporary facilities. In addition, well water will be used for dust suppression and other construction-related activities until the connection is made to the LACWWD 40's water supply. As discussed below, this use would not result in impacts to groundwater supplies or recharge.

Groundwater supplies and recharge in the Antelope Valley Groundwater Basin is highly variable and depends on the rate of pumping of various agencies and entities; it also depends on the amount of natural recharge (by rainfall and runoff) as this recharge is provided by AVEK projects (e.g., the Water Supply Stabilization Project No. 2 [WSSP-2]), which includes a 1,500-acre groundwater recharge and extraction field that recharges water from the SWP during wet years when supplies exceed demands, and extracts up to 90 percent of the banked water in drought years when supplies are low. Recharge rates would also depend on overlying soil conditions and the location and capacity of underlying aquifers.

Construction on the Project site would occur for approximately 35 months and, as shown in Table 3-4, Estimated Construction Schedule, in Section 3.0, Project Description, approximately 15 months would involve the vast majority of earth-moving activities (e.g., Demolition, Site Preparation, and Grading phases). Approximately 35,000 cubic yards (cy) of cut and fill will be balanced on site through grading activities, as stated on page 3-21 of Section 3.0, Project Description. Assuming approximately 30 gallons per cubic yard of material moved (MCAQD 2005), this would result in a total of approximately 1.05 million gallons of construction water over the course of the 15 months of earth-moving activities. This temporary requirement for water for construction activities would equate to approximately 1.08 percent of the potable water supplied through the existing County-owned wells in 2012 (i.e., 97,294,604 gallons in 2012), which was the last year of the operations of ICE at the MLDC property. Given the historic pumping at the County-owned wells, the temporary requirement of approximately one percent of historic groundwater pumping at the County-owned wells would not result in an impact to groundwater supplies or recharge rates.

CRLA-90

As demonstrated in the response for CRLA-89 above, construction water use is estimated to be approximately 1.05 million gallons of construction water over the course of the 15 months of earth-moving activities. This temporary requirement for water for construction activities would equate to approximately 1.08 percent of the potable water supplied through the existing County-owned wells in 2012 (i.e., 97,294,604 gallons in 2012), which was the last year of the operations of ICE at the MLDC property. Given the historic pumping at the County-owned wells, the temporary

requirement of approximately one percent of historic groundwater pumping at the County-owned wells would not result in an impact to groundwater supplies or recharge rates.

There would be no imported water for construction use, as stated on page 4.14-17 of Section 4.14, Utilities and Service Systems. However, as demonstrated under the response for CRLA-37, the CalEEMod input for air quality and GHG specifies watering for construction dust control and assumes the use of water trucks in the emissions calculations. Additionally, the modeling assumes ten truck roundtrips per day during the Building Construction phase to cover the delivery of materials and export of construction waste. Therefore, the analysis set forth in the Draft EIR includes a conservative analysis of truck trips and no additional analysis is required.

CRLA-91

Please refer to the response for CRLA-6 regarding the costs of the proposed Project.

CRLA-92

The MLDC property currently and historically obtains its water supply from an on-site system of groundwater wells, pumps, and tanks, as described in Section 4.14, Utilities and Service Systems. As part of the proposed Project, a new off-site water pipeline extension will be constructed from the on-site water lines to the existing 12-inch LACWWD 40-owned distribution pipeline in West Avenue I. Existing pipeline connections to County-owned groundwater wells and reservoirs located adjacent to 60th Street West will be disconnected, and the proposed MLWDC Project site's potable water supply would be provided by LACWWD 40 rather than from the County-owned groundwater wells.

The LACWWD 40 obtains water primarily from local groundwater resources and imported water from the SWP through AVEK. In the past few years, recycled water has been introduced to the LACWWD 40 service area by the City of Lancaster, and the LACSD No. 14 continues to serve recycled water directly to Apollo Park. However, recycled water is not yet available to the Project site.

Therefore, it cannot be said that the Project will not use groundwater because the Project will be served by LACWWD 40, which sources its water supply from both groundwater and SWP water. However, the MLWDC property will no longer be connected to the County's system of wells, pumps, and tanks and will not directly provide water via this groundwater pumping and distribution system.

The WSA for the Project, as summarized in Section 4.14, Utilities and Service Systems, discusses the adjudication of groundwater rights in the Antelope Valley, and that this adjudication will provide a final allocation of groundwater rights for the long-term groundwater management of the Antelope Valley Groundwater Basin. The adjudication would prevent the overdraft of the Antelope Valley Groundwater Basin by setting the safe yield of the basin to eliminate the long-term overdraft condition. As indicated on page 4.14-29 of the Draft EIR, the LACWWD 40 will serve the Project with imported water purchased through the AVEK. The Project's WSA concludes that there is a sufficient and reliable water supply for LACWWD 40, now and into the future, including a sufficient water supply for the Project (Psomas 2015). These supplies are also sufficient to provide for overall growth in the LACWWD 40 service area at the rate projected in the 2010 IRUWMP.

CRLA-93

As stated on page 4.11-5 of Section 4.11, Population and Housing, the growth projections in Table 4.11-6 are projections that were prepared by the Southern California Association of Governments (SCAG) for individual cities and counties as part of its regional planning efforts for the development of the Regional Comprehensive Plan (RCP), Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), and the Regional Housing Needs Assessment (RHNA). These projections were adopted by the SCAG Board in 2012.

The Integrated Regional Urban Water Management Plan for the Antelope Valley also includes growth projections for the service areas of the LACWWD 40 and the Quartz Hill Water District. As stated in Table 1-3 of the Integrated Regional Urban Water Management Plan, these growth projections were based on land use maps and General Plans for the cities of Palmdale and Lancaster (LACWWD 40 2011).

Because the boundaries of the SCAG projections follow city boundaries, which differ from the service area boundaries of the water districts, these projections are not comparable to the other. Still, the SCAG projections are also used in the analysis of cumulative impacts in Section 4.11.5 of the Draft EIR. The projections in the Integrated Regional Urban Water Management Plan for the Antelope Valley are used in the LACWWD 40's plans to meet future water demands in their service areas, as demonstrated in Section 4.14.7 of the Draft EIR.

CRLA-94

The Project would be staffed by Sheriff's Department security/sworn staff, Sheriff's Department civilian staff, teachers, counselors, maintenance personnel, physicians, registered nurses, registered nurse practitioners, and other County employees. There is no specific breakdown of the skills and experience of unemployed residents in the City of Lancaster. Thus, a match of the future jobs at the MLWDC and the unemployed residents cannot be readily made. However, this does not preclude Lancaster residents from taking the training or learning the skills needed to work at the Project.

CRLA-95

According to the California Department of Forestry and Fire Protection (CAL FIRE), the Very High Fire Hazard Severity zone is located at the base of the Sierra Pelona Mountains to the south, which is outside the Lancaster city boundaries. The 4.5-mile distance between this zone and the site includes relatively flat areas with urban development that are not considered to be in a Very High Fire Hazard Severity Zone area. Thus, no wildfire hazards are present on or near the site.

CRLA-96

This comment, in part, raises issues that extend beyond the scope of the CEQA requirements; nonetheless, the Board of Supervisors will receive and be able to consider it and all other comments raised before taking any action on the proposed Project. The scope of CEQA is generally limited to the evaluation of a proposed Project's potential impact on the environment, and does not extend to the impact of the existing environment on a proposed project, or on its users or residents. The applicable definition of the environment analyzed for CEQA purposes in an environmental impact report is the physical conditions in the area that are affected by the proposed project (e.g., land, air, and water). The proposed MLWDC Project's Draft EIR discloses and addresses the potential direct, indirect, and cumulative impacts of the proposed Project on

the physical environment, in accordance with the State CEQA Guidelines for all environmental issue areas.

Outdoor recreation, both active (e.g., use of sports courts, running track) and passive (e.g., sitting in courtyards or on turf grass areas), will occur on the Project site. The outdoor recreation opportunities and amenities are one of the benefits of the proposed MLWDC Project when compared to existing facilities at the CRDF. There are no known reasons to believe that risks of infection from Valley Fever from participating in outdoor recreational activities at the MLWDC site would be any different from the risks of participating in outdoor activities elsewhere in the Lancaster portion of the Antelope Valley.

CRLA-97

As shown in Exhibit 3-1 in Section 3.0, Project Description, the volleyball and basketball courts are outdoor facilities. The Project does not include an indoor gymnasium.

CRLA-98

Section 4.13, Transportation and Traffic, summarizes the findings of the Project's Traffic Impact Study. The Traffic Impact Study is provided in Appendix H of the Draft EIR. As stated on pages 4.13-2 to 4.13-3, the estimate of the Project's daily trip generation was based on specific data provided by the Los Angeles County Sheriff's Department and includes employee shift times, number of employees per shift, frequency of inmate transport buses, and miscellaneous service/delivery vehicles, among other factors. The miscellaneous vehicle trips due to service/delivery, medical delivery, and court personnel transport were estimated at no more than 25 vehicles per weekday and at ½ of this total for weekend daily trips.

The discussion of video visitation on page 4.13-20 is provided in the context of estimating the total vehicle miles travelled (VMT) as associated with the located of the MLWDC away from the highly urbanized area of Los Angeles County, but is not considered in the trip generation estimates in the Traffic Impact Study. Rather, the number of trips for inmate visitation was estimated at 39 percent of the available appointment slots or about 28,543 visits per year (the same rate as existing at the CRDF). Forecasts assume 250 inbound visitor trips and 250 outbound visitor trips per day during the 114 weekend days and holidays per year. This visitation reflects the number of visitors that is currently occurring at a detention facility that is located in the highly urbanized area of Los Angeles County. With this estimate, it is expected that video visitation would occur in addition to the in-person visits that involve personal vehicle trips to the MLWDC. Therefore, contrary to the commenter's assertion, the Project does not assume that video visitation is mitigation for increased traffic.

CRLA-99

The County does not operate the buses and trains that serve the Antelope Valley area. The Southern California Regional Rail Authority (SCRRA), which operates the Metrolink commuter rail system, and the AVTA, which operates buses, provide transit services to meet demand and generally review service routes and schedules as part of their long-range planning efforts. Should demand increase over existing levels, it will be up to the Metrolink and AVTA agencies to revise or expand their services to meet demand.

The Draft EIR acknowledges that increased driving distances would be required for some families with the Project due to the location of the site in relation to the CRDF in Lynwood, which is closer to higher density urban areas near the City of Los Angeles. The County is aware of the potential

challenges this increased distance may pose for some visiting family members, while for other visiting family members from the Lancaster and other County areas, the Project location will be closer to their homes than the current women's jail in Lynwood. As demonstrated on page 3-4, in Section 3.0, Project Description, the Board of Supervisors directed the establishment of an Advisory Board (now called the Gender Responsive Advisory Committee) that will report to the Board of Supervisors on specific programmatic and operational issues. The Advisory Committee has already begun to organize its meetings with a membership including representatives of County staff, outside agencies, advocates, organizations, individuals with incarceration experience, and representatives with expertise in reducing recidivism of female inmates. As part of its charge, the Advisory Committee is tasked with reviewing the program model for the proposed MLWDC Project to ensure that it is evidence-based in reducing recidivism; evaluating strategies to reduce negative impacts of operating the proposed MLWDC away from the downtown Los Angeles area, including contract transportation for visitors, video visiting for attorney consultation; and reviewing national best practices for visiting and family reunification.

CRLA-100

The City of Lancaster has jurisdiction over the City roadways and the implementation of bicycle lanes in the City. As stated on page 4.13-24 of Section 4.13, Transportation and Traffic, while the City of Lancaster has no existing or proposed bikeways on 60th Street West and West Avenue I along the site boundaries, roadway shoulders and sidewalks in the area may be used by bicyclists and pedestrians coming to or going from the Project site.

CRLA-101

The Draft EIR acknowledges that increased driving distances would be required for some families with the Project due to the location of the site in relation to the CRDF in Lynwood, which is closer to higher density urban areas near the City of Los Angeles. The County is aware of the potential challenges the increased distance may pose for some visiting family members, while for other visiting family members from the Lancaster and other County areas, the Project location will be closer to their homes than the current women's jail in Lynwood. As demonstrated on page 3-4, in Section 3.0, Project Description, the Board of Supervisors directed the establishment of an Advisory Board (now called the Gender Responsive Advisory Committee) that will report to the Board of Supervisors on specific programmatic and operational issues. The Advisory Committee has already begun to organize its meetings with a membership including representatives of County staff, outside agencies, advocates, organizations, individuals with incarceration experience, and representatives with expertise in reducing recidivism of female inmates. As part of its charge, the Advisory Committee is tasked with reviewing the program model for the proposed MLWDC Project to ensure that it is evidence-based in reducing recidivism; evaluating strategies to reduce negative impacts of operating the proposed MLWDC away from the downtown Los Angeles area, including contract transportation for visitors, video visiting for attorney consultation; and reviewing national best practices for visiting and family reunification.

Efforts to minimize any inconveniences of increased distance include PDF GHG-2 in Section 4.6, Greenhouse Gas Emissions. The Project will provide a combined minimum of 34 video-visiting stations on site, along with video interview rooms in transitional housing buildings. This is anticipated to reduce VMT associated with vehicle travel to the MLWDC by inmate visitors, while allowing more opportunities for video visiting than currently exist at CRDF. As of January 1, 2016, the installation of 72 video visiting stations at the Carson, East Los Angeles, Lancaster, Lakewood, Norwalk, Palmdale and San Dimas Stations has been completed. Video visiting stations are also in operation at Century Regional Detention Facility, Men's Central Jail, Pitches Detention Center (North County Correctional Facility and South Facility), Twin Towers

Correctional Facility and Los Angeles County Medical Center. Currently, the Sheriff's Department is working with software vendors to define the scope of the pilot project that will allow visitors to video conference from home or office during this calendar year.

CRLA-102

The 2014 *Mira Loma Center For Women Program Model, Education Based Incarceration* document that is cited in this comment has been reviewed, and the Sheriff's Department has not found significant differences between this document and information in the Draft EIR. The Draft EIR acknowledges that increased driving distances would be required for some families with the Project due to the location of the site in relation to the CRDF in Lynwood, which is closer to higher density urban areas near the City of Los Angeles. The County is aware of the potential challenges this increased distance may pose for some visiting family members, while for other visiting family members from the Lancaster and other County areas, the Project location will be closer to their homes than the current women's jail in Lynwood. As demonstrated on page 3-4, in Section 3.0, Project Description, the Board of Supervisors directed the establishment of an Advisory Board (now called the Gender Responsive Advisory Committee) that will report to the Board of Supervisors on specific programmatic and operational issues. The Advisory Committee has already begun to organize its meetings with a membership including representatives of County staff, outside agencies, advocates, organizations, individuals with incarceration experience, and representatives with expertise in reducing recidivism of female inmates. As part of its charge, the Advisory Committee is tasked with reviewing the program model for the proposed MLWDC Project to ensure that it is evidence-based in reducing recidivism; evaluating strategies to reduce negative impacts of operating the proposed MLWDC away from the downtown Los Angeles area, including contract transportation for visitors, video visiting for attorney consultation; and reviewing national best practices for visiting and family reunification.

Importantly, the proposed MLWDC will accommodate various forms of visitation, including traditional non-contact visiting, telephone access, video visiting, and contact visiting. Contact visits refer to opportunities for inmates and visitors to interact face to face, allowing for physical contact. Non-contact visits refer to visitations where the inmate and the visitor are separated by a glass barrier, and no physical contact is allowed. Video visits refer to long-distance visitation that can occur through a video conferencing program, allowing the inmate and the visitor to hear and see each other via the computer and screen. Therefore, video visiting is a component of a visiting program.

5 de Enero de 2016

La Junta de Supervisores del Condado de Los Ángeles
383 Kenneth Hahn Hall of Administration

500 West Temple Street
Los Angeles 90012
executiveoffice@bos.lacounty.gov
Fax: (213) 633-5100

Re: Acceso al idioma del plan preliminar del EIR para la cárcel propuesta para mujeres
(Capital Project No. 69719)

Estimado Junta de Supervisores:

Le escribimos para solicitar formalmente una traducción en español del Informe Preliminar del Impacto Ambiental (DEIR) para la cárcel propuesta para mujeres en Mira Loma Detention Center. También solicitamos que la agencia principal organice un cita adicional en español o que tengan traducción en español disponible para que miembros de la comunidad puedan participar en el proceso de comentarios públicos.

Esta fue una petición que solicitamos durante el proceso de alcance inicial. La petición no fue contestada en el proceso del preliminar del impacto ambiental (DEIR).

El incumplimiento de esta solicitud violaría leyes de derechos civiles de 1964, y las regulaciones del Título VI, que prohíbe la discriminación basada en el origen nacional, y la Orden Ejecutiva 13166 (2000), y proporcione motivos del procesamiento legal. El condado debe dar cabida a servicios de idiomas para las personas que no hablan Inglés como su idioma principal y que tienen una capacidad limitada para leer, hablar, escribir o entender Inglés.

La Agencia de Recursos Naturales de California que supervisa la Ley de Calidad Ambiental (CEQA) considera la participación del público y el comentario durante cualquier proceso de revisión ambiental como una "parte esencial del proceso de CEQA." Falta de proporcionar el acceso del idioma principal obstaculiza la participación de los miembros de la comunidad en el CEQA proceso y está sujeto a persecución legal.

Adicionalmente, el condado organizó una cita pública para el DEIR el 8 de Diciembre de 2015 sin intérpretes españoles restringiendo participación pública en el proceso de revisión ambiental.

Por favor de notificarme el día lunes 11 de Enero de 2016 si el condado va a traducir el DEIR y tener otra cita pública con intérpretes que hablen español.

NDLON-1

Respetuosamente,



Claudia Bautista
Coordinadora de Campañas Regionales
Red Nacional de Jornaleros y Jornaleras

Cc:

Michael D. Antonovich, Supervisor
Email: FifthDistrict@lacbos.org
Fax: 213-974-1010

Hilda Solis, Supervisor
Email: firstdistrict@bos.lacounty.gov
Fax: 213-613-1739

Mark Ridley-Thomas, Supervisor
Email: MarkRidley-Thomas@bos.lacounty.gov
Fax: 213-680-3283

Sheila Kuehl, Supervisor
Email: sheila@bos.lacounty.gov
Fax: 213-625-7360

Don Knabe, Supervisor
Email: don@bos.lacounty.gov
Fax: 213-626-6941

CEO Office
email: environmental@ceo.lacounty.gov

2.2.4 NATIONAL DAY LABORER ORGANIZING NETWORK (NDLON)

January 5, 2016

NDLON-1

In response to the commenter's request for Spanish translation of the Project's Draft Environmental Impact Report (EIR) and Spanish interpreters at an additional public meeting, the Los Angeles County Chief Executive Office provided a responsive letter to Californian's United for a Responsible Budget (CURB), attention to Ms. Diana Zuniga on January 22, 2016. This letter was also sent to Marcela Hernandez of the Immigrant Youth Coalition, Claudia Bautista of the National Day Laborer Organizing Network, Felicia Gomez of the California Immigrant Policy Center, and Shiu-Ming Cheer of the National Immigration Law Center in response to similar requests. Follow up communications with Ms. Zuniga even before the notice of a new comment period confirmed the date of the second public meeting as February 9, 2016. The letter to CURB and others reads as follows:

We are responding to your letter dated Friday, January 8, 2016, addressed to the Los Angeles County Board of Supervisors. You requested a response regarding "whether the County will translate the Draft Environmental Impact Report (EIR) and hold another public meeting with Spanish interpreters available" with respect to the proposed Mira Loma Women's Detention Center Renovation Project (MLWDC) at Mira Loma in Lancaster.

We appreciate that you are following the review process for the proposed MLWDC project, and respond to your requests here. The County will voluntarily add additional outreach. We will hold a second community meeting in Lancaster to discuss the Draft EIR conclusions and process and invite submission of comments. Once the location and time of the meeting has been determined, a notice in English and Spanish will be provided via a similar notification process as the November 9, 2015, release of the Draft EIR. At this meeting, we will have real time Spanish language translation available, in the event members of the public request this service. Additionally, in light of the unique nature of this detention facility project, the County also will provide a written Spanish translation of the Executive Summary of the Draft EIR. That Draft EIR section summarizes the description, location and setting of the proposed MLWDC project, the project alternatives considered, the concerns raised during the scoping process, and the potential environmental impacts. The Executive Summary also provides the entire list of proposed Project Design Features, Regulatory Requirements and Mitigation Measures. This translation will be made available at the Quartz Hill and Lancaster Libraries, Los Angeles County Public Information Office, and online for download. The County will also provide additional time to accept public comments on the Draft EIR after the written translation is available.

Throughout the California Environmental Quality Act (CEQA) review process for the MLWDC project, the County has voluntarily broadened public outreach beyond what is legally required. As you are aware, the noticed CEQA comment period closed on January 12, 2016, after being open from November 9, 2015. The County voluntarily provided an extended comment period for more than the required 45 days, to avoid any inconvenience to commenters from the holidays occurring in the comment period.

As another example of the County's broad public outreach efforts, the original scoping period was noticed to include the public and interested stakeholders early in the process, although that is not required by law. The County also held a noticed community meeting in the Lancaster community during the Draft EIR comment period, for anyone interested in learning more about the CEQA and public comment process. At that meeting, held on December 8, 2015, there was a presentation on the project description and the CEQA review and comment process. A number of speakers, including CURB, raised approximately 30 different questions at that meeting. No one attending that public community meeting asked for the assistance of a translator for themselves or others. Had they done so, County staff at the meeting would have assisted in Spanish translation.

Also, as you are aware, at the Board of Supervisors' regular meetings, Spanish translation services are available. We appreciate your comments and have responded with specific additional opportunities for public participation.

As stated above, the first of two public meetings was held to provide an overview of the Project and the conclusions of the Draft EIR on Tuesday, December 8, 2015, from 6:00 PM to 8:00 PM at the James C. Gilley Lancaster National Soccer Center Eastside Activity Center at 43000 30th Street East in Lancaster, CA 93535. There were approximately 15 attendees at the first public meeting, and some submitted written comments. Attendance at this public meeting was voluntary and was not required to submit comments on the Draft EIR.

Subsequently, in January 2016, in response to requests from the public to provide an additional extension of the public review period and an additional public meeting, a *Notice of Extended Comment Period for the Draft Environmental Impact Report for the Mira Loma Women's Detention Center Project and Notice of Second Public Meeting in Lancaster, California* (Notice) was sent to the 2015 Notice of Availability (NOA) mailing list and email list, as well as additional mailing list contacts that had provided comment letters during the Draft EIR public review period up to the time of the mailing. This Notice extended the Draft EIR public review period from Monday, February 1, 2016, through Wednesday, March 2, 2016. This 30-day extension was in addition to the original 64-day Draft EIR public review period. All written comments received on the Draft EIR from Monday, November 9, 2015, through Wednesday, March 2, 2016, were responded to in this document. Therefore, the total Draft EIR public review period for which the County received and responded to comments was 114 days.

The Notice extending the public review period was provided in both English and Spanish. Additionally, the Executive Summary of the Draft EIR was translated into Spanish and posted on the County's website for viewing and downloading. Hardcopies of the Spanish-translated Executive Summary were made available, in addition to the Draft EIR, at the Quartz Hill and Lancaster Libraries, and the Los Angeles County Public Information Office. Newspaper advertisements of the extended comment period and second public meeting were placed in the following papers and ran on Monday, February 1, 2016:

- *Acton-Aqua Dolce News*: a weekly publication so the ad was available for 7 days
- *Los Angeles Daily News*: a daily publication
- *La Opinion*: a daily publication (the ad was in both English and Spanish)
- *Antelope Valley Press*: a daily publication
- *Antelope Valley Times*: an online publication

The second public meeting was held on Tuesday, February 9, 2016, at the Lancaster Public Library at 601 West Lancaster Boulevard in Lancaster, CA 93534 to present an overview of the proposed Project and the Draft EIR process and conclusions and to invite submission of public comments on the Draft EIR. Real-time Spanish translation services were made available, as were copies of the Notice and the Executive Summary in both English and Spanish. This second public meeting had two attendees from the public. There were no requests for Spanish translation services at the second public meeting.

From: Shiu-Ming Cheer [mailto:Cheer@nilc.org]

Sent: Tuesday, January 12, 2016 4:31 PM

To: executiveoffice@bos.lacounty.gov

Cc: FifthDistrict@lacbos.org; firstdistrict@bos.lacounty.gov; MarkRidley-Thomas@bos.lacounty.gov; sheila@bos.lacounty.gov; don@bos.lacounty.gov; CEO Environmental <environmental@ceo.lacounty.gov>

Subject: Language access for Draft EIR for Proposed Women's Jail

Good Afternoon,

Attached please find the National Immigration Law Center's letter requesting language access for the draft EIR for the proposed women's jail at the Mira Loma Detention Center (Capital Project No. 69719).

} NILC-1

Sincerely,
Shiu-Ming

Shiu-Ming Cheer
Immigration Attorney
National Immigration Law Center
3435 Wilshire Bl. #2850
Los Angeles, CA 90010
213.674.2833 (o)
213.235.8269 (c)
cheer@nilc.org



BOARD of DIRECTORS

January 12, 2016

Muzaffar Chishti
Chair

Migration Policy Institute
at New York University
School of Law

Sara Gould
Vice Chair

Sophia Smith Collection,
Smith College

Allen Erenbaum
Treasurer

Erenbaum Legal
Strategies, Inc.

Hiroshi Motomura
Secretary

University of California,
Los Angeles School of Law

J. Anthony Borrego
Envisage Advisors, LLC

Richard Boswell
University of California,
Hastings College
of the Law

Lilia Garcia-Brower
Maintenance
Cooperation Trust Fund

Inez Gonzalez
California State University,
Fullerton

Robert J. Horsley
Fragomen, Del Rey,
Bersen, & Loewy, LLP

Daniel M. Kowalski
The Fowler Law Firm,
Citizenship & Visa Law Section

Emma Leheny
California Teachers Association

Ghazal Tajmiri
Orrick, Herrington
& Sutcliffe LLP

*Organizations listed for
identification purposes only*

EXECUTIVE DIRECTOR
Marielena Hincapié

Los Angeles Board of Supervisors
383 Kenneth Hahn Hall of Administration
500 West Temple Street
Los Angeles 90012
executiveoffice@bos.lacounty.gov
Fax: (213) 633-5100

Re: Language access for Draft EIR for Proposed Women’s Jail
(Capital Project No. 69719)

Dear Board of Supervisors:

We are writing to formally request a Spanish translation of the Draft Environmental Impact Report (DEIR) of the proposed women’s jail at Mira Loma Detention Center. We also request the lead agency to hold an additional public meeting in Spanish or with Spanish translation available in order for community members with limited English proficiency to participate in the public comment process.

This was a request that was submitted during the Initial Scoping Process that was not answered in the Draft Environmental Process.

Failure to meet this request would violate Civil Rights Acts of 1964, and the Title VI regulations, which prohibits discrimination based on national origin, and Executive order 13166 issued in 2000, and provide grounds for legal action¹. The County must accommodate language services for individuals who do not speak English as their primary language and who have a limited ability to read, speak, write or understand English.

The California Natural Resources Agency which oversees the Environmental Quality Act (CEQA) deems public participation and comment during any environmental review process as an “essential part of the CEQA process”. Failure to provide language access hinders residents’ meaningful participation in the CEQA review process and is subject to legal action².

NILC-1
cont.

¹ http://www.lep.gov/guidance/tips_and_tools-9-21-04.htm

² <http://www.ca-ilq.org/sites/main/files/file->

[attachments/resources_Language_Access_Guide_formatted_9-27-11_0.pdf](#)

In addition, the County hosted a public meeting for the DEIR on December 8, 2015 without Spanish interpreters further barring public participation in the environmental review process.

Please notify me whether the county will translate the DEIR and hold another public meeting with Spanish interpreters available.

Sincerely,

Shiu-Ming Cheer
Immigration Attorney
National Immigration Law Center

Cc:

Michael D. Antonovich, Supervisor
Email: FifthDistrict@lacbos.org
Fax: 213-974-1010

Hilda Solis, Supervisor
Email: firstdistrict@bos.lacounty.gov
Fax: 213-613-1739

Mark Ridley-Thomas, Supervisor
Email: MarkRidley-Thomas@bos.lacounty.gov
Fax: 213-680-3283

Sheila Kuehl, Supervisor
Email: sheila@bos.lacounty.gov
Fax: 213-625-7360

Don Knabe, Supervisor
Email: don@bos.lacounty.gov
Fax: 213-626-6941

CEO Office
email: environmental@ceo.lacounty.gov

NILC-1
cont.

2.2.5 NATIONAL IMMIGRATION LAW CENTER (NILC)

January 12, 2016

NILC-1

In response to the commenter's request for Spanish translation of the Project's Draft Environmental Impact Report (EIR) and Spanish interpreters at an additional public meeting, the Los Angeles County Chief Executive Office provided a responsive letter to Californian's United for a Responsible Budget (CURB), attention to Ms. Diana Zuniga on January 22, 2016. This letter was also sent to Marcela Hernandez of the Immigrant Youth Coalition, Claudia Bautista of the National Day Laborer Organizing Network, Felicia Gomez of the California Immigrant Policy Center, and Shiu-Ming Cheer of the National Immigration Law Center in response to similar requests. Follow up communications with Ms. Zuniga even before the notice of a new comment period confirmed the date of the second public meeting as February 9, 2016. The letter to CURB and others reads as follows:

We are responding to your letter dated Friday, January 8, 2016, addressed to the Los Angeles County Board of Supervisors. You requested a response regarding "whether the County will translate the Draft Environmental Impact Report (EIR) and hold another public meeting with Spanish interpreters available" with respect to the proposed Mira Loma Women's Detention Center Renovation Project (MLWDC) at Mira Loma in Lancaster.

We appreciate that you are following the review process for the proposed MLWDC project, and respond to your requests here. The County will voluntarily add additional outreach. We will hold a second community meeting in Lancaster to discuss the Draft EIR conclusions and process and invite submission of comments. Once the location and time of the meeting has been determined, a notice in English and Spanish will be provided via a similar notification process as the November 9, 2015, release of the Draft EIR. At this meeting, we will have real time Spanish language translation available, in the event members of the public request this service. Additionally, in light of the unique nature of this detention facility project, the County also will provide a written Spanish translation of the Executive Summary of the Draft EIR. That Draft EIR section summarizes the description, location and setting of the proposed MLWDC project, the project alternatives considered, the concerns raised during the scoping process, and the potential environmental impacts. The Executive Summary also provides the entire list of proposed Project Design Features, Regulatory Requirements and Mitigation Measures. This translation will be made available at the Quartz Hill and Lancaster Libraries, Los Angeles County Public Information Office, and online for download. The County will also provide additional time to accept public comments on the Draft EIR after the written translation is available.

Throughout the California Environmental Quality Act (CEQA) review process for the MLWDC project, the County has voluntarily broadened public outreach beyond what is legally required. As you are aware, the noticed CEQA comment period closed on January 12, 2016, after being open from November 9, 2015. The County voluntarily provided an extended comment period for more than the required 45 days, to avoid any inconvenience to commenters from the holidays occurring in the comment period.

As another example of the County's broad public outreach efforts, the original scoping period was noticed to include the public and interested stakeholders early in the process, although that is not required by law. The County also held a noticed community meeting in the Lancaster community during the Draft EIR comment period, for anyone interested in learning more about the CEQA and public comment process. At that meeting, held on December 8, 2015, there was a presentation on the project description and the CEQA review and comment process. A number of speakers, including CURB, raised approximately 30 different questions at that meeting. No one attending that public community meeting asked for the assistance of a translator for themselves or others. Had they done so, County staff at the meeting would have assisted in Spanish translation.

Also, as you are aware, at the Board of Supervisors' regular meetings, Spanish translation services are available. We appreciate your comments and have responded with specific additional opportunities for public participation.

As stated above, the first of two public meetings was held to provide an overview of the Project and the conclusions of the Draft EIR on Tuesday, December 8, 2015, from 6:00 PM to 8:00 PM at the James C. Gilley Lancaster National Soccer Center Eastside Activity Center at 43000 30th Street East in Lancaster, CA 93535. There were approximately 15 attendees at the first public meeting, and some submitted written comments. Attendance at this public meeting was voluntary and was not required to submit comments on the Draft EIR.

Subsequently, in January 2016, in response to requests from the public to provide an additional extension of the public review period and an additional public meeting, a *Notice of Extended Comment Period for the Draft Environmental Impact Report for the Mira Loma Women's Detention Center Project and Notice of Second Public Meeting in Lancaster, California* (Notice) was sent to the 2015 Notice of Availability (NOA) mailing list and email list, as well as additional mailing list contacts that had provided comment letters during the Draft EIR public review period up to the time of the mailing. This Notice extended the Draft EIR public review period from Monday, February 1, 2016, through Wednesday, March 2, 2016. This 30-day extension was in addition to the original 64-day Draft EIR public review period. All written comments received on the Draft EIR from Monday, November 9, 2015, through Wednesday, March 2, 2016, were responded to in this document. Therefore, the total Draft EIR public review period for which the County received and responded to comments was 114 days.

The Notice extending the public review period was provided in both English and Spanish. Additionally, the Executive Summary of the Draft EIR was translated into Spanish and posted on the County's website for viewing and downloading. Hardcopies of the Spanish-translated Executive Summary were made available, in addition to the Draft EIR, at the Quartz Hill and Lancaster Libraries, and the Los Angeles County Public Information Office. Newspaper advertisements of the extended comment period and second public meeting were placed in the following papers and ran on Monday, February 1, 2016:

- *Acton-Aqua Dolce News*: a weekly publication so the ad was available for 7 days
- *Los Angeles Daily News*: a daily publication
- *La Opinion*: a daily publication (the ad ran in both English and Spanish)
- *Antelope Valley Press*: a daily publication
- *Antelope Valley Times*: an online publication

The second public meeting was held on Tuesday, February 9, 2016, at the Lancaster Public Library at 601 West Lancaster Boulevard in Lancaster, CA 93534 to present an overview of the proposed Project and the Draft EIR process and conclusions, and to invite submission of public comments on the Draft EIR. Real-time Spanish translation services were made available, as were copies of the Notice and the Executive Summary in both English and Spanish. This second public meeting had two attendees from the public. There were no requests for Spanish translation services at the second public meeting.

From: Janisha Mickens [mailto:JanishaM@weingart.org]
Sent: Monday, January 11, 2016 11:12 AM
To: CEO Environmental <environmental@ceo.lacounty.gov>
Subject:

January 7, 2016

County of Los Angeles Chief Executive Office
Capital Projects/Debt Management Division
Attn: Mira Loma Women's Detention Center EIR
754 Kenneth Hahn Hall of Administration
500 West Temple Street
Los Angeles, California 90012

Dear Chief Executive Office,

We are writing in response to the Draft Environmental Impact Report (DEIR) prepared for the Mira Loma Women's Detention Center Project (MLWDC), made available on November 9, 2015. After a thorough review, we believe that the DEIR neither adequately addresses the negative environmental impacts of the project, nor does it adequately consider possible alternatives to the proposed project that would significantly reduce environmental harms.

} Weingart-1

A new jail in Lancaster will be severely detrimental to the health and wellbeing of LA County residents as well as destructive to the local environment. The EIR fails to adequately address many serious issues specific to the project site and surrounding area including Valley Fever, increased smog and traffic pollution, potential Native American resources, suitable energy sources, and water resources in the context of drought. In numerous instances, the DEIR fails to provide detailed explanations of how significant environmental impacts are reduced but instead only includes vague mitigation measures.

} Weingart-2

Additionally, the DEIR fails to consider a comprehensive list of alternatives to the MLWDC project as required by CEQA. Objective A of the project states "To prioritize the on-site integration of gender-responsive female inmate education, treatment, and vocational training to reduce female inmate recidivism" (5-7), with reducing recidivism named as a primary objective (5-7). Many experts, including our organizations, have repeatedly pointed to reports and evidence based practices that illustrate how recidivism is greatly reduced through programs that employ alternatives to imprisonment. However, suitable out-of-custody alternatives that are being increasingly implemented across the state and country are not considered in this DEIR as project alternatives, despite the fact they would satisfy the same project objectives and undoubtedly produce less harmful environmental impacts.

} Weingart-3

Please find attached a detailed list of comments addressing specific areas of the DEIR. We believe that our concerns with the inadequacy of this report, along with the detrimental environmental impacts of the MLWDC, are sufficient to warrant a rejection of the Mira Loma proposal on the basis that environmental impacts cannot be appropriately mitigated, and at the very least, a rewriting of the report to include missing analysis and information.

} Weingart-4

Sincerely,
Janisha Mickens

ATTACHMENT 1

Who will monitor the design-build process to ensure any changes made are in compliance with CEQA Guidelines? What types of changes would warrant an addendum?

} Weingart-5

What are the estimated costs of the proposed mitigation measures? Has the price tag for the jail increased? What are the total estimated expenses so far?

} Weingart-6

What are future projects in the area and how will they impact the project site? How will future projects intensify significant impacts to the environment? Please list with detail all additional relevant policies and regulations in each topic area.

} Weingart-7

4.1 AESTHETICS

Substantial adverse effect on a scenic vista:

The radio tower, when considered alone, may not significantly alter the view of scenic resources. However, its construction, which will likely require large machinery, may potentially significantly alter or block the view of scenic resources, particularly when compounded with the large water tower in the same viewshed.

} Weingart-8

Page 117, 4.1-12:

Mitigation of adverse lighting effects is proposed through MM AES-1, yet no details are provided. An EIR is required to contain "ways in which any adverse effects of such a project might be minimized" (PRC 21061). Because the specifics of a Lighting Plan are not provided, but only its intended mitigation, readers of the EIR are unable to assess the adequacy of such a plan and mitigation based on concrete data.

} Weingart-9

4.2 AIR QUALITY

The report fails to address the long-term impact of Valley Fever to prisoners, personnel, visitors and neighboring residents (i.e., the homeless shelter). The long-term impact of Valley must be analyzed as the disease is endemic to Antelope Valley.^[1] Recent findings in the article, "The Changing Epidemiology of Coccidioidomycosis in Los Angeles (LA) County, California, 1973–2011," by Ramon Guevara of the LA Department of Public Health, should be considered in the final EIR. Findings include notable changes in the epidemiology of coccidioidomycosis in LA county started in 2004 and include significant increases in case numbers and incidence rates across various demographic categories and geographic areas, a sudden and substantial rise in female cases, and collectively more annual cases in the endemic areas, especially high case numbers and incidence rates in the Antelope Valley. The county should consult with Fugitive Dust and Health and Valley Fever Scoping Group in Antelope Valley.

} Weingart-10

There is a Valley Fever "hot spot" close to the project site that requires further investigation into potential long-term impacts on people, e.g., prisoners and residents nearby. The report states

} Weingart-11

^[1] <http://journals.plos.org/plosone/article?id=10.1371/journal.pone.0136753>

that “The nine prisons and facilities identified by the CDCR as having a higher risk of exposure to Valley Fever do not include the California State Prison- Los Angeles County, located in the City of Lancaster, which is adjacent to the MLWDC Project site. As such, the CDCR has not identified the Lancaster area being a geographic location that requires screening or interventions for the State prison population with regard to exposure to Valley Fever.” Referring to CDCR’s list of high risk facilities is neither scientifically adequate nor does it have any analysis of the actual danger of contracting Valley Fever at the project site. As a counterexample, a severe and highly-publicized case of Valley Fever in California State Prison – Los Angeles County was reported on by Mother Jones this year.^[2]

Weingart-11
cont.

Rather than mitigate the contraction of Valley Fever by sensitive receptors (i.e. prisoners, staff, visitors), the DEIR states that “because the majority of the Project site will be paved or landscaped, there are few opportunities for on-site soils to produce airborne dust... The operation of the MLWDC will follow standard LASD procedures for medical care and prevention with regard to health care for inmates in general, and Valley Fever specific all [sic] and will continue to coordinate with LACDPH (Masis 2015).” The report essentially and inadequately dismisses the very real possibility of Valley Fever contraction among sensitive receptors. Antelope Valley is a high wind area, meaning that infectious spores may become airborne from surrounding soils not considered “on-site.”

Weingart-12

The report fails to consider frequent clinical misdiagnosis of coccidioidomycosis cases.^[3] How will the project ensure proper diagnosis and treatment of Valley Fever?

Weingart-13

Analysis of motor vehicle pollutant fails to consider additional traffic necessitated by services contractors and/or vendors, e.g., laundry. Since the project site will not include a laundry site, how frequent will laundry services occur? Will this service be contracted? If so, with what company and where? How will the regular travel to the jail to pick up laundry impact additional pollutants from motor vehicles? What other vendors will the project require? How will regular visits by truck from service/delivery vendors to and from the jail impact air quality? What is the estimated vehicle mileage incurred by all delivery/service trucks in two weeks?

Weingart-14

“Air quality plan” is vague. Please provide examples of potential air quality standard plans.

Weingart-15

The report states that 44% of the site will be outdoors; 1.5 out of 46 acres will be outdoor recreational space. What are the long-term impacts of potential exposure to Valley Fever during outdoor recreational activities? Where will the imported soil (for garden beds) come from? The soil must be tested and the results of which should be included in the final EIR.

Weingart-16

What soil tests have been conducted on the project site for Valley Fever specifically? What were the findings? How many, if any, tests have been completed? Who conducted the test? Please include documentation of soil testing on the project site for Valley Fever in the final EIR.

Weingart-17

What are the potential impacts of increased pollutants on the health of prisoners? What mitigation measures will be provided during outdoor recreation?

Weingart-18

What are long-term mitigation measures for Valley Fever with regard to the soccer field, running track and other outdoor recreational area?

^[2] <http://www.motherjones.com/environment/2015/01/valley-fever-california-central-valley-prison>

^[3] <http://publichealth.lacounty.gov/acd/docs/cocciRxarticle.pdf>

4.3 BIOLOGICAL RESOURCES

Pg. 155, 4.3-10

What are the few wildlife species expected to use the site? How will refurbishment of MLDC impact the habitat or movement of wildlife species?

} Weingart-19

Describe in detail how the project will directly and indirectly impact nesting habitat for migratory birds. What are the migratory patterns of birds expected to occur, and what are proposed mitigations? When do active nests occur during the year?

The project proposes to mitigate the loss of an active nest by requiring seasonal avoidance or pre-construction surveys for nesting birds. If the duration of construction is 35 months, how will the construction of this project avoid particular seasons? How will pre-construction surveys mitigate the indirect impacts of a 35 month construction period?

} Weingart-20

How will MBTA regulations be enforced and monitored for compliance during the construction phase?

154, 4.3-12

The project projects construction to begin in December 2016 for a duration of 35 months. MM BIO-1 prohibits removal of trees supporting roost sites during bat maternity roost season (March 1 to July 31). However, the demolition of bat maternity roosts will indirectly impede the use of wildlife nursery sites, as the colony will not be able to return to their nursery site.

} Weingart-21

What are the ecological impacts of removing bat maternity roosts in the area? How will the removal of colonial and solitary roosts sites impact the regional population of the bat species?

MM BIO-1 is contradictory in that it calls for the complete removal of nests in order to mitigate the project's interference of wildlife movement. MM BIO-1 is not an appropriate nor effective in reducing the impact of removing occupied bat maternity roosts.

} Weingart-22

Which program of the Los Angeles County Department of Public Works will be provided the results of the pre-construction bat habitat assessment? Will this be available to the public. I would recommend the county to include the details of this assessment in the final EIR.

} Weingart-23

The name, credentials or institutional affiliation of the Biologist(s) conducting pre-construction surveys and assessments must be disclosed. We recommend the county to seek specifically a conservation biologist.

MM BIO-2 proposes "an appropriate buffer zone" around an active nest if found. What exactly constitutes an appropriate buffer zone? Is there a standard determined by the American Institute of Biological Sciences? Will the standard be used? If not, why?

} Weingart-24

4.4. CULTURAL RESOURCES

Letters to native american consultations = appendix C-3
look at appendix C-2

Page 171, 4.4-10

The last paleontological resources record search was performed in 2008. The county must verify that no discovery of fossil localities have been recently recorded with the project site. These references must be updated by the NHMLAC.

} Weingart-25

Page 172, 4.4-11

In assessing potential effects of Native American artifacts, BonTerra Consulting only received one response. It is not indicated whether follow up was made to the remaining six individuals, as recommended by the Native American Heritage Commission. The county must ensure that all the Native American tribes and individuals are consulted, not simply informed.

} Weingart-26

Beverly Salazar Folkes informed us on December 8, 2015 that she never received the informational letter, dated February 3, 2014.

Page 180, 4.4-16

The determination of "non-contributor" to the historic designation of the Old Lock Building requires justification and further investigation. Built in 1946, it is located directly adjacent to Old Hangar 2. Its demolition potentially affects the historical significance of the site. Similarly, the Quonset Hut (built c. 1971) and Wooden Shed (built c. 1959), are also slated for demolition, but fall under the 45 year requirement for assessment as potentially warranting individual preservation as historic structures. These assessments are not provided. Additionally, demolition of these structures together for the creation of a parking lot will have a cumulative detrimental impact on the site's feeling, historic association, setting, and design.

} Weingart-27

Page 182, 4.4-18

The name, credential and/or institutional affiliation of the Paleontologist retained by the county to monitor excavations must be disclosed.

} Weingart-28

If a fossil resource is determined to be significant, any plan formulated by the paleontologist must be disclosed and detailed in the final EIR or an addendum.

What are the short-term and long-term impacts of excavation activities with regard to Valley Fever and fugitive dust? What are proposed mitigation measures for fugitive dust and exposure of Valley Fever during the excavation of native soils?

} Weingart-29

MM CUL-1 and MM CUL-2 are not sufficient mitigation measures. All pre-construction assessments/surveys must be documented in the Environmental Impact Report (EIR) to ensure compliance with CEQA Guidelines. Archaeologists and paleontologists must conduct their evaluations and submit their findings as part of the final EIR. There is no third-party monitor to ensure compliance with CEQA after the final EIR is approved. The only option to ensure compliance is to complete pre-construction assessments prior to the completion of the final EIR.

} Weingart-30

GEOLOGY AND SOILS

Page 193, 4.5-4

How will continued drought conditions and further depletion of groundwater in the area affect the project site's susceptibility to liquefaction in areas of localized perched groundwater?

} Weingart-31

Page 196, 4.5-7

Antelope Valley does experience very high winds from March through July. What are proposed mitigation measures to prevent fugitive dust and exposure of Valley Fever to the construction workers, scientific monitors, and the residents proximate to the project site during construction?

Weingart-32

Page 197, 4.5-8

Drought conditions and depletion of groundwater will continue; thus, subsidence will worsen causing damage to the foundation of the structure. How will the county propose appropriate mitigation measures given current and projected conditions? What are anticipated hazards for the prisoners residing in the jail should further subsidence occur? What are estimated operational costs for repair and maintenance of overlying structures, foundations and walls?

Weingart-33

The findings of a geotechnical investigation must be disclosed in the final EIR. The determination of "less than significant impact" must be justified in detail.

Weingart-34

GREENHOUSE GAS EMISSIONS

Page 211, 4.6-10

Water resource summary of general environmental effects of climate change does not include recent drought conditions and its exacerbation of reduced water supplies.

Weingart-35

Page 215, 4.6-14

The report states that "soil import and export are not anticipated for the Project," however, the raised garden beds for the project's on-site recreational activities "will be filled with imported soils derived from outside the Antelope and Kern Valleys" to prevent prisoners from interacting with local soil. The construction activity impacts are incorrect and must be updated in to include energy expended for soil import and export.

Weingart-36

Furthermore, the construction input data fails to account for the import of water for prevention of fugitive dust and exposure to Valley fever when breaking ground.

The construction input data fails to account for removal of hazardous waste.

The report states that "GHG emission-reduction measures for construction equipment are relatively limited." This statement requires further justification/evidence. What is the inventory of construction equipment for this project? What are the average GHG emissions of each equipment?

Weingart-37

Report states that construction will begin in November 2016. In other pages, December 2016 is the projected start date for construction.

Weingart-38

The report concludes that a separate significance finding for construction emissions is not necessary. This requires further justification and the report must provide the threshold for construction annual GHG emissions.

Weingart-39

Page 216, 4.6-15

If the design-build contractor requests an expedited schedule, the total GHG emissions would not be the same if project assumes at 5-day work week. The purported "offsetting decreases" are groundless assumptions that cannot be used to claim a reduction in total GHG emissions even if the number of work days increases. Total GHG emissions must be recalculated assuming a 6-day work week.

Weingart-40

Failure to accurately include all operational GHG emissions (e.g., vehicle emissions from service/deliver truck) requires the estimated operational annual GHG emissions to be recalculated.

Weingart-41

How was the operational annual emissions for each source area (energy, mobile, etc) calculated? How do these numbers compare to annual emissions of MLDC when it operated under Immigration and Customs Enforcement? Please provide the operational annual emissions of the facility when it was last used, and how the county determined input estimates for electricity, natural gas, water and solid waste.

Weingart-42

The conclusion that total annual estimated GHG emissions for the project would result in less than significant GHG missions is not accurate. GHG emissions must be recalculated to include all input and output data.

Weingart-43

Page 218, 4.6-17

The development of Project-specific ECRP must be created and disclosed in the final EIR to ensure compliance of mitigation. If the proposed measures of ECRP are not feasible, it is not appropriate to claim an overall reduction in GHG emissions.

Weingart-44

PDF GHG-2 projects GHG emissions reduction with the placement of video-visiting stations at the Project site. However, it is erroneous to assume that in-person visitations will decrease with the availability of video visitations. There is no evidence to prove correlation; thus, the report cannot conclude a reduction in total GHG emissions based on this assumption. In fact, given the jail site's proximity to different areas of Los Angeles and neighboring counties, one can conversely assume that family/friends, who may live in Antelope Valley or Kern County and could not previously visit their loved ones at CDRF due to the distance, will now frequent the jail.

Weingart-45

PDF GHG-3 projects GHG emissions reduction by posting AVTA bus transit and Metrolink schedules. This is illogical and inappropriate to assume that simply posting transit schedules will encourage use of public transportation. This reasoning fails to account for an array of reasons for why people are unable to use public transportation. Moreover, it is irresponsible and deceptive to then claim definitively that there will be a reduction in total annual GHG emissions (and therefore no significant impact needs to be addressed).

Weingart-46

PDF GHG-4 proposes GHG emissions reductions by providing secure on-site bicycle storage for both staff commuting and visitors. Again, this is groundless. Simply setting up bicycle storage does not guarantee a reduction in VMT associated with vehicle travel. Therefore, the project cannot assume a reduction in overall annual GHG emissions. The project acknowledges uncertainty of staffing availability in Antelope Valley, and cannot claim definitively that staff commuting would live locally. Additionally, there is only one dedicated bicycle lane in the freeway and roadway system of the project; that is, the bicycle lane only on the east side of Valley Central Way. There are no proposals by the project, city or county to expand bicycle lanes in Lancaster or Antelope Valley.

Weingart-47

Given these contradictions, the Project must recalculate total annual GHG emissions without purported "offsetting decreases". The above comments challenge the report's finding that the project would have no impact on GHG emissions.

Weingart-48

The report fails to address how conditions of climate change will affect the project's water supply and impact on Los Angeles county's water supply. Additionally, the report does not

Weingart-49

address how the spread of Coccidioidomycosis will intensify with higher temperatures, drier land, loosened soil/sand and other environmental effects of climate change. Furthermore, the report states that the degrading quality of our air will increase the spread of infectious diseases and their vectors but does not consider Valley Fever as one such infectious disease. The environmental effects of climate change will exacerbate prominence of coccidioidomycosis which is already endemic to the project site. Women are particularly vulnerable, evidence in Dr. Ramon Guevara's article published September 2015. Therefore, the Project must thoroughly assess the potential health impacts on the women who would be forced to relocate to the project site.

Weingart-49

The project must assess the environmental effects of climate change on air quality, water supply and the spread of Valley Fever.

HAZARDS AND HAZARDOUS MATERIALS

Regarding the onsite underground storage tanks at the central plant that has failed leak detection tests and has not been corrected. There is not mitigation proposed to repair or remove this underground storage tank. It is possible that over time, with use or not, hazardous waste will continue to leak and potentially contaminate the soil and groundwater.

Weingart-50

Page 229, 4.7-8

Report states that when six older USTs at the MLDC were removed, contamination was found in the soil. The soil contamination was remediated. Which county department oversaw the remediation of the contaminated soil? Please disclose this information.

Weingart-51

Minor staining of the carpet and hydraulic oil on the concrete floors beneath the emergency generator were found in 2014. Despite this, the report states that no leaks were observed. What was the minor staining on the carpet and where did the hydraulic oil come from? What led the county to conclude that no leaks were observed despite staining and presence of oil.

Weingart-52

Regarding asbestos and lead sampling, the report must justify why Building 27-29 were not sampled.

Weingart-53

Pg 232, 4.7-11

The report notes that two USTs at the fueling station were found to not have current permits and have failed leak detection tests. There are no proposed mitigations to update permits and repair/remove the leaking USTs.

Weingart-54

4.8 HYDROLOGY AND WATER QUALITY

Regarding the adjudication of groundwater rights, how might the outcome affect water supply for the proposed jail? What are the associated costs? Will the proposed jail contribute to further overdraft of groundwater in LA County, not just Antelope Valley? What is the well flow rate, well yield, water quantity and rate of replenishment of LA County Waterworks District 40 water line and Antelope Valley-East Kern Water Agency (AVEK)?

Weingart-55

The impact on Waterworks District 40 water line and supply must be considered in light of drought conditions. The entire county, not just Antelope Valley and underlying groundwater sources, is in a state of overdraft. What is the impact of this project on the water supply of Waterworks District 40 and AVEK?

Weingart-56

The historic well production statistics are outdated. The intensification of drought conditions in recent years (post 2012) warrants an updated study.

Weingart-57

How do they monitor compliance during construction? For example, the report states that compliance with NPDES Construction General Permit would ensure the project does not violate water quality standards, but during the construction process, how will water quality standards be monitored?

Weingart-58

The report states that increased storm water runoff could result in erosion if site improvements are not conducted in compliance with regulations. What third party monitor will be in place to ensure compliance during construction and operational use?

Weingart-59

What are the associated costs with a new drain system?

Weingart-60

The report states that the project will not use groundwater supplies for long-term operations. Imported and recycled water is proposed as an alternative. What are the long-term impacts of importing water on traffic and air quality? Where will the recycled water come from? Are there safety and hygiene concerns with using recycled water?

Weingart-61

Construction and disturbance of soil will occur before the new water pipeline is completed. Spraying the ground with water is proposed as a mitigation measure for Valley Fever during construction. What water supply will be used during construction?

Weingart-62

4.9 LAND USE AND PLANNING

4.10 NOISE

4.11 POPULATION AND HOUSING

Are growth projections reconciled with environmental impacts? For example, Table 4.11-6 projects an increase of ~20,000 people in 2020 (from 2008) — is this projected population considered in the long-term analysis of water usage in Lancaster?

Weingart-63

Jobs at the jails are not the type of job creation that the community needs. What percentage of the unemployed population in Lancaster would qualify as an employee of the sheriff's department?

Weingart-64

4.12 PUBLIC SERVICES AND RECREATION

Page 4.12-3

The report states "neither the project site nor the city of Lancaster is located within areas identified to have "very high fire hazard severity." However, in the Hazardous Waste section, the report claims that the project site is at least 4.5 miles from the edge of an area determined to be "very high fire hazard severity."

Weingart-65

Outdoor recreation area is required for detention facilities. However, no mitigation measures have been proposed for the outdoor recreational space (soccer field, running track and gardening areas) and potential exposure to Valley Fever and poor air quality.

Weingart-66

It is not indicated whether the full-sized sports court for volleyball and basketball is outdoor or indoor.

} Weingart-67

4.13 TRANSPORTATION AND TRAFFIC

Analysis based on Traffic Impact Study prepared by Linscott, Law and Greenspan (LLG) in April 2015. Visitation is by appointment only during weekends and holidays; traffic impacts of visitation based on review of existing visitation levels at CRDF/Lynwood as provided by the sheriffs.

} Weingart-68

Limited assessment of traffic when focusing on visitors alone. There will be an increase in traffic from service/delivery trucks and vendors.

Regarding alternative transportations, will the frequency of bus routes from LA to Lancaster increase? Is there a bus stop within .25 miles of the project site? Will there be additional bus routes created?

} Weingart-69

There is only one bicycle lane on one road near the project site. There are no proposed bikeways to facilitate transportation to the project site.

} Weingart-70

4.14 UTILITIES AND SERVICE SYSTEMS

4.15 ENERGY

Janisha Mickens, B.A.
Assistant Program Supervisor



566 S. San Pedro St. Los Angeles CA 90013
phone:213-689-2147 fax: 213-489-3108

janisham@weingart.org | <http://www.weingart.org>

Like us on Facebook: <http://www.facebook.com/weingartcenter>

Follow us on Twitter: <http://www.twitter.com/weingartcenter>

Please consider the environment before printing this email

The Weingart Center empowers and transforms lives by delivering innovative solutions to combat poverty and break the cycle of homelessness.

2.2.6 WEINGART

January 7, 2016

Weingart-1

This comment provides a general introduction to the comment letter and alleges a failure to address environmental impacts and alternatives to the Project. The Draft Environmental Impact Report (EIR) for the proposed Project has been prepared in accordance with the California Environmental Quality Act (CEQA) and the State CEQA Guidelines (14 *California Code of Regulations* [CCR]), and addresses the potential direct, indirect, and cumulative impacts of the Project on all environmental issue areas. Section 5.0, Project Alternatives, was prepared in accordance with Sections 15126.6(a) through 15126.6(f) of the State CEQA Guidelines. As demonstrated throughout the Draft EIR, all potentially significant impacts have been reduced to levels that are less than significant through the identified mitigation measures, and no significant unavoidable environmental impacts would result from Project implementation.

Weingart-2

This comment alleges that a new jail will be detrimental to the environment and residents of Los Angeles County. Although the Project site has been unoccupied since 2012, as discussed in Section 2.0, Environmental Setting, the Project site has generally been in operation and providing various detention/jail functions since 1945–1946, when the California Youth Authority began a vocational school for juvenile offenders at the site. In the mid-1950s, the Mira Loma Detention Center (MLDC) operated as a medium-security facility until it ceased operations for the first time in 1979. It reopened in 1983 and was expanded with the construction of several new buildings in 1986. The facility was repurposed for female inmates and was known as the Mira Loma Female Honor Ranch, but was closed again in 1993. The MLDC reopened for use in 1997 by the U.S. Immigration and Customs Enforcement (ICE) to house undocumented immigrants until their immigration cases were decided, and it operated in that capacity until 2012. The site has not housed inmates since that time. The MLWDC Project proposes the adaptive reuse, renovation, and expansion of the majority of the buildings at MLDC, which is an existing County asset. The redevelopment of the property as the MLWDC would avoid the costs associated with constructing a new facility.

Sections 4.1 through 4.15 of the Draft EIR provide analyses of environmental effects that could impact residents in Los Angeles County, and others potentially affected by Project implementation. Each of the environmental issues listed in the comment are fully analyzed in the Draft EIR. Valley Fever and the generation of criteria pollutants (i.e. carbon monoxide [CO]; nitrogen oxides [NOx]; volatile organic compounds [VOCs]; sulfur oxides [SOx]; respirable particulate matter less than 10 microns in diameter [PM10]; and fine particulate matter less than 2.5 microns in diameter [PM2.5]) are discussed in Section 4.2, Air Quality; Native American resources are discussed in Section 4.4, Cultural Resources; energy demands and sources are discussed in Section 4.15, Energy; and a Water Supply Assessment was prepared for the Project and included in Appendix G-2 of the Draft EIR, and summarized in Section 4.14, Utilities and Service Systems. The mitigation measures (MMs) presented in the Draft EIR are prepared in compliance with Section 15126.4 of the State CEQA Guidelines. This Final EIR, including all comments submitted to the County on the Draft EIR, will be provided to the County of Los Angeles Board of Supervisors. Therefore, your concerns will be presented directly to the decision makers prior to consideration of Project approval.

Weingart-3

This comment alleges a failure to consider a comprehensive list of alternatives to the Project, including alternatives to incarceration and out-of-custody alternatives. The Draft EIR in fact addresses alternatives in accordance with the CEQA (*California Public Resources Code*, Sections 21000 et seq.) and the State CEQA Guidelines (14 *California Code of Regulations* [CCR]). As demonstrated in Section 5.0, Project Alternatives, an EIR must describe a range of reasonable and of potentially feasible alternatives to the proposed Project, or to the location of the Project, which would feasibly attain most of the basic Project Objectives but would avoid or substantially lessen any significant effects. Based on the analyses in Sections 4.1 through 4.15 of the Draft EIR, the proposed Project would result in significant environmental effects prior to mitigation on a number of environmental topics. Following mitigation, however, impacts to all of these topical areas would be avoided or reduced to less than significant levels with the implementation of mitigation measures. No significant and unavoidable impacts would occur with the Project.

Additionally, an EIR is not required to consider alternatives that are infeasible. The range of alternatives is governed by a “rule of reason” that requires discussion of only those alternatives necessary for the County of Los Angeles Board of Supervisors (Board) to make a reasoned choice. As demonstrated in Section 3.0, Project Description, on October 22, 2013, the Board authorized the evaluation of a proposal to use a portion of the MLDC property as the site for a female detention facility in lieu of the Pitchess Detention Center (PDC) site previously proposed. In May, 2014, the Board directed that “Option 1B” be studied, as recommended in the *Los Angeles County Jail Plan Independent Review and Comprehensive Report* (Jail Plan Report). Option 1B recommended continued evaluation of renovating the facility at MLDC for a women’s detention center. The Draft EIR has been prepared to evaluate the environmental impacts of pursuing the proposed Project, in compliance with this Board of Supervisors directive.

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 this Project. Therefore, the proposed Project is consistent with the Board of Supervisor’s consideration of policy issues addressing alternative approaches to incarceration, including the commenter’s suggestions regarding out-of-custody alternatives.

The Board of Supervisors has adopted numerous recent actions to reduce the number of people who are incarcerated in Los Angeles County, particularly those with mental illness and/or substance use disorders. The Board of Supervisors’ 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 in a document entitled “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”.

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 Countywide Criminal Justice Coordination Committee. All Advisory Board members participated in the Countywide assessment of services and provided recommendations 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 of Los Angeles Chief Executive Office (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 Re-Entry (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 of Supervisors determined the Office will be a part of the Department of Health Services and the Director of the Office will report to the Director of the Department of Health Services. The Director of this Office will be 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, the Superior Court, the Public Defender, the Alternate Public Defender, Probation, the District Attorney, Mental Health, Public Health, and Health Services.

The Office will oversee Countywide diversion efforts including a system of integrated mental, physical, and public health care services and supportive housing for those at risk of homelessness who are re-directed 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 of Supervisors directed that future budget allocations be a part of the annual budget process. On September 1, 2015, the Board of Supervisors also directed that the Office distribute funding so at least 1,000 individuals would be diverted across all intercept points within the criminal justice system.

The Criminal Justice Mental Health Advisory Board report of August 2015 concluded that, even with increased opportunities for diversion from a jail environment, there will still be a need for mental health treatment in jails and that diversion efforts can reduce, but will not eliminate, the need for the County to operate detention facilities (LACDA 2015). In light of the County's diversion efforts, the Board of Supervisors directed that, for purposes of ongoing study and evaluation in the environmental review process, the maximum size of the proposed women's detention center at Mira Loma in Lancaster would remain at 1,604 beds. In addition, the Board of Supervisors reduced the maximum proposed size by approximately 1,000 beds, for purposes of the environmental review of a separate proposed treatment and detention center addressing needs of incarcerated men and women with mental illness and/or substance use disorders at the site of the current Men's Central Jail in downtown Los Angeles. In summary, the Board of Supervisors has taken steps to reduce the number of people who are incarcerated in Los Angeles County.

The Draft EIR Section 5.0, Project Alternatives, was prepared in accordance with Sections 15126.6(a) through 15126.6(f) of the State CEQA Guidelines and adequately considers alternatives to the proposed Project. Out-of-custody alternatives were not required to be analyzed

in the Draft EIR beyond the No Project alternative analyses and they would not be able to achieve the Project's primary goal, as stated below and in Section 5.3.2 of the Draft EIR.

The Project's goal is to provide detention facilities for low- to medium-security level female inmates that meet modern correctional standards and that prioritize the on-site integration of gender-responsive female inmate education, treatment, and vocational training. This goal focuses on providing a secure detention facility with cost-effective therapeutic and rehabilitative programs to meet needs of eligible female inmates in order to reduce recidivism.

Potential environmental impacts associated with "no action" on the proposed Project are described in Alternative 1A, No Project/Continuation of Existing Operations, and Alternative 1B, No Project/Predictable Actions, as demonstrated in Section 5.0, Alternatives. These alternatives provide information regarding the potential impacts to the environment if the County does not move forward with the proposed Project. This Final EIR, including all comments submitted to the County on the Draft EIR, will be provided to the County of Los Angeles Board of Supervisors. Therefore, your concerns will be presented directly to the decision makers prior to consideration of Project approval.

Weingart-4

This comment provides a general concern that the Draft EIR is inadequate. Responses to the detailed list of comments are provided below beginning with the response for the comment marked Weingart-5.

Weingart-5

The mitigation measures (MMs) are set forth throughout the Draft EIR and are included in Table ES-2 in the Draft EIR's Executive Summary. Each MM includes a requirement for the timing of the implementation, as well as the required monitoring agency. This information is further documented through the Mitigation Monitoring and Reporting Program (MMRP) that is included in the Final EIR package that is presented to the Board for their review and consideration.

Section 15164 (a) of the State CEQA Guidelines states that an addendum to a previously certified EIR must be prepared if changes or additions are needed to the EIR, but none of the conditions in Section 15162 requiring a subsequent EIR have occurred. The conditions that would allow preparation of an addendum include changes to the project or the circumstances under which project would be implemented that do not require major revisions to the previous EIR or that would not result in new significant environmental effects or an increase in the severity of the identified significant effects. When new information becomes available but would not change the significant effects of the project, would not increase the severity of the impacts of the project, or would not make new mitigation measures or alternatives feasible, an addendum may also be prepared. Otherwise, a subsequent EIR or a supplement to an EIR may be needed.

Weingart-6

The estimated costs for the building of the proposed MLWDC from design to occupancy are presented in Item S-1 of the June 9, 2015, presentation to the Board of Supervisors on jail planning. In this presentation, the proposed MLWDC Project is shown to cost approximately \$123.4 million, and the costs are broken down into Assembly Bill (AB) 900 Grant Contribution, net County cost, and other funding sources. These preliminary costs include the costs associated with the mitigation measures included in the Final EIR. An updated total Project cost estimate will

be prepared for the Board of Supervisors for their consideration at the time the Final EIR and the proposed Project recommendations are presented to them for consideration. The 2015 document can be viewed at the following website: <http://file.lacounty.gov/bos/supdocs/94070.pdf>.

Weingart-7

Table 2-1, City of Lancaster Cumulative Projects, and Table 2-2, County of Los Angeles Cumulative Projects, in Section 2.0, Environmental Setting, presents a listing of projects that could potentially contribute to impacts from the proposed Project, resulting in cumulative impacts. Cumulative impacts are assessed under a stand-alone heading within each Draft EIR Section 4.1 through 4.15. Regulatory Requirements (RRs) are also included within each Draft EIR Section 4.1 through 4.15 and include applicable local, State, or federal regulations that are required independently of CEQA review and also serve to prevent the occurrence of, or reduce the significance of, potential environmental effects. Typical RRs include compliance with the provisions of the California Building Code, Antelope Valley Air Quality Management District (AVAQMD) rules, local agency requirements, and other regulations and standards. RRs are identified in the MMRP for convenience of tracking.

Weingart-8

The short-term construction impacts of a radio communications tower would not significantly affect scenic resources or result in a significant aesthetic impact. The Project site is currently vacant and there would be no site occupants to be affected by construction activities. Construction of the tower would require approximately two weeks/14 days of crane operations which is the only piece of machinery that would be visible above the rooflines of adjacent structures. An important consideration is not just whether the crane is visible, but whether it would result in a "substantial adverse effect" on scenic views. A crane is a narrow structure with a thin profile that would not hide or inhibit views of distant mountains. Short-term deployment of construction-related equipment is a common occurrence and is generally understood to be a temporary visual inconvenience. As demonstrated in Section 4.1, Aesthetics, the Project site has an institutional character due to the utilitarian nature of the facility, which is exemplified by the security fencing with barbed wire that separates various sections of the site, tall exterior flood lights, internal paved roadways and parking areas, security watch towers, and an aboveground water tank. The temporary presence of construction-related equipment would not significantly alter or block the views of scenic resources.

Weingart-9

As stated in Section 15126.4(b) of the State CEQA Guidelines, MMs may specify performance standards that would mitigate the significant effect of the project and that may be accomplished in more than one specified way. There are many ways to design exterior lighting to avoid spillover, including adjustments to heights, angles, wattage, filters, and other elements. As such, MM AES-1 includes the performance standard of requiring that properties with sensitive receptors not be significantly adversely affected by light spillover onto properties with sensitive receptors, while also ensuring that lighting levels meet the security requirements for the MLWDC. Compliance with this standard through the provision of a Lighting Plan is subject to the review and approval of the Los Angeles County Director of Public Works prior to the commencement of any on-site or off-site demolition/construction activities.

Weingart-10

This comment alleges a failure to address the long-term impact of Valley Fever to on-site and individuals living and working in the Project area. Coccidioidomycosis, also known as Valley Fever, and its potential impact on potential future inmates and County staff is discussed in Section 4.2, Air Quality. A summary of hazards associated with the fungus is provided in the Draft EIR, and it includes summaries of trends related to Valley Fever in Los Angeles County, as inventoried and reported by the Los Angeles County Department of Public Health (LACDPH), which was consulted during the preparation of the Draft EIR.

The commenter references *The Changing Epidemiology of Coccidioidomycosis in Los Angeles (LA) County, California 1973–2011*, prepared by Ramon Guevara, Tasneem Motala, and Dawn Terashita of the Los Angeles County Department of Public Health. Dr. Terashita has coordinated consulted with the County staff on the issue of Valley Fever during preparation of this EIR. This reference has been reviewed and it provides an analysis of the incidence rate of Valley Fever in Los Angeles County, including discussion of the Antelope Valley, and displays the trend of increasing cases through 2011. This information is augmented in Section 4.2, Air Quality, with more recent data, as published in the LACDPH's *2013 Annual Morbidity Report*. Information presented in the referenced report is consistent with the Draft EIR.

The Draft EIR includes an analysis of exposure hazards due to fugitive dust that may result from construction-related earth-moving activities. PDF AIR-1, which will be included in the Contractor's Specification and monitored through the MMRP, requires the distribution of materials on Valley Fever, or any updated materials as applicable, to worksite supervisors and construction workers. PDF AIR-2 and RR AIR-1, which will be included in the Contractor's Specification and monitored through the MMRP, requires compliance with Best Management Practices and AVAQMD Rule 403 for the prevention of fugitive dust and nuisance air contaminants. RR AIR-1 provides a listing of the most applicable AVAQMD Rules. Rule 403, Fugitive Dust, requires measures such as watering and control of track-out from the site, as well as submittal of a Dust Control Plan prior to the start of construction. Rule 403 requires control of fugitive dust and avoidance of nuisance, and Rule 402 prohibits the emission of quantities of air contaminants that could cause injury, detriment, nuisance, or annoyance to the public, or that endanger the comfort, repose, health or safety of the public. With implementation of RR AIR-1, on-site earth-moving activities would not result in fugitive dust that could affect adjacent off-site land uses.

As stated in RR AIR-2, the Project will be constructed in compliance with the Department of Health – Infection Control Policy Guidelines Procedure No. 918.01. Policy 918 is intended to prevent the spread of diseases that may be caused by construction-induced airborne pollution in susceptible individuals (patients, staff and the public) in Department of Health Services (DHS) facilities. The protocols and requirements mandate the designation of an Infection Control Coordinator who must review and approve infection-control plans for new construction or renovation projects to ensure a safe environment. These infection-control plans must include infection-control measures to contain dust, debris, and other elements and to protect the patients, employees, and visitors in this environment. The Infection Control Coordinator has independent authority to stop construction-related activities immediately when the public may be adversely affected by infection-control hazards generated during construction-related activities and when the infection-control precautions and/or engineering controls are inadequate to contain the hazard. As such, the Draft EIR states that exposure to Valley Fever during construction activities would be the same as exposure to dust, and, thus, should follow the requirements for the mitigation of dust. Impacts would be less than significant, and no mitigation is required.

Section 4.2, Air Quality, acknowledges that the future inmate population has the potential to be exposed to dust generated from soils within the Antelope Valley, which have the potential to contain *Coccidioides* spores. As discussed in Section 3.0, Project Description, of the Draft EIR, according to the Sheriff's Department, Assembly Bill (AB) 109 female inmates are serving an average of 423 days in custody from date of sentencing to date of release, while non-AB 109 female inmates serve an average of 107 days in custody. Therefore, the length of time that inmates would be living at the MLWDC is temporary, and is not equivalent to a permanent living circumstance or the longer sentences in state prisons that house higher-security inmates.

The Draft EIR summarizes the LACDPH 2013 *Annual Morbidity Report*, which presents the recent trends related to Valley Fever in Los Angeles County, including an increasing incidence rate for reported coccidioidomycosis cases within the last ten years. However, the overall incidence rate in the Antelope Valley was not determined to warrant changes in the County's protocol for disease prevention, notwithstanding the fact that the County health and public health officials are well educated on the condition; are familiar with its incidence in the County and elsewhere in the state; and are involved in research and education on the subject of Valley Fever.

The LACDPH has not identified the previous U.S. Immigration and Customs Enforcement (ICE) detainee population at the MLDC, the future inmate population at MLWDC, or earlier occupants at the High Desert Health System (HDHS) Multi-Ambulatory Care Center (MACC) (the adjacent hospital facility, which has relocated in Lancaster) as requiring the implementation of health screening protocols or other measures to address potential Valley Fever exposure.

Also, as demonstrated in Section 4.2, Air Quality, the California Department of Corrections and Rehabilitation (CDCR) determined the State prison facilities that are located in the geographic area where Valley Fever has been reported to be most common are: Avenal State Prison (ASP) in Kings County; Substance Abuse Treatment Facility (SATF) in Kings County; California State Prison-Corcoran (COR) in Kings County; Pleasant Valley State Prison (PVSP) in Fresno County; California Correctional Institution (CCI) in Kern County; Kern Valley State Prison (KVSP) in Kern County; North Kern State Prison (NKSP) in Kern County; and Wasco State Prison in Kern County (WSP). In 2011, 535 of the 640 reported Valley Fever cases within the CDCR (approximately 85 percent) occurred at ASP and PVSP (U.S. District Court 2013). The prisons and facilities identified by the CDCR as having a higher risk of exposure to Valley Fever do not include the California State Prison-Los Angeles County, located in the City of Lancaster, which is adjacent to the MLWDC Project site. As such, the CDCR has not identified the Lancaster area as being a geographic location that requires screening or interventions for the State prison population with regard to exposure to Valley Fever (CDCR 2013).

As discussed with the Sheriff's Department staff for the preparation of the Draft EIR, the operation of the MLWDC will follow standard Sheriff's Department procedures for medical care and prevention with regard to health care for inmates in general, and Valley Fever specifically, and the Sheriff's Department will continue to coordinate with LACDPH (Masis 2015). The LACDPH is the designated County agency with the mandate to protect health, prevent disease, and promote the health and well-being of all persons within Los Angeles County. As such, any future changes in LACDPH policies that may be made regarding Valley Fever for inmate populations will be implemented, as applicable, throughout the County jail system.

Because the future inmate population's exposure to disturbed soils would be limited to gardening activities, PDF AIR-3 in Section 4.2, Air Quality, states that the Project will import gardening soils from outside of the Antelope Valley that would be used in raised planting beds to remove gardening in native soil as a potential source of exposure to Valley Fever spores. Further, outdoor

recreational areas would be covered with landscaping, turf grass, gravel, or landscaping/wood chip ground cover that would minimize the opportunity for soils to become airborne.

The Antelope Valley has not been identified by the LACDPH, the AVAQMD, or any other governmental health agency as a region that should be avoided by the elderly, women, children, health-compromised individuals, or by any specific ethnic groups. The Antelope Valley includes the major population centers of the cities of Lancaster and Palmdale, which have an estimated 2014 combined population of approximately 314,902 people. This portion of the Antelope Valley includes a diverse population of residents that includes many individuals that could be considered to be at higher risk of complications due to infection from Valley Fever spores. As stated in Section 4.2, Air Quality, persons at the highest risk of developing disseminated Valley Fever include the very young (under 1 year old); adults over 60 years; immunocompromised individuals; people with diabetes; women in the third trimester of pregnancy; and certain ethnic groups, including African-Americans and Filipinos.

The demographics of the two cities include approximately 158,605 females (50.4 percent) and 156,297 males (49.6 percent) with a median age of approximately 30.7 years old. The racial/ethnic composition of the area is approximately 47 percent Latino, 29 percent white, 17 percent African American, and 4 percent Asian (U.S. Census Bureau 2016). As such, the temporary presence of a female inmate population into the Antelope Valley would not introduce a new or unusual demographic into the area that is not already present in the existing population of the region.

The MLWDC property is not located in an area determined to be hazardous to the health of local residents or visitors to the region. The Draft EIR concludes that the potential future inmate population's temporary placement into the Antelope Valley, which includes the inmates' participation in all indoor and outdoor activities at the MLWDC, would not constitute placement into a hazardous existing environmental setting that would require mitigation. Additionally, the operation of the proposed Project would not increase the prevalence of Valley Fever spores or otherwise exacerbate an existing environmental condition.

The LACDPH representatives participate in various community focus groups including the Fugitive Dust Group, California Cocci Collaborative, and the Centers for Disease Control's (CDC's) Cocci Public Health Working Group, in order to stay abreast of current information and resources surrounding the condition.

Weingart-11

The commenter states that there is a "hot spot" of Valley Fever near the Project site, but no source information is provided. Section 4.2, Air Quality, includes an overview of the LACDPH 2013 *Annual Morbidity Report*. Data included in this report show the incidence in Valley Fever in Service Planning Area (SPA) 1 (i.e., Antelope Valley) from 2009 to 2013. The number of incidents of Valley Fever infection spiked in 2011 in SPA 1 with 93 reported cases, which represented 30 percent of cases in Los Angeles County, with an incidence rate of 25 per 100,000 people. The incidence rate decreased to 74 reported cases in both 2012 and 2013. As such, in 2013, SPA 1 represented approximately 20.4 percent of the total reported cases in Los Angeles County, with an incidence rate of 19 per 100,000 people (LACDPH 2013). SPA 1 has the highest infection rate in Los Angeles County, which is presumed to relate to the "hot spot" referred to in the comment (LACDPH 2013).

However, the rate of Valley Fever infection in Los Angeles County, and the Antelope Valley specifically, is substantially less than in neighboring Kern County, which had a 2013 infection rate

of 276 per 100,000 people in the north valley region (KCPHSD 2016). The eastern portion of San Luis Obispo County had Valley Fever infection rates ranging from 205 to 257 per 100,000 people between 2007 and 2012 (SLOCPHD 2014). Therefore, although the Antelope Valley has the highest rates in Los Angeles County, the rates are well below rates found nearby counties where Valley Fever is endemic.

According to the Centers for Disease Control, California has areas that are categorized as “highly endemic”, “established endemic”, and “suspected endemic” for coccidioidomycosis. Los Angeles County as a whole is categorized as being “suspected endemic,” which is the same category ascribed to large areas of Nevada, New Mexico, and western Texas (CDC 2016). Highly endemic areas include Kern County and southern Arizona, including the metropolitan areas of Phoenix and Tucson. As presented in the response to Weingart-10 above, the CDCR has not identified the Lancaster area as being a geographic location that requires screening or interventions for the State prison population with regard to exposure to Valley Fever (CDCR 2013).

Weingart-12

The possibility of future inmates potentially contracting Valley Fever is not dismissed, as Section 4.2, Air Quality, acknowledges that the future inmate population has the potential to be exposed to dust generated from soils in the Antelope Valley, which have the potential to contain *Coccidioides* spores. Additionally, Section 4.2, Air Quality, acknowledges that the Project site is located adjacent to land on the east that has exposed native soils (i.e., a 2 megawatt [MW] solar array) and is situated in the context of many acres of undeveloped land and fallow farmland that could generate airborne dust during windstorms. However, the Draft EIR concludes that the potential future inmate population’s temporary placement into the Antelope Valley, which includes the inmates’ participation in all indoor and outdoor activities at the MLWDC, would not constitute placement into a hazardous existing environmental setting that would require mitigation.

Weingart-13

As discussed with the Sheriff’s Department staff for the preparation of the Draft EIR, the operation of the MLWDC will follow standard Sheriff’s Department procedures for medical care and prevention with regard to health care for inmates in general, and Valley Fever specifically, and the Sheriff’s Department will continue to coordinate with the LACDPH (Masis 2015). The LACDPH is the designated County agency with the mandate to protect health, prevent disease, and promote the health and well-being of all persons in Los Angeles County. In fact, *The Changing Epidemiology of Coccidioidomycosis in Los Angeles (LA) County, California 1973–2011*, which is referred to in the Weingart comment letter, was co-authored by Ramon Guevara, Tasneem Motala, and Dawn Terashita of the LACDPH. The LACDPH is highly aware of Valley Fever and monitors reports of any cases of the disease. As such, any future changes in LACDPH policies that may be made regarding Valley Fever for inmate populations will be implemented, as applicable, throughout the County jail system.

Weingart-14

The commenter’s assertion that emissions from service/delivery trucks are not included in the Draft EIR analysis is incorrect. As stated in the footnotes to Table 6-1, Project Trip Generation, of the Traffic Impact Study (Appendix H of the Draft EIR), “The site specific daily trip generation was derived based on detailed site programming information (employee numbers and shifts, miscellaneous delivery trucks, and inmate transport vehicles) as provided by County staff”. Employee trips were estimated at 922 daily trips (461 round-trips); inmate transport trips were

estimated at 16 daily trips (8 round-trips); and other miscellaneous trips were estimated at 100 daily trips (50 round-trips) (LLG 2015).

Laundry will be delivered to the site 3 times a week, with the actual laundering done remotely at another County facility. The Project will also receive food deliveries daily during the work week. Commissary delivery will occur once a week. These deliveries are accounted for in the estimated 100 daily service vehicle trips used in the Traffic Impact Study.

The trip generation is summarized in Section 4.13, Transportation and Traffic, which states the trip generation data includes "all trip types (i.e., staff and employees, service, and inmate visitation trips)". The calculation of mobile source input for trip generation was taken from the Project's Traffic Impact Study. Section 4.2, Air Quality, presents the results of the emission analysis using California Emissions Estimator Model (CalEEMod) Version 2013.2.2, which is a computer program that is used to calculate anticipated emissions associated with land development projects in California. Operational inputs include the year of analysis and vehicle trip generation rates. Output operational emissions data categories include area, energy, and mobile sources. Area sources are landscape maintenance equipment, consumer products, and architectural coatings used for routine maintenance. Energy emissions are from natural gas consumption. Mobile sources are the vehicles used by staff, visitors, and vendors, and include buses used for inmate transport.

Therefore, the Project's trip generation, which includes 100 daily trips for service vehicles, was included as an input into the CalEEMod air quality analysis. As shown in Table 4.2-7 of Section 4.2, Air Quality, the estimated annual operational emissions due to Project-related operations would not exceed the AVAQMD CEQA significance thresholds and potential impacts would be less than significant. In fact, emissions were well below the thresholds of significance. For example, carbon monoxide (CO) was the air contaminant with the highest annual rate of emission, and the Project was estimated to emit 18 tons per year, while the AVAQMD threshold of significance is 100 tons per year.

As described in the Project Traffic Impact Study, it is anticipated that the relocation of inmates to the MLWDC would result in additional vehicle miles traveled (VMT) by visitors on weekends and holidays, inmate buses, and by service/delivery trucks seven days per week when compared to the length of trips required for the Century Regional Detention Facility (CRDF) located in the City of Lynwood. The worst-case estimate is an increase of 2,500 VMT on a weekday and 25,700 VMT on a weekend day or holiday (LLG 2015). To account for the increased VMT, CalEEMod default trip distances were adjusted to add approximately 3.26 million annual VMT to the VMT generated with default trip distances.

Weingart-15

The commenter's concern with use of the "air quality plan" is unclear. The use of that term in Section 4.2, Air Quality, is derived from Threshold 4.2a of Appendix G of the State CEQA Guidelines, which states "A project would result in a significant adverse impact related to Air Quality if it would conflict with or obstruct implementation of the applicable air quality plan". As stated in Section 4.2.2, Existing Conditions, of Section 4.2, Air Quality, areas that are in nonattainment are required to prepare air quality plans and implement measures that will bring the region into attainment. When an area has been reclassified from nonattainment to attainment for a federal standard, the status is identified as "maintenance", and there must be a plan and measures established that will keep the region in attainment for the following ten years. For the reasons detailed on page 4.2-14 under Threshold 4.2a, the air quality plans applicable to the

Project site are the AVAQMD 2004 Ozone Attainment Plan (State and Federal) and the AVAQMD Federal 8-Hour Ozone Attainment Plan (Western Mojave Desert Non-attainment Area).

Weingart-16

Outdoor recreation, both active (e.g., use of sports courts, running track) and passive (e.g., sitting in courtyards or on turf grass areas), will occur on the Project site. The outdoor recreation opportunities and amenities are one of the benefits of the proposed MLWDC Project when compared to existing facilities at the CRDF. There are no known reasons to believe that risks of infection from Valley Fever from participating in outdoor recreational activities at the MLWDC site would be any different from the risks of participating in outdoor activities elsewhere in the Lancaster portion of the Antelope Valley.

Because the future inmate population's exposure to disturbed soils would be limited to gardening activities, PDF AIR-3 in Section 4.2, Air Quality, states that the Project will import gardening soils from outside the Antelope Valley, which would be used in raised planting beds to remove gardening in native soil as a potential source of exposure to Valley Fever spores. Vendors for garden soil are numerous and a specific provider has not been determined at this time; however, as required by PDF AIR-3, only imported gardening soil will be used at the Project site. Further, outdoor recreational areas would be covered with landscaping, turf grass, gravel or landscaping/wood chip ground cover that would minimize the opportunity for soils to become airborne.

Weingart-17

There have been no tests conducted on the Project site to measure for Valley Fever spores within on-site soils. According to the Centers for Disease Control, testing soil for *Coccidioides* (i.e., the fungus that causes Valley Fever) is not likely to be useful because the fungus is thought to be common in the soil in certain areas. A soil sample that tests positive for *Coccidioides* does not necessarily mean that the soil will release the fungus into the air and cause infection. Also, there are no commercially-available tests to detect *Coccidioides* in soil. Testing soil for *Coccidioides* is currently only done for scientific research (CDC 2016).

The majority of the Project site will be paved or landscaped, and exposure to disturbed soils would be minimized through PDF AIR-3. Section 4.2, Air Quality, acknowledges that the future inmate population has the potential to be exposed to dust generated from soils within the Antelope Valley, which have the potential to contain *Coccidioides* spores. Additionally, Section 4.2, Air Quality, acknowledges that the Project site is located adjacent to land on the east that has exposed native soils (i.e., 2 MW solar array) and is situated in the context of many acres of undeveloped land and fallow farmland that could generate airborne dust during windstorms. However, the Draft EIR concludes that the potential future inmate population's temporary placement into the Antelope Valley, which includes the inmates' participation in all indoor and outdoor activities at the MLWDC, would not constitute placement into a hazardous existing environmental setting that would require mitigation.

Weingart-18

Section 4.2, Air Quality, analyzes the potential for pollutant emissions during demolition, construction, and operation of the Project. Impacts were determined to be less than significant, with compliance with regulatory requirements (RRs) and the implementation of Project Design Features (PDFs). As stated in Response Weingart-16 above, there are no known reasons to believe that risks of infection from Valley Fever from participating in outdoor recreational activities

at the MLWDC site would be any different from the risks of participating in outdoor activities elsewhere in the Lancaster portion of the Antelope Valley.

Section 4.2, Air Quality, acknowledges that the future inmate population has the potential to be exposed to dust generated from soils within the Antelope Valley, which have the potential to contain *Coccidioides* spores. As discussed in Section 3.0, Project Description, of the Draft EIR, according to the Sheriff's Department, AB 109 female inmates are serving an average of 423 days in custody from date of sentencing to date of release, while non-AB 109 female inmates serve an average of 107 days in custody. Therefore, the length of time that inmates would be living at the MLWDC is temporary and is not equivalent to a permanent living circumstance or the longer sentences in state prisons that house higher-security inmates. The Draft EIR concludes that the potential future inmate population's temporary placement into the Antelope Valley, which includes the inmates' participation in all indoor and outdoor activities at the MLWDC, would not constitute placement into a hazardous existing environmental setting that would require mitigation.

Weingart-19

Section 4.3.2 of the Draft EIR sets forth a detailed description of the existing conditions related to the plant and animal wildlife species that may be encountered on the Project site. A few examples of wildlife species expected to use the Project site include reptiles such as side-blotched lizard (*Uta stansburiana*) and western whiptail (*Aspidoscelis tigris*); bird species such as rock pigeon (*Columba livia*), house finch (*Haemorhous mexicanus*), European starling (*Sturnus vulgaris*), mourning dove (*Zenaida macroura*), and northern mockingbird (*Mimus polyglottos*); and mammals such as deer mouse (*Peromyscus maniculatus*), Botta's pocket gopher (*Thomomys bottae*), and desert cottontail (*Sylvilagus audubonii*).

Implementation of the proposed Project would have limited impact on habitat and/or movement of wildlife species due to limited wildlife use of the Project site. As stated in Section 4.3, Biological Resources, the site is highly developed with a lack of native habitats. The Project site is entirely contained by a perimeter fence that does not allow for passage into or out of the MLDC except within secured gated areas. Therefore, the Project site does not represent an important regional movement corridor, and few wildlife species are expected to use the site. Extremely limited local movement of common wildlife species through unfenced parking areas or landscaped areas of the site may occur for foraging and dispersal. The Project's short-term and long-term construction impacts would not have an impact on any regional wildlife movement. Furthermore, the wildlife expected to use the site are expected to be highly adapted to human disturbance. Construction and ground-disturbing activities would not significantly impact habitat because there is extensive (non-specialized) habitat for these common species throughout the Project site.

Weingart-20

As stated in Section 4.3, Biological Resources, essentially all naturally occurring bird species (such as house finch) in North America are considered to be migratory and included on the list of species protected under the Migratory Bird Treaty Act (MBTA). Suitable nesting habitat for common migratory birds is present in mature trees and other structures on the Project site and in its adjacent areas, and these species could be adversely impacted either directly or indirectly during the Project's short-term construction impacts. Activities such as vegetation removal and structure demolition could potentially cause nest failure during the breeding season. Implementation of MM BIO-2, which requires nesting bird surveys and construction buffer zones for construction activities occurring during the breeding season, would reduce potential direct and indirect impacts on nesting migratory birds.

The majority of bird species expected to use the Project site can be found year round and do not migrate long distances. Bird species expected to occur such as the European starling, mourning dove, and house finch exhibit either differential or partial migration. In differential migration, migration is related to a bird's age and sex and some birds do not travel at all but remain in the same general location year round. Partial migration is when some birds (independent of age/sex) migrate, while other birds do not travel at all. MM BIO-2, which requires nesting bird surveys and construction buffer zones for construction activities occurring during the breeding season, is proposed mitigation for protecting nesting migrating birds.

Generally speaking, construction will continue unhindered by particular seasons during the calendar year. In some cases, and when feasible, particular construction activities with high potential for breeding bird impacts (such as vegetation removal) may be scheduled during the non-breeding season. If avoidance of particular construction activities during the breeding season is not feasible, MM BIO-2 would be implemented. The duration of construction activities does not have an effect on implementation of MM BIO-2. As generally summarized below, MM BIO-2 requires that protective procedures are implemented if construction is scheduled to occur during the bird nesting season:

- To the extent feasible, vegetation/tree removal shall occur during the non-breeding season for nesting birds (generally late September to early March) and nesting raptors (generally early July to late January) to avoid impacts to nesting birds and raptors. If the nature of the Project requires that work be initiated during the breeding season for nesting birds and raptors (February 1 to August 31), a pre-construction survey shall be conducted by a qualified Biologist. If the Biologist does not find any active nests within or immediately adjacent to the impact area, the vegetation clearing/construction work shall be allowed to proceed.
- If the Biologist finds an active nest within or immediately adjacent to the construction area and determines that the nest may be impacted or breeding activities substantially disrupted, the Biologist shall delineate an appropriate buffer zone around the nest and the active nest shall be protected until nesting activity has ended. Encroachment into the buffer area around a known nest shall only be allowed if the Biologist determines that the proposed activity would not disturb the nest occupants. Construction will be allowed to proceed when the qualified Biologist has determined that fledglings have left the nest or the nest has failed.

MM BIO-2 will be implemented by the qualified Biologist hired by the County or its contractor prior to the start of construction. As stated in MM BIO-2, a letter report shall be prepared and submitted to the Los Angeles County Department of Public Works to document the survey findings and recommended protective measures.

Weingart-21

Potential impacts to bat maternity roosts are analyzed under Threshold 4.3d in the Draft EIR. Construction activities on the Project site are anticipated to begin in December 2016 for a duration of 35 months. MM BIO-1 prohibits removal of trees supporting bat maternity roost sites (where bats give birth and nurse their young) during bat maternity roost season (March 1 to July 31). However, the demolition of bat maternity roosts, if present on the Project site, would indirectly impede the use of wildlife nursery sites, as the colony would not be able to return to their nursery site. However, there is low potential for bat maternity roosts on the Project site due to limited suitable habitat, the presence of human activity on the site, and a lack of open water. A potential bat maternity roost location on the Project site being removed after the maternity season would

not be considered a substantial impediment to the use of native wildlife nursery sites due to the relatively low population such roost would support in relation to the larger regional bat population.

Bat maternity roosts of any bat species may be considered native wildlife nursery sites. Common bat species, such as California myotis, form maternity colonies in places such as crevices of old snags, crevices of trees, bridges, and buildings. Impacts to multiple such active breeding colonies during the breeding season could potentially cause a decline in regional population. MM BIO-1 calls for pre-construction bat surveys and bat exclusion procedures. There is low potential for bat maternity roosts, colonial roosts, and solitary roost sites on the Project site due to limited suitable habitat, the presence of human activity on the site, and a lack of open water. Potential colonial, solitary, and maternity roost being removed from the Project site would not be considered a substantial ecological impact due to the relatively low population such roosts would support in relation to the larger regional bat population.

Weingart-22

This comment alleges that MM BIO-1 is not appropriate or effective. The portion of MM BIO-1 related to bats is intended to avoid direct impacts to maternity roosts during the breeding season. The purpose of said avoidance is to reduce potentially significant impacts to native wildlife nursery sites (bat maternity roosts) to levels considered less than significant. MM BIO-1 effectively avoids the impact of removing occupied bat maternity roosts by calling for a pre-construction bat habitat assessment of the trees and/or structures marked for potential removal/demolition prior to commencement of construction activities. If potential maternity roosts are detected during the bat habitat assessment, construction activities will not occur until the bat maternity season has ended.

Weingart-23

The implementation of MM BIO-1 would occur immediately prior to Project construction activities. Therefore, surveys would not be conducted or completed during the timeframe of the Final EIR, which must be provided to the Board of Supervisors for review and consideration prior to any decision to approve, revise, or deny the Project. As required in MM BIO-1 and MM BIO-2, only qualified biologists shall be retained to conduct the required surveys and/or assessments. County studies and reports such as the ones required by the Draft EIR would be available for public review in accordance with the California Public Records Act (CPRA), which requires that governmental records be disclosed to the public upon request, unless there is a specific reason not to do so, in accordance with exemptions within the CPRA or other state laws.

Weingart-24

MM BIO-2 requires the establishment of "an appropriate buffer zone" around an active nest, if found. An appropriate buffer zone is an area surrounding an active nest where no Project-related activities may occur. The zone is determined by a qualified Biologist who is familiar with the behavior of the birds tending to the nest. The buffer zone is specific to each particular nest and may vary from site to site depending on the construction activity, the height of the nest in a tree or other structure, the species of nesting bird, and other factors. An appropriate buffer zone is one that avoids a nest failure (through direct or indirect impacts) due to construction activities. We are unaware of a standard buffer size determined by the American Institute of Biological Sciences. The methodology set forth in MM BIO-2 is consistent with the requirements set forth for other development Projects throughout Los Angeles County that require compliance with the MBTA, which are regularly vetted through the California Department of Fish and Wildlife (CDFW) review of CEQA environmental documents.

Weingart-25

The Draft EIR relied upon a thorough search of the Vertebrate Paleontology records conducted by the Natural History Museum of Los Angeles County (NHMLAC), as documented in a letter dated June 6, 2010, and located in Appendix C-2 of the Draft EIR. As stated, the surficial deposits in the Project area are “composed exclusively of younger Quaternary Alluvium beneath soil. These types of sedimentary deposits usually do not contain significant vertebrate fossils, at least in the uppermost layers” (McLeod 2010). The NHMLAC letter goes on to state that surface grading or shallow excavations in the proposed Project area are unlikely to encounter significant vertebrate fossils in the younger Quaternary Alluvium, while deeper excavations into older deposits could uncover significant fossil vertebrate remains (McLeod 2010).

Sedimentary deposits and formations do not change over the course of five years and, even if fossils were discovered in the Project area, MM CUL-2 in the Draft EIR would remain unchanged. MM CUL-2 requires that a qualified Paleontologist be notified and retained when earth-moving activities are anticipated to impact undisturbed deposits in the older Quaternary Alluvium on the Project site (i.e., approximately five feet below ground surface or deeper). The Paleontologist shall determine, based on consultation with the County, when monitoring of grading activities is needed based on the on-site soils and final grading plans. If any fossil remains are discovered, the Paleontologist must prepare a report of the results of any findings, which would be submitted to the NHMLAC that would then update its own records and maps accordingly.

An updated records search was requested and received from the NHMLAC and their response is provided in Appendix B of this document. The only difference between the new 2016 records search and the 2010 records search is that additional fossil species have been found in the vicinity of the Project site. The camel fossil that is mentioned in the letter was found at the County's High Desert Regional Health Center (located approximately 5.5 miles east of the Project site) (McLeod 2016). However, the recommendations in the NHMLAC letter are the same as in the prior records search, and MM CUL-2 reflects the NHMLAC's recommendation. No change to the Draft EIR analysis or MM CUL-2 is required.

Weingart-26

As stated on page 4.4-11 of the Draft EIR, an inquiry was made on January 30, 2014, of the Native American Heritage Commission (NAHC) to request a review of the Sacred Lands File database regarding the possibility of Native American cultural resources and/or sacred places in the Project vicinity that are not documented in other databases. The NAHC responded on January 31, 2014, and indicated that there are not records of Native American traditional cultural places with the NAHC, but the NAHC provided a list of Native American groups and individuals who may have knowledge regarding Native American cultural resources not formally listed on any database. Subsequently, letters to Native American tribes were sent out on February 3, 2014. Beverly Folkes was sent a letter on February 3, 2014, using the address provided by the NAHC (see Appendix C-3 of the Draft EIR). Only Daniel McCarthy of San Manuel Band of Mission Indians responded via email on February 6, 2014, and stated that, given the nature and location of the Project, the San Manuel Band has no concerns (McCarthy 2014). See Appendix C of this Final EIR. No follow-up on the other tribes was made as the documentation relies on the contact information from the NAHC as the authoritative source and it is common not to receive responses from all the tribes contacted.

The Project does not require a General Plan Amendment or Specific Plan Amendment and thus, is not subject to the Native American consultation under SB 18. The Notice of Preparation (NOP) for the Project was also sent out prior to the effective date of Assembly Bill (AB) 52, which provides

a separate consultation process that can be triggered by a tribe and which applies only to projects for which the NOP scoping notice was sent on or after July 1, 2015. Thus, the County is not specifically required to notify Native American tribes under CEQA. However, information letters were sent to local tribes as part of the background research for the Project site.

It cannot be entirely discounted that archaeological resources may be present beneath the pavement, buildings, or ground surfaces. Thus, MM CUL-1 calls for a qualified Archaeologist to be retained by the County to attend the pre-grading meeting with the Construction Contractor to establish, based on the site plans, appropriate procedures for monitoring earth-moving activities during construction. The Archaeologist would determine, based on consultation with the County, when monitoring of grading activities is needed. Monitoring should observe disturbance of the uppermost layers of sediment (soils and younger Quaternary alluvium) and any archaeological resources discovered shall be salvaged and catalogued, as necessary.

Weingart-27

The comment alleges that not all contributing buildings to the Historic District have been identified. Section 4.4, Cultural Resources, includes a summary of the findings of the Historical Resources Report included in Appendix C-1 of the Draft EIR. The Report concludes that there is a historic district within the Project study area. The district, named the Polaris Flight Academy Historic District, meets the criteria for listing in the National Register of Historic Places (NRHP) and the California Register of Historical Resources (CRHR) for its direct associations with military aviation during World War II and the work of Major Corliss Champion Moseley (GPA 2015). It is therefore considered a historical resource subject to the requirements of CEQA.

It is recognized as standard methodology to evaluate groupings of buildings, structures, objects, and landscape features within a distinct geographic area with shared historic contexts as potential historic districts. One key factor in determining contributing and non-contributing resources is period of significance. Buildings constructed outside the period of significance cannot be considered contributors. Because the Historic District, in this case, is significant for its World War II history, its period of significance within this context ended in 1945. Thus, the buildings constructed after 1945 are not contributors. They were constructed for different uses by different entities.

It would have been appropriate to evaluate the three buildings (i.e., Old Lock Building, Quonset Hut, and Wooden Shed) in question individually, above and beyond their evaluations as contributors, if they had any potential to represent an important historic context as individual buildings. The contextual research into the postwar history of the property when it was used by the State and the County as a detention facility indicated no reason to conclude that the property had any other significance than its World War II significance. As a result, there is no significant historic context for the three buildings to potentially represent. The resulting evaluation would reach exactly the same conclusion: the buildings would be assigned a 6Z classification, not eligible for designation.

Furthermore, there were no buildings between the two large historic hangars during the property's period of significance, so removing the three non-contributing buildings will actually be beneficial to the ratio of contributors to non-contributors in the Historic District. Project implementation will not have a significant impact on the Historic District, and no further analysis is required.

Weingart-28

The implementation of MM CUL-2 would occur immediately prior to, and during, Project construction activities. The qualified Paleontologist would be hired by the County or its contractor prior to the start of construction. Therefore, monitoring would not be conducted or completed during the timeframe of the Final EIR, which must be provided to the Board of Supervisors for review and consideration prior to any decision to approve, revise, or deny the Project. A plan for the evaluation, recordation, recovery and/or salvage of any discovered fossil remains would be formulated by the Paleontologist at the time of the discovery based on the circumstances of the find. County studies and reports such as the ones required by the Draft EIR would be available for public review in accordance with the California Public Records Act (CPRA), which requires that governmental records be disclosed to the public upon request, unless there is a specific reason not to do so, in accordance with exemptions within the CPRA or other state laws.

Weingart-29

The Draft EIR includes an analysis of exposure hazards due to fugitive dust that may result from construction-related earth-moving activities. PDF AIR-1, which will be included in the Contractor's Specification and monitored through the MMRP, requires the distribution of materials on Valley Fever, or any updated materials as applicable, to worksite supervisors and construction workers. PDF AIR-2 and RR AIR-1, which will be included in the Contractor's Specification and monitored through the MMRP, requires compliance with Best Management Practices and AVAQMD Rule 403 for the prevention of fugitive dust and nuisance air contaminants. RR AIR-1 provides a listing of the most applicable AVAQMD Rules. Rule 403, Fugitive Dust, requires measures such as watering and control of track-out from the site, as well as submittal of a Dust Control Plan prior to the start of construction. Rule 403 requires control of fugitive dust and avoidance of nuisance, and Rule 402 prohibits the emission of quantities of air contaminants that could cause injury, detriment, nuisance, or annoyance to the public, or that endanger the comfort, repose, health or safety of the public. With implementation of RR AIR-1, on-site earth-moving activities would not result in fugitive dust that could affect adjacent off-site land uses.

As stated in RR AIR-2, the Project will be constructed in compliance with the Department of Health – Infection Control Policy Guidelines Procedure No. 918.01. Policy 918 is intended to prevent the spread of diseases that may be caused by construction-induced airborne pollution in susceptible individuals (patients, staff, and the public) in Department of Health Services (DHS) facilities. The protocols and requirements mandate the designation of an Infection Control Coordinator who must review and approve infection-control plans for new construction or renovation projects to ensure a safe environment. These infection-control plans must include infection-control measures to contain dust, debris, and other elements and to protect the patients, employees and visitors in this environment. The Infection Control Coordinator has independent authority to stop construction-related activities immediately when the public may be adversely affected by infection-control hazards generated during construction-related activities and when the infection-control precautions and/or engineering controls are inadequate to contain the hazard. As such, the Draft EIR states that exposure to Valley Fever during construction activities would be the same as exposure to dust, and, thus, should follow the requirements for the mitigation of dust. Impacts would be less than significant, and no mitigation is required.

Weingart-30

This comment alleges that MM CUL-1 and MM CUL-2 are not sufficient. MMs are set forth in the Draft EIR as required activities that must occur in order to reduce potentially significant environmental impacts. No required pre-construction activities would occur or be contracted for

until the Board of Supervisors has made a determination to approve the Project. Should the Board of Supervisors decide to modify the Project, then the MMs set forth in the Draft EIR may require changes. Should the Board of Supervisors decide to deny the Project, then there would be no need to continue with requirements set forth in the MMs.

The Project site survey that was completed for on-site archaeological resources is discussed in Section 4.4, Cultural Resources, under Thresholds 4.4b and 4.4c. BonTerra Psomas' Archaeologist Patrick Maxon, M.A., RPA, completed a pedestrian survey of the Project site on November 21, 2013. He walked all accessible open areas of the site to determine if there were exposed archaeological resources. No archaeological resources were expected as the site is largely developed with buildings, sidewalks, parking areas, roads, and other paved areas. The findings of his site survey, along with the conclusions of the Vertebrate Paleontology records conducted by the NHMLAC (see Appendix C-2 of the Draft EIR), are incorporated into the analyses in Section 4.4, Cultural Resources, under Thresholds 4.4b and 4.4c.

Section 21081.6 of CEQA and Section 15097 of the State CEQA Guidelines require a public agency to adopt an MMRP for assessing and ensuring the implementation of required mitigation measures applied to proposed projects. Specific reporting and/or monitoring requirements that will be enforced during Project implementation shall be adopted simultaneously with any final Project approval by the lead agency.

Weingart-31

As stated in Section 4.5, Geology and Soils, liquefaction is the sudden decrease in the strength of cohesionless soils due to dynamic or cyclic shaking. Saturated soils behave temporarily as a viscous fluid (liquefaction) and, consequently, lose their capacity to support structures. The potential for liquefaction decreases with increasing clay and gravel content, but increases as the ground acceleration and duration of shaking increase. Liquefaction potential has been found to be the greatest where both high groundwater and loose sands occur within 50 feet of the ground surface.

The *Geohazard Study Report* for the Project, as summarized in the Draft EIR, included a liquefaction analysis and indicates that the Project site may be susceptible to liquefaction (Converse 2014b). As such, proposed structures and infrastructure on the Project site may be exposed to liquefaction hazards, including damage to foundations; settlement of aboveground structures; and uplift of buried structures and infrastructure. Prior to the completion of final engineering design plans, additional geotechnical exploration, lab testing, and analysis may be required for planned seismic upgrades to existing buildings in order to provide detailed design recommendations. The Project's structural design, which must be completed in accordance with the recommendations of the geotechnical investigation and subject to the County Building Official, as included in RR GEO-1, would address liquefaction hazards to prevent damage to foundations, structures, and infrastructure.

Reductions in the groundwater levels are generally likely to decrease the potential for liquefaction because water would be farther from the ground surface. It is anticipated that the engineering design for the Project will account for liquefaction hazards based on soil testing that would be completed as part of RR GEO-1.

Weingart-32

As the commenter states, the Antelope Valley can be subject to periodic strong winds. High winds have the ability to transport dust and soil, which may or may not contain *Coccidioides* spores. The

Draft EIR includes an analysis of potential exposure to fugitive dust that may result from construction-related earth-moving activities. PDF AIR-1, which will be included in the Contractor's Specification and monitored through the MMRP, requires the distribution of materials on Valley Fever, or any updated materials as applicable, to worksite supervisors and construction workers. PDF AIR-2 and RR AIR-1, which will be included in the Contractor's Specification and monitored through the MMRP, requires compliance with Best Management Practices and AVAQMD Rule 403 for the prevention of fugitive dust and nuisance air contaminants. RR AIR-1 provides a listing of the most applicable AVAQMD Rules. Rule 403, Fugitive Dust, requires measures such as watering and control of track-out from the site, as well as submittal of a Dust Control Plan prior to the start of construction. Rule 403 requires control of fugitive dust and avoidance of nuisance, and Rule 402 prohibits the emission of quantities of air contaminants that could cause injury, detriment, nuisance, or annoyance to the public, or that endanger the comfort, repose, health or safety of the public. With implementation of RR AIR-1, on-site earth-moving activities would not result in fugitive dust that could affect adjacent off-site land uses.

In a letter received from the AVAQMD on this Project and included in the comment section of this Final EIR (see Section 2.1.1), the AVAQMD has concurred with the Draft EIR analysis of air quality and dust impacts.

Weingart-33

The groundwater level declines and associated land subsidence are not as severe near the Project site as in other parts of the Antelope Valley Groundwater Basin. Local survey monument bench mark records would be reviewed to determine the amount of land subsidence on or near the Project site, as part of RR GEO-1. The design of the building foundations has not been determined, as the design phase has yet to occur. However, the foundation design for new buildings or additions will be designed and constructed to appropriately address current soil conditions and characteristics identified by a California licensed geologist, a soils engineer, and a structural engineer. The design will meet code requirements, which include recognition of soil bearing pressure, seismic activity and jurisdictional building codes as well as AB 900 structural requirements. Existing facilities are monitored periodically for distress as part of facility operation and maintenance protocol, and there would be no hazards posed to the inmate or employee population.

Additionally, the Antelope Valley Groundwater Basin has been recently adjudicated through Los Angeles Superior Court case number 1-05-CV-049053: Antelope Valley Groundwater Cases, Consolidated Proceeding 4408, which determined the safe yield of groundwater extraction from the basin and allocates pumping rights accordingly to users. As such, improved water conservation measures, including recharge of reclaimed water, storm water and imported waters, and other measures in compliance with the adjudication could be expected to reduce water level declines and associated land subsidence in the region, and provided sustainable safe yields within the Antelope Valley groundwater basin.

Regarding operational costs associated with the proposed Project, the final design of the facility has not been drafted or approved, and the long-term operational costs have not yet been determined.

Weingart-34

The analysis of geologic, soils, and seismic characteristics and constraints on the Project site and surrounding area presented in Section 4.5, Geology and Soils, is based on the *Geohazard Study Report – Mira Loma Detention Center, 45100 North 60th Street West, Lancaster, California*

prepared by Converse Consultants in June 2014 and has, in fact, been fully disclosed and included as Appendix D of the Draft EIR. The conclusions of significance findings in Section 4.5, Geology and Soils, are based on the substantial evidence presented in this technical study.

Weingart-35

While the Project's estimated water demand is less than the 250 acre-feet per year (afy) threshold established by the California Department of Water Resources (DWR) for requiring a Water Supply Assessment (WSA) under Senate Bill (SB) 610, a WSA was prepared for the Project and provided in Appendix G-2 of the Draft EIR. The WSA is also summarized in Section 4.14, Utilities and Service Systems. As required under SB 610, the WSA must include an evaluation of the sufficiency of the water supplies available to the water supplier to meet existing and anticipated future demands (including the demand associated with the project) over a 20-year horizon that includes normal, single-dry, and multiple-dry years. The multiple-dry year scenario would represent drought conditions.

The WSA for the Project indicates that the Los Angeles County Department of Public Works Waterworks District 40 (LACWWD 40) would be able to meet the projected water demands in its service area, along with the Project's demands, through the next 20 years, including normal, single-dry, and multiple-dry (5-year period) years. Future demand is projected to increase within the LACWWD 40 service area, and the reliability of the LACWWD 40's future water supplies to meet demand will be ensured through continued implementation of programs for water banking; purchase of new imported supplies; water transfers; water conservation; and expansion of recycled water systems (Psomas 2015).

Thus, the potential impacts of climate change on reduced water supplies due to drought conditions has been accounted for in the WSA for the Project. The WSA was reviewed by LACWWD 40 prior to inclusion in the Draft EIR.

Weingart-36

As stated in Section 4.6, Greenhouse Gas Emissions, of the Draft EIR, "materials to be imported to and exported from the site" are accounted for in the CalEEMod calculations for the Project. Although it is anticipated that "cut and fill would be balanced on site; no import or export of soils would occur" (as stated on page 4.2-15 of the Draft EIR), the CalEEMod analysis presented in Section 4.2, Air Quality, and Section 4.6, Greenhouse Gas Emissions, conservatively include 200 haul truck roundtrips during the Site Preparation phase to cover unanticipated and incidental export and import haul, such as import soil for raised garden beds or for the removal of waste materials.

The Project would use water from wells that are on site during construction activities; there would be no imported water for construction use as stated on page 4.14-17 of Section 4.14, Utilities and Service Systems. However, the CalEEMod input specifies watering for construction dust control and assumes the use of water trucks in the emissions calculations. Additionally, the modeling assumes ten truck roundtrips per day during the Building Construction phase to cover the delivery of materials, and export of construction waste. Therefore, the analysis set forth in the Draft EIR includes a conservative analysis of truck trips and no additional analysis is required.

Weingart-37

The commenter's quoted text is a statement that describes the rationale for the South Coast Air Quality Management District's (SCAQMD's) construction emission amortization methodology.

Section 4.6, Greenhouse Gas Emissions, utilizes the methodology set forth by the SCAQMD, which is also used by the AVAQMD. In essence, this statement means that construction equipment greenhouse gas (GHG) emission factors only change slowly with time, and therefore, there are limited ways to decrease emissions from construction equipment. The inventory of construction equipment to be used during each phase of this Project is included in Appendix B of the Draft EIR, as stated in Section 4.6, Greenhouse Gas Emissions. The construction equipment type, amount, usage hours per day, horsepower, and load factor are also included in Appendix B of the Draft EIR.

Weingart-38

The reference in Section 4.6, Greenhouse Gas Emissions, to construction activities beginning in November 2016 has been revised in Section 3.0, Clarifications to the Draft EIR to reflect the anticipated December 2016 start date. The analysis throughout the Draft EIR is not materially affected by the start date of construction activities. The analysis of GHG emissions is not based on start/end dates because emissions are analyzed on an annual basis. Section 4.6.6, Impact Analysis, states the following:

It should be noted that the Design-Build contractor may request an expedited schedule to work on Saturdays and/or to increase the intensity of the daily construction operations through the use of more equipment/workers on-site than anticipated in the Project's proposed schedule (see Section 3.0, Project Description). This request would be considered for the purpose of reducing the duration of the Project construction period. The emissions modeling assumes a 5-day work week. If some or all construction would occur on a 6-day per week schedule and/or the schedule would be shortened by using more equipment, annual greenhouse gas emissions may increase for the years affected. Because the total Project effort would not change, there would be offsetting decreases later in the Project and the total greenhouse gas emissions would be the same, or approximately the same as shown in Table 4.6-2. The amortized Project emissions would not change.

No additional analysis is required.

Weingart-39

As stated in Section 4.6, Greenhouse Gas Emissions, "as originally proposed by the SCAQMD, it has become current practice (in most air districts) that construction emissions are amortized over a project lifetime (typically 30 years) so that GHG-reduction measures will address construction GHG emissions as part of the operational GHG reduction strategies (SCAQMD 2008; SMAQMD 2009)". The AVAQMD uses the SCAQMD construction emission amortization methodology. The AVAQMD threshold for significant GHG emissions of 100,000 tons (90,718 metric tons) is stated on page 4.6-12 of the Draft EIR. There are no separate thresholds for construction and operations. However, for comparison, the estimated emissions per year of construction are shown in Table 4.6-2 in Section 4.6, Greenhouse Gas Emissions. As shown, the Project's maximum annual construction GHG emissions in 2017 of 306 metric tons of carbon dioxide equivalent (MTCO_{2e}) are substantially less than the AVAQMD's 90,718 MTCO_{2e} threshold.

As shown in Table 4.6-4 of Section 4.6, Greenhouse Gas Emissions, with consideration of amortized construction emissions, the total annual estimated GHG emissions for the Project are 5,614 MTCO_{2e}/yr. This value is considerably less than the AVAQMD threshold of

90,718 MTCO₂e/yr. Therefore, the Project would result in less than significant GHG emissions and no mitigation is required.

Weingart-40

The total Project-related GHG emissions from construction activities are estimated based on the total work effort, whether that effort occurs during five-day or six-day work weeks. The “offsetting decreases” are not GHG reductions; they indicate that more work is done earlier in the schedule. The total work effort remains unchanged. Section 4.6.6, Impact Analysis, states the following:

It should be noted that the Design-Build contractor may request an expedited schedule to work on Saturdays and/or to increase the intensity of the daily construction operations through the use of more equipment/workers on-site than anticipated in the Project's proposed schedule (see Section 3.0, Project Description). This request would be considered for the purpose of reducing the duration of the Project construction period. The emissions modeling assumes a 5-day work week. If some or all construction would occur on a 6-day per week schedule and/or the schedule would be shortened by using more equipment, annual greenhouse gas emissions may increase for the years affected. Because the total Project effort would not change, there would be offsetting decreases later in the Project and the total greenhouse gas emissions would be the same, or approximately the same as shown in Table 4.6-2. The amortized Project emissions would not change.

No additional analysis is required.

Weingart-41

The commenter's assertion that emissions from service/delivery trucks are not included in the Draft EIR analysis is incorrect. As stated in the footnotes to Table 6-1, Project Trip Generation, of the Traffic Impact Study (Appendix H of the EIR), “The site specific daily trip generation was derived based on detailed site programming information (employee numbers and shifts, miscellaneous delivery trucks, and inmate transport vehicles) as provided by County staff” (LLG 2015). Employee trips were estimated at 922 daily trips (461 round-trips); inmate transport trips were estimated at 16 daily trips (8 round-trips); and other miscellaneous trips were estimated at 100 daily trips (50 round-trips). The calculation of mobile source input for trip generation was taken from the Project's Traffic Impact Study and used as an input into CalEEMod, which is a computer program that is used to calculate anticipated emissions associated with land development projects in California. Therefore, the Project's trip generation, which includes 100 daily trips for service vehicles, was included as an input into the CalEEMod air quality and greenhouse gas analysis. No additional analysis is required.

Weingart-42

The operational annual emissions for each source area (i.e., area, energy, mobile, off-road, solid waste, water) were calculated using CalEEMod Version 2013.2.2. Estimates of energy use and solid waste were provided by the Los Angeles County Department of Public Works engineering staff. Additional details relative to the CalEEMod calculations may be found in Section 4.2, Air Quality, and in Appendix B of the Draft EIR. Operational emissions from the MLDC when it was occupied by the Immigration and Customs Enforcement (ICE) were not analyzed because the program ended in 2012 and was not in operation at the time of the issuance of the Project's Notice of Preparation (NOP). The NOP was issued in September of 2014 which, according to Section

15125 of the State CEQA Guidelines, establishes the existing physical conditions on the Project site from both a local and regional perspective and constitutes the baseline conditions by which a lead agency determines whether an impact is significant. As such, the GHG emissions from the previous uses at the Project site were not determined to be applicable for the Draft EIR.

Weingart-43

This comment offers no basis to support the statement that the analysis presented in Section 4.6, Greenhouse Gas Emissions, is inaccurate. As demonstrated through the responses to Weingart-36 through Weingart-42, the Draft EIR includes a conservative analysis of GHG emissions using the widely accepted CalEEMod methodology. We hope that a review of these responses to your comments and the information in the Draft EIR referenced will help to address your concerns. No additional analysis is required.

Weingart-44

As stated in RR GHG-4 in Section 4.6, Greenhouse Gas Emissions, "The Project will include an Employee Commute Reduction Plan (ECRP), commonly known as the Rideshare Plan, in accordance with Los Angeles County Code Chapter 5.9, Vehicle Trip Reduction. The ECRP will specify the measures to be implemented at MLWDC to achieve the target average vehicle ridership performance goal for employee vehicles subject to the Ordinance". Because reductions in GHG emissions from RR GHG-4 cannot be reasonably quantified, they were not taken into account in the CalEEMod emission calculations.

Although the ECRP is incorporated as a mandatory component of the Project, no GHG emissions reductions were applied to the CalEEMod assumptions for PDFs GHG-1 through PDF GHG-4 or for RRs GHG-1 through GHG-5. Therefore, the elimination of the ECRP, or the inclusion of it, would not result in any changes to the calculations or conclusions presented in Section 4.6, Greenhouse Gas Emissions. The requirement for the ECRP is not a mitigation measure that is necessary to reduce a significant impact, but rather a County policy designed to encourage alternatives to single-occupancy vehicle trips.

Weingart-45

As stated in PDF GHG-2 in Section 4.6, Greenhouse Gas Emissions, the Project will provide a combined minimum of 34 video-visiting stations on site, along with video interview rooms in transitional housing buildings. This is anticipated to reduce VMT associated with vehicle travel to the MLWDC by inmate visitors by providing more options and opportunities for visitation when compared to the two video-visiting stations currently located within CRDF. However, deductions of VMT and GHG emissions associated with the video-visiting stations were not quantified in the GHG analyses or in the Traffic Impact Study for the Project.

Because reductions in GHG emissions from PDF GHG-2 cannot be reasonably quantified, they were not taken into account in the CalEEMod emission calculations. Although PDF GHG-2 is incorporated as a mandatory component of the Project, no GHG emissions reductions were applied to the CalEEMod assumptions for PDFs GHG-1 through PDF GHG-4 or for RRs GHG-1 through GHG-5. Therefore, the elimination of the video visiting stations as set forth in PDF GHG-3, or the inclusion of them, would not result in any changes to the calculations or conclusions presented in Section 4.6, Greenhouse Gas Emissions.

Weingart-46

As stated in PDF GHG-3 in Section 4.6, Greenhouse Gas Emissions, the Project will post Antelope Valley Transit Authority (AVTA) bus and Metrolink schedules, as well as the locations of the nearest Park-and-Ride lots, in areas visible to visitors and in the Staff Services building to encourage the use of public transportation by staff and visitors. AVTA bus and Metrolink schedule information will be updated not a minimum of every six months to ensure that they are accurate.

Because reductions in GHG emissions from PDF GHG-3 cannot be reasonably quantified, they were not taken into account in the CalEEMod emission calculations. Although PDF GHG-3 is incorporated as a mandatory component of the Project, no GHG emissions reductions were applied to the CalEEMod assumptions for PDFs GHG-1 through PDF GHG-4 or for RRs GHG-1 through GHG-5. Therefore, the elimination of the requirements set forth in PDF GHG-3, or the inclusion of them, would not result in any changes to the calculations or conclusions presented in Section 4.6, Greenhouse Gas Emissions.

Weingart-47

As stated in PDF GHG-4 in Section 4.6, Greenhouse Gas Emissions, the Project will incorporate (1) a secure storage area for staff to store bicycles into the Project design plans that allow for the individual locking of bicycles and protection from sun and inclement weather and (2) bicycle rack(s) adjacent to the Visitor Parking Lot that allows for the individual locking of bicycles.

Because reductions in GHG emissions from PDF GHG-4 cannot be reasonably quantified, they were not taken into account in the CalEEMod emission calculations. Although PDF GHG-4 is incorporated as a mandatory component of the Project, no GHG emissions reductions were applied to the CalEEMod assumptions for PDFs GHG-1 through PDF GHG-4 or for RRs GHG-1 through GHG-5. Therefore, the elimination of the requirements for bicycle facilities, or the inclusion of them, would not result in any changes to the calculations or conclusions presented in Section 4.6, Greenhouse Gas Emissions.

Weingart-48

As stated in the responses to Weingart-44 through Weingart-47, the analysis presented in Section 4.6, Greenhouse Gas Emissions, did not take any deductions from the total annual GHG emissions that would result from implementation of PDF GHG-1 through PDF GHG-4, nor were deductions taken for RRs GHG-1 through GHG-5 because the reductions in VMT and mobile GHG emissions from the implementation of these RRs cannot be reasonably quantified. Therefore, the GHG emission estimates presented in the Draft EIR are conservatively high, and the impacts are less than significant.

Weingart-49

This comment, in part, raises issues that extend beyond the scope of the CEQA requirements; nonetheless, the Board of Supervisors will receive and be able to consider it and all other comments raised before taking any action on the proposed Project. The scope of CEQA is generally limited to the evaluation of a proposed project's potential impact on the environment, and does not extend to the impact of the existing environment on a proposed project or on its users or residents. The applicable definition of the environment analyzed for CEQA purposes in an environmental impact report is the physical conditions in the area that are affected by the proposed project (e.g., land, air, and water). The proposed MLWDC Project's Draft EIR discloses and addresses the potential direct, indirect, and cumulative impacts of the proposed Project on

the physical environment, in accordance with the State CEQA Guidelines for all environmental issue areas. For the topics mentioned in the comment, refer specifically to Section 4.2, Air Quality, 4.6, Greenhouse Gas Emissions, and 4.14, Utilities and Service Systems, of the Draft EIR.

Weingart-50

In 2015, the underground storage tanks (USTs) were reported to be in compliance and passed all leak detection requirements (CERS 2016, AW Associates 2016). As such, the use or removal of these tanks will not lead to leaks that may potentially contaminate the underlying soils and groundwater and no mitigation is required.

Weingart-51

The information on the removal of the six USTs was taken from the Phase I Environmental Site Assessment (ESA), which states that the information on the leaking underground tanks and clean up information was based on the list of Leaking Underground Storage Tanks (LUST) Sites (see Converse 2014c, pages 24 and 25) and the County Department of Public Works records (see Converse 2014c, pages 33 and 34). The County Department of Public Works oversaw the remediation and issued the "no further action" letter. The Phase I ESA is provided in Appendix E-1 of the Draft EIR.

Weingart-52

The sentence on page 4.7-8 of the Draft EIR reads: "No leaks were observed, except for minor staining on the carpet and hydraulic oil on the concrete floors beneath the emergency generator in the central plant (i.e., steam plant)". This information on minor staining was taken from the Phase I ESA, which is provided in Appendix E-1 of the Draft EIR. The minor staining was observed near unlabeled five-gallon containers with a minor amount of an oil-tar-like substance in the Sergeant Senior Building (see Converse 2014c, pages 38 and 47). The hydraulic oil was observed on the floor beneath the hole punch machine in the George Barracks and the emergency generator in the central plant (see Converse 2014c, pages 5, 48, 51 and 52). Soil testing near the hole punch machine location was performed in January 2016, which indicated no significant contamination findings (Converse 2016b). No further assessment is required.

Weingart-53

The Asbestos and Lead Based Paint Survey Report (Appendix E-2 of the Draft EIR) states that Buildings 27, 28 and 29 are temporary modular buildings that were visually inventoried but not sampled. These are pre-fabricated modular units (i.e., mobile homes) that appeared to be of newer construction (Converse 2014a). Building 27 will remain in place but Buildings 28, 29 and 40 may be disassembled and removed from the site but not demolished. However, this is not certain at this time prior to the Project's final design.

As demonstrated in Section 4.7, Hazards and Hazardous Materials, of the Draft EIR, MM HAZ-1 and MM HAZ-2 requires that, in the event that building materials are encountered during construction activities that are suspected of being asbestos-containing materials (ACMs) or lead-based paint (LBP), these materials shall be assumed to contain asbestos or lead and shall be handled, removed, transported and/or disposed in accordance with applicable regulations, until such time that they can be sampled and evaluated. As provided in Appendix D of this Final EIR, subsequent testing of building material samples from Buildings 27, 28, 29, 32 and 40 indicate the presence of asbestos-containing materials in Buildings 28, 29 and 40; and lead-based paint was found in the sinks in Building 29. If Buildings 27, 28, 29, 32 and 40 are removed, without being

demolished, asbestos materials need not be abated. If these buildings are demolished, the asbestos materials would have to be abated and disposed in accordance with RR HAZ-4 and MM HAZ-1. If the sinks in Building 29 are removed intact, they can be disposed as construction debris; otherwise, they would have to be disposed in accordance with RR HAZ-4 and MM HAZ-2 (Converse 2016a).

Weingart-54

As stated on page 4.7-19 of the Draft EIR, the existing fueling station is located outside the Project site boundary, but may be used by the Project. This fueling station has two USTs that previously failed leak detection tests. As shown in the California Environmental Reporting System (CERS) database and the Monitoring System Certification by AW Associates in Appendix E to this Final EIR, the tank permits were updated in 2015 and have passed subsequent leak detection tests and are now in compliance. Soil testing also indicated there is no soil contamination near the USTs (Converse 2016b). MM HAZ-3 requires the testing and repair, as necessary, of the USTs prior to the use of the existing fueling station by the Project.

Weingart-55

The WSA for the Project, as summarized in Section 4.14, Utilities and Service Systems, discusses the adjudication of groundwater rights in the Antelope Valley and that this adjudication will provide a final allocation of groundwater rights for the long-term groundwater management of the Antelope Valley Groundwater Basin. A finite volume of groundwater that the LACWWD 40 can pump without paying penalties or replenishment fees would be assigned as part of the adjudication, and the adjudication judgment provides LACWWD 40 with the rights to pump approximately 22,500 afy to 27,000 afy of groundwater depending on factors including the amount of the Federal reserved right which is not used by the United States and the supplemental yield attributable to return flows from imported water purchased by LACWWD 40 and delivered to its customers. The Integrated Regional Urban Water Management Plan (IRUWMP) for the Antelope Valley projects that groundwater allocation for LACWWD 40 would be based on historical pumping amounts. The LACWWD 40 is projected to have an average annual pumping rate of 23,200 acre-feet per year (afy) from 2015 to 2035 (LACWWD 40 2011). These projections are subject to change after the adjudication has been finalized as the judgment is currently being appealed; however, it is estimated the 23,200 afy allocation is a conservative value and the final adjudicated amount could be higher, as indicated above.

As contained in the WSA, no change in the available groundwater supplies for the LACWWD 40 is projected from 2015 to 2035 (Psomas 2015). Thus, if the final adjudication judgment results in LACWWD 40 having the right to pump a greater amount, it will have the option to pump up to its allocation or pump below its allocation. This will allow the LACWWD 40 to readily provide water supply to the Project and its other customers, as well as reduce its use of imported water sources. If the final adjudication judgment results in LACWWD 40 receiving the right to pump a lower volume of groundwater, LACWWD 40 would have the option to use a greater amount of imported water or to more heavily rely on its programs for water banking; purchase of new imported supplies; water transfers; water conservation; and expansion of recycled water systems.

As indicated on page 4.14-29 of the Draft EIR, the LACWWD 40 will serve the Project with imported water purchased through the Antelope Valley East Kern Agency (AVEK). MM UTL-1 requires that the County sign the New Water Supply Entitlement Acquisition Agreement with the LACWWD 40 and pay a deposit of \$10,000 per acre-foot of annual water demand from the Project for the acquisition of additional water supplies from AVEK to serve the Project. The adjudication judgment prevents overdraft of the Antelope Valley Groundwater Basin by setting the safe yield

of the basin to eliminate the long-term overdraft condition, and creates a Watermaster to enforce the terms of the judgment.

The well flow, well yield, and water quantity of the LACWWD 40 varies by well and period but the LACWWD 40's Integrated Regional Urban Water Management Plan for the Antelope Valley shows historic (2005-2009)⁵ groundwater pumping totals ranging from 12,371 afy in 2006 to 24,901 afy in 2008. The Antelope Valley Integrated Regional Water Management Plan indicates that AVEK operates a groundwater basin banking project (Water Supply Stabilization Project No. 2 [WSSP-2]) that recharges the groundwater basin with imported water during wet years when supplies exceed demands and extracts up to 90 percent of the banked water in drought years when supplies are low. LACWWD 40 participates in the WSSP-2. There is no way to determine the exact source (i.e. well water or imported water, or the particular well yield) of the water that would serve the Project site via the proposed new water pipeline extension from the on-site water lines to the existing 12-inch LACWWD 40-owned distribution pipeline within West Avenue I because LACWWD 40 waters are comingled to meet water quality and distribution requirements.

Weingart-56

Page 4.14-11 of Section 4.14, Utilities and Service Systems, states that the LACWWD 40 currently has a 36-inch-diameter, cement-lined, coated steel transmission water main located 25 feet from the property line along 60th Street West and a 12-inch-diameter pipe located within West Avenue I. The availability of water or the current drought conditions have no direct effects on this water infrastructure.

The LACWWD 40 has sufficient infrastructure to use State Water Project (SWP) water from AVEK to meet the water demands in its service area even during peak summer demand periods. The LACWWD 40 has also planned for potential water shortages through various demand management measures that would reduce water use and consumption. The WSA for the Project addresses drought conditions and states that future water supplies of the LACWWD 40 will be ensured through continued implementation programs such as water banking, purchase of new imported supplies, water transfers, water conservation, and expansion of recycled water systems.

As stated on page 4.14-8, of Section 4.14, Utilities and Service Systems, the adjudication process for the Antelope Valley Groundwater Basin acknowledges that the basin is in a state of overdraft. Allocation of groundwater rights would limit groundwater extraction in the basin to its safe yield and avoid continued overdraft conditions. As demonstrated on page 4.14-23, the LACWWD 40 has implemented a New Supply Acquisition program to provide funding for additional imported water supplies. Thus, while the Project would require water from the LACWWD 40 to operate, the LACWWD 40 will serve the Project with imported water supplies obtained through AVEK. MM UTL-1 requires that the County sign the New Water Supply Entitlement Acquisition Agreement with the LACWWD 40 and pay a deposit of \$10,000 per acre-foot of annual water demand from the Project for the acquisition of additional water supplies from AVEK to serve the Project. The WSA concludes that there is a sufficient and reliable water supply for LACWWD 40, now and into the future, including a sufficient water supply for the Project. These supplies are also sufficient to provide for overall growth in the LACWWD 40 service area at the rate projected in the 2010 IRUWMP (Psomas 2015).

⁵ The production statistics used are published data and more current data has not yet been published.

Weingart-57

The historic water use numbers in Table 4.14-1 in Section 4.14, Utilities and Service Systems, are provided to show the amount of water pumped by on-site wells when the MLDC was in use as an Immigration and Customs Enforcement (ICE) facility until 2012. Since then, the Project site has been largely vacant and the water use has been limited. Water use data from the MLDC when it was occupied by ICE were not incorporated into the WSA analysis because the program was not in operation at the time of the issuance of the Project's NOP. The NOP was issued in September of 2014 which, according to Section 15125 of the State CEQA Guidelines, establishes the existing physical conditions on the Project site from both a local and regional perspective and constitutes the baseline conditions by which a lead agency determines whether an impact is significant. As such, the use of water from the historic uses at the Project site are not relevant to the future proposed Project operations, and no additional analysis is required.

Weingart-58

The Storm Water Pollution Prevention Plan (SWPPP) must be prepared by a Qualified SWPPP Developer (QSD) and implemented by a Qualified SWPPP Practitioner (QSP) who will be responsible for monitoring that selected Best Management Practices (BMPs) are in place and in working condition at the construction site. The SWPPP must include BMPs to be implemented during construction, including a Construction Site Monitoring Program (CSMP). The primary objective of the SWPPP is to ensure that the responsible party properly constructs, implements, and maintains BMPs to reduce or eliminate pollutants in storm water discharges and authorized non-storm water discharges from the construction site. The SWPPP must also outline the monitoring and sampling program to verify compliance with discharge Numeric Action Levels (NALs) set by the Construction General Permit.

Public agency monitoring of compliance with the SWPPP is provided by State Water Resources Control Board (SWRCB) inspectors who visit construction sites and verify implementation of the BMPs and compliance with other requirements of the SWPPP. In addition, the Los Angeles County Department of Public Works (LACDPW) would also be performing site inspections to monitor compliance with the approved construction plans. Any person may also report a storm water pollution problem to the SWRCB or the local agency.

As stated in Section 4.8, Hydrology and Water Quality, PDF HYD-1 requires that the on-site storm drainage system would comply with storm water quality and quality control requirements under the County's Standard Urban Stormwater Management Plan (SUSMP), Low Impact Development (LID) standards, Hydrology Manual, Best Management Practices Handbook, and Green Building Standards Code. These requirements, along with RR HYD-2, address potential pollutant runoff from long-term operations of the Project and include a drainage concept and storm water quality plan to reduce peak storm water runoff discharge rates; to conserve natural areas; to minimize storm water pollutants of concern; to protect slopes and channels; to provide storm drain system stenciling and signage; to properly design outdoor material storage areas and trash storage areas; and to provide proof of ongoing maintenance of structural or treatment-control BMPs that would prevent pollutants from entering the runoff.

Weingart-59

The Project's permanent storm water treatment-control BMPs would be included in the final engineering plans for the Project; would be subject to LACDPW review and approval as part of the plan check process; and would be inspected during construction. Code enforcement actions by the County would monitor proper and continued use of these BMPs.

Weingart-60

Please refer to the response for Weingart-6 regarding the costs of the proposed Project.

Weingart-61

The MLDC property currently and historically obtains its water supply from an on-site system of groundwater wells, pumps, and tanks, as described in Section 4.14, Utilities and Service Systems. As part of the proposed Project, a new off-site water pipeline extension will be constructed from the on-site water lines to the existing 12-inch LACWWD 40-owned distribution pipeline in West Avenue I. Existing pipeline connections to County-owned groundwater wells and reservoirs located adjacent to 60th Street West will be disconnected, and the proposed MLWDC Project site's potable water supply would be provided by LACWWD 40 rather than from the County-owned groundwater wells.

The LACWWD 40 obtains water primarily from local groundwater resources and imported water from the State Water Project through the AVEK. In the past few years, recycled water has been introduced to the LACWWD 40 service area by the City of Lancaster, and the County of Los Angeles Sanitation District (LACSD) No. 14 continues to serve recycled water directly to Apollo Park. However, recycled water is not yet available to the Project site.

Therefore, it cannot be said that the Project will not use groundwater because the Project will be served by LACWWD 40, which sources its water supply from both groundwater and SWP water. However, the MLWDC property will no longer be connected to the County's system of wells, pumps, and tanks and will not be directly provided water via this groundwater pumping and distribution system.

The environmental impacts associated with the acquisition and development of additional imported water supplies is the responsibility of AVEK. As stated in the WSA prepared for the Project (see Appendix B of the WSA – MOU Between AVEK and Waterworks District No. 40), included as Appendix G-2 of the Draft EIR (Psomas 2015):

The Waterworks District and AVEK will enter into an agreement by which the Waterworks District may require the applicant to deposit with the Waterworks District the amount of money estimated by AVEK to be necessary to fund AVEK's cost of purchasing the additional imported water supplies required by the Waterworks District as a condition of providing a service commitment to the applicant's development. Upon receipt of that deposit by the applicant, the Waterworks District will then deposit that amount with AVEK. The deposit shall cover the estimated purchase price of the additional water supplies, AVEK's cost of completing the environmental assessment under the California Environmental Quality Act and the National Environmental Policy Act (if required), and AVEK's transactional costs including document preparation and review by AVEK staff and legal counsel ("Costs").

MM UTL-1 requires that the County sign the New Water Supply Entitlement Acquisition Agreement with the LACWWD 40 and pay a deposit of \$10,000 per acre-foot of annual water demand from the Project for the acquisition of additional water supplies from AVEK to serve the Project. Therefore, the impacts of importing water on traffic and air quality is determined through the appropriate CEQA/National Environmental Policy Act (NEPA) documentation prepared by the AVEK to support the procurement of additional imported water supplies.

Weingart-62

As stated in Section 4.8, Hydrology and Water Quality, and Section 4.14, Utilities and Service Systems, existing water lines connected to the on-site wells and reservoirs would provide the needed water for construction activities, replacing existing water use from minor maintenance and security activities. The proposed connection to the LACWWD 40 12-inch potable water line within West Avenue I would not need to be connected in order to conduct construction activities or suppress potential dust generated by earth-moving activities because the existing and operational County-owned groundwater pumping and storage system infrastructure would be available at the Project site.

Weingart-63

As stated on page 4.11-5 of Section 4.11, Population and Housing, the growth projections in Table 4.11-6 are projections that were prepared by the Southern California Association of Governments (SCAG) for individual cities and counties as part of its regional planning efforts for the development of the Regional Comprehensive Plan (RCP), Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), and the Regional Housing Needs Assessment (RHNA). These projections were adopted by the SCAG Board in 2012.

The Integrated Regional Urban Water Management Plan (IRUWMP) for the Antelope Valley also include growth projections for the service areas of the LACWWD 40 and the Quartz Hill Water District service area. As stated in Table 1-3 of the IRUWMP, these growth projections were based on land use maps and General Plans for the cities of Palmdale and Lancaster (LACWWD 40 2011).

Because the boundaries of the SCAG projections follow city boundaries, which differ from the service area boundaries of the water districts, the SCAG and IRUWMP projections are not comparable to the other. Still, the SCAG projections are also used in the analysis of cumulative impacts in Section 4.11.5 of the Draft EIR. The projections in the Integrated Regional Urban Water Management Plan for the Antelope Valley are used in the LACWWD 40's plans to meet future water demands in their service areas, as demonstrated in Section 4.14.7 of the Draft EIR.

Weingart-64

The Project would be staffed by Sheriff's Department security/sworn staff, Sheriff's Department civilian staff, teachers, counselors, maintenance personnel, physicians, registered nurses, registered nurse practitioners, and other County employees. There is no specific breakdown of the skills and experience of unemployed residents in the City of Lancaster. Thus, a match of the future jobs at the MLWDC and the unemployed residents cannot be readily made. However, this does not preclude Lancaster residents from taking the training or learning the skills needed to work at the Project.

Weingart-65

According to the California Department of Forestry and Fire Protection (CAL FIRE), the Very High Fire Hazard Severity zone is located at the base of the Sierra Pelona Mountains to the south, which is outside the city boundaries of Lancaster. The 4.5-mile distance between this zone and the site includes relatively flat areas with urban development that are not considered to be in a Very High Fire Hazard Severity Zone area. Thus, no wildfire hazards are present on or near the site.

Weingart-66

This comment, in part, raises issues that extend beyond the scope of the CEQA requirements; nonetheless, the Board of Supervisors will receive and be able to consider it and all other comments raised before taking any action on the proposed Project. The scope of CEQA is generally limited to the evaluation of a proposed project's potential impact on the environment, and does not extend to the impact of the existing environment on a proposed project, or on its users or residents. The applicable definition of the environment analyzed for CEQA purposes in an environmental impact report is the physical conditions in the area that are affected by the proposed project (e.g., land, air, and water). The proposed MLWDC Project's Draft EIR discloses and addresses the potential direct, indirect, and cumulative impacts of the proposed Project on the physical environment, in accordance with the State CEQA Guidelines for all environmental issue areas.

Outdoor recreation, both active (e.g., use of sports courts, running track) and passive (e.g., sitting in courtyards or on turf grass areas), will occur on the Project site. The outdoor recreation opportunities and amenities are one of the benefits of the proposed MLWDC Project when compared to existing facilities at the CRDF. There are no known reasons to believe that risks of infection from Valley Fever from participating in outdoor recreational activities at the MLWDC site would be any different from the risks of participating in outdoor activities elsewhere in the Lancaster portion of the Antelope Valley.

Weingart-67

As shown in Exhibit 3-1 in Section 3.0, Project Description, the volleyball and basketball courts are outdoor facilities. The Project does not include an indoor gymnasium.

Weingart-68

Section 4.13, Transportation and Traffic, summarizes the findings of the Traffic Impact Study for the Project. The Traffic Impact Study is provided in Appendix H of the Draft EIR. As stated on pages 4.13-2 to 4.13-3 of Section 4.13, the estimate of the Project's daily trip generation was based on specific data provided by the Los Angeles County Sheriff's Department and includes employee shift times, number of employees per shift, frequency of inmate transport buses, and miscellaneous service/delivery vehicles, among other factors. The miscellaneous vehicle trips due to service/delivery, medical delivery, and court personnel transport were estimated at no more than 25 vehicles per weekday and at ½ of this total for weekend daily trips.

The discussion of video visitation on page 4.13-20 is provided in the context of estimating the total VMT as associated with the location of the MLWDC away from the highly urbanized area of Los Angeles County but is not considered in the trip generation estimates in the Traffic Impact Study. Rather, the number of trips for inmate visitation was estimated at 39 percent of the available appointment slots or about 28,543 visits per year (the same rate as existing at the CRDF). Forecasts assume 250 inbound visitor trips and 250 outbound visitor trips per day during the 114 weekend days and holidays per year. This visitation reflects the number of visitors that is currently occurring at a detention facility that is located in the highly urbanized area of Los Angeles County. With this estimate, it is expected that video visitation would occur in addition to the in-person visits that involve personal vehicle trips to the MLWDC. Therefore, contrary to the commenter's assertion, the Project does not assume that video visitation is a mitigation for increased traffic.

Weingart-69

As discussed on page 4.13-23 and 4.13-24 of the Draft EIR, the existing transit services in the area will adequately accommodate the increase of Project-generated transit trips. The County does not operate the buses and trains that serve the Antelope Valley area. The Southern California Regional Rail Authority (SCRRA), which operates the Metrolink commuter rail system, and the AVTA, which operates buses, provide transit services to meet demand and generally review service routes and schedules as part of their long-range planning efforts. Should demand increase over existing levels, it will be up to the Metrolink and AVTA agencies to revise or expand their services to meet demand. There is a bus stop at the former High Desert Regional Health Center that is located south of the Project site.

Weingart-70

The City of Lancaster has jurisdiction over the City roadways and the implementation of bicycle lanes within the City. As stated on page 4.13-24 of Section 4.13, Transportation and Traffic, while the City of Lancaster has no existing or proposed bikeways on 60th Street West and West Avenue I along the site boundaries, roadway shoulders and sidewalks in the area may be used by bicyclists and pedestrians coming to or going from the Project site.

-----Original Message-----

From: Women of Color in the Global Women's Strike, Global Women's Strike/LA
[mailto:la@allwomenscount.net]

Sent: Monday, January 11, 2016 5:20 PM

To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental
<environmental@ceo.lacounty.gov>; lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov;
MarkRidley-Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov;
FifthDistrict@lacbos.org

Subject: Attn: Mira Loma Women's Jail Environmental Impact Report

Dear LA County Chief Exec Office and Board of Supervisors,

Public comment on the Draft Environmental Impact Report (EIR) for the proposed new Mira Loma Jail

From: Women of Color in the Global Women's Strike and Global Women's Strike/LA

As multi-racial women's organizations with a long history of working for resources for mothers and children and against poverty in LA County, we submit that the proposed new LA County jail in Lancaster will be severely detrimental to the health and well being of LA County residents beginning with women and children, as well as destructive to the local environment. The EIR fails to address a number of negative impacts.

WOC-1

The proposed new jail location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there is a high probability of soil and groundwater contamination. This would put the health of women prisoners at the proposed jail at risk. Some undoubtedly would be pregnant or may become pregnant, so the County would be endangering also the health of their unborn children with the real possibility of lifelong impacts and should and would be held accountable for this.

WOC-2

There is as well increased danger of catching Valley Fever in this area, which was essentially ignored in the EIR. If the jail proposal moves forward, women detained here will be put at risk for this serious disease, particularly but not only those with compromised immune systems. With healthcare in LA's jails already desperately needing improvement, as acknowledged by the County last summer, a jail located here could prove deadly. The County would also be putting at risk the health of family members who visit including children and older women who are especially vulnerable, as well as County workers employed at the facility. During construction, local residents and construction workers would also be at increased health risks due to displacement of soil, including the risk of chemical poisoning from hazardous waste contaminants and of catching Valley Fever as the fungus which causes this potentially fatal disease is located in the soil and is spread by the wind.

WOC-3

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for those imprisoned who need to be taken to court etc, for their loved ones who visit, as well as for lawyers and service providers serving prisoners. This increased travel will be a severe burden on families. One of the 'primary objectives' of the project is to reduce recidivism. Maintaining strong family connections has been documented as a key factor in reducing recidivism. Yet the County building its jail way out in Lancaster undermines this stated primary objective. Furthermore, this proposed jail is for women, and it is well-documented that women are the primary caregivers, fighting for the well-

WOC-4

being of children and sick, disabled and elderly people – and this work continues when women are jailed. The majority of women in prison are mothers, while the new proposed Mira Loma correctional facility is 75 miles or more away from the neighborhoods in which most of their children live. How are children supposed to stay connected with their moms when visits are made more difficult and burdensome, which will likely make it impossible for many children to visit their moms? Making it more difficult for mothers to maintain contact with their children also increases the risk of mothers' parental rights being terminated, putting their children at risk of abuse in foster care or being adopted away from their extended families. Children must not be "collateral captives" in LA County plans.

WOC-4
cont.

Increasingly communities and even the President are looking to decrease the number of people who are incarcerated. Why isn't the County of Los Angeles focused on that rather than building a new jail? Women jailed in LA County, for as little as failing to pay parking tickets and other "crimes" of poverty, are disproportionately women of color and from low-income communities – it is unacceptable that their lives and those of their children and other loved ones are being treated as disposable. Rather than continuing down this road spending billions building new jails, we urge the County to use those precious resources to undercut the growing poverty of women and our children in LA County, to prioritize keeping families together, housed, nourished and healthy.

WOC-5

This proposed jail is unhealthy for LA County families, communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

WOC-6

--

Women of Color in the Global Women's Strike, Global Women's Strike/LA la@allwomenscount.net PO Box 86681 Los Angeles, California 90086 Women of Color in the Global Women's Strike, Global Women's Strike/LA

2.2.7 WOMEN OF COLOR IN THE GLOBAL WOMEN'S STRIKE (WOC)

January 11, 2016

WOC-1

This comment provides a general introduction to the comment letter and summarizes concerns related to environmental impacts of the Project. The Draft EIR for the proposed Project has been prepared in accordance with the California Environmental Quality Act (CEQA, *California Public Resources Code*, Sections 21000 et seq.) and the State CEQA Guidelines (14 *California Code of Regulations* [CCR]) and addresses the potential direct, indirect, and cumulative impacts of the Project on all applicable environmental issue areas. Section 5.0, Project Alternatives, was prepared in accordance with Sections 15126.6(a) through 15126.6(f) of the State CEQA Guidelines. As demonstrated throughout the Draft EIR, all potentially significant environmental impacts have been reduced to less than significant levels through the required mitigation measures, and no significant unavoidable environmental impacts would result from Project implementation. The Final EIR, including copies of all comments submitted, will be provided to the County of Los Angeles Board of Supervisors. Therefore, your concerns will be presented directly to the decision makers prior to consideration of Project approval.

WOC-2

The Draft EIR provides information directly addressing the commenter's concern regarding potential on-site hazardous waste health risks. The Project site is listed in government databases due to past hazardous material uses. However, the site was never operated as a site that accepted hazardous wastes for disposal. The Project site is on the list of Leaking Underground Storage Tanks (LUST) Sites, but the leaking underground storage tanks have been removed and the affected area was cleaned up. The County of Los Angeles Department of Public Works (LACDPW) oversaw the remediation and issued the "no further action" letter. The California Department of Toxic Substances Control (DTSC) lists the Polaris Flight Academy with a status of "inactive-needs evaluation". As part of the Phase II Environmental Site Assessment (ESA), soil borings collected in the area of the possible former location of the airstrip did not detect any contaminants that would require further action (Converse 2015). Thus, the listing of the site in government databases was based on previous uses that no longer pose hazards (Converse 2015).

As part of the environmental analysis for the Draft EIR, a Phase I ESA reviewed past and current uses and site conditions and identified Recognized Environmental Concerns (RECs) on the Project site and surrounding area. The Phase I ESA is provided in Appendix E-1 of the Draft EIR. Subsequent to the Phase I ESA, a Phase II ESA was prepared that included soil sampling to determine if soil contamination is present on the site. The Phase II ESA is provided in Appendix E-3 of the Draft EIR. In addition, an Asbestos and Lead Based Paint Survey Report was completed to identify the building components that contained asbestos and lead-based paint. The Asbestos and Lead Based Paint Survey Report is provided in Appendix E-2 of the Draft EIR. These reports are summarized in Section 4.7, Hazards and Hazardous Materials, of the Draft EIR.

The proposed Project must comply with existing regulatory requirements (RRs) for the proper handling of hazardous wastes, including transportation, treatment, storage, and disposal; repair and/or removal of underground storage tanks based on applicable standards; and practices that would protect the demolition and construction crews from asbestos and lead exposure. In addition, the Project must incorporate mitigation measures (MMs) for the handling of suspected

asbestos-containing materials and lead-based paint; an Operations and Maintenance Plan for regular inspection of any asbestos-containing materials; and testing and repair of underground storage tanks prior to use. Thus, existing hazardous materials and wastes would be removed from the Project site and future hazardous materials use would comply with applicable regulations to prevent hazards to future inmates. In summary, compliance with RRs and implementation of MMs set forth in the Draft EIR would prevent public health and safety hazards to inmates, employees, visitors, and other individuals at the Project site.

The Phase II ESA included 14 soil borings to depths of 8 feet below the ground surface (bgs). All soil samples from two and four feet bgs were analyzed for Total Petroleum Hydrocarbons (TPH), Volatile Organic Compounds (VOCs), and metals in accordance with U.S. Environmental Protection Agency (USEPA) Test Methods 8015M, 8260B, and 6010B/7471A, respectively (Converse 2015). As stated on page 4.7-18 of the Draft EIR, the soil analyses indicate that no VOCs are present in the soil samples. All reported metals, except arsenic, were found to be at levels below the California Human Health Screening Levels (CHHSLs) for both residential and commercial/industrial land. The arsenic levels are below the background level of the 12 milligrams per kilogram (mg/kg) level that the DTSC has determined to be naturally occurring background levels at school sites in California. The findings of the Phase II ESA indicated that there is no soil contamination on the site. With no contamination identified near-surface soils, it is unlikely that groundwater contamination would be present, considering that groundwater levels in the Antelope Valley Groundwater Basin in 2006 were estimated at 120 feet bgs at the Project site (RWMG 2013).

In summary, the Phase II ESA concludes that there is no soil or groundwater contamination on the Project site requiring remediation or other mitigation measures (Converse 2015). Existing hazardous materials in various buildings would be removed, transported, and disposed of in accordance with existing regulations. Mitigation Measures (MMs) HAZ-1 and HAZ-2 would be implemented for the handling of remaining building materials that may contain asbestos and lead-based paint; and MM HAZ-3 would be implemented for the reuse of other facilities near the Project site. Further, the use, storage, handling, transport and disposal of hazardous materials during operation of the Mira Loma Women's Detention Center (MLWDC) would be made in compliance with existing regulations. Accordingly, the Draft EIR concludes that the Project's impacts would be less than significant. Therefore, female inmates, including pregnant inmates and their unborn children, would not be exposed to health hazards or lifelong health effects from their stay at the MLWDC.

WOC-3

The Draft EIR specifically addresses the commenter's concern regarding the potential for exposure to Valley Fever, in both the construction and operational phases of the proposed Project. *Coccidioidomycosis*, also known as Valley Fever, and its potential impact on local residents, potential future inmates, and County staff is discussed in Section 4.2, Air Quality. A summary of hazards associated with the *Coccidioides* spores (i.e., the fungus that causes Valley Fever) that are found in native soil is provided, as well as summaries of trends related to Valley Fever in Los Angeles County, as inventoried and reported by the Los Angeles County Department of Public Health (LACDPH), which was consulted during the preparation of the Draft EIR.

The Draft EIR includes an analysis of exposure hazards due to fugitive dust that may result from construction-related earth-moving activities, and identifies several Project Design Features (PDFs) and Regulatory Requirements (RRs) to minimize any exposure risks. PDF AIR-1, which will be included in the Contractor's Specification and monitored through the Mitigation Monitoring and Reporting Program (MMRP), requires the distribution of materials on Valley Fever, or any

updated materials as applicable, to worksite supervisors and construction workers. PDF AIR-2 and RR AIR-1, which will be included in the Contractor's Specification and monitored through the MMRP, require compliance with Best Management Practices and AVAQMD Rule 403 for the prevention of fugitive dust and nuisance air contaminants. RR AIR-1 provides a listing of the most applicable AVAQMD Rules. Rule 403, Fugitive Dust, requires measures such as watering and control of track-out from the site, as well as submittal of a Dust Control Plan prior to the start of construction. Rule 403 requires control of fugitive dust and avoidance of nuisance, and Rule 402 prohibits the emission of quantities of air contaminants that could cause injury, detriment, nuisance, or annoyance to the public, or that endanger the comfort, repose, health or safety of the public. With implementation of RR AIR-1, on-site earth-moving activities would not result in fugitive dust that could affect adjacent off-site land uses.

As stated in RR AIR-2, the Project will be constructed in compliance with the Department of Health – Infection Control Policy Guidelines Procedure No. 918.01. Policy 918 is intended to prevent the spread of diseases that may be caused by construction-induced airborne pollution in susceptible individuals (patients, staff, and the public) at Department of Health Services (DHS) facilities. The protocols and requirements mandate the designation of an Infection Control Coordinator who must review and approve infection-control plans for new construction or renovation projects to ensure a safe environment. These infection-control plans must include infection-control measures to contain dust, debris, and other elements and protect the patients, employees, and visitors in this environment. The Infection Control Coordinator has independent authority to stop construction-related activities immediately when the public may be adversely affected by infection-control hazards generated during construction-related activities and when the infection-control precautions and/or engineering controls are inadequate to contain the hazard. The Draft EIR provides that exposure to Valley Fever during construction activities would be less than significant, and no mitigation is required.

Section 4.2, Air Quality, acknowledges that the future inmate population has the potential to be exposed to dust generated from soils in the Antelope Valley, which have the potential to contain *Coccidioides* spores, during operation of the proposed Project. As discussed in Section 3.0, Project Description, of the Draft EIR, according to the Sheriff's Department, Assembly Bill (AB) 109 female inmates are serving an average of 423 days in custody from date of sentencing to date of release, while non-AB 109 female inmates serve an average of 107 days in custody. Therefore, the length of time that inmates would be living at the MLWDC is temporary, and is not equivalent to a permanent living circumstance or the longer sentences in state prisons that house higher-security inmates.

The Draft EIR summarizes the LACDPH *2013 Annual Morbidity Report*, which presents the recent trends related to Valley Fever in Los Angeles County, including an increasing incidence rate for coccidioidomycosis in the last ten years. However, the overall incidence rate in the Antelope Valley has not warranted changes to date in the County's protocol for disease prevention, notwithstanding the fact that the County health and public health officials are well educated on the condition; are familiar with its incidence in the County and elsewhere in the state; and are involved in research and education on the subject of Valley Fever.

The LACDPH has not identified the previous U.S. Immigration and Customs Enforcement (ICE) detainee population at the MLDC, the future inmate population at MLWDC, or earlier occupants at the High Desert Health System (HDHS) Multi-Ambulatory Care Center (MACC) (the adjacent hospital facility, which has relocated in Lancaster) as requiring the implementation of health screening protocols or other measures to address potential Valley Fever exposure.

Also, as demonstrated in Section 4.2, Air Quality, the California Department of Corrections and Rehabilitation (CDCR) has not identified the Lancaster area as being a geographic location that requires screening or interventions for the State prison population with regard to exposure to Valley Fever (CDCR 2013).

The operation of the MLWDC will follow standard Sheriff's Department procedures for medical care and prevention with regard to health care for inmates in general, and Valley Fever specifically, and the Sheriff's Department will continue to coordinate with the LACDPH (Masis 2015). The LACDPH is the designated County agency with the mandate to protect health, prevent disease, and promote the health and well-being of all persons in Los Angeles County. As such, any future changes in LACDPH policies that may be made regarding Valley Fever for inmate populations will be implemented, as applicable, throughout the County jail system.

Because the future inmate population's exposure to disturbed soils would be limited to gardening activities, PDF AIR-3 states that the Project will import gardening soils from outside the Antelope Valley, which would be used in raised planting beds to remove gardening in native soils as a potential source of exposure to *Coccidioides* spores. Further, outdoor recreational areas and other non-paved areas on the Project site would be covered with landscaping, turf grass, gravel, or landscaping/wood chip ground cover that would minimize the opportunity for soils to become airborne.

The Antelope Valley has not been identified by the LACDPH, the Antelope Valley Air Quality Management District (AVAQMD), or any other governmental health agency as a region that should be avoided by the elderly, women, children, health-compromised individuals, or by any specific ethnic groups. The Antelope Valley includes the major population centers of the cities of Lancaster and Palmdale, which have an estimated 2014 combined population of approximately 314,902 people. This portion of the Antelope Valley includes a diverse population of residents that includes many individuals that could be considered to be at higher risk of complications due to infection from *Coccidioides* spores. As stated in Section 4.2, Air Quality, persons at the highest risk of developing disseminated Valley Fever include the very young (under 1 year old); adults over 60 years; immunocompromised individuals; people with diabetes; women in the third trimester of pregnancy; and certain ethnic groups, including African-Americans and Filipinos.

The demographics of the two cities include approximately 158,605 females (50.4 percent) and 156,297 males (49.6 percent) with a median age of approximately 30.7 years old. The racial/ethnic composition of the area is approximately 47 percent Latino, 29 percent white, 17 percent African American, and 4 percent Asian (U.S. Census Bureau 2016). As such, the temporary presence of a female inmate population into the Antelope Valley would not introduce a new or unusual demographic into the area that is not already present in the existing population of the region.

The MLWDC property is not located in an area determined to be hazardous to the health of local residents or visitors to the region. The Draft EIR concludes that the potential future inmate population's temporary placement into the Antelope Valley, which includes the inmates' participation in all indoor and outdoor activities at the MLWDC, would not constitute placement into a hazardous existing environmental setting that would require mitigation. Additionally, the operation of the proposed Project would not increase the prevalence of *Coccidioides* spores or otherwise exacerbate an existing environmental condition.

WOC-4

The commenter's concern regarding the potential environmental and other impacts resulting from the Antelope Valley location of the Project is addressed by several different sections of the Draft EIR, including Section 4.13, Transportation and Traffic. The Draft EIR acknowledges that an increase in vehicle miles travelled (VMT) would occur with the Project due to the location of the Project site in relation to the Century Regional Detention Facility (CRDF) in Lynwood, which is closer to higher density urban areas near the City of Los Angeles. As described on pages 4.13-19 through 4.13-20, the Project's Traffic Impact Study estimated that the relocation of inmates to the Mira Loma Women's Detention Center (MLWDC) would result in additional VMT by visitors, inmate buses, and service/delivery trucks when compared to the length of trips required for the CRDF. The worst-case estimate is an increase of 2,500 VMT on a weekday and 25,700 VMT on a weekend day or holiday. No specific significance thresholds related to VMT increases have been adopted by the City of Lancaster or the County of Los Angeles. The use of VMT as a measure of impacts from traffic to replace the Level of Service (LOS) metric for traffic impact analysis is still under review at the California Office of Planning and Research (OPR) and is proposed to be phased in over a two-year period following administrative rulemaking.

The County is aware of the potential challenges this increased distance may pose for some visiting family members, while for other visiting family members from the Lancaster and other County areas, the Project location will be closer to their homes than the current women's jail in Lynwood. Efforts to minimize any inconveniences of increased distance include PDF GHG-2 in Section 4.6, Greenhouse Gas Emissions. The Project will provide a combined minimum of 34 video-visiting stations on site, along with video interview rooms in transitional housing buildings. This is anticipated to reduce VMT associated with vehicle travel to the MLWDC by inmate visitors, while allowing more opportunities for video-visiting than currently exist at CRDF, where most female inmates are housed.

Importantly, the proposed MLWDC will accommodate various forms of visitation, including traditional non-contact visiting, telephone access, video visiting, and contact visiting. Contact visits refer to opportunities for inmates and visitors to interact face to face, allowing for physical contact. Non-contact visits refer to visitations where the inmate and the visitor are separated by a glass barrier, and no physical contact is allowed. Video visits refer to long-distance visitation that can occur through a video conferencing program, allowing the inmate and the visitor to hear and see each other via the computer and screen. Therefore, video visiting is a component of a visiting program. As demonstrated in Table 3-5 of the Draft EIR, the MLWDC would also allow contact visits, which are not currently allowed at CRDF.

Additionally, as demonstrated on page 3-4, in Section 3.0, Project Description, the Board of Supervisors directed the establishment of an Advisory Board (now called the Gender Responsive Advisory Committee) that will report to the Board of Supervisors on specific programmatic and operational issues. The Advisory Committee has already begun to organize its meetings with a membership including representatives of County staff, outside agencies, advocates, organizations, individuals with incarceration experience, and representatives with expertise in reducing recidivism of female inmates. As part of its charge, the Advisory Committee is tasked with reviewing the program model for the proposed MLWDC Project to ensure that it is evidence-based in reducing recidivism; evaluating strategies to reduce negative impacts of operating the proposed MLWDC away from the downtown Los Angeles area, including contract transportation for visitors, video visiting for attorney consultation; and reviewing national best practices for visiting and family reunification.

WOC-5

The purpose of and need for the Project is described in detail in Section 3.1, Project Background, of the Draft EIR. That section provides information regarding the County's existing detention facilities, relevant regulatory mandates, and studies analyzing future facility needs, including for housing of female inmates. The proposed Project does not hinder or preclude the Board of Supervisors' consideration of alternate approaches to incarceration, including the commenter's suggestions regarding out-of-custody alternatives to incarceration.

The proposed Project is not directly intended to decrease the number of incarcerated people, but would reduce recidivism in the long-term. As demonstrated on page 3-17 of Section 3.0, Project Description, the average number of inmates in the Sheriff's Department population has increased due to a substantial number of inmates categorized as "N3" (i.e., non-violent, non-serious, non-sexual) serving their terms in County jail as mandated under Assembly Bill (AB) 109. These inmates are being incarcerated in accordance with established laws, and the process of determining which women are appropriately incarcerated is beyond the scope of this proposed Project. As stated in the Project Objectives in Section 3.0, Project Description, the MLWDC Project would prioritize the on-site integration of gender-responsive female inmate education, treatment, and vocational training to reduce female inmate recidivism. The Project would reduce recidivism through programming and development of a women's detention facility at a site with sufficient space to accommodate both campus-style inmate housing and support facilities for education and vocational training, implementing the best practices of Education Based Incarceration (EBI). Therefore, contrary to the commenter's concern that inmates and their families are "being treated as disposable", the proposed MLWDC Project would prioritize cost-effective therapeutic and rehabilitative programs and promote release-readiness and community reintegration in order to reduce recidivism.

Although the Project site has been unoccupied since 2012, as discussed in Section 2.0, Environmental Setting, the Project site has generally been in operation and providing various detention/jail functions since 1945–1946, when the California Youth Authority began to run a vocational school for juvenile offenders at the site. In the mid-1950s, the MLDC operated as a medium-security facility until it ceased operations for the first time in 1979. It reopened in 1983 and was expanded with the construction of several new buildings in 1986. The facility was repurposed for female inmates and was known as the Mira Loma Female Honor Ranch, but was closed again in 1993. The MLDC reopened for use in 1997 by the U.S. Immigration and Customs Enforcement (ICE) to house undocumented immigrants until their immigration cases were decided, and it operated in that capacity until 2012. The site has not housed inmates since that time. The MLWDC Project proposes the adaptive reuse, renovation, and expansion of the majority of the buildings at MLDC, which is an existing County asset. The redevelopment of the property as the MLWDC would avoid the costs associated with constructing a new facility.

Regarding the County's efforts to reduce the number of incarcerated individuals, the Board of Supervisors has adopted numerous recent actions to reduce the number of people who are incarcerated in Los Angeles County, particularly those with mental illness and/or substance use disorders. The Board of Supervisors' 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 in a document entitled "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".

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 Countywide Criminal Justice Coordination Committee. All Advisory Board members participated in the Countywide 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 of Los Angeles Chief Executive Office (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 Re-Entry (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 of Supervisors determined that the Office will be a part of the Department of Health Services and the Director of the Office will report to the Director of the Department of Health Services. The Director of this Office will be 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 Sheriff, the Fire Chief, the Chief Executive, Superior Court, the Public Defender, the Alternate Public Defender, Probation, the District Attorney, Mental Health, Public Health, and Health Services.

The Office will oversee Countywide diversion efforts including a system of integrated mental, physical and public health care services and 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 of Supervisors directed that future budget allocations be a part of the annual budget process. On September 1, 2015, the Board of Supervisors also directed that the Office distribute funding so at least 1,000 individuals would be diverted across all intercept points within the criminal justice system.

The Criminal Justice Mental Health Advisory Board report of August 2015 concluded that, even with increased opportunities for diversion from a jail environment, there will still be a need for mental health treatment in jails, and that diversion efforts can reduce, but will not eliminate, the need for the County to operate detention facilities (LACDA 2015). In light of the County's diversion efforts, the Board of Supervisors directed that, for purposes of ongoing study and evaluation in the environmental review process, the maximum size of the proposed women's detention center at Mira Loma in Lancaster would remain at 1,604 beds. In addition, the Board of Supervisors reduced the maximum proposed size by approximately 1,000 beds, for purposes of the environmental review of a separate proposed treatment and detention center addressing needs

of incarcerated men and women with mental illness and/or substance use disorders at the site of the current Men's Central Jail in downtown Los Angeles. In summary, the Board of Supervisors has taken steps to reduce the number of people who are incarcerated in Los Angeles County.

WOC-6

This comment is a summary of the concerns expressed in the WOC letter, which has been responded to in WOC-1 through WOC-5. We hope that a review of these responses to your comments, which will be included in the Final EIR, and the information in the Draft EIR referenced will help to address your concerns. The Responses to Comments document, including your comment letter, will be provided to the County of Los Angeles Board of Supervisors so that your concerns will be presented directly to the decision makers prior to consideration of Project approval.

Final Environmental Impact Report

Response to Comments, Mitigation Monitoring and Reporting Program, and Revisions, Clarifications, and Corrections to the Draft EIR

**County of Los Angeles
Mira Loma Women's Detention Center Project
City of Lancaster, California**

SCH No. 2014091012

Volume 2

Prepared for | County of Los Angeles Chief Executive Office
Capital Projects/Debt Management Division
754 Kenneth Hahn Hall of Administration
500 West Temple Street
Los Angeles, California 90012

Prepared by | BonTerra Psomas
225 South Lake Avenue, Suite 1000
Pasadena, California 91101
T: (626) 351-2000 F: (626) 351-2030

September 2016



TABLE OF CONTENTS

<u>Section</u>	<u>Page</u>
<u>Volume 1</u>	
Section 1.0 Introduction	1
1.1 The California Environmental Quality Act and Public Review of the Draft Environmental Impact Report	1
1.2 Project Description.....	4
1.2.1 <i>Project Location and Setting</i>	4
1.2.2 <i>Project Description</i>	5
1.3 Summary of Environmental Impacts.....	6
Section 2.0 Responses to Comments	7
2.1 State, Regional, and Local Agencies.....	8
2.1.1 <i>Antelope Valley Air Quality Management District (AVAQMD)</i>	9
2.1.2 <i>Los Angeles County Fire Department (LACFD)</i>	10
2.1.3 <i>Los Angeles County Sanitation Districts (Districts)</i>	11
2.1.4 <i>State of California Clearinghouse and Planning Unit (SCH)</i>	13
2.1.5 <i>State of California Clearinghouse and Planning Unit (SCH)</i>	14
2.2 Organizations.....	15
2.2.1 <i>Antelope Valley Rural Museum (AVRM)</i>	16
2.2.2 <i>Californians United for a Responsible Budget (CURB)</i>	17
2.2.3 <i>Critical Resistance Los Angeles et al. (CRLA)</i>	20
2.2.4 <i>National Day Laborer Organizing Network (NDLON)</i>	64
2.2.5 <i>National Immigration Law Center (NILC)</i>	67
2.2.6 <i>Weingart</i>	70
2.2.7 <i>Women of Color in the Global Women's Strike (WOC)</i>	102
<u>Volume 2</u>	
2.3 Individuals.....	110
2.3.1 <i>Form Letter</i>	113
2.3.2 <i>Individualized Introductions to Form Letters</i>	122
<u>Volume 3</u>	
2.3.3 <i>Individual Comment Letters</i>	215
Section 3.0 Mitigation Monitoring and Reporting Program.....	389
Section 4.0 Revisions, Clarifications, and Corrections on the Draft EIR.....	411
Section 5.0 References	417

TABLES

<u>Table</u>		<u>Page</u>
3-1	Mitigation Monitoring and Reporting Program.....	390
4-1	Jail Plan Report Summary of Options	415

APPENDICES

Appendices

- A Form Letters
- B Cultural Resources Records Search
- C San Manuel Band of Mission Indians Response to the Project
- D Limited Asbestos and Lead-Based Paint Sampling Report - Buildings 27, 28, 29, 32 and 40
- E California Environmental Reporting System (CERS) database and Monitoring System Certification
- F Supplemental Phase II ESA Soil Sampling Report

2.3 INDIVIDUALS

Responses to state, regional, and local agencies are included in Section 2.1; responses to organizations are included in Section 2.2; and responses to individuals that sent comment letters are included in Section 2.3. Section 2.3 organizes the letters from individuals as follows:

- Section 2.3.1 includes 135 comment letters that were exact duplicates of a sample “form letter”, with only the name of the sender being different. These individually submitted form letters are included in Appendix A of this Final EIR. Responses to the comments in the form letter follow a sample of the text of the form letter and are numbered as Form Letter-1, Form Letter-2, and so on to the end of the responses to each comment in that letter.
- Section 2.3.2 includes the responses to 88 form letters that included individualized introductory comments or some other personalized information, as well as the form letter that is responded to in Section 2.3.1. These 88 comment letters are included in this Responses to Comments document, located on the page prior to the response. For these letters, the comments are numbered as Name – 1, Name -2, and so on to the end of each of the individualized comments that were added to the form letter comments. The responses to the form letter portion of these comment letters references but does not repeat the form letter responses, which are located in Section 2.3.1.
- Section 2.3.3 includes 60 other comment letters and comment cards that were received from individuals, and the responses to those comments. Responses to each of these comment letters and cards from individuals are numbered Name-1, Name -2, and so on to the end of the individual responses to each of the comments in these letters and cards.

Section 2.3.1 "form letter" comments are from the 135 individuals listed alphabetically below. The responses to the numbered comments in this letter are in Section 2.3.1, and copies of each of the form letters sent are in Appendix A of the Final EIR.

- | | |
|-------------------------|----------------------------|
| 1. Allah, Halimah | 23. Castellanos, Violet |
| 2. Allen, Terrie | 24. Caton, Jerome |
| 3. Allin, Eve | 25. Cho, Michelle |
| 4. Alvarenga, Giuliani | 26. Choksi, Neha |
| 5. Amiran, Eyal | 27. Christian, Mary |
| 6. Arace, Marylucia | 28. Clark, Thomas |
| 7. Baker, Cleveland | 29. Cohen, Natalie |
| 8. Baldonado, Rosalinda | 30. Consbruck, Barbara |
| 9. Bates, Abigail | 31. Curtiss, Susan |
| 10. Bautista, Claudia | 32. Delgado, Abraham |
| 11. Berger, Karen | 33. Dominquez Lopez, Cesia |
| 12. Beth Blakey, Mary | 34. Dubois, Jonathan |
| 13. Bowen, Jeffrey | 35. Easley, Joan |
| 14. Brewer, Lynda | 36. Eden, Elana_1 |
| 15. Brown, Shelley | 37. Eden, Elana_2 |
| 16. Burk, Robert | 38. Estrada, Romina |
| 17. Burns, Kathryn | 39. Fang, Betty |
| 18. Burrough, Debra | 40. Folick, Miya |
| 19. Byers, Sharon | 41. Forde, Michael |
| 20. Carlin, Amanda | 42. Frohlich, Corrine |
| 21. Carpenter, Emma | 43. Frye, Roberta |
| 22. Castano, Toro | 44. G, Emma |

- | | |
|-----------------------------|--------------------------|
| 45. Gentile, Sylvia | 91. McGee, Maureen |
| 46. Gerayli, F. | 92. Mendoza, Mariana |
| 47. Glann, Kim | 93. Meux, Mirian |
| 48. Gonzales, Sonia | 94. Meyn, Sarah |
| 49. Gonzalez, Rosa | 95. Miller, Ashley |
| 50. Gonzalez, Sean | 96. Miller, Victoria |
| 51. Goodman, Carolina | 97. Mora, Nydia |
| 52. Gordon, Elizabeth | 98. Morton, Patricia |
| 53. Graves, Marcia | 99. Moss, Jessica |
| 54. Gudis, Catherine | 100. Padilla, Veronica |
| 55. Hathaway, Susan | 101. Payant, David |
| 56. Heng-Lehtinen, Rodrigo | 102. Pena, Suzanne |
| 57. Henry, Diane | 103. Peters, Morgan |
| 58. Higuera, Alicia | 104. Ramirez, Frida |
| 59. Hirschberg, Claire | 105. Reyes, Luis |
| 60. Hofer, Jen | 106. Reynoso, Jareli |
| 61. Hong, Celeste | 107. Rosen, Natalie |
| 62. Humphrey, Morgan | 108. Rubi, Kenia |
| 63. Jackson, Trinity | 109. Rulli, Nicholas |
| 64. Jessler, Darynne | 110. Saba, Samyrha |
| 65. Johnson, Jenna | 111. Samples, Jennifer |
| 66. Johnson, Julie | 112. Sanchez, Sergio |
| 67. Jones, Karen | 113. Standard, Steven |
| 68. Joseph Rosenwald, Peter | 114. Tellez, Gabriela |
| 69. Katz, Marilyn | 115. Tesfai, Nigisti |
| 70. Kempf, Elizabeth | 116. Trujillo, Mary |
| 71. Kempfues, Amanda | 117. Tsao, Christina |
| 72. Kim, Gina | 118. Tsao, Daisy |
| 73. L., Jeanette | 119. Tsao, Joyce |
| 74. Lacques, Grace | 120. Tula, Diandra |
| 75. Leahy, Kristen | 121. Valerio, Stephanie |
| 76. Leandro, Gabrielle | 122. Van Bloemen, Dona |
| 77. Lee, Andrew | 123. Vargas, Angela |
| 78. Leib, Gil | 124. Vg, M |
| 79. Lett, Juliette | 125. Victoria, Jenna |
| 80. Linares, Zoila | 126. W Evans, Michael |
| 81. Lintecum, Brandy | 127. Wade, Jas |
| 82. Long, Bonnie | 128. Wang, Michelle |
| 83. Lopez, Crystal | 129. Whitaker, Audrey |
| 84. Luu, Lillian | 130. Wilson, Robin |
| 85. Macrae, Morgan | 131. Yarbrough, Jim |
| 86. Marcus, Hayley | 132. Zamora, Franchezska |
| 87. Mardani, Amir | 133. Zhang, LiHao |
| 88. Marquez, Brenda | 134. --, Thelma |
| 89. McCorry, Susan | 135. --, Nigisti |
| 90. McDermit, Evan | |

Section 2.3.2 "form letter" comments, which also include individualized comments, are from the 88 individuals listed alphabetically below with page citations. The responses to the individualized portion of each letter are in Section 2.3.2, and the responses to the comments in the form letter are referenced in Section 2.3.2 responses and located in Section 2.3.1.

1. Amsden, Liz	122	45. Johnson, Ellen	167
2. Barker, Rebecca	123	46. Katz, Anjuli Kronheim	168
3. Brewer, Georgia	124	47. Keymah, T'Keyah Crystal	169
4. Brodtkin, Karen	125	48. Khansefid, Ellen	170
5. Bugara, Lyla	126	49. Kittendorff, Eric	171
6. Bustamante, April	127	50. Krylov, Anastasia	172
7. Bynum, Gabrielle	128	51. Kuykendall, Nancy White	173
8. Camacho, Keith	129	52. Larkey, Molly	174
9. Campbell, Dudley and Candace	130	53. Lenz, Colby	175
10. Chávez, David	131	54. Lutz, Adelle	176
11. Choate, Andrew	132	55. Maizlish, Joseph	177
12. Clinton, Kevin	133	56. Marshall, Denise	178
13. Cooper, Irma	134	57. Martinez, Richard	179
14. Corwin, Catherine	135	58. McGee, James Eric	180
15. Council, Vela	136	59. Meshelski, Kristina	181
16. Day, Ali	137	60. Messana, Janet	182
17. Debs, Annette	138	61. Mosco, Oskar	183
18. DeLeon, Tammy	139	62. Murray, Lydia	184
19. Delores, Daphne	140	63. Negovschi, Ari	185
20. DeVincent, John	141	64. Nicholls, Albertine	186
21. Doering, Amy	142	65. Ornelas-Moya, Patricia	187
22. Dollenmayer, Kate	143	66. Pan, Elizabeth	188
23. Dority, Celina	144	67. Patterson, Willie	189
24. Ehrlich, Ken	145	68. Rajkovic, Ada	190
25. Flynn, Charles	146	69. Rigney, Danielle	191
26. Franco, Linda	147	70. Rivas, Anayeli	192
27. Fuss, Marylin	148	71. Rosenwald, Peter	193
28. Garcia, Lucy	149	72. Schick, Laurie	194
29. Giandomenici, Giorgio	150	73. Shehane, Erica	195
30. Gil, Noemi	151	74. Sims, Hilda	196
31. Gomez, Felicia	152	75. Stokes, Kabira	197
32. Gonzalez, Rosa	153	76. Szeto, Andrew	198
33. Guevara, Cambria	154	77. Terada, Rei	199
34. Gutwillig, Stephen	155	78. Terry, Michael	200
35. Healy, Daniel	156	79. Toorawa, Shabina	201
36. Heng-Lehtinen, Rodrigo	157	80. Tutt, Linda	206
37. Heo, Joon	158	81. Valenzuela, Diana	207
38. Hernandez, Eunisses	159	82. Van Iderstine, Nancy	208
39. Hernandez, Marcela	160	83. Villalpando, Alejandro	209
40. Herzog, Lucas	162	84. Waksberg, Harry	210
41. Hill, Tasha	163	85. Weathers, Matthew	211
42. Hutchinson, Chase	164	86. Weeks, Brianna	212
43. Isis-Brown, Anna	165	87. Wood, Benjamin	213
44. Javed, Sara	166	88. Yende, Jasmine	214

FORM LETTER

Subject: Attn: Mira Loma Women's Jail Environmental Impact Report

Dear LA County Chief Exec Office and Board of Supervisors,

Please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

A new jail in Lancaster County will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

Form Letter-1

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

Form Letter-2

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the County of Los Angeles, in extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

Form Letter-3

Form Letter-4

Form Letter-5

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

Form Letter-6

2.3.1 FORM LETTER

Form Letter-1

This comment provides a general introduction to the comment letter and alleges a failure to address environmental impacts and alternatives to the Project. It also characterizes the proposed jail as “unnecessary”, pointing to “jail population reduction measures” such as investment in diversion. The Draft Environmental Impact Report (EIR) for the proposed Project, in fact, addresses environmental impacts and alternatives. It has been prepared in accordance with the California Environmental Quality Act (CEQA, *California Public Resources Code*, Sections 21000 et seq.) and the State CEQA Guidelines (14 *California Code of Regulations* [CCR]), and it addresses the potential direct, indirect, and cumulative impacts of the Project on all applicable environmental issue areas. Sections 4.1 through 4.15 of the Draft EIR provide analyses of potential environmental impacts of Project implementation on the environment. As demonstrated throughout the Draft EIR, all potentially significant environmental impacts have been reduced to levels that are less than significant through application of the identified mitigation measures, and no significant unavoidable environmental impacts would result from Project implementation.

The purpose of and need for the Project is described in detail in Section 3.1, Project Background, of the Draft EIR. That section provides information regarding the County's existing detention facilities, relevant regulatory mandates, and studies analyzing future facility needs, including for housing of female inmates.

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 this Project. Therefore, the proposed Project is consistent with the Board of Supervisors' consideration of policy issues addressing alternative approaches to incarceration, including the commenter's suggestions regarding out-of-custody alternatives.

The Board of Supervisors has adopted numerous recent actions to reduce the number of people who are incarcerated in Los Angeles County, particularly those with mental illness and/or substance use disorders. The Board of Supervisors' 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 in a document entitled “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”.

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 Countywide Criminal Justice Coordination Committee. All Advisory Board members participated in the Countywide 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 of Los Angeles Chief Executive Office (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 Re-Entry (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 of Supervisors determined the Office will be a part of the Department of Health Services and the Director of the Office will report to the Director of the Department of Health Services. The Director of this Office will be 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, the Public Defender, the Alternate Public Defender, Probation, the District Attorney, Mental Health, Public Health, and Health Services.

The Office will oversee Countywide diversion efforts including a system of integrated mental, physical, and public health care services and 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 of Supervisors directed that future budget allocations be a part of the annual budget process. On September 1, 2015, the Board of Supervisors also directed that the Office distribute funding so at least 1,000 individuals would be diverted across all intercept points within the criminal justice system.

The Criminal Justice Mental Health Advisory Board report of August 2015 concluded that, even with increased opportunities for diversion from a jail environment, there will still be a need for mental health treatment in jails and that diversion efforts can reduce, but will not eliminate, the need for the County to operate detention facilities (LACDA 2015). In light of the County's diversion efforts, the Board of Supervisors directed that, for purposes of on-going study and evaluation in the environmental review process, the maximum size of the proposed women's detention center at Mira Loma in Lancaster would remain at 1,604 beds. In addition, the Board of Supervisors reduced the maximum proposed size by approximately 1,000 beds, for purposes of the environmental review of a separate proposed treatment and detention center addressing needs of incarcerated men and women with mental illness and/or substance use disorders at the site of the current Men's Central Jail in downtown Los Angeles. In summary, the Board of Supervisors has taken steps to reduce the number of people who are incarcerated in Los Angeles County.

With respect to the Final EIR alternative analysis, Section 5.0, Project Alternatives, of the Draft EIR was prepared in accordance with Sections 15126.6(a) through 15126.6(f) of the State CEQA Guidelines and adequately considers alternatives to the proposed Project. Out-of-custody alternatives were not required to be analyzed in the Draft EIR beyond the No Project alternative

analyses and they would not be able to achieve the Project's primary goal, as stated below and in Section 5.3.2 of the Draft EIR.

The Project's goal is to provide detention facilities for low- to medium-security level female inmates that meet modern correctional standards and that prioritize the on-site integration of gender-responsive female inmate education, treatment, and vocational training. This goal focuses on providing a secure detention facility with cost-effective therapeutic and rehabilitative programs to meet needs of eligible female inmates in order to reduce recidivism.

Potential environmental impacts associated with "no action" on the proposed Project are described in Alternative 1A, No Project/Continuation of Existing Operations, and Alternative 1B, No Project/Predictable Actions, as demonstrated in Section 5.0, Alternatives. These alternatives provide information regarding the potential impacts to the environment if the County does not move forward with the proposed Project.

The Final EIR, including copies of all comments submitted, will be provided to the County of Los Angeles Board of Supervisors. Therefore, your concerns will be presented directly to the decision makers prior to consideration of Project approval.

Form Letter-2

The commenter's concern regarding the potential environmental and other impacts resulting from the Antelope Valley location of the Project is addressed by several different sections of the Draft EIR, including Section 4.13, Transportation and Traffic. The Draft EIR acknowledges that an increase in vehicle miles travelled (VMT) would occur with the Project due to the location of the Project site in relation to the Century Regional Detention Facility (CRDF) in Lynwood, which is closer to higher density urban areas near the City of Los Angeles. As described on pages 4.13-19 through 4.13-20, the Project's Traffic Impact Study estimated that the relocation of inmates to the Mira Loma Women's Detention Center (MLWDC) would result in additional VMT by visitors, inmate buses, and service/delivery trucks when compared to the length of trips required for the CRDF. The worst-case estimate is an increase of 2,500 VMT on a weekday and 25,700 VMT on a weekend day or holiday. No specific significance thresholds related to VMT increases have been adopted by the City of Lancaster or the County of Los Angeles. The use of VMT as a measure of impacts from traffic to replace the Level of Service (LOS) metric for traffic impact analysis is still under review at the California Office of Planning and Research (OPR) and is proposed to be phased in over a two-year period following administrative rulemaking.

The County is aware of the potential challenges this increased distance may pose for some visiting family members, while for other visiting family members from the Lancaster and other County areas, the Project location will be closer to their homes than the current women's jail in Lynwood. Efforts to minimize any inconveniences of increased distance include PDF GHG-2 in Section 4.6, Greenhouse Gas Emissions. The Project will provide a combined minimum of 34 video-visiting stations on site, along with video interview rooms in transitional housing buildings. This is anticipated to reduce VMT associated with vehicle travel to the MLWDC by inmate visitors, while allowing more opportunities for video-visiting than currently exist at CRDF, where most female inmates are housed.

Importantly, the proposed MLWDC will accommodate various forms of visitation, including traditional non-contact visiting, telephone access, video visiting, and contact visiting. Contact visits refer to opportunities for inmates and visitors to interact face to face, allowing for physical contact. Non-contact visits refer to visitations where the inmate and the visitor are separated by

a glass barrier, and no physical contact is allowed. Video visits refer to long-distance visitation that can occur through a video conferencing program, allowing the inmate and the visitor to hear and see each other via the computer and screen. Therefore, video visiting is a component of a visiting program. As demonstrated in Table 3-5 of the Draft EIR, the MLWDC would also allow contact visits, which are not currently allowed at CRDF.

Additionally, as demonstrated on page 3-4, in Section 3.0, Project Description, the Board of Supervisors directed the establishment of an Advisory Board (now called the Gender Responsive Advisory Committee) that will report to the Board of Supervisors on specific programmatic and operational issues. The Advisory Committee has already begun to organize its meetings with a membership including representatives of County staff, outside agencies, advocates, organizations, individuals with incarceration experience, and representatives with expertise in reducing recidivism of female inmates. As part of its charge, the Advisory Committee is tasked with reviewing the program model for the proposed MLWDC Project to ensure that it is evidence-based in reducing recidivism; evaluating strategies to reduce negative impacts of operating the proposed MLWDC away from the downtown Los Angeles area, including contract transportation for visitors, video visiting for attorney consultation; and reviewing national best practices for visiting and family reunification.

Regarding the commenter's concern about potential increases in smog and air pollution, Section 4.2, Air Quality, presents the results of the emission analysis using California Emissions Estimator Model (CalEEMod) Version 2013.2.2. This computer program is used to calculate anticipated emissions associated with land development projects in California, including emissions from vehicles traveling to and from the Project site. As shown in Table 4.2-7 of Section 4.2, Air Quality, the estimated annual operational emissions due to Project-related operations would not exceed the Antelope Valley Air Quality Management District (AVAQMD) CEQA significance thresholds, and potential impacts would be less than significant. In fact, emissions were well below the thresholds of significance. For example, carbon monoxide (CO) was the air contaminant with the highest annual rate of emission, and the Project was estimated to emit 18 tons per year, which is less than significant when compared to the AVAQMD threshold of significance of 100 tons per year.

Regarding the commenter's concern about potential impacts to public transportation and the road system, Section 4.13, Transportation and Traffic, of the Draft EIR discusses potential impacts related to Project-generated traffic. The analysis indicates that increase in traffic volumes would not significantly impact local intersections (intersections would still operate at LOS D or better), or alternative transportation (Metrolink trains or AVTA bus service), and impacts on California Department of Transportation (Caltrans) facilities would be less than significant. As discussed on page 4.13-23 and 4.13-24, the existing transit services in the area will adequately accommodate the increase in Project-generated transit trips. No mitigation is required for short-term construction or long-term operational traffic impacts.

Form Letter-3

The Draft EIR provides information directly addressing the commenter's concern regarding potential on-site hazardous material creating potential health risks. The Project site is listed in government databases due to past hazardous material uses. However, the site was never operated as a site that accepted hazardous wastes for disposal. The Project site is on the list of Leaking Underground Storage Tanks (LUST) Sites, but the leaking underground storage tanks have been removed, and the affected area has been cleaned up. The County Department of Public Works oversaw the remediation and issued the "no further action" letter. The California Department of Toxic Substances Control (DTSC) lists the Polaris Flight Academy with a status of

“inactive-needs evaluation”. A Phase 1 Environmental Site Assessment (ESA) was prepared to identify Recognized Environmental Concerns (RECs) at the site and a Phase II ESA was prepared to further evaluate the RECs. As part of those studies, soil borings collected in the area of the possible former location of the airstrip were evaluated and the results did not detect any contaminants that would require further action. Thus, the listing of the site in government databases was based on past uses that no longer pose hazards (Converse 2015).

As part of the environmental analysis for the Draft EIR, the Phase I ESA reviewed past and current uses and site conditions and identified RECs on the Project site and surrounding area. The Phase I ESA is provided in Appendix E-1 of the Draft EIR. Subsequent to the Phase I ESA, a Phase II ESA was prepared that included soil sampling to determine if soil contamination is present on the site. The Phase II ESA is provided in Appendix E-3 of the Draft EIR. In addition, an Asbestos and Lead Based Paint Survey Report was completed to identify the building components that contained asbestos and lead-based paint. The Asbestos and Lead Based Paint Survey Report is provided in Appendix E-2 of the Draft EIR. These reports are summarized in Section 4.7, Hazards and Hazardous Materials, of the Draft EIR.

The proposed Project must comply with existing regulatory requirements (RRs) for the proper handling of hazardous wastes, including transportation, treatment, storage, and disposal; repair and/or removal of underground storage tanks based on applicable standards; and practices that would protect the demolition and construction crews from asbestos and lead exposure. In addition, the Project must incorporate mitigation measures (MMs) for the handling of suspected asbestos-containing materials and lead-based paint; an Operations and Maintenance Plan for regular inspection of any asbestos-containing materials; and testing and repair of underground storage tanks prior to use. Thus, existing hazardous materials and wastes would be removed from the Project site and future hazardous materials use would comply with applicable regulations to prevent hazards to future inmates. In summary, compliance with RRs and implementation of MMs set forth in the Draft EIR would prevent public health and safety hazards to inmates, employees, visitors and other individuals at the Project site.

The Phase II ESA included 14 soil borings to depths of 8 feet below the ground surface (bgs). All soil samples from two and four feet bgs were analyzed for Total Petroleum Hydrocarbons (TPH), Volatile Organic Compounds (VOCs), and metals in accordance with U.S. Environmental Protection Agency (USEPA) Test Methods 8015M, 8260B, and 6010B/7471A, respectively (Converse 2015). As stated on page 4.7-18 of the Draft EIR, the soil analyses indicate that no volatile organic compounds (VOCs) are present in the soil samples. All reported metals, except arsenic, were found to be at levels below the California Human Health Screening Levels (CHHSLs) for both residential and commercial/industrial land. The arsenic levels are below the background level of 12 milligrams per kilogram (mg/kg) level that the DTSC has determined to be naturally occurring background levels at school sites in California. The findings of the Phase II ESA indicated that there is no soil contamination on the site (Converse 2015). With no contamination identified near-surface soils, it is unlikely that groundwater contamination would be present, considering that groundwater levels in the Antelope Valley Groundwater Basin in 2006 were estimated at 120 feet bgs at the Project site (RWMG 2013).

In summary, the Phase II ESA concludes that there is no soil or groundwater contamination on the Project site requiring remediation or other mitigation measures (Converse 2015). Existing hazardous materials in various buildings would be removed, transported, and disposed of in accordance with existing regulations. Mitigation Measures (MMs) HAZ-1 and HAZ-2 would be implemented for the handling of remaining building materials that may contain asbestos and lead-based paint; and MM HAZ-3 would be implemented for the reuse of other facilities near the Project site. Further, the use, storage, handling, transport, and disposal of hazardous materials during

operation of the proposed MLWDC would be made in compliance with existing regulations. Accordingly, the Draft EIR concludes that the Project's hazardous material impacts would be less than significant. Therefore, neither the female inmate population, nor visitors or workers at the MLWDC would be put at risk.

Form Letter-4

The comment expresses concern that water demand for the proposed MLWDC, when considered with current demands, will negatively impact groundwater resources. The Project's projected water usage is addressed in Section 4.14, Utilities and Service Systems. The Project's estimated water demand is less than the 250 acre-feet per year (afy) threshold established by the California Department of Water Resources (DWR) for requiring a Water Supply Assessment (WSA) for the proposed Project under legislation commonly referred to as Senate Bill (SB) 610, as described further in Section 4.14 of the Draft EIR. Nonetheless, to provide informed decision-making, a WSA was prepared for the Project and provided in Appendix G-2 of the Draft EIR. The WSA is also summarized in Section 4.14. As required under SB 610, the WSA must include an evaluation of the sufficiency of the water supplies available to the water supplier to meet existing and anticipated future demands (including the demand associated with the project) over a 20-year horizon that includes normal, single-dry, and multiple-dry years. The multiple-dry year scenario would represent drought conditions. With implementation of MM UTL-1, the Los Angeles County Waterworks District No. 40 (LACWWD 40), which will be the Project's water supplier, would have the water supply needed to serve the Project. MM UTL-1 requires that the County sign the New Water Supply Entitlement Acquisition Agreement with LACWWD 40 and pay a deposit of \$10,000 per acre-foot of annual water demand from the Project for the acquisition of additional water supplies from Antelope Valley – East Kern Water Agency (AVEK) to serve the Project.

With implementation of MM UTL-1, Project-related estimates for water supply and demand, as provided in the WSA, show that water supply is available to serve the Project during the average year, single-dry year, and multiple-dry years. The WSA concludes the information on record indicates a sufficient and reliable water supply for LACWWD 40, now and into the future, including a sufficient water supply for the Project (Psomas 2015). These supplies are also sufficient to provide for existing demands and demands from overall growth in the LACWWD 40 service area at the rate projected in the 2010 Integrated Regional Urban Water management Plan (IRUWMP) (LACWWD 40 2011).

Form Letter-5

The comment expresses concern about exposure to Valley Fever, both in the construction and operational phases of the proposed Project. *Coccidioidomycosis*, also known as Valley Fever, and its potential impact on local residents, potential future inmates, and County staff is discussed in Section 4.2, Air Quality. A summary of hazards associated with the *Coccidioides* spores (i.e., the fungus that causes Valley Fever) that are found in native soil is provided, as well as summaries of trends related to Valley Fever in Los Angeles County, as inventoried and reported by the Los Angeles County Department of Public Health (LACDPH), which was consulted during the preparation of the Draft EIR.

The Draft EIR includes an analysis of exposure hazards due to fugitive dust that may result from construction-related earth-moving activities, and identifies several Project Design Features (PDFs) and Regulatory Requirements (RRs) to minimize any exposure risks. PDF AIR-1, which will be included in the Contractor's Specification and monitored through the Mitigation Monitoring and Reporting Program (MMRP), requires the distribution of materials on Valley Fever, or any updated materials as applicable, to worksite supervisors and construction workers. PDF AIR-2

and RR AIR-1, which will be included in the Contractor's Specification and monitored through the MMRP, require compliance with Best Management Practices and AVAQMD Rule 403 for the prevention of fugitive dust and nuisance air contaminants. RR AIR-1 provides a listing of the most applicable AVAQMD Rules. Rule 403, Fugitive Dust, requires measures such as watering and control of track-out from the site, as well as submittal of a Dust Control Plan prior to the start of construction. Rule 403 requires control of fugitive dust and avoidance of nuisance, and Rule 402 prohibits the emission of quantities of air contaminants that could cause injury, detriment, nuisance, or annoyance to the public, or that endanger the comfort, repose, health or safety of the public. With implementation of RR AIR-1, on-site earth-moving activities would not result in fugitive dust that could affect adjacent off-site land uses.

As stated in RR AIR-2, the Project will be constructed in compliance with the Department of Health – Infection Control Policy Guidelines Procedure No. 918.01. Policy 918 is intended to prevent the spread of diseases that may be caused by construction-induced airborne pollution in susceptible individuals (patients, staff, and the public) at Department of Health Services (DHS) facilities. The protocols and requirements mandate the designation of an Infection Control Coordinator who must review and approve infection-control plans for new construction or renovation projects to ensure a safe environment. These infection-control plans must include infection-control measures to contain dust, debris, and other elements and protect the patients, employees, and visitors in this environment. The Infection Control Coordinator has independent authority to stop construction-related activities immediately when the public may be adversely affected by infection-control hazards generated during construction-related activities and when the infection-control precautions and/or engineering controls are inadequate to contain the hazard. The Draft EIR provides that exposure to Valley Fever during construction activities would be less than significant, and no mitigation is required.

Section 4.2, Air Quality, acknowledges that the future inmate population has the potential to be exposed to dust generated from soils in the Antelope Valley, which have the potential to contain *Coccidioides* spores, during operation of the proposed Project. As discussed in Section 3.0, Project Description, of the Draft EIR, according to the Sheriff's Department, Assembly Bill (AB) 109 female inmates are serving an average of 423 days in custody from date of sentencing to date of release, while non-AB 109 female inmates serve an average of 107 days in custody. Therefore, the length of time that inmates would be living at the MLWDC is temporary, and is not equivalent to a permanent living circumstance or the longer sentences in state prisons that house higher-security inmates.

The Draft EIR summarizes the LACDPH *2013 Annual Morbidity Report*, which presents the recent trends related to Valley Fever in Los Angeles County, including an increasing incidence rate for coccidioidomycosis in the last ten years. However, the overall incidence rate in the Antelope Valley has not warranted changes to date in the County's protocol for disease prevention, notwithstanding the fact that the County health and public health officials are well educated on the condition; are familiar with its incidence in the County and elsewhere in the state; and are involved in research and education on the subject of Valley Fever.

The LACDPH has not identified the previous U.S. Immigration and Customs Enforcement (ICE) detainee population at the MLDC, the future inmate population at MLWDC, or earlier occupants at the High Desert Health System (HDHS) Multi-Ambulatory Care Center (MACC) (the adjacent hospital facility, which has relocated in Lancaster) as requiring the implementation of health screening protocols or other measures to address potential Valley Fever exposure.

Also, as demonstrated in Section 4.2, Air Quality, the California Department of Corrections and Rehabilitation (CDCR) has not identified the Lancaster area as being a geographic location that requires screening or interventions for the State prison population with regard to exposure to Valley Fever (CDCR 2013).

The operation of the MLWDC will follow standard Sheriff's Department procedures for medical care and prevention with regard to health care for inmates in general, and Valley Fever specifically, and the Sheriff's Department will continue to coordinate with the LACDPH (Masis 2015). The LACDPH is the designated County agency with the mandate to protect health, prevent disease, and promote the health and well-being of all persons in Los Angeles County. As such, any future changes in LACDPH policies that may be made regarding Valley Fever for inmate populations will be implemented, as applicable, throughout the County jail system.

Because the future inmate population's exposure to disturbed soils would be limited to gardening activities, PDF AIR-3 states that the Project will import gardening soils from outside the Antelope Valley, which would be used in raised planting beds to remove gardening in native soils as a potential source of exposure to *Coccidioides* spores. Further, outdoor recreational areas and other non-paved areas on the Project site would be covered with landscaping, turf grass, gravel, or landscaping/wood chip ground cover that would minimize the opportunity for soils to become airborne.

The Antelope Valley has not been identified by the LACDPH, the Antelope Valley Air Quality Management District (AVAQMD), or any other governmental health agency as a region that should be avoided by the elderly, women, children, health-compromised individuals, or by any specific ethnic groups. The Antelope Valley includes the major population centers of the cities of Lancaster and Palmdale, which have an estimated 2014 combined population of approximately 314,902 people. This portion of the Antelope Valley includes a diverse population of residents that includes many individuals that could be considered to be at higher risk of complications due to infection from *Coccidioides* spores. As stated in Section 4.2, Air Quality, persons at the highest risk of developing disseminated Valley Fever include the very young (under 1 year old); adults over 60 years; immunocompromised individuals; people with diabetes; women in the third trimester of pregnancy; and certain ethnic groups, including African-Americans and Filipinos.

The demographics of the two cities include approximately 158,605 females (50.4 percent) and 156,297 males (49.6 percent) with a median age of approximately 30.7 years old. The racial/ethnic composition of the area is approximately 47 percent Latino, 29 percent white, 17 percent African American, and 4 percent Asian (U.S. Census Bureau 2016). As such, the temporary presence of a female inmate population into the Antelope Valley would not introduce a new or unusual demographic into the area that is not already present in the existing population of the region.

The MLWDC property is not located in an area determined to be hazardous to the health of local residents or visitors to the region. The Draft EIR concludes that the potential future inmate population's temporary placement into the Antelope Valley, which includes the inmates' participation in all indoor and outdoor activities at the MLWDC, would not constitute placement into a hazardous existing environmental setting that would require mitigation. Additionally, the operation of the proposed Project would not increase the prevalence of *Coccidioides* spores or otherwise exacerbate an existing environmental condition.

Form Letter-6

This comment is a summary of the concerns expressed in the letter, which have been responded to in the responses for Form Letter-1 through Form Letter-5 above, and your conclusion that the proposed new jail "should be rejected". We hope that a review of these responses to your comments, and responses to the comments of others, all of which will be included in the Final EIR, as well as the referenced information in the Draft EIR will help to address your concerns. The Responses to Comments document, including your comment letter, will be provided to the County of Los Angeles Board of Supervisors so that your concerns will be presented directly to the decision makers prior to consideration of Project approval.

From: Liz Amsden <LizAmsden@hotmail.com>
Sent: Friday, February 05, 2016 12:23 PM
To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental; lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov; FifthDistrict@lacbos.org
Subject: Attn: Mira Loma Women's Jail Environmental Impact Report

Dear LA County Chief Exec Office and Board of Supervisors,

As well as what follows, I strongly OPPOSE the jail on the following grounds.

One, we need to spend this money on affordable housing and start solving some of the problems that lead to crime.

And, two, as a taxpayer I am offended that my taxes are being used to sustain the 'Prison-Industrial Complex' which does everything in its power to expand its income.

The US has more people in prison than ANY other country including China and Russia. We represent 5% of the world's population but we incarcerate 25% of the world's prisoners, 33% of the world's female prisoners.

This is despicable. And I am ashamed of my state and my country in its embracing of policies that created and further these statistics.

Please consider the foregoing along with this, my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

A new LA county jail in Lancaster will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the County of Los Angeles, in extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

Amsden-1

Please refer to responses to form letter

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

} Cont.

--
Liz Amsden
LizAmsden@hotmail.com

2.3.2 INDIVIDUALIZED INTRODUCTIONS TO FORM LETTERS

Liz Amsden (February 5, 2016)

Amsden-1

The commenter opposes the jail and instead wants money spent on affordable housing and crime prevention. She alleges that her taxes are used to sustain the jail system, which does everything to expand its income. She also provides comparative statistics on US prisoners and expresses general strong opposition to the proposed project.

The Environmental Impact Report (EIR) relates to a public local jail and not a private for profit prison. This comment relates to the merits of the proposed Project and not the environmental analysis included in the Draft EIR or the environmental impacts of the Project.

Please refer to responses for Form Letter-1 through Form Letter-6 for remaining comments.

-----Original Message-----

From: Rebecca Barker [mailto:opinion5000@gmail.com]
Sent: Wednesday, March 02, 2016 12:08 PM
To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental <environmental@ceo.lacounty.gov>; lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov; FifthDistrict@lacbos.org
Subject: Attn: Mira Loma Women's Jail Environmental Impact Report

Dear LA County Chief Exec Office and Board of Supervisors,

The prison industry drains our communities and local governments of funds that need to be invested in more effective, long-term solutions for struggling and disadvantaged individuals.

} Barker-1

Please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

A new LA county jail in Lancaster will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

} Please refer to responses to form letter

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the County of Los Angeles, in extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

--

Rebecca Barker
opinion5000@gmail.com
936 W Foothill Blvd
Azusa, CA 91702

Rebecca Barker (March 2, 2016)

Barker-1

The commenter alleges that the prison industry drains funds that are needed for more effective, long-term solutions for struggling and disadvantaged individuals. 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 has a concurrent focus on diversion from incarceration as it considers this Project. Therefore, the proposed Project is consistent with the Board of Supervisor's consideration of policy issues addressing alternative approaches to incarceration.

Please refer to responses for Form Letter-1 through Form Letter-6 for remaining comments.

-----Original Message-----

From: Georgia Brewer [mailto:georgiabrewer@gmail.com]

Sent: Friday, February 05, 2016 5:16 PM

To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental <environmental@ceo.lacounty.gov>; lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov; FifthDistrict@lacbos.org

Subject: Attn: Mira Loma Women's Jail Environmental Impact Report

Dear LA County Chief Exec Office and Board of Supervisors,

I strongly believe that more jails are no solution, and I have personal experience to back up my belief. My brother, who was introduced to drugs as a teenager in foster care, was consistently "punished" with ever greater jail time as he repeatedly went back to feeding his drug habit with a life of crime. At no point in his life did the exposure to jails and prisons make a single difference in the trajectory of his decline. He only grew ill in jail - sick in mind and body - until he died at the age of 45. He needed treatment, not jail.

My brother's story is nothing new. But what's new is that these days locking people up has become a profitable venture with mutual backslapping between sheriff's departments, prison guard unions, municipal leaders, property developers and construction companies. We are investing our resources entirely wrong! And all this building in remote locations merely separates inmates from their families and damages the environment of the prison site! It's just wrong, wrong, wrong.

So please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

A new LA county jail in Lancaster will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the County of Los Angeles, in extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current

Brewer-1

Please refer to responses to form letter

residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

} Cont.

--
Georgia Brewer
georgiabrewer@gmail.com
5518 Ventura Canyon Avenue
Sherman Oaks, California 91401

Georgia Brewer (February 5, 2016)

Brewer-1

The commenter opposes more jails because of her brother who was in and out of jail until he died. She alleges that locking people up has become a profitable venture between public agencies and private companies.

Thank you for your comment generally sharing your family's experience. The Los Angeles County owns the proposed Project site and the Sheriff's Department, which would operate the proposed MLWDC, would not make a profit on the facility.

Regarding the commenter's concern about building in remote locations, please refer to the response for Form Letter-2. For concern about damage to the environment, the Draft EIR for the proposed Project has been prepared in accordance with the California Environmental Quality Act (CEQA, *California Public Resources Code*, Sections 21000 et seq.) and the State CEQA Guidelines (*California Code of Regulations* [CCR], Title 14), and addresses the potential direct, indirect, and cumulative impacts of the Project on all environmental issue areas.

Please refer to responses for Form Letter-1 through Form Letter-6 for remaining comments.

-----Original Message-----

From: Karen Brodtkin [mailto:kbrodtkin@anthro.ucla.edu]

Sent: Monday, February 29, 2016 3:16 PM

To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental <environmental@ceo.lacounty.gov>; lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov; FifthDistrict@lacbos.org

Subject: Attn: Mira Loma Women's Jail Environmental Impact Report

Dear LA County Chief Exec Office and Board of Supervisors,

I can think of so many things we can really use public funding for: housing for homeless; generally affordable housing; fixing sidewalks, roads & bridges; cleaning up toxic pollution--esp. around the Exide plant. We already have the highest national rate of incarceration in the world. Women especially alternatives to prison because many of their crimes are minor, and because their children suffer incredibly.

Brodtkin-1

Please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

A new LA county jail in Lancaster will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

Please refer to responses to form letter

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the County of Los Angeles, in extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

} Cont.

--

Karen Brodtkin
kbrodtkin@anthro.ucla.edu
Venice, CA 90291

Karen Brodtkin (February 29, 2016)

Brodtkin-1

This comment relates to the use of public funds for other things and the need for alternatives to the incarceration of women. The purpose of and need for the Project is described in detail in Section 3.1, Project Background, of the Draft EIR. That section provides information regarding the County's existing detention facilities, relevant regulatory mandates, and studies analyzing future facility needs, including for housing of female inmates. The proposed jail planning is set in the context of the County's other programmatic and financial support of diversion from incarceration. The County has a concurrent focus on diversion from incarceration as it considers this Project. Therefore, the proposed Project is consistent with the Board of Supervisor's consideration of policy issues addressing alternative approaches to incarceration.

Please refer to responses for Form Letter-1 through Form Letter-6 for remaining comments.

-----Original Message-----

From: Lyla Bugara [mailto:lyla.bugara@gmail.com]

Sent: Tuesday, January 12, 2016 4:49 PM

To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental <environmental@ceo.lacounty.gov>; lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov; FifthDistrict@lacbos.org

Subject: Attn: Mira Loma Women's Jail Environmental Impact Report

Dear LA County Chief Exec Office and Board of Supervisors,

I strongly oppose the building of a new women's prison in Lancaster. Prisons are responsible for untold human suffering and cause serious negatives impacts to the environment. There is no such thing as a good prison.

} Bugara-1

Please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

A new LA county jail in Lancaster will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

} Please refer to responses to form letter

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the County of Los Angeles, in extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

--

Lyla Bugara
lyla.bugara@gmail.com
1806 Bonita Ave Apt A
Berkeley, California 94709

Lyla Bugara (January 12, 2016)

Bugara-1

The commenter opposes the new women's prison and alleges that prisons cause human suffering and cause serious negative impacts on the environment. 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 has a concurrent focus on diversion from incarceration as it considers this Project. Therefore, the proposed Project is consistent with the Board of Supervisor's consideration of policy issues addressing alternative approaches to incarceration.

Regarding the comment on negative impacts on the environment, as demonstrated throughout the Draft EIR, all potentially significant impacts have been reduced to levels that are less than significant through the identified mitigation measures and no significant unavoidable environmental impacts would result from Project implementation.

Please refer to responses for Form Letter-1 through Form Letter-6 for remaining comments.

Original Message-----

From: April Bustamante [mailto:555bustamante@gmail.com]

Sent: Wednesday, January 06, 2016 9:59 PM

To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental <environmental@ceo.lacounty.gov>; lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov; FifthDistrict@lacbos.org

Subject: Attn: Mira Loma Women's Jail Environmental Impact Report

Dear LA County Chief Exec Office and Board of Supervisors,

I believe jails are not as much of a benefit as people would like them to be.

Please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

A new jail in Lancaster County will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the County of Los Angeles, in extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

--

April Bustamante

} Bustamante-1



Please refer to responses to form letter

555bustamante@gmail.com
445 Western
Los Angeles , California 90020

April Bustamante (January 6, 2016)

Bustamante-1

The introduction to this comment indicates the view that maybe jails are not as beneficial as they are desired to be. This comment relates to the merits of the proposed Project and not the environmental analysis included in the Draft Environmental Impact Report (EIR) or the environmental impacts of the Project.

Please refer to responses for Form Letter-1 through Form Letter-6 for remaining comments.

-----Original Message-----

From: Gabrielle Bynum [mailto:gabrielle.bynum@yahoo.com]

Sent: Wednesday, March 02, 2016 12:03 PM

To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental <environmental@ceo.lacounty.gov>; lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov; FifthDistrict@lacbos.org

Subject: Attn: Mira Loma Women's Jail Environmental Impact Report

Dear LA County Chief Exec Office and Board of Supervisors,

Our system of "correctional facilitation" has been proven to be ineffective.

Please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

A new LA county jail in Lancaster will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the County of Los Angeles, in extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

} Bynum-1

} Please refer to responses to form letter

--

Gabrielle Bynum
gabrielle.bynum@yahoo.com
7035 Woodley Ave, Unit 215
Van Nuys, California 91406

Gabrielle Bynum (March 2, 2016)

Bynum-1

This comment alleges that the jail system is ineffective. This comment relates to the merits of the proposed Project and not the environmental analysis included in the Draft Environmental Impact Report (EIR) or the environmental impacts of the Project.

Please refer to responses for Form Letter-1 through Form Letter-6 for remaining comments.

-----Original Message-----

From: Keith Camacho [mailto:kcamacho@g.ucla.edu]

Sent: Wednesday, January 06, 2016 1:43 PM

To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental <environmental@ceo.lacounty.gov>; lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov; FifthDistrict@lacbos.org

Subject: Attn: Mira Loma Women's Jail Environmental Impact Report

Dear LA County Chief Exec Office and Board of Supervisors,

Dear Colleagues,

Greetings. My name is Keith L. Camacho, and I am an associate professor at UCLA. I am writing to protest the proposal to build another jail facility in Los Angeles. Instead, please use the monies allocated for this facility for pro-reactive measures, as with providing increased educational, employment, and medical resources for the residents of this and other cities in California. Your support is greatly appreciated.

} Camacho-1

If you have any questions, you can reach me at 310-267-5592.

Sincerely,

Keith L. Camacho, Ph.D

PS:

Please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

A new jail in Lancaster County will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

} Please refer to responses to form letter

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the County of Los Angeles, in extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

Cont.

--

Keith Camacho
kcamacho@g.ucla.edu
3336 Rolfe Hall, UCLA
Los Angeles, California 90095

Keith Camacho (January 6, 2016)

Camacho-1

The commenter states that he is an associate professor at UCLA and opposes the Project. He asks that the money for this facility be used for proactive measures and for providing increased educational, employment and medical resources.

The purpose of and need for the Project is described in detail in Section 3.1, Project Background, of the Draft EIR. That section provides information regarding the County's existing detention facilities, relevant regulatory mandates, and studies analyzing future facility needs, including for housing of female inmates. The proposed jail planning is set in the context of the County's other programmatic and financial support of diversion from incarceration. The County has a concurrent focus on diversion from incarceration as it considers this Project. Therefore, the proposed Project is consistent with the Board of Supervisor's consideration of policy issues addressing alternative approaches to incarceration.

Please refer to responses for Form Letter-1 through Form Letter-6 for remaining comments.

-----Original Message-----

From: Dudley and Candace Campbell [mailto:cdcampbl@roadrunner.com]
Sent: Friday, February 05, 2016 1:25 PM
To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental <environmental@ceo.lacounty.gov>; lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov; FifthDistrict@lacbos.org
Subject: Attn: Mira Loma Women's Jail Environmental Impact Report

Dear LA County Chief Exec Office and Board of Supervisors,

It is not time to build more jails, but rather look into why we have more incarcerated people than any other country. The system needs to be rebuilt, and not more structures to demonstrate our failure as a nation to solve our social issues.

Please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

A new LA county jail in Lancaster will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the County of Los Angeles, in extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

Campbell-1

Please refer to responses to form letter

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

} Cont.

--

Dudley and Candace Campbell
cdcampbl@roadrunner.com
13167 Ortley Place
Valley Glen, CA 91401-1329

Dudley and Candace Campbell (February 5, 2016)

Campbell-1

The commenters do not want more jails and want the system to be rebuilt, such that no more jails are used to solve our social issues. This comment relates to the merits of the proposed Project and not the environmental analysis included in the Draft Environmental Impact Report (EIR) or the environmental impacts of the Project.

Please refer to responses for Form Letter-1 through Form Letter-6 for remaining comments.

From: David Chávez <dfchavez86@gmail.com>
Sent: Friday, February 05, 2016 12:45 PM
To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental; lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov; FifthDistrict@lacbos.org
Subject: Attn: Mira Loma Women's Jail Environmental Impact Report

Dear LA County Chief Exec Office and Board of Supervisors,

As a parent and resident of LA County, I completely disagree with the proposal to build a new jail in Lancaster, or anywhere in LA County. Our current Jail system, one of the largest in the entire country, state, and world, is already being mismanaged, full of human rights abuses, and holds majority of people who have not been convicted of anything and are too impoverished to post the exorbitant amount of bail. My child, the city I live in, and LA County will not be safer or more financially secure with a new jail.

Chávez-1

Secondly, please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

A new LA county jail in Lancaster will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

Please refer to responses to form letter

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the County of Los Angeles, in extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

--
David Chávez
dfchavez86@gmail.com

1796 El Sereno Avenue
Pasadena, California 91103

David Chávez (February 5, 2016)

Chávez-1

The commenter does not want the County to build a new jail in Lancaster and alleges that the current jail system is mismanaged. This comment relates to the merits of the proposed Project and not the environmental analysis included in the Draft Environmental Impact Report (EIR) or the environmental impacts of the Project.

Please refer to responses for Form Letter-1 through Form Letter-6 for remaining comments.

-----Original Message-----

From: Andrew Choate [mailto:ralphleo@sbcglobal.net]

Sent: Thursday, January 07, 2016 12:58 PM

To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental <environmental@ceo.lacounty.gov>; lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov; FifthDistrict@lacbos.org

Subject: Attn: Mira Loma Women's Jail Environmental Impact Report

Dear LA County Chief Exec Office and Board of Supervisors,

I teach in jails and yet I don't support new construction. Taxpayer dollars should go toward prevention and rehabilitation and therapy, not punishment. The privatization of incarceration is even scarier. Don't build this jail.

Choate-1

Please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

A new LA county jail in Lancaster will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

Please refer to responses to form letter

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the County of Los Angeles, in extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

--

Andrew Choate
ralphleo@sbcglobal.net
213 1/2 N. Ave. 49
Los Angeles, California 90042

Andrew Choate (January 7, 2016)

Choate-1

The author identifies himself an educator who works in jails and who does not support the renovation of the site for the proposed facility. He further indicates strong concern about "privatization" of incarceration. The proposed MLWDC would not be a privately-operated facility. The Los Angeles County owns the proposed Project site and the Sheriff's Department, which would operate the proposed MLWDC, would not make a profit on the facility. This comment relates to the merits of the proposed Project, and not the environmental analysis included in the Draft EIR or the environmental impacts of the Project.

Please refer to responses for Form Letter-1 through Form Letter-6 for remaining comments.

From: Kevin Clinton <kevinclintonpro@gmail.com>
Sent: Monday, February 08, 2016 3:39 PM
To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental; lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov; FifthDistrict@lacbos.org
Subject: Attn: Mira Loma Women's Jail Environmental Impact Report

Dear LA County Chief Exec Office and Board of Supervisors,

The building of prisons has been a continued poor investment by our society into beating down the beaten. The statistics speak for themselves according to the UltraViolet women prisoners: 82% are survivors of severe child abuse. 1 in 10 minimally will be sexually assaulted in prison, 1 in 25 will give birth in prison while being shackled, 75% of women prisoners are survivors of domestic violence, and black women are three times more likely to be put in prison than than white women. Prison has continually been filled since the 1970s with the most vulnerable within our society. It is time we reallocate our resources not to destroy the lives of those that are already destroyed, but to uplift our most vulnerable. We as a society cannot do that until we stop investing our county resources into prisons and torturing those who have already been harmed by everyone else.

Clinton-1

As a citizen of Los Angeles County, I urge you to vote against the building of this prison.

"This isn't Justice." Ultraviolet. web. 2/8/2016.

Please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

A new LA county jail in Lancaster will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

Please refer to responses to form letter

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the County of Los Angeles, in extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during

construction local residents would be at increased risk due to displacement of dry soils. After completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

Cont.

--
Kevin Clinton
kevinclintonpro@gmail.com
Artesia, CA 90701
Citizen

Kevin Clinton (February 8, 2016)

Clinton-1

This comment relates statistics on women inmates and asks that resources be reallocated away from prisons. He also states opposition to the Project. 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 has a concurrent focus on diversion from incarceration as it considers this Project. Therefore, the proposed Project is consistent with the Board of Supervisor's consideration of policy issues addressing alternative approaches to incarceration.

Please refer to responses for Form Letter-1 through Form Letter-6 for remaining comments.

-----Original Message-----

From: Irma Cooper [mailto:irmacooper@charter.net]

Sent: Wednesday, January 06, 2016 2:14 PM

To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental <environmental@ceo.lacounty.gov>; lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov; FifthDistrict@lacbos.org

Subject: Attn: Mira Loma Women's Jail Environmental Impact Report

Dear LA County Chief Exec Office and Board of Supervisors,

Good afternoon, Sir/Ma'am

I am a concerned citizen, and a mother. I am strongly opposed to the building of a women jail in Lancaster. I strongly support other alternatives to keep families together like community programs with security monitoring. Jails are not the answer they only breed criminal behavior on staff and inmates; its a loose/loose situation.. Building a jails so far from the inmates family and friends will only have negative outcomes. Family members will not be able to afford to travel such a long distance and isolate inmates from their loved ones and family members.

Cooper-1

Inmate Safety is critical. The proposed site is a known "hazardous waste site". This will expose healthy inmates, staff and visitors to hazards which make cause cancers and other chronic long term disease. Building on known hazardous waste site will open the city, county and state for lawsuits costing the tax payers millions of dollars. The money saved from lawsuits could go into effective community programs to help inmates improve their lives, obtain jobs and change the criminal justice system for better outcomes.

Cooper-2

Please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

A new jail in Lancaster County will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

Please refer to responses to form letter

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor

pervious area". This puts prisoners at the jail, in custody of the County of Los Angeles, in extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

Cont.

Thanks

Irma Cooper

--

Irma Cooper
irmacooper@charter.net
2326 Coronet Court
Covina, CA 91724-3935

Irma Cooper (January 6, 2016)

Cooper-1

The commenter opposes the building of a womens' jail in Lancaster and supports other alternatives. The purpose of and need for the Project is described in detail in Section 3.1, Project Background, of the Draft EIR. That section provides information regarding the County's existing detention facilities, relevant regulatory mandates, and studies analyzing future facility needs, including for housing of female inmates. The proposed jail planning is set in the context of the County's other programmatic and financial support of diversion from incarceration. The County has a concurrent focus on diversion from incarceration as it considers this Project. Therefore, the proposed Project is consistent with the Board of Supervisor's consideration of policy issues addressing alternative approaches to incarceration.

Regarding the comment on families not affording to travel a long distance, please refer to the response for Form Letter-2 for a discussion of increased travel distances and public transportation. In addition to contact and non-contact visits, the proposed MLWDC will provide video visiting options.

Cooper-2

Regarding the comment that the site is a hazardous waste site, the Project site was never operated as a site that accepted hazardous wastes for disposal. The response for Form Letter-3 provides additional discussion of this issue.

Please refer to responses for Form Letter-1 through Form Letter-6 for remaining comments.

-----Original Message-----

From: Catherine Corwin [mailto:catcorwin@gmail.com]

Sent: Monday, February 29, 2016 12:33 PM

To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental <environmental@ceo.lacounty.gov>; lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov; FifthDistrict@lacbos.org

Subject: Attn: Mira Loma Women's Jail Environmental Impact Report

Dear LA County Chief Exec Office and Board of Supervisors,

A very bad idea to building something toxic for humans to be exposed to? Who does that? I am a Human that want's all Human's to be treated Humanly!

} Corwin-1

Please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

A new LA county jail in Lancaster will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

} Please refer to responses to form letter

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the County of Los Angeles, in extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

--

Catherine Corwin

catcorwin@gmail.com

2325 Kansas Avenue, #17

Santa Monica, CA 90404

None - Just a Human that want's all Human's to be treated Humanly!

Catherine Corwin (February 29, 2016)

Corwin-1

The commenter's introductory concern is that the Project site would be "toxic" to humans. This comment is responded to by the analysis in the EIR that demonstrates there will be no environmentally significant adverse environmental impacts with the Project and also specifically as summarized in the incorporated response for Form Letter-3 relating to hazardous wastes.

Please refer to responses for Form Letter-1 through Form Letter-6 for remaining comments.

-----Original Message-----

From: Vela Council [mailto:velamarie@gmail.com]

Sent: Wednesday, January 06, 2016 1:48 PM

To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental <environmental@ceo.lacounty.gov>; lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov; FifthDistrict@lacbos.org

Subject: Attn: Mira Loma Women's Jail Environmental Impact Report

Dear LA County Chief Exec Office and Board of Supervisors,

This jail will be health care issue for LA County residents in the future!

Please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

A new jail in Lancaster County will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the County of Los Angeles, in extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

--

Council-1

Please refer to responses to form letter

Vela Council
velamarie@gmail.com
50 Elm Ave Unit 9
Long Beach, California 90802-4916

Vela Council (January 6, 2016)

Council-1

This comment alleges that the proposed Project will be a health care issue for Los Angeles County in the future. The Draft Environmental Impact Report (EIR) for the proposed Project has been prepared in accordance with the California Environmental Quality Act (CEQA, *California Public Resources Code*, Sections 21000 et seq.) and the State CEQA Guidelines (14 *California Code of Regulations* [CCR]), and addresses the potential direct, indirect, and cumulative impacts of the Project on all environmental issue areas. As demonstrated throughout the Draft EIR, all potentially significant impacts have been reduced to levels that are less than significant through the identified mitigation measures, and no significant unavoidable environmental impacts would result from Project implementation.

Please refer to responses for Form Letter-1 through Form Letter-6 for remaining comments.

-----Original Message-----

From: Ali Day [mailto:aliday720@gmail.com]

Sent: Wednesday, January 06, 2016 12:48 PM

To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental <environmental@ceo.lacounty.gov>; lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov; FifthDistrict@lacbos.org

Subject: Attn: Mira Loma Women's Jail Environmental Impact Report

Dear LA County Chief Exec Office and Board of Supervisors,

First of all, I oppose the creation of all new jails. Jails do not help rehabilitate people. We should focus resources on community programs that help keep people from re-offending, and begin closing jails which only cause further trauma to people that they cannot recover from.

} Day-1

Please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

A new jail in Lancaster County will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

} Please refer to responses to form letter

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the County of Los Angeles, in extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

--

Ali Day

aliday720@gmail.com

LOS ANGELES, California 90029

Ali Day (January 6, 2016)

Day-1

The commenter opposes the creation of all new jails and alleges that they do not help rehabilitate people and, thus, should be closed. The commenter also wants community programs to prevent people from reoffending.

Although the Project site has been unoccupied since 2012, as discussed in Section 2.0, Environmental Setting, the Project site has generally been in operation and providing various detention/jail functions since 1945–1946, when the California Youth Authority began to run a vocational school for juvenile offenders at the site. The MLWDC Project proposes the adaptive reuse, renovation, and expansion of the majority of the buildings at the Mira Loma Detention Center (MLDC), which is an existing County asset. The redevelopment of the property would avoid the costs associated with constructing a new facility.

In relation to reducing recidivism, the proposed Project's primary goal is stated below and in Section 5.3.2 of the Draft EIR.

The Project's goal is to provide detention facilities for low- to medium-security level female inmates that meet modern correctional standards and that prioritize the on-site integration of gender-responsive female inmate education, treatment, and vocational training. This goal focuses on providing a secure detention facility with cost-effective therapeutic and rehabilitative programs to meet needs of eligible female inmates in order to reduce recidivism.

The Project will offer general education classes, computer training, general and vocational career technical education, college courses, career counseling, a learning resource center, a library and computer labs, culinary classes, and indoor/outdoor recreation for inmates. Other services include religious services, counseling services, and community transition services. Participation in classes, training, and other activities will be scheduled for each inmate according to individual evaluation, interests, needs, and availability.

Course selections will be determined based on a student's needs for specific services and students' interest levels. Courses will be offered during three blocks of time each weekday (morning, afternoon, and evening), providing opportunities for inmates to be enrolled in multiple courses. Programs are also divided into three categories based on program intensity: all-day, half-day, and evening programs. Examples of all-day programs (morning and afternoon) include culinary arts programs, cosmetology programs, and Prisoner Assisted Community Enhancement (PACE). Examples of half-day programs (morning or afternoon) include small engine repair; animal grooming/training; social media management and marketing/office assistant; automotive detailing, windshield, and headlight repair; and recycling. Examples of evening programs include computer coding; small business entrepreneurship; community college; Associate of Arts Degree; and General Education. Other programs include prenatal programs, volunteer programs, peer mentoring, physical education, dance, arts and crafts, a commissary program, and book clubs.

Please refer to responses for Form Letter-1 through Form Letter-6 for remaining comments.

-----Original Message-----

From: Annette Debs [mailto:adcsj@sbcglobal.net]

Sent: Saturday, February 06, 2016 5:07 AM

To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental <environmental@ceo.lacounty.gov>; lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov; FifthDistrict@lacbos.org

Subject: Attn: Mira Loma Women's Jail Environmental Impact Report

Dear LA County Chief Exec Office and Board of Supervisors,

[Insert brief introductory message why you oppose jail] I think it is abominable that a women's jail would be built in such an area that would expose women to the potential of serious illness (Valley Fever) and the toxic materials in the soil and the pipes.

} Debs-1

Please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

A new LA county jail in Lancaster will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

} Please refer to responses to form letter

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the County of Los Angeles, in extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

--

Annette Debs
adcsj@sbcglobal.net
507 N.inwood Ave.
Santa Ana, California 92701

Annette Debs (February 6, 2106)

Debs-1

The commenter expresses opposition to the women's jail due to allegations relating to the potential for serious illness (Valley Fever) and toxic materials in the soil and pipes. These issues have been addressed in the EIR as reviewed in the referenced responses to your comments, which are marked as Form Letter 3 and Form Letter-5 in the Form Letter above.

Please refer to responses for Form Letter-1 through Form Letter-6 for remaining comments.

-----Original Message-----

From: Tammy DeLeon [mailto:mzladyjez@gmail.com]

Sent: Wednesday, January 06, 2016 9:40 PM

To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental <environmental@ceo.lacounty.gov>; lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov; FifthDistrict@lacbos.org

Subject: Attn: Mira Loma Women's Jail Environmental Impact Report

Dear LA County Chief Exec Office and Board of Supervisors,

I, Tammy DeLeon, oppose the new Mira Loma jail proposal

Please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

A new jail in Lancaster County will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the County of Los Angeles, in extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

--

} DeLeon-1

} Please refer to responses to form letter

Tammy DeLeon
mzladyjez@gmail.com
445 S. Western Ave Apt #317
Los Angeles, California 90020

Tammy DeLeon (January 6, 2016)

DeLeon-1

The commenter opposes the proposed jail. This comment relates to the merits of the proposed Project and not the environmental analysis included in the Draft Environmental Impact Report (EIR) or the environmental impacts of the Project.

Please refer to responses for Form Letter-1 through Form Letter-6 for remaining comments.

Original Message-----

From: Daphne Delores [mailto:ddelores@mindspring.com]

Sent: Monday, February 29, 2016 10:52 PM

To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental <environmental@ceo.lacounty.gov>; lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov; FifthDistrict@lacbos.org

Subject: Attn: Mira Loma Women's Jail Environmental Impact Report

Dear LA County Chief Exec Office and Board of Supervisors,

City of Los Angeles, a corporation, is not working for the people of Los Angeles, but for its owners. If another jail is needed, let it be for all the corrupt crooked bankers, politicians and their cronies, period! Otherwise, we don't need it! Release all women incarcerated for victimless crimes and you will have all the space you need.

} Delores-1

Please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

A new LA county jail in Lancaster will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

} Please refer to responses to form letter

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the County of Los Angeles, in extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

--

Daphne Delores
ddelores@mindspring.com

Daphne Delores (February 29, 2016)

Delores-1

This comment talks about the City of Los Angeles not working for the people and expresses opposition to another jail. This comment relates to the merits of the proposed Project and not the environmental analysis included in the Draft Environmental Impact Report (EIR) or the environmental impacts of the Project.

Please refer to responses for Form Letter-1 through Form Letter-6 for remaining comments.

From: John DeVincent <jdevincent@roadrunner.com>
Sent: Friday, February 05, 2016 12:59 PM
To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental; lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov; FifthDistrict@lacbos.org
Subject: Attn: Mira Loma Women's Jail Environmental Impact Report

Dear LA County Chief Exec Office and Board of Supervisors,

I don't believe we need more jails built, it doesn't make us safer and we need to focus more on rehabilitation and treatment, not incarceration. I want the funds from Prop 47 to go to treatment, not jails.

Please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

A new LA county jail in Lancaster will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the County of Los Angeles, in extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

--
John DeVincent
jdevincent@roadrunner.com
18331 Kittridge St., Apt 9
Reseda, CA 91335
Los Angeles County resident

DeVincent-1

Please refer to responses to form letter

John DeVincent (February 5, 2016)

DeVincent-1

The commenter does not believe in the need for more jails and states that there should be more focus on rehabilitation and treatment programs. The purpose of and need for the Project is described in detail in Section 3.1, Project Background, of the Draft EIR. That section provides information regarding the County's existing detention facilities, relevant regulatory mandates, and studies analyzing future facility needs, including for housing of female inmates. The proposed jail planning is set in the context of the County's other programmatic and financial support of diversion from incarceration. The County has a concurrent focus on diversion from incarceration as it considers this Project. Therefore, the proposed Project is consistent with the Board of Supervisor's consideration of policy issues addressing alternative approaches to incarceration.

Please refer to responses for Form Letter-1 through Form Letter-6 for remaining comments.

Original Message-----

From: Amy Doering [mailto:doeringamy@yahoo.com]

Sent: Wednesday, January 06, 2016 1:11 PM

To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental <environmental@ceo.lacounty.gov>; lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov; FifthDistrict@lacbos.org

Subject: Attn: Mira Loma Women's Jail Environmental Impact Report

Dear LA County Chief Exec Office and Board of Supervisors,

We need to make sure the land is not toxic for both prisoners and it's workers alike.

All prisons need to be humane and should be in a place close for family visitations.

Please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

A new jail in Lancaster County will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the County of Los Angeles, in extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

} Doering-1

} Please refer to responses to form letter

Amy Doering (January 6, 2016)

Doering-1

The commenter's introductory concern is that the proposed Project would be located on what is alleged to be "toxic" land. She also states that all prisons must be "humane" and "close" for visiting purposes. Regarding the comment on the site being toxic land, Section 4.7, Hazards and Hazardous Materials, of the Draft EIR addresses this issue. Also, please refer to the response for Form Letter-3. Regarding the travel distance for inmate visitors, please refer to the response for Form Letter-2.

Please refer to responses for Form Letter-1 through Form Letter-6 for remaining comments.

-----Original Message-----

From: Kate Dollenmayer [mailto:dollenmayer@gmail.com]

Sent: Sunday, January 10, 2016 5:14 PM

To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental <environmental@ceo.lacounty.gov>; lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov; FifthDistrict@lacbos.org

Subject: Attn: Mira Loma Women's Jail Environmental Impact Report

Dear LA County Chief Exec Office and Board of Supervisors,

I do not believe that this project is in the best interest of the citizens of California.

} Dollenmayer-1

Please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

A new LA county jail in Lancaster will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

} Please refer to responses to form letter

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the County of Los Angeles, in extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

--
Kate Dollenmayer

dollenmayer@gmail.com
190 Monterey Rd., Apt. C
South Pasadena, California 91030

Kate Dollenmayer (January 10, 2016)

Dollenmayer-1

This comment alleges that the Project is not in the best interest of the citizens of California. This comment relates to the merits of the proposed Project and not the environmental analysis included in the Draft Environmental Impact Report (EIR) or the environmental impacts of the Project.

Please refer to responses for Form Letter-1 through Form Letter-6 for remaining comments.

Original Message-----

From: Celina Dority [mailto:cairfuldriver@gmail.com]

Sent: Monday, February 29, 2016 4:15 PM

To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental <environmental@ceo.lacounty.gov>; lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov; FifthDistrict@lacbos.org

Subject: Attn: Mira Loma Women's Jail Environmental Impact Report

Dear LA County Chief Exec Office and Board of Supervisors,

To whom it may concern:

I beg you, Please, !!! Get a Life and Get some Pride . . .

!!! Women are the Marrow of our World . . .

??? Whatcha thencing, subjecting WomahNz huh haz b_com accideNtaL pRizeNeRz . . . to fuRtheR HeLibeRtaN by LockiNg them uhp uNder uNbeaRabL & uNacceptabL & baRbaRic aNd absoLuteLy NoNNuRtuRouz, GuaNtamiNo coNditioNz . . .

??? WheRez ouR PRide . . .

??? RNT we AmeRicaNz . . .

PuNish, ihv NecessaRy, foR thiz oR that they seRiouhz oR Not so seRiouhz uhveNz may oR may Not b giUlt t o iN a Racizt, sexiZt, baRbaRic system, but ???b_have cRimiNaLLy BACK to them . . . Az Low oR weRz Low az aNy cRime they doN cuz yuh The AuthoRih t & Need to pRactihz CompassioN / wizdom / faith / NuRtuRiNg / & foRgivNez ihv NezzecaRyevEN ihv foRgettiNg Not aLwayz smaRt . . .

It makez NO seNse . . .

Do somthiNg WIZER w/ \$ that you az feLLo OmeRicaNz & feLLo eaRthLiNgz caN b PRoud o _

DoNt b ERRoRthLiNgz & build a RotteN JaiL . . . INteNdd to kiL aNy hope that theze whoahNz _ & ouR pLaNet _ may hav Left . . .

Please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

A new LA county jail in Lancaster will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

} Dority-1

} Please refer to responses to form letter

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the County of Los Angeles, in extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

Please refer to responses to form letter (cont.)

--
Celina Dority
cairfuldriver@gmail.com
858 3rd Ave
Chula Vista, CA 91911
Earthling

Celina Dority (February 29, 2016)

Dority-1

This introductory comment urges rejection of a proposal characterized as a "rotten jail" and relates to the merits of the proposed Project, and not the environmental analysis included in the Draft EIR or the environmental impacts of the Project.

Please refer to responses to Form Letter-1 through Form Letter-6 for remaining comments.

-----Original Message-----

From: Ken Ehrlich [mailto:ken@kenehrlich.net]

Sent: Tuesday, January 12, 2016 11:41 AM

To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental <environmental@ceo.lacounty.gov>; lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov; FifthDistrict@lacbos.org

Subject: Attn: Mira Loma Women's Jail Environmental Impact Report

Dear LA County Chief Exec Office and Board of Supervisors,

As a teacher and long time resident of L.A. county, I am completely opposed to the construction of a new jail facility in Lancaster. Beyond the urgent need to reallocate resources away from incarceration and towards reinvestment in programs that will facilitate the long term health of L.A. county residents, this project raises significant environmental concerns. Not only does the proposed facility likely pose health risks to future inmates but situating the facility so far outside of the city center is environmentally unsound.

Ehrlich-1

Please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

A new LA county jail in Lancaster will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

Please refer to responses to form letter

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the County of Los Angeles, in extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After

completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

} Cont.

--
Ken Ehrlich
ken@kenehrlich.net
1835 Wollam St.
L.A., California 90065

Ken Ehrlich (January 12, 2016)

Ehrlich-1

The commented states that he is a teacher and LA County resident and opposes the new jail facility. He wants resources reallocated away from incarceration and towards reinvestment. The proposed jail planning is set in the context of the County's other programmatic and financial support of diversion from incarceration. The County has a concurrent focus on diversion from incarceration as it considers this Project. Therefore, the proposed Project is consistent with the Board of Supervisor's consideration of policy issues addressing alternative approaches to incarceration.

Regarding the comments on health risks to future inmates and the facility's location outside the City center, please refer to the responses for Form Letter-3 and Form Letter-2, respectively.

Also, please refer to responses for Form Letter-1 through Form Letter-6 for remaining comments.

-----Original Message-----

From: Charles Flynn [mailto:editor@beyondwarispeace.com]

Sent: Wednesday, January 06, 2016 3:53 PM

To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental <environmental@ceo.lacounty.gov>; lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov; FifthDistrict@lacbos.org

Subject: Attn: Mira Loma Women's Jail Environmental Impact Report

Dear LA County Chief Exec Office and Board of Supervisors,

It is important that we stop doing more of the same when it hasn't worked in the past. This proposed Woman's Jail is one of those things.

} Flynn-1

Please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

A new jail in Lancaster County will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

} Please refer to responses to form letter

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the County of Los Angeles, in extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

--

Charles Flynn
editor@beyondwarispeace.com
91201

Charles Flynn (January 6, 2016)

Flynn-1

This comment introduction summarizes the author's view that the women's jail proposal is an example of continuing to do what he characterizes as not having worked in the past and should be stopped. The comment relates to the merits of the proposed Project and not the environmental analysis included in the Draft Environmental Impact Report (EIR) or the environmental impacts of the Project.

Please refer to responses to Form Letter-1 through Form Letter-6 for remaining comments.

-----Original Message-----

From: linda franco [mailto:lmcf4477@gmail.com]

Sent: Thursday, January 07, 2016 5:37 PM

To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental <environmental@ceo.lacounty.gov>; lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov; FifthDistrict@lacbos.org

Subject: Attn: Mira Loma Women's Jail Environmental Impact Report

Dear LA County Chief Exec Office and Board of Supervisors,

[Totally against this! Too much traffic, pollution and overcrowding in the city. Also feel it's an ugly structure that would ruining the city sky and landscape]

} Franco-1

Please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

A new LA county jail in Lancaster will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

} Please refer to responses to form letter

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the County of Los Angeles, in extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

--

linda franco
lmcf4477@gmail.com
9000 hwy 60
guston, ky 40142

Linda Franco (January 7, 2016)

Franco-1

The commenter expresses opposition to the Project due to traffic, pollution, overcrowding, and an ugly structure. The Draft Environmental Impact Report (EIR) discusses potential impacts related to Project-generated traffic in Section 4.13, Transportation and Traffic; potential increases in air pollution in Section 4.2, Air Quality; and the potential of the project to induce growth in Lancaster and the Antelope Valley in Section 4.11, Population and Housing.

Regarding the commenter's concern about the ugly structure ruining the city sky and landscape, Section 4.1, Aesthetics, analyzes the changes in visual quality that would occur with the Project. As demonstrated throughout the Draft EIR, all potentially significant impacts have been reduced to levels that are less than significant through the identified mitigation measures and no significant unavoidable environmental impacts would result from Project implementation.

Please refer to responses for Form Letter-1 through Form Letter-6 for remaining comments.

-----Original Message-----

From: Marilyn Fuss [mailto:marilynfuss@sbcglobal.net]

Sent: Wednesday, January 06, 2016 6:15 PM

To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental <environmental@ceo.lacounty.gov>; lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov; FifthDistrict@lacbos.org

Subject: Attn: Mira Loma Women's Jail Environmental Impact Report

Dear LA County Chief Exec Office and Board of Supervisors,

To Whom it May Concern:

I am a retired teacher, so my concern for young people, the opportunities they do and don't have, and what happens to them in their lives is built into my mind set. I feel we need fewer, not more prisons. People who commit crimes where no one else is a victim do not belong in long-term facilities. They should be at home and under the probation system. Better education can help prevent others from committing violent crimes. I'd like to see more money spent on educating high-risk youth. Of course, there is a need for high-security prisons for people who are a danger to others, but even those need to be humane, and the health risks in Lancaster sound like a prison there is a bad idea.

Fuss-1

Please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

A new jail in Lancaster County will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

Please refer to responses to form letter

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the County of Los Angeles, in extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during

construction local residents would be at increased risk due to displacement of dry soils. After completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

} Cont.

--

Marilyn Fuss
marilynfuss@sbcglobal.net
3310 Tyburn Street
Los Angeles, , CA 90039

Marylin Fuss (January 6, 2016)

Fuss-1

The commenter states that there is no need for more prisons and the use of money on probation and better education for high-risk youth can deter crimes. She states that high-security prisons need to be humane and that the health risks in Lancaster make the prison a bad idea. 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 has a concurrent focus on diversion from incarceration as it considers this Project. Therefore, the proposed Project is consistent with the Board of Supervisor's consideration of policy issues addressing alternative approaches to incarceration.

Regarding the comment on the health risks in Lancaster, Section 4.7, Hazards and Hazardous Materials, of the Draft EIR addresses this issue and Section 4.2, Air Quality, discusses potential impacts related to Valley Fever. Also, please refer to the response for Form Letter-3 for a discussion of hazardous materials and the response for Form Letter-5 for a discussion of Valley Fever.

Please refer to responses for Form Letter-1 through Form Letter-6 for remaining comments.

-----Original Message-----

From: Lucy Garcia [mailto:lucyagarcia@sbcglobal.net]

Sent: Monday, February 29, 2016 1:17 PM

To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental <environmental@ceo.lacounty.gov>; lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov; FifthDistrict@lacbos.org

Subject: Attn: Mira Loma Women's Jail Environmental Impact Report

Dear LA County Chief Exec Office and Board of Supervisors,

I see it every day: I'm a high school teacher in an area of poverty. People need help. Women are confused, trying their best, overwhelmed. Kids are being led to blame them. Communities need to have more institutions of compassionate resolution of problems, not jails. The rates of incarceration that we have in California should be a source of deep thought, deep revision of our direction. Noone's "profit," noone's "job," and certainly no budget deficit due to the construction of yet another jail should come between us and the design of better ways to help women and families. It recently came out that to keep one child in juvenile jail for a year cost well over \$200,000. There are far better ways to help that family and the community.

Garcia-1

Please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

A new LA county jail in Lancaster will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

Please refer to responses to form letter

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the County of Los Angeles, in extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After

completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

} Cont.

--

Lucy Garcia
lucyagarcia@sbcglobal.net
20725 Lemarsh St Unit F
Chatsworth, CA 91311-7352
teacher

Lucy Garcia (February 29, 2016)

Garcia-1

The commenter discusses the problems she sees as a teacher and wants more institutions of compassionate resolution of problems, which would better help families and the community. 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 has a concurrent focus on diversion from incarceration as it considers this Project. Therefore, the proposed Project is consistent with the Board of Supervisor's consideration of policy issues addressing alternative approaches to incarceration.

Please refer to responses for Form Letter-1 through Form Letter-6 for remaining comments.

Original Message-----

From: Giorgio Giandomenici [mailto:giando29@gmail.com]

Sent: Tuesday, March 01, 2016 12:20 AM

To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental <environmental@ceo.lacounty.gov>; lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov; FifthDistrict@lacbos.org

Subject: Attn: Mira Loma Women's Jail Environmental Impact Report

Dear LA County Chief Exec Office and Board of Supervisors,

Don't build a new jail for women. MONEY FOR WOMEN AND COMMUNITIES NOT FOR JAILS!

Please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

A new LA county jail in Lancaster will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the County of Los Angeles, in extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

--

Giorgio Giandomenici

} Giandomenici-1



Please refer to responses to form letter

giando29@gmail.com
San Polo 2029
Venice . Italy 30125

Giorgio Giandomenici (March 1, 2016)

Giandomenici-1

The commenter opposes the building of a new jail for women. This comment relates to the merits of the proposed Project and not the environmental analysis included in the Draft Environmental Impact Report (EIR) or the environmental impacts of the Project.

Please refer to responses for Form Letter-1 through Form Letter-6 for remaining comments.

-----Original Message-----

From: Noemi Gil [mailto:Lovenoemig@gmail.com]

Sent: Thursday, January 07, 2016 12:13 PM

To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental <environmental@ceo.lacounty.gov>; lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov; FifthDistrict@lacbos.org

Subject: Attn: Mira Loma Women's Jail Environmental Impact Report

Dear LA County Chief Exec Office and Board of Supervisors,

Jails are not the answer.

Please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

A new jail in Lancaster County will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the County of Los Angeles, in extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

--
Noemi Gil

} Gil-1
Please refer to responses to form letter

Lovenoemig@gmail.com

Noemi Gil (January 7, 2016)

Gil-1

The commenter states that jails are not the answer. This comment relates to the merits of the proposed Project and not the environmental analysis included in the Draft Environmental Impact Report (EIR) or the environmental impacts of the Project.

Please refer to responses for Form Letter-1 through Form Letter-6 for remaining comments.

-----Original Message-----

From: Felicia Gomez [mailto:fgomez@caimmigrant.org]

Sent: Wednesday, January 06, 2016 5:42 PM

To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental <environmental@ceo.lacounty.gov>; lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov; FifthDistrict@lacbos.org

Subject: Attn: Mira Loma Women's Jail Environmental Impact Report

Dear LA County Chief Exec Office and Board of Supervisors,

I oppose the jail because I believe in community led alternatives and people's potential, as opposed to jails that destroy and further criminalize our communities. I want money to be invested in our well-being, educational programs, community based programs and NOT into another jail.

} Gomez-1

Please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

A new jail in Lancaster County will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

} Please refer to responses to form letter

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the County of Los Angeles, in extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

--

Felicia Gomez
fgomez@caimmigrant.org
Los Angeles, CA 90027

Felicia Gomez (January 6, 2016)

Gomez-1

The commenter opposes the jail and alleges that it destroys and further criminalizes our communities. She prefers community based alternatives and educational programs. This comment relates to the merits of the proposed Project and not the environmental analysis included in the Draft Environmental Impact Report (EIR) or the environmental impacts of the Project. Also, please refer to the response for Form Letter-1 for alternatives that the County is considering and has implemented to reduce the number of people who are incarcerated in Los Angeles County.

Please refer to responses for Form Letter-1 through Form Letter-6 for remaining comments.

-----Original Message-----

From: Rosa Gonzalez [mailto:rozygg93@hotmail.com]

Sent: Wednesday, January 06, 2016 6:55 PM

To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental <environmental@ceo.lacounty.gov>; lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov; FifthDistrict@lacbos.org

Subject: Attn: Mira Loma Women's Jail Environmental Impact Report

Dear LA County Chief Exec Office and Board of Supervisors,

I oppose the new jail construction as it will be an inefficient and ineffective method for crime reduction in the county of Los Angeles.

} Gonzales-1

Please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

A new jail in Lancaster County will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

} Please refer to responses to form letter

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the County of Los Angeles, in extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

--

Rosa Gonzalez
rozygg93@hotmail.com

Rosa Gonzalez (January 6, 2016)

Gonzalez-1

The commenter opposes the new jail and alleges that it will be inefficient and ineffective at crime reduction. The proposed jail planning is set in the context of the County's other programmatic and financial support of diversion from incarceration. The County has a concurrent focus on diversion from incarceration as it considers this Project. Therefore, the proposed Project is consistent with the Board of Supervisor's consideration of policy issues addressing alternative approaches to incarceration.

Please refer to responses for Form Letter-1 through Form Letter-6 for remaining comments.

Original Message-----

From: Cambria Guevara [mailto:Cmgmeow@gmail.com]

Sent: Tuesday, March 01, 2016 9:06 PM

To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental <environmental@ceo.lacounty.gov>; lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov; FifthDistrict@lacbos.org

Subject: Attn: Mira Loma Women's Jail Environmental Impact Report

Dear LA County Chief Exec Office and Board of Supervisors,

I believe no more jails should be made and we should have our money spent on schools. Please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

A new LA county jail in Lancaster will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the County of Los Angeles, in extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

--
Cambria Guevara
Cmgmeow@gmail.com

} Guevara-1



Please refer to responses to form letter

Cambria Guevara (March 1, 2016)

Guevara-1

The comment author advocates for spending money on schools and not jails. This comment relates to the merits of the proposed Project and not the environmental analysis included in the Draft Environmental Impact Report (EIR) or the environmental impacts of the Project.

Please refer to responses for Form Letter-1 through Form Letter-6 for remaining comments.

-----Original Message-----

From: Stephen Gutwillig [mailto:stephen@gutwillig.com]

Sent: Wednesday, January 06, 2016 2:13 PM

To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental <environmental@ceo.lacounty.gov>; lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov; FifthDistrict@lacbos.org

Subject: Attn: Mira Loma Women's Jail Environmental Impact Report

Dear LA County Chief Exec Office and Board of Supervisors,

Expanding jails doesn't make me and my family feel safer. Building a new women's jail in Lancaster flies in the face of the growing consensus that we have to reduce incarceration and support community-based alternatives to locking people up. What's more, the environmental and health risks are too great - building on a hazardous materials site, exposing inmates to Valley Fever and making families travel long distances. Please don't worsen over-incarceration in California. Please choose more effective and environmentally-friendly alternatives.

Gutwillig-1

Please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

A new jail in Lancaster County will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

Please refer to responses to form letter

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the County of Los Angeles, in extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

} Cont.

--

Stephen Gutwillig
stephen@gutwillig.com
1318 McCollum St
Los Angeles, California 90026

Stephen Gutwillig (January 6, 2016)

Gutwillig-1

The commenter expresses opposition to the Project and wants to reduce incarceration and support community-based alternatives. The proposed jail planning is set in the context of the County's other programmatic and financial support of diversion from incarceration. The County has a concurrent focus on diversion from incarceration as it considers this Project. Therefore, the proposed Project is consistent with the Board of Supervisor's consideration of policy issues addressing alternative approaches to incarceration.

Regarding the comment on environmental and health risks, the Draft EIR for the proposed Project has been prepared in accordance with the California Environmental Quality Act (CEQA, *California Public Resources Code*, Sections 21000 et seq.) and the State CEQA Guidelines (14 *California Code of Regulations* [CCR]), and addresses the potential direct, indirect, and cumulative environmental impacts of the Project on all environmental issue areas. As demonstrated throughout the Draft EIR, all potentially significant impacts have been reduced to levels that are less than significant through the identified mitigation measures, and no significant unavoidable environmental impacts would result from Project implementation.

Regarding the comment on the site being a hazardous materials site, please refer to the response for Form Letter-3. Regarding the commenter's concern for exposing inmates to Valley Fever, please refer to the response for Form Letter-5. Regarding the longer distance that visiting families have to travel, please refer to the response for Form Letter-2.

Please refer to responses for Form Letter-1 through Form Letter-6 for remaining comments.

-----Original Message-----

From: Daniel Healy [mailto:daniel@vpcgla.org]

Sent: Friday, January 08, 2016 11:23 AM

To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental <environmental@ceo.lacounty.gov>; lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov; FifthDistrict@lacbos.org

Subject: Attn: Mira Loma Women's Jail Environmental Impact Report

Dear LA County Chief Exec Office and Board of Supervisors,

To whom it may concern,

I strongly oppose the proposed women's jail in Lancaster. As the son of a parent who acquired valley fever while incarcerated and still suffers from it, I cannot stand the thought of putting others at risk of acquiring this terrible disease. Please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

} Healy-1

A new LA county jail in Lancaster will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

} Please refer to responses to form letter

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the County of Los Angeles, in extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

--

Daniel Healy
daniel@vpcgla.org
1000 N. Alameda St.
Los Angeles, CA 90012

Daniel Healy (January 8, 2016)

Healy-1

The commenter's introductory comment identifies him as strongly opposed to the proposed project due to dangers of Valley Fever. He also indicates that he has a parent suffering from the effects of Valley Fever from a former incarceration at an unspecified location and time period.

Thank you for your comment generally sharing your family's experience. The Valley Fever issue has been disclosed and addressed in the Draft EIR and responses to comments including but not limited to the incorporated response for Form Letter-5 on this issue. These responses reflect both awareness and attention to the potential for this disease and its prevention as well as ongoing collaboration between the County's public health officers and the Sheriff on these issues with respect to the proposed project.

Please refer to responses for Form Letter-1 through Form Letter-6 for remaining comments.

-----Original Message-----

From: Rodrigo Heng-Lehtinen [mailto:rodrigolehinen@gmail.com]
Sent: Saturday, February 06, 2016 9:07 AM
To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental <environmental@ceo.lacounty.gov>; lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov; FifthDistrict@lacbos.org
Subject: Attn: Mira Loma Women's Jail Environmental Impact Report

Dear LA County Chief Exec Office and Board of Supervisors,

I oppose this jail.

Please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

A new LA county jail in Lancaster will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the County of Los Angeles, in extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

--
Rodrigo Heng-Lehtinen

Heng-Lehtinen-1

Please refer to responses to form letter

Rodrigo Heng-Lehtinen (February 6, 2016)

Heng-Lehtinen-1

The commenter opposes the Project. This comment relates to the merits of the proposed Project and not the environmental analysis included in the Draft Environmental Impact Report (EIR) or the environmental impacts of the Project.

Please refer to responses for Form Letter-1 through Form Letter-6 for remaining comments.

Original Message-----

From: Joon Heo [mailto:dukejoon@gmail.com]

Sent: Wednesday, January 06, 2016 6:17 PM

To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental <environmental@ceo.lacounty.gov>; lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov; FifthDistrict@lacbos.org

Subject: Attn: Mira Loma Women’s Jail Environmental Impact Report

Dear LA County Chief Exec Office and Board of Supervisors,

Hi,

Why are we putting people in danger with our tax money? Shouldn't it be the other way around? Why are education budgets so low and we're spending money on things that won't even last? I DON'T UNDERSTAND. (To the people actually making the decision) Do your families know your putting people in danger?

} Heo-1

Please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

A new jail in Lancaster County will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

} Please refer to responses to form letter

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the County of Los Angeles, in extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

} Cont.

--

Joon Heo
dukejoon@gmail.com

Joon Heo (January 6, 2016)

Heo-1

This comment alleges that that the proposed Project would put people in danger and the education budget is so low. This comment relates to the merits of the proposed Project and not the environmental analysis included in the Draft Environmental Impact Report (EIR) or the environmental impacts of the Project.

Please refer to responses for Form Letter-1 through Form Letter-6 for remaining comments.

-----Original Message-----

From: Eunisses hernandez [mailto:Euhernandez@drugpolicy.org]

Sent: Wednesday, January 06, 2016 1:34 PM

To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental <environmental@ceo.lacounty.gov>; lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov; FifthDistrict@lacbos.org

Subject: Attn: Mira Loma Women's Jail Environmental Impact Report

Dear LA County Chief Exec Office and Board of Supervisors,

Hello, My name is Eunisses Hernadnez with the Drug Policy Alliance, and we oppose the building of the New LA County Jail at Mira Loma because there are better and effective alternatives to incarceration that are not being used, such as Law Enforcement Assisted Diversion. LA County has not used split sentencing to its full potential, if used more it can significantly reduce the jail populations. Prop 47 is keeping many folks out of jail and this year there will be substantial funding put into creating and broadening services for those involved with the criminal justice system. By building a new jail you are creating more opportunities for incarceration than successful reentry and the reduction of recidivism.

E. Hernandez-1

Please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

A new jail in Lancaster County will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

Please refer to responses to form letter

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the County of Los Angeles, in extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After

completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

} Cont.

--

Eunisses hernandez
Euhernandez@drugpolicy.org
3470 wilshire blvd
los angeles, Ca 90010

Eunisses Hernandez (January 6, 2016)

E. Hernandez-1

The commenter is with the Drug Policy Alliance and opposes the Project and alleges there are better alternatives to incarceration that are not being used and that can reduce jail populations.

The purpose of and need for the Project is described in detail in Section 3.1, Project Background, of the Draft EIR. That section provides information regarding the County's existing detention facilities, relevant regulatory mandates, and studies analyzing future facility needs, including for housing of female inmates. The proposed jail planning is set in the context of the County's other programmatic and financial support of diversion from incarceration. The County has a concurrent focus on diversion from incarceration as it considers this Project. Therefore, the proposed Project is consistent with the Board of Supervisor's consideration of policy issues addressing alternative approaches to incarceration, such as law enforcement assisted diversion and split sentencing.

Please refer to responses for Form Letter-1 through Form Letter-6 for remaining comments.

-----Original Message-----

From: Marcela Hernandez [mailto:marcelah@theiyc.org]

Sent: Monday, January 11, 2016 12:14 PM

To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental <environmental@ceo.lacounty.gov>; lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov; FifthDistrict@lacbos.org

Subject: Attn: Mira Loma Women’s Jail Environmental Impact Report

Dear LA County Chief Exec Office and Board of Supervisors,

I am opposing this jail plan for the following environmental reasons:

- The site where the jail will be is a “hazardous materials site.” Building it will put those inside the jail in significant danger. } M. Hernandez-1
- People in the jail will be highly susceptible to Valley Fever. Since 2005, thousands of California prisoners contracted the disease, and over 50 have died as a result. Yet, Valley Fever is basically ignored in this report. } M. Hernandez-2
- A new jail in Lancaster will mean more travel, creating more traffic and air pollution. } M. Hernandez-3
- Family visits are crucial for prisoners to maintain strong connections and reduce recidivism. The longer distance makes it harder for family members to visit their loved ones who are locked up. } M. Hernandez-4
- Two underground storage tanks at the site have failed leak detection tests, meaning there could be contamination of soil and groundwater. } M. Hernandez-5
- For people at the jail, there is a high risk of exposure to contaminated soil and ground since 44% of the project site will be “outdoor pervious area.” } M. Hernandez-6
- The Environmental Impact Report must assess alternatives to building the jail. However, the report does not look at alternatives to imprisonment that would make this jail completely unnecessary. } M. Hernandez-7

Please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

A new LA county jail in Lancaster will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been

Please refer to responses to form letter

shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the County of Los Angeles, in extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

Please refer to responses to form letter (cont.)

--

Marcela Hernandez
marcelah@theyc.org
Los Angeles, California
Immigrant Youth Coalition

Marcela Hernandez (January 11, 2016)

M. Hernandez-1

The commenter provides reasons for opposing the jail. Regarding the commenter's concern that the site is a hazardous materials site, Section 4.7, Hazards and Hazardous Materials, of the Draft Environmental Impact Report (EIR) addresses this issue. Also, please refer to the response for Form Letter-3.

M. Hernandez-2

Regarding the comment on Valley Fever, Section 4.2, Air Quality, of the Draft EIR addresses this issue. Also, please refer to the response for Form Letter-5.

M. Hernandez-3

Regarding the concern for increased traffic and air pollution, Section 4.13, Transportation and Traffic, estimates the trip generation of the Project and impacts on the roadway and highway system. Section 4.2, Air Quality, analyzes construction and operational pollutant emissions from the Project. Also, please refer to the response for Form Letter-2.

M. Hernandez-4

The commenter's concern regarding the increase travel distance is addressed in the response for Form Letter-2.

M. Hernandez-5

Regarding the underground storage tanks (USTs), as stated on page 4.7-19 of the Draft EIR, the existing fueling station, which has the USTs, is located outside the Project site boundary, but may be used by the Project. This fueling station has two USTs that previously failed leak detection tests. As shown in the California Environmental Reporting System (CERS) database and the Monitoring System Certification by AW Associates in Appendix E to this Final EIR, the tank permits were updated in 2015 and have passed subsequent leak detection tests and are now in compliance. Soil testing also indicated there is no soil contamination near the USTs (Converse 2016b). MM HAZ-3 requires the testing and repair, as necessary, of the USTs prior to the use of the existing fueling station by the Project.

M. Hernandez-6

Regarding the comment related to the contamination of the soil, please refer to the response for Form Letter-3.

M. Hernandez-7

This comment states the EIR must assess alternatives to the Project, including alternatives to building a jail. Section 5.0, Project Alternatives, of the Draft EIR in fact addresses alternatives in accordance with the California Environmental Quality Act (CEQA, *California Public Resources Code*, Section 21000 et seq.) and the State CEQA Guidelines (14 *California Code of Regulations* [CCR]). The proposed jail planning is also set in the context of the County's other programmatic and financial support of diversion from incarceration. The County has a concurrent focus on diversion from incarceration as it considers this Project. Therefore, the proposed Project is

consistent with the Board of Supervisor's consideration of policy issues addressing alternative approaches to incarceration.

Please refer to responses for Form Letter-1 through Form Letter-6 for remaining comments.

-----Original Message-----

From: Lucas Herzog [mailto:lucasjherzog@gmail.com]

Sent: Wednesday, January 06, 2016 2:36 PM

To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental <environmental@ceo.lacounty.gov>; lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov; FifthDistrict@lacbos.org

Subject: Attn: Mira Loma Women's Jail Environmental Impact Report

Dear LA County Chief Exec Office and Board of Supervisors,

I am a college student living in Santa Clarita, CA. For several years, my grandmother volunteered with an organization that attempts to connect children with their incarcerated parents and family members. Prisons and jails, especially those strategically located far outside of urban areas, such as the proposed Women's Jail in Lancaster, greatly harm the lives of these children by distancing them from their parents both physically and emotionally. This issue is deeply important to me for this reason, in addition to the following given below.

Herzog-1

Please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

A new jail in Lancaster County will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

Please refer to responses to form letter

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the County of Los Angeles, in extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

} Cont.

--

Lucas Herzog
lucasjherzog@gmail.com
CA 91321

Lucas Herzog (January 6, 2016)

Herzog-1

The comment alleges that prisons and jails harm the lives of children by distancing them from parents physically and emotionally. This comment relates to the merits of the proposed Project and not the environmental analysis included in the Draft Environmental Impact Report (EIR) or the environmental impacts of the Project.

Please refer to the response for Form Letter-2 for a discussion of increased travel distances and public transportation. In addition to contact and non-contact visits, the proposed MLWDC will provide video visiting options.

Please refer to responses for Form Letter-1 through Form Letter-6 for remaining comments.

From: Tasha Hill <tashasprings@aol.com>
Sent: Monday, February 08, 2016 8:33 AM
To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental; lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov; FifthDistrict@lacbos.org
Subject: Attn: Mira Loma Women's Jail Environmental Impact Report

Dear LA County Chief Exec Office and Board of Supervisors,

Building a new women's jail won't make our communities safer or better.

} Hill-1

Please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

A new LA county jail in Lancaster will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

} Please refer to responses to form letter

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the County of Los Angeles, in extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

--
Tasha Hill
tashasprings@aol.com

Tasha Hill (February 8, 2016)

Hill-1

The commenter alleges that building the new women's jail will not make our communities safer or better. This comment relates to the merits of the proposed Project and not the environmental analysis included in the Draft Environmental Impact Report (EIR) or the environmental impacts of the Project.

Please refer to responses for Form Letter-1 through Form Letter-6 for remaining comments.

From: Chase Hutchinson <hutchthegreat@gmail.com>
Sent: Friday, February 05, 2016 3:23 PM
To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental; lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov; FifthDistrict@lacbos.org
Subject: Attn: Mira Loma Women's Jail Environmental Impact Report

Dear LA County Chief Exec Office and Board of Supervisors,

I am currently a student at the University of Puget Sound. I live in proximity to the Northwest Detention Center and have seen the negative impact it has on the community. We have been trying to close the facility for a long time now. I urge you to not make a decision that will harm your community for all the reasons listed below and instead choose to promote a better ethical approach towards your community.

Hutchinson-1

Please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

A new LA county jail in Lancaster will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

Please refer to responses to form letter

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the County of Los Angeles, in extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

--
Chase Hutchinson
hutchthegreat@gmail.com
N Alder Street

Tacoma, WA 98416
University of Puget Sound Advocates For Detainees' Voices

Chase Hutchinson (February 5, 2016)

Hutchinson-1

The author identifies himself as a student at the University of Puget Sound who uses that community as an example of what he believes are unspecified negative community impacts from a local detention center. This comment relates to the merits of the proposed Project and not the environmental analysis included in the Draft Environmental Impact Report (EIR) or the environmental impacts of the Project.

Please refer to responses for Form Letter-1 through Form Letter-6 for remaining comments.

Original Message-----

From: Anna Isis-Brown [mailto:a.isisbrown@gmail.com]

Sent: Wednesday, January 06, 2016 1:48 PM

To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental <environmental@ceo.lacounty.gov>; lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov; FifthDistrict@lacbos.org

Subject: Attn: Mira Loma Women’s Jail Environmental Impact Report

Dear LA County Chief Exec Office and Board of Supervisors,

I strongly oppose construction of the new Mira Loma Detention Center Women's Facility in Lancaster, CA, as outlined in the Draft Environmental Impact Report (EIR) released on November 9th.

} Isis-Brown-1

Please consider my public comment on this EIR, as follows:

It is apparent that a new jail in Lancaster will be severely detrimental to the health and well being of L.A. County residents, as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community-based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden (in time, money, and opportunity costs, as well as emotional and physical strain) on families, providers, and prisoners. The burdens on these groups must be considered in the jail proposal. One fundamental reason why these groups' burdens must be considered is that community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel by such people will cause unnecessary increases in air pollution, as well as place a strain on already inadequate public transportation and crumbling road systems used by prisoners, loved ones, jail staff, and construction workers.

The proposed jail location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests. This means that contaminated soil and groundwater may exist at the site. In turn, this means that there may also be a high risk of prisoners being exposed to contaminated soil and ground, since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the County of Los Angeles, in extreme health risk. The plans for water usage and storage, given that thousands of new prisoners and hundreds of employees will be introduced, and a historic drought still continues, are inadequate at mitigating the strain to the environment and current residents. Additionally, the weather and environmental conditions in this area foster a high probability of "Valley Fever", a fungal disease that can result in death. Since 2005, thousands of California prisoners have contracted the disease, and over 50 have died as a result

. However, Valley Fever is essentially ignored in the EIR. If the jail proposal moves forward, during construction local residents would be at increased risk of Valley Fever due to displacement of dry soils. After completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems. Providing adequate healthcare to prisoners sickened with Valley Fever would also increase the cost of the prison.

} Please refer to responses to form letter

This proposed jail is unsafe for L.A. County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

} Cont.

--

Anna Isis-Brown
a.isisbrown@gmail.com
2145 Clinton St.
Los Angeles, CA 90026

Anna Isis-Brown (January 6, 2016)

Isis-Brown-1

The introduction to this comment letter expresses general strong opposition to the proposed project. This comment relates to the merits of the proposed Project and not the environmental analysis included in the Draft Environmental Impact Report (EIR) or the environmental impacts of the Project.

Please refer to responses for Form Letter-1 through Form Letter-6 for remaining comments.

-----Original Message-----

From: sara javed [mailto:sjaved5@yahoo.com]

Sent: Monday, February 29, 2016 6:07 PM

To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental <environmental@ceo.lacounty.gov>; lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov; FifthDistrict@lacbos.org

Subject: Attn: Mira Loma Women's Jail Environmental Impact Report

Dear LA County Chief Exec Office and Board of Supervisors,

Solve the problems and do not lock up people.

Please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

A new LA county jail in Lancaster will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the County of Los Angeles, in extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

--
sara javed

} Javed-1



Please refer to responses to form letter

sjaved5@yahoo.com
3834 tilden ave
culver city, California 90232

Sara Javed (February 29, 2016)

Javed-1

The commenter states that the County should solve the problem and not lock people up. This comment relates to the merits of the proposed Project and not the environmental analysis included in the Draft Environmental Impact Report (EIR) or the environmental impacts of the Project.

Please refer to responses for Form Letter-1 through Form Letter-6 for remaining comments.

-----Original Message-----

From: Ellen Johnson [mailto:ellenjsays@hotmail.com]

Sent: Wednesday, March 02, 2016 8:04 PM

To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental <environmental@ceo.lacounty.gov>; lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov; FifthDistrict@lacbos.org

Subject: Attn: Mira Loma Women's Jail Environmental Impact Report

Dear LA County Chief Exec Office and Board of Supervisors,

I provide support services for inmates in the Placer County Jail. As I am very familiar with the concerns of inmates and their families, including their dependence on public transportation, I am quite concerned about the negative impact this jail could cause.

Johnson-1

Please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

A new LA county jail in Lancaster will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

Please refer to responses to form letter

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the County of Los Angeles, in extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

} Cont.

--

Ellen Johnson
ellenjsays@hotmail.com
2649 6th Ave.
Sacramento, CA 95818-3907
Placer County Public Defender

Ellen Johnson (March 2, 2016)

Johnson-1

The commenter provides support services for inmates at the Placer County jail and expresses concern about the negative impacts of the Project because she is familiar with inmate families' dependence on public transportation. Please refer to the response for Form Letter-2 for a discussion of increased travel distances and public transportation. In addition to contact and non-contact visits, the proposed MLWDC will provide video visiting options, which would avoid the need for travel.

Please refer to responses for Form Letter-1 through Form Letter-6 for remaining comments.

-----Original Message-----

From: Anjuli Kronheim Katz [mailto:akronhe1@gmail.com]

Sent: Wednesday, January 06, 2016 3:29 PM

To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental <environmental@ceo.lacounty.gov>; lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov; FifthDistrict@lacbos.org

Subject: Attn: Mira Loma Women's Jail Environmental Impact Report

Dear LA County Chief Exec Office and Board of Supervisors,

We should be putting more resources towards education and away from a new jail.

Please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

A new jail in Lancaster County will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the County of Los Angeles, in extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

--

} Katz-1



Please refer to responses to form letter

Anjuli Kronheim Katz
akronhe1@gmail.com
1319 Berkeley St
Santa Monica, California 90404

Anjuli Kronheim Katz (January 6, 2016)

Katz -1

The author's introductory comment indicates support for more resources to education and away from a new jail. The project goal incorporates a priority for appropriate educational programs to reduce recidivism of the female inmates.

This comment relates to the merits of the proposed Project and not the environmental analysis included in the Draft EIR or the environmental impacts of the Project.

Please refer to responses for Form Letter-1 through Form Letter-6 for remaining comments.

-----Original Message-----

From: T'Keyah Crystal Keymah [mailto:info@tkeyah.com]

Sent: Tuesday, March 01, 2016 6:53 AM

To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental <environmental@ceo.lacounty.gov>; lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov; FifthDistrict@lacbos.org

Subject: Attn: Mira Loma Women's Jail Environmental Impact Report

Dear LA County Chief Exec Office and Board of Supervisors,

During the last election, I moderated a candidates' forum for the office of L.A. County Sheriff. In my research preparing for the debate, I learned many things about the state of our jail system that I wish were not true. It is my firm belief, that the lives of people who for whatever reason, find themselves at the mercy of our justice system, matter for less than the money that can be made from their detainment and incarceration. This system has more than shown itself to be a detriment to our collective community in the form of broken families and the resulting increase in crime, increased recidivism, decrease in health and welfare of the incarcerated and their families, and the decreased value of the neighborhoods from which these women come. Despite clear evidence of this, it seems that the wealth of the few that profit from this ugly system is simply more important. We must, as a community, turn the tide on this wave of profit over lives. We must consider the lives of the women, in this case, that will be damaged or even ended, instead of being rehabilitated, by the addition of this new jail.

Keymah-1

Please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

A new LA county jail in Lancaster will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

Please refer to responses to form letter

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the County of Los Angeles, in extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current

residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

} Cont.

--
T'Keyah Crystal Keymah
info@tkeyah.com
10061 Riverside Dr. #714
Toluca Lake, CA 91602

T'Keyah Crystal Keymah (March 1, 2016)

Keymah-1

The comment relates to the experience and belief of the commenter that inmates matter less than the money made from their incarceration; that jails result in broken families, increased crime, increased recidivism, decreased health and welfare; and decreased value of the neighborhoods; and that the profit from the jail system is more important. She asks that we consider the lives of women that would be damaged by the addition of the new jail.

This comment relates to the jail system in general and does not address the proposed Project, the environmental analysis included in the Draft Environmental Impact Report (EIR), or the environmental impacts of the Project. The Los Angeles County owns the proposed Project site and the Sheriff's Department, which would operate the proposed MLWDC, would not make a profit on the facility.

Please refer to responses for Form Letter-1 through Form Letter-6 for remaining comments.

-----Original Message-----

From: Ellen Khansefid [mailto:Ellenkhansefid@gmail.com]

Sent: Wednesday, March 02, 2016 10:38 AM

To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental <environmental@ceo.lacounty.gov>; lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov; FifthDistrict@lacbos.org

Subject: Attn: Mira Loma Women's Jail Environmental Impact Report

Dear LA County Chief Exec Office and Board of Supervisors,

No more jails!!!

Please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

A new LA county jail in Lancaster will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the County of Los Angeles, in extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

--

Ellen Khansefid
Ellenkhansefid@gmail.com

} Khansefid-1



Please refer to responses to form letter

Ellen Khansefid (March 2, 2016)

Khansefid-1

The commenter does not want more jails. This comment relates to the merits of the proposed Project, and not the environmental analysis included in the Draft Environmental Impact Report (EIR) or the environmental impacts of the Project.

Please refer to responses for Form Letter-1 through Form Letter-6 for remaining comments.

-----Original Message-----

From: Eric Kittendorff [mailto:ericalyssa26@gmail.com]

Sent: Wednesday, January 06, 2016 11:37 PM

To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental <environmental@ceo.lacounty.gov>; lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov; FifthDistrict@lacbos.org

Subject: Attn: Mira Loma Women's Jail Environmental Impact Report

Dear LA County Chief Exec Office and Board of Supervisors,

I think we need more behavior modification programs, maybe schools that teach morals, and ethics, and values, and teach people how to love themselves, and how to create wonderful lives for themselves by helping each other...jails don't solve these issues. I've personally been thru a behavior modification program and it's completely changed my life. Love cures all...not jails!

} Kittendorff-1

Please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

A new jail in Lancaster County will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

} Please refer to responses to form letter

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the County of Los Angeles, in extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

--

Eric Kittendorff
ericalyssa26@gmail.com
517 San Julian St.
Los Angeles, California 90013

Eric Kittendorff (January 6, 2016)

Kittendorff-1

This commenter wants more behavior modification programs and not jails. This comment relates to the merits of the proposed Project and not the environmental analysis included in the Draft Environmental Impact Report (EIR) or the environmental impacts of the Project.

Please refer to responses for Form Letter-1 through Form Letter-6 for remaining comments.

-----Original Message-----

From: Anastasia Krylov [mailto:anastasiakrylov@gmail.com]

Sent: Thursday, January 07, 2016 10:17 AM

To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental <environmental@ceo.lacounty.gov>; lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov; FifthDistrict@lacbos.org

Subject: Attn: Mira Loma Women's Jail Environmental Impact Report

Dear LA County Chief Exec Office and Board of Supervisors,

The United States leads the world in number of incarcerated people, most of them non-violent drug offenders. For-profit prisons have commodified our citizens and brought back a new form of slavery. I oppose prisons, and support schools.

} Krylov-1

Please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

A new jail in Lancaster County will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

} Please refer to responses to form letter

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the County of Los Angeles, in extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

--

Anastasia Krylov

Anastasia Krylov (January 7, 2016)

Krylov-1

This comment alleges that for profit prisons have introduced a "new form of slavery" and that the author opposes prisons and supports schools. After noting that the Environmental Impact Report (EIR) relates to a public local jail and not a private for profit prison, this comment relates to the merits of the proposed Project and not the environmental analysis included in the Draft EIR or the environmental impacts of the Project.

Please refer to responses for Form Letter-1 through Form Letter-6 for remaining comments.

From: Nancy White Kuykendall <donotreply@wordpress.com>
Sent: Thursday, February 25, 2016 5:54 PM
To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental; lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov; FifthDistrict@lacbos.org
Subject: Attn: Mira Loma Women's Jail, Environmental Impact Report

Name: Nancy White Kuykendall

Email: nwkuykendall@gmail.com

Address: 72 Vandalia Ave

City: Asheville

State: North Carolina

Zip Code: 28806

Comment (please personalize): Dear LA County Chief Exec Office and Board of Supervisors,

~ I worked in adult education at a jail. Jails are basically warehouses for the poor. No vocational rehab, no decent books to read....just stupid punishment which makes humans even more embittered. We can do better. Stop building these warehouses, reduce incarceration period.

} Kuykendall-1

Please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

A new LA county jail in Lancaster will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

} Please refer to responses to form letter

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the County of Los Angeles, in extreme health risk. Plans for water usage and

storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

Cont.

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

Time: February 26, 2016 at 1:53 am

IP Address: 97.95.255.85

Contact Form URL: <http://lanomorejails.org/2016/01/05/urgent-submit-comment-now-against-proposed-new-la-county-jail/>

Sent by an unverified visitor to your site.

Nancy White Kuykendall (February 25, 2016)

Kuykendall-1

The commenter alleges that jails are warehouses for the economically disadvantaged, with no vocational rehabilitation or decent books. She states that jails make humans embittered and we should stop building these warehouses. 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 has a concurrent focus on diversion from incarceration as it considers this Project. Therefore, the proposed Project is consistent with the Board of Supervisor's consideration of policy issues addressing alternative approaches to incarceration.

Please refer to responses for Form Letter-1 through Form Letter-6 for remaining comments.

-----Original Message-----

From: Molly Larkey [mailto:mollylarkey@gmail.com]

Sent: Thursday, January 07, 2016 3:59 PM

To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental <environmental@ceo.lacounty.gov>; lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov; FifthDistrict@lacbos.org

Subject: Attn: Mira Loma Women's Jail Environmental Impact Report

Dear LA County Chief Exec Office and Board of Supervisors,

I am a Los Angeles resident and I am opposed to the construction of the new jail for the following reasons.

} Larkey-1

Please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

A new LA county jail in Lancaster will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

} Please refer to responses to form letter

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the County of Los Angeles, in extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

--

Molly Larkey
mollylarkey@gmail.com
5337 Abbott Place
Los Angeles, California 90042

Molly Larkey (January 7, 2016)

Larkey-1

The commenter opposes the construction of a new jail. This comment relates to the merits of the proposed Project and not the environmental analysis included in the Draft Environmental Impact Report (EIR) or the environmental impacts of the Project.

Please refer to responses for Form Letter-1 through Form Letter-6 for remaining comments.

-----Original Message-----

From: Colby Lenz [mailto:thecolbyproject@gmail.com]

Sent: Wednesday, January 06, 2016 4:58 PM

To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental <environmental@ceo.lacounty.gov>; lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov; FifthDistrict@lacbos.org

Subject: Attn: Mira Loma Women's Jail Environmental Impact Report

Dear LA County Chief Exec Office and Board of Supervisors,

To Whom It May Concern,

I am writing to express some of my concerns about the proposed Lancaster jail and my strong opposition to this plan.

Please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

A new jail in Lancaster County will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the County of Los Angeles, in extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

} Lenz-1

} Please refer to responses to form letter

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

} Cont.

--

Colby Lenz
thecolbyproject@gmail.com
2301 Glendale Blvd. #6
Los Angeles, California 90039

Colby Lenz (January 6, 2016)

Lenz-1

This commenter's introductory comment indicates that he wants to express strong opposition to the proposed project.

Please refer to responses for Form Letter-1 through Form Letter-6 for remaining comments.

-----Original Message-----

From: Adelle Lutz [mailto:adelle@mac.com]

Sent: Wednesday, January 06, 2016 1:07 PM

To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental <environmental@ceo.lacounty.gov>; lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov; FifthDistrict@lacbos.org

Subject: Attn: Mira Loma Women's Jail Environmental Impact Report

Dear LA County Chief Exec Office and Board of Supervisors,

YOU'RE BUILDING A JAIL ON A HAZARDOUS WASTE SITE?! ARE YOU NUTS?!

} Lutz-1

Please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

A new jail in Lancaster County will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

} Please refer to responses to form letter

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the County of Los Angeles, in extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

--
Adelle Lutz

adellel@mac.com
7964 Willow Glen Rd
Los Angeles, CA 90046

Adelle Lutz (January 6, 2016)

Lutz-1

The commenter alleges that the Project is being built on a hazardous waste site. The Project site was never operated as a site that accepted hazardous wastes for disposal. Hazardous materials and wastes are addressed in Section 4.7, Hazards and Hazardous Materials, of the Draft Environmental Impact Report (EIR) as reviewed in the referenced response to your comment, which is marked as Form Letter-3 in the Form Letter above.

Please refer to responses for Form Letter-1 through Form Letter-6 for remaining comments.

Original Message-----

From: Joseph Maizlish [mailto:jmaizlish@igc.org]

Sent: Wednesday, January 06, 2016 5:08 PM

To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental <environmental@ceo.lacounty.gov>; lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov; FifthDistrict@lacbos.org

Subject: Attn: Mira Loma Women’s Jail Environmental Impact Report

Dear LA County Chief Exec Office and Board of Supervisors,

Taking women out of their communities is even more harmful than taking men out, so it's important that this be done only if no alternative solutions to whatever hazard to communities some of them may pose.

Even under current laws and arrest policies (which have their own problems!), women are highly likely to be adequately dealt with from the public safety point of view by non-incarceration programs, services, and if necessary, restrictions.

Such alternatives have been very poorly developed and funded by L.A. County and California, though that situation is slowly changing. Pouring more scarce state and county funds into construction and operation of the distant jail will, from the financial and political point of view, make the expansion of those creative improvements in public safety and social policy all the more difficult.

Building the jail before major reductions in jailing and major reforms basing sentencing on sophisticated assessment systems and use of non-incarceration alternatives is an unnecessary burden on physical environmental factors and a damaging step from the social, budgetary, and public safety points of view.

Maizlish-1

Please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

A new jail in Lancaster County will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

Please refer to responses to form letter

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the County of Los Angeles, in extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well

as hundreds of employees are inadequate at mitigating the strain to the environment and current residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

} Cont.

--
Joseph Maizlish
jmaizlish@igc.org
2436 Armstrong Ave.
Los Angeles, California 90039

Joseph Maizlish (January 6, 2016)

Maizlish-1

The commenter states that taking women out of their communities is more harmful than taking men out and should only be done if there are no alternative solutions, such as non-incarceration programs, services, and restrictions. He also states that using funds for jails makes creative improvements in public safety and social policy more difficult.

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 has a concurrent focus on diversion from incarceration as it considers this Project. Therefore, the proposed Project is consistent with the Board of Supervisor's consideration of policy issues addressing alternative approaches to incarceration, as mentioned in the comment.

Please refer to responses for Form Letter-1 through Form Letter-6 for remaining comments.

-----Original Message-----

From: Denise Marshall [mailto:denisemarshall36@outlook.com]

Sent: Saturday, January 09, 2016 9:03 AM

To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental <environmental@ceo.lacounty.gov>; lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov; FifthDistrict@lacbos.org

Subject: Attn: Mira Loma Women's Jail Environmental Impact Report

Dear LA County Chief Exec Office and Board of Supervisors,

My name is Denise Marshall and I am a student at UCLA. I believe that the concept of building more jails adds to the incentive to fill them by altering current policies, to further promote the unjust policing and detention people from marginalized backgrounds.

} Marshall-1

Please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

A new LA county jail in Lancaster will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

} Please refer to responses to form letter

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the County of Los Angeles, in extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

--

Denise Marshall
denisemarshall36@outlook.com
3320 Sawtelle Blvd Apt. 105
Los Angeles, California 90066

Denise Marshall (January 9, 2016)

Marshall-1

The commenter is a student at UCLA and alleges that building more jails is an incentive to fill them and promotes unjust policing and detention. This comment relates to the merits of the proposed Project and not the environmental analysis included in the Draft Environmental Impact Report (EIR) or the environmental impacts of the Project.

Please refer to responses for Form Letter-1 through Form Letter-6 for remaining comments.

-----Original Message-----

From: Richard Martinez [mailto:rimartinez@hotmail.com]

Sent: Friday, February 05, 2016 9:43 PM

To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental <environmental@ceo.lacounty.gov>; lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov; FifthDistrict@lacbos.org

Subject: Attn: Mira Loma Women’s Jail Environmental Impact Report

Dear LA County Chief Exec Office and Board of Supervisors,

Dear Sir or Madam,

I have been advocating for an alternative approach to our justice system, one which doesn't see incarceration as the only solution. While I have many other thoughts regarding our criminal justice system as a whole, I believe there is a better way forward, and it shouldn't include spending hundreds of millions of taxpayer money to incarcerate people. I challenge your office to think of more creative ways to use these moneys, there are ALWAYS alternatives, its simply a matter of seeking a change.

} Martinez-1

In addition, please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

A new LA county jail in Lancaster will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

} Please refer to responses to form letter

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the County of Los Angeles, in extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

} Cont.

Thank you,
Richard

--
Richard Martinez
rimartinez@hotmail.com
9503 Rives Ave
Downey, CA 90240

Richard Martinez (February 5, 2016)

Martinez-1

The commenter wants an alternative approach to the justice system; that taxpayer money should not be used to incarcerate people; and there are alternatives to the use of the money. 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 has a concurrent focus on diversion from incarceration as it considers this Project. Therefore, the proposed Project is consistent with the Board of Supervisor's consideration of policy issues addressing alternative approaches to incarceration.

Please refer to responses for Form Letter-1 through Form Letter-6 for remaining comments.

-----Original Message-----

From: JamesEric McGee [mailto:jamesericmcgee@hotmail.com]

Sent: Wednesday, January 06, 2016 3:44 PM

To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental <environmental@ceo.lacounty.gov>; lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov; FifthDistrict@lacbos.org

Subject: Attn: Mira Loma Women's Jail Environmental Impact Report

Dear LA County Chief Exec Office and Board of Supervisors,

Reform the administration of justice, and you won't need new jails.

Please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

A new jail in Lancaster County will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the County of Los Angeles, in extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

--

} McGee-1

} Please refer to responses to form letter

JamesEric McGee
jamesericmcgee@hotmail.com
Buena Park, California 90621

James Eric McGee (January 6, 2016)

McGee-1

The commenter wants the administration of justice reformed to eliminate the need for new jails. This comment relates to the merits of the proposed Project and not the environmental analysis included in the Draft Environmental Impact Report (EIR) or the environmental impacts of the Project.

Please refer to responses for Form Letter-1 through Form Letter-6 for remaining comments.

From: Kristina Meshelski <kmeshelski@gmail.com>
Sent: Saturday, February 13, 2016 10:20 PM
To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental; lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov; FifthDistrict@lacbos.org
Subject: Attn: Mira Loma Women's Jail Environmental Impact Report

Dear LA County Chief Exec Office and Board of Supervisors,

I oppose the building of a new jail in Lancaster.

Please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

A new LA county jail in Lancaster will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the County of Los Angeles, in extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

--
Kristina Meshelski
kmeshelski@gmail.com
1926 Vista Del Mar Apt 4
Los Angeles, CA 90068

} Meshelski-1

} Please refer to responses to form letter

Kristina Meshelski (February 13, 2016)

Meshelski-1

The commenter opposes the new jail. This comment relates to the merits of the proposed Project and not the environmental analysis included in the Draft Environmental Impact Report (EIR) or the environmental impacts of the Project.

Please refer to responses for Form Letter-1 through Form Letter-6 for remaining comments.

-----Original Message-----

From: Janet Messana [mailto:Janetmessana@yahoo.com]

Sent: Thursday, January 07, 2016 12:52 AM

To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental <environmental@ceo.lacounty.gov>; lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov; FifthDistrict@lacbos.org

Subject: Attn: Mira Loma Women's Jail Environmental Impact Report

Dear LA County Chief Exec Office and Board of Supervisors,

At this point in our history concerning prisons - we know it is not working to deter crime in our country. The funds to build this new jail should be used for programs to help reduce the amount of people going into jail. Also, the land the jail is to be built on has serious issues with contamination of the soil and underground water - this will lead to more money being spent when there are health problems with the prisoners and the surrounding community.

} Messana-1

Please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

A new jail in Lancaster County will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

} Please refer to responses to form letter

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the County of Los Angeles, in extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

} Cont.

--

Janet Messana
Janetmessana@yahoo.com
90036

Janet Messana (January 7, 2016)

Messana-1

The commenter alleges that prisons are not deterring crime and funds should be used for programs to reduce jail populations. The purpose of and need for the Project is described in detail in Section 3.1, Project Background, of the Draft EIR. That section provides information regarding the County's existing detention facilities, relevant regulatory mandates, and studies analyzing future facility needs, including for housing of female inmates. The proposed jail planning is set in the context of the County's other programmatic and financial support of diversion from incarceration. The County has a concurrent focus on diversion from incarceration as it considers this Project. Therefore, the proposed Project is consistent with the Board of Supervisor's consideration of policy issues addressing alternative approaches to incarceration.

Regarding the comment related to the contamination of the soil and groundwater, please refer to the response for Form Letter-3 for a discussion of this issue.

Please refer to responses for Form Letter-1 through Form Letter-6 for remaining comments.

-----Original Message-----

From: Oskar Mosco [mailto:Oskar415@gmail.com]

Sent: Friday, January 08, 2016 8:13 AM

To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental <environmental@ceo.lacounty.gov>; lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov; FifthDistrict@lacbos.org

Subject: Attn: Mira Loma Women's Jail Environmental Impact Report

Dear LA County Chief Exec Office and Board of Supervisors,

Hello,

The proposal for a new LA jail is short-sighted and I oppose it on all accounts.

Please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

A new LA county jail in Lancaster will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the County of Los Angeles, in extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

} Mosco-1

} Please refer to responses to form letter

--

Oskar Mosco
Oskar415@gmail.com
1515 Alice St.
Oakland, California 94612

Oskar Mosco (January 8, 2016)

Mosco-1

The commenter opposes the proposal for a new jail and considers it short-sighted. 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 has a concurrent focus on diversion from incarceration as it considers this Project. Therefore, the proposed Project is consistent with the Board of Supervisor's consideration of policy issues addressing alternative approaches to incarceration.

Please refer to responses for Form Letter-1 through Form Letter-6 for remaining comments.

-----Original Message-----

From: Lydia Glenn-Murray [mailto:lydiakgm@gmail.com]

Sent: Thursday, January 28, 2016 12:26 AM

To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental <environmental@ceo.lacounty.gov>; lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov; FifthDistrict@lacbos.org

Subject: Attn: Mira Loma Women's Jail Environmental Impact Report

Dear LA County Chief Exec Office and Board of Supervisors,

The prison industrial complex is hurting our society!!

Please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

A new LA county jail in Lancaster will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the County of Los Angeles, in extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

--
Lydia Glenn-Murray
lydiakgm@gmail.com

} Murray-1



Please refer to responses to form letter

Lydia Murray (January 28, 2016)

Murray-1

This comment alleges that the prison industrial complex is hurting our society. This comment relates to the merits of proposed Project and not the environmental analysis included in the Draft Environmental Impact Report (EIR) or the environmental impacts of the Project.

Please refer to responses for Form Letter-1 through Form Letter-6 for remaining comments.

-----Original Message-----

From: Ari Negovschi [mailto:anegovschi@gmail.com]

Sent: Friday, January 15, 2016 8:55 AM

To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental <environmental@ceo.lacounty.gov>; lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov; FifthDistrict@lacbos.org

Subject: Attn: Mira Loma Women’s Jail Environmental Impact Report

Dear LA County Chief Exec Office and Board of Supervisors,

Please consider investing the 2 billion dollars into community solutions. As a non-profit worker that works on government funded projects (particularly to enhance education in communities most harshly affected by the lack of adequate funding for education, parks and recreation center programming, and economic infrastructure, among other things), I know that the creation of jails is not a viable solution. It will not help to empower communities, it will only destroy communities. In considering this plan, please be mindful that LA County will not only spend 2 billion dollars on this one jail - this vote on spending is a will be a part of a harmful legacy of cyclical spending on jails in order to avoid real solutions to put an end to real issues facing our community of LA County residents. This harmful legacy will not stop until legislators and elected officials decide to make it stop by listening to the constituents they represent.

} Negovschi-1

Please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

A new LA county jail in Lancaster will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

} Please refer to responses to form letter

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the County of Los Angeles, in extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After

completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

} Cont.

--
Ari Negovschi
anegovschi@gmail.com
Santa Clarita

Ari Negovschi (January 15, 2016)

Negovschi -1

The author identifies himself as a non-profit community worker in education who advocates spending \$2 Billion for community solutions and not for a jail. The estimated budget for the renovation of the proposed project is not \$2 billion but is approximately \$123.4 million, and the costs are broken down into Assembly Bill (AB) 900 Grant Contribution, net County cost, and other funding sources. These preliminary costs include the costs associated with the mitigation measures included in the Final EIR. An updated total Project cost estimate will be prepared for the Board of Supervisors for their consideration at the time the Final EIR and the proposed Project recommendations are presented to them for consideration. The 2015 document can be viewed at the following website: <http://file.lacounty.gov/bos/supdocs/94070.pdf>.

This comment relates to the merits of the proposed Project and not the environmental analysis included in the Draft EIR or the environmental impacts of the Project.

Please refer to responses for Form Letter-1 through Form Letter-6 for remaining comments.

-----Original Message-----

From: albertine nicholls [mailto:albertinelosangeles@yahoo.com]

Sent: Thursday, January 07, 2016 10:24 AM

To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental <environmental@ceo.lacounty.gov>; lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov; FifthDistrict@lacbos.org

Subject: Attn: Mira Loma Women's Jail Environmental Impact Report

Dear LA County Chief Exec Office and Board of Supervisors,

No more jails!

Please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

A new jail in Lancaster County will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the County of Los Angeles, in extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

--
albertine nicholls

} Nicholls-1

} Please refer to responses to form letter

albertinelosangeles@yahoo.com
3227 bennett drive
los angeles, CALIFORNIA 90068

Albertine Nicholls (January 6, 2016)

Nicholls-1

The commenter does not want more jails. This comment relates to the merits of the proposed Project, and not the environmental analysis included in the Draft Environmental Impact Report (EIR) or the environmental impacts of the Project.

Please refer to responses for Form Letter-1 through Form Letter-6 for remaining comments.

From: Patricia Ornelas-Moya <20omoya01@gmail.com>
Sent: Monday, February 08, 2016 6:15 PM
To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental; lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov; FifthDistrict@lacbos.org
Subject: Attn: Mira Loma Women's Jail Environmental Impact Report

Dear LA County Chief Exec Office and Board of Supervisors,

I am an abolitionist, community organizer and against the building of any prison. I feel we need to envision another world without the police and the jail system.

} Ornelas-Moya-1

Please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

A new LA county jail in Lancaster will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

} Please refer to responses to form letter

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the County of Los Angeles, in extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

--
Patricia Ornelas-Moya
20omoya01@gmail.com
14211 Oval Dr.
Whittier, CA 90604
Community Education for Social Action (CESA)

Patricia Ornelas-Moya (February 8, 2016)

Ornelas-Moya-1

The introductory comment relates to the commenter's described vision for a world without the police and the jail system. This comment relates to the merits of the proposed Project and not the environmental analysis included in the Draft Environmental Impact Report (EIR) or the environmental impacts of the Project.

Please refer to responses for Form Letter-1 through Form Letter-6 for remaining comments.

-----Original Message-----

From: Elizabeth Pan [mailto:elizabethpan@gmail.com]

Sent: Wednesday, January 06, 2016 1:54 PM

To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental <environmental@ceo.lacounty.gov>; lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov; FifthDistrict@lacbos.org

Subject: Attn: Mira Loma Women's Jail Environmental Impact Report

Dear LA County Chief Exec Office and Board of Supervisors,

Jails of any form are not only detrimental to the environment but to people's lives and society at large. Please let's not cause more damage to ourselves by building more unnecessary cages for human life.

} Pan-1

Please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

A new jail in Lancaster County will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

} Please refer to responses to form letter

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the County of Los Angeles, in extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

--

Elizabeth Pan
elizabethpan@gmail.com
1138 CARDIFF AVE APT 6
LOS ANGELES, CA 90035

Elizabeth Pan (January 6, 2016)

Pan-1

The comment alleges that the jails are detrimental to the environment, people's lives, and society at large, and as such, we should not build more unnecessary cages for human life. This comment relates to the merits of the proposed Project and not the environmental analysis included in the Draft Environmental Impact Report (EIR) or the environmental impacts of the Project.

Please refer to responses for Form Letter-1 through Form Letter-6 for remaining comments.

Original Message-----

From: Willie Patterson [mailto:wpatterson2001@yahoo.com]

Sent: Wednesday, January 06, 2016 3:06 PM

To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental <environmental@ceo.lacounty.gov>; lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov; FifthDistrict@lacbos.org

Subject: Attn: Mira Loma Women's Jail Environmental Impact Report

Dear LA County Chief Exec Office and Board of Supervisors,

Re-institute the practice to rehabilitate inmates. The current practice creates more of a problem for the communities.

} Patterson-1

Please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

A new jail in Lancaster County will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

} Please refer to responses to form letter

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the County of Los Angeles, in extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

--

Willie Patterson
wpatterson2001@yahoo.com
2523 Marengo Avenue
Altadena, California 91001-2225

Willie Patterson (January 6, 2016)

Patterson-1

The commenter asks that inmate rehabilitation be reinstated because the current practice creates more of a problem. The proposed jail planning is set in the context of the County's other programmatic and financial support of diversion from incarceration. The County has a concurrent focus on diversion from incarceration as it considers this Project. Therefore, the proposed Project is consistent with the Board of Supervisor's consideration of policy issues addressing alternative approaches to incarceration

Please refer to responses for Form Letter-1 through Form Letter-6 for remaining comments.

Original Message-----

From: ada rajkovic [mailto:adarajkovic@alum.calarts.edu]

Sent: Tuesday, March 01, 2016 8:23 PM

To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental <environmental@ceo.lacounty.gov>; lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov; FifthDistrict@lacbos.org

Subject: Attn: Mira Loma Women's Jail Environmental Impact Report

Dear LA County Chief Exec Office and Board of Supervisors,

I am writing for you to reconsider building this jail because I feel that it disables our communities and further perpetuates the problems of racism and poverty. Money should instead go into actually rehabilitation programs that can serve as alternatives to jails and can empower people to do better instead of continue the violent, corrupt and dysfunctional jail system.

} Rajkovic-1

Please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

A new LA county jail in Lancaster will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

} Please refer to responses to form letter

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the County of Los Angeles, in extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

--

ada rajkovic
adarajkovic@alum.calarts.edu
4308 burns avenue
los angeles, CA 90029
sunday los angeles

Ada Rajkovic (March 1, 2016)

Rajkovic-1

The commenter indicates her view that "rehabilitation programs" should be an alternative which would replace jails, which are alleged to perpetuate racism and poverty. The County's proposal is to have both a more normative jail environment as described for the renovated women's detention center and other rehabilitative options as alternatives to incarceration. Please refer to the response for Form Letter-1 for a discussion of County actions related to alternatives to incarceration.

Please refer to responses for Form Letter-1 through Form Letter-6 for remaining comments.

Original Message-----

From: Danielle Rigney [mailto:Daniellerigney@yahoo.com]

Sent: Tuesday, January 12, 2016 12:50 PM

To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental <environmental@ceo.lacounty.gov>; lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov; FifthDistrict@lacbos.org

Subject: Attn: Mira Loma Women's Jail Environmental Impact Report

Dear LA County Chief Exec Office and Board of Supervisors,

My son has been in prison for 5 years thus far. Since his incarceration he has learned in prison, to be a hateful racist. Prison has served to create a young man full of hate. When he is released he will have received NO training or social skills. He has repeatedly asked for such. The CDCR has almost guaranteed his failure.

Incarceration is not the answer, rehabilitation through counseling, classes and social support is.

Please don't be a part of the problem. CDCR has ruined my son's life and as a result, my life.

Please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

A new LA county jail in Lancaster will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the County of Los Angeles, in extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After

Rigney-1

Please refer to responses to form letter

completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

} Cont.

--

Danielle Rigney
Daniellerigney@yahoo.com
Po box 4238
Auburn, Ca 95604
Private citizen

Danielle Rigney (January 12, 2016)

Rigney-1

The commenter talks about her son who is in a state prison and how incarceration has affected him; how he has asked for training but has not received any; and how the CDCR has ruined his life. The commenter is also opposed to incarceration and prefers counselling, classes, and social support.

Thank you for your comment generally sharing your family's experience. This comment relates to the merits of the proposed Project and not the environmental analysis included in the Draft Environmental Impact Report (EIR) or the environmental impacts of the Project.

Please refer to responses for Form Letter-1 through Form Letter-6 for remaining comments.

-----Original Message-----

From: Anayeli Rivas [mailto:ar.anayelirivas@gmail.com]

Sent: Wednesday, January 06, 2016 5:37 PM

To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental <environmental@ceo.lacounty.gov>; lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov; FifthDistrict@lacbos.org

Subject: Attn: Mira Loma Women's Jail Environmental Impact Report

Dear LA County Chief Exec Office and Board of Supervisors,

My name is Anayeli Rivas and I oppose the construction of this women's jail because it is an attack on the health of the residents in Lancaster. It is also a band-aid solution to women's violence and it perpetuates the school-to-prison pipeline.

} Rivas-1

Please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

A new jail in Lancaster County will be severely detrimental to the health and well-being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community-based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

} Please refer to responses to form letter

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the County of Los Angeles, in extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners, as well as hundreds of employees, are inadequate at mitigating the strain to the environment and current residents. Additionally, the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

--

Anayeli Rivas
ar.anayelirivas@gmail.com
Los Angeles , California

Anayeli Rivas (January 6, 2016)

Rivas-1

This comment introduction alleges that the proposed Project is an attack on the health of the residents of Lancaster, as well as indicating opposition to a "school to prison pipeline". The Draft Environmental Impact Report (EIR) for the proposed Project has been prepared in accordance with the California Environmental Quality Act (CEQA, *California Public Resources Code*, Sections 21000 et seq.) and the State CEQA Guidelines (14 *California Code of Regulations* [CCR]), and addresses the potential direct, indirect, and cumulative impacts of the Project on all environmental issue areas.

Please refer to responses for Form Letter-1 through Form Letter-6 for remaining comments.

-----Original Message-----

From: Peter Joseph Rosenwald [mailto:donotreply@wordpress.com]

Sent: Tuesday, January 12, 2016 10:28 PM

To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental <environmental@ceo.lacounty.gov>; lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov; FifthDistrict@lacbos.org

Subject: Attn: Mira Loma Women's Jail, Environmental Impact Report

Name: Peter Joseph Rosenwald

Email: sunkistpete@yahoo.com

Address:

City:

State:

Zip Code: 90740

Comment (please personalize): Dear LA County Chief Exec Office and Board of Supervisors,

~ Insert brief introductory message why you oppose jail ~

The origin of this increase in jail capacity goes back several years to its undemocratic State bond funding mechanism. Assembly Bill 900 was designated by the then Governor Arnold Schwarzenegger as "Emergency Legislation." This meant that there would be no vetting or discussion of the bill. Legislators were not even given an opportunity to read the legislation; they were only able to note on the measure. There was no concurrent discussion about modernizing sentencing laws, or parole regulations. While AB900 allowed for some rehabilitation programs, these were not possible in State Prisons, because recreation and education space was used to mitigate overcrowding by converting these spaces to dormitories. The environmental considerations above are reason enough not to invest in new jails, rather they are trumped by the fact that these monies could be invested in diversion and rehabilitation programs. This is an

Rosenwald-1

opportunity to allow for forward-thinking, progressive assistance to our broken, dysfunctional correctional system in California. My name is Peter Joseph Rosenwald.

I'm a member of: Temple Israel of Long Beach; I received: The Leon Shirley Award for Grassroots Community Activism from FACTS (Families to Amend California's Three Strikes) in 2012; In December, 2015 I received a "Peacemaker of the Year Award: Lifetime of Service Award for Peace and Justice" from The Long Beach Area Peace Network; From my professional career as a Community Librarian working for the County of Los Angeles Public Library, I was given "The Golden Apple" award by the Northwest San Gabriel Region of the California School Administrator's Association.

Rosenwald-2

My library science training was based on a fellowship to obtain a Master of Science in Library Science degree with a specialization in Health Sciences Librarianship, and, Library Services for Disabled and Institutionalized people from Wayne State University

in Detroit. I believe that my background, education, and experience make me qualified to comment on Los Angeles County's jail expansion program.

Please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

Please refer to responses to form letter

A new LA county jail in Lancaster will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the

negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the County of Los Angeles, in extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

Please refer to responses to form letter (cont.)

Time: January 13, 2016 at 6:27 am

IP Address: 100.9.189.240

Contact Form URL: <http://lanomorejails.org/2016/01/05/urgent-submit-comment-now-against-proposed-new-la-county-jail/>

Sent by an unverified visitor to your site.

Peter Rosenwald (January 12, 2016)

Rosenwald-1

The comment discusses Assembly Bill (AB) 900 and indicates it is a reason not to invest in jails and to use monies for diversion and rehabilitation programs. The proposed jail planning is set in the context of the County's other programmatic and financial support of diversion from incarceration. The County has a concurrent focus on diversion from incarceration as it considers this Project. Therefore, the proposed Project is consistent with the Board of Supervisor's consideration of policy issues addressing alternative approaches to incarceration.

Rosenwald-2

This comment relates to the commenter's qualifications and does not address the proposed Project, the environmental analysis included in the Draft EIR, or the environmental impacts of the Project.

Please refer to responses for Form Letter-1 through Form Letter-6 for remaining comments.

-----Original Message-----

From: Laurie Schick [mailto:mojosafari@yahoo.com]

Sent: Monday, February 29, 2016 1:47 PM

To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental <environmental@ceo.lacounty.gov>; lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov; FifthDistrict@lacbos.org

Subject: Attn: Mira Loma Women's Jail Environmental Impact Report

Dear LA County Chief Exec Office and Board of Supervisors,

I have a particular interest in helping to make people's experience in and around jails less de-humanizing. One reason is that in the past I worked on projects with juvenile offenders and saw how difficult their lives were. It makes no sense to make the lives of both people who are in jail and of people who know and care about those who are in jail. It is both counter-productive as well as inhumane.

Schick-1

Please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

A new LA county jail in Lancaster will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

Please refer to responses to form letter

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the County of Los Angeles, in extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

--

Laurie Schick
mojosafari@yahoo.com
Beverly Hills, California 90211

Laurie Schick (February 29, 2016)

Schick-1

The commenter has worked with juvenile offenders and considers jails to be counter-productive and inhumane. This comment relates to the merits of the proposed Project and not the environmental analysis included in the Draft Environmental Impact Report (EIR) or the environmental impacts of the Project.

Please refer to responses for Form Letter-1 through Form Letter-6 for remaining comments.

-----Original Message-----

From: Erica Shehane [mailto:ericashehane@gmail.com]

Sent: Wednesday, January 06, 2016 3:08 PM

To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental <environmental@ceo.lacounty.gov>; lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov; FifthDistrict@lacbos.org

Subject: Attn: Mira Loma Women's Jail Environmental Impact Report

Dear LA County Chief Exec Office and Board of Supervisors,

I oppose the building of a new jail because money should be spent on incarceration alternatives, such as mental health and substance abuse services.

} Shehane-1

Please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

A new jail in Lancaster County will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

} Please refer to responses to form letter

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the County of Los Angeles, in extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

--

Erica Shehane
ericashehane@gmail.com
90021

Erica Shehane (January 6, 2016)

Shehane-1

The commenter does not want money spent on building a new jail and prefers incarceration alternatives.

The purpose of and need for the Project is described in detail in Section 3.1, Project Background, of the Draft EIR. That section provides information regarding the County's existing detention facilities, relevant regulatory mandates, and studies analyzing future facility needs, including for housing of female inmates. The proposed jail planning is set in the context of the County's other programmatic and financial support of diversion from incarceration. The County has a concurrent focus on diversion from incarceration as it considers this Project. Therefore, the proposed Project is consistent with the Board of Supervisor's consideration of policy issues addressing alternative approaches to incarceration.

Please refer to responses for Form Letter-1 through Form Letter-6 for remaining comments.

-----Original Message-----

From: Hilda Sims [mailto:rayesims03@gmail.com]

Sent: Wednesday, January 06, 2016 6:02 PM

To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental <environmental@ceo.lacounty.gov>; lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov; FifthDistrict@lacbos.org

Subject: Attn: Mira Loma Women's Jail Environmental Impact Report

Dear LA County Chief Exec Office and Board of Supervisors,

[After all these years. I can't believe the State of California is still in denial. You know jails is not the solution. Try more counseling and group therapy. That shit started from youth. Yes parents need to step up and talk about what really happening. Being in jails only allows a person to hold on to anger.

} Sims-1

Please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

A new jail in Lancaster County will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

} Please refer to responses to form letter

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the County of Los Angeles, in extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

--

Hilda Sims
rayesims03@gmail.com
1718 N.Willow Av.
Compton , California 90221

Hilda Sims (January 6, 2016)

Sims-1

The commenter states that jail is not the answer and more counselling and group therapy is needed. The purpose of and need for the Project is described in detail in Section 3.1, Project Background, of the Draft EIR. That section provides information regarding the County's existing detention facilities, relevant regulatory mandates, and studies analyzing future facility needs, including for housing of female inmates. The proposed jail planning is set in the context of the County's other programmatic and financial support of diversion from incarceration. The County has a concurrent focus on diversion from incarceration as it considers this Project. Therefore, the proposed Project is consistent with the Board of Supervisor's consideration of policy issues addressing alternative approaches to incarceration.

Please refer to responses for Form Letter-1 through Form Letter-6 for remaining comments.

-----Original Message-----

From: Kabira Stokes [mailto:kabiramiriam@gmail.com]

Sent: Tuesday, January 12, 2016 12:53 PM

To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental <environmental@ceo.lacounty.gov>; lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov; FifthDistrict@lacbos.org

Subject: Attn: Mira Loma Women's Jail Environmental Impact Report

Dear LA County Chief Exec Office and Board of Supervisors,

I write to you as a small business owner, and a concerned citizen.

Please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

A new LA county jail in Lancaster will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the County of Los Angeles, in extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

--

} Stokes-1



Please refer to responses to form letter

Kabira Stokes
kabiramiriam@gmail.com
2543 Glendower Ave
Los Angeles, CA 90027
Isidore Electronics Recycling

Kabira Stokes (January 12, 2016)

Stokes-1

This comment states that the commenter is a small business owner and concerned citizen. This comment does not address the proposed Project, the environmental analysis included in the Draft Environmental Impact Report (EIR), or the environmental impacts of the Project.

Please refer to responses for Form Letter-1 through Form Letter-6 for remaining comments.

-----Original Message-----

From: Andrew Szeto [mailto:Szeto.andrew@gmail.com]

Sent: Wednesday, January 06, 2016 9:28 PM

To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental <environmental@ceo.lacounty.gov>; lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov; FifthDistrict@lacbos.org

Subject: Attn: Mira Loma Women's Jail Environmental Impact Report

Dear LA County Chief Exec Office and Board of Supervisors,

I am writing in solidarity from San Francisco, where we were able to successfully stop a new jail from being constructed. For the same reasons people from LA county are saying no, we have shown that it is politically possible and necessary to stop jail expansion and fund real alternatives.

} Szeto-1

Please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

A new jail in Lancaster County will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

} Please refer to responses to form letter

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the County of Los Angeles, in extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

--

Andrew Szeto
Szeto.andrew@gmail.com

Andrew Szeto (January 6, 2016)

Szeto-1

The author indicates in his introductory remarks that he is from San Francisco and that he believes that it has been demonstrated there that it is "politically possible and necessary" to stop expanding jails and fund alternatives. This comment relates to the merits of the proposed Project, and not the environmental analysis included in the Draft EIR or the environmental impacts of the Project.

Please refer to responses for Form Letter-1 through Form Letter-6 for remaining comments.

Original Message-----

From: Rei Terada [mailto:dorab561@yahoo.com]

Sent: Wednesday, January 06, 2016 3:00 PM

To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental <environmental@ceo.lacounty.gov>; lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov; FifthDistrict@lacbos.org

Subject: Attn: Mira Loma Women's Jail Environmental Impact Report

Dear LA County Chief Exec Office and Board of Supervisors,

Dear all: I have been persuaded by arguments from various social justice and environmental rights organizations that the following statements are true:

} Terada-1

Please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

A new jail in Lancaster County will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

} Please refer to responses to form letter

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the County of Los Angeles, in extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

--

Rei Terada
dorab561@yahoo.com
2013 Micheltorena St
Los Angeles, CA 90039

Rei Terada (January 6, 2016)

Terada-1

This comment states that the commenter has been persuaded by various social justice and environmental rights organizations that the statements in the form letter are true.

Please refer to responses for Form Letter-1 through Form Letter-6 for remaining comments.

-----Original Message-----

From: Michael Terry [mailto:michaelgterry@hotmail.com]

Sent: Wednesday, January 06, 2016 4:45 PM

To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental <environmental@ceo.lacounty.gov>; lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov; FifthDistrict@lacbos.org

Subject: Attn: Mira Loma Women's Jail Environmental Impact Report

Dear LA County Chief Exec Office and Board of Supervisors,

We need more schools (with smaller class sizes) and fewer jails (with reduced sentencing for non-violent offenses).

} Terry-1

Please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

A new jail in Lancaster County will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

} Please refer to responses to form letter

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the County of Los Angeles, in extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

--

Michael Terry (January 6, 2018)

Terry-1

The commenter states that we need more schools and fewer jails. 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 has a concurrent focus on diversion from incarceration as it considers this Project. Therefore, the proposed Project is consistent with the Board of Supervisor's consideration of policy issues addressing alternative approaches to incarceration.

Please refer to responses for Form Letter-1 through Form Letter-6 for remaining comments.

-----Original Message-----

From: Shabina Toorawa [mailto:shabina.toorawa@gmail.com]

Sent: Wednesday, March 02, 2016 11:58 PM

To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental <environmental@ceo.lacounty.gov>; lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov; FifthDistrict@lacbos.org

Subject: Attn: Mira Loma Women's Jail Environmental Impact Report

Dear LA County Chief Exec Office and Board of Supervisors,

The following are my concerns for the construction of this jail on environmental grounds:

How does this new women's jail benefit the community? What positive impacts does this project have on youth? What positives impacts does this construction have on community health?

} Toorawa-1

Valley Fever

If there is an epidemic of valley fever, what kind of medical services are going to be allotted to the prisoners?

} Toorawa-2

Water Distribution

Given that California is experiencing a drought, how will the construction of this jail effect water use per capita for community residents?

} Toorawa-3

Fires

Lancaster is prone to fires, what are the types of fire services that will be provided?

} Toorawa-4

Air

What are the chemicals that will be used in the construction?

What schools are in the area, and how will that affect them?

} Toorawa-5

Energy

How energy efficient is this place going to be, is it going to rely on the community?

} Toorawa-6

Landfills

Where are the landfills, and what type of recycling plan will be in place for the community?

Ecologically, what does that look like on the grand scale based on the 1300 tons of waste estimated, what does that look like as a recycling program in the community?

} Toorawa-7

Have you researched the wildlife, are there endangered species in the area?

} Toorawa-8

Historic Landmark

(northwest historic district- historic aviation hangars play role in community for education) Have you been in correspondence with the historic society?

What type of monument is the site, will its integrity remain with the construction?

how many children visit? will construction affect the types of commuters that come for education?

} Toorawa-9

Human Impact

Have any of your scientists looked at the negative impact this construction will have on people?
Have they looked at the ecological impacts of construction?
How will the air and noise pollution affect the psychology of those living in the community?
Which native tribes gave permission for construction, and when was this permission acquired? (These grievances change over time) Have you consulted with Native American Graves Protection and Repatriation Act at the federal level?

Toorawa-10

Please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

A new LA county jail in Lancaster will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

Please refer to responses to form letter

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the County of Los Angeles, in extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

--

Shabina Toorawa
shabina.toorawa@gmail.com

Shabina Toorawa (March 2, 2016)

Toorawa-1

The commenter lists her environmental concerns for the construction of the jail. She questions the benefits of the jail on the community, the youth, and the community health.

The goal of the Project is to provide detention facilities for low- to medium-security level female inmates that meet modern correctional standards and that prioritize the on-site integration of gender-responsive female inmate education, treatment, and vocational training. This goal focuses on providing a secure detention facility with cost-effective therapeutic and rehabilitative programs to meet needs of eligible female inmates in order to reduce recidivism.

The supporting objectives of the Project are outlined in Section 3.2.2 of the Draft Environmental Impact Report (EIR) and include the following:

- A. To prioritize the on-site integration of gender-responsive female inmate education, treatment, and vocational training to reduce female inmate recidivism.
 - 1. To maximize system-wide efficiencies for County jails by providing a women's facility to permit Gender Responsive Rehabilitation (GRR) model programming for eligible low- to medium-security female inmates.
 - 2. To provide a facility reflective of "real world" living that incorporates abundant natural light, opportunities for social interactions in landscaped open spaces, and defined functional areas to promote release readiness and community reintegration within a secured detention perimeter.
 - 3. To reduce recidivism through programming and development of a women's detention facility at a site with sufficient space to accommodate both campus-style inmate housing and support facilities for education and vocational training, implementing the best practices of Education Based Incarceration (EBI), within a secured detention perimeter.
- B. To provide a detention facility with capacity for eligible low- to medium-security level female inmates.
 - 4. To permit re-allocation of detention facilities designed for higher security levels for male inmates and/or inmates with special security or other needs to serve the appropriate security-level populations.
 - 5. To provide a facility with adequate capacity for a selected subset of the female inmate population based on security level and health status based on system trend analysis from data 2001-2013, which includes the beginning of the "AB 109" [Assembly Bill 109] population of Low – Level (N3) Offender Population, and later state law changes.
 - 6. To reduce inmate overcrowding according to the BSCC [California Board of State and Community Corrections] standards for rated capacity, as determined for the qualifying female inmate population.
- C. To maximize the financial resources available to the County's correctional system for construction and operation of jail facilities serving female inmates.
 - 7. To avoid or minimize land acquisition and entitlement costs and to efficiently use existing County-owned physical assets.

8. To avoid or minimize costs and delays to resolve easement and other land title clearances involving other parties' property interests.
9. To avoid new land use conflicts by prioritizing the re-use of currently or formerly operated County-owned property with detention facilities.
10. To control the higher costs of new construction compared to the cost of renovation of existing facilities and the higher costs of maximum security construction compared to medium and low security detention facility construction by renovating and re-purposing existing facilities and infrastructure and/or designing separate low and medium security detention facilities where feasible.
11. To maximize the use of state grant funds from AB 900 and any other grant funds, including the maximization of the number of female inmate beds covered per grant.
12. To minimize the County's net cost to fund a female detention facility, including long-term operation and maintenance costs.

The Project would meet these goals and objectives, which would present benefits to the community.

Toorawa-2

Regarding the commenter's concern on an epidemic of Valley Fever, that topic is discussed in Section 4.2, Air Quality, of the Draft EIR. Also, please refer to the response for Form Letter-5.

Toorawa-3

The comment on water use by the project is addressed in Section 4.14, Utilities and Service Systems, of the Draft EIR and in the response for Form Letter-4.

Toorawa-4

Regarding the comment on fire services, fire protection services will be provided by the Los Angeles County Fire Department (LACFD), as discussed in Section 4.12, Public Services and Recreation. Also, Threshold 4.7h in Section 4.7, Hazards and Hazardous Materials, addresses wildfire hazards and the regulatory requirement (RR PS-1) to prevent fire hazards.

Toorawa-5

Regarding the question on chemical use, various hazardous materials will be used for construction and include, but are not limited to, fuels, lubricating oils, solvents, antifreeze, hydraulic fluid, and compressed gases. In addition, construction activities would utilize some hazardous materials (e.g., paints and solvents) and would generate hazardous waste streams such as waste oil and empty containers that previously held hazardous materials. This issue is discussed in Section 4.7, Hazards and Hazardous Materials. Threshold 4.7c on pages 4.7-17 to 4.7-18 specifically address hazards to nearby schools. As stated, the Project would use, store, and dispose of hazardous materials, substances, and/or wastes in accordance with existing regulations (Regulatory Requirement [RR] HAZ-1 through RR HAZ-3) and would not pose hazards to on-site inmates, staff, visitors, or volunteers or to children in nearby schools.

Toorawa-6

On the question of the energy efficiency of the Project, as discussed in Section 3.0, Project Description, the Project would feature a number of Green Building and Sustainability Features in accordance with the County's Low Impact Development (LID) Ordinance, the County's Drought-Tolerant Landscaping Ordinance, and the County's Green Building Ordinance. Additionally, the Project would be connected to the County's adjacent solar energy facility, which would provide up to one megawatt (MW) of electricity to the site. Section 4.15, Energy, analyzes the Project's demand for energy and identifies the Project Design Features (PDFs) and Regulatory Requirements (RRs) that would reduce energy demand from the Project.

Toorawa-7

Regarding the comment on landfills and recycling programs, Section 4.14, Utilities and Service Systems, identifies that the landfills that would serve the Project are the Lancaster Landfill and Recycling Center and the Antelope Valley Landfill. Solid waste generation during operation of the Project is estimated at 1,384 tons per year (DLR Group 2015). The proposed Project would operate a number of recycling programs in accordance with County directives (RR UTL-4). This would include the purchase and use of re-refined motor oil in all County motorized vehicles and equipment; the purchase and use of 30 percent recycled-content paper, electronic waste surplus, and used printer cartridges; encouragement of reduced paper-based correspondence; paper and beverage container collection and recycling; purchase and use of remanufactured laser toner cartridges for black and white printers and copiers; restricted use of styrofoam containers; and prohibited use of plastic carryout bags (LACDPW 2015).

The MLWDC waste handling protocol requires that deputies are responsible for ensuring that the barrack trustees have collected all trash from inside the barracks and from the compound area. The trash is then pre-sorted and separated for recycling as a standard operating procedure, when practical. The Project's barracks/compound trash shall be sorted into recyclable and food waste, and placed into separate blue recycling containers. Therefore, the estimated 1,384 tons per year of solid waste generated by the Project would be reduced through the implementation of various recycling programs.

Toorawa-8

Regarding the comment on wildlife and endangered species, Section 4.3, Biological Resources, of the Draft EIR identifies existing vegetation and wildlife species that have the potential to occur on the site and those that were observed during surveys of the site. The site did not have any plant or wildlife species that are identified as Endangered, Threatened, Candidate, Sensitive, or Special Status. Also, there were no riparian habitats or other special status vegetation types that occur on or immediately adjacent to the Project site. However, construction of the Project may have the potential to affect roosting bats and nesting birds. MM BIO-1, which calls for pre-construction bat surveys and bat exclusion, would reduce impacts to roosting bats. MM BIO-2 requires seasonal avoidance or pre-construction surveys for nesting birds to reduce disturbance of nesting birds. Based on the analysis in the Draft EIR, impacts to wildlife would be less than significant after mitigation.

Toorawa-9

Regarding the comment on the historic district and hangars, Section 4.4, Cultural Resources, discusses the historical buildings in and near the site. The Notice of Preparation was mailed to the Los Angeles Conservancy, and the Notice of Completion was mailed to the Los Angeles

Conservancy and the Antelope Valley Rural Museum. Regarding correspondence with the historic society, the preparers of the Historical Resource Report conducted research on the history of buildings, structures, objects and landscape features within the Project site and the surrounding area; reviewed ordinances, statutes, regulations bulletins and technical materials related to historic preservation; and conducted a field inspection to determine the historical significance of the individual buildings and group of buildings. The public notices for the Project also informed members of the local historical society, some of whom have provided comments on the Draft EIR.

The northwest corner of the MLDC was evaluated as a potential historic district. Based on the evaluation, 27 buildings are considered contributors to the Polaris Flight Academy Historic District and 8 buildings are considered non-contributors. The majority of the proposed renovation and new construction would occur outside the Historic District. Changes within the Historic District would be limited to (1) demolition of non-contributing buildings (i.e., Wooden Shed, Quonset Hut, and Old Lock Building) for the creation of a parking lot and other minor utility trenching in paved areas within the District boundaries and (2) decommissioning of the register-ineligible Central Boiler Plant (i.e., steam plant) and demolition of the ESB Building for construction of the new food warehouse and laundry. None of the District's contributing buildings or structures would be impacted by the proposed Project. Changes in the vicinity of Hangars 1 and 2 would also be visual in nature and only minimally alter their immediate setting.

Specifically, construction activities would not materially alter the physical characteristics that convey the significance of the historical resources. After Project construction, all historical resources within the Historic District would remain eligible for listing in both the National Register of Historic Places (NRHP) and the California Register of Historic Resources (CRHR). The operation of the MLWDC would not involve changes to the hangars or structures within the Polaris Flight Academy Historic District. No impact to nearby historical resources would occur.

Regarding the comment on the number of children who visit and types of commuters that come for education, the buildings at the MLDC that comprise the Polaris Flight Academy Historic District are not open to the public. Thus, there are no visitors or children that come to the Historic District.

Toorawa-10

Regarding the comment on the negative impact of construction, the Draft EIR addresses the potential direct, indirect, and cumulative impacts of construction and operation of the Project on all environmental issue areas. As demonstrated throughout the Draft EIR, all potentially significant impacts have been reduced to levels that are less than significant through the identified mitigation measures, and no significant unavoidable environmental impacts would result from Project implementation.

Potential impacts to the psychology of nearby residents is beyond the scope of the Draft EIR. Regarding the commenter's concern about air pollution, Section 4.2, Air Quality, analyzes the Project's construction and long-term emissions. Regarding the commenter's concern about noise, Section 4.10, Noise, discusses the existing noise environment and the increase in noise that would accompany construction and operation of the Project. Regarding the comment on permission from native tribes, Section 4.4, Cultural Resources, identifies the Native American tribes and individuals who were mailed an informational letter on February 3, 2014, requesting any information they might have regarding cultural resources in the area:

- Beverly Salazar Folkes, Chumash, Tataviam, and Fernandefio Tribal Member
- Larry Ortega, Chairperson, Fernandefio Tataviam Band of Mission Indians

- Ron Andrade, Director, LA City/County Native American Indian Commission
- Delia Dominguez, Chairperson, Kitanemuk and Yowlumne Tejon Indians
- John Valenzuela, Chairperson, San Fernando Band of Mission Indians
- Randy Guzman-Folkes, Chumash, Fernandefño, Tataviam, Shoshone Paiute, and Yaqui Tribal Member
- Daniel McCarthy, M.S., Director-CRM Department, San Manuel Band of Mission Indians

Daniel McCarthy of San Manuel Band of Mission Indians responded via email on February 6, 2014, and stated that, given the nature and location of the Project, the San Manuel Band has no concerns (McCarthy 2014). See Appendix C of this Final EIR. No other responses have been received to date.

Regarding the Native American Graves Protection and Repatriation Act, this Act is a federal law passed in 1990 that provides a process for museums and federal agencies to return certain Native American cultural items (i.e., human remains, funerary objects, sacred objects, or objects of cultural patrimony) to lineal descendants and culturally affiliated Indian tribes and Native Hawaiian organizations. In addition, the Act authorizes federal grants to Indian tribes, Native Hawaiian organizations, and museums to assist with the documentation and repatriation of Native American cultural items and establishes the Native American Graves Protection and Repatriation Review Committee to monitor the process and facilitate the resolution of disputes that may arise concerning repatriation.

The excavation and inadvertent discovery provisions of this Act apply only to federal and tribal lands. If the burial ground is not on federal or tribal land, then this Act does not apply. Thus, this Act does not apply to the proposed Project. However, other state and federal cultural preservation laws may apply, and state or local cemetery laws may also apply.

In accordance with California law, in the event of the discovery of human remains, all work shall halt at the site and or any nearby areas reasonably suspected to overlie adjacent remains and the County Coroner shall be notified in compliance with Section 7050.5 of the *California Health and Safety Code* (RR CUL-1). The Coroner will determine whether the remains are of forensic interest within two working days of receiving notification. If the Coroner, with the aid of the qualified Archaeologist, determines that the remains are prehistoric, the Coroner will contact the Native American Heritage Commission (NAHC) within 24 hours of the determination. The NAHC shall be responsible for designating the most likely descendant (MLD), who will be responsible for the ultimate disposition of the remains, as required by Section 5097.98 of the *California Public Resources Code*. Compliance with RR CUL-1 would ensure that impacts on human remains would be less than significant.

Please refer to responses for Form Letter-1 through Form Letter-6 for remaining comments.

-----Original Message-----

From: Lynda Tutt [mailto:Lyn_mic@att.net]

Sent: Saturday, February 06, 2016 9:03 AM

To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental <environmental@ceo.lacounty.gov>; lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov; FifthDistrict@lacbos.org

Subject: Attn: Mira Loma Women's Jail Environmental Impact Report

Dear LA County Chief Exec Office and Board of Supervisors,

The United States is the only free country with huge amounts of human beings locked up in jail. The USA is the first to talk about human rights. Yet look at the incarceration rate put on poor communities. We demand that this jail not be built.

} Tutt-1

Please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

A new LA county jail in Lancaster will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

} Please refer to responses to form letter

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the County of Los Angeles, in extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

} Cont.

--

Lynda Tutt
Lyn_mic@att.net
1243 West 69th Street
Los Angeles, California 90044
Community Coalition

Lynda Tutt (February 6, 2016)

Tutt-1

The commenter alleges that the US is the first to talk about human rights but has a huge prison population. She demands that the jail not be built. This comment relates to the merits of the proposed Project and not the environmental analysis included in the Draft Environmental Impact Report (EIR) or the environmental impacts of the Project.

Please refer to responses for Form Letter-1 through Form Letter-6 for remaining comments.

-----Original Message-----

From: Diana Valenzuela [mailto:dvalenzuela179@gmail.com]

Sent: Wednesday, January 06, 2016 2:39 PM

To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental <environmental@ceo.lacounty.gov>; lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov; FifthDistrict@lacbos.org

Subject: Attn: Mira Loma Women's Jail Environmental Impact Report

Dear LA County Chief Exec Office and Board of Supervisors,

Hello, my name is Diana and I am opposed to the construction of this jail for the negative consequences it can have on the health of the people incarcerated, the environment, and the community of Lancaster.

} Valenzuela-1

Please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

A new jail in Lancaster County will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

} Please refer to responses to form letter

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the County of Los Angeles, in extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

--

Diana Valenzuela
dvalenzuela179@gmail.com
90024

Diana Valenzuela (January 6, 2016)

Valenzuela-1

This comment alleges that the proposed Project would have negative consequences on the health of inmates, the environment, and the community of Lancaster. This comment is responded to by the analysis in the Draft Environmental Impact Report that demonstrates there will be no environmentally significant adverse environmental impacts with the Project and also specifically as summarized in the incorporated response for Form Letter-3 relating to hazardous wastes.

Please refer to responses for Form Letter-1 through Form Letter-6 for remaining comments.

From: Nancy Van Iderstine <nanvan108@gmail.com>
Sent: Friday, February 05, 2016 1:02 PM
To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental; lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov; FifthDistrict@lacbos.org
Subject: Attn: Mira Loma Women's Jail Environmental Impact Report

Dear LA County Chief Exec Office and Board of Supervisors,

With all due respect, we don't need more jails. We need more help for those battling addiction, and economic revivals, such as measures to stop the outsourcing of jobs overseas.

} Van Iderstine-1

Please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

A new LA county jail in Lancaster will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

} Please refer to responses to form letter

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the County of Los Angeles, in extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

--
Nancy Van Iderstine
nanvan108@gmail.com

Nancy Van Iderstine (February 5, 2016)

Van Iderstine-1

The commenter states that we do not need more jails and instead need more help battling addiction; need economic revival and stop outsourcing jobs overseas. 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 has a concurrent focus on diversion from incarceration as it considers this Project. Therefore, the proposed Project is consistent with the Board of Supervisor's consideration of policy issues addressing alternative approaches to incarceration.

Please refer to responses for Form Letter-1 through Form Letter-6 for remaining comments.

From: Alejandro Villalpando <avill030@ucr.edu>
Sent: Friday, February 05, 2016 12:57 PM
To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental; lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov; FifthDistrict@lacbos.org
Subject: Attn: Mira Loma Women's Jail Environmental Impact Report

Dear LA County Chief Exec Office and Board of Supervisors,

My name is Alex Villalpando and I am an educator. I work with predominantly first generation college students. They're hard working, intellectually aware, and future leaders of Los Angeles and the State of California. We consistently have conversations regarding our current economic crisis and the impacts on their employment prospects. A major part of our economic crisis has been exacerbated because the continued expansion of prisons and the drain this process has on education, families, and communities. Please help build a better and more dignified California for all of us.

Villalpando-1

Please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

A new LA county jail in Lancaster will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

Please refer to responses to form letter

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the County of Los Angeles, in extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

--
Alejandro Villalpando
avill030@ucr.edu

715 W. 108th Street
Los Angeles, California 90044

Alejandro Villalpando (February 5, 2016)

Villalpando-1

This introductory comment indicates that the author is an educator and alleges a connection between the economic crisis and the expansion of prisons. The commenter requests a different approach as a matter of policy. This comment relates to the merits of the proposed Project, and not the environmental analysis included in the Draft Environmental Impact Report (EIR) or the environmental impacts of the Project.

Please refer to responses for Form Letter-1 through Form Letter-6 for remaining comments.

From: Harry Waksberg <harry.waksberg@gmail.com>
Sent: Friday, February 05, 2016 9:32 AM
To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental; lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov; FifthDistrict@lacbos.org
Subject: Attn: Mira Loma Women's Jail Environmental Impact Report

Dear LA County Chief Exec Office and Board of Supervisors,

My name is Harry Waksberg, and I do not believe LA County - where I lived for years and still love dearly - needs another jail.

} Waksberg-1

Please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

A new LA county jail in Lancaster will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

} Please refer to responses to form letter

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the County of Los Angeles, in extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

Thank you very much for reading my message, and I hope you take seriously the needs of Southern Californians.

} Waksberg-2

--
Harry Waksberg
harry.waksberg@gmail.com
Riverside, CA 92507

Harry Waksberg (February 5, 2016)

Waksberg-1

The commenter says he does not believe the County needs another jail. The purpose of and need for the Project is described in detail in Section 3.1, Project Background, of the Draft EIR. That section provides information regarding the County's existing detention facilities, relevant regulatory mandates, and studies analyzing future facility needs, including for housing of female inmates. The proposed jail planning is set in the context of the County's other programmatic and financial support of diversion from incarceration. The County has a concurrent focus on diversion from incarceration as it considers this Project. Therefore, the proposed Project is consistent with the Board of Supervisor's consideration of policy issues addressing alternative approaches to incarceration.

Please refer to responses for Form Letter-1 through Form Letter-6 for remaining comments.

Waksberg-2

Thank you for your comment letter. This Final EIR, including all comments submitted to the County on the Draft EIR, will be provided to the County of Los Angeles Board of Supervisors. Therefore, your concerns will be presented directly to the decision makers prior to consideration of Project approval.

-----Original Message-----

From: Matthew Weathers [mailto:togerez@gmail.com]

Sent: Wednesday, January 06, 2016 1:23 PM

To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental <environmental@ceo.lacounty.gov>; lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov; FifthDistrict@lacbos.org

Subject: Attn: Mira Loma Women’s Jail Environmental Impact Report

Dear LA County Chief Exec Office and Board of Supervisors,

I believe the environmental impact of building a new jail in Lancaster would be beyond devastating for the community in Lancaster as well as communities across Los Angeles - not only will the health of those in the area be negatively impacted, but the well being of those in the facility would be greatly impacted. The feasibility and impact of holding a human being in a restrictive fashion for years at a time will have a negative impact on all facets of their health and will effect their own families and loved ones in numerous ways. It is irresponsible and dangerous to build such a facility.

Weathers-1

Please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

A new jail in Lancaster County will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

Please refer to responses to form letter

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the County of Los Angeles, in extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

} Cont.

--

Matthew Weathers
togerez@gmail.com
2110 Lilac Lane
Glendale, CA 91206

Matthew Weathers (January 6, 2016)

Weathers-1

This comment alleges that building a new jail would be devastating to the health and well-being of the community and it is irresponsible and dangerous to build such a facility.

As demonstrated throughout the Draft EIR, all potentially significant impacts have been reduced to levels that are less than significant through the identified mitigation measures and no significant unavoidable environmental impacts would result from Project implementation.

Please refer to responses for Form Letter-1 through Form Letter-6 for remaining comments.

-----Original Message-----

From: Brianna Weeks [mailto:Brweeks@yahoo.com]

Sent: Tuesday, January 12, 2016 11:59 PM

To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental <environmental@ceo.lacounty.gov>; lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov; FifthDistrict@lacbos.org

Subject: Attn: Mira Loma Women's Jail Environmental Impact Report

Dear LA County Chief Exec Office and Board of Supervisors,

My name is Brianna Weeks and I am a student at Arizona State University studying social justice and human rights. I feel strongly about alternatives to incarceration and oppose the building of new jails which ultimately do not make our communities safer. While I am not a resident of LA county, I stand in solidarity with the community that will be affected by jail construction.

} Weeks-1

Please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

A new LA county jail in Lancaster will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

} Please refer to responses to form letter

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the County of Los Angeles, in extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

--

Brianna Weeks
Brweeks@yahoo.com
2902 w Sweetwater ave
Phoenix, Az 85092
Arizona state university

Brianna Weeks (January 12, 2016)

Weeks-1

The author identifies herself as a non-County resident student at Arizona State University who opposes new jails on the ground they do not make a community safer. She indicates that she is in "solidarity" with communities that will be "affected" by the proposed project.

This comment relates to the merits of the proposed Project, and not the environmental analysis included in the Draft EIR or the environmental impacts of the Project other than the community effects outlined in the succeeding comments and responded to in the incorporated responses.

Please refer to responses for Form Letter-1 through Form Letter-6 for remaining comments.

-----Original Message-----

From: Benjamin Wood [mailto:donotreply@wordpress.com]

Sent: Tuesday, January 12, 2016 12:28 PM

To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental <environmental@ceo.lacounty.gov>; lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov; FifthDistrict@lacbos.org

Subject: Attn: Mira Loma Women's Jail, Environmental Impact Report

Name: Benjamin Wood

Email: bnjmn.wood@yahoo.com

Address: 4638 San Bernardino St

City: Montclair

State: CA

Zip Code: 91763

Comment (please personalize): Dear LA County Chief Executive Office and Board of Supervisors,

While the current state of mass incarceration leads in the US leads me to oppose the construction of all new jails and detention facilities on general principle, I would like you to please consider the environmental reasons I oppose this particular project, the new women's facility at Mira Loma in Lancaster.

} Wood-1

In response to theDraft Environmental Impact Report (EIR) released on November 9th:

A new LA county jail in Lancaster will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

} Please refer to responses to form letter

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the County of Los Angeles, in extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After

completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

} Cont.

Time: January 12, 2016 at 8:27 pm

IP Address: 173.75.116.21

Contact Form URL: <http://lanomorejails.org/2016/01/05/urgent-submit-comment-now-against-proposed-new-la-county-jail/>

Sent by an unverified visitor to your site.

Benjamin Wood (January 12, 2016)

Wood-1

The comment author indicates that he opposes on principle all jails in light of the status of incarceration in the United States, but requests that the County consider the "environmental reasons" he opposes the proposed facility in particular, as set out in the Form Letter.

The environmental and other points in the Form Letter are responded to in those incorporated responses. Please refer to responses for Form Letter-1 through Form Letter-6 for these remaining comments.

-----Original Message-----

From: Jasmine Yende [mailto:Jazzmataz39@aol.com]

Sent: Wednesday, March 02, 2016 8:38 AM

To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental <environmental@ceo.lacounty.gov>; lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov; FifthDistrict@lacbos.org

Subject: Attn: Mira Loma Women's Jail Environmental Impact Report

Dear LA County Chief Exec Office and Board of Supervisors,

Hello, I am a victim of the prison industrial system and strongly oppose the new prison being built.

Please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

A new LA county jail in Lancaster will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the County of Los Angeles, in extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

} Yende-1

} Please refer to responses to form letter

--

Jasmine Yende
Jazzmataz39@aol.com
2135 e 120th st
Los angeles, CA 90059

Jasmine Yende (March 2, 2016)

Yende-1

The commenter states that she is a victim of the prison industrial system and opposes the new prison. This comment relates to the merits of the proposed Project and not the environmental analysis included in the Draft Environmental Impact Report (EIR) or the environmental impacts of the Project.

Please refer to responses for Form Letter-1 through Form Letter-6 for remaining comments.

Final Environmental Impact Report

Response to Comments, Mitigation Monitoring and Reporting Program, and Revisions, Clarifications, and Corrections to the Draft EIR

**County of Los Angeles
Mira Loma Women's Detention Center Project
City of Lancaster, California**

SCH No. 2014091012

Volume 3

Prepared for | County of Los Angeles Chief Executive Office
Capital Projects/Debt Management Division
754 Kenneth Hahn Hall of Administration
500 West Temple Street
Los Angeles, California 90012

Prepared by | BonTerra Psomas
225 South Lake Avenue, Suite 1000
Pasadena, California 91101
T: (626) 351-2000 F: (626) 351-2030

September 2016



TABLE OF CONTENTS

<u>Section</u>	<u>Page</u>
<u>Volume 1</u>	
Section 1.0 Introduction	1
1.1 The California Environmental Quality Act and Public Review of the Draft Environmental Impact Report	1
1.2 Project Description.....	4
1.2.1 <i>Project Location and Setting</i>	4
1.2.2 <i>Project Description</i>	5
1.3 Summary of Environmental Impacts.....	6
Section 2.0 Responses to Comments	7
2.1 State, Regional, and Local Agencies.....	8
2.1.1 <i>Antelope Valley Air Quality Management District (AVAQMD)</i>	9
2.1.2 <i>Los Angeles County Fire Department (LACFD)</i>	10
2.1.3 <i>Los Angeles County Sanitation Districts (Districts)</i>	11
2.1.4 <i>State of California Clearinghouse and Planning Unit (SCH)</i>	13
2.1.5 <i>State of California Clearinghouse and Planning Unit (SCH)</i>	14
2.2 Organizations.....	15
2.2.1 <i>Antelope Valley Rural Museum (AVRM)</i>	16
2.2.2 <i>Californians United for a Responsible Budget (CURB)</i>	17
2.2.3 <i>Critical Resistance Los Angeles et al. (CRLA)</i>	20
2.2.4 <i>National Day Laborer Organizing Network (NDLON)</i>	64
2.2.5 <i>National Immigration Law Center (NILC)</i>	67
2.2.6 <i>Weingart</i>	70
2.2.7 <i>Women of Color in the Global Women's Strike (WOC)</i>	102
<u>Volume 2</u>	
2.3 Individuals.....	110
2.3.1 <i>Form Letter</i>	113
2.3.2 <i>Individualized Introductions to Form Letters</i>	122
<u>Volume 3</u>	
2.3.3 <i>Individual Comment Letters</i>	215
Section 3.0 Mitigation Monitoring and Reporting Program.....	389
Section 4.0 Revisions, Clarifications, and Corrections on the Draft EIR.....	411
Section 5.0 References	417

TABLES

<u>Table</u>		<u>Page</u>
3-1	Mitigation Monitoring and Reporting Program.....	390
4-1	Jail Plan Report Summary of Options	415

APPENDICES

Appendices

- A Form Letters
- B Cultural Resources Records Search
- C San Manuel Band of Mission Indians Response to the Project
- D Limited Asbestos and Lead-Based Paint Sampling Report - Buildings 27, 28, 29, 32 and 40
- E California Environmental Reporting System (CERS) database and Monitoring System Certification
- F Supplemental Phase II ESA Soil Sampling Report

2.3.3 INDIVIDUAL COMMENT LETTERS

A number of blank comment cards that were self-addressed and distributed at the public meetings held on December 8, 2015 and on February 9, 2016 for the public's convenience were filled out and returned to the County. In addition, individualized comment letters were submitted by various individuals. These individualized comment letters and comment cards came from the following individuals:

1. Alvis, Robert.....	216	31. Llamas, Naomi.....	277
2. Armstead, Sheila.....	217	32. Montague, Elliot.....	278
3. Bell, Shem.....	219	33. Nash, Launa.....	283
4. Benitez, Ravaut.....	220	34. Ortega, Jeronimo.....	285
5. Bunch, Evan.....	222	35. Ortiz, Mario.....	286
6. Cabta, Wendy.....	225	36. Pena-Vargas, Camela.....	287
7. Camacho-Rodriguez, Martha.....	226	37. Pinkel, Sheila.....	289
8. Carrillo, Vicente.....	228	38. Quintero, Ramon.....	312
9. Chesney, Peter.....	229	39. Quintero, Sergio.....	313
10. Christopher, Justin.....	230	40. Rand-Washington, Vickie Nicole.....	314
11. Corrales Limón, Karen.....	231	41. Rivas, Anayeli.....	317
12. Courtney, Craig.....	234	42. Rodriguez, Adrianna.....	319
13. Cristo, Robert.....	241	43. Rodriguez, Erik.....	321
14. Crotty, R.....	236	44. Rodriguez, K.....	323
15. de Hinojosa, Alana.....	242	45. Rodriguez, Raul.....	325
16. Fang, Betty.....	244	46. Rodriguez, Silvia.....	327
17. Gajaweena, Nalika.....	246	47. Salaam, Jamil.....	328
18. Gallardo, Ricardo.....	247	48. Segura, Erica.....	329
19. Gonzalez, Rosa.....	248	49. Silvestre, Audrey.....	331
20. Gutierrez, Josefina.....	250	50. Solorzano, Rafael.....	332
21. Harriman, Shirley.....	253	51. Sutton, Mary.....	333
22. Heaney, Jess.....	254	52. Vasquez, Mario.....	368
23. Hedges, Broghan.....	262	53. Wang, Christine.....	369
24. Jackson, Mackenzie.....	263	54. Watkins, Yasmin.....	371
25. Jn-marie, Pastor Cue.....	265	55. Williams, Norman Joseph.....	374
26. Johnson, Gilbert.....	266	56. Wong, Kenny.....	378
27. Jordon, Hal.....	268	57. Zardeneta, Robert.....	379
28. Kaplan, Victoria.....	269	58. Zuniga, Diana.....	382
29. Kate, Tutaya.....	274	59. No Name Provided.....	385
30. Lan, Lawrence.....	275	60. — X.....	387

From: alvisx1@netzero.net [mailto:alvisx1@netzero.net]
Sent: Monday, January 11, 2016 10:47 PM
To: CEO Environmental <environmental@ceo.lacounty.gov>
Subject: War Eagle Field / Mira Loma detention center

Our Beloved War Eagle Field, One of a kind.

In July 1939 the future security of the United States was placed in a large measure in the hands of a small group of Veteran pilots of World War I and non-military flyers. Nothing comparable to that had ever been done before. It was done then only because there was nothing else anybody could do. This was the year civilization as we knew it went off the deep end and people everywhere were fighting a war.

Our armed forces as of that year (1939) was more fiction than force. Our air arm to put it mildly, was ineffectual, and you could not build up an air force from scratch overnight. Even if we had the planes we didn't have the pilots to fly them. We had only one training air base, Randolph Field in Texas where they were turning out just 500 pilots a year.

Facing a desperate situation General Hap Arnold was faced with breaking new ground. He appealed to a small group World War One Pilots and a few non-military flyers whom he knew. These men were then operating their own commercial flying schools. He asked them if they would be willing to help train combat Pilots for the Army Air Corps asked would if they would take green youngsters into their schools, some who had never been near an airplane and teach them how to fly.

The Operators said yes, they would.

Would they do it although the Army, then without funds for that purpose, was unable to guarantee payment for such training?

The Operators said yes, they would.

And would they expanded their present facilities and finance the expansions if the Army asked them to do this too?

The operators said, yes, they would do that!

General Arnold looked into the faces of the original eight that had everything to lose and one at a time and said "If you let me down on this " God help us all for America is doomed if we can't pull off this miracle .

One of these eight was a World War One pilot named C.C.Moseley .It seems only yesterday that the command placed its entire future in the hands of a few patriotic men such as Mr. Moseley. Without the civilian contractors this command could not possibly have expanded from four or five hundred a year to the astounding rate of 110,000 pilots per year. War Eagle field is the story of that miracle and the reason it needs to survive.

Alvis-1

War Eagle Field / Polaris Flight Academy the sole survivor of the original eight at Lancaster California was one mile wide and comprised 640 acres . Commissioned in 1941 it was used shortly after Pearl Harbor for both RAF and American Eagle Squadron instruction. When the United States entered the war the school was shifted to AAF basic training and became one of the three civilian schools entrusted with advanced instruction of cadets.

War Eagle Field with its rich history and its impressive record of producing the finest pilots of its time period needs a chance to carry on as a living tribute to the will of the American people and the dedication of the individuals of not only those young men that trained there, but the citizens who made it work twenty four hours a day and the vision of one General and eight men that put country before self and trained the air force that would save the world.

Let's make this Field a lasting tribute for future Generations to come and visit when they need inspiration when things in their own lives become turbulent. And they can draw on the spirits of the men and women that proved that miracles can happen when tested.

War Eagle Field has been my passion for over the last thirty years and I would hate to see anything tragic happen to this history and facility. Please give it back its dignity and let it live again in a way that will benefit the young generations of families and school children for all time. Our history like this needs to live on.

Thank you for your consideration , Robert S Alvis , Antelope Valley Citizen for sixty years

Alvis-1
cont.

Alvis-2

Robert Alvis (January 11, 2016)

Alvis-1

The comment expresses admiration for the War Eagle Field as a unique resource. This comment then relates a story about the War Eagle Field and does not address the Project or the Environmental Impact Report (EIR). This Final EIR, including all comments submitted to the County on the Draft EIR, will be provided to the County of Los Angeles Board of Supervisors. Therefore, your concerns will be presented directly to the decision makers prior to consideration of Project approval.

Alvis-2

A summary of the findings of the Historical Resources Report is included in Appendix C-1 of the Draft EIR. The Report concludes that there is a historic district within the Project study area. The district, named the Polaris Flight Academy Historic District, meets the criteria for listing in the National Register of Historic Places (NRHP) and the California Register of Historical Resources (CRHR) for its direct associations with military aviation during World War II and the work of Major Corliss Champion Moseley (GPA 2015). It is therefore considered a historical resource subject to the requirements of CEQA.

As discussed in Section 4.4, Cultural Resources, the majority of the proposed renovation and new construction would occur outside the Historic District. Project implementation would only affect non-contributing features of the Historic District; therefore, the Project would not materially alter the physical characteristics that convey the significance of the historical resources. Thus, the Project would not adversely affect the Polaris Flight Academy Historic District or its potential recognition on federal or other historic registers.

The future uses of these buildings and structures, beyond the requirement to preserve the integrity of the Historic District, is outside the scope of the proposed Project. This Final EIR, including all comments submitted to the County on the Draft EIR, will be provided to the County of Los Angeles Board of Supervisors. Therefore, your concerns will be presented directly to the decision makers prior to consideration of Project approval.



MIRA LOMA WOMEN'S DETENTION CENTER PROJECT
 PUBLIC MEETING- DECEMBER 8, 2015
 6:00 TO 8:00 PM

COMMENTS:

More prisons is the easier way to deal with problems & instead of giving persons counseling or learning how to change behavior. More importantly the traffic pollution and illness of opening new jails and prisons seems unbearable. Many in the police department abuse their authority with both violence and by killing in many given situations. The police department misuse of authority seems "militant" and give poor meaning to the words "protect and serve"

Armstead-1
 Armstead-2
 Armstead-3

NAME: SHEILA ARMSTEAD
 ADDRESS: 9833 S. Western Ave
 E-MAIL: armsteadsheila66@gmail.com

Sheila Armstead

Armstead-1

Regarding the commenter's concern about the need for counseling and learning to change behavior, the Mira Loma Women's Detention Center (MLWDC) will offer general education classes, computer training, general and vocational career technical education, college courses, career counseling, a learning resource center, a library and computer labs, culinary classes, and indoor/outdoor recreation for inmates. Other services include religious services, counseling services, and community transition services. Participation in classes, training, and other activities will be scheduled for each inmate according to individual evaluation, interests, needs, and availability.

Course selections will be determined based on a students' needs for specific services, and students' interest levels. Courses will be offered during three blocks of time each weekday (morning, afternoon, and evening), providing opportunities for inmates to be enrolled in multiple courses. Programs are also divided into three categories based on program intensity: all-day, half-day, and evening programs. Examples of all-day programs (morning and afternoon) include culinary arts programs, cosmetology programs, and Prisoner Assisted Community Enhancement (PACE). Examples of half-day programs (morning or afternoon) include: small engine repair; animal grooming/training; social media management and marketing/office assistant; automotive detailing, windshield and headlight repair; and recycling. Examples of evening programs include: computer coding; small business entrepreneurship; community college; Associate of Arts Degree; and General Education. Other programs include prenatal programs, volunteer programs; peer mentoring; physical education; dance; arts and crafts; a commissary program; and book clubs.

Armstead-2

Regarding the commenter's concern about increased traffic, Section 4.13, Transportation and Traffic, of the Draft Environmental Impact Report (EIR) discusses potential impacts related to Project-generated traffic. The analysis indicates that increase in traffic volumes would not significantly impact local intersections (intersections would still operate at Level-of-Service D or better), or alternative transportation (Metrolink trains or Antelope Valley Transit Authority [AVTA] bus service), and impacts on California Department of Transportation (Caltrans) facilities would be less than significant. As discussed on page 4.13-23 and 4.13-24 of Section 4.13, Traffic and Transportation, the existing transit services in the area will adequately accommodate the increase of Project-generated transit trips. No mitigation is required for short-term construction or long-term operation traffic impacts.

Regarding the commenter's concern about increased air pollution, Section 4.2, Air Quality, presents the results of the emission analysis using California Emissions Estimator Model (CalEEMod) Version 2013.2.2. This computer program is used to calculate anticipated emissions associated with land development projects in California, including emissions from vehicles traveling to and from the Project site. As shown in Table 4.2-7 of Section 4.2, Air Quality, the estimated annual operational emissions due to Project-related operations would not exceed the Antelope Valley Air Quality Management District's (AVAQMD's) California Environmental Quality Act (CEQA) significance thresholds and potential impacts would be less than significant. In fact, emissions were well below the thresholds of significance. For example, carbon monoxide (CO) was the air contaminant with the highest annual rate of emission, and the Project was estimated to emit 18 tons per year, while the AVAQMD threshold of significance is 100 tons per year.

On the comment regarding illness, coccidioidomycosis, also known as Valley Fever, and its potential impact on potential future inmates and County staff is discussed in Section 4.2, Air Quality. A summary of hazards associated with the *Coccidioides* spores (i.e., the fungus that causes Valley Fever) is provided and includes trends related to Valley Fever in Los Angeles County, as inventoried and reported by the Los Angeles County Department of Public Health (LACDPH), which was consulted during the preparation of the Draft EIR.

The MLWDC property is not located in an area determined to be hazardous to the health of local residents or visitors to the region. The Draft EIR concludes that the potential future inmate population's temporary placement into the Antelope Valley, which includes the inmate's participation in all indoor and outdoor activities at the MLWDC, would not constitute placement into a hazardous existing environmental setting that would require mitigation. Additionally, the operation of the proposed Project would not increase the prevalence of Valley Fever spores or otherwise exacerbate an existing environmental condition. . Please see response for Form Letter-5 for additional detail regarding potential Project impacts relating to Valley Fever.

Armstead-3

This comment relates to the alleged actions of the police department and does not address the proposed Project, the environmental analysis included in the Draft EIR or the environmental impacts of the Project. This Final EIR, including all comments submitted to the County on the Draft EIR, will be provided to the County of Los Angeles Board of Supervisors. Therefore, your concerns will be presented directly to the decision makers prior to consideration of Project approval.



MIRA LOMA WOMEN'S DETENTION CENTER PROJECT
PUBLIC MEETING- DECEMBER 8, 2015
6:00 TO 8:00 PM

COMMENTS:

Building a Women's Jail will be a magnet
for environmental and economic fragility
profits at. Desert can create far
greater cost down the line. Please
stop irresponsible construction

Bell-1

Bell-2

NAME: Shem Bell
ADDRESS: 4017 Palmswood Dr #3 CA 90008
E-MAIL: Shembell28@gmail.com

Shem Bell

Bell-1

This comment alleges that the Project would be a magnet for what is characterized as environmental and economic tragedy. Although the Project site has been unoccupied since 2012, as discussed in Section 2.0, Environmental Setting, the Project site has generally been in operation and providing various detention/jail functions since 1945–1946. The MLWDC Project proposes the adaptive reuse, renovation, and expansion of the majority of the buildings at Mira Loma Detention Center (MLDC), which is an existing County asset. The redevelopment of the property would avoid the costs associated with constructing a new facility.

The Draft Environmental Impact Report (EIR) for the proposed Project has been prepared in accordance with the California Environmental Quality Act (CEQA, *California Public Resources Code*, Sections 21000 et seq.) and the State CEQA Guidelines (14 *California Code of Regulations* [CCR]), and addresses the potential direct, indirect, and cumulative impacts of the Project on all environmental issue areas. Section 5.0, Project Alternatives, was prepared in accordance with Sections 15126.6(a) through 15126.6(f) of the State CEQA Guidelines. As demonstrated throughout the Draft EIR, all potentially significant impacts have been reduced to levels that are less than significant through the identified mitigation measures, and no significant unavoidable environmental impacts would result from Project implementation.

Bell-2

This comment relates to the merits of the proposed Project and not the environmental analysis included in the Draft EIR or the environmental impacts of the Project. This Final EIR, including all comments submitted to the County on the Draft EIR, will be provided to the County of Los Angeles Board of Supervisors. Therefore, your concerns will be presented directly to the decision makers prior to consideration of Project approval.



MIRA LOMA WOMEN'S DETENTION CENTER PROJECT
PUBLIC MEETING- DECEMBER 8, 2015
6:00 TO 8:00 PM

COMMENTS:

Necesito el EIR en español para combatir con mi familia

} Benitez-1

NAME: Ravant Benitez

ADDRESS:

E-MAIL: ninib2403@yahoo.com

Ravaut Benitez

Benitez-1

English translation of Spanish comment:

I need the EIR in Spanish to share it with my family.

English Response:

The County voluntarily added additional outreach in Spanish for the MLWDC Draft EIR public review process as a result of public comments. In January 2016, a *Notice of Extended Comment Period for the Draft Environmental Impact Report for the Mira Loma Women's Detention Center Project and Notice of Second Public Meeting in Lancaster, California* was sent to the Project's mailing list and email list, as well as additional mailing list contacts that had provided comment letters during the Draft EIR public review period up to the time of the second mailing. This Notice was prepared in both English and Spanish. Additionally, the Executive Summary of the Draft EIR was translated into Spanish and posted on the County's website for viewing and downloading. Hardcopies of the Spanish-translated Executive Summary were made available at the Quartz Hill and Lancaster Libraries, as well as the Los Angeles County Public Information Office. Newspaper advertisements of the extended comment period and second public meeting were placed in the following papers and ran on Monday, February 1, 2016:

- *Acton-Aqua Dolce News*: a weekly publication so the ad was available for 7 days
- *Los Angeles Daily News*: a daily publication
- *La Opinion*: a daily publication (the ad was in both English and Spanish)
- *Antelope Valley Press*: a daily publication
- *Antelope Valley Times*: an online publication

A second public meeting was held on Tuesday, February 9, 2016 at the Lancaster Public Library at 601 West Lancaster Boulevard in Lancaster, CA 93534 to present an overview of the proposed Project and the Draft EIR process and conclusions, and to invite submission of public comments on the Draft EIR. Real-time Spanish translation services were made available, as were copies of the Notice and the Executive Summary in both English and Spanish. Two members of the public attended that meeting and neither requested Spanish translation services.

Spanish translation of English response:

El Condado agregó voluntariamente el alcance adicional en español para el proceso de revisión pública del EIR Borrador del MLWDC como resultado de los comentarios públicos. En enero de 2016, se envió una *Notificación del período extendido para comentarios del Informe de impacto ambiental borrador para el Proyecto del Centro de detención femenino Mira Loma y Notificación de la segunda reunión pública en Lancaster, California* a la lista de correo y lista de correo electrónico del Proyecto, así como también a contactos de listas de correo adicionales que habían enviado cartas con comentarios durante el período de revisión pública del EIR Borrador hasta el momento del segundo envío de correos. Esta Notificación fue redactada en inglés y en español. Además, el Resumen Ejecutivo del EIR Borrador fue traducido al español y publicado en el sitio web del Condado, en donde podía ser leído y descargado. Copias físicas del Resumen Ejecutivo traducido al español se pusieron a disposición en las Bibliotecas de Quartz Hill y Lancaster, así como también en la Oficina de Información Pública del Condado de Los Ángeles. Se publicaron anuncios del período extendido para comentarios y de la segunda reunión pública en los siguientes periódicos, desde el lunes 1 de febrero de 2016:

- *Acton-Aqua Dolce News*: una publicación semanal, por lo que el anuncio estuvo disponible durante 7 días
- *Los Angeles Daily News*: una publicación diaria
- *La Opinion*: una publicación diaria (el anuncio se publico en inglés y en español)
- *Antelope Valley Press*: una publicación diaria
- *Antelope Valley Times*: una publicación en línea

Se celebró una segunda reunión pública el martes 9 de febrero de 2016 en Lancaster Public Library ubicada en 601 West Lancaster Boulevard en Lancaster, CA 93534, para presentar una descripción general del Proyecto propuesto y del proceso y conclusiones del EIR Borrador y para invitar a que se presenten comentarios públicos sobre el EIR Borrador. Hubo disponibles servicios de traducción al español en tiempo real así como también copias de la Notificación y del Resumen Ejecutivo en inglés y en español. Dos miembros del público asistieron y dicha reunión y ninguno solicitó servicios de traducción al español.



MIRA LOMA WOMEN'S DETENTION CENTER PROJECT
PUBLIC MEETING- DECEMBER 8, 2015
6:00 TO 8:00 PM

COMMENTS:

1) Why I oppose this jail on environmental grounds. 2) People in jail will be highly susceptible to Valley fever. Since 2005, thousands of California prisoners contracted the disease, and over 50 have died as a result. Yet, Valley fever is ignored in this report

Bunch-1

3) A new jail in Lancaster would mean more travel, creating more traffic & pollution. Storm water drainage and the water supply are not up to current standards. The environmental report must assess alternatives to building this jail. However the report does not look @ alternatives to

Bunch-2

Bunch-3

imprisonment that would make this jail unnecessary

Bunch-4

NAME: Evan Bunch

ADDRESS:

E-MAIL: evan.bunch@gmail.com

Evan Bunch

Bunch-1

Coccidioidomycosis, also known as Valley Fever, and its potential impact on potential future inmates and County staff is discussed in Section 4.2, Air Quality. A summary of hazards associated with the *Coccidioides* spores (i.e., the fungus that causes Valley Fever) is provided and includes trends related to Valley Fever in Los Angeles County, as inventoried and reported by the Los Angeles County Department of Public Health (LACDPH), which was consulted during the preparation of the Draft Environmental Impact Report (EIR).

The MLWDC property is not located in an area determined to be hazardous to the health of local residents or visitors to the region. The Draft EIR concludes that the potential future inmate population's temporary placement into the Antelope Valley, which includes the inmate's participation in all indoor and outdoor activities at the MLWDC, would not constitute placement into a hazardous existing environmental setting that would require mitigation. Additionally, the operation of the proposed Project would not increase the prevalence of Valley Fever spores or otherwise exacerbate an existing environmental condition. Please see response for Form Letter-5 for additional detail regarding potential Project impacts relating to Valley Fever.

Bunch-2

Regarding the commenter's concern about increased traffic, Section 4.13, Transportation and Traffic, of the Draft EIR discusses potential impacts related to Project-generated traffic. The analysis indicates that an increase in traffic volumes would not significantly impact local intersections (intersections would still operate at Level-of-Service D or better), or alternative transportation (Metrolink trains or Antelope Valley Transit Authority [AVTA] bus service), and impacts on California Department of Transportation (Caltrans) facilities would be less than significant. As discussed on page 4.13-23 and 4.13-24, the existing transit services in the area will adequately accommodate the increase of Project-generated transit trips. No mitigation is required for short-term construction or long-term operation traffic impacts.

Regarding the commenter's concern about increased air pollution, Section 4.2, Air Quality, presents the results of the emission analysis using California Emissions Estimator Model (CalEEMod) Version 2013.2.2. This computer program is used to calculate anticipated emissions associated with land development projects in California, including emissions from vehicles traveling to and from the Project site. As shown in Table 4.2-7 of Section 4.2, Air Quality, the estimated annual operational emissions due to Project-related operations would not exceed the Antelope Valley Air Quality Management District's (AVAQMD) California Environmental Quality Act (CEQA) significance thresholds, and potential impacts would be less than significant. In fact, emissions were well below the thresholds of significance. For example, carbon monoxide (CO) was the air contaminant with the highest annual rate of emission, and the Project was estimated to emit 18 tons per year, while the AVAQMD threshold of significance is 100 tons per year.

Bunch-3

Regarding the commenter's concern about stormwater drainage and water supply, Section 4.14, Utilities and Services Systems, discusses existing and proposed storm drainage infrastructure and the water demand and supply to serve the Project. Pages 4.14-19 to 4.14-20 discusses impacts related to storm drainage during construction and long-term operation. As stated in Section 4.8, Hydrology and Water Quality, Project Design Feature (PDF) HYD-1 requires that the on-site storm drainage system would comply with storm water quality and quality control

requirements under the County's Standard Urban Stormwater Management Plan (SUSMP), Low Impact Development (LID) standards, Hydrology Manual, Best Management Practices Handbook, and Green Building Standards Code. These requirements, along with Regulatory Requirement (RR) HYD-2, address potential pollutant runoff from long-term operations of the Project.

The water supply needed by the Project is estimated in the Water Supply Assessment (WSA) that was prepared for the Project. The WSA is summarized in Section 4.14, Utilities and Service Systems, and provided in Appendix G-2 of the Draft EIR. The WSA for the Project includes an evaluation of the sufficiency of the water supplies available to the water supplier to meet existing and anticipated future demands (including the demand associated with the Project) over a 20-year horizon that includes normal, single-dry, and multiple-dry years. Pages 4.14-20 to 4.14-30 discuss the availability of water supplies to meet demands from the Project.

Bunch-4

This comment alleges that the Draft EIR must assess alternatives to the Project, including alternatives to building a jail. The Draft EIR, in fact, addresses alternatives in accordance with CEQA (*California Public Resources Code*, Sections 21000 et seq.) and the State CEQA Guidelines (14 *California Code of Regulations* [CCR]). As demonstrated in Section 5.0, Project Alternatives, an EIR must describe a range of reasonable and of potentially feasible alternatives to the proposed Project, or to the location of the Project, which would feasibly attain most of the basic Project Objectives but would avoid or substantially lessen any significant effects. Based on the analyses in Sections 4.1 through 4.15 of the Draft EIR, the proposed Project would result in significant environmental effects prior to mitigation on a number of environmental topics. Following mitigation, however, impacts to all of these topical areas would be avoided or reduced to less than significant levels with the implementation of mitigation measures. No significant and unavoidable impacts would occur with the Project.

In addition, the Board of Supervisors has adopted numerous recent actions to reduce the number of people who are incarcerated in Los Angeles County, particularly those with mental illness and/or substance use disorders. The Board of Supervisors' 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 in a document entitled "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".

The Criminal Justice Mental Health Advisory Board report of August 2015 concluded that even with increased opportunities for diversion from a jail environment, there will still be a need for mental health treatment in jails, and that diversion efforts can reduce, but will not eliminate, the need for the County to operate detention facilities. In light of the County's diversion efforts, the Board of Supervisors directed that, for purposes of on-going study and evaluation in the environmental review process, the maximum size of the proposed women's detention center at Mira Loma in Lancaster would remain at 1,604 beds. In addition the Board of Supervisors reduced the maximum proposed size by approximately 1,000 beds, for purposes of the environmental review of a separate proposed treatment and detention center addressing needs of incarcerated men and women with mental illness and/or substance use disorders at the site of the current Men's Central Jail in downtown Los Angeles. In summary, the Board of Supervisors has taken steps to reduce the number of people who are incarcerated in Los Angeles County.

In addition, please see the more detailed response on this issue in the response to Form Letter-1 regarding County actions relating to diversion and other out-of-custody alternatives, which is included in Section 2.3.1 of this Final EIR.



Mira Loma Women's Detention Center Project
Public Meeting - February 9, 2016
6:00 PM to 8:00 PM

COMMENTS:

Please put me on the mailing list

} Cabta-1

Name: WENDY CABTA
Address: 7515 JADE CT, Lancaster, CA 93536
E-Mail: wendycabta@att.net

Wendy Cabta

Cabta-1

As requested, the commenter has been added to the public notice list for this Project. The Final EIR will be posted with the Draft EIR on the County's website at: <ftp://dpwftp.co.la.ca.us/pub/PMD/MiraLomaWomenFacility>.

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



MIRA LOMA WOMEN'S DETENTION CENTER PROJECT
PUBLIC MEETING- DECEMBER 8, 2015
6:00 TO 8:00 PM

COMMENTS:

Children & their families will be severely affected if you move the women's jail to Lancaster. The cost in travel to the rural area of Los Angeles County will create a hardship for many children who have their mother/family member in the women's jail. In addition, it is unethical, deplorable and a complete violation of human rights to build on toxic land where the proposed site is considered. I ask that you not vote to build this site or funnel funds for more jails.

Camacho-Rodriguez-1

Camacho-Rodriguez-2

Camacho-Rodriguez-3

NAME:

Martha Camacho-Rodriguez (Member of Dignity & Power Now / Compton Youth Coalition)

ADDRESS:

9402 Pellet St. Downey, CA 90241

E-MAIL:

mmmmmrtha@gmail.com

Martha Camacho-Rodriguez

Camacho-Rodriguez-1

The Draft Environmental Impact Report (EIR) acknowledges that increased driving distances would be required for some families with the Project due to the location of the site in relation to the Century Regional Detention Facility (CRDF) in Lynwood, which is closer to higher density urban areas near the City of Los Angeles. The County is aware of the potential challenges this increased distance may pose for some visiting family members, while for other visiting family members from the Lancaster and other County areas, the Project location will be closer to their homes than the current women's jail in Lynwood. As demonstrated on page 3-4, in Section 3.0, Project Description, the Board of Supervisors directed the establishment of an Advisory Board (now called the Gender Responsive Advisory Committee) that will report to the Board of Supervisors on specific programmatic and operational issues. The Advisory Committee has already begun to organize its meetings with a membership including representatives of County staff, outside agencies, advocates, organizations, individuals with incarceration experience, and representatives with expertise in reducing recidivism of female inmates. As part of its charge, the Advisory Committee is tasked with reviewing the program model for the proposed MLWDC Project to ensure that it is evidence-based in reducing recidivism; evaluating strategies to reduce negative impacts of operating the proposed MLWDC away from the downtown Los Angeles area, including contract transportation for visitors, video visiting for attorney consultation; and reviewing national best practices for visiting and family reunification.

Camacho-Rodriguez-2

Regarding the commenter's concern that the Project would be located on toxic land, the Project site was never operated as a site that accepted hazardous wastes for disposal. The Project site is on the list of Leaking Underground Storage Tanks (LUST) Sites, but the leaking underground storage tanks have been removed and the affected area cleaned up. The County Department of Public Works oversaw the remediation and issued the "no further action" letter. The California Department of Toxic Substances Control (DTSC) lists the Polaris Flight Academy with a status of "inactive-needs evaluation". As part of the Phase II Environmental Site Assessment (ESA), soil borings collected in the area of the possible former location of the airstrip did not detect any contaminants that would require further action (Converse 2015). Thus, the listing of the site in government databases was based on past uses that no longer pose hazards.

As part of the environmental analysis for the Draft EIR, a Phase I ESA has been prepared that reviewed past and current uses and site conditions and identified Recognized Environmental Concerns (RECs) on the Project site and surrounding area. The Phase I ESA is provided in Appendix E-1 of the Draft EIR. Subsequent to the Phase I ESA, a Phase II ESA was prepared that included soil sampling to determine if soil contamination is present on the site. The Phase II ESA is provided in Appendix E-3 of the Draft EIR. In addition, an Asbestos and Lead Based Paint Survey Report was completed to identify the building components that contained asbestos and lead-based paint. The Asbestos and Lead Based Paint Survey Report is provided in Appendix E-2 of the Draft EIR. These reports are summarized in Section 4.7, Hazards and Hazardous Materials of the Draft EIR.

The Project must comply with existing regulatory requirements (RRs) for the proper handling of hazardous wastes, including transportation, treatment, storage, and disposal; repair and/or removal of underground storage tanks based on applicable standards; and practices that would protect the demolition and construction crews from asbestos and lead exposure. In addition, the Project must incorporate mitigation measures (MMs) for the handling of suspected asbestos-

containing materials and lead-based paint; an Operations and Maintenance Plan for regular inspection of any asbestos-containing materials; and testing and repair of underground storage tanks prior to use. Thus, existing hazardous materials and wastes would be removed from the Project site and future hazardous materials use would comply with applicable regulations to prevent hazards to future inmates. In summary, compliance with RRs and implementation of MMs set forth in the Draft EIR would prevent public health and safety hazards to inmates, employees, visitors and other individuals at the Project site.

Camacho-Rodriguez-3

This comment relates to the merits of the proposed Project, and not the environmental analysis included in the Draft EIR or the environmental impacts of the Project. This Final EIR, including all comments submitted to the County on the Draft EIR, will be provided to the County of Los Angeles Board of Supervisors. Therefore, your concerns will be presented directly to the decision makers prior to consideration of Project approval.



MIRA LOMA WOMEN'S DETENTION CENTER PROJECT
PUBLIC MEETING- DECEMBER 8, 2015
6:00 TO 8:00 PM

COMMENTS:

I oppose the new prison complex project.

Carrillo-1

NAME:

Vicente Carrillo

ADDRESS:

2019 Miramar Blvd. 90404

E-MAIL:

carrillo3713@yahoo.com

Vicente Carrillo

Carrillo-1

This comment expresses opposition to the "new prison complex project" without further specifics. This Final EIR, including all comments submitted to the County on the Draft EIR, will be provided to the County of Los Angeles Board of Supervisors. Therefore, your concerns will be presented directly to the decision makers prior to consideration of Project approval.



MIRA LOMA WOMEN'S DETENTION CENTER PROJECT
PUBLIC MEETING- DECEMBER 8, 2015
6:00 TO 8:00 PM

COMMENTS:

Will there be design strategies to reduce the likelihood, or to eliminate the possibility of rape against prisoners in these facilities?

Chesney-1

NAME:

Peter Chesney

ADDRESS:

mrpchesney@gmail.com

E-MAIL:

1928 Melwood Dr Glendale CA 91207

Peter Chesney

Chesney-1

The comment asks whether there will be design features to prevent rape of inmates in the facility. All Sheriff's Department personnel receive gender specific training with regard to the care and treatment of female inmates, including the prevention of crime incidence.

Further, the design of the facility promotes the safety of both inmates and staff by maintaining lighting, sight lines and security procedures, in compliance with applicable correctional standards. Examples of physical design items which address issues of privacy include partitions at toilet and showering facilities. Also, as a part of this project, the design criteria requires a video monitoring system with cameras and recording storage to monitor activity within the facility.



MIRA LOMA WOMEN'S DETENTION CENTER PROJECT
PUBLIC MEETING- DECEMBER 8, 2015
6:00 TO 8:00 PM

COMMENTS:

Building prisons as ~~opposed~~ opposed
to focusing on building sustainable communities
undermines the core values of U.S. Democracy.
Funding a facility to house more incarcerated people
could better serve communities by building
housing units and healthy communities.

Christopher-

1

NAME:

Justin Chazell

ADDRESS:

E-MAIL:

 jchristopher@gmail.com

Justin Christopher

Christopher-1

This comment alleges that the building of prisons instead of healthy communities "undermines the core values" of our democracy. This comment relates to the merits of the proposed Project and purely social effects of a project are beyond the scope of CEQA analysis, which focuses on the proposal's effect on the physical environment. This Final EIR, including all comments submitted to the County on the Draft EIR, will be provided to the County of Los Angeles Board of Supervisors. Therefore, your concerns will be presented directly to the decision makers prior to consideration of Project approval.

From: Karen Limón Corrales <karenglimon@gmail.com>
Sent: Wednesday, February 03, 2016 12:21 PM
To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental;
lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-
Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov;
FifthDistrict@lacbos.org
Subject: Attn: Mira Loma Women's Jail Environmental Impact Report

Dear LA County Chief Exec Office and Board of Supervisors,

As a member of the LA community, I oppose the building of the new Mira Loma Jail because of its harmful effects on the physical and mental health of LA residents as well as the local environment. Building a new LA county jail in Lancaster will worsen traffic pollution, degrade LA's natural resources, and increase the distance between inmates and their families, negatively affecting their success after release and increasing the likelihood of recidivism. The proposed jail should be rejected and the Draft EIR must not be approved, as community based alternatives, including diversion, bail/bond reform, and other jail population reduction measures, have not been adequately acknowledged.

Corrales-1

--
Karen Limón Corrales
karenglimon@gmail.com
1151 W Arrow Hwy, Apt. G-72
Azusa, California 91702

Karen Limón Corrales (February 3, 2016)

Corrales-1

To the extent that this comment raises concerns regarding the merits of the proposed Project, this Final EIR, including all comments submitted to the County on the Draft EIR, will be provided to the County of Los Angeles Board of Supervisors. Therefore, your concerns will be presented directly to the decision makers prior to consideration of Project approval.

Regarding the commenter's concerns about building a new jail, the Board of Supervisors has adopted numerous recent actions to reduce the number of people who are incarcerated in Los Angeles County, particularly those with mental illness and/or substance use disorders. The Board of Supervisors' 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 in a document entitled "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".

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 Countywide Criminal Justice Coordination Committee. All Advisory Board members participated in the Countywide 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 of Los Angeles Chief Executive Office (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 Re-Entry (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 of Supervisors determined the Office will be a part of the Department of Health Services and the Director of the Office will report to the Director of the Department of Health Services. The Director of this Office will be 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, the Superior Court, the Public Defender, the Alternate Public Defender, Probation, the District Attorney, Mental Health, Public Health, and Health Services.

The Office will oversee Countywide diversion efforts including a system of integrated mental, physical and public health care services and 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 of Supervisors directed that future budget allocations be a part of the annual budget process. On September 1, 2015, the Board of Supervisors also directed that the Office distribute funding so at least 1,000 individuals would be diverted across all intercept points within the criminal justice system.

The Criminal Justice Mental Health Advisory Board report of August 2015 concluded that, even with increased opportunities for diversion from a jail environment, there will still be a need for mental health treatment in jails, and that diversion efforts can reduce, but will not eliminate, the need for the County to operate detention facilities. In light of the County's diversion efforts, the Board of Supervisors directed that, for purposes of ongoing study and evaluation in the environmental review process, the maximum size of the proposed women's detention center at Mira Loma in Lancaster would remain at 1,604 beds. In addition, the Board of Supervisors reduced the maximum proposed size by approximately 1,000 beds, for purposes of the environmental review of a separate proposed treatment and detention center addressing needs of incarcerated men and women with mental illness and/or substance use disorders at the site of the current Men's Central Jail in downtown Los Angeles. In summary, the Board of Supervisors has taken steps to reduce the number of people who are incarcerated in Los Angeles County.

Regarding the commenter's concern about increased traffic, Section 4.13, Transportation and Traffic, estimates the trip generation of the Project, which includes all trip types (i.e., staff and employees, service, and inmate visitation trips) and discusses potential impacts related to Project-generated traffic. The analysis indicates that an increase in traffic volumes would not significantly impact local intersections (intersections would still operate at Level of Service D or better), or alternative transportation (Metrolink trains or Antelope Valley Transit Authority [AVTA] bus service), and impacts on California Department of Transportation (Caltrans) facilities would be less than significant. As discussed on page 4.13-23 and 4.13-24, the existing transit services in the area will adequately accommodate the increase of Project-generated transit trips. No mitigation is required for short-term construction or long-term operation traffic impacts because they have been determined to be less than significant without mitigation.

This comment generally alleges that the Project will degrade Los Angeles' natural resources. The Draft EIR for the proposed Project has been prepared in accordance with the California Environmental Quality Act (CEQA, *California Public Resources Code*, Sections 21000 et seq.) and the State CEQA Guidelines (14 *California Code of Regulations* [CCR]), and addresses the potential direct, indirect, and cumulative impacts of the Project on all environmental issue areas. Section 5.0, Project Alternatives, was prepared in accordance with Sections 15126.6(a) through 15126.6(f) of the State CEQA Guidelines. As demonstrated throughout the Draft EIR, all potentially significant impacts have been reduced to levels that are less than significant through the identified mitigation measures, and no significant unavoidable environmental impacts would result from Project implementation.

The Draft EIR acknowledges that increased driving distances would be required for some families with the Project due to the location of the site in relation to the Century Regional Detention Facility (CRDF) in Lynwood, which is closer to higher density urban areas near the City of Los Angeles. The County is aware of the potential challenges the increased distance may pose for some visiting family members, while for other visiting family members from the Lancaster and other County areas, the Project location will be closer to their homes than the current women's jail in Lynwood.

As demonstrated on page 3-4, in Section 3.0, Project Description, the Board of Supervisors directed the establishment of an Advisory Board (now called the Gender Responsive Advisory Committee) that will report to the Board of Supervisors on specific programmatic and operational issues. The Advisory Committee has already begun to organize its meetings with a membership including representatives of County staff, outside agencies, advocates, organizations, individuals with incarceration experience, and representatives with expertise in reducing recidivism of female inmates. As part of its charge, the Advisory Committee is tasked with reviewing the program model for the proposed MLWDC Project to ensure that it is evidence-based in reducing recidivism; evaluating strategies to reduce negative impacts of operating the proposed MLWDC away from the downtown Los Angeles area, including contract transportation for visitors, video visiting for attorney consultation; and reviewing national best practices for visiting and family reunification.

The EIR for the MLWDC has been prepared and processed in accordance with CEQA and the State CEQA Guidelines. As demonstrated throughout the Draft EIR, all potentially significant impacts have been reduced to levels that are less than significant through the identified mitigation measures, and no significant unavoidable environmental impacts would result from Project implementation.

Regarding the commenter's concerns about alternatives to jails, the purpose of and need for the Project is described in detail in Section 3.1, Project Background, of the Draft EIR. That section provides information regarding the County's existing detention facilities, relevant regulatory mandates, and studies analyzing future facility needs, including for housing of female inmates. The Draft EIR Section 5.0, Project Alternatives, was prepared in accordance with Sections 15126.6(a) through 15126.6(f) of the State CEQA Guidelines and adequately considers alternatives to the proposed Project. Out-of-custody alternatives were not required to be analyzed in the Draft EIR beyond the No Project alternative analyses and they would not be able to achieve the Project's primary goal.

The proposed jail planning is set in the context of the County's other programmatic and financial support of diversion from incarceration. The County has a concurrent focus on diversion from incarceration as it considers this Project. Therefore, the proposed Project is consistent with the Board of Supervisor's consideration of policy issues addressing alternative approaches to incarceration, including community based alternatives, diversion, bail/bond reform, and other jail population reduction measures, as discussed above at the beginning of this response.

From: Craig Courtney <ccourtney569@earthlink.net>
Sent: Wednesday, February 17, 2016 4:30 PM
To: CEO Environmental
Cc: Larry Driscoll; Monica Courtney; <rcrcmayer@roadrunner.com>; Melissa Courtney; Norma; bcourtney569@yahoo.com; Diana Zuniga; info@youth4justice.org
Subject: Mira Loma Women's Detention Center (MLDC) Project

Attn: County of LA CEO

Let it be known that I am completely and unequivocally opposed to the MLDC expansion to provide 1,604 beds for low- to medium security female inmates. } Courtney-1

I do not want my taxpayer dollars spent on an incarceration facility to warehouse women. What these women likely need much more is education, career training, counseling, and learning resources in a constructive and supportive environment, rather than a prison. } Courtney-2

My organization promotes community and family values. Many of these women have children who need their mother. Spend our taxpayer money on giving these women the tools so they can reunite with their families. } Courtney-3

Sincerely,
Craig Courtney
Conservatives for Social Change

Craig Courtney (February 17, 2016)

Courtney-1

This introductory comment expresses strong opposition to the proposed project and relates to the merits of the proposed Project and not the environmental analysis included in the Draft Environmental Impact Report (EIR) or the environmental impacts of the Project. This Final EIR, including all comments submitted to the County on the Draft EIR, will be provided to the County of Los Angeles Board of Supervisors. Therefore, your concerns will be presented directly to the decision makers prior to consideration of Project approval.

Courtney-2

The purpose of and need for the Project is described in detail in Section 3.1, Project Background, of the Draft EIR. That section provides information regarding the County's existing detention facilities, relevant regulatory mandates, and studies analyzing future facility needs, including for housing of female inmates.

The Draft EIR addresses the goal of the project to provide education and training in a supportive environment for eligible low to moderate security level women inmates to reduce recidivism. Section 3.0, Project Description, of the Draft EIR states that the Project will offer general education classes, computer training, general and vocational career technical education, college courses, career counseling, a learning resource center, a library and computer labs, culinary classes, and indoor/outdoor recreation for inmates. Other services include religious services, counseling services, and community transition services.

Course selections will be determined based on their needs for specific services and students' interest levels. Courses will be offered during three blocks of time each weekday (morning, afternoon, and evening), providing opportunities for inmates to be enrolled in multiple courses. Programs are also divided into three categories based on program intensity: all-day, half-day, and evening programs. Examples of all-day programs (morning and afternoon) include culinary arts programs, cosmetology programs, and Prisoner Assisted Community Enhancement (PACE). Examples of half-day programs (morning or afternoon) include small engine repair, animal grooming/training, social media management and marketing/office assistant, automotive detailing, windshield and headlight repair, and recycling. Examples of evening programs include computer coding, small business entrepreneurship, community college, Associate of Arts Degree, and General Education. Other programs include prenatal programs, volunteer programs, peer mentoring, physical education, dance, arts and crafts, a commissary program, and book clubs.

Courtney-3

This comment relates to the merits of the proposed Project, and not the environmental analysis included in the Draft EIR or the environmental impacts of the Project. This Final EIR, including all comments submitted to the County on the Draft EIR, will be provided to the County of Los Angeles Board of Supervisors. Therefore, your concerns will be presented directly to the decision makers prior to consideration of Project approval.

The Board of Supervisors has addressed the importance of education programming and family reunification goals for women inmates at the proposed project. As stated in the Project Objectives in Section 3.0, Project Description, the MLWDC Project would prioritize the on-site integration of gender-responsive female inmate education, treatment, and vocational training to reduce female inmate recidivism. The Project would reduce recidivism through programming and development

of a women's detention facility at a site with sufficient space to accommodate both campus-style inmate housing and support facilities for education and vocational training, implementing the best practices of Education Based Incarceration (EBI). Therefore, contrary to the commenter's concern that inmates and their families are "being treated as disposable", the proposed MLWDC Project would prioritize cost-effective therapeutic and rehabilitative programs and promote release-readiness and community reintegration in order to reduce recidivism.

From: R Crotty <rosaleencrotty@yahoo.com>
Sent: Friday, February 12, 2016 7:27 AM
To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental;
lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-
Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov;
FifthDistrict@lacbos.org
Subject: Attn: Mira Loma Women's Jail Environmental Impact Report

Dear LA County Chief Exec Office and Board of Supervisors,

Dear Sir or Madam,

I ask that you take my comment into consideration on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

I am extremely concerned that a new LA county jail is being considered in Lancaster on a site that is a known "hazardous waste site".

In addition there are two underground storage tanks that have not past the leak detection tests, this would mean there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area".

This puts everyone at risk: prisoners, employes and visitors at the jail, others in custody of the County of Los Angeles etc all extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current residents.

In addition to that, this area is a likely hot spot for "Valley Fever", the fungal disease that can result in death.

If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

So if a jail is built on this site in spite of all these KNOWN environmental hazards, people will very likely suffer health problems in the future. This could make LA County vulnerable to being sued for medical damages.

For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

--
R Crotty
rosaleencrotty@yahoo.com
4 74 48 Ave
LIC, NY 11109
None

} Crotty-1
}
} Crotty-2
}
} Crotty-3
}
} Crotty-4
}
} Crotty-5

R Crotty (February 12, 2016)**Crotty-1**

Regarding the commenter's concern about hazardous materials, the Project site is listed in government databases due to past hazardous material uses. However, the Project site was never operated as a site that accepted hazardous wastes for disposal. The Project site is on the list of Leaking Underground Storage Tanks (LUST) Sites, but the leaking underground storage tanks have been removed and the affected area cleaned up. The County Department of Public Works oversaw the remediation and issued the "no further action" letter. The California Department of Toxic Substances Control (DTSC) lists the Polaris Flight Academy with a status of "inactive-needs evaluation". As part of the environmental assessment conducted for the Project, soil borings collected in the area of the possible former location of the airstrip did not detect any contaminants that would require further action (Converse 2015). Thus, the listing of the site in government databases was based on past uses that no longer pose hazards.

As part of the environmental analysis for the Draft Environmental Impact Report (EIR), a Phase I Environmental Site Assessment (ESA) has been prepared that reviewed past and current uses and site conditions and identified Recognized Environmental Concerns (RECs) on the Project site and surrounding area. The Phase I ESA is provided in Appendix E-1 of the Draft EIR. Subsequent to the Phase I ESA, a Phase II ESA was prepared that included soil sampling to determine if soil contamination is present on the site. The Phase II ESA is provided in Appendix E-3 of the Draft EIR. In addition, an Asbestos and Lead Based Paint Survey Report was completed to identify the building components that contained asbestos and lead-based paint. The Asbestos and Lead Based Paint Survey Report is provided in Appendix E-2 of the Draft EIR. These reports are summarized in Section 4.7, Hazards and Hazardous Materials of the Draft EIR.

The Project must comply with existing regulatory requirements (RRs) for the proper handling of hazardous wastes, including transportation, treatment, storage, and disposal; repair and/or removal of underground storage tanks based on applicable standards; and practices that would protect the demolition and construction crews from asbestos and lead exposure. In addition, the Project must incorporate mitigation measures (MMs) for the handling of suspected asbestos-containing materials and lead-based paint; an Operations and Maintenance Plan for regular inspection of any asbestos-containing materials; and testing and repair of underground storage tanks prior to use. Thus, existing hazardous materials and wastes would be removed from the Project site and future hazardous materials use would comply with applicable regulations to prevent hazards to future inmates. In summary, compliance with RRs and implementation of MMs set forth in the Draft EIR would prevent public health and safety hazards to inmates, employees, visitors and other individuals at the Project site.

Crotty-2

As stated on page 4.7-19 of the Draft EIR, the existing fueling station is located outside the Project site boundary, but may be used by the Project. This fueling station has two USTs that previously failed leak detection tests. As shown in the California Environmental Reporting System (CERS) database and the Monitoring System Certification by AW Associates in Appendix E to this Final EIR, the tank permits were updated in 2015 and have passed subsequent leak detection tests and are now in compliance. Soil testing also indicated there is no soil contamination near the USTs (Converse 2016b). MM HAZ-3 requires the testing and repair, as necessary, of the USTs prior to the use of the existing fueling station by the Project.

The Phase II ESA included 14 soil borings to depths of 8 feet below the ground surface (bgs). All soil samples from two and four feet bgs were analyzed for Total Petroleum Hydrocarbons (TPH), Volatile Organic Compounds (VOCs), and metals in accordance with U.S. Environmental Protection Agency (USEPA) Test Methods 8015M, 8260B, and 6010B/7471A, respectively. As stated on page 4.7-18 of the Draft EIR, the soil analyses indicate that no VOCs are present in the soil samples. All reported metals, except arsenic, were found to be at levels below the California Human Health Screening Levels (CHHSLs) for both residential and commercial/industrial land. The arsenic levels are below the background level of the 12 milligrams per kilogram (mg/kg) level that the DTSC has determined to be naturally occurring background levels at school sites in California. The findings of the Phase II ESA indicated that there is no soil contamination on the site (Converse 2015). With no contamination on near-surface soils, it is unlikely that groundwater contamination would be present, considering that groundwater levels in the Antelope Valley Groundwater Basin in 2006 were estimated at 120 feet bgs at the Project site (RWMG 2013).

The Draft EIR concludes that the Project's impacts to hazardous materials would be less than significant because there is no soil or groundwater contamination on the Project site; because existing hazardous materials in various buildings would be removed, transported, and disposed of in accordance with existing regulations; because MMs would be implemented for the handling of remaining materials that may contain asbestos and lead-based paint and these MMs would be implemented for the reuse of other facilities near the Project site; and because the use, storage, handling, transport and disposal of hazardous materials during operation of the MLWDC would be made in compliance with existing regulations. Therefore, female inmates, including pregnant inmates and their unborn children, would not be exposed to health hazards or lifelong health effects from their stay at the MLWDC.

The Project's projected water usage is addressed in Section 4.14, Utilities and Service Systems. The Project's estimated water demand is less than the 250 acre-feet per year (afy) threshold established by the California Department of Water Resources (DWR) for requiring a Water Supply Assessment (WSA) for the proposed Project under legislation commonly referred to as Senate Bill (SB) 610, as described further in Section 4.14 of the Draft EIR. Nonetheless, to provide informed decision-making, a WSA was prepared for the Project and provided in Appendix G-2 of the Draft EIR. The WSA is also summarized in Section 4.14. As required under SB 610, the WSA must include an evaluation of the sufficiency of the water supplies available to the water supplier to meet existing and anticipated future demands (including the demand associated with the project) over a 20-year horizon that includes normal, single-dry, and multiple-dry years. The multiple-dry year scenario would represent drought conditions. With implementation of MM UTL-1, the Los Angeles County Waterworks District No. 40 (LACWWD 40), which will be the Project's water supplier, would have the water supply needed to serve the Project. MM UTL-1 requires that the County sign the New Water Supply Entitlement Acquisition Agreement with LACWWD 40 and pay a deposit of \$10,000 per acre-foot of annual water demand from the Project for the acquisition of additional water supplies from Antelope Valley – East Kern Water Agency (AVEK) to serve the Project.

With implementation of MM UTL-1, Project-related estimates for water supply and demand, as provided in the WSA, show that water supply is available to serve the Project during the average year, single-dry year, and multiple-dry years. The WSA concludes the information on record indicates a sufficient and reliable water supply for LACWWD 40, now and into the future, including a sufficient water supply for the Project (Psomas 2015). These supplies are also sufficient to provide for existing demands and demands from overall growth in the LACWWD 40 service area at the rate projected in the 2010 Integrated Regional Urban Water management Plan (IRUWMP) (LACWWD 40 2011).

Crotty-3

Coccidioidomycosis, also known as Valley Fever, and its potential impact on potential future inmates and County staff is discussed in Section 4.2, Air Quality. A summary of hazards associated with the fungus is provided in the Draft EIR and includes summaries of trends related to Valley Fever in Los Angeles County, as inventoried and reported by the Los Angeles County Department of Public Health (LACDPH), which was consulted during the preparation of the Draft EIR.

As stated in RR AIR-2, the Project will be constructed in compliance with the Department of Health – Infection Control Policy Guidelines Procedure No. 918.01. Policy 918 is intended to prevent the spread of diseases that may be caused by construction-induced airborne pollution in susceptible individuals (patients, staff, and the public) in Department of Health Services (DHS) facilities. The protocols and requirements include the designation of an Infection Control Coordinator who must review and approve infection-control plans for new construction or renovation projects to ensure a safe environment. These infection-control plans must include infection-control measures to contain dust, debris, and other elements and to protect the patients, employees, and visitors in this environment. The Infection Control Coordinator has independent authority to stop construction-related activities immediately when the public may be adversely affected by infection-control hazards generated during construction-related activities and when the infection-control precautions and/or engineering controls are inadequate to contain the hazard. As such, the Draft EIR states that exposure to Valley Fever during construction activities would be the same as exposure to dust, and, thus, should follow the requirements for the mitigation of dust. Impacts would be less than significant, and no mitigation is required.

Section 4.2, Air Quality, acknowledges that the future inmate population has the potential to be exposed to dust generated from soils within the Antelope Valley, which have the potential to contain *Coccidioides* spores (i.e., the fungus that causes Valley Fever). As discussed in Section 3.0, Project Description, of the Draft EIR, according to the Los Angeles County Sheriff's Department, Assembly Bill (AB) 109 female inmates are serving an average of 423 days in custody from date of sentencing to date of release, while non-AB 109 female inmates serve an average of 107 days in custody. Therefore, the length of time that inmates would be living at the MLWDC is temporary, and is not equivalent to a permanent living circumstance or the longer sentences in state prisons that house higher-security inmates.

The Draft EIR summarizes the LACDPH *2013 Annual Morbidity Report*, which presents the recent trends related to Valley Fever in Los Angeles County, including and increasing incidence rate for reported coccidioidomycosis cases within the last ten years. However, the overall incidence rate in the Antelope Valley was not determined to warrant changes in the County's protocol for disease prevention, notwithstanding the fact that the County health and public health officials are well educated on the condition; are familiar with its incidence in the County and elsewhere in the state; and are involved in research and education on the subject of Valley Fever.

The LACDPH has not identified the previous U.S. Immigration and Customs Enforcement (ICE) detainee population at the Mira Loma Detention Center (MLDC), the future inmate population at the MLWDC, or earlier occupants at the High Desert Health System (HDHS) Multi-Ambulatory Care Center (MACC) (the adjacent hospital facility, which has relocated in Lancaster) as requiring the implementation of health screening protocols or other measures to address potential Valley Fever exposure.

Also, as demonstrated in Section 4.2, Air Quality, the California Department of Corrections and Rehabilitation (CDCR) has not identified the Lancaster area as being a geographic location that

requires screening or interventions for the State prison population with regard to exposure to Valley Fever (CDCR 2013). As discussed with the Sheriff's Department staff for the preparation of the Draft EIR, the operation of the MLWDC will follow standard Sheriff's Department procedures for medical care and prevention with regard to health care for inmates in general, and Valley Fever specifically, and the Sheriff's Department will continue to coordinate with the LACDPH (Masis 2015). The LACDPH is the designated County agency with the mandate to protect health, prevent disease, and promote the health and well-being of all persons within Los Angeles County. As such, any future changes in LACDPH policies that may be made regarding Valley Fever for inmate populations will be implemented, as applicable, throughout the County jail system.

Because the future inmate population's exposure to disturbed soils would be limited to gardening activities, PDF AIR-3 in Section 4.2, Air Quality, states that the Project will import gardening soils from outside of the Antelope Valley and would be used in raised planting beds to remove gardening in native soil as a potential source of exposure to Valley Fever spores. Further, outdoor recreational areas would be covered with landscaping, turf grass, gravel or landscaping/wood chip ground cover that would minimize the opportunity for soils to become airborne.

The Antelope Valley has not been identified by the LACDPH, the Antelope Valley Air Quality Management District (AVAQMD), or any other governmental health agency as a region that should be avoided by the elderly, women, children, health-compromised individuals, or by any specific ethnic groups. The Antelope Valley includes the major population centers of the cities of Lancaster and Palmdale, which have an estimated 2014 combined population of approximately 314,902 people. This portion of the Antelope Valley includes a diverse population of residents that includes many individuals that could be considered to be at higher risk of complications due to infection from Valley Fever spores. As stated in Section 4.2, Air Quality, persons at the highest risk of developing disseminated Valley Fever include the very young (under 1 year old); adults over 60 years; immunocompromised individuals; people with diabetes; women in the third trimester of pregnancy; and certain ethnic groups, including African-Americans and Filipinos.

The demographics of the two cities include approximately 158,605 females (50.4 percent) and 156,297 males (49.6 percent) with a median age of approximately 30.7 years old. The racial/ethnic composition of the area is approximately 47 percent Latino, 29 percent white, 17 percent African American, and 4 percent Asian (U.S. Census Bureau 2016). As such, the temporary presence of a female inmate population into the Antelope Valley would not introduce a new or unusual demographic into the area that is not already present in the existing population of the region.

The MLWDC property is not located in an area determined to be hazardous to the health of local residents or visitors to the region. The Draft EIR concludes that the potential future inmate population's temporary placement into the Antelope Valley, which includes the inmates' participation in all indoor and outdoor activities at the MLWDC, would not constitute placement into a hazardous existing environmental setting that would require mitigation. Additionally, the operation of the proposed Project would not increase the prevalence of Valley Fever spores or otherwise exacerbate an existing environmental condition.

Crotty-4

Please refer to responses Crotty-1 and Crotty-2 above.

Crotty-5

This Final EIR, including all comments submitted to the County on the Draft EIR, will be provided to the County of Los Angeles Board of Supervisors. Therefore, your concerns will be presented directly to the decision makers prior to consideration of Project approval.



MIRA LOMA WOMEN'S DETENTION CENTER PROJECT
PUBLIC MEETING- DECEMBER 8, 2015
6:00 TO 8:00 PM

COMMENTS:

VALU COVER AMONG OTHER HEALTH HAZARDS, THIS
IS A ISSUE EFFECTING WOMEN, MOTHERS, CHILDREN
AND THEIR FAMILIES. SEAP THE JAIL IN MIRA LOMA

Cristo-1

Cristo-2

NAME: ROBERT CRISTO

ADDRESS: _____

E-MAIL: _____

Robert Cristo

Cristo-1

Coccidioidomycosis, also known as Valley Fever, and its potential impact on potential future inmates and County staff is discussed in Section 4.2, Air Quality. A summary of hazards associated with the *Coccidioides* spores (i.e., the fungus that causes Valley Fever) is provided, as well as summaries of trends related to Valley Fever in Los Angeles County, as inventoried and reported by the Los Angeles County Department of Public Health (LACDPH), which was consulted during the preparation of the Draft Environmental Impact Report (EIR).

The MLWDC property is not located in an area determined to be hazardous to the health of local residents or visitors to the region. The Draft EIR concludes that the potential future inmate population's temporary placement into the Antelope Valley, which includes the inmate's participation in all indoor and outdoor activities at the MLWDC, would not constitute placement into a hazardous existing environmental setting that would require mitigation. Additionally, the operation of the proposed Project would not increase the prevalence of Valley Fever spores or otherwise exacerbate an existing environmental condition.

In addition, please see the more detailed response on this issue in the response to Form Letter-5 relating to Valley Fever, which is included in Section 2.3.1 of this Final EIR.

Cristo-2

This comment relates to the merits of the proposed Project, and not the environmental analysis included in the Draft Environmental Impact Report (EIR) or the environmental impacts of the Project. This Final EIR, including all comments submitted to the County on the Draft EIR, will be provided to the County of Los Angeles Board of Supervisors. Therefore, your concerns will be presented directly to the decision makers prior to consideration of Project approval



MIRA LOMA WOMEN'S DETENTION CENTER PROJECT
PUBLIC MEETING- DECEMBER 8, 2015
6:00 TO 8:00 PM

COMMENTS:

What are your specific plans to deal with the incarcerated women in your prison who are pregnant and/or mothers? How will you ensure that these women will have present, positive relationships with their children? Do you condone shackling during child birth? How can you ensure these women will have safe pregnancies?

de Hinojosa-1

de Hinojosa-2

de Hinojosa-3

NAME: ALANA DE HINOJOSA

ADDRESS: _____

E-MAIL: _____

Alana de Hinojosa

de Hinojosa-1

The proposed MLWDC will only house female inmates, so some of them will be mothers or pregnant, as is the case for the current female inmate population housed primarily at the facility in Lynwood. The Sheriff's Department has experience with inmate pregnancies and with incarcerated mothers. Care is provided by licensed professionals and consistent with modern medical standards of care. As discussed in Section 3.0, Project Description of the Draft EIR, the MLWDC will provide medical services, including a clinic staffed with licensed medical personnel 24 hours per day, 7 days per week. On-site medical practitioners will provide obstetrics, gynecological, dental, orthopedic, and dermatology services. Radiology and laboratory services will be available for diagnostic testing. The medical clinic will have multipurpose exam rooms for routine medical examinations and urgent care services.

An on-site pharmacy will be available for medication dispensing. Licensed nursing personnel will provide nurse clinics, sick call, and preventative medical care education. Rooms equipped for tele-medicine and tele-psychiatry will be available to augment on-site services. Mental health clinicians, social workers, and psychologists and psychiatrists will also be available.

Medical situations will be evaluated and handled by on-site staff or transported to the Inmate Reception Center (IRC) in downtown Los Angeles for further evaluation by the appropriate medical/mental health clinician. In the event that an inmate's medical conditions warrant a higher level of care, the medical staff will facilitate transportation to area hospitals. As discussed in Section 3.0, Project Description, of the Draft EIR, female inmates with special medical and/or mental health needs will not be housed at the MLWDC.

de Hinojosa-2

The Sheriff's Department cannot ensure positive relationships between mothers and children. The Project's goal is to provide detention facilities for low- to medium-security level female inmates that meet modern correctional standards and that prioritize the on-site integration of gender-responsive female inmate education, treatment, and vocational training. This goal focuses on providing a secure detention facility with cost-effective therapeutic and rehabilitative programs to meet needs of eligible female inmates in order to reduce recidivism. The reduction of recidivism supports families and communities.

The Draft EIR acknowledges that increased driving distances would be required for some families with the Project due to the location of the site in relation to the Century Regional Detention Facility (CRDF) in Lynwood, which is closer to higher density urban areas near the City of Los Angeles. The County is aware of the potential challenges this increased distance may pose for some visiting family members, while for other visiting family members from the Lancaster and other County areas, the Project location will be closer to their homes than the current women's jail in Lynwood. As demonstrated on page 3-4, in Section 3.0, Project Description, the Board of Supervisors directed the establishment of an Advisory Board (now called the Gender Responsive Advisory Committee) that will report to the Board of Supervisors on specific programmatic and operational issues. The Advisory Committee has already begun to organize its meetings with a membership including representatives of County staff, outside agencies, advocates, organizations, individuals with incarceration experience, and representatives with expertise in reducing recidivism of female inmates. As part of its charge, the Advisory Committee is tasked with reviewing the program model for the proposed MLWDC Project to ensure that it is evidence-based in reducing recidivism; evaluating strategies to reduce negative impacts of operating the

proposed MLWDC away from the downtown Los Angeles area, including contract transportation for visitors, video visiting for attorney consultation; and reviewing national best practices for visiting and family reunification.

Importantly, the proposed MLWDC will accommodate various forms of visitation, including traditional non-contact visiting, telephone access, video visiting, and contact visiting. Contact visits refer to opportunities for inmates and visitors to interact face to face, allowing for physical contact. Non-contact visits refer to visitations where the inmate and the visitor are separated by a glass barrier, and no physical contact is allowed. Video visits refer to long-distance visitation that can occur through a video conferencing program, allowing the inmate and the visitor to hear and see each other via the computer and screen.

de Hinojosa-3

Regarding medical care during pregnancy, please refer to the response for de Hinojosa-1.

The Sheriff's Department has policies and procedures in place regarding the treatment of pregnant female inmates and those in labor, in compliance with the California Penal Code. Specifically, California Penal Code Section 6030(f) states that at no time shall a woman who is in labor be shackled by the wrists, ankles, or both including during transport to a hospital, during delivery, and while in recovery after giving birth, except as provided in Section 5007.7 (which states that an inmate may not be shackled after they are declared to be in active labor, "...unless deemed necessary for the safety and security of the inmate, the staff, and the public").

This Final EIR, including all comments submitted to the County on the Draft EIR, will be provided to the County of Los Angeles Board of Supervisors. Therefore, your concerns will be presented directly to the decision makers prior to consideration of Project approval.



MIRA LOMA WOMEN'S DETENTION CENTER PROJECT
PUBLIC MEETING- DECEMBER 8, 2015
6:00 TO 8:00 PM

COMMENTS:

Dear Mr. Diaz - I am writing to express my vehement opposition to the construction of another women's jail in LA county. The allocation of funds would be far better utilized or if diverted to community-based programs that prevent incarceration or vice alternative programs to prison altogether. Existing high recidivism rates will not be combated by more prisons - only more services can address the mental, social-emotional, educational, & vocational needs of at-risk women. In addition, resources must be funnelled into existing women prisons to ~~provide~~ provide robust rehabilitative & educational services. Please stop putting band-aids (expensive ones) on wounds that require attention and care.

Fang-1

NAME: Betty Fang

ADDRESS: 650 S. SPRING ST. #402, LOS ANGELES CA 90014

E-MAIL: HELLOBETTYFANG@GMAIL.COM

Betty Fang

Fang-1

Regarding the commenter's concern about the building of a new jail and the associated costs, although the Project site has been unoccupied since 2012 as discussed in Section 2.0, Environmental Setting, the Project site has generally been in operation and providing various detention/jail functions since 1945-1946, when the California Youth Authority began to run a vocational school for juvenile offenders at the site. The MLWDC Project proposes the adaptive reuse, renovation, and expansion of the majority of the buildings at the MLDC, which is an existing County asset. The redevelopment of the property would avoid the costs associated with constructing a new facility.

The Project will offer general education classes, computer training, general and vocational career technical education, college courses, career counseling, a learning resource center, a library and computer labs, culinary classes, and indoor/outdoor recreation for inmates. Other services include religious services, counseling services, and community transition services. Participation in classes, training, and other activities will be scheduled for each inmate according to individual evaluation, interests, needs, and availability.

Course selections will be determined based on a student's needs for specific services, and students' interest levels. Courses will be offered during three blocks of time each weekday (morning, afternoon, and evening), providing opportunities for inmates to be enrolled in multiple courses. Programs are also divided into three categories based on program intensity: all-day, half-day, and evening programs. Examples of all-day programs (morning and afternoon) include culinary arts programs, cosmetology programs, and Prisoner Assisted Community Enhancement (PACE). Examples of half-day programs (morning or afternoon) include: small engine repair; animal grooming/training; social media management and marketing/office assistant; automotive detailing, windshield and headlight repair; and recycling. Examples of evening programs include: computer coding; small business entrepreneurship; community college; Associate of Arts Degree; and General Education. Other programs include prenatal programs, volunteer programs; peer mentoring; physical education; dance; arts and crafts; a commissary program; and book clubs.

In addition, the Board of Supervisors has adopted numerous recent actions to reduce the number of people who are incarcerated in Los Angeles County, particularly those with mental illness and/or substance use disorders. The Board of Supervisors' 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 in a document entitled "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".

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 Countywide Criminal Justice Coordination Committee. All Advisory Board members participated in the Countywide 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 of Los Angeles Chief Executive Office (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 Re-Entry (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 of Supervisors determined the Office will be a part of the Department of Health Services and the Director of the Office will report to the Director of the Department of Health Services. The Director of this Office will be 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 Sheriff, Fire Chief, Chief Executive Office, Superior Court, Public Defender, Alternate Public Defender, Probation, District Attorney, Mental Health, Public Health and Health Services.

The Office will oversee Countywide diversion efforts including a system of integrated mental, physical and public health care services and supportive housing for those at risk of homelessness who are re-directed 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 of Supervisors directed that future budget allocations be a part of the annual budget process. On September 1, 2015, the Board of Supervisors also directed that the Office distribute funding so at least 1,000 individuals would be diverted across all intercept points within the criminal justice system.

The Criminal Justice Mental Health Advisory Board report of August 2015 concluded that even with increased opportunities for diversion from a jail environment, there will still be a need for mental health treatment in jails, and that diversion efforts can reduce, but will not eliminate, the need for the County to operate detention facilities. In light of the County's diversion efforts, the Board of Supervisors directed that, for purposes of on-going study and evaluation in the environmental review process, the maximum size of the proposed women's detention center at Mira Loma in Lancaster would remain at 1,604 beds. In addition the Board of Supervisors reduced the maximum proposed size by approximately 1,000 beds, for purposes of the environmental review of a separate proposed treatment and detention center addressing needs of incarcerated men and women with mental illness and/or substance use disorders at the site of the current Men's Central Jail in downtown Los Angeles. In summary, the Board of Supervisors has taken steps to reduce the number of people who are incarcerated in Los Angeles County.

This Final Environmental Impact Report (EIR), including all comments submitted to the County on the Draft EIR, will be provided to the County of Los Angeles Board of Supervisors. Therefore, your concerns will be presented directly to the decision makers prior to consideration of Project approval.



MIRA LOMA WOMEN'S DETENTION CENTER PROJECT
PUBLIC MEETING- DECEMBER 8, 2015
6:00 TO 8:00 PM

COMMENTS: As an anthropologist at USC, I know the crucial and ~~can~~ crucial role that women play in the life of their families and communities. Isolating ~~to~~ female felons in a proposed Lancaster site will further isolate and alienate these women as mothers and daughters from their community. ~~It~~ Also most imprisoned individuals come from impoverished communities and a location in Lancaster, without access to public transport ~~it~~ will generally affect women + their families.

Gajaweena-
1

NAME: Nalika Gajaweena.
ADDRESS: 1904 west 6th st Long Beach 90802
E-MAIL:

Nalika Gajaweena

Gajaweena-1

With respect to the concern raised about mothers being separated from their children and community, the purely social effects of a project are beyond the scope of CEQA analysis, which focuses on the proposal's effect on the physical environment. This Final Environmental Impact Report (EIR), including all comments submitted to the County on the Draft EIR, will be provided to the County of Los Angeles Board of Supervisors. Therefore, your concerns will be presented directly to the decision makers prior to consideration of Project approval.

The Draft Environmental Impact Report (EIR) acknowledges that increased driving distances would be required for some families with the Project due to the location of the site in relation to the Century Regional Detention Facility (CRDF) in Lynwood, which is closer to higher density urban areas near the City of Los Angeles. The County is aware of the potential challenges the increased distance may pose for some visiting family members, while for other visiting family members from the Lancaster and other County areas, the Project location will be closer to their homes than the current women's jail in Lynwood. As demonstrated on page 3-4, in Section 3.0, Project Description, the Board of Supervisors directed the establishment of an Advisory Board (now called the Gender Responsive Advisory Committee) that will report to the Board of Supervisors on specific programmatic and operational issues. The Advisory Committee has already begun to organize its meetings with a membership including representatives of County staff, outside agencies, advocates, organizations, individuals with incarceration experience, and representatives with expertise in reducing recidivism of female inmates. As part of its charge, the Advisory Committee is tasked with reviewing the program model for the proposed MLWDC Project to ensure that it is evidence-based in reducing recidivism; evaluating strategies to reduce negative impacts of operating the proposed MLWDC away from the downtown Los Angeles area, including contract transportation for visitors, video visiting for attorney consultation; and reviewing national best practices for visiting and family reunification.

Regarding the comment on access to public transportation, Section 4.13, Transportation and Traffic, of the Draft EIR discusses potential impacts related to public transportation (Metrolink trains and Antelope Valley Transit Authority [AVTA] bus service). As discussed on page 4.13-23 and 4.13-24, the existing transit services in the area will adequately accommodate the increase of Project-generated transit trips. The Project would not significantly impact alternative transportation and impacts would be less than significant.

From: Gallardo, Ricardo [mailto:Ricardo.Gallardo@jacobs.com]
Sent: Tuesday, March 01, 2016 10:52 AM
To: CEO Environmental <environmental@ceo.lacounty.gov>
Subject: DRAFT EIR CCTF

Hello –
When will the Draft EIR be available for CCTF?

Thank you,
Ricadrdo

Ricardo Gallardo, CCM | [JACOBS](#) | m: 562-715-1940

} Gallardo-1

Richard Gallardo (March 1, 2016)

Gallardo-1

The Draft EIR for the proposed Consolidated Correctional Treatment Facility (CCTF), an independent jail proposal which would replace the downtown Men's Central Jail, has not been completed at this time.

From: Rosa Gonzalez [<mailto:rozygg93@hotmail.com>]

Sent: Thursday, November 05, 2015 9:04 AM

To: CEO Environmental

Subject: Comments on the Draft EIR

To whom it may concern:

I am sending this email in regards to the Draft Environmental Impact Report for the Mira Loma Women's Dentention Center project.

I do not agree with the expansion of the Mira Loma prison as I believe the most effective way of rehabilitating incarcerated women is to have them released and receiving assistance outside prison. The educational services that are proposed in this project should be provided to ALL inmates regardless of expansion. Countless others are working on building better community solutions as opposed to better jails. Thanks for your time.

Gonzalez-
1

Sincerely,

Rosa Gonzalez

Sent from my Verizon Wireless 4G LTE smartphone

Rosa Gonzalez (November 5, 2015)

Gonzalez-1

This Final EIR, including all comments submitted to the County on the Draft EIR, will be provided to the County of Los Angeles Board of Supervisors. Therefore, your concerns will be presented directly to the decision makers prior to consideration of Project approval.

The purpose of and need for the Project is described in detail in Section 3.1, Project Background, of the Draft EIR. That section provides information regarding the County's existing detention facilities, relevant regulatory mandates, and studies analyzing future facility needs, including for housing of female inmates.

Section 3.0, Project Description, of the Draft Environmental Impact Report (EIR) states that the Project will offer general education classes, computer training, general and vocational career technical education, college courses, career counseling, a learning resource center, a library and computer labs, culinary classes, and indoor/outdoor recreation for inmates. Other services include religious services, counseling services, and community transition services. Participation in classes, training, and other activities will be scheduled for each inmate according to individual evaluation, interests, needs, and availability.

Course selections will be determined based on their needs for specific services and students' interest levels. Courses will be offered during three blocks of time each weekday (morning, afternoon, and evening), providing opportunities for inmates to be enrolled in multiple courses. Programs are also divided into three categories based on program intensity: all-day, half-day, and evening programs. Examples of all-day programs (morning and afternoon) include culinary arts programs, cosmetology programs, and Prisoner Assisted Community Enhancement (PACE). Examples of half-day programs (morning or afternoon) include small engine repair, animal grooming/training, social media management and marketing/office assistant, automotive detailing, windshield and headlight repair, and recycling. Examples of evening programs include computer coding, small business entrepreneurship, community college, Associate of Arts Degree, and General Education. Other programs include prenatal programs, volunteer programs, peer mentoring, physical education, dance, arts and crafts, a commissary program, and book clubs.

The Board of Supervisors has adopted numerous recent actions to reduce the number of people who are incarcerated in Los Angeles County, particularly those with mental illness and/or substance use disorders. The Board of Supervisors' 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 in a document entitled "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".

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 Countywide Criminal Justice Coordination Committee. All Advisory Board members participated in the Countywide 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 of Los Angeles

Chief Executive Office (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 Re-Entry (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 of Supervisors determined the Office will be a part of the Department of Health Services and the Director of the Office will report to the Director of the Department of Health Services. The Director of this Office will be 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, the Superior Court, the Public Defender, the Alternate Public Defender, Probation, the District Attorney, Mental Health, Public Health, and Health Services.

The Office will oversee Countywide diversion efforts including a system of integrated mental, physical, and public health care services and 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 of Supervisors directed that future budget allocations be a part of the annual budget process. On September 1, 2015, the Board of Supervisors also directed that the Office distribute funding so at least 1,000 individuals would be diverted across all intercept points within the criminal justice system.

The Criminal Justice Mental Health Advisory Board report of August 2015 concluded that, even with increased opportunities for diversion from a jail environment, there will still be a need for mental health treatment in jails and that diversion efforts can reduce, but will not eliminate, the need for the County to operate detention facilities. In light of the County's diversion efforts, the Board of Supervisors directed that, for purposes of ongoing study and evaluation in the environmental review process, the maximum size of the proposed women's detention center at Mira Loma in Lancaster would remain at 1,604 beds. In addition the Board of Supervisors reduced the maximum proposed size by approximately 1,000 beds, for purposes of the environmental review of a separate proposed treatment and detention center addressing needs of incarcerated men and women with mental illness and/or substance use disorders at the site of the current Men's Central Jail in downtown Los Angeles.



MIRA LOMA WOMEN'S DETENTION CENTER PROJECT
PUBLIC MEETING- DECEMBER 8, 2015
6:00 TO 8:00 PM

COMMENTS:

AL MOVER LA CARCEL DE MUJERES HACIA EL DESIERTO USTEDES MISMOS VAN A SER UNA SOCIEDAD MAS VIOLENTA Y AGRESIVA YA QUE UCHOS DE SUS HIJOS DE ESAS MUJERES NO TENDRAN MAS OPORTUNIDAD DE VISITAS A SUS RESPECTIVOS FAMILIARES YA QUE SI SIENDO DE MUY AJOS RECURSOS SE LES DIFICULTA VISITARLES... CON ESA MEDIDA VE ESTAN HACIENDO MENOS PODRAN HACERLO. QUIEN HOY EN, YA PUEDE DARSE EL LUJO O PRIVILEGIO DE TOMAR UN DIA MINIMO DE TRABAJO? QUIEN PERDONA UNA FALTA EN A ESCUELA? QUIEN PERDONA UN DOLAR? MINIMO UN DOLAR PARA SUBIR AL TRANSPORTE O PAGAR BILES?

Gutierrez-1

NAME: Josefina Gutierrez
ADDRESS: 11849 Horton Ave
E-MAIL: Downey CA. 90241

HOY HACEN PASAR A NUESTRA GENTESITA UN INFIERNO VOTA: PERO YO NO QUIERO QUE USTEDES PASEN LA ETERNIDAD AHI!

Gutierrez-2

Josefina Gutierrez

Gutierrez-1

English translation of Spanish comment:

By moving the women's detention center to the desert, you will create a more violent and aggressive society since many of those women's children will not have the opportunity to visit their family, since if they have a very low income, it will be difficult for them to visit them... With that action, less people will be able to do that. Who has nowadays the luxury or privilege of taking a day off? Who allows for an absence from school? Who has a dollar to spare? Who has a dollar at least to pay for transport or to pay bills?

English Response:

The comment alleges creation of "a more violent and aggressive society" and relates to the merits of the proposed Project, and not the environmental analysis included in the Draft EIR or the environmental impacts of the Project. 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 proposed MLWDC will accommodate various forms of visitation, including traditional non-contact visiting, telephone access, video visiting, and contact visiting. Contact visits refer to opportunities for inmates and visitors to interact face to face, allowing for physical contact. Non-contact visits refer to visitations where the inmate and the visitor are separated by a glass barrier, and no physical contact is allowed. Video visits refer to long-distance visitation that can occur through a video conferencing program, allowing the inmate and the visitor to hear and see each other via the computer and screen. Therefore, video visiting is a component of the Project's visiting program.

The Draft EIR acknowledges that increased driving distances would be required for some families with the Project due to the location of the site in relation to the CRDF in Lynwood, which is closer to higher density urban areas near the City of Los Angeles. The County is aware of the potential challenges this increased distance may pose for some visiting family members, while for other visiting family members from the Lancaster and other County areas, the Project location will be closer to their homes than the current women's jail in Lynwood. As demonstrated on page 3-4, in Section 3.0, Project Description, the Board of Supervisors directed the establishment of an Advisory Board (now called the Gender Responsive Advisory Committee) that will report to the Board of Supervisors on specific programmatic and operational issues. The Advisory Committee has already begun to organize its meetings with a membership including representatives of County staff, outside agencies, advocates, organizations, individuals with incarceration experience, and representatives with expertise in reducing recidivism of female inmates. As part of its charge, the Advisory Committee is tasked with reviewing the program model for the proposed MLWDC Project to ensure that it is evidence-based in reducing recidivism; evaluating strategies to reduce negative impacts of operating the proposed MLWDC away from the downtown Los Angeles area, including contract transportation for visitors, video visiting for attorney consultation; and reviewing national best practices for visiting and family reunification.

Spanish translation of English response:

El comentario alega la creación de "una sociedad más violenta y agresiva" y relaciona los méritos del Proyecto propuesto y no el análisis ambiental incluido en el EIR Borrador o los impactos ambientales del Proyecto. Los efectos puramente sociales de un proyecto están más allá del

alcance del análisis de la CEQA, que se enfoca en el efecto de la propuesta sobre el ambiente físico.

El MLWDC propuesto brindará varias formas de visitas, que incluyen la tradicional visita sin contacto, acceso por teléfono, visitas por videoconferencia y visitas con contacto. Las visitas con contacto hacen referencia a oportunidades para que los internos y los visitantes interactúen cara a cara, permitiéndoles el contacto físico. Las visitas sin contacto hacen referencia a las visitas en las que el interno y el visitante están separados por una barrera de vidrio y no se permite ningún tipo de contacto físico. Las visitas por videoconferencia hacen referencia a visitas a larga distancia que pueden realizarse a través de un programa de videoconferencia, el cual permite al interno y al visitante escucharse y verse mediante la computadora y la pantalla. Por lo tanto, las visitas por videoconferencia son un componente del programa de visitas del Proyecto.

El EIR Borrador reconoce que con el Proyecto algunas familias requerirían distancias de manejo mayores debido a la ubicación del sitio con relación al CRDF en Lynwood, que se encuentra más cerca de áreas urbanas de mayor densidad próximas a la Ciudad de Los Ángeles. El Condado está al tanto de los potenciales desafíos que esta distancia mayor podría plantear para algunos familiares visitantes, mientras que para otros familiares visitantes de Lancaster y otras áreas del Condado, la ubicación del Proyecto será más cercana a sus hogares que la cárcel de mujeres actual en Lynwood. Como se demostró en la página 3-4 en la Sección 3.0, Descripción del Proyecto, la Junta de Supervisores ordenó el establecimiento de una Junta Asesora (ahora denominada Comité Asesor con Perspectiva de Género) que presentará informes a la Junta de Supervisores sobre problemas programáticos y operativos específicos. El Comité Asesor ya ha comenzado a organizar sus reuniones con miembros que incluyen representantes del personal del Condado, agencias externas, defensores, organizaciones, personas con experiencia en encarcelamiento y representantes con experiencia en la reducción de la reincidencia de las reclusas. Como parte de su cargo, el Comité Asesor tiene la tarea de revisar el modelo de programa para el Proyecto MLWDC propuesto para garantizar que se base en pruebas para reducir la reincidencia; evaluar las estrategias para reducir los impactos negativos de operar el MLWDC propuesto lejos del área del centro de Los Ángeles, incluyendo contratación de transporte para visitantes y videoconferencias para consultas con abogados; y revisar las mejores prácticas nacionales para visitas y reunificación familiar.

Gutierrez-2

English translation of Spanish comment:

You are putting our people through hell, but I don't want you to spend eternity there.

English Response:

This comment raises social issues that are beyond the scope of CEQA analysis. The comment does not address the proposed Project, the environmental analysis included in the Draft EIR or the environmental impacts of the Project. This Final EIR, including all comments submitted to the County on the Draft EIR, will be provided to the County of Los Angeles Board of Supervisors. Therefore, your concerns will be presented directly to the decision makers prior to consideration of Project approval.

Spanish translation of English response:

Este comentario presenta cuestiones sociales que van más allá del alcance del análisis de la CEQA. El comentario no trata el Proyecto propuesto, el análisis ambiental incluido en el EIR

Borrador ni los impactos ambientales del Proyecto. Este EIR Final, incluyendo todos los comentarios presentados al Condado en el EIR Borrador, será proporcionado a la Junta de Supervisores del Condado de Los Ángeles. Por lo tanto, sus preocupaciones serán presentadas directamente a las personas encargadas de tomar decisiones antes de la consideración de la aprobación del Proyecto.

From: Shirley Harriman <llaposterqueen@sbcglobal.net>
Sent: Friday, January 29, 2016 11:18 AM
To: CEO Environmental
Subject: Notice List

Kindly add me to your public notices list and
thank you.

} Harriman-
1

Shirley Harriman
40110 172nd Street East
Lake Los Angeles CA 93591
661-264-1661
LLAPOSTERQUEEN@SBCGLOBAL.NET

Shirley Harriman (January 29, 2016)

Harriman-1

As requested, the commenter has been added to the public notice list for this Project. The Final EIR will be posted with the Draft EIR on the County's website at:

<ftp://dpwftp.co.la.ca.us/pub/PMD/MiraLomaWomenFacility>.

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

From: Jess H <donotreply@wordpress.com>
Sent: Wednesday, February 03, 2016 11:28 AM
To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental; lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov; FifthDistrict@lacbos.org
Subject: Attn: Mira Loma Women's Jail, Environmental Impact Report

Name: Jess H
Email: Jess@criticalresistance.org
Address: 1904 Franklin St #504
City: Oakland
State: CA
Zip Code: 94612

Comment (please personalize): Dear LA County Chief Exec Office and Board of Supervisors,

I'm writing as a concerned California resident who recently celebrated a victory against jail expansion in San Francisco. This is a critical moment for our state, when we have a clear and compelling decision to make: invest in people, healthcare and sustainable public infrastructure, or continue to cage human beings and squander millions of dollars further impoverishing our communities and public resources. I urge you to take action and reject this environmentally toxic jail plan for LA, which proposed caging women on a toxic land site at the far reaches of LA County.

Heaney-1

We have been fighting your proposals for jail expansion in LA for ten years and this draft EIR presents another clear example of how and why jails are socially, environmentally, and economically toxic to residents in LA.

Heaney-2

Please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

The basics are clear and we've said this to you time and again (I come to LA frequently to support local resistance to jail expansion): A new LA county jail in Lancaster will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction.

Heaney-3

This is not your only option: With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

Heaney-4

This plan also spells out social distress and hardship for communities impacted by imprisonment: the proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

Heaney-5

This land is toxic! The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts

Heaney-6

prisoners at the jail, in custody of the County of Los Angeles, in extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

} Heaney-7

} Heaney-8

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

} Heaney-9

Best,
Jess Heaney
www.criticalresistance.org

Time: February 3, 2016 at 7:28 pm
IP Address: 50.184.222.50
Contact Form URL: <http://lanomorejails.org/2016/01/05/urgent-submit-comment-now-against-proposed-new-la-county-jail/>
Sent by an unverified visitor to your site.

Jess Heaney (February 3, 2016)

Heaney-1

This comment raises concerns regarding the merits of the proposed Project, and not the environmental analysis included in the Draft EIR or the environmental impacts of the Project. This Final EIR, including all comments submitted to the County on the Draft EIR, will be provided to the County of Los Angeles Board of Supervisors. Therefore, your concerns will be presented directly to the decision makers prior to consideration of Project approval.

Regarding the comment asserting that the Project will be located at a "toxic land site," please see response for Heaney-6 below.

Regarding the commenter's concerns about the expansion of jails, the Board of Supervisors has adopted numerous recent actions to reduce the number of people who are incarcerated in Los Angeles County, particularly those with mental illness and/or substance use disorders. The Board of Supervisors' 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 in a document titled: *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, Fire Chief, Directors of the Departments of Mental Health, Health Services, Public Health, Veteran's Affairs, Public Social Services, Public Defender, and the Executive Director of the Countywide 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 of Los Angeles Chief Executive Office (CEO) has acknowledged that these recommendations recognize that there are potential new efficiencies and cost avoidance by re-directing 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 Re-Entry (Office) within the Department of Health Services. That ordinance was adopted, and the Office has been established pursuant to Section 2.76.600 in the Los Angeles County Code. For administrative oversight, the Board of Supervisors determined the Office will be a part of the Department of Health Services and the Director of the Office will report to the Director of the Department of Health Services. The Director of this Office will be 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 Sheriff, Fire Chief, Chief Executive Office, Superior Court, Public Defender, Alternate Public Defender, Probation, District Attorney, Mental Health, Public Health and Health Services.

The Office will oversee 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 re-directed 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 funding of \$74.5 million to be spent 40 percent on housing, 50 percent for diversion and anti-recidivism programming and 10 percent for administration. The Board of Supervisors directed that future budget allocations be a part of the annual budget process. On September 1, 2015, the Board of Supervisors also directed that the Office distribute funding so at least 1,000 individuals would be diverted across all intercept points within the criminal justice system.

The Criminal Justice Mental Health Advisory Board report of August 2015 included the conclusions that even with increased opportunities for diversion from a jail environment, there will still be a need for mental health treatment in jails, and that diversion efforts can reduce, but will not eliminate, the need for the County to operate detention facilities. In light of the County's diversion efforts, the Board of Supervisors directed that, for purposes of on-going study and evaluation in the environmental review process, the maximum proposed size of the proposed women's detention center at Mira Loma in Lancaster would remain at 1,604 beds. In addition the Board of Supervisors reduced the maximum proposed size by approximately 1,000 beds, for purposes of the environmental review of a separate proposed treatment and detention center addressing needs of incarcerated men and women with mental illness and/or substance use disorders at the site of the current Men's Central Jail in downtown Los Angeles. In summary, the Board of Supervisors has taken steps to reduce the number of people who are incarcerated in Los Angeles County.

Heaney-2

This comment relates to the merits of the proposed Project, and not the environmental analysis included in the Draft EIR or the environmental impacts of the Project. Purely social effects of a project are beyond the scope of CEQA analysis, which focuses on the proposal's effect on the physical environment. This Final EIR, including all comments submitted to the County on the Draft EIR, will be provided to the County of Los Angeles Board of Supervisors. Therefore, your concerns will be presented directly to the decision makers prior to consideration of Project approval.

Heaney-3

This comment alleges that the Draft EIR fails to address the negative impacts on the residents and the natural landscape of the proposed Project. The Draft EIR for the proposed Project has been prepared in accordance with the California Environmental Quality Act (CEQA, *California Public Resources Code*, Sections 21000 et seq.) and the State CEQA Guidelines (14 *California Code of Regulations* [CCR]), and addresses the potential direct, indirect, and cumulative impacts of the Project on all environmental issue areas. As demonstrated throughout the Draft EIR, all potentially significant impacts have been reduced to levels that are less than significant through the identified mitigation measures, and no significant unavoidable environmental impacts would result from Project implementation.

Section 5.0, Project Alternatives, was prepared in accordance with Sections 15126.6(a) through 15126.6(f) of the State CEQA Guidelines and adequately considers alternatives to the proposed Project. As demonstrated in that section, an EIR must describe a range of reasonable and of potentially feasible alternatives to the proposed Project, or to the location of the Project, which would feasibly attain most of the basic Project Objectives but would avoid or substantially lessen

any significant effects. An EIR is not required to consider alternatives that are infeasible. The range of alternatives is governed by a "rule of reason" that requires discussion of only those alternatives necessary for the County of Los Angeles Board of Supervisors (Board) to make a reasoned choice.

As demonstrated in Section 3.0, Project Description, on October 22, 2013, the Board authorized the evaluation of a proposal to use a portion of the Mira Loma Detention Center (MLDC) property as the site for a female detention facility in lieu of the Pitchess Detention Center (PDC) site previously proposed. In May, 2014, the Board directed that "Option 1B" be studied, as recommended in the *Los Angeles County Jail Plan Independent Review and Comprehensive Report* (Jail Plan Report). Option 1B recommended continued evaluation of renovating the facility at MLDC for a women's detention center. The Draft EIR has been prepared to evaluate the environmental impacts of pursuing the proposed Project, in compliance with this Board directive.

The proposed Project does not hinder or preclude the Board's consideration of alternate approaches to incarceration, including the commenter's suggestions regarding diversion.

Out-of-custody alternatives were not required to be analyzed in the Draft EIR beyond the No Project alternative analyses, and they would not be able to achieve the Project's primary goal, as stated below and in Section 5.3.2 of the Draft EIR.

The Project's goal is to provide detention facilities for low- to medium-security level female inmates that meet modern correctional standards and that prioritize the on-site integration of gender-responsive female inmate education, treatment, and vocational training. This goal focuses on providing a secure detention facility with cost-effective therapeutic and rehabilitative programs to meet needs of eligible female inmates in order to reduce recidivism.

In addition, environmental impacts associated with "no action," are provided in Alternative 1A: No Project/Continuation of Existing Operations and Alternative 1B: No Project/Predictable Actions, as demonstrated in Section 5.0, Alternatives. These alternatives analyze the potential environmental impacts that would result if the County chose not to implement the proposed Project.

Heaney-4

Please see the response to comment Heaney-1 regarding the County's actions to reduce the inmate population. The purpose of and need for the Project is described in detail in Section 3.1, Project Background, of the Draft EIR. That section provides information regarding the County's existing detention facilities, relevant regulatory mandates, and studies analyzing future facility needs, including for housing of female inmates.

Heaney-5

The Draft EIR acknowledges that increased driving distances would be required for some families with the Project due to the location of the site in relation to the Century Regional Detention Facility (CRDF) in Lynwood, which is closer to higher density urban areas near the City of Los Angeles. The County is aware of the potential challenges the increased distance may pose for some visiting family members, while for other visiting family members from the Lancaster and other County areas, the Project location will be closer to their homes than the current women's jail in Lynwood. As demonstrated on page 3-4, in Section 3.0, Project Description, the Board of Supervisors directed the establishment of an Advisory Board (now called the Gender Responsive Advisory

Committee) that will report to the Board of Supervisors on specific programmatic and operational issues. The Advisory Committee has already begun to organize its meetings with a membership including representatives of County staff, outside agencies, advocates, organizations, individuals with incarceration experience, and representatives with expertise in reducing recidivism of female inmates. As part of its charge, the Advisory Committee is tasked with reviewing the program model for the proposed MLWDC Project to ensure that it is evidence-based in reducing recidivism; evaluating strategies to reduce negative impacts of operating the proposed MLWDC away from the downtown Los Angeles area, including contract transportation for visitors, video visiting for attorney consultation; and reviewing national best practices for visiting and family reunification.

Regarding the commenter's concern about increased traffic, Section 4.13, Transportation and Traffic, estimates the trip generation of the Project, which includes all trip types (i.e., staff and employees, service, and inmate visitation trips) and discusses potential impacts related to Project-generated traffic. The analysis indicates that an increase in traffic volumes would not significantly impact local intersections (intersections would still operate at Level of Service D or better), or alternative transportation (Metrolink trains or Antelope Valley Transit Authority [AVTA] bus service), and impacts on California Department of Transportation (Caltrans) facilities would be less than significant. As discussed on page 4.13-23 and 4.13-24, the existing transit services in the area will adequately accommodate the increase of Project-generated transit trips. No mitigation is required for short-term construction or long-term operation traffic impacts.

Regarding the commenter's concern about smog and air pollutants, Section 4.2, Air Quality, presents the results of the emission analysis using California Emissions Estimator Model (CalEEMod) Version 2013.2.2, which is a computer program that is used to calculate anticipated emissions associated with land development projects in California. As shown in Table 4.2-7 of Section 4.2, Air Quality, the estimated annual operational emissions due to Project-related operations would not exceed the Antelope Valley Air Quality Management District's (AVAQMD's) CEQA significance thresholds and potential impacts would be less than significant.

Heaney-6

The Project site is listed in government databases due to past hazardous material uses. However, it was never operated as a site that accepted hazardous wastes for disposal. The Draft EIR includes the results of site-specific studies on hazards and hazardous materials. A Phase I Environmental Site Assessment (ESA) was prepared that reviewed past and current uses and site conditions and identified Recognized Environmental Concerns (RECs) on the Project site and surrounding area. The Phase I ESA is provided in Appendix E-1 of the Draft EIR. Subsequent to the Phase I ESA, a Phase II ESA was prepared that included soil sampling to determine if soil contamination is present on the Project site. The Phase II ESA is provided in Appendix E-3 of the Draft EIR. In addition, an Asbestos and Lead Based Paint Survey Report was completed to identify the building components that contained asbestos and lead-based paint. The Asbestos and Lead Based Paint Survey Report is provided in Appendix E-2 of the Draft EIR. These reports are summarized in Section 4.7, Hazards and Hazardous Materials, of the Draft EIR.

Based on the findings of these studies, mandatory compliance with existing regulations (RRs) and mitigation measures (MMs), as set forth in the Draft EIR, would prevent public health and safety hazards to inmates, employees, visitors, and other individuals at the Project site.

As stated on page 4.7-19 of the Draft EIR, the existing fueling station is located outside the Project site boundary, but may be used by the Project. This fueling station has two USTs that previously failed leak detection tests. As shown in the California Environmental Reporting System (CERS) database and the Monitoring System Certification by AW Associates in Appendix E to this Final

EIR, the tank permits were updated in 2015 and have passed subsequent leak detection tests and are now in compliance. Soil testing also indicated there is no soil contamination near the USTs (Converse 2016b). MM HAZ-3 requires the testing and repair, as necessary, of the USTs prior to the use of the existing fueling station by the Project.

The Phase II ESA included 14 soil borings to depths of 8 feet below the ground surface (bgs). All soil samples from two and four feet bgs were analyzed for Total Petroleum Hydrocarbons (TPH), Volatile Organic Compounds (VOCs), and metals in accordance with U.S. Environmental Protection Agency (USEPA) Test Methods 8015M, 8260B, and 6010B/7471A, respectively. As stated on page 4.7-18 of the Draft EIR, the soil analyses indicate that no VOCs are present in the soil samples. All reported metals, except arsenic, were found to be at levels below the California Human Health Screening Levels (CHHSLs) for both residential and commercial/industrial land. The arsenic levels are below the background level of 12 milligrams per kilogram (mg/kg) level that the DTSC has determined to be naturally occurring background levels at school sites in California. The findings of the Phase II ESA indicated that there is no soil contamination on the site (Converse 2015). With no contamination on near-surface soils, it is unlikely that groundwater contamination would be present, considering that groundwater levels in the Antelope Valley Groundwater Basin in 2006 were estimated at 120 feet bgs at the Project site (RWMG 2013).

The Draft EIR concludes that the Project's impacts would be less than significant because there is no soil or groundwater contamination on the Project site, MM HAZ-1 and MM HAZ-2 would be implemented for the handling of remaining materials that may contain asbestos and lead-based paint; MM HAZ-3 would be implemented for the reuse of other facilities near the Project site; and the use, storage, handling, transport, and disposal of hazardous materials during operation of the MLWDC would be made in compliance with existing regulations. Therefore, female inmates, including pregnant inmates and their unborn children, would not be exposed to health hazards or lifelong health effects from their stay at the MLWDC.

Heaney-7

The Project's projected water usage and storage are addressed in Section 4.14, Utilities and Service Systems. The Project's estimated water demand is less than the 250 acre-feet per year (afy) threshold established by the California Department of Water Resources (DWR) for determining whether a Water Supply Assessment (WSA) is required under legislation commonly referred to as Senate Bill (SB) 610, as further described in Section 4.14. Nonetheless, to provide informed decision-making, a WSA was prepared for the Project and is provided in Appendix G-2 of the Draft EIR. The WSA is also summarized in Section 4.14, Utilities and Service Systems. As required under SB 610, the WSA must include an evaluation of the sufficiency of the water supplies available to the water supplier to meet existing and anticipated future demands (including the demand associated with the project) over a 20-year horizon that includes normal, single-dry, and multiple-dry years. The multiple-dry year scenario would represent drought conditions. With implementation of MM UTL-1, the Los Angeles County Waterworks District No. 40 (LACWWD 40), which will be the Project's water supplier, would have the water supply needed to serve the Project. MM UTL-1 requires that the County sign the New Water Supply Entitlement Acquisition Agreement with the LACWWD 40 and pay a deposit of \$10,000 per acre-foot of annual water demand from the Project for the acquisition of additional water supplies from Antelope Valley – East Kern Water Agency (AVEK) to serve the Project.

With implementation of MM UTL-1, Project-related estimates for water supply and demand, as provided in the WSA, show that water supply is available to serve the Project during the average year, single-dry year, and multiple-dry years. The WSA concludes the information on record indicates a sufficient and reliable water supply for LACWWD 40, now and into the future, including

a sufficient water supply for the Project. These supplies are also sufficient to provide for overall growth in the LACWWD 40 service area at the rate projected in the 2010 Integrated Regional Urban Water Management Plan (IRUWMP).

Heaney-8

The comment alleges the increased risk of local residents to coccidioidomycosis, known as Valley Fever, due to ground disturbance during construction and the health risk to inmates who would be housed at the Project. Valley Fever and its potential impact on potential future inmates and County staff is discussed in Section 4.2, Air Quality. A summary of hazards associated with the fungus is provided in the Draft EIR and includes summaries of trends related to Valley Fever in Los Angeles County, as inventoried and reported by the Los Angeles County Department of Public Health (LACDPH), which was consulted during the preparation of the Draft EIR.

The Draft EIR includes an analysis of exposure hazards due to fugitive dust that may result from construction-related earth-moving activities. PDF AIR-1, which will be included in the Contractor's Specification and monitored through the Mitigation Monitoring and Reporting Program (MMRP), requires the distribution of materials on Valley Fever, or any updated materials as applicable, to worksite supervisors and construction workers. PDF AIR-2 and RR AIR-1, which will be included in the Contractor's Specification and monitored through the MMRP, requires compliance with Best Management Practices and AVAQMD Rule 403 for the prevention of fugitive dust and nuisance air contaminants. RR AIR-1 provides a listing of the most applicable AVAQMD Rules. Rule 403, Fugitive Dust, requires measures such as watering and control of track-out from the site, as well as submittal of a Dust Control Plan prior to the start of construction. Rule 403 requires control of fugitive dust and avoidance of nuisance, and Rule 402 prohibits the emission of quantities of air contaminants that could cause injury, detriment, nuisance, or annoyance to the public, or that endanger the comfort, repose, health or safety of the public. With implementation of RR AIR-1, on-site earth-moving activities would not result in fugitive dust that could affect adjacent off-site land uses.

As stated in RR AIR-2, the Project will be constructed in compliance with the Department of Health – Infection Control Policy Guidelines Procedure No. 918.01. Policy 918 is intended to prevent the spread of diseases that may be caused by construction induced airborne pollution in susceptible individuals (patients, staff and the public) in Department of Health Services (DHS) facilities. The protocols and requirements mandate the designation of an Infection Control Coordinator who must review and approve infection-control plans for new construction or renovation projects to ensure a safe environment. These infection-control plans must include infection-control measures to contain dust, debris, and other elements and to protect the patients, employees and visitors in this environment. The Infection Control Coordinator has independent authority to stop construction-related activities immediately when the public may be adversely affected by infection control hazards generated during construction-related activities and the infection control precautions and/or engineering controls are inadequate to contain the hazard. The Draft EIR states that exposure to Valley Fever during construction activities would be the same as exposure to dust, and, thus, should follow the requirements for the mitigation of dust. Impacts would be less than significant, and no mitigation is required.

Section 4.2, Air Quality, acknowledges that the future inmate population has the potential to be exposed to dust generated from soils in the Antelope Valley, which have the potential to contain *Coccidioides* spores (i.e., the fungus that causes Valley Fever) during operation of the proposed Project. As discussed in Section 3.0, Project Description, of the Draft EIR, according to the Los Angeles County Sheriff's Department, Assembly Bill (AB) 109 female inmates are serving an average of 423 days in custody from date of sentencing to date of release, while non-AB 109

female inmates serve an average of 107 days in custody. Therefore, the length of time that inmates would be living at the MLWDC is temporary, and is not equivalent to a permanent living circumstance or the longer sentences in state prisons that house higher-security inmates.

The Draft EIR summarizes the LACDPH *2013 Annual Morbidity Report*, which presents the recent trends related to Valley Fever in Los Angeles County, including and increasing incidence rate for reported coccidioidomycosis cases in the last ten years, which has doubled in the past five years. However, the overall incidence rate in the Antelope Valley has not warranted changes in the County's protocol for disease prevention, notwithstanding the fact that the County health and public health officials are well educated on the condition; are familiar with its incidence in the County and elsewhere in the state; and are involved in research and education on the subject of Valley Fever.

The LACDPH has not identified the previous U.S. Immigration and Customs Enforcement (ICE) detainee population at MLDC, the future inmate population at MLWDC, or earlier occupants at the High Desert Health System (HDHS) Multi-Ambulatory Care Center (MACC) (the adjacent hospital facility, which has relocated in Lancaster) as requiring the implementation of health screening protocols or other measures to address potential Valley Fever exposure.

Also, as demonstrated in Section 4.2, Air Quality, the California Department of Corrections and Rehabilitation (CDCR) has not identified the Lancaster area as being a geographic location that requires screening or interventions for the State prison population with regard to exposure to Valley Fever (CDCR 2013). As discussed with the Sheriff's Department staff for the preparation of the Draft EIR, the operation of the MLWDC will follow standard Sheriff's Department procedures for medical care and prevention with regard to health care for inmates in general, and Valley Fever specifically, and the Sheriff's Department will continue to coordinate with LACDPH (Masis 2015). The LACDPH is the designated County agency with the mandate to protect health, prevent disease, and promote the health and well-being of all persons within Los Angeles County. As such, any future changes in LACDPH policies that may be made regarding Valley Fever for inmate populations will be implemented, as applicable, throughout the County jail system.

Because the future inmate population's exposure to disturbed soils would be limited to gardening activities, PDF AIR-3 in Section 4.2, Air Quality, states that the Project will import gardening soils from outside of the Antelope Valley, which would be used in raised planting beds to remove gardening in native soil as a potential source of exposure to Valley Fever spores. Further, outdoor recreational areas would be covered with landscaping, turf grass, gravel or landscaping/wood chip ground cover that would minimize the opportunity for soils to become airborne.

The Antelope Valley has not been identified by the LACDPH, the AVAQMD, or any other governmental health agency as a region that should be avoided by the elderly, women, children, health-compromised individuals, or by any specific ethnic groups. The Antelope Valley includes the major population centers of the cities of Lancaster and Palmdale, which have an estimated 2014 combined population of approximately 314,902 people. This portion of the Antelope Valley includes a diverse population of residents that includes many individuals that could be considered to be at higher risk of complications due to infection from Valley Fever spores. As stated in Section 4.2, Air Quality, persons at the highest risk of developing disseminated Valley Fever include the very young (under 1 year old); adults over 60 years; immunocompromised individuals; people with diabetes; women in the third trimester of pregnancy; and certain ethnic groups, including African-Americans and Filipinos.

The demographics of the two cities include approximately 158,605 females (50.4 percent) and 156,297 males (49.6 percent) with a median age of approximately 30.7 years old. The

racial/ethnic composition of the area is approximately 47 percent Latino, 29 percent white, 17 percent African American, and 4 percent Asian (U.S. Census Bureau 2016). As such, the temporary presence of a female inmate population into the Antelope Valley would not introduce a new or unusual demographic into the area that is not already present in the existing population of the region.

The MLWDC property is not located in an area determined to be hazardous to the health of local residents or visitors to the region. The Draft EIR concludes that the potential future inmate population's temporary placement into the Antelope Valley, which includes the inmates' participation in all indoor and outdoor activities at the MLWDC, would not constitute placement into a hazardous existing environmental setting that would require mitigation. Additionally, the operation of the proposed Project would not increase the prevalence of Valley Fever spores or otherwise exacerbate an existing environmental condition.

Heaney-9

The EIR for the MLWDC has been prepared and processed in accordance with CEQA and the State CEQA Guidelines. As demonstrated throughout the Draft EIR, all potentially significant impacts have been reduced to levels that are less than significant through the identified mitigation measures, and no significant unavoidable environmental impacts would result from Project implementation. This Final EIR, including all comments submitted to the County on the Draft EIR, will be provided to the County of Los Angeles Board of Supervisors. Therefore, your concerns will be presented directly to the decision makers prior to consideration of Project approval.



MIRA LOMA WOMEN'S DETENTION CENTER PROJECT
PUBLIC MEETING- DECEMBER 8, 2015
6:00 TO 8:00 PM

COMMENTS: Mr Diaz -

I don't think there is any research or logic to support another jail system as being a source of good - health, benefit, further happiness - in LA County. My vote, my taxes and my presence are opposed to this sell-out and racist solution (if it meant that term) to complex social issues

Hedges-1

NAME: Broghan Hedges
ADDRESS: ~~120~~ Culver City
E-MAIL: broghan.h@ymail.com

Broghan Hedges

Hedges-1

This commenter opposes what is referred to as a "racist solution to complex social problems". This relates to the merits of the proposed Project, and not the environmental analysis included in the Draft EIR or the environmental impacts of the Project. Purely social effects of a project are beyond the scope of CEQA analysis, which focuses on the proposal's effect on the physical environment.

This Final EIR, including all comments submitted to the County on the Draft EIR, will be provided to the County of Los Angeles Board of Supervisors. Therefore, your concerns will be presented directly to the decision makers prior to consideration of Project approval.



MIRA LOMA WOMEN'S DETENTION CENTER PROJECT
PUBLIC MEETING- DECEMBER 8, 2015
6:00 TO 8:00 PM

COMMENTS:

The new jail in Lancaster needs to first ~~address~~ address the issue of contaminated soil and water due to the leaking of the underground storage tanks. The leak endangers both the prisoners and the people living around the construction site.

Jackson-1

NAME: Mackenzie Jackson

ADDRESS: 330 De Neve Drive, Los Angeles, CA, 90024

E-MAIL: kenziejackson@yahoo.com

Mackenzie Jackson

Jackson-1

Regarding the commenter's concern about contaminated soil and water from Leaking Underground Storage Tanks, the Project site is listed in government databases due to past hazardous material uses. However, the Project site was never operated as a site that accepted hazardous wastes. The Project site is on the list of Leaking Underground Storage Tanks (LUST) Sites, but the leaking underground storage tanks have been removed and the affected area cleaned up. The County Department of Public Works oversaw the remediation and issued the "no further action" letter. The California Department of Toxic Substances Control (DTSC) lists the Polaris Flight Academy with a status of "inactive-needs evaluation". As part of the Phase II Environmental Site Assessment (ESA), soil borings collected in the area of the possible former location of the airstrip did not detect any contaminants that would require further action (Converse 2015). Thus, the listing of the site in government databases was based on past uses that no longer pose hazards.

The underground storage tanks (USTs) that previously failed leak detection tests are located at the fueling station that is located outside the Project site. The tank permits were updated in 2015 and have passed subsequent leak detection tests and are now considered in compliance. Soil testing also indicated there is no soil contamination near the USTs. As stated on page 4.7-19 of the Draft EIR, the existing fueling station is located outside the Project site boundary, but may be used by the Project. This fueling station has two USTs that previously failed leak detection tests. As shown in the California Environmental Reporting System (CERS) database and the Monitoring System Certification by AW Associates in Appendix E to this Final EIR, the tank permits were updated in 2015 and have passed subsequent leak detection tests and are now in compliance. Soil testing also indicated there is no soil contamination near the USTs (Converse 2016b). MM HAZ-3 requires the testing and repair, as necessary, of the USTs prior to the use of the existing fueling station by the Project.

As part of the environmental analysis for the Draft Environmental Impact Report (EIR), a Phase I ESA has been prepared that reviewed past and current uses and site conditions and identified Recognized Environmental Concerns (RECs) on the Project site and surrounding area. The Phase I ESA is provided in Appendix E-1 of the Draft EIR. Subsequent to the Phase I ESA, a Phase II ESA was prepared that included soil sampling to determine if soil contamination is present on the site. The Phase II ESA is provided in Appendix E-3 of the Draft EIR. In addition, an Asbestos and Lead Based Paint Survey Report was completed to identify the building components that contained asbestos and lead-based paint. The Asbestos and Lead Based Paint Survey Report is provided in Appendix E-2 of the Draft EIR. These reports are summarized in Section 4.7, Hazards and Hazardous Materials of the Draft EIR.

The Project must comply with existing regulatory requirements (RRs) for the proper handling of hazardous wastes, including transportation, treatment, storage, and disposal; repair and/or removal of underground storage tanks based on applicable standards; and practices that would protect the demolition and construction crews from asbestos and lead exposure. In addition, the Project must incorporate mitigation measures (MMs) for the handling of suspected asbestos-containing materials and lead-based paint; an Operations and Maintenance Plan for regular inspection of any asbestos-containing materials; and testing and repair of underground storage tanks prior to use. Thus, existing hazardous materials and wastes would be removed from the Project site and future hazardous materials use would comply with applicable regulations to prevent hazards to future inmates. In summary, compliance with RR and implementation of MMs

set forth in the Draft EIR would prevent public health and safety hazards to inmates, employees, visitors and other individuals at the Project site.



MIRA LOMA WOMEN'S DETENTION CENTER PROJECT
PUBLIC MEETING- DECEMBER 8, 2015
6:00 TO 8:00 PM

COMMENTS:

Jails often destroy our Communities encouraging
hyper ~~participation~~ in carceration. Often many individuals are
unjustly arrested for nonviolent crimes, once they are in the prison
population they are often forced to become violent because of the
prison environment.

Jn-Marie-1

NAME: Pastor Cue Jnmarie The church without walls / Black
ADDRESS: Jewish Justice alliance.
E-MAIL: cue@therousha.com

Pastor Cue Jn-Marie

Jn-Marie-1

Inmates in the Los Angeles County jail system are incarcerated in accordance with established laws, and the process of determining which women are appropriately incarcerated is beyond the scope of this proposed Project. The County jail population is directly influenced by sentences imposed by the judicial court system. Magistrates have the legal discretion to impose the maximum or minimum sentencing.

This comment relates to the merits of the proposed Project, and not the environmental analysis included in the Draft Environmental Impact Report (EIR) or the environmental impacts of the Project. This Final EIR, including all comments submitted to the County on the Draft EIR, will be provided to the County of Los Angeles Board of Supervisors. Therefore, your concerns will be presented directly to the decision makers prior to consideration of Project approval.



MIRA LOMA WOMEN'S DETENTION CENTER PROJECT
PUBLIC MEETING- DECEMBER 8, 2015
6:00 TO 8:00 PM

COMMENTS:

I am a community organizer that works with Community Coalition, a social justice organization that has been at work for 25 years. Our criminal justice frame is prevention & intervention services & programs over incarceration. Jails have been used as surrogate mental health and treatment centers for far too long. Communities that have been impacted the most by criminalization, war on drugs tactics, and lack of investment need a supportive infrastructure that helps to successfully re-integrate back into society and not recidivate. Invest our tax dollars into our communities, not jail/prison expansion.

G.
Johnson-1

G.
Johnson-2

NAME: Gilbert Johnson

ADDRESS: 8101 S. Vermont Ave. LA, CA 90044

E-MAIL: Gilbert@ccc.southla.org

Gilbert Johnson

G. Johnson-1

Regarding the commenter's concern about the successful re-integration of inmates back into society and reducing recidivism, the Project's primary goal, is stated below and in Section 5.3.2 of the Draft EIR.

The Project's goal is to provide detention facilities for low- to medium-security level female inmates that meet modern correctional standards and that prioritize the on-site integration of gender-responsive female inmate education, treatment, and vocational training. This goal focuses on providing a secure detention facility with cost-effective therapeutic and rehabilitative programs to meet needs of eligible female inmates in order to reduce recidivism.

The Project will offer general education classes, computer training, general and vocational career technical education, college courses, career counseling, a learning resource center, a library and computer labs, culinary classes, and indoor/outdoor recreation for inmates. Other services include religious services, counseling services, and community transition services. Participation in classes, training, and other activities will be scheduled for each inmate according to individual evaluation, interests, needs, and availability.

Course selections will be determined based on a student's needs for specific services, and students' interest levels. Courses will be offered during three blocks of time each weekday (morning, afternoon, and evening), providing opportunities for inmates to be enrolled in multiple courses. Programs are also divided into three categories based on program intensity: all-day, half-day, and evening programs. Examples of all-day programs (morning and afternoon) include culinary arts programs, cosmetology programs, and Prisoner Assisted Community Enhancement (PACE). Examples of half-day programs (morning or afternoon) include: small engine repair; animal grooming/training; social media management and marketing/office assistant; automotive detailing, windshield and headlight repair; and recycling. Examples of evening programs include: computer coding; small business entrepreneurship; community college; Associate of Arts Degree; and General Education. Other programs include prenatal programs, volunteer programs; peer mentoring; physical education; dance; arts and crafts; a commissary program; and book clubs.

In addition, the Board of Supervisors has adopted numerous recent actions to reduce the number of people who are incarcerated in Los Angeles County, particularly those with mental illness and/or substance use disorders. The Board of Supervisors' 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 in a document entitled "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".

The Criminal Justice Mental Health Advisory Board report of August 2015 concluded that even with increased opportunities for diversion from a jail environment, there will still be a need for mental health treatment in jails, and that diversion efforts can reduce, but will not eliminate, the need for the County to operate detention facilities. In light of the County's diversion efforts, the Board of Supervisors directed that, for purposes of on-going study and evaluation in the environmental review process, the maximum size of the proposed women's detention center at Mira Loma in Lancaster would remain at 1,604 beds. In addition the Board of Supervisors reduced the maximum proposed size by approximately 1,000 beds, for purposes of the environmental

review of a separate proposed treatment and detention center addressing needs of incarcerated men and women with mental illness and/or substance use disorders at the site of the current Men's Central Jail in downtown Los Angeles. In summary, the Board of Supervisors has taken steps to reduce the number of people who are incarcerated in Los Angeles County.

In addition, please see the more detailed response on this issue in the response to Form Letter-1 regarding County actions relating to diversion and other out-of-custody alternatives, which is included in Section 2.3.1 of this Final EIR.

G. Johnson-2

This comment relates to the merits of the Project and does not address the proposed Project, the environmental analysis included in the Draft Environmental Impact Report (EIR) or the environmental impacts of the Project. This Final EIR, including all comments submitted to the County on the Draft EIR, will be provided to the County of Los Angeles Board of Supervisors. Therefore, your concerns will be presented directly to the decision makers prior to consideration of Project approval.



MIRA LOMA WOMEN'S DETENTION CENTER PROJECT
PUBLIC MEETING- DECEMBER 8, 2015
6:00 TO 8:00 PM

COMMENTS:

I oppose this project because there's no
need for another jail because we already got bigger
ones and it will be waste of time and space
the could use the money for better things

Jordon-1

NAME: ~~XXXX~~ Hal Jordon

ADDRESS: _____

E-MAIL: _____

Hal Jordan

Jordon-1

Regarding the commenter's concern about the building of a new jail and the associated costs, although the Project site has been unoccupied since 2012, as discussed in Section 2.0, Environmental Setting, the Project site has generally been in operation and providing various detention/jail functions from 1945–1946 until 2012. The MLWDC Project proposes the adaptive reuse, renovation, and expansion of the majority of the buildings at MLDC, which is an existing County asset. The redevelopment of the property would avoid the costs associated with constructing a new facility.

This comment relates to the merits of the proposed Project and not the environmental analysis included in the Draft Environmental Impact Report (EIR) or the environmental impacts of the Project. This Final EIR, including all comments submitted to the County on the Draft EIR, will be provided to the County of Los Angeles Board of Supervisors. Therefore, your concerns will be presented directly to the decision makers prior to consideration of Project approval.



MIRA LOMA WOMEN'S DETENTION CENTER PROJECT
PUBLIC MEETING- DECEMBER 8, 2015
6:00 TO 8:00 PM

COMMENTS:

I oppose the building of a new women's jail and ask that the County spend my tax dollars on rehabilitation, education, and community buildy. Our county is rick with solutions & experts to help guide this

Kaplan-1

I'm dismayed to learn that the Environmental Impact Report neglects to account for the increased travel-pollution & traffic — the hazardous materials site, and Valley Fever.

Kaplan-2

And certainly in the state of California we can translate the report into Spanish so that more people can access it.

Kaplan-3

NAME: ^{Sincerely,} VICTORIA KAPLAN

ADDRESS: 1545 Vanderbilt Pl, Apt A, Glendale CA 91205

E-MAIL: vkaplan@gmail.com

Victoria Kaplan

Kaplan-1

The comment expresses opposition to the jail and a preference for expenditure of tax dollars on rehabilitation and education. Purely social effects of a project are beyond the scope of CEQA analysis, which focuses on the proposal's effect on the physical environment. This Final Environmental Impact Report (EIR), including all comments submitted to the County on the Draft EIR, will be provided to the County of Los Angeles Board of Supervisors. Therefore, your concerns will be presented directly to the decision makers prior to consideration of Project approval.

The Board of Supervisors has adopted numerous recent actions to reduce the number of people who are incarcerated in Los Angeles County, particularly those with mental illness and/or substance use disorders. The Board of Supervisors' 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 in a document entitled "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".

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 Countywide Criminal Justice Coordination Committee. All Advisory Board members participated in the Countywide 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 of Los Angeles Chief Executive Office (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 Re-Entry (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 of Supervisors determined that the Office will be a part of the Department of Health Services and the Director of the Office will report to the Director of the Department of Health Services. The Director of this Office will be 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, the Superior Court, the Public Defender, the Alternate Public Defender, Probation, the District Attorney, Mental Health, Public Health, and Health Services.

The Office will oversee Countywide diversion efforts including a system of integrated mental, physical and public health care services and supportive housing for those at risk of homelessness who are re-directed 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 of Supervisors directed that future budget allocations be a part of the annual budget process. On September 1, 2015, the Board of Supervisors also directed that the Office distribute funding so at least 1,000 individuals would be diverted across all intercept points within the criminal justice system.

The Criminal Justice Mental Health Advisory Board report of August 2015 concluded that even with increased opportunities for diversion from a jail environment, there will still be a need for mental health treatment in jails, and that diversion efforts can reduce, but will not eliminate, the need for the County to operate detention facilities. In light of the County's diversion efforts, the Board of Supervisors directed that, for purposes of on-going study and evaluation in the environmental review process, the maximum size of the proposed women's detention center at Mira Loma in Lancaster would remain at 1,604 beds. In addition the Board of Supervisors reduced the maximum proposed size by approximately 1,000 beds, for purposes of the environmental review of a separate proposed treatment and detention center addressing needs of incarcerated men and women with mental illness and/or substance use disorders at the site of the current Men's Central Jail in downtown Los Angeles. In summary, the Board of Supervisors has taken steps to reduce the number of people who are incarcerated in Los Angeles County.

Kaplan-2

This comment alleges generally that the Draft Environmental Impact Report (EIR) does not account for increased travel, pollutants and traffic, hazardous materials, or Valley Fever. The Draft EIR for the proposed Project has been prepared in accordance with the California Environmental Quality Act (CEQA, *California Public Resources Code*, Sections 21000 et seq.) and the State CEQA Guidelines (14 *California Code of Regulations* [CCR]), and in fact addresses the potential direct, indirect, and cumulative impacts of the Project on all environmental issue areas. Section 5.0, Project Alternatives, was prepared in accordance with Sections 15126.6(a) through 15126.6(f) of the State CEQA Guidelines. As demonstrated throughout the Draft EIR, all potentially significant impacts have been reduced to levels that are less than significant through the identified mitigation measures, and no significant unavoidable environmental impacts would result from Project implementation.

Regarding the commenter's concern about increased traffic, Section 4.13, Transportation and Traffic, estimates the trip generation of the Project, which includes all trip types (i.e., staff and employees, service, and inmate visitation trips) and discusses potential impacts related to Project-generated traffic. The analysis indicates that increase in traffic volumes would not significantly impact local intersections (intersections would still operate at Level-of-Service D or better), or alternative transportation (Metrolink trains or Antelope Valley Transit Authority [AVTA] bus service), and impacts on California Department of Transportation (Caltrans) facilities would be less than significant. As discussed on page 4.13-23 and 4.13-24, the existing transit services in the area will adequately accommodate the increase of Project-generated transit trips. No mitigation is required for short-term construction or long-term operation traffic impacts.

Regarding the commenter's concern about pollutants, Section 4.2, Air Quality, presents the results of the emission analysis using California Emissions Estimator Model (CalEEMod) Version 2013.2.2, which is a computer program that is used to calculate anticipated emissions associated

with land development projects in California. As shown in Table 4.2-7 of Section 4.2, Air Quality, the estimated annual operational emissions due to Project-related operations would not exceed the Antelope Valley Air Quality Management District's (AVAQMD's) CEQA significance thresholds and potential impacts would be less than significant.

Regarding the commenter's concern about hazardous materials, the Project site is listed in government databases due to past hazardous material uses. However, the Project site was never operated as a site that accepted hazardous wastes. The Project site is on the list of Leaking Underground Storage Tanks (LUST) Sites, but the leaking underground storage tanks have been removed and the affected area cleaned up. The County Department of Public Works oversaw the remediation and issued the "no further action" letter. The California Department of Toxic Substances Control (DTSC) lists the Polaris Flight Academy with a status of "inactive-needs evaluation". As part of the Phase II Environmental Site Assessment (ESA), soil borings collected in the area of the possible former location of the airstrip did not detect any contaminants that would require further action (Converse 2015). Thus, the listing of the site in government databases was based on past uses that no longer pose hazards.

As part of the environmental analysis for the Draft EIR, a Phase I ESA has been prepared that reviewed past and current uses and site conditions and identified Recognized Environmental Concerns (RECs) on the Project site and surrounding area. The Phase I ESA is provided in Appendix E-1 of the Draft EIR. Subsequent to the Phase I ESA, a Phase II ESA was prepared that included soil sampling to determine if soil contamination is present on the site. The Phase II ESA is provided in Appendix E-3 of the Draft EIR. In addition, an Asbestos and Lead Based Paint Survey Report was completed to identify the building components that contained asbestos and lead-based paint. The Asbestos and Lead Based Paint Survey Report is provided in Appendix E-2 of the Draft EIR. These reports are summarized in Section 4.7, Hazards and Hazardous Materials of the Draft EIR.

The Project must comply with existing regulatory requirements (RRs) for the proper handling of hazardous wastes, including transportation, treatment, storage, and disposal; repair and/or removal of underground storage tanks based on applicable standards; and practices that would protect the demolition and construction crews from asbestos and lead exposure. In addition, the Project must incorporate mitigation measures (MMs) for the handling of suspected asbestos-containing materials and lead-based paint; an Operations and Maintenance Plan for regular inspection of any asbestos-containing materials; and testing and repair of underground storage tanks prior to use. Thus, existing hazardous materials and wastes would be removed from the Project site and future hazardous materials use would comply with applicable regulations to prevent hazards to future inmates. In summary, compliance with RRs and implementation of MMs set forth in the Draft EIR would prevent public health and safety hazards to inmates, employees, visitors and other individuals at the Project site.

Regarding Valley Fever (i.e., coccidioidomycosis), its potential impact on potential future inmates and County staff is discussed in Section 4.2, Air Quality. A summary of hazards associated with the *Coccidioides* spores (i.e., the fungus that causes Valley Fever) is provided and includes trends related to Valley Fever in Los Angeles County, as inventoried and reported by the Los Angeles County Department of Public Health (LACDPH), which was consulted during the preparation of the Draft EIR.

The Draft EIR summarizes the LACDPH 2013 *Annual Morbidity Report*, which presents the recent trends related to Valley Fever in Los Angeles County, including the increasing incidence rate within the last ten years. Data included in this report show the incidence in Valley Fever in Service Planning Area (SPA) 1 (i.e. Antelope Valley) from 2009 to 2013. The number of incidents of Valley

Fever infection spiked in 2011 in SPA 1 with 93 reported cases, which represented 30 percent of cases in Los Angeles County, with an incidence rate of 25 per 100,000 people. The incidence rate decreased to 74 reported cases in both 2012 and 2013. As such, in 2013, SPA 1 represented approximately 20.4 percent of the total reported cases in Los Angeles County, with an incidence rate of 19 per 100,000 people. SPA 1 has the highest infection rate in Los Angeles County (LACDPH 2013).

However, the rate of Valley Fever infection in Los Angeles County, and the Antelope Valley specifically, is substantially less than in neighboring Kern County, which had a 2013 infection rate of 276 per 100,000 people in the north valley region (KCPHSD 2016). The eastern portion of San Luis Obispo County had Valley Fever infection rates ranging from 205 to 257 per 100,000 people between 2007 and 2012 (SLOCPHD 2014). Therefore, although the Antelope Valley has the highest rates in Los Angeles County, the rates are well below rates found nearby counties where Valley Fever is endemic.

The overall incidence rate of Valley Fever in the Antelope Valley was not determined to warrant changes in the County's protocol for disease prevention, notwithstanding the fact that the County health and public health officials are well educated on the condition; are familiar with its incidence in the County and elsewhere in the state; and are involved in research and education on the subject of Valley Fever.

Also, as demonstrated in Section 4.2, Air Quality the California Department of Corrections and Rehabilitation (CDCR) has not identified the Lancaster area as being a geographic location that requires screening or interventions for the State prison population with regard to exposure to Valley Fever (CDCR 2013). Additionally, the LACDPH has not identified the previous U.S. Immigration and Customs Enforcement (ICE) detainee population at the MLDC, the future inmate population at the MLWDC, or earlier occupants at the High Desert Health System (HDHS) Multi-Ambulatory Care Center (MACC) (the adjacent hospital facility, which has relocated in Lancaster) as requiring the implementation of health screening protocols or other measures to address potential Valley Fever exposure.

The operation of the MLWDC will follow standard Sheriff's Department procedures for medical care and prevention with regard to health care for inmates in general, and Valley Fever specifically, and the Sheriff's Department will continue to coordinate with the LACDPH (Masis 2015). The LACDPH is the designated County agency with the mandate to protect health, prevent disease, and promote the health and well-being of all persons in Los Angeles County. As such, any future changes in LACDPH policies that may be made regarding Valley Fever for inmate populations will be implemented, as applicable, throughout the County jail system.

The MLWDC property is not located in an area determined to be hazardous to the health of local residents or visitors to the region. The Draft EIR concludes that the potential future inmate population's temporary placement into the Antelope Valley, which includes the inmates' participation in all indoor and outdoor activities at the MLWDC, would not constitute placement into a hazardous existing environmental setting that would require mitigation. Additionally, the operation of the proposed Project would not increase the prevalence of Valley Fever spores or otherwise exacerbate an existing environmental condition.

Kaplan-3

The County voluntarily added additional outreach in Spanish for the MLWDC Draft EIR public review process as a result of public comments. In January 2016, a *Notice of Extended Comment Period for the Draft Environmental Impact Report for the Mira Loma Women's Detention Center*

Project and Notice of Second Public Meeting in Lancaster, California was sent to the Project's mailing list and email list, as well as additional mailing list contacts that had provided comment letters during the Draft EIR public review period up to the time of the second mailing. This Notice was prepared in both English and Spanish. Additionally, the Executive Summary of the Draft EIR was translated into Spanish and posted on the County's website for viewing and downloading. Hardcopies of the Spanish-translated Executive Summary were made available at the Quartz Hill and Lancaster Libraries, and the Los Angeles County Public Information Office. Newspaper advertisements of the extended comment period and second public meeting were placed in the following papers and ran on Monday, February 1, 2016:

- *Acton-Aqua Dolce News*: a weekly publication so the ad was available for 7 days
- *Los Angeles Daily News*: daily publication
- *La Opinion*: a daily publication (the ad was in both English and Spanish)
- *Antelope Valley Press*: a daily publication
- *Antelope Valley Times*: an online publication

A second public meeting was held on Tuesday, February 9, 2016 at the Lancaster Public Library at 601 West Lancaster Boulevard in Lancaster, CA 93534 to present an overview of the proposed Project and the Draft EIR process and conclusions, and to invite submission of public comments on the Draft EIR. Real-time Spanish translation services were made available, as were copies of the Notice and the Executive Summary in both English and Spanish. Two members of the public attended that meeting and neither requested Spanish translation services.



MIRA LOMA WOMEN'S DETENTION CENTER PROJECT
PUBLIC MEETING- DECEMBER 8, 2015
6:00 TO 8:00 PM

COMMENTS:

DSA CITIZEN OF LOS ANGELES COUNTY, IT TROUBLES ME
HOW QUICK THE CITY IS TO FUNNEL MONEY INTO
JAIL EXPANSION THAT DIRECTLY FUNDS ENVIRONMENTAL
AND HEALTH DEGRADATION OF ITS CITIZENS. DO NOT
THINK YOU ARE DOING THIS IN THE PEOPLE'S' NAMES.
I STRONGLY URGE YOU TO DO WHAT IS BEST FOR
THE ENVIRONMENT AND OUR COMMUNITIES. DO NOT
SPENDING ON THE MIRA LOMA WOMEN'S DETENTION
CENTER.

Kate-1

NAME: Tatyana Kate

ADDRESS: 2843 WEST BLVD

E-MAIL: ttayak@ gmail com

Tutaya Kate

Kate-1

This comment generally alleges that the proposed Project will result in environmental and health deterioration and should not be funded. The Draft Environmental Impact Report (EIR) for the proposed Project has been prepared in accordance with the California Environmental Quality Act (CEQA, *California Public Resources Code*, Sections 21000 et seq.) and the State CEQA Guidelines (14 *California Code of Regulations* [CCR]), and addresses the potential direct, indirect, and cumulative impacts of the Project on all environmental issue areas. Section 5.0, Project Alternatives, was prepared in accordance with Sections 15126.6(a) through 15126.6(f) of the State CEQA Guidelines. As demonstrated throughout the Draft EIR, all potentially significant impacts have been reduced to levels that are less than significant through the identified mitigation measures, and no significant unavoidable environmental impacts would result from Project implementation.

This comment expresses opposition to Project approval. The Final EIR, including all comments submitted to the County on the Draft EIR, will be provided to the County of Los Angeles Board of Supervisors. Therefore, your concerns will be presented directly to the decision makers prior to consideration of Project approval.



MIRA LOMA WOMEN'S DETENTION CENTER PROJECT
PUBLIC MEETING- DECEMBER 8, 2015
6:00 TO 8:00 PM

COMMENTS:

The site for the proposed jail is a known 'hazardous materials site.'
How does the planning process propose to address the clear safety & health
concerns for those inside the jail?

Lan-1

Additionally, the EIR fails to adequately address and evaluate
alternatives to building the proposed jail. What attempts to
adequately address these alternatives are being made?

Lan-2

NAME: Lawrence Lan

ADDRESS: 2647 S Longwood Ave, Los Angeles, CA 90016

E-MAIL: lan.lawrence.c@gmail.com

Lawrence Lan

Lan-1

Regarding the comment on the hazardous materials site at the site, the Project site is listed in government databases due to past hazardous material uses. However, the Project site was never operated as a site that accepted hazardous wastes for disposal. The Project site is on the list of Leaking Underground Storage Tanks (LUST) Sites, but the leaking underground storage tanks have been removed and the affected area cleaned up. The County Department of Public Works oversaw the remediation and issued the “no further action” letter. The California Department of Toxic Substances Control (DTSC) lists the Polaris Flight Academy with a status of “inactive-needs evaluation”. As part of the environmental site assessments for the Project, soil borings collected in the area of the possible former location of the airstrip did not detect any contaminants that would require further action (Converse 2015). Thus, the listing of the site in government databases was based on past uses that no longer pose hazards.

As part of the environmental analysis for the Draft EIR, a Phase I Environmental Site Assessment (ESA) has been prepared that reviewed past and current uses and site conditions and identified Recognized Environmental Concerns (RECs) on the Project site and surrounding area. The Phase I ESA is provided in Appendix E-1 of the Draft EIR. Subsequent to the Phase I ESA, a Phase II ESA was prepared that included soil sampling to determine if soil contamination is present on the site. The Phase II ESA is provided in Appendix E-3 of the Draft EIR. In addition, an Asbestos and Lead Based Paint Survey Report was completed to identify the building components that contained asbestos and lead-based paint. The Asbestos and Lead Based Paint Survey Report is provided in Appendix E-2 of the Draft EIR. These reports are summarized in Section 4.7, Hazards and Hazardous Materials of the Draft EIR.

The Project must comply with existing regulatory requirements (RRs) for the proper handling of hazardous wastes, including transportation, treatment, storage, and disposal; repair and/or removal of underground storage tanks based on applicable standards; and practices that would protect the demolition and construction crews from asbestos and lead exposure. In addition, the Project must incorporate mitigation measures (MMs) for the handling of suspected asbestos-containing materials and lead-based paint; an Operations and Maintenance Plan for regular inspection of any asbestos-containing materials; and testing and repair of underground storage tanks prior to use. Thus, existing hazardous materials and wastes would be removed from the Project site and future hazardous materials use would comply with applicable regulations to prevent hazards to future inmates. In summary, compliance with RRs and implementation of MMs set forth in the Draft EIR would prevent public health and safety hazards to inmates, employees, visitors and other individuals at the Project site.

Lan-2

This comment alleges a failure to consider a comprehensive list of alternatives to the Project, including alternatives to building a jail. The Draft EIR, in fact, addresses alternatives in accordance with the California Environmental Quality Act (CEQA, *California Public Resources Code*, Sections 21000 et seq.) and the State CEQA Guidelines (14 *California Code of Regulations* [CCR]). As demonstrated in Section 5.0, Project Alternatives, an EIR must describe a range of reasonable and of potentially feasible alternatives to the proposed Project, or to the location of the Project, which would feasibly attain most of the basic Project Objectives but would avoid or substantially lessen any significant effects. Based on the analyses in Sections 4.1 through 4.15 of the Draft EIR, the proposed Project would result in significant environmental effects prior to mitigation on a number of environmental topics. Following mitigation, however, impacts to all of these topical

areas would be avoided or reduced to less than significant levels with the implementation of mitigation measures. No significant and unavoidable impacts would occur with the Project.

Additionally, an EIR is not required to consider alternatives that are infeasible. The range of alternatives is governed by a "rule of reason" that requires discussion of only those alternatives necessary for the County of Los Angeles Board of Supervisors (Board) to make a reasoned choice. As demonstrated in Section 3.0, Project Description, on October 22, 2013, the Board authorized the evaluation of a proposal to use a portion of the MLDC property as the site for a female detention facility in lieu of the Pitchess Detention Center (PDC) site previously proposed. In May, 2014, the Board directed that "Option 1B" be studied, as recommended in the *Los Angeles County Jail Plan Independent Review and Comprehensive Report* (Jail Plan Report). Option 1B recommended continued evaluation of renovating the facility at the MLDC for a women's detention center. The Draft EIR has been prepared to evaluate the environmental impacts of pursuing the proposed Project, in compliance with this Board of Supervisors directive.



MIRA LOMA WOMEN'S DETENTION CENTER PROJECT
PUBLIC MEETING- DECEMBER 8, 2015
6:00 TO 8:00 PM

COMMENTS:

No need for a women's detention center. We should focus on other things.

} Llamas-1

NAME:

NAOMI LLAMAS

ADDRESS:

E-MAIL:

llamasnaomi15@gmail.com

Naomi Llamas

Llamas-1

This comment relates to the merits of the proposed Project, and not the environmental analysis included in the Draft Environmental Impact Report (EIR) or the environmental impacts of the Project. This Final EIR, including all comments submitted to the County on the Draft EIR, will be provided to the County of Los Angeles Board of Supervisors. Therefore, your concerns will be presented directly to the decision makers prior to consideration of Project approval.



MIRA LOMA WOMEN'S DETENTION CENTER PROJECT
PUBLIC MEETING- DECEMBER 8, 2015
6:00 TO 8:00 PM

COMMENTS:

To Mr. Matthew Diaz:

I write as a concerned citizen and resident of LA county regarding the plan to move forward with the building of a new women's jail in Lancaster. The construction of this jail will only harm families - specifically poor families who are already disadvantaged. The construction of this jail is also a poor use of tax payers' money. It costs more to house people in jail than to enter people into community assistance programs. There is also a very alarming rate of Valley Fever among CA prisoners and also hazardous materials that will put my resident in harm. Please consider this and other citizens' pleas to stop the plan for this construction.

Montague-1

Montague-2

Montague-3

Montague-4

NAME: Elliot Montague
ADDRESS: 81912 Kodak Dr Los Angeles CA 90026
E-MAIL: elliottrenor@gmail.com

Elliot Montague

Montague-1

This comment relates to the merits of the proposed Project and not the environmental analysis included in the Draft EIR or the environmental impacts of the Project. Purely social effects of a project are beyond the scope of CEQA analysis, which focuses on the proposal's effect on the physical environment. This Final EIR, including all comments submitted to the County on the Draft EIR, will be provided to the County of Los Angeles Board of Supervisors. Therefore, your concerns will be presented directly to the decision makers prior to consideration of Project approval.

Although the Project site has been unoccupied since 2012 as discussed in Section 2.0, Environmental Setting, the Project site has generally been in operation and providing various detention/jail functions since 1945 - 1946, when the California Youth Authority began to run a vocational school for juvenile offenders at the site. In the mid-1950s, the Mira Loma Detention Center (MLDC) operated as a medium-security facility until it ceased operations for the first time in 1979. It reopened in 1983 and was expanded with the construction of several new buildings in 1986. The facility was repurposed for female inmates and was known as the Mira Loma Female Honor Ranch, but was closed again in 1993. The MLDC reopened for use in 1997 by the U.S. Immigration and Customs Enforcement (ICE) to house undocumented immigrants until their immigration cases were decided, and it operated in that capacity until 2012. The site has not housed inmates since that time. The MLWDC Project proposes the adaptive reuse, renovation, and expansion of the majority of the buildings at MLDC, which is an existing County asset. The redevelopment of the property would avoid the costs associated with constructing a new facility.

The Project will offer general education classes, computer training, general and vocational career technical education, college courses, career counseling, a learning resource center, a library and computer labs, culinary classes, and indoor/outdoor recreation for inmates. Other services include religious services, counseling services, and community transition services. Participation in classes, training, and other activities will be scheduled for each inmate according to individual evaluation, interests, needs, and availability.

Course selections will be determined based on a student's needs for specific services, and students' interest levels. Courses will be offered during three blocks of time each weekday (morning, afternoon, and evening), providing opportunities for inmates to be enrolled in multiple courses. Programs are also divided into three categories based on program intensity: all-day, half-day, and evening programs. Examples of all-day programs (morning and afternoon) include culinary arts programs, cosmetology programs, and Prisoner Assisted Community Enhancement (PACE). Examples of half-day programs (morning or afternoon) include: small engine repair; animal grooming/training; social media management and marketing/office assistant; automotive detailing, windshield and headlight repair; and recycling. Examples of evening programs include: computer coding; small business entrepreneurship; community college; Associate of Arts Degree; and General Education. Other programs include prenatal programs, volunteer programs; peer mentoring; physical education; dance; arts and crafts; a commissary program; and book clubs.

In addition, the Board of Supervisors has adopted numerous recent actions to reduce the number of people who are incarcerated in Los Angeles County, particularly those with mental illness and/or substance use disorders. The Board of Supervisors' 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 in a document entitled "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”.

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 Countywide Criminal Justice Coordination Committee. All Advisory Board members participated in the Countywide 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 of Los Angeles Chief Executive Office (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 Re-Entry (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 of Supervisors determined the Office will be a part of the Department of Health Services and the Director of the Office will report to the Director of the Department of Health Services. The Director of this Office will be 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, the Superior Court, the Public Defender, the Alternate Public Defender, Probation, the District Attorney, Mental Health, Public Health, and Health Services.

The Office will oversee Countywide diversion efforts including a system of integrated mental, physical and public health care services and supportive housing for those at risk of homelessness who are re-directed 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 of Supervisors directed that future budget allocations be a part of the annual budget process. On September 1, 2015, the Board of Supervisors also directed that the Office distribute funding so at least 1,000 individuals would be diverted across all intercept points within the criminal justice system.

The Criminal Justice Mental Health Advisory Board report of August 2015 concluded that even with increased opportunities for diversion from a jail environment, there will still be a need for mental health treatment in jails, and that diversion efforts can reduce, but will not eliminate, the need for the County to operate detention facilities. In light of the County's diversion efforts, the Board of Supervisors directed that, for purposes of on-going study and evaluation in the environmental review process, the maximum size of the proposed women's detention center at

Mira Loma in Lancaster would remain at 1,604 beds. In addition the Board of Supervisors reduced the maximum proposed size by approximately 1,000 beds, for purposes of the environmental review of a separate proposed treatment and detention center addressing needs of incarcerated men and women with mental illness and/or substance use disorders at the site of the current Men's Central Jail in downtown Los Angeles. In summary, the Board of Supervisors has taken steps to reduce the number of people who are incarcerated in Los Angeles County.

Montague-2

Coccidioidomycosis, also known as Valley Fever, and its potential impact on potential future inmates and County staff is discussed in Section 4.2, Air Quality. A summary of hazards associated with the *Coccidioides* spores (i.e., the fungus that causes Valley Fever) is provided as are summaries of trends related to Valley Fever in Los Angeles County, as inventoried and reported by the Los Angeles County Department of Public Health (LACDPH), which was consulted during the preparation of the Draft Environmental Impact Report (EIR).

The Draft EIR summarizes the LACDPH *2013 Annual Morbidity Report*, which presents the recent trends related to Valley Fever in Los Angeles County, including the increasing incidence rate within the last ten years. Data included in this report show the incidence in Valley Fever in Service Planning Area (SPA) 1 (i.e. Antelope Valley) from 2009 to 2013. The number of incidents of Valley Fever infection spiked in 2011 in SPA 1 with 93 reported cases, which represented 30 percent of cases in Los Angeles County, with an incidence rate of 25 per 100,000 people. The incidence rate decreased to 74 reported cases in both 2012 and 2013. As such, in 2013, SPA 1 represented approximately 20.4 percent of the total reported cases in Los Angeles County, with an incidence rate of 19 per 100,000 people. SPA 1 has the highest infection rate in Los Angeles County (LACDPH 2013).

However, the rate of Valley Fever infection in Los Angeles County, and the Antelope Valley specifically, is substantially less than in neighboring Kern County, which had a 2013 infection rate of 276 per 100,000 people in the north valley region (KCPHSD 2016). The eastern portion of San Luis Obispo County had Valley Fever infection rates ranging from 205 to 257 per 100,000 people between 2007 and 2012. (SLOCPHD 2014). Therefore, although the Antelope Valley has the highest rates in Los Angeles County, the rates are well below rates found nearby counties where Valley Fever is endemic.

The overall incidence rate of Valley Fever in the Antelope Valley was not determined to warrant changes in the County's protocol for disease prevention, notwithstanding the fact that the County health and public health officials are well educated on the condition; are familiar with its incidence in the County and elsewhere in the state; and are involved in research and education on the subject of Valley Fever.

Also, as demonstrated in Section 4.2, Air Quality the California Department of Corrections and Rehabilitation (CDCR) has not identified the Lancaster area as being a geographic location that requires screening or interventions for the State prison population with regard to exposure to Valley Fever (CDCR 2013). Additionally, the LACDPH has not identified the previous ICE detainee population at MLDC, the future inmate population at the MLWDC, or the earlier occupants at the High Desert Health System (HDHS) Multi-Ambulatory Care Center (MACC) (the adjacent hospital facility, which has relocated in Lancaster) as requiring the implementation of health screening protocols or other measures to address potential Valley Fever exposure.

The operation of the MLWDC will follow standard Sheriff's Department procedures for medical care and prevention with regard to health care for inmates in general, and Valley Fever

specifically, and the Sheriff's Department will continue to coordinate with LACDPH (Masis 2015). The LACDPH is the designated County agency with the mandate to protect health, prevent disease, and promote the health and well-being of all persons within Los Angeles County. As such, any future changes in LACDPH policies that may be made regarding Valley Fever for inmate populations will be implemented, as applicable, throughout the County jail system.

The MLWDC property is not located in an area determined to be hazardous to the health of local residents or visitors to the region. The Draft EIR concludes that the potential future inmate population's temporary placement into the Antelope Valley, which includes the inmates' participation in all indoor and outdoor activities at the MLWDC, would not constitute placement into a hazardous existing environmental setting that would require mitigation. Additionally, the operation of the proposed Project would not increase the prevalence of Valley Fever spores or otherwise exacerbate an existing environmental condition.

Montague-3

The Project site is listed in government databases due to past hazardous material uses. However, the Project site was never operated as a site that accepted hazardous wastes. The Project site is on the list of Leaking Underground Storage Tanks (LUST) Sites, but the leaking underground storage tanks have been removed and the affected area cleaned up. The County Department of Public Works oversaw the remediation and issued the "no further action" letter. The California Department of Toxic Substances Control (DTSC) lists the Polaris Flight Academy with a status of "inactive-needs evaluation". As part of the Phase II Environmental Site Assessment (ESA), soil borings collected in the area of the possible former location of the airstrip did not detect any contaminants that would require further action (Converse 2015). Thus, the listing of the site in government databases was based on past uses that no longer pose hazards.

As part of the environmental analysis for the Draft EIR, a Phase I ESA has been prepared that reviewed past and current uses and site conditions and identified Recognized Environmental Concerns (RECs) on the Project site and surrounding area. The Phase I ESA is provided in Appendix E-1 of the Draft EIR. Subsequent to the Phase I ESA, a Phase II ESA was prepared that included soil sampling to determine if soil contamination is present on the site. The Phase II ESA is provided in Appendix E-3 of the Draft EIR. In addition, an Asbestos and Lead Based Paint Survey Report was completed to identify the building components that contained asbestos and lead-based paint. The Asbestos and Lead Based Paint Survey Report is provided in Appendix E-2 of the Draft EIR. These reports are summarized in Section 4.7, Hazards and Hazardous Materials of the Draft EIR.

The Project must comply with existing regulatory requirements (RRs) for the proper handling of hazardous wastes, including transportation, treatment, storage, and disposal; repair and/or removal of underground storage tanks based on applicable standards; and practices that would protect the demolition and construction crews from asbestos and lead exposure. In addition, the Project must incorporate mitigation measures (MMs) for the handling of suspected asbestos-containing materials and lead-based paint; an Operations and Maintenance Plan for regular inspection of any asbestos-containing materials; and testing and repair of underground storage tanks prior to use. Thus, existing hazardous materials and wastes would be removed from the Project site and future hazardous materials use would comply with applicable regulations to prevent hazards to future inmates. In summary, compliance with RRs and implementation of MMs set forth in the Draft EIR would prevent public health and safety hazards to inmates, employees, visitors and other individuals at the Project site.

Montague-4

This Final EIR, including all comments submitted to the County on the Draft EIR, will be provided to the County of Los Angeles Board of Supervisors. Therefore, your concerns will be presented directly to the decision makers prior to consideration of Project approval.

From: launa nash [mailto:launanash@sbcglobal.net]
Sent: Tuesday, January 12, 2016 10:18 AM
To: CEO Environmental <environmental@ceo.lacounty.gov>
Subject: Jail Construction

Good day:

Please do not go forward with building a women's jail in Lancaster. Alternate means can be used rather than incarcerating more women. The funds can be used for alternate forms of punishment/rehabilitation.
The jail population should be decreased rather than increased.

} Nash-1

With regards,

Launa Nash
Los Angeles, CA

Launa Nash (January 12, 2016)

Nash-1

Regarding the commenter's concerns about the expansion of jails, the purpose of and need for the Project is described in detail in Section 3.1, Project Background, of the Draft EIR. That section provides information regarding the County's existing detention facilities, relevant regulatory mandates, and studies analyzing future facility needs, including for housing of female inmates. The proposed jail planning is set in the context of the County's other programmatic and financial support of diversion from incarceration. The County has a concurrent focus on diversion from incarceration as it considers this Project. Therefore, the proposed Project is consistent with the Board of Supervisor's consideration of policy issues addressing alternative approaches to incarceration, including the commenter's suggestions regarding out-of-custody alternatives.

The Board of Supervisors has adopted numerous recent actions to reduce the number of people who are incarcerated in Los Angeles County, particularly those with mental illness and/or substance use disorders. The Board of Supervisors' 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 in a document entitled "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".

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 Countywide Criminal Justice Coordination Committee. All Advisory Board members participated in the Countywide 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 of Los Angeles Chief Executive Office (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 Re-Entry (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 of Supervisors determined the Office will be a part of the Department of Health Services and the Director of the Office will report to the Director of the Department of Health Services. The Director of this Office will be 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, the Superior Court, the Public Defender, the Alternate Public Defender, Probation, the District Attorney, Mental Health, Public Health, and Health Services.

The Office will oversee Countywide diversion efforts, including a system of integrated mental, physical, and public health care services and 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 of Supervisors directed that future budget allocations be a part of the annual budget process. On September 1, 2015, the Board of Supervisors also directed that the Office distribute funding so at least 1,000 individuals would be diverted across all intercept points within the criminal justice system.

The Criminal Justice Mental Health Advisory Board report of August 2015 concluded that, even with increased opportunities for diversion from a jail environment, there will still be a need for mental health treatment in jails and that diversion efforts can reduce, but will not eliminate, the need for the County to operate detention facilities. In light of the County's diversion efforts, the Board of Supervisors directed that, for purposes of ongoing study and evaluation in the environmental review process, the maximum size of the proposed women's detention center at Mira Loma in Lancaster would remain at 1,604 beds. In addition the Board of Supervisors reduced the maximum proposed size by approximately 1,000 beds, for purposes of the environmental review of a separate proposed treatment and detention center addressing needs of incarcerated men and women with mental illness and/or substance use disorders at the site of the current Men's Central Jail in downtown Los Angeles. In summary, the Board of Supervisors has taken steps to reduce the number of people who are incarcerated in Los Angeles County.

This Final EIR, including all comments submitted to the County on the Draft EIR, will be provided to the County of Los Angeles Board of Supervisors. Therefore, your concerns will be presented directly to the decision makers prior to consideration of Project approval.



MIRA LOMA WOMEN'S DETENTION CENTER PROJECT
PUBLIC MEETING- DECEMBER 8, 2015
6:00 TO 8:00 PM

COMMENTS:

After listening to this public meeting, I felt inspired to have my voice be heard and read. Mr. Diaz it is unjust in my mind to continue imprison a large and disproportion of marginalized folk. I urge you to please help the community community to prevent the social and environmental impacts that institutions like the Mira Loma Women's Detention Center continue to perpetuate!

Ortega-1

NAME: Jeronimo Ortega

ADDRESS: 10811 Ashton Ave. Los Angeles, CA 90024

E-MAIL: jeronimortega@gmail.com

Jerónimo Ortega

Ortega-1

This comment relates generally to the merits of the proposed Project, and not the environmental analysis included in the Draft EIR. The commenter generally refers to preventing social injustices on marginalized people and environmental impacts that "institutions like" the proposed Project "perpetuate". 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 Draft EIR for the proposed Project has been prepared in accordance with the California Environmental Quality Act (CEQA, *California Public Resources Code*, Sections 21000 et seq.) and the State CEQA Guidelines (14 *California Code of Regulations* [CCR]), and it addresses the potential direct, indirect, and cumulative impacts of the Project on all applicable environmental issue areas.

This Final EIR, including all comments submitted to the County on the Draft EIR, will be provided to the County of Los Angeles Board of Supervisors. Therefore, your concerns will be presented directly to the decision makers prior to consideration of Project approval.



MIRA LOMA WOMEN'S DETENTION CENTER PROJECT
PUBLIC MEETING- DECEMBER 8, 2015
6:00 TO 8:00 PM

COMMENTS:

I think building a jail will have many ^{negative} environmental impacts. From the amount of money it will be required to build, to the susceptibility to Valley fever.

} Ortiz-1

NAME: Mario Ortiz

ADDRESS:

E-MAIL:

Mario Ortiz

Ortiz-1

Regarding the commenter's concern about the building of a new jail and the associated costs, although the Project site has been unoccupied since 2012 as discussed in Section 2.0, Environmental Setting, the Project site has generally been in operation and providing various detention/jail functions from 1945-1946 until 2012. The MLWDC Project proposes the adaptive reuse, renovation, and expansion of the majority of the buildings at MLDC, which is an existing County asset. The redevelopment of the property would avoid the costs associated with constructing a new facility.

The Draft Environmental Impact Report (EIR) for the proposed Project has been prepared in accordance with the California Environmental Quality Act (CEQA, *California Public Resources Code*, Section 21000 et seq.) and the State CEQA Guidelines (14 *California Code of Regulations* [CCR]), and addresses the potential direct, indirect, and cumulative environmental impacts of the Project on all environmental issue areas. Section 5.0, Project Alternatives, was prepared in accordance with Sections 15126.6(a) through 15126.6(f) of the State CEQA Guidelines. As demonstrated throughout the Draft EIR, all potentially significant impacts have been reduced to levels that are less than significant through the identified mitigation measures, and no significant unavoidable environmental impacts would result from Project implementation.

Regarding the comment on susceptibility to coccidioidomycosis, known as Valley Fever, its potential impact on potential future inmates and County staff is discussed in Section 4.2, Air Quality. A summary of hazards associated with the *Coccidioides* spores (i.e., the fungus that causes Valley Fever) is provided and includes trends related to Valley Fever in Los Angeles County, as inventoried and reported by the Los Angeles County Department of Public Health (LACDPH), which was consulted during the preparation of the Draft EIR.

The MLWDC property is not located in an area determined to be hazardous to the health of local residents or visitors to the region. The Draft EIR concludes that the potential future inmate population's temporary placement into the Antelope Valley, which includes the inmate's participation in all indoor and outdoor activities at the MLWDC, would not constitute placement into a hazardous existing environmental setting that would require mitigation. Additionally, the operation of the proposed Project would not increase the prevalence of Valley Fever spores or otherwise exacerbate an existing environmental condition.

In addition, please see the more detailed response on this issue in the response to Form Letter-5 relating to Valley Fever, which is included in Section 2.3.1 of this Final EIR.



MIRA LOMA WOMEN'S DETENTION CENTER PROJECT
PUBLIC MEETING- DECEMBER 8, 2015
6:00 TO 8:00 PM

COMMENTS:

The new women's jail has been pitched as a humane, open space/out door, campus like facility. But, what about the valley fever exposure that inmates would suffer from. We don't need more jails. We need services in our community

Pena-Vargas-1

NAME: Carmen Peña-Vargas
ADDRESS: 4434 Radium Dr. LA, CA 90032
E-MAIL: _____

Camela Pena-Vargas

Pena-Vargas-1

Regarding the commenter's concern about Valley Fever, its potential impact on potential future inmates and County staff is discussed in Section 4.2, Air Quality. A summary of hazards associated with the *Coccidioides* spores (i.e., the fungus that causes Valley Fever) is provided, as well as summaries of trends related to Valley Fever in Los Angeles County, as inventoried and reported by the Los Angeles County Department of Public Health (LACDPH), which was consulted during the preparation of the Draft Environmental Impact Report (EIR).

The Draft EIR summarizes the LACDPH 2013 *Annual Morbidity Report*, which presents the recent trends related to Valley Fever in Los Angeles County, including the increasing incidence rate within the last ten years. Data included in this report show the incidence in Valley Fever in Service Planning Area (SPA) 1 (i.e., Antelope Valley) from 2009 to 2013. The number of incidents of Valley Fever infection spiked in 2011 in SPA 1 with 93 reported cases, which represented 30 percent of cases in Los Angeles County, with an incidence rate of 25 per 100,000 people. The incidence rate decreased to 74 reported cases in both 2012 and 2013. As such, in 2013, SPA 1 represented approximately 20.4 percent of the total reported cases in Los Angeles County, with an incidence rate of 19 per 100,000 people. SPA 1 has the highest infection rate in Los Angeles County (LACDPH 2013).

However, the rate of Valley Fever infection in Los Angeles County, and the Antelope Valley specifically, is substantially less than in neighboring Kern County, which had a 2013 infection rate of 276 per 100,000 people in the north valley region (KCPHSD 2016). The eastern portion of San Luis Obispo County had Valley Fever infection rates ranging from 205 to 257 per 100,000 people between 2007 and 2012 (SLOCPHD 2014). Therefore, although the Antelope Valley has the highest rates in Los Angeles County, the rates are well below rates found nearby counties where Valley Fever is endemic.

The overall incidence rate of Valley Fever in the Antelope Valley was not determined to warrant changes in the County's protocol for disease prevention, notwithstanding the fact that the County health and public health officials are well educated on the condition; are familiar with its incidence in the County and elsewhere in the state; and are involved in research and education on the subject of Valley Fever.

Also, as demonstrated in Section 4.2, Air Quality the California Department of Corrections and Rehabilitation (CDCR) has not identified the Lancaster area as being a geographic location that requires screening or interventions for the State prison population with regard to exposure to Valley Fever (CDCR 2013). Additionally, the LACDPH has not identified the previous U.S. Immigration and Customs Enforcement (ICE) detainee population at the MLDC, the future inmate population at MLWDC, or earlier occupants at the High Desert Health System (HDHS) Multi-Ambulatory Care Center (MACC) (the adjacent hospital facility, which has relocated in Lancaster) as requiring the implementation of health screening protocols or other measures to address potential Valley Fever exposure.

The operation of the MLWDC will follow standard Sheriff's Department procedures for medical care and prevention with regard to health care for inmates in general, and Valley Fever specifically, and the Sheriff's Department will continue to coordinate with LACDPH (Masis 2015). The LACDPH is the designated County agency with the mandate to protect health, prevent disease, and promote the health and well-being of all persons within Los Angeles County. As

such, any future changes in LACDPH policies that may be made regarding Valley Fever for inmate populations will be implemented, as applicable, throughout the County jail system.

The MLWDC property is not located in an area determined to be hazardous to the health of local residents or visitors to the region. The Draft EIR concludes that the potential future inmate population's temporary placement into the Antelope Valley, which includes the inmate's participation in all indoor and outdoor activities at the MLWDC, would not constitute placement into a hazardous existing environmental setting that would require mitigation. Additionally, the operation of the proposed Project would not increase the prevalence of Valley Fever spores or otherwise exacerbate an existing environmental condition.

Pena-Vargas-2

This comment does not specifically address the proposed Project, nor the environmental analysis included in the Draft EIR or the environmental impacts of the Project. Purely social effects of a project are beyond the scope of CEQA analysis, which focuses on the proposal's effect on the physical environment. This Final EIR, including all comments submitted to the County on the Draft EIR, will be provided to the County of Los Angeles Board of Supervisors. Therefore, your concerns will be presented directly to the decision makers prior to consideration of Project approval.

Sheila Pinkel
210 N. Ave. 66
Los Angeles, Ca. 90042
(323) 256-1853
spinkel4@gmail.com

January 6, 2016

County of Los Angeles Chief Executive Office
Capital Programs Division
754 Kenneth Hahn Hall of Administration
500 West Temple St.
Los Angeles, CA. 90012
Attn: Mira Loma Environmental Impact Report
environmental@ceo.lacounty.gov

Dear Authors of the Mira Loma EIR:

Attached are my questions and comments about the most recent version of the Mira Loma EIR that was publicly presented in Lancaster on Tuesday, December 8, 2015. Below are some general comments and attached are comments specific to sections of the EIR.

1. Continuing to incarcerate women, especially non-non-nons rather than establishing diversion alternatives perpetuates a draconian incarceration system and results in disastrous effects on their families. In this EIR there is no mention of alternatives to incarceration. } Pinkel-1
2. Placing a new jail in an area with extreme drought conditions will potentially result in an unusable facility if drought conditions reflected in Exhibit 1 at the end of this document continue. This area has already experienced significant subsidence due to drought. } Pinkel-2
3. Attorneys familiar with the problem of Valley Fever have indicated that this site MUST include in its design seals around all doors and windows, especially external doors and windows, to limit the possibility for Valley Fever spores to enter MLWDC.
Placing women in an area recognized as a site for Valley Fever, where 40% of the women will potentially come down with flu like symptoms and black and women of Philippine origin are specially susceptible to Valley Fever is a potential health disaster. Will black and Philippino women be housed elsewhere? } Pinkel-3
4. Creating a restrictive visitation system where only a small percentage of the minimum to medium security women will be allowed contact visits and these will be limited to ½ - 1 hour slots in an enclosed room is antithetical to the concept of creating a 'Women's Village'. MRWDC is not analogous to Lynwood Jail. It will require at least 100 extra miles of travel for visitors. A visitation } Pinkel-4

system in which visitors can come all day if they choose, can have meals, possibly from vending machines, can bring children, can go indoors and outdoors where there are picnic tables and play areas for children, is much more in keeping with the vision of a 'Women's Village'.

5. The two community meetings in 2014 and 2015 were not advertised in such a way to adequately let community members know about the meetings. Hence, almost no community members were present. I recommend that another EIR community meeting be held so that the community can really be apprised of this project.

Pinkel-4
cont.

Pinkel-5

I have spent a great deal of time reviewing this EIR because of its potential impact on so many people and will appreciate responses to my questions and/or comments.

Sincerely,
Sheila Pinkel
Emerita Professor, Pomona College

Preliminary comments: COMMUNITY EIR MEETINGS

Both EIR meetings in Lancaster, 2014 and 2015, had very few residents from Lancaster in attendance because in both cases, the location of the meetings was poorly advertised. Most people do not regularly check government websites. The only truly public advertisement of the meeting in 2014 as mentioned on page 1-5 of the current EIR was a one day notice in the *Antelope Valley Press* and the *Country Journal* and a six day notice on the *Antelope Valley Times* website. No effort was made to post signage in the library, the city hall or other public buildings about the meetings or readily accessible information that a copy of the EIR was available in the Lancaster Library for public review and there was no signage posted anywhere advertising the 2014 EIR meeting.

Last year we were given the incorrect address for the EIR meeting as 701 W. Kettering Ave. when it was actually held in an unnamed building on W. Jackman St. with no outdoor signage there indicating that was the place where the meeting was being held. There was not public notice of the change in venue. I was fortunate enough to come to Lancaster an hour early. I went to City Hall right before it closed and asked the clerk where the meeting was. It was only then that I learned of the change in address. If I had been five minutes later, City Hall would have been closed and I would have never found the meeting.

This year a (NOA) of the Draft EIR was published in the *Antelope Valley Press*, *Acton Aqua Dolce News* and *Los Angeles Daily News* as well as posted on the *Antelope Valley Times* website. However, we don't know how many days this notice was posted or how the public was suppose to know that a copy of the draft EIR was available at the Lancaster Library. The 2015 meeting was held in an un-named building with no visible address at the end of a torturous and long labyrinth of a parking lot that we were supposed to locate in the dark. There was no obvious building with an address of 43000 30th Street East, the advertised address. If public meetings are held in obscure buildings, then a map showing exactly where the building is located must be provided if a good faith effort is made to publicize these meetings.

I spoke with a few local residents who said that they found out about the meeting quite by accident and had no idea of how to find the EIR to review it before the meeting. Because this happened two years in a row I call this a problem with the advertising process itself. Whatever process has been employed to include the Lancaster public in the review of the current EIR document, it has failed. Because this process has not really included the population affected by the building of the Mira Loma Women's Detention Center, another EIR meeting needs to be held in Lancaster in January, 2016, after adequately advertising the meeting to the Lancaster community so they can have an opportunity to review the Mira Loma EIR and respond. Churches, the new paper, library, Chamber of Commerce, city officials, schools, all need to be apprised with posters of this new meeting day and time and how they can find the EIR for review. The date for written comments needs to be moved to February.

Pinkel-6

COMMENTS AND QUESTIONS ABOUT THE MIRA LOMA EIR:

At the beginning of this report it would be helpful if authors provided a list of abbreviations like MLWDC – Mira Loma Women’s Detention Center, so that readers could refer to them.

} Pinkel-7

ES-2: If “The Project is designed to deliver a more normative environment than current detention facilities housing women...” why is visitation arrangement restricted to 40 booths and one half – one hour contact visits? People will have travelled over three hours in each direction to get to the site. In other detention facilities I have visited I have been able to stay there all day if I choose, eat meals which I purchase from machines with the person I visited, bring children and go inside and outside to picnic and children’s play areas with the incarcerated person I was visiting. The current visitation structure is antithetical to the goal of making a ‘more normative environment’ and needs to be revisioned. It certainly does not allow women to have visits with children and loved ones in an environment conducive for visiting.

} Pinkel-8

ES-3: Why are these alternatives mentioned here since the LA County Board of Supervisors voted to move forward with MLWDC? These are no longer viable alternatives.

} Pinkel-9

Alternatives 1A, 1B, and 3 do not adequately clarify the environmental impact if the female inmate population continues to be housed at the CRDF. The MLWDC is not a stand-alone project. The plan is that once women have been transferred from CRDF to MLWDC, men from Men’s Central Jail and Twin Towers will be transferred to CRDF where they will stay until the new central jail is built. However, if the MLWDC does not happen and women at CRDF are not moved, then where will the men from Men’s Central Jail or Twin Towers be housed during the construction of the new Men’s Central Jail? Or, will not building MLWDC stop the construction of Men’s Central Jail as well? The relationship to and dependence on the MLWDC to these other projects needs to be clarified.

} Pinkel-10

If the alternatives listed here are really included as good faith alternatives, then why are there not EIRs for those alternatives as well so that a real comparison of their relative environmental impacts can be made?

} Pinkel-11

ES-5: “While Alternative 1A..., this alternative would not meet the majority of the Project’s basic objectives.” One of the basic objectives, CRDF providing a place for men from Men’s Central Jail and Twin Towers while it is under construction, **the imperative for both plans, MRWDC and Men’s Central Jail and Twin Towers, is missing from this discussion. They are linked and this needs to be clarified.**

} Pinkel-12

- ES-6: Primary areas of known controversy:
 • **opposition to expansion of any jail facilities... EIR fails to address the possibility of social and diversion programs instead of expansion of jail facilities. Jurisdictions throughout the country are currently implementing alternatives to incarceration. This needs to be done in Los Angeles as well.** Pinkel-13
- ES-7: “Prior to mitigation...No significant unavoidable impacts will occur after mitigation.” **How can the authors make this claim that no significant ‘unavoidable’ impacts will occur after mitigation? Unexpected things do happen.** Pinkel-14
- 1-9: While CEQA Guidelines encourage public agencies to ‘develop and publish thresholds of significance’ in determining significance of an environmental impact, throughout this report assertions are made that the authors have determined that there are none or negligible environmental impacts **without** providing “thresholds...of identifiable quantitative, qualitative or performance-level criteria used to determine non-compliance or compliance.” I will try to point them out as I find them in this report, referring to them as Thresholds of Significance (TS). Pinkel-15
- 3-1: This report asserts that AB 109 allowed non-non-nons to serve their sentence in county jails rather than state prisons. **However, that was not the only option for implementing AB 109 as described below in the description of Santa Cruz use of AB 109 funds.** So this statement of the implementation of AB 109 needs to be clarified as indicated below:
 “Approximately \$5.2 million was allocated by the state to the county (of Santa Cruz) for AB 109-related costs in fiscal year 2012-2013. Rather than spending the full amount for incarceration expenses, the county elected to allocate one-third to corrections, one-third to probation, and one-third to intervention services and rehabilitation programs.
 “A key feature of the Partnership is the Sheriff’s Custody Alternatives Program (CAP). Non-violent, non-sexual, non-serious offenders are given the opportunity of an incarceration reduction and/or release with an ankle monitor. Between October 2011 and December 2012, 292 inmates were released with monitors. This has saved the county \$1.9 million when compared to the cost of housing these offenders.” Source: [http://www.co.santa-cruz.ca.us/grandjury/GJ2013_final/AB_109 - A Year in Review.pdf](http://www.co.santa-cruz.ca.us/grandjury/GJ2013_final/AB_109_-_A_Year_in_Review.pdf) Pinkel-16
- This report indicates a trend in recent years of increased inmate population within the LA County jail system. In fact, **sentences for women have been** Pinkel-17

- getting longer without anyone from the Sheriff's Department able to explain why, which partially explains the reason for overcrowding. This needs to be addressed.** } Pinkel-17 cont.
- 3-4: **In September 2015, while the LACBOS established a new Office of Diversion and Re-entry with limited funding; they also affirmed in prior meetings that they would insist that non-non-nons serve their full sentence, unlike the County of Santa Cruz, opting to continue to saddle tax payers with the cost of incarceration of present and future non-non-nons. This needs to be pointed out because had they made decisions like the County of Santa Cruz, the construction of MLWDC would not be necessary or appropriate for most of the women being incarcerated.** } Pinkel-18
- 3.2.1 **If the goal of this project is to reduce recidivism, then building a new jail is not the answer; rather community based solutions are. This new jail is not the solution; it is the problem. The goals of this project as enumerated in this section are misguided.** } Pinkel-19
- Proposed Site Plan: **Design of Building 3 for visitation needs to be redesigned to allow for extended visitation with indoor/outdoor access and play areas for children so that visitors and incarcerated women and their children can have normalized contact experiences with access to food from vending machines for extended periods of time on weekends. The current plan for 40 booths and one half to one hour periods for visitation is antithetical to the goals of generating a 'woman's village'.** } Pinkel-20
- What will the charge be for using video visitation rather than in person visitation? What will the time restrictions be on these visits? Will an incarcerated woman have a private place for video visits? Will those video visits be constantly interrupted by the message that this is a MLWDC visit, as are telephone conversations constantly interrupted? Will incarcerated women still have phone access for telephone visits as well? Will these phone visits be constantly interrupted with the message that this is phone conversation from MLWDC? } Pinkel-21
- 3-9: **Will women in Transition Housing (Buildings G and H) have additional visitation opportunities since they are living in transitional housing?** } Pinkel-22
- Since this is a 'woman's village', a low to medium security facility, why is visitation so restrictive, i.e. non-contact personal and family visits, supervised contact visits in booths with immediate family members and children of extremely limited duration? (see comments in ES-2 above). This plan is inhumane.** } Pinkel-23

- Where will classes in creative writing, music, art, drama, dance conducted by teachers from the community be held?** The stats are that providing cultural curricula is an important way to reduce recidivism. There are no plans for these kinds of classes in this EIR. } Pinkel-24
- 3-10E: **Who does the term ‘licensed medical personnel’ refer to? Since staff will be asked to provide urgent care services, will medical doctors be at the facility as well?** } Pinkel-25
- 3-10H: **Will incarcerated women have access to computers, computer classes? What does the ‘telecommunications space in each building’ refer to?** } Pinkel-26
- 3-11: **3.3.3: Architecture: How are the cells of the women at MLWDC going to be less institutional than conventional prison cells? Will their size be any different?** } Pinkel-27
- 3.3.3: **Lighting: In bunk bed arrangements, typically the woman on the bottom bunk cannot sit up on her bunk to read and also the lighting is not sufficient to read, especially at night. Will bunks be built to allow a woman to sit up, even if she is in a lower bunk, and lighting in each cell be constructed to allow each woman to be able to read on her bunk without disturbing the other person in the room?** } Pinkel-28
- 3-13: **Water Infrastructure:**
- 3-14: **Will the Inmate Video Visitation System allow the incarcerated woman to have private uninterrupted conversations? How much will use of this cost?** } Pinkel-29
- 3-17: **3.3.4: 70% of the women at MLWDC be incarcerated while awaiting court sentences at the pre-trial phase? Why are they in jail at all? They serve an average of 107 days while waiting for their trial? If we stopped incarcerating women before they are prosecuted, we wouldn’t need this jail. If they are found not guilty, then 107 days will have been stolen from the women and their families.** } Pinkel-30
- If the 30% of women at MLWDC who are non-non-nons were allowed out on probation and possibly ankle bracelets, then no one would have to be incarcerated there. Since “93% of the LASD female inmates have the need for substance use programs” why not provide these programs as community based programs and let them out of jail? They could go to all of the programs mentioned in this section as community based programs. If the County is really interested in cost reduction, this would be a lot cheaper than incarcerating them.** } Pinkel-31

- 3-18: **Where in this EIR is a provision for training of sheriffs who are sensitive to the needs of women? That is as important as training of incarcerated women.** } Pinkel-32
- 3-19: This EIR says that women will be able to earn an AA degree there. **Will women be able to earn a BA degree there? What Career Technical Education (CTE) will be provided? I have observed in other incarceration facilities that courses billed like that provide incarcerated people with no or very limited employable skills. Who will assess the quality and effectiveness of this education?** } Pinkel-33
- Will work opportunities be provided for incarcerated women at MLWDC? A description of this needs to be included.** } Pinkel-34
- 3-24: Table 3-5: **Visitation Protocol Comparison: Because this is a minimum to medium security prison why are non-contact visitations allowed for anyone? Why is visitation by appointment only? Why are contact visits limited to one half to one hour? The average visitor will have to travel 2-3 hours each way to get to MLWDC. They should be able to stay all day if they choose and bring children.** } Pinkel-35
- How much will video visits cost? Why are they only available to inmates housed in privileged or transitional housing areas? This is only a fraction of the women housed at MLWDC. Why don't all women have access to video visitations?** } Pinkel-36
- 3-25: **Why is there only one Video Visitation System (IVVS) at each of the seven sites?** Certainly the needs of the community will be greater than that, especially at the Lynwood facility since the women will be coming from there. } Pinkel-37
- Since women will be able to have two or more non-contact visits via phone or video per week, how many phones and video stations need to be installed to give women the ability to make phone calls or have video conferences? In my experience, there are usually not enough phones to handle the needs of the incarcerated. What will be the calculation here? For instance, there will be 1,604 women. If each of them wants to make one phone call during the weekend, will there be enough phones to handle their needs?** } Pinkel-38
- What provisions will be made so that a woman and her attorney can have a private visit in a private room?** } Pinkel-39
- 4.2-4 Climate and Meteorology:
- "The MDAB is classified as a dry-hot desert climate." Because this area is so hot and dry, requiring water to be piped into the area to support MLWDC residents and staff, what argument is made for this being a suitable location for this jail?** } Pinkel-40

- While the average wind speed is 11.2 mph, how many days per year are wind speeds higher than average? Average wind speeds of 11.2 mph are high enough to disturb the soil and transport Valley Fever spores. This is relevant to the issue of spores from valley fever infecting residents of MLWDC.** } Pinkel-41
- 4.2-9 Valley Fever
- This EIR states that “SPA 1 (i.e. Antelope Valley) reported the highest incidence rate of coccidioidomycosis in Los Angeles County...” **Since 40 percent of people exposed to Valley Fever spores develop symptoms like “mild respiratory illness with flu-like symptoms that can last about a month” why is a jail being planned for an area with a high incidence of Valley Fever spores where at least 40% of the incarcerated women could be affected? What kind of care will be given to women who develop flu-like symptoms? What kind of care will be given to women who develop Valley Fever? How could LACDPH approve this plan with its “mandate to protect health, prevent disease and promote the health and well-being of all persons within Los Angeles County”4.2-21?** } Pinkel-42
- Since the incidence rate for blacks is the highest among racial groups and certain groups including “the elderly and people with respiratory illnesses or impaired lung function...” and Philipinos are more sensitive to airborne pollutants, will these women be housed in a different location than MLWDC?** } Pinkel-43
- 4.2-21 “...the future inmate population has the potential to be exposed to dust generated from soils within the Antelope Valley, which have the potential to contain coccidioidomycosis (i.e. Valley Fever) spores.” **Will MRWDC be added to the list of facilities with potential exposure to Valley Fever?** } Pinkel-44
- “Because the majority of the project site will be paved or landscaped, there are few opportunities for on-site soils to produce airborne dust.” Expert attorneys familiar with the problem of Valley Fever have indicated that this site MUST include in its design seals around all doors and windows, especially external doors and windows, to limit the possibility for Valley Fever spores to enter MLWDC.** } Pinkel-45
- 4.6-10 “...climate change would reduce California’s water supplies even as its growing population requires additional resources.” **How can this EIR justify placing a jail in a desert when it is well acknowledged that California’s drought is a present and future problem?** } Pinkel-46
- 4.8-7: “Approximately 292 square miles of the Antelope Valley has experienced subsidence of more than 1 foot, which has reduced aquifer storage by 50,000 acre-feet (DWR 2004).” **Why does the County consider this a suitable site for a new jail? At the project’s inception the geological profile is un-sustainable.** } Pinkel-47

- Because of this this project will require a 12 inch pipe connecting with LA County water supply to be built and water from The County used at the site. This will add a significant on-going cost for water to the project, at tax payers' expense. } Pinkel-48
- 4.8-19 **“As the Project does not...No cumulative impact on groundwater resource would occur with the Project.” This EIR fails to take into account that potentially at least 1,684 people either employed or families of the employed at MLWDC would move into the area and affect local groundwater supplies. Average water consumption per person in California is 79 gallons/day. Also, families of the incarcerated could potentially move to the area increasing demand on local water supplies. In addition, this EIR estimates a high volume of visitors on each of two weekend days. However, there is no calculation of how this influx of people to the area could impact local water resources.** } Pinkel-49
- 4.11-7 **Why are contact visitations permitted only for qualifying inmates? Isn't MLWDC a low to medium level jail? Shouldn't all residents be qualified for contact visits?** } Pinkel-50
- Why are visits limited to half or whole hour slots and no more than three people? If this was the inhumane visitation system at Lynwood, there is no justification to perpetuate it at MLWDC. Visitors will have traveled 2 or more hours to get to this site. In prisons I have visited I could stay all day, have a meal with the person I was visiting, sit in a room with other inmates and visitors, bring children and go inside and outside to picnic areas where there were places for the children to play. The visitation portion for this EIR needs to be redone to make it more humane and conform to the idea that this is a “woman's village” instead of a super max penitentiary.** } Pinkel-51
- 4.13-10 **Will there be monitoring of use of public transportation after MRWDC opens to determine if the bus and Metrolink options are adequate? Will the bus schedules at the Metrolink station be synced with the transit bus schedule of local buses to the jail site?** } Pinkel-52
- 4.13-20 **This EIR assumes that because of the 98 round trip mile average increase of distance that visitors will have to travel that they will be more prone to want to use the video visiting stations. However, video visitation is no replacement for contact visits and cannot be described as a replacement for contact visits. In other parts of this EIR it was estimated that there would be a maximum of 1,920 visits between residents and visitors per weekend day. However, in this section the number of contact visits per weekend day is 250 at one half to one hour intervals. Because all of the women housed at MRWDC are low to medium level offenders, all of the women should have the right to contact visitations, not just 250 selected persons.** } Pinkel-53

While Lynwood may have had ½ hour – one hour visitation schedule, there is not reason to replicate this inhumane visitation system at MLWDC. **The visitation portion of this EIR needs to be changed to describe more humane visitation that does not require appointments or limited duration for visitors, allows visitors including children to have food, possibly from machines, in a common area with residents, go inside and outside, have a play area for children and is available to ALL women housed at MRWDC.**

Pinkel-54

4.14-2 Because of MRWDC, how will the influx of visitors on the weekends and potential new residents to Lancaster as a result of this project impact Governor Brown’s EC of 4/15 requiring 25 percent statewide water reduction in potable urban water use? **Won’t this project place additional strain on the city to meet this state requirement since the water they will use will come for city wells and aquafer?**

Pinkel-55

4.14-18 The water supply assessment for this project is for the next 20 years. The report asserts that the reliability of future water supplies will be ensured ‘through continued implementation of programs for water banking; **purchase of new imported supplies; water transfers**, water conservation; and expansion of recycled water systems.’ While this dreamscape for future water for the area sounds good, there is no concrete analysis of where new imported water supplies or transfers will come from, **especially if the extreme drought conditions continue, or how much this import will cost taxpayers. If the New Supply Acquisition program mentioned on 4.14-23 doesn’t have any new supplies of water, what will be done?** At a time when the desertification of Southern California is taking place, when in 20 years this area may not be habitable because of lack of water, it is unacceptable to imagine placing women in a desert jail where future access to water is uncertain. As noted on 4.14-29, “...imported water from the SWP could experience large swings in available supply depending on rainfall and snowpack conditions....” Since imported water will be the main source of potable water for MLWDC, building a project with this level of uncertainty is unacceptable.

Pinkel-56

4.14-17 Short-Term Construction Impacts: Water sprayed on exposed soils for dust suppression during the four-year construction plan will come from **on-site wells. The volume of water used for the purpose of mitigating dust and illness from Valley Fever needs to be calculated in order to adequately determine whether this reduction of ground water is significant or not.** This calculation is missing in this report.

Pinkel-57

4.14-29 Drought conditions could result in purchase of water for \$10,000/afy with a need for 223afy, the cost to tax payers per year for water during drought conditions will be \$2,230,000. This needs to be clarified and added to the potential cost of the project.

Pinkel-58

Sheila Pinkel (January 6, 2016)**Pinkel-1**

The purpose of and need for the Project is described in detail in Section 3.1, Project Background, of the Draft Environmental Impact Report (EIR). That section provides information regarding the County's existing detention facilities, relevant regulatory mandates, and studies analyzing future facility needs, including for housing of female inmates.

As demonstrated in Section 5.0, Project Alternatives, an EIR must describe a range of reasonable and of potentially feasible alternatives to the proposed Project or to the location of the Project that would feasibly attain most of the basic Project Objectives but would avoid or substantially lessen any significant effects. An EIR is not required to consider alternatives that are infeasible. The range of alternatives is governed by a "rule of reason" that requires discussion of only those alternatives necessary for the County of Los Angeles Board of Supervisors (Board) to make a reasoned choice.

As demonstrated in Section 3.0, Project Description, on October 22, 2013, the Board authorized the evaluation of a proposal to use a portion of the Mira Loma Detention Center (MLDC) property as the site for a female detention facility in lieu of the Pitchess Detention Center (PDC) site previously proposed. In May 2014, the Board directed that "Option 1B" be studied, as recommended in the *Los Angeles County Jail Plan Independent Review and Comprehensive Report* (Jail Plan Report). Option 1B recommended continued evaluation of renovating the facility at MLDC for a women's detention center. The Draft EIR has been prepared to evaluate the environmental impacts of pursuing the proposed Project, in compliance with this Board directive.

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 this Project. Therefore, the proposed Project is consistent with the Board of Supervisor's consideration of policy issues addressing alternative approaches to incarceration, including the commenter's suggestions regarding diversion. Please refer to the response below to Pinkel-19 for additional information relating to the County's actions relating to diversion.

The Draft EIR Section 5.0, Project Alternatives, was prepared in accordance with Sections 15126.6(a) through 15126.6(f) of the State CEQA Guidelines and adequately considers alternatives to the proposed Project. Out-of-custody alternatives were not required to be analyzed in the Draft EIR beyond the No Project alternative analyses and they would not be able to achieve the Project's primary goal, as stated below and in Section 5.3.2 of the Draft EIR.

The Project's goal is to provide detention facilities for low- to medium-security level female inmates that meet modern correctional standards and that prioritize the on-site integration of gender-responsive female inmate education, treatment, and vocational training. This goal focuses on providing a secure detention facility with cost-effective therapeutic and rehabilitative programs to meet needs of eligible female inmates in order to reduce recidivism.

However, environmental impacts associated with "no action" are provided in Alternative 1A, No Project/Continuation of Existing Operations, and Alternative 1B, No Project/Predictable Actions, as demonstrated in Section 5.0, Alternatives. This Final EIR, including all comments submitted to the County on the Draft EIR, will be provided to the County of Los Angeles Board of Supervisors.

Therefore, your concerns will be presented directly to the decision makers prior to consideration of Project approval.

Pinkel-2

A Water Supply Assessment (WSA) was prepared for the Project and is included in Appendix G-2 of the Draft EIR and summarized in Section 4.14, Utilities and Service Systems. The WSA for the Project indicates that the Los Angeles County Waterworks District No. 40 (LACWWD 40) would be able to meet the projected water demands in its service area (Psomas 2015). As required under legislation commonly referred to as Senate Bill (SB) 610, the WSA must include an evaluation of the sufficiency of the water supplies available to the water supplier to meet existing and anticipated future demands (including the demand associated with the project) over a 20-year horizon that includes normal, single-dry, and multiple-dry years. The multiple-dry year scenario would represent drought conditions. With implementation of Mitigation Measure (MM) UTL-1, the LACWWD 40, which will be the Project's water supplier, would have the water supply needed to serve the Project. MM UTL-1 requires that the County sign the New Water Supply Entitlement Acquisition Agreement with the LACWWD 40 and pay a deposit of \$10,000 per acre-foot of annual water demand from the Project for the acquisition of additional water supplies from the Antelope Valley – East Kern Water Agency (AVEK) to serve the Project.

With implementation of MM UTL-1, Project-related estimates for water supply and demand, as provided in the WSA, show that water supply is available to serve the Project during the average year, single-dry year, and multiple-dry years. The WSA concludes that the information on record indicates a sufficient and reliable water supply for LACWWD 40, now and into the future, including a sufficient water supply for the Project (Psomas 2015). These supplies are also sufficient to provide for overall growth in the LACWWD 40 service area at the rate projected in the 2010 Integrated Regional Urban Water Management Plan (IRUWMP).

Regarding the commenter's concern about placement of the Mira Loma Women's Detention Center (MLWDC) in an area subject to drought and subsidence, this comment, in part, raises issues that extend beyond the scope of the California Environmental Quality Act (CEQA) requirements. Nonetheless, the Board of Supervisors will receive and be able to consider it and all other comments raised before taking any action on the proposed Project. The scope of CEQA is generally limited to the evaluation of a proposed Project's potential impact on the environment, and does not extend to the impact of the existing environment on a proposed project or on its users or residents. The applicable definition of the environment analyzed for CEQA purposes in an environmental impact report is the physical conditions in the area that are affected by the proposed project (e.g., land, air, and water). The proposed MLWDC Project's Draft EIR discloses and addresses the potential direct, indirect, and cumulative impacts of the proposed Project on the physical environment, in accordance with the State CEQA Guidelines for all environmental issue areas.

As stated on page 4.5-8, Regulatory Requirement (RR) GEO-1 requires that, prior to the completion of final engineering design plans, the Project's design and construction must be conducted with consideration of the effects of potential subsidence and collapsible soils. This could include remedial grading in specific areas to prepare the site to support the proposed structures; to provide a relative uniform-bearing material below shallow foundations; and/or to allow for overexcavation and recompaction below the planned foundations. Compliance with RR GEO-1 would ensure that the potential for impacts associated with subsidence and collapsible soils would be less than significant.

Pinkel-3

This comment alleges a failure to address the long-term impact of coccidioidomycosis, known as Valley Fever, to on site inmates and women living and working in the Project area. Valley Fever and its potential impact on potential future inmates and County staff is discussed in Section 4.2, Air Quality. A summary of hazards associated with the fungus is provided in the Draft EIR and includes trends related to Valley Fever in Los Angeles County, as inventoried and reported by the Los Angeles County Department of Public Health (LACDPH), which was consulted during the preparation of the Draft EIR.

The commenter references *The Changing Epidemiology of Coccidioidomycosis in Los Angeles (LA) County, California 1973–2011*, co-authored by Ramon Guevara, Tasneem Motala, and Dawn Terashita of the LACDPH. Dr. Terashita has coordinated consulted with the County staff on the issue of Valley Fever during preparation of this EIR. This reference has been reviewed, and it provides an analysis of the incidence rate of Valley Fever in Los Angeles County, including discussion of the Antelope Valley, and displays the trend of increasing cases through 2011. This information is augmented in the Section 4.2, Air Quality, with more recent data, as published in the LACDPH *2013 Annual Morbidity Report*. Information presented in the referenced report is consistent with information provided in the Draft EIR.

The Draft EIR includes an analysis of exposure hazards due to fugitive dust that may result from construction-related earth-moving activities and identifies several Project Design Features (PDFs) and RRs to minimize any exposure risks. PDF AIR-1, which will be included in the Contractor's Specification and monitored through the Mitigation Monitoring and Reporting Program (MMRP), requires the distribution of materials on Valley Fever, or any updated materials as applicable, to worksite supervisors and construction workers. PDF AIR-2 and RR AIR-1, which will be included in the Contractor's Specification and monitored through the MMRP, require compliance with Best Management Practices and Antelope Valley Air Quality Management District (AVAQMD) Rule 403 for the prevention of fugitive dust and nuisance air contaminants. RR AIR-1 provides a listing of the most applicable AVAQMD Rules. Rule 403, Fugitive Dust, requires measures such as watering and control of track-out from the site, as well as submittal of a Dust Control Plan prior to the start of construction. Rule 403 requires control of fugitive dust and avoidance of nuisance, and Rule 402 prohibits the emission of quantities of air contaminants that could cause injury, detriment, nuisance, or annoyance to the public, or that endanger the comfort, repose, health or safety of the public. With implementation of RR AIR-1, on-site earth-moving activities would not result in fugitive dust that could affect adjacent off-site land uses.

As stated in RR AIR-2, the Project will be constructed in compliance with the Department of Health – Infection Control Policy Guidelines Procedure No. 918.01. Policy 918 is intended to prevent the spread of diseases that may be caused by construction-induced airborne pollution in susceptible individuals (patients, staff, and the public) in Department of Health Services (DHS) facilities. The protocols and requirements mandate the designation of an Infection Control Coordinator who must review and approve infection-control plans for new construction or renovation projects to ensure a safe environment. These infection-control plans must include infection-control measures to contain dust, debris, and other elements and to protect the patients, employees, and visitors in this environment. The Infection Control Coordinator has independent authority to stop construction-related activities immediately when the public may be adversely affected by infection-control hazards generated during construction-related activities and when the infection-control precautions and/or engineering controls are inadequate to contain the hazard. As such, the Draft EIR states that exposure to Valley Fever during construction activities would be the same as exposure to dust, and, thus, should follow the requirements for the mitigation of dust. Impacts would be less than significant, and no mitigation is required.

Section 4.2, Air Quality, acknowledges that the future inmate population has the potential to be exposed to dust generated from soils within the Antelope Valley, which have the potential to contain *Coccidioides* spores (i.e., the fungus that causes Valley Fever). As discussed in Section 3.0, Project Description, of the Draft EIR, according to the Sheriff's Department, Assembly Bill (AB) 109 female inmates are serving an average of 423 days in custody from date of sentencing to date of release, while non-AB 109 female inmates serve an average of 107 days in custody. Therefore, the length of time that inmates would be living at the MLWDC is temporary, and is not equivalent to a permanent living circumstance or the longer sentences in state prisons that house higher-security inmates.

The Draft EIR summarizes the LACDPH 2013 *Annual Morbidity Report*, which presents the recent trends related to Valley Fever in Los Angeles County, including and increasing incidence rate for reported coccidioidomycosis cases in the last ten years, which has doubled in the past five years. However, the overall incidence rate in the Antelope Valley was not determined to warrant changes in the County's protocol for disease prevention, notwithstanding the fact that the County health and public health officials are well educated on the condition; are familiar with its incidence in the County and elsewhere in the state; and are involved in research and education on the subject of Valley Fever.

The LACDPH has not identified the previous U.S. Immigration and Customs Enforcement (ICE) detainee population at the Mira Loma Detention Center (MLDC), the future inmate population at the MLWDC, or earlier occupants at the High Desert Health System (HDHS) Multi-Ambulatory Care Center (MACC) (the adjacent hospital facility, which has relocated in Lancaster) as requiring the implementation of health screening protocols or other measures to address potential Valley Fever exposure.

Also, as demonstrated in Section 4.2, Air Quality, the California Department of Corrections and Rehabilitation (CDCR) has not identified the Lancaster area as being a geographic location that requires screening or interventions for the State prison population with regard to exposure to Valley Fever (CDCR 2013). As discussed with the Sheriff's Department staff for the preparation of the Draft EIR, the operation of the MLWDC will follow standard Sheriff's Department procedures for medical care and prevention with regard to health care for inmates in general, and Valley Fever specifically, and the Sheriff's Department will continue to coordinate with the LACDPH (Masis 2015). The LACDPH is the designated County agency with the mandate to protect health, prevent disease, and promote the health and well-being of all persons within Los Angeles County. As such, any future changes in LACDPH policies that may be made regarding Valley Fever for inmate populations will be implemented, as applicable, throughout the County jail system.

Because the future inmate population's exposure to disturbed soils would be limited to gardening activities, PDF AIR-3 in Section 4.2, Air Quality, states that the Project will import gardening soils from outside of the Antelope Valley and would be used in raised planting beds to remove gardening in native soil as a potential source of exposure to Valley Fever spores. Further, outdoor recreational areas would be covered with landscaping, turf grass, gravel, or landscaping/wood chip ground cover that would minimize the opportunity for soils to become airborne.

The Antelope Valley has not been identified by the LACDPH, the AVAQMD, or any other governmental health agency as a region that should be avoided by the elderly, women, children, health-compromised individuals, or by any specific ethnic groups. The Antelope Valley includes the major population centers of the cities of Lancaster and Palmdale, which have an estimated 2014 combined population of approximately 314,902 people. This portion of the Antelope Valley includes a diverse population of residents that includes many individuals that could be considered to be at higher risk of complications due to infection from Valley Fever spores. As stated in

Section 4.2, Air Quality, persons at the highest risk of developing disseminated Valley Fever include the very young (under 1 year old); adults over 60 years; immunocompromised individuals; people with diabetes; women in the third trimester of pregnancy; and certain ethnic groups, including African-Americans and Filipinos.

The demographics of the two cities include approximately 158,605 females (50.4 percent) and 156,297 males (49.6 percent) with a median age of approximately 30.7 years old. The racial/ethnic composition of the area is approximately 47 percent Latino, 29 percent white, 17 percent African American, and 4 percent Asian (U.S. Census Bureau 2016). As such, the temporary presence of a female inmate population into the Antelope Valley would not introduce a new or unusual demographic into the area that is not already present in the existing population of the region.

The MLWDC property is not located in an area determined to be hazardous to the health of local residents or visitors to the region. The Draft EIR concludes that the potential future inmate population's temporary placement into the Antelope Valley, which includes the inmates' participation in all indoor and outdoor activities at the MLWDC, would not constitute placement into a hazardous existing environmental setting that would require mitigation. Additionally, the operation of the proposed Project would not increase the prevalence of Valley Fever spores or otherwise exacerbate an existing environmental condition.

Pinkel-4

The proposed visitation protocol at the MLWDC will be similar to the protocol at the Century Regional Detention Center (CRDF) and opportunities for visitation will be augmented as feasible. Each inmate will be eligible for one 1-hour non-contact visit or two ½-hour non-contact visits (via phone and video) per week during Saturdays and Sundays; during dayshift hours (8:00 AM to 6:00 PM); and on designated holidays. Additional visitation opportunities will be based on volume and space availability. Contact visits will be allowed for inmates who meet established criteria and will be based on visiting volume, scheduled visits, and available time. Attorney visits will be allowed during normal business hours. Visitation systems and protocols at the facility will include visitation areas in two buildings and video visitation rooms and video interview rooms in transitional housing.

The goal at the MLWDC will be to increase visitation opportunities and augment current systems in place at the CRDF with video visiting and contact visitation in areas that are not enclosed, but open, thereby creating a more normative environment.

As such, the Project will provide a combined minimum of 34 video-visiting stations on site, along with video interview rooms in transitional housing buildings. Additionally, as demonstrated on page 3-4, in Section 3.0, Project Description, the Board of Supervisors directed the establishment of an Advisory Board (now called the Gender Responsive Advisory Committee) that will report to the Board of Supervisors on specific programmatic and operational issues. The Advisory Committee has already begun to organize its meetings with a membership including representatives of County staff, outside agencies, advocates, organizations, individuals with incarceration experience, and representatives with expertise in reducing recidivism of female inmates. As part of its charge, the Advisory Committee is tasked with reviewing the program model for the proposed MLWDC Project to ensure that it is evidence-based in reducing recidivism; evaluating strategies to reduce negative impacts of operating the proposed MLWDC away from the downtown Los Angeles area, including contract transportation for visitors, video visiting for attorney consultation; and reviewing national best practices for visiting and family reunification.

Pinkel-5

The County conducted the noticing and scoping for the proposed Project in accordance with Section 15082 of the State CEQA Guidelines. An Initial Study and Notice of Preparation (NOP) of an EIR was made available for public review between September 5, 2014, and October 6, 2014, which included a notice of a Scoping Meeting. The NOP and Scoping Meeting notice was sent to all responsible/trustee agencies and individuals that had requested to be informed about the Project in order to solicit feedback from federal, State, regional, and local government agencies and interested parties on the scope and content of the Draft EIR for the Project. A notice announcing the availability of the Initial Study, the NOP, and the Scoping Meeting was published in the *Antelope Valley Press* on September 5, 2014; in the *Country Journal* on September 6, 2014; and on the *Antelope Valley Times* website from September 5 through September 11, 2014. Hardcopies of the Initial Study and NOP were also made available at the Quartz Hill Library and the Lancaster Library.

The County then held a Scoping Meeting for the EIR from 6:00 PM to 8:00 PM on September 18, 2014, at the American Heroes Park Community Room at 701 West Kettering Avenue in Lancaster, California. A total of 19 individuals (not including County employees) signed the attendance sheet for the Scoping Meeting, which is provided in Appendix A-3 of the Draft EIR.

The County then held two public community meetings during the Draft EIR noticed public review periods. The first was held on Tuesday, December 8, 2015, from 6:00 PM to 8:00 PM at the James C. Gilley Lancaster National Soccer Center Eastside Activity Center, 43000 30th Street East in Lancaster, CA 93535, and the second meeting was held subsequent to the receipt of the commenter's letter on Tuesday, February 9, 2016, at the Lancaster Public Library at 601 West Lancaster Boulevard in Lancaster, CA 93534. As such, this second public meeting addresses the commenter's request for an additional community meeting. Attendance at the public meetings was voluntary and was not required to submit comments on the Draft EIR. The public notifications and public meeting opportunities on the proposed Project are summarized in detail in Section 1.0 of this Final EIR.

Pinkel-6

The County conducted the noticing and scoping for the proposed Project in accordance with Section 15082 of the CEQA Guidelines. An Initial Study and NOP was made available for public review between September 5, 2014 and October 6, 2014, which included a notice of a scoping meeting. The NOP and scoping meeting notice was sent to all responsible/trustee agencies and individuals that had requested to be informed about the Project in order to solicit feedback from federal, State, regional, and local government agencies and interested parties on the scope and content of the Draft EIR for the Project. A notice announcing the availability of the Initial Study and NOP was also published in the *Antelope Valley Press* on September 5, 2014; in the *Country Journal* on September 6, 2014; and on the *Antelope Valley Times* website from September 5 through September 11, 2014. Hardcopies of the Initial Study and NOP were also made available at the Quartz Hill Library and the Lancaster Library.

The County then held a Scoping Meeting for the EIR from 6:00 PM to 8:00 PM on September 18, 2014, at the American Heroes Park Community Room at 701 West Kettering Avenue in Lancaster, California. A total of 19 individuals (not including County employees) signed the attendance sheet for the Scoping Meeting, which is provided in Appendix A-3 of the Draft EIR. The address for the Scoping Meeting was properly listed in all notifications, as confirmed on the City of Lancaster's website (<http://www.cityoflancasterca.org/about-us/departments-services/parks-recreation->

[arts/parks/american-heroes-park](#)) and contained a photograph of the meeting building and the address for the American Heroes Park, at 701 West Kettering Avenue.

The notifications for the Draft EIR and public review period were made in accordance with Section 15087 of the California Environmental Quality Act (CEQA) Guidelines. In November 2015, a Notice of Availability (NOA) of the Draft Environmental Impact Report and Notice of Public Meeting was prepared and distributed to the State Office of Planning and Research, responsible and trustee agencies, organizations, interested parties, and other agencies required to receive the notice to announce the MLWDC Draft EIR public review period between November 9, 2015, and January 12, 2016. The County voluntarily provided an extended comment period for more than the required 45 days, to avoid any inconvenience to commenters from the holidays occurring in the comment period.

A public meeting was held to provide an overview of the Project and the conclusions of the Draft EIR on Tuesday, December 8, 2015, from 6:00 PM to 8:00 PM at the James C. Gilley Lancaster National Soccer Center Eastside Activity Center at 43000 30th Street East in Lancaster, CA 93535. This meeting was voluntary and attendance was not required to submit comments on the Draft EIR. The NOA was distributed to the mailing list and email list prepared for the Notice of Preparation (NOP), and was augmented to include property owners within a 300-foot radius of the Project site, individuals requested to be added to the list, as well as individuals that had provided comments on the NOP. The NOA was posted on the County's website for viewing and downloading at <ftp://dpwftp.co.la.ca.us/pub/PMD/MiraLomaWomenFacility>. Newspaper advertisements of the NOA and Draft EIR comment period and the public meeting were placed in the following papers and ran on Monday, November 9, 2015:

- *Acton-Aqua Dolce News*: a weekly publication so the ad was available for 7 days.
- *Los Angeles Daily News*: a daily publication
- *Antelope Valley Press*: a daily publication
- *Antelope Valley Times*: an online publication

The County voluntarily added additional outreach for the MLWDC Draft EIR public review process. In January 2016, a *Notice of Extended Comment Period for the Draft Environmental Impact Report for the Mira Loma Women's Detention Center Project and Notice of Second Public Meeting in Lancaster, California* was sent to the 2015 NOA mailing list and email list, as well as additional mailing list contacts that had provided comment letters during the Draft EIR public review period up to the time of the mailing. This Notice was prepared in both English and Spanish. Additionally, the Executive Summary of the Draft EIR was prepared in Spanish and posted on the County's website for viewing and downloading. Hardcopies of the Spanish-translated Executive Summary was made available at the Quartz Hill and Lancaster Libraries, and the Los Angeles County Public Information Office. Newspaper advertisements of the extended comment period and second public meeting were placed in the following papers and ran on Monday, February 1, 2016:

- *Acton-Aqua Dolce News*: weekly publication so the ad was available for 7 days
- *Los Angeles Daily News*: a daily publication
- *La Opinion*: a daily publication (the ad ran in both English and Spanish)
- *Antelope Valley Press*: a daily publication
- *Antelope Valley Times*: an online publication

The second public meeting was held on Tuesday, February 9, 2016, at the Lancaster Public Library at 601 West Lancaster Boulevard in Lancaster, CA 93534 to present an overview of the proposed Project and the Draft EIR process and conclusions, and to invite submission of public comments on the Draft EIR. Real-time Spanish translation services were made available, as were

copies of the Notice and the Executive Summary in both English and Spanish. This second public meeting had two attendees from the public. Attendance at the public meetings was voluntary and was not required to submit comments on the Draft EIR.

In summary, the County conducted all required noticing and scoping for the proposed Project in accordance with Section 15082 of the State CEQA Guidelines and conducted the public review for the Draft EIR in compliance with Section 15087 of the State CEQA Guidelines. The two public meetings, as well as the extension of the public review period until March 2, 2016, are beyond the requirements of CEQA.

Pinkel-7

In each section of the Draft EIR, the first instance of the first use of a phrase that will be referred to with an acronym (e.g. Mira Loma Women's Detention Center [MLWDC]), the Draft EIR defines the phrase. This is repeated within each section so that the reader does not need to refer to other sections within the Draft EIR or to an abbreviation list to understand the acronym.

Pinkel-8

The MLWDC will provide an adequate number of visiting booths to comply with state regulations and mandates (providing two 30-minute visits/week or one 1-hour visit/week). Importantly, the proposed MLWDC will accommodate various forms of visitation, including traditional non-contact visiting, telephone access, video visiting, and contact visiting. Contact visits refer to opportunities for inmates and visitors to interact face to face, allowing for physical contact. Non-contact visits refer to visitations where the inmate and the visitor are separated by a glass barrier, and no physical contact is allowed. Video visits refer to long-distance visitation that can occur through a video conferencing program, allowing the inmate and the visitor to hear and see each other via the computer and screen. In order to achieve a more normative environment, it is the goal of the Project to provide video visiting as well as both indoor and outdoor areas where contact visitation opportunities can be provided for inmates and their families. Visitation will be an integral part of the rehabilitative process at the MLWDC. Contact visitation is believed to provide families a positive opportunity to maintain closer ties and assist them into transitioning back into their communities, thus reducing recidivism.

Pinkel-9

The evaluation of alternatives was appropriately included in the Draft EIR as required by CEQA. Once it can consider the Final EIR and recommendations of its staff, the Board of Supervisors has the discretion to approve, revise, or deny the proposed Project, and may also choose to move forward with an alternative to the proposed Project. This comment incorrectly describes this proposed project as having been approved. As demonstrated in Section 5.0, Project Alternatives, an EIR must describe a range of reasonable and of potentially feasible alternatives to the proposed Project or to the location of the Project, which would feasibly attain most of the basic Project Objectives, but would avoid or substantially lessen any significant effects. Based on the analyses in Sections 4.1 through 4.15, the Project would result in significant environmental effects prior to mitigation on a number of environmental topics. Following mitigation, however, impacts to all of these topical areas would be avoided or reduced to less than significant levels with the implementation of mitigation measures. No significant and unavoidable impacts would occur with the Project.

Additionally, an EIR is not required to consider alternatives that are infeasible. The range of alternatives is governed by a "rule of reason" that requires discussion of only those alternatives

necessary for the County of Los Angeles Board of Supervisors (Board) to make a reasoned choice. As demonstrated in Section 3.0, Project Description, on October 22, 2013, the Board authorized the evaluation of a proposal to use a portion of the Mira Loma Detention Center (MLDC) property as the site for a female detention facility in lieu of the Pitchess Detention Center (PDC) site previously proposed. In May 2014, the Board directed that "Option 1B" be studied, as recommended in the *Los Angeles County Jail Plan Independent Review and Comprehensive Report* (Jail Plan Report). Option 1B recommended continued evaluation of renovating the facility at MLDC for a women's detention center.

The alternatives set forth in Section 5.0, Project Alternatives satisfy the requirements of Section 15126.6 of the State CEQA Guidelines because they could feasibly attain most of the basic objectives. The alternatives would also reduce environmental impacts, although as discussed in the Draft EIR, implementation of the proposed Project would not result in any significant impacts after mitigation.

Pinkel-10

The environmental impacts associated with "no action" are provided in Alternative 1A, No Project/Continuation of Existing Operations, and Alternative 1B, No Project/Predictable Actions, as demonstrated in Section 5.0, Alternatives. The continuation of housing the female inmates at the CRDF would not result in new environmental impacts as this is occurring under existing conditions. Occupation by female inmates was the condition at the time of the issuance of the Project's NOP. The NOP was issued in September of 2014, which according to Section 15125 of the State CEQA Guidelines, establishes the existing physical conditions on the Project site from both a local and regional perspective and constitutes the baseline conditions by which a lead agency determines whether an impact is significant. Thus, the implications of Alternatives 1A, 1B, and 3, which do not represent new environmental impacts, need not be considered in the EIR.

While the Project is one of several actions that the County is considering for improvements to the entire jail system, the Project itself has independent utility, in that it can be implemented separately from all other County projects. Thus, it is considered in the Draft EIR as a Project that would be presented to the Board of Supervisors for consideration independent of other County plans and proposals. If the MLWDC Project is not approved and the County decides to build a new Men's Central Jail, then a means of temporarily housing the male inmate population could be evaluated in the CEQA document prepared for that project, as necessary.

Pinkel-11

As stated in Section 15126.6(d) of the State CEQA Guidelines, the EIR shall include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed project. If an alternative would cause one or more significant effects in addition to those that would be caused by the project as proposed, the significant effects of the alternative shall be discussed, but in less detail than the significant effects of the project as proposed. Thus, the analysis of the alternatives to the Project in Section 5.0 of the Draft EIR is not intended to be, nor is it required to be, as extensive as the analysis of the impacts of the Project in Section 4.0 of the Draft EIR.

Pinkel-12

Please refer to the response for Pinkel-10 above.

Pinkel-13

Please refer to the response for Pinkel-1 above.

Pinkel-14

The analyses in Sections 4.1 to 4.15 of the Draft EIR discuss the environmental impacts of the Project and indicate that compliance with existing regulations and implementation of identified mitigation measures will avoid significant environmental impacts or reduce significant impact to less than significant levels. The Draft EIR was prepared based on the proposed site plan, as shown in Exhibit 3-1 of the Draft EIR, as well as information about the construction and operation of the proposed Project from the County Department of Public Works and the County Sheriff's Department. The Draft EIR includes an analysis of a conservative set of assumptions about Project construction and operations.

Pinkel-15

The comment incorrectly concludes that thresholds of significance are not described in the Draft EIR. The thresholds of significance used under each issue area are provided in Section 4.0 of the Draft EIR. Some are derived from Appendix G of the State CEQA Guidelines, which are used in determining whether the impact of the Project would be significant or not. In other instances, quantitative thresholds are also provided, such as in Section 4.2, Air Quality, and Section 4.13, Transportation and Traffic.

Pinkel-16

Currently, the Sheriff's Department is following the mandates of AB 109 in accordance with the direction of the County Board of Supervisors with regard to funding allocations.

Pinkel-17

As demonstrated on page 3-17 of Section 3.0, Project Description, the average number of inmates in the Sheriff's Department population has increased due to a substantial number of inmates categorized as "N3" (i.e. non-violent, non-serious, non-sexual) serving their terms in County jail as mandated under AB 109. These inmates are being incarcerated in accordance with established laws and the process of determining which women are appropriately incarcerated is beyond the scope of this proposed Project. The County jail population is directly influenced by sentences imposed by the court system.

Pinkel-18

Purely social effects of a project are beyond the scope of CEQA analysis, which focuses on the proposal's effect on the physical environment. Currently, the Sheriff's Department is following the mandates of AB 109 in accordance with the direction of the County Board of Supervisors with regard to funding allocations. The County, however, has a concurrent focus on diversion from incarceration as it considers this Project, as described in the response for Pinkel-19 below.

Women currently in the custody of the Los Angeles County Sheriff's Department who are not granted diversion opportunities do not qualify for early release and/or diversion programs due to the severity of the violation.

Pinkel-19

This comment relates to the merits of the proposed Project and not the environmental analysis included in the Draft EIR or the environmental impacts of the Project. 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 this Project. This Final EIR, including all comments submitted to the County on the Draft EIR, will be provided to the County of Los Angeles Board of Supervisors. Therefore, your concerns will be presented directly to the decision makers prior to consideration of Project approval.

The Board of Supervisors has adopted numerous recent actions to reduce the number of people who are incarcerated in Los Angeles County, particularly those with mental illness and/or substance use disorders. The Board of Supervisors' 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 in a document entitled "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".

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 Countywide Criminal Justice Coordination Committee. All Advisory Board members participated in the Countywide 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 of Los Angeles Chief Executive Office (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 Re-Entry (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 of Supervisors determined the Office will be a part of the Department of Health Services and the Director of the Office will report to the Director of the Department of Health Services. The Director of this Office will be 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 Sheriff, Fire Chief, Chief Executive Office, Superior Court, Public Defender, Alternate Public Defender, Probation, District Attorney, Mental Health, Public Health and Health Services.

The Office will oversee Countywide diversion efforts including a system of integrated mental, physical and public health care services and supportive housing for those at risk of homelessness who are re-directed 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 of Supervisors directed that future budget allocations be a part of the annual budget process. On September 1, 2015, the Board of Supervisors also directed that the Office distribute funding so at least 1,000 individuals would be diverted across all intercept points within the criminal justice system.

The Criminal Justice Mental Health Advisory Board report of August 2015 concluded that even with increased opportunities for diversion from a jail environment, there will still be a need for mental health treatment in jails, and that diversion efforts can reduce, but will not eliminate, the need for the County to operate detention facilities. In light of the County's diversion efforts, the Board of Supervisors directed that, for purposes of on-going study and evaluation in the environmental review process, the maximum size of the proposed women's detention center at Mira Loma in Lancaster would remain at 1,604 beds. In addition the Board of Supervisors reduced the maximum proposed size by approximately 1,000 beds, for purposes of the environmental review of a separate proposed treatment and detention center addressing needs of incarcerated men and women with mental illness and/or substance use disorders at the site of the current Men's Central Jail in downtown Los Angeles.

Pinkel-20

As stated on page 3-9 in Section 3.0, Project Description, Building 3 will provide visiting activities, including (1) non-contact personal and family visits; (2) non-contact attorney visits with provisions for passing and reviewing papers; (3) contact visits with attorneys with appropriate work orders and/or department authorization; and (4) supervised contact visits with immediate family members and children. In addition to these accommodations, the MLWDC will have video visitation opportunities in Building 3 and within some of the housing units that may also be used by inmates for off-site attorney consultations.

In order to achieve a more normative environment, it is the goal of the Project to provide video visiting as well as both indoor and outdoor areas where contact visitation opportunities can be provided for inmates and their families. A fenced outdoor courtyard area within the secured perimeter fencing will be constructed to allow for outdoor visitation. Visitation will be an integral part of the rehabilitative process at the MLWDC. Contact visitation is believed to provide families a positive opportunity to maintain closer ties and assist them into transitioning back into their communities, thus reducing recidivism.

Pinkel-21

There will be a fee associated with the video visitation service that will be determined after completion of the facility and based on available technology and related costs at that time. Fees will be similar to those associated with traditional phone calls. The MLWDC will meet minimum State requirements and mandates with the goal of providing augmented services, if feasible. Visitation will be offered according to available space and time frames, which will consist of an hour minimum per week. Each inmate will be eligible for one 1-hour non-contact visit or two ½-hour non-contact visits (via phone and video) per week during Saturdays and Sundays; during dayshift hours (8:00 AM to 6:00 PM); and on designated holidays. Any additional visitation time allowance will be determined based on total inmate population, the volume of visitors, and facility capabilities. A scheduling system is necessary in order to accommodate the entire inmate

population in an orderly manner and to account for minimum requirements. Any interruption to the scheduled visit would only be due to emergency notifications and/or at the conclusion of the scheduled visit.

Pinkel-22

Yes, it is the intention of the Sheriff's Department that the Transition Housing will receive augmented visitation services and other program opportunities to assist female inmates in their transition back into their communities.

Pinkel-23

The comment alleges that the proposed Project's visitation protocol is inhumane. The MLWDC will meet minimum State requirements and mandates with the goal of providing augmented services, if feasible. Visitation will be offered according to available space and time frames, in which each inmate will be eligible for one 1-hour non-contact visit or two ½-hour non-contact visits (via phone and video) per week during Saturdays and Sundays; during dayshift hours (8:00 AM to 6:00 PM); and on designated holidays. Any additional visitation time allowance will be determined based on total inmate population, the volume of visitors, and facility capabilities. A scheduling system is necessary in order to accommodate the entire inmate population in an orderly manner and to account for minimum requirements. Any interruption to the scheduled visit would only be due to emergency notifications and/or at the conclusion of the scheduled visit.

Pinkel-24

Section 3.0, Project Description, of the Draft EIR states that the Project will offer general education classes, computer training, general and vocational career technical education, college courses, career counseling, a learning resource center, a library and computer labs, culinary classes, and indoor/outdoor recreation for inmates. Other services include religious services, counseling services, and community transition services. Participation in classes, training, and other activities will be scheduled for each inmate according to individual evaluation, interests, needs, and availability.

Course selections will be determined based their needs for specific services, and students' interest levels. Courses will be offered during three blocks of time each weekday (morning, afternoon, and evening), providing opportunities for inmates to be enrolled in multiple courses. Programs are also divided into three categories based on program intensity: all-day, half-day, and evening programs. Examples of all-day programs (morning and afternoon) include culinary arts programs, cosmetology programs, and Prisoner Assisted Community Enhancement (PACE). Examples of half-day programs (morning or afternoon) include small engine repair, animal grooming/training, social media management and marketing/office assistant, automotive detailing, windshield and headlight repair, and recycling. Examples of evening programs include computer coding, small business entrepreneurship, community college, Associate of Arts Degree, and General Education. Other programs include prenatal programs, volunteer programs, peer mentoring, physical education, dance, arts and crafts, a commissary program, and book clubs.

The Advisory Committee established at Board direction includes in its tasks a review of the program model for the proposed Project to ensure that its programming is evidence-based in reducing recidivism. See response for Pinkel-4 for a description of the Advisory Committee.

Pinkel-25

“Licensed Medical Personnel” refers to Registered Nurses. On-site “medical practitioners” refers to Licensed Physicians and Registered Nurse Practitioners. On-site medical practitioners will provide obstetrics, gynecological, dental, orthopedic, and dermatology services. Radiology and laboratory services will be available for diagnostic testing. An on-site pharmacy will be available for medication dispensing. Licensed nursing personnel will provide nurse clinics, sick call, and preventative medical care education.

Pinkel-26

Inmates at the MLWDC will have access to computer classes and computer labs will be available at Building 5. Telecommunications space in each building refer to telephone, internet, radio, public announcement, and alarm systems that would be provided at each building to facilitate communications between Project staff in different buildings.

Pinkel-27

The MLWDC is an open campus setting with barrack-style and dormitory housing in lieu of traditional high security structure cell configurations such as those in the current Lynwood facility, which is housing women inmates in jail cells originally designed for high security male inmates. Each housing barrack will have an open day room for group activities as well as outdoor facilities establishing a less institutional environment.

Pinkel-28

The bunks will be standard detention style bunks and inmates will have space to sit and read in open dayroom spaces away from the bunks. The exact configuration of the bunk bed system and associated lighting are internal design considerations that are not within the scope of the Draft EIR, which evaluates the impacts of the proposed Project on the physical environment.

Pinkel-29

Yes, the video visitation system will provide the opportunity for private conversations. Any interruption would only be due to emergency notifications and/or at the conclusion of the scheduled visit. There will be a fee associated with the service that will be determined after completion of the facility and based on available technology and related costs at that time. Fees will be similar to those associated with traditional phone calls.

Pinkel-30

Female inmates are being incarcerated in accordance with established laws, and the process of determining which women are appropriately incarcerated is beyond the scope of this proposed Project. This comment will be presented to the County of Los Angeles Board of Supervisors prior to their consideration of Project approval.

Pinkel-31

Please refer to the response for Pinkel-1 above.

Pinkel-32

The Draft EIR process does not require a description of staff training requirements, which is not an environmental impact. However all Sheriff's Department personnel receive gender specific training with regard to female inmates.

Pinkel-33

Courses are provided by licensed community based organizations and are established according to the need/demand as well as achievable time frames. Career Technical courses such as computer, culinary arts, and family life skills are among the many purpose programs intended for the MLWDC. The EBI program would provide inmates the opportunity to participate in college courses, which are to be provided by College of the Canyons. However, there would be no established program for inmates to specifically earn a Bachelor's degree. The educational programs that will be available at MLWDC will be facilitated by appropriately licensed and accredited institutions and instructors, which are held accountable to the standards set by the governing agency/institution. As discussed in Section 3.0, Project Description, of the Draft EIR, according to the Sheriff's Department, AB 109 female inmates are serving an average of 423 days in custody from sentencing date to release date, while non-AB 109 female inmates serve an average of 107 days in custody. Thus, the average period of incarceration would be inconsistent with earning a four-year degree.

Pinkel-34

Inmate worker jobs will be available to assist in the everyday functioning duties of the facilities. Jobs will include but will not be limited to; working in the kitchen, serving food, and sorting laundry.

Pinkel-35

Visitation will be offered according to available space and time frames in order to meet State requirements and mandates (providing two 30-minute visits /week, or one 1-hour visit /week). The proposed MLWDC will accommodate various forms of visitation, including traditional non-contact visiting, telephone access, video visiting, and contact visiting. In order to achieve a more normative environment, it is the goal of the Project to provide video visiting as well as both indoor and outdoor areas where contact visitation opportunities can be provided for inmates and their families. Visitation will be an integral part of the rehabilitative process at MLWDC. A scheduling system is necessary in order to accommodate the entire inmate population in an orderly manner and to account for minimum requirements. Any additional visitation allowances will be determined by the availability of space and time.

Pinkel-36

There will be a fee associated with video visits that will be determined after completion of the facility and based on available technology at that time and related costs. The MLWDC will meet minimum state regulations and mandates with the goal of providing augmented visitation services. It is the intention of the Sheriff's Department to provide video visitations to all inmates at MLWDC.

Pinkel-37

As discussed in Section 3.0, Project Description, the Sheriff's Department is in the process of expanding the number of locations throughout the County to afford visitors/families access to video visiting equipment. Currently, seven Sheriff's Department stations are equipped with an

Inmate Video Visitation System (IVVS) that is accessible to the public. They are Lakewood, San Dimas, Norwalk, Carson, Lancaster, Palmdale, and East Los Angeles. Each of these seven Sheriff's Department stations currently has one public facing video visiting station installed. These seven video stations are available for visitor/family access and are able to communicate with inmates housed at all the current jail facilities throughout Los Angeles County.

As funding becomes available, the Sheriff's Department intends to complete the expansion of IVVS into the remaining Sheriff's Department stations throughout Los Angeles County and increase the number of video units inside the inmate housing units at a rate of 40 to 50 new video visiting stations per year. Additional video units will also be installed in the public visiting areas of the jail facilities. As of January 1, 2016, the installation of 72 video visiting stations at the Carson, East Los Angeles, Lancaster, Lakewood, Norwalk, Palmdale and San Dimas Stations has been completed. Video visiting stations are also in operation at Century Regional Detention Facility, Men's Central Jail, Pitches Detention Center (North County Correctional Facility and South Facility), Twin Towers Correctional Facility and Los Angeles County Medical Center. Currently, the Sheriff's Department is working with software vendors to define the scope of the pilot project that will allow visitors to video conference from home or office during this calendar year.

Pinkel-38

The MLWDC will provide an adequate number of visiting booths and video visiting stations to accommodate the intended inmate population of 1,604 individuals, in accordance with state regulations and mandates. With the introduction of a contact visitation center to augment the Sheriff's Department visitation services at the MLWDC, the Project will provide sufficient options for inmates to visit with their families. Providing adequate visitation for inmates and their families is a goal of the proposed Project.

Pinkel-39

The MLWDC will provide an attorney room to accommodate private inmate visits with attorneys. Attorneys will also have extended hours to visit with their clients. Section 3.0, Project Description, of the Draft EIR provides information on the operational characteristics of the Project. Attorney visits will be allowed during normal business hours. Visitation systems and protocols at the facility will include visitation areas in two buildings and video visitation rooms and video interview rooms in transitional housing. As stated on page 3-9, Building 3 will provide visiting activities, including (1) non-contact personal and family visits; (2) non-contact attorney visits with provisions for passing and reviewing papers; (3) contact visits with attorneys with appropriate work orders and/or department authorization; and (4) supervised contact visits with immediate family members and children. In addition to these accommodations, the MLWDC will have video visitation opportunities in Building 3 and within some of the housing units that may also be used by inmates for off-site attorney consultations.

Pinkel-40

Water to serve the Project would be provided by imported water purchased by the LACWWD 40 from the State Water Project through AVEK. The Project's projected water usage is addressed in Section 4.14, Utilities and Service Systems. The Project's estimated water demand is less than the 250 acre-feet per year (afy) threshold established by the California Department of Water Resources (DWR) for requiring a Water Supply Assessment (WSA) for the proposed Project under legislation commonly referred to as Senate Bill (SB) 610, as described further in Section 4.14 of the Draft EIR. Nonetheless, to provide informed decision-making, a WSA was prepared for the Project and provided in Appendix G-2 of the Draft EIR. The WSA is also

summarized in Section 4.14. As required under SB 610, the WSA must include an evaluation of the sufficiency of the water supplies available to the water supplier to meet existing and anticipated future demands (including the demand associated with the project) over a 20-year horizon that includes normal, single-dry, and multiple-dry years. The multiple-dry year scenario would represent drought conditions. With implementation of MM UTL-1, the Los Angeles County Waterworks District No. 40 (LACWWD 40), which will be the Project's water supplier, would have the water supply needed to serve the Project. MM UTL-1 requires that the County sign the New Water Supply Entitlement Acquisition Agreement with LACWWD 40 and pay a deposit of \$10,000 per acre-foot of annual water demand from the Project for the acquisition of additional water supplies from Antelope Valley – East Kern Water Agency (AVEK) to serve the Project.

With implementation of MM UTL-1, Project-related estimates for water supply and demand, as provided in the WSA, show that water supply is available to serve the Project during the average year, single-dry year, and multiple-dry years. The WSA concludes the information on record indicates a sufficient and reliable water supply for LACWWD 40, now and into the future, including a sufficient water supply for the Project (Psomas 2015). These supplies are also sufficient to provide for existing demands and demands from overall growth in the LACWWD 40 service area at the rate projected in the 2010 Integrated Regional Urban Water Management Plan (IRUWMP) (LACWWD 40 2011).

Pinkel-41

Information from the Western Regional Climate Center indicates that the average wind speeds in the Lancaster area (as measured from the General William J. Fox Airfield) was 11.2 mph from 1996-2006. The average wind speeds from 1996-2008 changed to 10.9 mph. The average number days when peak gusts were over 30 mph was 182.3 days per year during this 12-year period, with 28.5 days when peak gusts were equal to or over 40 mph and 2.5 days when peak gusts were equal to or over 50 mph. The potential for the transport of soil particles and Valley Fever spores is not only dependent on wind speeds, but also on ground surface cover (e.g., impervious surface, vegetation, soil binders, etc.), the compaction of the soil, moisture content, and the amount of disturbance. Thus, it cannot be readily said if a specific wind speed would result in the transport of soil particles and Valley Fever spores.

Section 4.2, Air Quality, acknowledges that the future inmate population has the potential to be exposed to dust generated from soils within the Antelope Valley, which have the potential to contain *Coccidioides* spores (i.e., the fungus that causes coccidioidomycosis, commonly known as Valley Fever). Additionally, Section 4.2, Air Quality, acknowledges that the Project site is located adjacent to land on the east that has exposed native soils (i.e., a two-megawatt [MW] solar array) and is situated in the context of many acres of undeveloped land and fallow farmland that could generate airborne dust during windstorms. However, the Draft EIR concludes that the potential future inmate population's temporary placement into the Antelope Valley, which includes the inmates' participation in all indoor and outdoor activities at the MLWDC, would not constitute placement into a hazardous existing environmental setting.

Please refer to the response for Pinkel-3 above for the discussion of Valley Fever.

Pinkel-42

Please refer to the response for Pinkel-3 above.

Pinkel-43

As discussed in the response for Pinkel-3 above, the Draft EIR acknowledges that certain populations are more at risk of being infected with Valley Fever; however, neither African American, Philippino, nor other female inmates would be housed at separate facilities due to potential Valley Fever exposure. The Antelope Valley has not been identified by the LACDPH, the AVAQMD, or any other governmental health agency as a region that should be avoided by the elderly, women, children, health-compromised individuals, or by any specific ethnic groups. The Antelope Valley includes the major population centers of the cities of Lancaster and Palmdale, which have an estimated 2014 combined population of approximately 314,902 people. This portion of the Antelope Valley includes a diverse population of residents that includes many individuals that could be considered to be at higher risk of complications due to infection from Valley Fever spores.

The operation of the MLWDC will follow standard Sheriff's Department procedures for medical care and prevention with regard to health care for inmates in general, and Valley Fever specifically, and the Sheriff's Department will continue to coordinate with the LACDPH (Masis 2015). The LACDPH is the designated County agency with the mandate to protect health, prevent disease, and promote the health and well-being of all persons in Los Angeles County. As such, any future changes in LACDPH policies that may be made regarding Valley Fever for inmate populations will be implemented, as applicable, throughout the County jail system.

Pinkel-44

As discussed in the response for Pinkel-3 above, the MLWDC property is not located in an area determined to be hazardous to the health of local residents or visitors to the region. The Draft EIR concludes that the potential future inmate population's temporary placement into the Antelope Valley, which includes inmates' participation in all indoor and outdoor activities at the MLWDC, would not constitute placement into a hazardous existing environmental setting that would require mitigation. As discussed in Section 4.2, Air Quality, the operation of the MLWDC will follow standard Sheriff's Department procedures for medical care and prevention with regard to health care for inmates in general, and Valley Fever specifically, and the Sheriff's Department will continue to coordinate with the LACDPH (Masis 2015). The LACDPH is the designated County agency with the mandate to protect health, prevent disease, and promote the health and well-being of all persons within Los Angeles County. As such, any future changes in LACDPH policies that may be made regarding Valley Fever for inmate populations will be implemented, as applicable, throughout the County jail system.

Pinkel-45

As discussed under the response for Pinkel-3, and as discussed in Section 4.6, Greenhouse Gas Emissions, regulations, plans, and policies adopted for the purpose of reducing GHG emissions and maximizing energy efficiency that are directly applicable to the Project include: (1) Title 24, Part 6 Energy Efficiency Standards for Residential and Nonresidential Buildings, of the *California Code of Regulations* (CCR); (2) Title 24, Part 11 California Green Building Standards Code (CALGreen Code) of the CCR; (3) Title 22 of the County Code, Parts 20 (Green Building) and 21 (Drought-tolerant Landscaping); and (4) Title 31 of the County Code (Los Angeles County Green Building Standards Code). The Project would be consistent with the requirements of these energy-related regulations, as per RRs GHG-1, GHG-2, and GHG-3.

The MLWDC property is not located in an area determined to be hazardous to the health of local residents or visitors to the region. The Draft EIR concludes that the potential future inmate

population's temporary placement into the Antelope Valley facility, which includes the inmates' participation in all indoor and outdoor activities at the MLWDC, would not constitute placement into a hazardous existing environmental setting that would require the described additional measures.

Pinkel-46

This comment, in part, raises issues that extend beyond the scope of the CEQA requirements; nonetheless, the Board of Supervisors will receive and be able to consider it and all other comments raised before taking any action on the proposed Project. The scope of CEQA is generally limited to the evaluation of a proposed project's potential impact on the environment, and does not extend to the impact of the existing environment on a proposed project, or on its users or residents. The applicable definition of the environment analyzed for CEQA purposes in an environmental impact report is the physical conditions in the area that are affected by the proposed project (e.g. land, air, and water). The proposed MLWDC Project's Draft EIR discloses and addresses the potential direct, indirect, and cumulative impacts of the proposed Project on the physical environment, in accordance with the State CEQA Guidelines for all environmental issue areas.

The WSA for the Project indicates that the LACWWD 40 would be able to meet the projected water demands in its service area, along with the Project's demands, through the next 20 years, including normal, single-dry, and multiple dry (5-year period) years. Future demand is projected to increase within the LACWWD 40 service areas and the reliability of the LACWWD 40's future water supplies to meet demand will be ensured through continued implementation of programs for water banking; purchase of new imported supplies; water transfers; water conservation; and expansion of recycled water systems.

Pinkel-47

The groundwater level declines and associated land subsidence are not as severe near the Project site as in other parts of the Antelope Valley Groundwater Basin. Local survey monument benchmark records would be reviewed to determine the amount of land subsidence on or near the Project site, as part of RR GEO-1. The design of the building foundations has not been determined, as the design phase is yet to occur. However, the foundation design for new buildings or additions will be designed and constructed to appropriately address current soil conditions and characteristics identified by a California licensed geologist, soils engineer and structural engineer. The design will meet code requirements, which include recognition of soil bearing pressure, seismic activity and jurisdictional building codes as well as AB 900 structural requirements. Existing facilities are monitored periodically for distress as part of facility operation and maintenance protocol, and there would be no hazards posed to the inmate or employee population.

The MLWDC Project proposes the adaptive reuse, renovation, and expansion of the majority of the buildings at MLDC. As stated on page 4.5-8, RR GEO-1 requires that prior to the completion of final engineering design plans, the Project's design and construction must be conducted with consideration of the effects of potential subsidence and collapsible soils. This could include remedial grading in specific areas to prepare the site to support the proposed structures; to provide a relative uniform-bearing material below shallow foundations; and/or to allow for over-excavation and re-compaction below planned foundations. Compliance with RR GEO-1 would ensure that the potential for impacts associated with existing geologic conditions would be less than significant.

Pinkel-48

The Project requires a new water line to connect the Project's on-site water infrastructure to the existing 12-inch LACWWD 40 water line in West Avenue I. The Project does not require the construction of new trunk lines or other major infrastructure improvements, as the LACWWD 40 facilities are adequate to serve the proposed Project. Costs associated with the provision of water at the MLWDC will be an ongoing operational cost. Economic costs are beyond the scope of the CEQA analysis, which focuses on the proposed Project's effect on the physical environment. Additional information regarding the Project's capital costs is provided below in the response for Pinkel-58.

Pinkel-49

The use of potable water from persons moving into the Antelope Valley area due to employment or relations with inmates at the Project would be met by LACWWD 40 as part of its projected increase in demands through the years analyzed through its Urban Water Management Plan. The Integrated Regional Urban Water Management Plan (IRUWMP) for the Antelope Valley indicates that the LACWWD 40 would be able to meet the projected water demands in its service area through the next 20 years, including normal, single-dry, and multiple dry (5-year period) years. Future demand is projected to increase within the LACWWD 40 service areas and the reliability of the LACWWD 40's future water supplies to meet demand will be ensured through continued implementation of programs for water banking; purchase of new imported supplies; water transfers; water conservation; and expansion of recycled water systems. The temporary increase in water use during the weekends due to the estimated 250 visitors per weekend or holiday is not expected to represent a significant amount of water when compared to the LACWWD 40's 2014 total supply of 50,447 acre-feet per year (afy), as some of these visitors would not be permanently living in the area.

Pinkel-50

The Sheriff's Department has protocols established for visitation to determine if an inmate is "ineligible" for visitation for various reasons, including the inmate's failure to comply with jail rules, her medical or mental/restricted status, the facility's security condition, or the inmate's engagement in inappropriate behavior during a visit.

Pinkel-51

The comment alleges that the proposed Project's visitation protocol is inhumane. The MLWDC will meet minimum State requirements and mandates with the goal of providing augmented services. Visitation will be offered according to available space and time frames, in which each inmate will be eligible for one 1-hour non-contact visit or two ½-hour non-contact visits (via phone and video) per week during Saturdays and Sundays, during dayshift hours (8:00 AM to 6:00 PM) and on designated holidays. Any additional visitation time allowance will be determined based on total inmate population, the volume of visitors and facility capabilities. A scheduling system is necessary in order to accommodate the entire inmate population in an orderly manner and to account for minimum requirements. Any interruption to the scheduled visit would only be due to emergency notifications and/or at the conclusion of the scheduled visit.

Pinkel-52

As stated in PDF GHG-3 in Section 4.6, Greenhouse Gas Emissions, the Project will post Antelope Valley Transit Authority (AVTA) bus and Metrolink schedules, as well as the locations

of the nearest Park-and-Ride lots, in areas visible to visitors and in the Staff Services building to encourage the use of public transportation by staff and visitors. AVTA bus and Metrolink schedule information will be updated a minimum of every six months to ensure that they are accurate. The County does not operate the buses and trains that serve the Antelope Valley area. The Southern California Regional Rail Authority (SCRRA), which operates the Metrolink commuter rail system, and the AVTA, which operates buses, provide transit services to meet demand and generally review service routes and schedules as part of their long-range planning efforts. Should demand increase over existing levels, it will be up to the Metrolink and AVTA agencies to revise or expand their services to meet demand.

As demonstrated on page 3-4, in Section 3.0, Project Description, the Board of Supervisors directed the establishment of an Advisory Board (now called the Gender Responsive Advisory Committee) that will report to the Board of Supervisors on specific programmatic and operational issues. The Advisory Committee has already begun to organize its meetings with a membership including representatives of County staff, outside agencies, advocates, organizations, individuals with incarceration experience, and representatives with expertise in reducing recidivism of female inmates. As part of its charge, the Advisory Committee is tasked with reviewing the program model for the proposed MLWDC Project to ensure that it is evidence-based in reducing recidivism; evaluating strategies to reduce negative impacts of operating the proposed MLWDC away from the downtown Los Angeles area, including contract transportation for visitors, video visiting for attorney consultation; and reviewing national best practices for visiting and family reunification.

Pinkel-53

As described in the Project Traffic Impact Study, it is anticipated that the relocation of inmates to the MLWDC would result in additional vehicle miles traveled (VMT) by visitors, inmate buses, and by service/delivery trucks when compared to the length of trips required for the CRDF located in the City of Lynwood (LLG 2015). The discussion of video visitation on page 4.13-20 is provided in the context of estimating the total VMT as associated with the located of the MLWDC away from the highly urbanized area of Los Angeles County, but is not considered in the trip generation estimates in the Traffic Impact Study.

Page 4.11-7 of the Draft EIR states that there are 1,920 visitation slots available. However, the number of trips for inmate visitation was estimated at 39 percent of the available appointment slots or about 28,543 visits per year (the same rate as existing at the CRDF). Forecasts assume 250 inbound visitor trips and 250 outbound visitor trips per day during the 114 weekend days and holidays per year. This visitation reflects the number of visitors that currently occurs at a detention facility that is located in the highly urbanized area of Los Angeles County. With this estimate, it is expected that video visitation would occur in addition to the in-person visits that involve personal vehicle trips to the MLWDC. Again, all 1,920 visitation slots would be available to inmates of the Project.

Pinkel-54

Please see the response for Pinkel-4 above.

Pinkel-55

Please see the response for Pinkel-49 above.

Pinkel-56

While the Project's estimated water demand is less than the 250 acre-feet per year (afy) threshold established by the California Department of Water Resources (DWR) for requiring a WSA under legislation commonly referred to as Senate Bill (SB) 610, a WSA was prepared for the Project and provided in Appendix G-2 of the Draft EIR. The WSA is also summarized in Section 4.14, Utilities and Service Systems. As required under SB 610, the WSA must include an evaluation of the sufficiency of the water supplies available to the water supplier to meet existing and anticipated future demands (including the demand associated with the project) over a 20-year horizon that includes normal, single-dry, and multiple-dry years. The multiple-dry year scenario would represent drought conditions.

The WSA for the Project, as summarized in Section 4.14, Utilities and Service Systems, discusses the adjudication of groundwater rights in the Antelope Valley and that this adjudication will provide a final allocation of groundwater rights for the long-term groundwater management of the Antelope Valley Groundwater Basin. A finite volume of groundwater that the LACWWD 40 can pump without paying penalties or replenishment fees would be assigned as part of the adjudication, and the adjudication judgment provides LACWWD 40 with the rights to pump approximately 22,500 afy to 27,000 afy of groundwater depending on factors including the amount of the Federal reserved right which is not used by the United States and the supplemental yield attributable to return flows from imported water purchased by LACWWD 40 and delivered to its customers. The Integrated Regional Urban Water Management Plan (IRUWMP) for the Antelope Valley projects that groundwater allocation for LACWWD 40 would be based on historical pumping amounts. The LACWWD 40 is projected to have an average annual pumping rate of 23,200 acre-feet per year (afy) from 2015 to 2035 (LACWWD 40 2011). These projections are subject to change after the adjudication has been finalized as the judgment is currently being appealed; however, it is estimated the 23,200 afy allocation is a conservative value and the final adjudicated amount could be higher, as indicated above.

As contained in the WSA, no change in the available groundwater supplies for the LACWWD 40 is projected from 2015 to 2035 (Psomas 2015). Thus, if the final adjudication judgment results in LACWWD 40 having the right to pump a greater amount, it will have the option to pump up to its allocation or pump below its allocation. This will allow the LACWWD 40 to readily provide water supply to the Project and its other customers, as well as reduce its use of imported water sources. If the final adjudication judgment results in LACWWD 40 receiving the right to pump a lower volume of groundwater, LACWWD 40 would have the option to use a greater amount of imported water or to more heavily rely on its programs for water banking; purchase of new imported supplies; water transfers; water conservation; and expansion of recycled water systems.

The WSA for the Project indicates that the LACWWD 40 would be able to meet the projected water demands in its service area, along with the Project's demands, through the next 20 years, including normal, single-dry, and multiple dry (5-year period) years (Psomas 2015). As indicated on page 4.14-29 of the Draft EIR, the LACWWD 40 will serve the Project with imported water purchased through the Antelope Valley East Kern Agency (AVEK). MM UTL-1 requires that the County sign the New Water Supply Entitlement Acquisition Agreement with the LACWWD 40 and pay a deposit of \$10,000 per acre-foot of annual water demand from the Project for the acquisition of additional water supplies from AVEK to serve the Project.

The WSA concludes that there is a sufficient and reliable water supply for LACWWD 40, now and into the future, including a sufficient water supply for the Project during normal, single-dry, and multiple dry (5-year period) years (Psomas 2015). The LACWWD 40's water supplies are also

sufficient to provide for overall growth in the LACWWD 40 service area at the rate projected in the 2010 IRUWMP during normal, single-dry, and multiple dry years.

Pinkel-57

Construction on the Project site would occur for approximately 35 months, and as shown on Table 3-4, Estimated Construction Schedule in Section 3.0, Project Description, approximately 15 months would involve the vast majority of earth-moving activities (e.g. Demolition, Site Preparation, and Grading phases). Approximately 35,000 cubic yards (cy) of cut and fill will be balanced on-site through grading activities, as stated on page 3-21 of Section 3.0, Project Description. Assuming approximately 30 gallons per cubic yard of material moved (MCAQD 2005), this would result in a total of approximately 1.05 million gallons of construction water over the course of the 15 months of earthmoving activities. This temporary requirement for water for construction activities would equate to approximately 1.08 percent of the potable water supplied through the existing County-owned wells in 2012 (i.e. 97,294,604 gallons in 2012), which was the last year of the operations of ICE at the MLDC property. Given the historic pumping at the County-owned wells, the temporary requirement of approximately one percent of historic groundwater pumping at the County-owned wells would not result in an impact to groundwater supplies or recharge rates.

Pinkel-58

The estimated costs for the building of the proposed MLWDC from design to occupancy are presented in Item S-1 of the June 9, 2015 presentation to the Board of Supervisors on jail planning. In this presentation, the proposed MLWDC Project is shown to cost approximately \$123.4 million, and the costs are broken down into AB 900 Grant Contribution, net County cost, and other funding sources. These preliminary costs include the costs associated with the mitigation measures included in the Final EIR. An updated total Project cost estimate will be prepared for the Board of Supervisors for their consideration at the time the Final EIR and the proposed Project recommendations are presented to them for consideration. The 2015 document can be viewed at the following website: <http://file.lacounty.gov/bos/supdocs/94070.pdf>

Regarding operational costs associated with the proposed Project, the final design of the facility has not been drafted or approved, and the long-term operational costs have not yet been determined.

Pinkel-59

This comment is the completion of a reference made in Pinkel-2. Please refer to the response for Pinkel-2 above.



MIRA LOMA WOMEN'S DETENTION CENTER PROJECT
PUBLIC MEETING- DECEMBER 8, 2015
6:00 TO 8:00 PM

COMMENTS:

We need more schools, better transportation, and real mental ~~best~~ health.

R.
Quintero-1

NAME: *Ramon Quintero*

ADDRESS: *8336 Summerfield Ave, Whittier, CA 90606*

E-MAIL: *ramondone@gmail.com*

Ramon Quintero

R. Quintero-1

This comment does not specifically address the proposed Project, nor the environmental analysis included in the Draft Environmental Impact Report (EIR) or the environmental impacts of the Project, but indicates a need for schools, better transportation, and mental health care.

This Final EIR, including all comments submitted to the County on the Draft EIR, will be provided to the County of Los Angeles Board of Supervisors. Therefore, your concerns will be presented directly to the decision makers prior to consideration of Project approval.



MIRA LOMA WOMEN'S DETENTION CENTER PROJECT
PUBLIC MEETING- DECEMBER 8, 2015
6:00 TO 8:00 PM

COMMENTS: There is no need for a women's Detention Center, we need to focus more on mental health issues and youth centers. Removing mothers from their children will end up in a never ending cycle of kids who don't know what to do with their life.

S.Quintero-
1

NAME: Sergio Quintero
ADDRESS: 3626 E. 5th St. Los Angeles, CA
E-MAIL: squintero@youthbuildcharter.org

Sergio Quintero

S. Quintero-1

Although the Project site has been unoccupied since 2012, as discussed in Section 2.0, Environmental Setting, the Project site has generally been in operation and providing various detention/jail functions since 1945–1946. The MLWDC Project proposes the adaptive reuse, renovation, and expansion of the majority of the buildings at Mira Loma Detention Center (MLDC), which is an existing County asset. The redevelopment of the property would avoid the costs associated with constructing a new facility.

Inmates in the Los Angeles County jail system are incarcerated in accordance with established laws, and the process of determining which women are appropriately incarcerated is beyond the scope of this proposed Project. The County jail population is directly influenced by sentences imposed by the judicial court system. Magistrates have the legal discretion to impose the maximum or minimum sentencing.

The Board of Supervisors has adopted numerous recent actions to reduce the number of people who are incarcerated in Los Angeles County, particularly those with mental illness and/or substance use disorders. The Board of Supervisors' 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 in a document entitled "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".

The Criminal Justice Mental Health Advisory Board report of August 2015 concluded that even with increased opportunities for diversion from a jail environment, there will still be a need for mental health treatment in jails, and that diversion efforts can reduce, but will not eliminate, the need for the County to operate detention facilities. In light of the County's diversion efforts, the Board of Supervisors directed that, for purposes of on-going study and evaluation in the environmental review process, the maximum size of the proposed women's detention center at Mira Loma in Lancaster would remain at 1,604 beds. In addition the Board of Supervisors reduced the maximum proposed size by approximately 1,000 beds, for purposes of the environmental review of a separate proposed treatment and detention center addressing needs of incarcerated men and women with mental illness and/or substance use disorders at the site of the current Men's Central Jail in downtown Los Angeles. In summary, the Board of Supervisors has taken steps to reduce the number of people who are incarcerated in Los Angeles County.

This comment relates to the merits of the proposed Project and not the environmental analysis included in the Draft Environmental Impact Report (EIR) or the environmental impacts of the Project. This Final EIR, including all comments submitted to the County on the Draft EIR, will be provided to the County of Los Angeles Board of Supervisors. Therefore, your concerns will be presented directly to the decision makers prior to consideration of Project approval. Please see response for Form Letter-1 for additional detail regarding County actions relating to diversion and other out-of-custody alternatives.



MIRA LOMA WOMEN'S DETENTION CENTER PROJECT
PUBLIC MEETING- DECEMBER 8, 2015
6:00 TO 8:00 PM

COMMENTS:

• No Spanish Information Avail.

• No Spanish speaker's meeting

Rand-
Washington-
1

• Environmental Hazard

Rand-
Washington-
2

• Disadvantage for families, Siblings, Children
and Supportive Service

Rand-
Washington-
3

• No Video Visiting

Therefore I do not await the EIR at Womens Jail

Rand-
Washington-
4

Rand-
Washington-
5

NAME: Vickie Nicole Rand-Washington Mother of four

ADDRESS: 1200 W. 37th Place, LA, CA 90007

E-MAIL: Vickiewashington1@gmail.com

Vickie Nicole Rand-Washington

Rand-Washington-1

The County voluntarily added additional outreach in Spanish for the Mira Loma Women's Detention Center (MLWDC) Draft Environmental Impact Report (EIR) public review process as a result of public comments. In January 2016, a *Notice of Extended Comment Period for the Draft Environmental Impact Report for the Mira Loma Women's Detention Center Project and Notice of Second Public Meeting in Lancaster, California* was sent to the Project's mailing list and email list, as well as additional mailing list contacts that had provided comment letters during the Draft EIR public review period up to the time of the second mailing. This Notice was prepared in both English and Spanish. Additionally, the Executive Summary of the Draft EIR was translated into Spanish and posted on the County's website for viewing and downloading. Hardcopies of the Spanish-translated Executive Summary were made available at the Quartz Hill and Lancaster Libraries, as well as the Los Angeles County Public Information Office. Newspaper advertisements of the extended comment period and second public meeting were placed in the following papers and ran on Monday, February 1, 2016:

- *Acton-Aqua Dolce News*: a weekly publication so the ad was available for 7 days
- *Los Angeles Daily News*: a daily publication
- *La Opinion*: a daily publication (the ad was in both English and Spanish)
- *Antelope Valley Press*: a daily publication
- *Antelope Valley Times*: an online publication

A second public meeting was held on Tuesday, February 9, 2016 at the Lancaster Public Library at 601 West Lancaster Boulevard in Lancaster, CA 93534 to present an overview of the proposed Project and the Draft EIR process and conclusions, and to invite submission of public comments on the Draft EIR. Real-time Spanish translation services were made available, as were copies of the Notice and the Executive Summary in both English and Spanish. Two members of the public attended that meeting and neither requested Spanish translation services.

Rand-Washington-2

This comment raises the issue of environmental hazards, but does not articulate a detailed concern related to the Draft EIR. The Draft EIR for the proposed Project has been prepared in accordance with the California Environmental Quality Act (CEQA, *California Public Resources Code*, Sections 21000 et seq.) and the State CEQA Guidelines (14 *California Code of Regulations* [CCR]), and addresses the potential direct, indirect, and cumulative impacts of the Project on all environmental issue areas. Section 5.0, Project Alternatives, was prepared in accordance with Sections 15126.6(a) through 15126.6(f) of the State CEQA Guidelines. As demonstrated throughout the Draft EIR, all potentially significant impacts have been reduced to levels that are less than significant through the identified mitigation measures, and no significant unavoidable environmental impacts would result from Project implementation.

For specific impacts related to hazards and hazardous materials, a Phase I Environmental Site Assessment (ESA) has been prepared that reviewed past and current uses and site conditions and identified Recognized Environmental Concerns (RECs) on the Project site and surrounding area. The Phase I ESA is provided in Appendix E-1 of the Draft EIR. Subsequent to the Phase I ESA, a Phase II ESA was prepared that included soil sampling to determine if soil contamination is present on the site. The Phase II ESA is provided in Appendix E-3 of the Draft EIR. In addition, an Asbestos and Lead Based Paint Survey Report was completed to identify the building components that contained asbestos and lead-based paint. The Asbestos and Lead Based Paint

Survey Report is provided in Appendix E-2 of the Draft EIR. These reports are summarized in Section 4.7, Hazards and Hazardous Materials of the Draft EIR.

The Project must comply with existing regulatory requirements (RRs) for the proper handling of hazardous wastes, including transportation, treatment, storage, and disposal; repair and/or removal of underground storage tanks based on applicable standards; and practices that would protect the demolition and construction crews from asbestos and lead exposure. In addition, the Project must incorporate mitigation measures (MMs) for the handling of suspected asbestos-containing materials and lead-based paint; an Operations and Maintenance Plan for regular inspection of any asbestos-containing materials; and testing and repair of underground storage tanks prior to use. Thus, existing hazardous materials and wastes would be removed from the Project site and future hazardous materials use would comply with applicable regulations to prevent hazards to future inmates. In summary, compliance with RRs and implementation of MMs set forth in the Draft EIR would prevent public health and safety hazards to inmates, employees, visitors and other individuals at the Project site.

Rand-Washington-3

This comment relates to disadvantages for families, siblings, children and supportive service, but does not articulate a detailed concern related to the Draft EIR. As it relates to visitation, the County is aware of the potential challenges this increased distance may pose for some visiting family members, while for other visiting family members from the Lancaster and other County areas, the Project location will be closer to their homes than the current women's jail in Lynwood. As demonstrated on page 3-4, in Section 3.0, Project Description, the Board directed the establishment of an Advisory Board (now called the Gender Responsive Advisory Committee) that will report back to the Board of Supervisors. The Advisory Committee consists of County staff, outside experts, and others including previously incarcerated participants to review the program model for the MLWDC Project to ensure that it is evidence based in reducing recidivism. As part of its charge, the Advisory Committee is tasked with further evaluating strategies to reduce negative impacts of operating the MLWDC away from the downtown Los Angeles area, including contract transportation for visitors, video visiting for attorney consultation, and reviewing national best practices for visiting and family reunification.

Rand-Washington-4

This comment relates to video visitation, but does not articulate a detailed concern related to the Draft EIR. As discussed in Section 3.0, Project Description, an Inmate Video Visitation System will be provided that will include a cable television signal distribution system to the proposed 34 video visiting stations in the central inmate area, barracks, and video interview rooms in transitional housing buildings. Television sets or computer screens will be provided in each video visiting station. Table 3-5 on page 3-24 of Section 3.0, Project Description, states that video visits would be allowed by appointment only, with no maximum weekly time limit and with daytime and evening appointments available. Importantly, the proposed MLWDC will accommodate various forms of visitation, including traditional non-contact visiting, telephone access, video visiting, and contact visiting. Contact visits refer to opportunities for inmates and visitors to interact face to face, allowing for physical contact. Non-contact visits refer to visitations where the inmate and the visitor are separated by a glass barrier, and no physical contact is allowed. Video visits refer to long-distance visitation that can occur through a video conferencing program, allowing the inmate and the visitor to hear and see each other via the computer and screen. Therefore, video visiting is a component of a visiting program.

Rand-Washington-5

This comment relates to the merits of the proposed Project, and not the environmental analysis included in the Draft EIR or the environmental impacts of the Project. This Final EIR, including all comments submitted to the County on the Draft EIR, will be provided to the County of Los Angeles Board of Supervisors. Therefore, your concerns will be presented directly to the decision makers prior to consideration of Project approval.

-----Original Message-----

From: Anayeli Rivas [mailto:rivas.anayeli@yahoo.com]

Sent: Tuesday, January 12, 2016 9:10 PM

To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental <environmental@ceo.lacounty.gov>; lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov; FifthDistrict@lacbos.org

Subject: Attn: Mira Loma Women’s Jail Environmental Impact Report

Dear LA County Chief Exec Office and Board of Supervisors,

Dear LA County Board of Supervisors and Chief Executive Office, Please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

I’m writing to alert you that the agency tasked with monitoring the toxicity of the Mira Loma proposal, including construction and ensuing use, has been exposed as notoriously racist, sexist, and transphobic. Senior level scientists at the Department of Toxic Substances Control (DTSC) have been exposed for sending extremely offensive and prejudicial emails leading Critical Resistance and other community organizations to be concerned over such a biased agency’s ability to successfully monitor the toxicity levels and health concerns in any areas with concentrations of marginalized communities. Though the agency staff involved in the matter has received reprimand, there has not been sufficient investigation into the impacts of their racist and prejudicial actions and if this has resulted in harms to communities residing in or near the areas they monitor.

Rivas-1

Part of the proposed site for the Mira Loma jail, the War Eagle Field, (see DEIR 4.7-18) has high levels of total petroleum hydrocarbons and arsenic, which the DTSC has ruled “less than significant”. We do not trust a known racist, sexist, and transphobic agency to determine the health standards for an imprisoned population of primarily women and transgenderpeople of color. Additionally, Lancaster is 38% Latino/a and 21% African American – how are we to trust a racist agency with monitoring the land toxicity impacting the health of these Lancaster residents?

Rivas-2
Rivas-3

According to the LA Times, the DTSC was similarly responsible for monitoring “the now-shuttered Exide Technologies plant [which was] was able to operate for years in Vernon without a permit despite pollution problems affecting nearby, predominantly Latino neighborhoods. Toxic lead dust has been found at homes and yards near the battery recycling plant.”

Rivas-4

By partnering with the DTSC, LA County puts itself not only in the position of endangering its residents and prisoners, but also at risk for a potential lawsuit due to long term health impacts of toxicity. The DTSC must undergo a full investigation in order for confidence to be instilled in LA County residents that this agency takes seriously its responsibility to care for the residents of Lancaster, the proposed prisoners at Mira Loma Jail, and the construction workers who would be tasked with building the facility. This proposed jail is unsafe for LA County communities and our environment. DTSC cannot be trusted to unprejudicially monitor the health impacts related to toxicity. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

Rivas-5
Rivas-6

Sincerely,
Anayeli Rivas
on behalf of
Critical Resistance Los Angeles

--

Anayeli Rivas
rivas.anayeli@yahoo.com
1706 w 108th st
LA, California 90047
CRLA

Anayeli Rivas (January 12, 2016)

Rivas-1

This comment relates to the merits of the proposed Project, including concerns regarding personnel employed by the California Department of Toxic Substances Control (DTSC), and not the environmental analysis included in the Draft Environmental Impact Report (EIR) or the environmental impacts of the Project. This Final EIR, including all comments submitted to the County on the Draft EIR, will be provided to the County of Los Angeles Board of Supervisors. Therefore, your concerns will be presented directly to the decision makers prior to consideration of Project approval.

Rivas-2

As stated on page 4.7-18 of the Draft EIR, the DTSC lists the Polaris Flight Academy with a status of "inactive-needs evaluation" as of July 2005 (Converse 2014c). However, the potential media affected and the potential contaminants of concern were not identified. Funding for the evaluation, investigation, or remediation of old airfields is through Defense Environmental Restoration Account (DERA), with the DTSC as the lead agency. As part of the Phase II Environmental Site Assessment (ESA) conducted for this Project in March 2015, soil borings collected in the area of the possible former location of the airstrip did not detect any contaminants that would require further action. On the same page of the Draft EIR, it is noted that the DTSC sets the background level for arsenic at 12 milligrams per kilogram (mg/kg), which is the level that is equivalent to naturally occurring background concentrations in soils in Los Angeles County. The comment on the DTSC does not relate to the Project, the environmental analysis included in the Draft EIR, or the environmental impacts of the Project. This Final EIR, including all comments submitted to the County on the Draft EIR, will be provided to the County of Los Angeles Board of Supervisors. Therefore, your concerns will be presented directly to the decision makers prior to consideration of Project approval.

Rivas-3

Please refer to the response for Rivas-1 above.

Rivas-4

The comments on the DTSC and the Exide plant do not relate to the proposed Project, the environmental analysis included in the Draft EIR, or the environmental impacts of the Project. This Final EIR, including all comments submitted to the County on the Draft EIR, will be provided to the County of Los Angeles Board of Supervisors. Therefore, your concerns will be presented directly to the decision makers prior to consideration of Project approval.

Rivas-5

The proposed Project is not a partnership between the County and DTSC; however, the DTSC is expected to perform its regulatory functions and responsibilities as it relates to hazardous materials that are under their purview. The County of Los Angeles does not have the authority to perform an investigation of the activities of DTSC, which is a State agency.

Rivas-6

Regarding the commenter's concern that the site is unsafe due to toxicity, the Project site is listed in government databases due to past hazardous material uses. However, the Project site was never operated as a site that accepted hazardous wastes for disposal. The Project site is on the list of Leaking Underground Storage Tanks (LUST) Sites, but the leaking underground storage tanks have been removed and the affected area cleaned up. The County Department of Public Works oversaw the remediation and issued the "no further action" letter. The DTSC lists the Polaris Flight Academy with a status of "inactive-needs evaluation". As part of the environmental assessments prepared for the Project, soil borings collected in the area of the possible former location of the airstrip were evaluated and the results did not detect any contaminants that would require further action (Converse 2015). Thus, the listing of the site in government databases was based on past uses that no longer pose hazards.

As part of the environmental analysis for the Draft EIR, a Phase I ESA reviewed past and current uses and site conditions and identified Recognized Environmental Concerns (RECs) on the Project site and surrounding area. The Phase I ESA is provided in Appendix E-1 of the Draft EIR. Subsequent to the Phase I ESA, a Phase II ESA was prepared that included soil sampling to determine if soil contamination is present on the site. The Phase II ESA is provided in Appendix E-3 of the Draft EIR. In addition, an Asbestos and Lead Based Paint Survey Report was completed to identify the building components that contained asbestos and lead-based paint. The Asbestos and Lead Based Paint Survey Report is provided in Appendix E-2 of the Draft EIR. These reports are discussed in Section 4.7, Hazards and Hazardous Materials, of the Draft EIR. In summary, the Phase II ESA concludes that there is no soil or groundwater contamination on the Project site requiring remediation or other mitigation measures.

The Project must comply with existing regulatory requirements (RRs) for the proper handling of hazardous wastes, including transportation, treatment, storage, and disposal; repair and/or removal of underground storage tanks based on applicable standards; and practices that would protect the demolition and construction crews from asbestos and lead exposure. In addition, the Project must incorporate mitigation measures (MMs) for the handling of suspected asbestos-containing materials and lead-based paint; an Operations and Maintenance Plan for regular inspection of any asbestos-containing materials; and testing and repair of underground storage tanks prior to use. Thus, existing hazardous materials and wastes would be removed from the Project site and future hazardous materials use would comply with applicable regulations to prevent hazards to future inmates. In summary, compliance with RRs and implementation of MMs set forth in the Draft EIR would prevent public health and safety hazards to inmates, employees, visitors and other individuals at the Project site.



MIRA LOMA WOMEN'S DETENTION CENTER PROJECT
PUBLIC MEETING- DECEMBER 8, 2015
6:00 TO 8:00 PM

COMMENTS:

I dont this project should be passed
there is harmful thing these woman can
catch well being incarcerated. where they
plan on locating this new jail the
finances should be spent on counseling
healthy care for these woman.

A.
Rodriguez-
1

A.
Rodriguez-
2

NAME: Adrianna Rodriguez

ADDRESS:

E-MAIL: adrianna2218@gmail.com

Adrianna Rodriguez

A. Rodriguez-1

Regarding the commenter's concern that the proposed Project is harmful, as part of the environmental analysis for the Draft Environmental Impact Report (EIR), a Phase I Environmental Site Assessment (ESA) has been prepared that reviewed past and current uses and site conditions and identified Recognized Environmental Concerns (RECs) on the Project site and surrounding area. The Phase I ESA is provided in Appendix E-1 of the Draft EIR. Subsequent to the Phase I ESA, a Phase II ESA was prepared that included soil sampling to determine if soil contamination is present on the site. The Phase II ESA is provided in Appendix E-3 of the Draft EIR. In addition, an Asbestos and Lead Based Paint Survey Report was completed to identify the building components that contained asbestos and lead-based paint. The Asbestos and Lead Based Paint Survey Report is provided in Appendix E-2 of the Draft EIR. These reports are summarized in Section 4.7, Hazards and Hazardous Materials of the Draft EIR.

The Project must comply with existing regulatory requirements (RRs) for the proper handling of hazardous wastes, including transportation, treatment, storage, and disposal; repair and/or removal of underground storage tanks (USTs) based on applicable standards; and practices that would protect the demolition and construction crews from asbestos and lead exposure. In addition, the Project must incorporate mitigation measures (MMs) for the handling of suspected asbestos-containing materials and lead-based paint; an Operations and Maintenance Plan for regular inspection of any asbestos-containing materials; and testing and repair of USTs prior to use. Thus, existing hazardous materials and wastes would be removed from the Project site and future hazardous materials use would comply with applicable regulations to prevent hazards to future inmates. In summary, compliance with RRs and implementation of MMs set forth in the Draft EIR would prevent public health and safety hazards to inmates, employees, visitors and other individuals at the Project site.

The commenter's concern about what inmates can catch while being incarcerated appears to relate to the issue of Valley Fever. *Coccidioidomycosis*, also known as Valley Fever, and its potential impact on potential future inmates and County staff is discussed in Section 4.2, Air Quality. A summary of hazards associated with the *Coccidioides* spores (i.e., the fungus that causes Valley Fever) is provided, as well as summaries of trends related to Valley Fever in Los Angeles County, as inventoried and reported by the Los Angeles County Department of Public Health (LACDPH), which was consulted during the preparation of the Draft EIR.

The MLWDC property is not located in an area determined to be hazardous to the health of local residents or visitors to the region. The Draft EIR concludes that the potential future inmate population's temporary placement into the Antelope Valley, which includes the inmate's participation in all indoor and outdoor activities at the MLWDC, would not constitute placement into a hazardous existing environmental setting that would require mitigation. Additionally, the operation of the proposed Project would not increase the prevalence of Valley Fever spores or otherwise exacerbate an existing environmental condition.

In addition, please see the more detailed response on this issue in the response to Form Letter-5 relating to Valley Fever, which is included in Section 2.3.1 of this Final EIR.

A. Rodriguez-2

Regarding the commenter's concern about the building of a new jail and the associated costs, although the Project site has been unoccupied since 2012 as discussed in Section 2.0,

Environmental Setting, the Project site has generally been in operation and providing various detention/jail functions since 1945-1946. The MLWDC Project proposes the adaptive reuse, renovation, and expansion of the majority of the buildings at MLDC, which is an existing County asset. The redevelopment of the property would avoid the costs associated with constructing a new facility.

Regarding the commenter's assertion that County resources should be spent on counseling for female inmates, the Project will offer general education classes, computer training, general and vocational career technical education, college courses, career counseling, a learning resource center, a library and computer labs, culinary classes, and indoor/outdoor recreation for inmates. Other services include religious services, counseling services, and community transition services. Participation in classes, training, and other activities will be scheduled for each inmate according to individual evaluation, interests, needs, and availability.

Course selections will be determined based on a student's needs for specific services, and students' interest levels. Courses will be offered during three blocks of time each weekday (morning, afternoon, and evening), providing opportunities for inmates to be enrolled in multiple courses. Programs are also divided into three categories based on program intensity: all-day, half-day, and evening programs. Examples of all-day programs (morning and afternoon) include culinary arts programs, cosmetology programs, and Prisoner Assisted Community Enhancement (PACE). Examples of half-day programs (morning or afternoon) include: small engine repair; animal grooming/training; social media management and marketing/office assistant; automotive detailing, windshield and headlight repair; and recycling. Examples of evening programs include: computer coding; small business entrepreneurship; community college; Associate of Arts Degree; and General Education. Other programs include prenatal programs, volunteer programs; peer mentoring; physical education; dance; arts and crafts; a commissary program; and book clubs.

In addition, the Board of Supervisors has adopted numerous recent actions to reduce the number of people who are incarcerated in Los Angeles County, particularly those with mental illness and/or substance use disorders. The Board of Supervisors' 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 in a document entitled "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".

The Criminal Justice Mental Health Advisory Board report of August 2015 concluded that even with increased opportunities for diversion from a jail environment, there will still be a need for mental health treatment in jails, and that diversion efforts can reduce, but will not eliminate, the need for the County to operate detention facilities. In light of the County's diversion efforts, the Board of Supervisors directed that, for purposes of on-going study and evaluation in the environmental review process, the maximum size of the proposed women's detention center at Mira Loma in Lancaster would remain at 1,604 beds. In addition the Board of Supervisors reduced the maximum proposed size by approximately 1,000 beds, for purposes of the environmental review of a separate proposed treatment and detention center addressing needs of incarcerated men and women with mental illness and/or substance use disorders at the site of the current Men's Central Jail in downtown Los Angeles. In summary, the Board of Supervisors has taken steps to reduce the number of people who are incarcerated in Los Angeles County. Please see response for Form Letter-1 for additional detail regarding County actions relating to diversion and other out-of-custody alternatives.



MIRA LOMA WOMEN'S DETENTION CENTER PROJECT
PUBLIC MEETING- DECEMBER 8, 2015
6:00 TO 8:00 PM

COMMENTS:

I am a student in Compton, CA. I am requesting that you not use money to build more jails. We students need programs, educational sites, clinics, housing and aid so that we can continue to be successful. I speak for those who don't have a voice and need our community to support them. Our board of Supervisors need to look after the least of our brothers/sisters. The money will be wasted on making developer richer while our communities of color continue to be victimized by the system. I am a member of Dignity & Power Now as well as Compton for Youth Coalition. We want justice and dignity for our communities of color

E.
Rodriguez-
1

E.
Rodriguez-
2

NAME: Erik Rodriguez
ADDRESS: 9402 Pelet St, Downey, Ca 90241
E-MAIL: erikcid13@gmail.com

Erik Rodriguez

E. Rodriguez-1

Although the Project site has been unoccupied since 2012, as discussed in Section 2.0, Environmental Setting, the Project site has generally been in operation and providing various detention/jail functions since 1945–1946. The MLWDC Project proposes the adaptive reuse, renovation, and expansion of the majority of the buildings at the Mira Loma Detention Center (MLDC), which is an existing County asset. The redevelopment of the property would avoid the costs associated with constructing a new facility.

Section 3.0, Project Description, of the Draft Environmental Impact Report (EIR) states that female inmates at the Century Regional Detention Facility (CRDF) in Lynwood currently receive various programmatic and rehabilitative services, including but not limited to parenting programs; life-skills training; anger management classes; alcohol and drug abuse counseling; and vocational training. These programs will continue at the MLWDC and will be expanded to include Educational Based Incarceration (EBI) programs.

The Project will offer general education classes, computer training, general and vocational career technical education, college courses, career counseling, a learning resource center, a library and computer labs, culinary classes, and indoor/outdoor recreation for inmates. Other services include religious services, counseling services, and community transition services. Participation in classes, training, and other activities will be scheduled for each inmate according to individual evaluation, interests, needs, and availability.

Course selections will be determined based on a student's needs for specific services, and students' interest levels. Courses will be offered during three blocks of time each weekday (morning, afternoon, and evening), providing opportunities for inmates to be enrolled in multiple courses. Programs are also divided into three categories based on program intensity: all-day, half-day, and evening programs. Examples of all-day programs (morning and afternoon) include culinary arts programs, cosmetology programs, and Prisoner Assisted Community Enhancement (PACE). Examples of half-day programs (morning or afternoon) include: small engine repair; animal grooming/training; social media management and marketing/office assistant; automotive detailing, windshield and headlight repair; and recycling. Examples of evening programs include: computer coding; small business entrepreneurship; community college; Associate of Arts Degree; and General Education. Other programs include prenatal programs, volunteer programs; peer mentoring; physical education; dance; arts and crafts; a commissary program; and book clubs.

This comment relates to the merits of the proposed Project, and not the environmental analysis included in the Draft EIR or the environmental impacts of the Project. This Final EIR, including all comments submitted to the County on the Draft EIR, will be provided to the County of Los Angeles Board of Supervisors. Therefore, your concerns will be presented directly to the decision makers prior to consideration of Project approval.

E. Rodriguez-2

This comment alleges that the developer of the jail will get richer. The County of Los Angeles owns the proposed Project site and the Sheriff's Department, which would operate the proposed MLWDC, would not make a profit on the facility. This comment relates to the merits of the proposed Project, and not the environmental analysis included in the Draft EIR or the environmental impacts of the Project. This Final EIR, including all comments submitted to the County on the Draft EIR, will be provided to the County of Los Angeles Board of Supervisors.

Therefore, your concerns will be presented directly to the decision makers prior to consideration of Project approval.



MIRA LOMA WOMEN'S DETENTION CENTER PROJECT
PUBLIC MEETING- DECEMBER 8, 2015
6:00 TO 8:00 PM

COMMENTS:

We have many, many concerns about this new jail project. One is that a new jail in Lancaster will create more traffic & pollution. We also know that jails are hazardous and this location has been identified as a "hazardous material site" and building would put all inside in danger. And also, how does this jail work to liberate & empower marginal people & groups?

K.
Rodriguez-
1

K.
Rodriguez-
2

K.
Rodriguez-
3

NAME: K. Rodriguez

ADDRESS:

E-MAIL: KRodriguez2018@ucla.edu

K. Rodriguez

K. Rodriguez-1

This comment indicates that there are many concerns on the proposed project. Regarding the commenter's concerns over pollutants, Section 4.2, Air Quality, presents the results of the emission analysis using California Emissions Estimator Model (CalEEMod) Version 2013.2.2, which is a computer program that is used to calculate anticipated emissions associated with land development projects in California. As shown in Table 4.2-7 of Section 4.2, Air Quality, the estimated annual operational emissions due to Project-related operations would not exceed the Antelope Valley Air Quality Management District's (AVAQMD's) California Environmental Quality Act (CEQA) significance thresholds, and potential impacts would be less than significant.

Regarding the commenter's concerns over increased traffic, Section 4.13, Transportation and Traffic, estimates the trip generation of the Project, which includes all trip types (i.e., staff and employees, service, and inmate visitation trips) and discusses potential impacts related to Project-generated traffic. The analysis indicates that an increase in traffic volumes would not significantly impact local intersections (intersections would still operate at Level-of-Service D or better), or alternative transportation (Metrolink trains or Antelope Valley Transit Authority [AVTA] bus service), and impacts on California Department of Transportation (Caltrans) facilities would be less than significant. As discussed on page 4.13-23 and 4.13-24, the existing transit services in the area will adequately accommodate the increase of Project-generated transit trips. No mitigation is required for short-term construction or long-term operation traffic impacts.

K. Rodriguez-2

Regarding the comment on the hazardous materials site, the Project site is listed in government databases due to past hazardous material uses. However, the Project site was never operated as a site that accepted hazardous wastes for disposal. The Project site is on the list of Leaking Underground Storage Tanks (LUST) Sites, but the leaking underground storage tanks have been removed and the affected area cleaned up. The County Department of Public Works oversaw the remediation and issued the "no further action" letter. The California Department of Toxic Substances Control (DTSC) lists the Polaris Flight Academy with a status of "inactive-needs evaluation". As part of the environmental site assessments for the Project, soil borings collected in the area of the possible former location of the airstrip did not detect any contaminants that would require further action (Converse 2015). Thus, the listing of the site in government databases was based on past uses that no longer pose hazards.

As part of the environmental analysis for the Draft Environmental Impact Report (EIR), a Phase I Environmental Site Assessment (ESA) has been prepared that reviewed past and current uses and site conditions and identified Recognized Environmental Concerns (RECs) on the Project site and surrounding area. The Phase I ESA is provided in Appendix E-1 of the Draft EIR. Subsequent to the Phase I ESA, a Phase II ESA was prepared that included soil sampling to determine if soil contamination is present on the site. The Phase II ESA is provided in Appendix E-3 of the Draft EIR. In addition, an Asbestos and Lead Based Paint Survey Report was completed to identify the building components that contained asbestos and lead-based paint. The Asbestos and Lead Based Paint Survey Report is provided in Appendix E-2 of the Draft EIR. These reports are summarized in Section 4.7, Hazards and Hazardous Materials of the Draft EIR.

The Project must comply with existing regulatory requirements (RRs) for the proper handling of hazardous wastes, including transportation, treatment, storage, and disposal; repair and/or removal of underground storage tanks based on applicable standards; and practices that would

protect the demolition and construction crews from asbestos and lead exposure. In addition, the Project must incorporate mitigation measures (MMs) for the handling of suspected asbestos-containing materials and lead-based paint; an Operations and Maintenance Plan for regular inspection of any asbestos-containing materials; and testing and repair of underground storage tanks prior to use. Thus, existing hazardous materials and wastes would be removed from the Project site and future hazardous materials use would comply with applicable regulations to prevent hazards to future inmates. In summary, compliance with RRs and implementation of MMs set forth in the Draft EIR would prevent public health and safety hazards to inmates, employees, visitors and other individuals at the Project site.

K. Rodriguez-3

This comment relates to the merits of the proposed Project, and not the environmental analysis included in the Draft EIR or the environmental impacts of the Project. The inmates eligible for this facility will receive various programmatic and rehabilitative services, including but not limited to parenting programs; life-skills training; anger management classes; alcohol and drug abuse counseling; and vocational training. These programs are intended to reduce recidivism.

This Final EIR, including all comments submitted to the County on the Draft EIR, will be provided to the County of Los Angeles Board of Supervisors. Therefore, your concerns will be presented directly to the decision makers prior to consideration of Project approval.



MIRA LOMA WOMEN'S DETENTION CENTER PROJECT
PUBLIC MEETING- DECEMBER 8, 2015
6:00 TO 8:00 PM

COMMENTS:

As a community member I oppose to this new jail since this will effect the children of the mother whom are incarcerated in many different ways for them to visit them. Instead of thinking on building new jails you should be thinking of opening new programs for educating incarcerated people so they never put a foot inside Jail again.

R.
Rodriguez-
1

R.
Rodriguez-
2

NAME: Ravi Rodriguez
ADDRESS: 9102 Pellet St Downey CA 90241
E-MAIL: ravroglez@gmail.com

Raul Rodriguez

R. Rodriguez-1

The Draft Environmental Impact Report (EIR) acknowledges that increased driving distances would be required for some families with the Project due to the location of the site in relation to the Century Regional Detention Facility (CRDF) in Lynwood, which is closer to higher density urban areas near the City of Los Angeles. The County is aware of the potential challenges this increased distance may pose for some visiting family members, while for other visiting family members from the Lancaster and other County areas, the Project location will be closer to their homes than the current women's jail in Lynwood. As demonstrated on page 3-4, in Section 3.0, Project Description, the Board of Supervisors directed the establishment of an Advisory Board (now called the Gender Responsive Advisory Committee) that will report to the Board of Supervisors on specific programmatic and operational issues. The Advisory Committee has already begun to organize its meetings with a membership including representatives of County staff, outside agencies, advocates, organizations, individuals with incarceration experience, and representatives with expertise in reducing recidivism of female inmates. As part of its charge, the Advisory Committee is tasked with reviewing the program model for the proposed MLWDC Project to ensure that it is evidence-based in reducing recidivism; evaluating strategies to reduce negative impacts of operating the proposed MLWDC away from the downtown Los Angeles area, including contract transportation for visitors, video visiting for attorney consultation; and reviewing national best practices for visiting and family reunification.

R. Rodriguez-2

Although the Project site has been unoccupied since 2012 as discussed in Section 2.0, Environmental Setting, the Project site has generally been in operation and providing various detention/jail functions since 1945-1946. The MLWDC Project proposes the adaptive reuse, renovation, and expansion of the majority of the buildings at the Mira Loma Detention Center (MLDC), which is an existing County asset. The redevelopment of the property would avoid the costs associated with constructing a new facility.

Section 3.0, Project Description, of the Draft EIR states that female inmates at the CRDF in Lynwood currently receive various programmatic and rehabilitative services, including but not limited to parenting programs; life-skills training; anger management classes; alcohol and drug abuse counseling; and vocational training. These programs will continue at the MLWDC and will be expanded to include Educational Based Incarceration (EBI) programs.

The Project will offer general education classes, computer training, general and vocational career technical education, college courses, career counseling, a learning resource center, a library and computer labs, culinary classes, and indoor/outdoor recreation for inmates. Other services include religious services, counseling services, and community transition services. Participation in classes, training, and other activities will be scheduled for each inmate according to individual evaluation, interests, needs, and availability.

Course selections will be determined based on a student's needs for specific services, and students' interest levels. Courses will be offered during three blocks of time each weekday (morning, afternoon, and evening), providing opportunities for inmates to be enrolled in multiple courses. Programs are also divided into three categories based on program intensity: all-day, half-day, and evening programs. Examples of all-day programs (morning and afternoon) include culinary arts programs, cosmetology programs, and Prisoner Assisted Community Enhancement (PACE). Examples of half-day programs (morning or afternoon) include: small engine repair;

animal grooming/training; social media management and marketing/office assistant; automotive detailing, windshield and headlight repair; and recycling. Examples of evening programs include: computer coding; small business entrepreneurship; community college; Associate of Arts Degree; and General Education. Other programs include prenatal programs, volunteer programs; peer mentoring; physical education; dance; arts and crafts; a commissary program; and book clubs.

This comment relates to the merits of the proposed Project, and not the environmental analysis included in the Draft EIR or the environmental impacts of the Project. This Final EIR, including all comments submitted to the County on the Draft EIR, will be provided to the County of Los Angeles Board of Supervisors. Therefore, your concerns will be presented directly to the decision makers prior to consideration of Project approval.



MIRA LOMA WOMEN'S DETENTION CENTER PROJECT
PUBLIC MEETING- DECEMBER 8, 2015
6:00 TO 8:00 PM

COMMENTS:

We do not need more prisons!

Things we DO need:

- Housing
- Arts in schools
- Healthy Food
- Health Care / preventative care

S.
Rodriguez-
1

NAME:

Silvia.rodriguez.vega@ucla.edu

ADDRESS:

E-MAIL:

Silvia Rodriguez

S. Rodriguez-1

This comment expresses the view that no more prisons are needed; instead, housing, arts in schools, healthy food, and health care are needed. This comment relates to the merits of the proposed Project, and not the environmental analysis included in the Draft EIR or the environmental impacts of the Project. Purely social effects of a project are beyond the scope of CEQA analysis, which focuses on the proposal's effect on the physical environment.

This Final EIR, including all comments submitted to the County on the Draft EIR, will be provided to the County of Los Angeles Board of Supervisors. Therefore, your concerns will be presented directly to the decision makers prior to consideration of Project approval.



MIRA LOMA WOMEN'S DETENTION CENTER PROJECT
PUBLIC MEETING- DECEMBER 8, 2015
6:00 TO 8:00 PM

COMMENTS:

Please don't build anymore prison
to warehouse and destroy people! Stop
endeavoring to lead the public into thinking
you want to help when in actuality you
only want to hurt and confine
a portion of society

Salaam-1

NAME: Jamil Salaam
ADDRESS: 2007 W. 3rd #209 L.A. CA. 90057
E-MAIL:

Jamil Salaam

Salaam-1

This comment, objecting to the construction of more prisons, relates to the merits of the proposed Project and not the environmental analysis included in the Draft EIR or the environmental impacts of the Project. Purely social effects of a project are beyond the scope of CEQA analysis, which focuses on the proposal's effect on the physical environment. This Final EIR, including all comments submitted to the County on the Draft EIR, will be provided to the County of Los Angeles Board of Supervisors. Therefore, your concerns will be presented directly to the decision makers prior to consideration of Project approval.



MIRA LOMA WOMEN'S DETENTION CENTER PROJECT
PUBLIC MEETING- DECEMBER 8, 2015
6:00 TO 8:00 PM

COMMENTS:

I oppose this project, we don't need another jail. We need more prevention programs to keep ~~the~~ poor women off of prison. Or we need more funding for programs that already exist. The prisoners are gonna be subject to Valley fever and will put them in significant danger.
ABOLISH PRISONS!

} Segura-1
} Segura-2
} Segura-3

NAME: Erica Segura
ADDRESS: 3626 E 5th ST Los Angeles CA
E-MAIL: sureerika@gmail.com

Erica Segura

Segura-1

Regarding the commenter's concern about the building of a new jail and the associated costs, although the Project site has been unoccupied since 2012, as discussed in Section 2.0, Environmental Setting, the Project site has generally been in operation and providing various detention/jail functions from 1945–1946 until 2012. The MLWDC Project proposes the adaptive reuse, renovation, and expansion of the majority of the buildings at the Mira Loma Detention Center (MLDC), which is an existing County asset. The redevelopment of the property would avoid the costs associated with constructing a new facility.

The Project will offer general education classes, computer training, general and vocational career technical education, college courses, career counseling, a learning resource center, a library and computer labs, culinary classes, and indoor/outdoor recreation for inmates. Other services include religious services, counseling services, and community transition services. Participation in classes, training, and other activities will be scheduled for each inmate according to individual evaluation, interests, needs, and availability.

Course selections will be determined based on a student's needs for specific services, and students' interest levels. Courses will be offered during three blocks of time each weekday (morning, afternoon, and evening), providing opportunities for inmates to be enrolled in multiple courses. Programs are also divided into three categories based on program intensity: all-day, half-day, and evening programs. Examples of all-day programs (morning and afternoon) include culinary arts programs, cosmetology programs, and Prisoner Assisted Community Enhancement (PACE). Examples of half-day programs (morning or afternoon) include: small engine repair; animal grooming/training; social media management and marketing/office assistant; automotive detailing, windshield and headlight repair; and recycling. Examples of evening programs include: computer coding; small business entrepreneurship; community college; Associate of Arts Degree; and General Education. Other programs include prenatal programs, volunteer programs; peer mentoring; physical education; dance; arts and crafts; a commissary program; and book clubs.

In addition, the Board of Supervisors has adopted numerous recent actions to reduce the number of people who are incarcerated in Los Angeles County, particularly those with mental illness and/or substance use disorders. The Board of Supervisors' 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 in a document entitled "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".

The Criminal Justice Mental Health Advisory Board report of August 2015 concluded that even with increased opportunities for diversion from a jail environment, there will still be a need for mental health treatment in jails, and that diversion efforts can reduce, but will not eliminate, the need for the County to operate detention facilities. In light of the County's diversion efforts, the Board of Supervisors directed that, for purposes of on-going study and evaluation in the environmental review process, the maximum size of the proposed women's detention center at Mira Loma in Lancaster would remain at 1,604 beds. In addition the Board of Supervisors reduced the maximum proposed size by approximately 1,000 beds, for purposes of the environmental review of a separate proposed treatment and detention center addressing needs of incarcerated men and women with mental illness and/or substance use disorders at the site of the current

Men's Central Jail in downtown Los Angeles. In summary, the Board of Supervisors has taken steps to reduce the number of people who are incarcerated in Los Angeles County.

In addition, please see the more detailed response on this issue in the response to Form Letter-1 regarding County actions relating to diversion and other out-of-custody alternatives, which is included in Section 2.3.1 of this Final EIR.

Segura-2

Coccidioidomycosis, also known as Valley Fever, and its potential impact on potential future inmates and County staff is discussed in Section 4.2, Air Quality. A summary of hazards associated with the *Coccidioides* spores (i.e., the fungus that causes Valley Fever) is provided, as well as summaries of trends related to Valley Fever in Los Angeles County, as inventoried and reported by the Los Angeles County Department of Public Health (LACDPH), which was consulted during the preparation of the Draft Environmental Impact Report (EIR).

The MLWDC property is not located in an area determined to be hazardous to the health of local residents or visitors to the region. The Draft EIR concludes that the potential future inmate population's temporary placement into the Antelope Valley, which includes the inmate's participation in all indoor and outdoor activities at the MLWDC, would not constitute placement into a hazardous existing environmental setting that would require mitigation. Additionally, the operation of the proposed Project would not increase the prevalence of Valley Fever spores or otherwise exacerbate an existing environmental condition.

In addition, please see the more detailed response on this issue in the response to Form Letter-5 relating to Valley Fever, which is included in Section 2.3.1 of this Final EIR.

Segura-3

This comment relates to the merits of the proposed Project and not the environmental analysis included in the Draft Environmental Impact Report (EIR) or the environmental impacts of the Project. This Final EIR, including all comments submitted to the County on the Draft EIR, will be provided to the County of Los Angeles Board of Supervisors. Therefore, your concerns will be presented directly to the decision makers prior to consideration of Project approval.



MIRA LOMA WOMEN'S DETENTION CENTER PROJECT
PUBLIC MEETING- DECEMBER 8, 2015
6:00 TO 8:00 PM

COMMENTS:

I'm opp. the construction of a new prison & would
instead ask that sources be relocated to the
community offering services such as
education, food that is healthy, employment
& the decriminalization of people of color.

Silvestre-1

NAME: Andrew Silvestre

ADDRESS:

E-MAIL: andrewsilvestre@yahoo.com

Audrey Silvestre

Silvestre-1

This comment opposes the project and supports community resources, employment and "decriminalization of people of color". This comment relates to the merits of the proposed Project. Purely social effects of a project are beyond the scope of CEQA analysis, which focuses on the proposal's effect on the physical environment. This Final EIR, including all comments submitted to the County on the Draft EIR, will be provided to the County of Los Angeles Board of Supervisors. Therefore, your concerns will be presented directly to the decision makers prior to consideration of Project approval.



MIRA LOMA WOMEN'S DETENTION CENTER PROJECT
PUBLIC MEETING- DECEMBER 8, 2015
6:00 TO 8:00 PM

COMMENTS:

Jails already separate families. Family visits are crucial for prisoners to maintain strong connections and reduce recidivism. The longer distance makes it harder for family members to visit their loved ones and check up.

Solorzano-
1

NAME: Rafael Solorzano
ADDRESS: 3765 Vinton Ave, Los Angeles 90034
E-MAIL: _____

Rafael Solorzano

Solorzano-1

This comment expresses concerns that jails separate families and the proposed site in Lancaster makes contact harder.

The Draft Environmental Impact Report (EIR) acknowledges that increased driving distances would be required for some families due to the location of the site in relation to the Century Regional Detention Facility (CRDF) in Lynwood, which is closer to higher density urban areas near the City of Los Angeles. The County is aware of the potential challenges the increased distance may pose for some visiting family members, while for other visiting family members from the Lancaster and other County areas, the Project location will be closer to their homes than the current women's jail in Lynwood.

The County is aware of the potential challenges this increased distance may pose for some visiting family members, while for other visiting family members from the Lancaster and other County areas, the Project location will be closer to their homes than the current women's jail in Lynwood. Efforts to minimize any inconveniences of increased distance include PDF GHG-2 in Section 4.6, Greenhouse Gas Emissions. The Project will provide a combined minimum of 34 video-visiting stations on site, along with video interview rooms in transitional housing buildings. This is anticipated to reduce VMT associated with vehicle travel to the MLWDC by inmate visitors, while allowing more opportunities for video-visiting than currently exist at CRDF, where most female inmates are housed.

Importantly, the proposed MLWDC will accommodate various forms of visitation, including traditional non-contact visiting, telephone access, video visiting, and contact visiting. Contact visits refer to opportunities for inmates and visitors to interact face to face, allowing for physical contact. Non-contact visits refer to visitations where the inmate and the visitor are separated by a glass barrier, and no physical contact is allowed. Video visits refer to long-distance visitation that can occur through a video conferencing program, allowing the inmate and the visitor to hear and see each other via the computer and screen. Therefore, video visiting is a component of a visiting program. As demonstrated in Table 3-5 of the Draft EIR, the MLWDC would also allow contact visits, which are not currently allowed at CRDF.

Additionally, as demonstrated on page 3-4, in Section 3.0, Project Description, the Board of Supervisors directed the establishment of an Advisory Board (now called the Gender Responsive Advisory Committee) that will report to the Board of Supervisors on specific programmatic and operational issues. The Advisory Committee has already begun to organize its meetings with a membership including representatives of County staff, outside agencies, advocates, organizations, individuals with incarceration experience, and representatives with expertise in reducing recidivism of female inmates. As part of its charge, the Advisory Committee is tasked with reviewing the program model for the proposed MLWDC Project to ensure that it is evidence-based in reducing recidivism; evaluating strategies to reduce negative impacts of operating the proposed MLWDC away from the downtown Los Angeles area, including contract transportation for visitors, video visiting for attorney consultation; and reviewing national best practices for visiting and family reunification.

January 12, 2016

County of Los Angeles Chief Executive Office
Capital Projects/Debt Management Division
Attn: Mira Loma Women’s Detention Center EIR
754 Kenneth Hahn Hall of Administration
500 West Temple Street
Los Angeles, California 90012

Dear Chief Executive Office,

As a student in Urban Sustainability and a long-time member of the LA No More Jails, Coalition, I am responding to the Draft Environmental Impact Report (DEIR) for the proposed Mira Loma Women’s Detention Center (MLWDC) dated November 9, 2015. The draft report prepared by BonTerra Psomas for the Chief Executive Office of the County of Los Angeles does not address many negative environmental impacts on human populations and it does not propose adequate solutions to mitigate environmental harm to the Lancaster community, the people who would be incarcerated, and staff.

} Sutton-1

The EIR fails to adequately address many serious issues specific to the project site and surrounding area including Valley Fever, increased smog and traffic pollution, potential Native American resources, suitable energy sources, and water resources in the context of drought.

} Sutton-2

The DEIR suggests that the nests of birds will be protected during construction and renovation of the jail site at the Mira Loma Detention Center in Lancaster. Yet, the report does not address the destruction of families and distress to children that is a direct result of extracting women from their communities and incarcerating them in LA County Jails.

} Sutton-3

In the U.S., around 2.7 million children have a parent who is locked up in prison or jail. Nell Bernstein states, “The growing number of children with an incarcerated parent represents one of the most significant collateral consequences of the record prison population in the U.S.” (as cited in Rutgers, 2014). The number of women in prison increased by 587% between 1980 and 2011 (Rutgers, 2014). “Roughly two-thirds of women in prison are women of color, representing the fastest growing prison population” (Rutgers, 2014). Most often, the women are

} Sutton-4

incarcerated for non-violent drug crimes and “survival crimes”. They are often victims of sexual and physical abuse. (Levi & Waldman, 2011; D.S. & Hewko, L., 2014)

In Los Angeles County, no less than 174,000 children have a parent who is in jail or prison, or on probation, or parole (Families and Criminal Justice, 2015). In 2013, there were 1400 mothers inside L.A.’s jails. The trauma that results from the separation of children from their parents can cause permanent damage to families and society. (Families and Criminal Justice, n.d.). Children suffer from toxic stress that induces high levels of cortisol in their bloodstream similar to what happens when someone faces a life-threatening situation (Lefer, 2014). “Toxic stress can change the chemistry and architecture of the developing brain, potentially with lifelong consequences.” (Lefer, 2014).

Los Angeles District Attorney, Jackie Lacey states that 17% of the men and 24% of women in the L.A. County jail have a severe mental health condition (L.A. Times, 2014). Black people make up 9.6% of the Los Angeles County population yet; they are 30% of the jail population and 43% of those in jail with a serious mental health condition (Palta, 2014).

The solution to repairing the devastation caused by decades of over-incarceration is to stop locking people up and to renew people’s lives by enabling them to use their energy to rebuild their own communities. To mitigate the overall environmental harm to communities of color, the Los Angeles County Board of Supervisors must invest in solutions that will reduce incarceration rates and invest in the development of Women’s Center’s and “Eco-Villages” in every county service area, rather than pretending a jail, in any form, can be a curative solution.

In recent years, cities and counties across the state have adopted plans to create more sustainable communities, to reduce traffic and carbon emissions, improve air quality and improve the health of the community at large. The incarceration of the most vulnerable women in the county of Los Angeles defies all the principles of sustainability.

First, it is not a win-win solution. There is a huge disproportionate distribution of wealth in Los Angeles County and the evident disparities, as to who is healthy, who is homeless and who goes to jail breaks records worldwide. Second, the full cost of building a women’s jail has not been calculated. The projected cost to build the women’s’ jail in Lancaster is \$120 million, but in the end it will be much more. Jail construction is to be financed with \$100 million dollars generated by the state through the sale of Lease Revenue Bonds. Investors on Wall Street, like Goldman Sachs, Wells Fargo, J.P. Morgan, and the like, will double and triple their investment

Sutton-4
cont.

at the expense of California taxpayers, who are already struggling, and who did not have a chance to vote on the jail in the first place. Third, future generations of California taxpayers will bear the burden of a massive debt and the ongoing disenfranchisement of families and communities. We cannot measure the compounded impact of the carceral debt for future generations. “The uneven geographic distribution of incarceration in poor communities and communities of color means that the effects radiate beyond the individual to the broader community, presenting profound long-term consequences for family integrity, public health and general quality of life” (Rutgers, 2014). Incarcerating poor women and women of color, who have been victims of violence and sexual assault, is not ethical, it is not environmentally sustainable if the County acknowledges these communities. There is no justification.

When the criminal justice system severs women from their children and their loved ones, the dynamic balance of the community is altered. Women provide and require social interaction that is crucial to the health and well-being of everyone (Clone & DeHart, 2014). “Social ties among individuals, neighbors...are a source of considerable strength and advantage...a primary source of support sense of community” (Chang & Sullivan, 2011). When women are isolated in prison or jail, they are alienated and degraded—as is their home environment.

When we sequester over 1600 women in jail, their energy that could be applied more productively to benefit their families and community, is diverted. High incarceration rates in Los Angeles have extracted massive amounts of usable energy from the poorest communities. At the same time, thousands of members of the surrounding urban society, spend unprecedented amounts of energy and billions of dollars to lock people up and destibalize other peoples’ communities.

If the County will protect a nest of baby birds it is a outrageous contradiction that there is no effort to protect and care for black and brown children and their mothers. As affluent as Los Angeles is, there has been little energy spent to rebuild communities that are disenfranchised by mass incarceration. To turn things around and correct what has gone wrong will require an intentional effort.

The investment of energy to build Womens’ eco-villages throughout Los Angeles County is a dynamic solution that will prevent the incarceration of women, heal families, save children and create healthy communities. An eco-village is an intentional community that addresses the sustainability concepts: economy, the environment, and social equity. They are designed to

Sutton-4
cont.

Sutton-5

Sutton-6

incorporate local resources and participatory processes “to sustain and regenerate social and natural environments” (Global Eco Village Network, n.d.). The underused and degraded energy of the women, who would be incarcerated, will be transformed and invested in their communities. They will enjoy a sense of purpose, belonging, safety, and a place to call home.

Sutton-6
cont.

Building a women’s jail in Lancaster, CA would increase Los Angeles’ contribution to degradation to the environment in many aspects. To remove women to an area recognized as a site for Valley Fever, where 40% of the women will potentially come down with flu like symptoms. Black and women of Philippine origin are most vulnerable. To jail over 1600 women 70 miles from where they live, will increase automobile traffic in the area. Visitors, staff, and attorneys will be forced to drive the long distance. Transportation of the prisoners on a daily basis will increase CO2 emissions, which cause global warming. Lancaster is in the high desert in the Antelope Valley. Like much of Southern California, there is little biota to absorb excess CO2 emissions. Second, according to the initial draft of an Environment Impact Report the air quality surrounding the old Mira Loma Detention is recorded as “in Severe-17 Nonattainment for ambient ozone (O3) concentrations. The State has designated the area as being in nonattainment for the State standard for respirable particulate matter with a diameter of 10 microns or less (PM10) and in Extreme Nonattainment for O3”. The air quality is not safe; there is too much particulate matter in the breathable air and too much ozone. Ozone is a “colorless and highly reactive gas... a major ingredient of photochemical smog” (Miller et al, 2014, pg. 479). High concentrations of ozone in the troposphere close to the ground cause asthma, increase lung and heart disease and reduce resistance to respiratory illnesses (Miller et al, 2014, pg. 479). The formation of Photochemical smog happens when a mixture of chemicals including Nitric oxide (NO), a major air pollutant, released in car exhaust and reacts to sunlight. Third, there is underground toxic waste storage and old fuel tanks on the site that contaminate the soil and the groundwater that would service the jail. Fourth, there is a water shortage throughout California. The Antelope Valley is in a legal battle to figure out who will get the scarce amounts of water that is available. Opening a new jail in the vicinity will increase the demand for water at a time when the region should restrict the use of groundwater.

Sutton-7
Sutton-8

Sutton-9

Sutton-10

Sutton-11

The Mira Loma site in Lancaster is not a healthy place for women, or for those who work there. Nearby, there is a youth detention center, Camp Jarvis, holding an undisclosed number of juveniles, and California State Prison (LAC) incarcerating 3471 men, 150.9 percent over

Sutton-12

capacity (Department of Corrections and Rehabilitation State of California, 2015). Another jail will further disrupt the natural nutrient cycles worsening air quality, water scarcity, soil contamination and groundwater pollution. A women's jail will also exacerbate the destruction of the human part of natural capital, extremely vulnerable women, their children, and their broader communities that have already suffered from disproportionate levels of abuse and social disenfranchisement. Incarcerating women and keeping them from their children promotes poor health, increased mental illness, and ongoing poverty for both parent and child (Rutgers, 2014).

Sutton-12
cont.

Attached I am also including the concerns compiled by the LA No More Jails Coalition to emphasize my support.

Sutton-13

I look forward to your response.

Sincerely,

Mary Sutton

Candidate in the MA in Urban Sustainability at Antioch University Los Angeles

LA No More Jails Coalition.

Msutton1@antioch.edu

310.709.8602

References

- Chang, C. & Sullivan, W. (2011). Mental Health and the Built Environment. In Dannenberg, A. L., Frumkin, H., & Jackson, R. *Making healthy places: Designing and building for health, well-being, and sustainability*. (pp. 108-109 of chapter 7). Washington, D.C. Island Press.
- Clone, S., & DeHart, D. (2014). Social Support Networks of Incarcerated Women: Types of Support, Sources of Support, and Implications for Reentry. *Journal of Offender Rehabilitation, 53, 7, 503-521*.
- Department of Corrections and Rehabilitation State of California. (2015, March 11) Estimates and statistical analysis section offender information services branch. Retrieved from http://www.cdcr.ca.gov/Reports_Research/Offender_Information_Services_Branch/WeeklyWed/TPOP1A/TPOP1Ad150311.pdf
- Families & Criminal Justice. (2014). [homepage] . Retrieved from <http://www.familiesandcriminaljustice.org/>
- Families & Criminal Justice. (n.d.). *Kids and Realignment*. Retrieved from <http://www.familiesandcriminaljustice.org/#!kids--the-realignment/c1bxw>
- Global Ecovillage Network Africa (n.d.). *GEN—connecting communities for a sustainable world*. Retrieved from http://gen.ecovillage.org/sites/default/files/files/gen_vision_mission_strategic_goals.pdf
- L.A.Times. (2014, July 24) *L.A. County should invest \$20 million to keep mentally ill out of jail*. The Times Editorial Board. Retrieved from <http://www.latimes.com/opinion/editorials/la-ed-mentally-ill-community-treatment-mark-ridley-20140725-story.html>

- Lefer, D. (2014, Dec. 5). Children with incarcerated parents: Trauma, toxic stress, & protection, *LA Progressive*. Retrieved from <https://www.laprogressive.com/children-with-incarcerated-parents/>.
- Levi, R., & Waldman, A. (2011). *Inside this place not of it*. San Francisco, CA. McSweeney's and Voice of Witness.
- Miller, G.T. & Spoolman, S. (2014). Environmental problems, their causes, and sustainability. *Living in the environment*. (18 ed). pp. 5-10 of chapter 1. Belmont, CA: Brooks/Cole.
- Miller, G.T. & Spoolman, S. (2014). Science, matter, energy, and systems. *Living in the environment*. (18 ed). pp. 40-43 of chapter 2. Belmont, CA: Brooks/Cole.
- Miller, G.T. & Spoolman, S. (2014). Environmental hazards and human health. *Living in the environment*. (18 ed). pp. 454 of chapter 17. Belmont, CA: Brooks/Cole.
- Miller, G.T. & Spoolman, S. (2014). Air pollution. *Living in the environment*. (18 ed). pp. 479-485 of chapter 18. Belmont, CA: Brooks/Cole.
- Palta, R. (2014, August 11). *Report: High percentage of LA inmates suffering with mental illness are black*. 89.3 KPCC. Los Angeles, CA. Retrieved from <http://www.scpr.org/news/2014/08/11/45880/report-high-numbers-of-inmates-with-mental-illness/>
- Rutgers University. (2014). *Children and families of the incarcerated fact sheet*. Camden, NJ. National Resource Center on Children & Families of the Incarcerated.

ATTACHMENT 1

Who will monitor the design-build process to ensure any changes made are in compliance with CEQA Guidelines? What types of changes would warrant an addendum?

} Sutton-14

What are the estimated costs of the proposed mitigation measures? Has the price tag for the jail increased? What are the total estimated expenses so far?

} Sutton-15

What are future projects in the area and how will they impact the project site? How will future projects intensify significant impacts to the environment? Please list with detail all additional relevant policies and regulations in each topic area.

} Sutton-16

4.1 AESTHETICS

Substantial adverse effect on a scenic vista:

The radio tower, when considered alone, may not significantly alter the view of scenic resources. However, its construction, which will likely require large machinery, may potentially significantly alter or block the view of scenic resources, particularly when compounded with the large water tower in the same viewshed.

} Sutton-17

Page 117, 4.1-12:

Mitigation of adverse lighting effects is proposed through MM AES-1, yet no details are provided. An EIR is required to contain “ways in which any adverse effects of such a project might be minimized” (PRC 21061). Because the specifics of a Lighting Plan are not provided, but only its intended mitigation, readers of the EIR are unable to assess the adequacy of such a plan and mitigation based on concrete data.

} Sutton-18

4.2 AIR QUALITY

The report fails to address the long-term impact of Valley Fever to prisoners, personnel, visitors and neighboring residents (i.e., the homeless shelter). The long-term impact of Valley must be

} Sutton-19

analyzed as the disease is endemic to Antelope Valley.¹ Recent findings in the article, “The Changing Epidemiology of Coccidioidomycosis in Los Angeles (LA) County, California, 1973–2011,” by Ramon Guevara of the LA Department of Public Health, should be considered in the final EIR. Findings include notable changes in the epidemiology of coccidioidomycosis in LA county started in 2004 and include significant increases in case numbers and incidence rates across various demographic categories and geographic areas, a sudden and substantial rise in female cases, and collectively more annual cases in the endemic areas, especially high case numbers and incidence rates in the Antelope Valley. The county should consult with Fugitive Dust and Health and Valley Fever Scoping Group in Antelope Valley.

Sutton-19
cont.

There is a Valley Fever “hot spot” close to the project site that requires further investigation into potential long-term impacts on people, e.g., prisoners and residents nearby. The report states that “The nine prisons and facilities identified by the CDCR as having a higher risk of exposure to Valley Fever do not include the California State Prison- Los Angeles County, located in the City of Lancaster, which is adjacent to the MLWDC Project site. As such, the CDCR has not identified the Lancaster area being a geographic location that requires screening or interventions for the State prison population with regard to exposure to Valley Fever.” Referring to CDCR’s list of high risk facilities is neither scientifically adequate nor does it have any analysis of the actual danger of contracting Valley Fever at the project site. As a counterexample, a severe and highly-publicized case of Valley Fever in California State Prison – Los Angeles County was reported on by Mother Jones this year.²

Sutton-20

Rather than mitigate the contraction of Valley Fever by sensitive receptors (i.e. prisoners, staff, visitors), the DEIR states that “because the majority of the Project site will be paved or landscaped, there are few opportunities for on-site soils to produce airborne dust...The operation of the MLWDC will follow standard LASD procedures for medical care and prevention with regard to health care for inmates in general, and Valley Fever specific all [sic] and will continue to coordinate with LACDPH (Masis 2015).” The report essentially and inadequately dismisses the very real possibility of Valley Fever contraction among sensitive receptors. Antelope Valley

Sutton-21

¹ <http://journals.plos.org/plosone/article?id=10.1371/journal.pone.0136753>

² <http://www.motherjones.com/environment/2015/01/valley-fever-california-central-valley-prison>

is a high wind area, meaning that infectious spores may become airborne from surrounding soils not considered “on-site.”

} Sutton-21
cont.

The report fails to consider frequent clinical misdiagnosis of coccidioidomycosis cases.³ How will the project ensure proper diagnosis and treatment of Valley Fever?

} Sutton-22

Analysis of motor vehicle pollutant fails to consider additional traffic necessitated by services contractors and/or vendors, e.g., laundry. Since the project site will not include a laundry site, how frequent will laundry services occur? Will this service be contracted? If so, with what company and where? How will the regular travel to the jail to pick up laundry impact additional pollutants from motor vehicles? What other vendors will the project require? How will regular visits by truck from service/delivery vendors to and from the jail impact air quality? What is the estimated vehicle mileage incurred by all delivery/service trucks in two weeks?

} Sutton-23

“Air quality plan” is vague. Please provide examples of potential air quality standard plans.

} Sutton-24

The report states that 44% of the site will be outdoors; 1.5 out of 46 acres will be outdoor recreational space. What are the long-term impacts of potential exposure to Valley Fever during outdoor recreational activities? Where will the imported soil (for garden beds) come from? The soil must be tested and the results of which should be included in the final EIR.

} Sutton-25

What soil tests have been conducted on the project site for Valley Fever specifically? What were the findings? How many, if any, tests have been completed? Who conducted the test? Please include documentation of soil testing on the project site for Valley Fever in the final EIR.

} Sutton-26

What are the potential impacts of increased pollutants on the health of prisoners? What mitigation measures will be provided during outdoor recreation?

} Sutton-27

What are long-term mitigation measures for Valley Fever with regard to the soccer field, running track and other outdoor recreational area?

³ <http://publichealth.lacounty.gov/acd/docs/cocciRxarticle.pdf>

4.3 BIOLOGICAL RESOURCES

Pg. 155, 4.3-10

What are the few wildlife species expected to use the site? How will refurbishment of MLDC impact the habitat or movement of wildlife species?

Sutton-28

Describe in detail how the project will directly and indirectly impact nesting habitat for migratory birds. What are the migratory patterns of birds expected to occur, and what are proposed mitigations? When do active nests occur during the year?

The project proposes to mitigate the loss of an active nest by requiring seasonal avoidance or pre-construction surveys for nesting birds. If the duration of construction is 35 months, how will the construction of this project avoid particular seasons? How will pre-construction surveys mitigate the indirect impacts of a 35 month construction period?

Sutton-29

How will MBTA regulations be enforced and monitored for compliance during the construction phase?

154, 4.3-12

The project projects construction to begin in December 2016 for a duration of 35 months. MM BIO-1 prohibits removal of trees supporting roost sites during bat maternity roost season (March 1 to July 31). However, the demolition of bat maternity roosts will indirectly impede the use of wildlife nursery sites, as the colony will not be able to return to their nursery site.

Sutton-30

What are the ecological impacts of removing bat maternity roosts in the area? How will the removal of colonial and solitary roosts sites impact the regional population of the bat species?

MM BIO-1 is contradictory in that it calls for the complete removal of nests in order to mitigate the project's interference of wildlife movement. MM BIO-1 is not an appropriate nor effective in reducing the impact of removing occupied bat maternity roosts.

Sutton-31

Which program of the Los Angeles County Department of Public Works will be provided the results of the pre-construction bat habitat assessment? Will this be available to the public. I would recommend the county to include the details of this assessment in the final EIR.

The name, credentials or institutional affiliation of the Biologist(s) conducting pre-construction surveys and assessments must be disclosed. We recommend the county to seek specifically a conservation biologist.

MM BIO-2 proposes “an appropriate buffer zone” around an active nest if found. What exactly constitutes an appropriate buffer zone? Is there a standard determined by the American Institute of Biological Sciences? Will the standard be used? If not, why?

Sutton-32

Sutton-33

4.4. CULTURAL RESOURCES

Letters to native american consultations = appendix C-3

look at appendix C-2

Page 171, 4.4-10

The last paleontological resources record search was performed in 2008. The county must verify that no discovery of fossil localities have been recently recorded with the project site. These references must be updated by the NHMLAC.

Sutton-34

Page 172, 4.4-11

In assessing potential effects of Native American artifacts, BonTerra Consulting only received one response. It is not indicated whether follow up was made to the remaining six individuals, as recommended by the Native American Heritage Commission. The county must ensure that all the Native American tribes and individuals are consulted, not simply informed.

Sutton-35

Beverly Salazar Folkes informed us on December 8, 2015 that she never received the informational letter, dated February 3, 2014.

Page 180, 4.4-16

The determination of “non-contributor” to the historic designation of the Old Lock Building requires justification and further investigation. Built in 1946, it is located directly adjacent to Old Hangar 2. Its demolition potentially affects the historical significance of the site. Similarly, the Quonset Hut (built c. 1971) and Wooden Shed (built c. 1959), are also slated for demolition, but fall under the 45 year requirement for assessment as potentially warranting individual preservation as historic structures. These assessments are not provided. Additionally, demolition of these structures together for the creation of a parking lot will have a cumulative detrimental impact on the site’s feeling, historic association, setting, and design.

Sutton-36

Page 182, 4.4-18

The name, credential and/or institutional affiliation of the Paleontologist retained by the county to monitor excavations must be disclosed.

If a fossil resource is determined to be significant, any plan formulated by the paleontologist must be disclosed and detailed in the final EIR or an addendum.

Sutton-37

What are the short-term and long-term impacts of excavation activities with regard to Valley Fever and fugitive dust? What are proposed mitigation measures for fugitive dust and exposure of Valley Fever during the excavation of native soils?

Sutton-38

MM CUL-1 and MM CUL-2 are not sufficient mitigation measures. All pre-construction assessments/surveys must be documented in the Environmental Impact Report (EIR) to ensure compliance with CEQA Guidelines. Archaeologists and paleontologists must conduct their evaluations and submit their findings as part of the final EIR. There is no third-party monitor to ensure compliance with CEQA after the final EIR is approved. The only option to ensure compliance is to complete pre-construction assessments prior to the completion of the final EIR.

Sutton-39

GEOLOGY AND SOILS

Page 193, 4.5-4

How will continued drought conditions and further depletion of groundwater in the area affect the project site's susceptibility to liquefaction in areas of localized perched groundwater?

} Sutton-40

Page 196, 4.5-7

Antelope Valley does experience very high winds from March through July. What are proposed mitigation measures to prevent fugitive dust and exposure of Valley Fever to the construction workers, scientific monitors, and the residents proximate to the project site during construction?

} Sutton-41

Page 197, 4.5-8

Drought conditions and depletion of groundwater will continue; thus, subsidence will worsen causing damage to the foundation of the structure. How will the county propose appropriate mitigation measures given current and projected conditions? What are anticipated hazards for the prisoners residing in the jail should further subsidence occur? What are estimated operational costs for repair and maintenance of overlying structures, foundations and walls?

} Sutton-42

The findings of a geotechnical investigation must be disclosed in the final EIR. The determination of "less than significant impact" must be justified in detail.

} Sutton-43

GREENHOUSE GAS EMISSIONS

Page 211, 4.6-10

Water resource summary of general environmental effects of climate change does not include recent drought conditions and its exacerbation of reduced water supplies.

} Sutton-44

Page 215, 4.6-14

The report states that "soil import and export are not anticipated for the Project," however, the raised garden beds for the project's on-site recreational activities "will be filled with imported soils derived from outside the Antelope and Kern Valleys" to prevent prisoners from interacting with local soil. The construction activity impacts are incorrect and must be updated in to include energy expended for soil import and export.

} Sutton-45

Furthermore, the construction input data fails to account for the import of water for prevention of fugitive dust and exposure to Valley fever when breaking ground.

Sutton-45
cont.

The construction input data fails to account for removal of hazardous waste.

The report states that “GHG emission-reduction measures for construction equipment are relatively limited.” This statement requires further justification/evidence. What is the inventory of construction equipment for this project? What are the average GHG emissions of each equipment?

Sutton-46

Report states that construction will begin in November 2016. In other pages, December 2016 is the projected start date for construction.

Sutton-47

The report concludes that a separate significance finding for construction emissions is not necessary. This requires further justification and the report must provide the threshold for construction annual GHG emissions.

Sutton-48

Page 216, 4.6-15

If the design-build contractor requests an expedited schedule, the total GHG emissions would not be the same if project assumes at 5-day work week. The purported “offsetting decreases” are groundless assumptions that cannot be used to claim a reduction in total GHG emissions even if the number of work days increases. Total GHG emissions must be recalculated assuming a 6-day work week.

Sutton-49

Failure to accurately include all operational GHG emissions (e.g., vehicle emissions from service/deliver truck) requires the estimated operational annual GHG emissions to be recalculated.

Sutton-50

How was the operational annual emissions for each source area (energy, mobile, etc) calculated?
How do these numbers compare to annual emissions of MLDC when it operated under

Sutton-51

Immigration and Customs Enforcement? Please provide the operational annual emissions of the facility when it was last used, and how the county determined input estimates for electricity, natural gas, water and solid waste.

} Sutton-51
cont.

The conclusion that total annual estimated GHG emissions for the project would result in less than significant GHG emissions is not accurate. GHG emissions must be recalculated to include all input and output data.

} Sutton-52

Page 218, 4.6-17

The development of Project-specific ECRP must be created and disclosed in the final EIR to ensure compliance of mitigation. If the proposed measures of ECRP are not feasible, it is not appropriate to claim an overall reduction in GHG emissions.

} Sutton-53

PDF GHG-2 projects GHG emissions reduction with the placement of video-visiting stations at the Project site. However, it is erroneous to assume that in-person visitations will decrease with the availability of video visitations. There is no evidence to prove correlation; thus, the report cannot conclude a reduction in total GHG emissions based on this assumption. In fact, given the jail site's proximity to different areas of Los Angeles and neighboring counties, one can conversely assume that family/friends, who may live in Antelope Valley or Kern County and could not previously visit their loved ones at CDRF due to the distance, will now frequent the jail.

} Sutton-54

PDF GHG-3 projects GHG emissions reduction by posting AVTA bus transit and Metrolink schedules. This is illogical and inappropriate to assume that simply posting transit schedules will encourage use of public transportation. This reasoning fails to account for an array of reasons for why people are unable to use public transportation. Moreover, it is irresponsible and deceptive to then claim definitively that there will be a reduction in total annual GHG emissions (and therefore no significant impact needs to be addressed).

} Sutton-55

PDF GHG-4 proposes GHG emissions reductions by providing secure on-site bicycle storage for both staff commuting and visitors. Again, this is groundless. Simply setting up bicycle storage does not guarantee a reduction in VMT associated with vehicle travel. Therefore, the project cannot assume a reduction in overall annual GHG emissions. The project acknowledges uncertainty of staffing availability in Antelope Valley, and cannot claim definitively that staff commuting would live locally. Additionally, there is only one dedicated bicycle lane in the freeway and roadway system of the project; that is, the bicycle lane only on the east side of Valley Central Way. There are no proposals by the project, city or county to expand bicycle lanes in Lancaster or Antelope Valley.

Sutton-56

Given these contradictions, the Project must recalculate total annual GHG emissions without purported “offsetting decreases”. The above comments challenge the report’s finding that the project would have no impact on GHG emissions.

Sutton-57

The report fails to address how conditions of climate change will affect the project’s water supply and impact on Los Angeles county’s water supply. Additionally, the report does not address how the spread of Coccidioidomycosis will intensify with higher temperatures, drier land, loosened soil/sand and other environmental effects of climate change. Furthermore, the report states that the degrading quality of our air will increase the spread of infectious diseases and their vectors but does not consider Valley Fever as one such infectious disease. The environmental effects of climate change will exacerbate prominence of coccidioidomycosis which is already endemic to the project site. Women are particularly vulnerable, evidence in Dr. Ramon Guevara’s article published September 2015. Therefore, the Project must thoroughly assess the potential health impacts on the women who would be forced to relocate to the project site.

Sutton-58

The project must assess the environmental effects of climate change on air quality, water supply and the spread of Valley Fever.

HAZARDS AND HAZARDOUS MATERIALS

Regarding the onsite underground storage tanks at the central plant that has failed leak detection tests and has not been corrected. There is not mitigation proposed to repair or remove this underground storage tank. It is possible that over time, with use or not, hazardous waste will continue to leak and potentially contaminate the soil and groundwater.

} Sutton-59

Page 229, 4.7-8

Report states that when six older USTs at the MLDC were removed, contamination was found in the soil. The soil contamination was remediated. Which county department oversaw the remediation of the contaminated soil? Please disclose this information.

} Sutton-60

Minor staining of the carpet and hydraulic oil on the concrete floors beneath the emergency generator were found in 2014. Despite this, the report states that no leaks were observed. What was the minor staining on the carpet and where did the hydraulic oil come from? What led the county to conclude that no leaks were observed despite staining and presence of oil.

} Sutton-61

Regarding asbestos and lead sampling, the report must justify why Building 27-29 were not sampled.

} Sutton-62

Pg 232, 4.7-11

The report notes that two USTs at the fueling station were found to not have current permits and have failed leak detection tests. There are no proposed mitigations to update permits and repair/remove the leaking USTs.

} Sutton-63

4.8 HYDROLOGY AND WATER QUALITY

Regarding the adjudication of groundwater rights, how might the outcome affect water supply for the proposed jail? What are the associated costs? Will the proposed jail contribute to further overdraft of groundwater in LA County, not just Antelope Valley? What is the well flow rate, well yield, water quantity and rate of replenishment of LA County Waterworks District 40 water line and Antelope Valley-East Kern Water Agency (AVEK)?

} Sutton-64

The impact on Waterworks District 40 water line and supply must be considered in light of drought conditions. The entire county, not just Antelope Valley and underlying groundwater sources, is in a state of overdraft. What is the impact of this project on the water supply of Waterworks District 40 and AVEK?

Sutton-65

The historic well production statistics are outdated. The intensification of drought conditions in recent years (post 2012) warrants an updated study.

Sutton-66

How do they monitor compliance during construction? For example, the report states that compliance with NPDES Construction General Permit would ensure the project does not violate water quality standards, but during the construction process, how will water quality standards be monitored?

Sutton-67

The report states that increased storm water runoff could result in erosion if site improvements are not conducted in compliance with regulations. What third party monitor will be in place to ensure compliance during construction and operational use?

What are the associated costs with a new drain system?

Sutton-68

The report states that the project will not use groundwater supplies for long-term operations. Imported and recycled water is proposed as an alternative. What are the long-term impacts of importing water on traffic and air quality? Where will the recycled water come from? Are there safety and hygiene concerns with using recycled water?

Sutton-69

Construction and disturbance of soil will occur before the new water pipeline is completed. Spraying the ground with water is proposed as a mitigation measure for Valley Fever during construction. What water supply will be used during construction?

Sutton-70

4.9 LAND USE AND PLANNING

4.10 NOISE

4.11 POPULATION AND HOUSING

Are growth projections reconciled with environmental impacts? For example, Table 4.11-6 projects an increase of ~20,000 people in 2020 (from 2008) — is this projected population considered in the long-term analysis of water usage in Lancaster?

} Sutton-71

Jobs at the jails are not the type of job creation that the community needs. What percentage of the unemployed population in Lancaster would qualify as an employee of the sheriff's department?

} Sutton-72

4.12 PUBLIC SERVICES AND RECREATION

Page 4.12-3

The report states “neither the project site nor the city of Lancaster is located within areas identified to have “very high fire hazard severity.” However, in the Hazardous Waste section, the report claims that the project site is is at least 4.5 miles from the edge of an area determined to be “very high fire hazard severity.”

} Sutton-73

Outdoor recreation area is required for detention facilities. However, no mitigation measures have been proposed for the outdoor recreational space (soccer field, running track and gardening areas) and potential exposure to Valley Fever and poor air quality.

} Sutton-74

It is not indicated whether the full-sized sports court for volleyball and basketball is outdoor or indoor.

} Sutton-75

4.13 TRANSPORTATION AND TRAFFIC

Analysis based on Traffic Impact Study prepared by Linscott, Law and Greenspan (LLG) in April 2015. Visitation is by appointment only during weekends and holidays; traffic impacts of

} Sutton-76

visitation based on review of existing visitation levels at CRDF/Lynwood as provided by the sheriffs.

Limited assessment of traffic when focusing on visitors alone. There will be an increase in traffic from service/delivery trucks and vendors.

Regarding alternative transportations, will the frequency of bus routes from LA to Lancaster increase? Is there a bus stop within .25 miles of the project site? Will there be additional bus routes created?

There is only one bicycle lane on one road near the project site. There are no proposed bikeways to facilitate transportation to the project site.

} Sutton-76
cont.

} Sutton-77

} Sutton-78

4.14 UTILITIES AND SERVICE SYSTEMS

4.15 ENERGY

Mary Sutton (January 12, 2016)

Sutton-1

This comment provides a general introduction to the comment letter and alleges a failure to address environmental impacts of the Project. The Draft Environmental Impact Report (EIR) for the proposed Project has been prepared in accordance with the California Environmental Quality Act (CEQA, *California Public Resources Code*, Sections 21000 et seq.) and the State CEQA Guidelines (14 *California Code of Regulations* [CCR]), and addresses the potential direct, indirect, and cumulative impacts of the Project on all environmental issue areas. Section 5.0, Project Alternatives, was prepared in accordance with Sections 15126.6(a) through 15126.6(f) of the State CEQA Guidelines. As demonstrated throughout the Draft EIR, all potentially significant impacts have been reduced to levels that are less than significant through the identified mitigation measures, and no significant unavoidable environmental impacts would result from Project implementation.

Sutton-2

The Draft EIR does in fact adequately address each of the environmental areas listed in this comment.

Section 4.2, Air Quality, of the Draft EIR addresses the impacts associated with coccidioidomycosis, known as Valley Fever, and pollutant emissions from demolition, construction, and operational activities. Impacts were determined to be less than significant, with compliance with regulatory requirements (RRs) and the implementation of Project Design Features (PDFs). Please see the response for Sutton-7 below for additional information regarding Valley Fever.

Section 4.4, Cultural Resources, addresses impacts to historical, archaeological, and paleontological resources, including potential Native American resources. Impacts were determined to be less than significant, with compliance with regulatory requirements (RRs) and the implementation of Project Design Features (PDFs) and mitigation measures (MMs).

Section 4.15, Energy, discusses Project demands for energy resources and identifies PDFs and RR that would reduce energy demands.

A Water Supply Assessment (WSA) was prepared for this project, although it was not required by law. Section 4.14, Utilities and Service Systems, summarizes the findings of the WSA for the Project that looks at the availability of water to serve the Project during a normal year, a single-dry year and multiple-dry years. As indicated on page 4.14-29, with implementation of MM UTL-1, estimates for water supply and demand during single-dry and multiple-dry years, as provided in the WSA, show that water supply is available to serve the Project during the average year, single-dry year, and multiple-dry years. The WSA concludes that the information on record indicates a sufficient and reliable water supply for Los Angeles County Waterworks District 40 (LACWWD 40), now and into the future, including a sufficient water supply for the Project. These supplies are also sufficient to provide for overall growth in the LACWWD 40 service area at the rate projected in the 2010 Integrated Regional Urban Water Management Plan (IRUWMP).

Sutton-3

This comment relates to the merits of the proposed Project and not the environmental analysis included in the Draft EIR or the environmental impacts of the Project. Purely social effects of a

project are beyond the scope of CEQA analysis, which focuses on the proposal's effect on the physical environment. This Final EIR, including all comments submitted to the County on the Draft EIR, will be provided to the County of Los Angeles Board of Supervisors. Therefore, your concerns will be presented directly to the decision makers prior to consideration of Project approval.

Sutton-4

This comment includes views and data about national and County statistics regarding children with a parent who is in jail; the race, economic status, and health of inmates; and generally the commenter's criticisms generally of the impacts of incarceration. This comment does not relate to the environmental analysis included in the Draft EIR or the environmental impacts of the Project. Purely social or economic effects of a project are beyond the scope of CEQA analysis, which focuses on the proposal's effect on the physical environment. This Final EIR, including all comments submitted to the County on the Draft EIR, will be provided to the County of Los Angeles Board of Supervisors. Therefore, your concerns will be presented directly to the decision makers prior to consideration of Project approval.

Sutton-5

Consideration of a project's impacts on biological resources is a mandate of CEQA, which requires an evaluation of impacts on the physical environment. This comment does not relate to the environmental analysis included in the Draft EIR or the environmental impacts of the Project. This Final EIR, including all comments submitted to the County on the Draft EIR, will be provided to the County of Los Angeles Board of Supervisors. Therefore, your concerns will be presented directly to the decision makers prior to consideration of Project approval.

Sutton-6

The proposed Project does not preclude the Board of Supervisor's consideration of alternate approaches to incarceration, including the commenter's suggestions regarding women's ecovillages.

The Board of Supervisors has adopted numerous recent actions to reduce the number of people who are incarcerated in Los Angeles County, particularly those with mental illness and/or substance use disorders. The Board of Supervisors' 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 in a document entitled "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".

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 Countywide Criminal Justice Coordination Committee. All Advisory Board members participated in the Countywide 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 of Los Angeles Chief Executive Office (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 Re-Entry (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 of Supervisors determined the Office will be a part of the Department of Health Services and the Director of the Office will report to the Director of the Department of Health Services. The Director of this Office will be 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, the Superior Court, the Public Defender, the Alternate Public Defender, Probation, the District Attorney, Mental Health, Public Health, and Health Services.

The Office will oversee Countywide diversion efforts including a system of integrated mental, physical, and public health care services and 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 of Supervisors directed that future budget allocations be a part of the annual budget process. On September 1, 2015, the Board of Supervisors also directed that the Office distribute funding so at least 1,000 individuals would be diverted across all intercept points within the criminal justice system.

The Criminal Justice Mental Health Advisory Board report of August 2015 concluded that, even with increased opportunities for diversion from a jail environment, there will still be a need for mental health treatment in jails and that diversion efforts can reduce, but will not eliminate, the need for the County to operate detention facilities. In light of the County's diversion efforts, the Board of Supervisors directed that, for purposes of ongoing study and evaluation in the environmental review process, the maximum size of the proposed women's detention center at Mira Loma in Lancaster would remain at 1,604 beds. In addition the Board of Supervisors reduced the maximum proposed size by approximately 1,000 beds, for purposes of the environmental review of a separate proposed treatment and detention center addressing needs of incarcerated men and women with mental illness and/or substance use disorders at the site of the current Men's Central Jail in downtown Los Angeles.

Section 5.0, Project Alternatives, of the Draft EIR was prepared in accordance with Sections 15126.6(a) through 15126.6(f) of the State CEQA Guidelines and adequately considers alternatives to the proposed Project. Out-of-custody alternatives were not required to be analyzed in the Draft EIR beyond the No Project alternative analyses and they would not be able to achieve the Project's primary goal, as stated below and in Section 5.3.2 of the Draft EIR.

The Project's goal is to provide detention facilities for low- to medium-security level female inmates that meet modern correctional standards and that prioritize the on-

site integration of gender-responsive female inmate education, treatment, and vocational training. This goal focuses on providing a secure detention facility with cost-effective therapeutic and rehabilitative programs to meet needs of eligible female inmates in order to reduce recidivism.

Potential environmental impacts associated with “no action” on the proposed Project are described in Alternative 1A, No Project/Continuation of Existing Operations, and Alternative 1B, No Project/Predictable Actions, as demonstrated in Section 5.0, Alternatives. These alternatives provide information regarding the potential impacts to the environment if the County does not move forward with the proposed Project.

Sutton-7

The Project site has been unoccupied since 2012, as discussed in Section 2.0, Environmental Setting, but the Project site has generally been in operation and providing various detention/jail functions since 1945–1946, when the California Youth Authority began to run a vocational school for juvenile offenders at the site. The MLWDC Project proposes the adaptive reuse, renovation, and expansion of the majority of the buildings at the Mira Loma Detention Center (MLDC), which is an existing County asset. The redevelopment of the property as the MLWDC would avoid the costs associated with constructing a new facility.

Coccidioidomycosis, also known as Valley Fever, and its potential impact on potential future inmates and County staff is discussed in Section 4.2, Air Quality. A summary of hazards associated with the fungus is provided in the Draft EIR and includes summaries of trends related to Valley Fever in Los Angeles County, as inventoried and reported by the Los Angeles County Department of Public Health (LACDPH), which was consulted during the preparation of the Draft EIR.

As stated in RR AIR-2, the Project will be constructed in compliance with the Department of Health – Infection Control Policy Guidelines Procedure No. 918.01. Policy 918 is intended to prevent the spread of diseases that may be caused by construction-induced airborne pollution in susceptible individuals (patients, staff, and the public) in Department of Health Services (DHS) facilities. The protocols and requirements mandate the designation of an Infection Control Coordinator who must review and approve infection-control plans for new construction or renovation projects to ensure a safe environment. These infection-control plans must include infection-control measures to contain dust, debris, and other elements and protect the patients, employees, and visitors in this environment. The Infection Control Coordinator has independent authority to stop construction-related activities immediately when the public may be adversely affected by infection-control hazards generated during construction-related activities and when the infection-control precautions and/or engineering controls are inadequate to contain the hazard. As such, the Draft EIR states that exposure to Valley Fever during construction activities would be the same as exposure to dust, and, thus, should follow the requirements for the mitigation of dust. Impacts would be less than significant, and no mitigation is required.

Section 4.2, Air Quality, acknowledges that the future inmate population has the potential to be exposed to dust generated from soils within the Antelope Valley, which have the potential to contain *Coccidioides* spores (i.e., the fungus that causes Valley Fever). As discussed in Section 3.0, Project Description, of the Draft EIR, according to the Los Angeles County Sheriff's Department, Assembly Bill (AB) 109 female inmates are serving an average of 423 days in custody from date of sentencing to date of release, while non-AB 109 female inmates serve an average of 107 days in custody. Therefore, the length of time that inmates would be living at the

MLWDC is temporary, and is not equivalent to a permanent living circumstance or the longer sentences in state prisons that house higher-security inmates.

The Draft EIR summarizes the LACDPH 2013 Annual Morbidity Report, which presents the recent trends related to Valley Fever in Los Angeles County, including and increasing incidence rate for reported Valley Fever cases in the last ten years, which has doubled in the past five years. However, the overall incidence rate in the Antelope Valley was not determined to warrant changes in the County's protocol for disease prevention, notwithstanding the fact that the County health and public health officials are well educated on the condition; are familiar with its incidence in the County and elsewhere in the state; and are involved in research and education on the subject of Valley Fever.

The LACDPH has not identified the previous U.S. Immigration and Customs Enforcement (ICE) detainee population at MLDC, the future inmate population at MLWDC, or earlier occupants at the High Desert Health System (HDHS) Multi-Ambulatory Care Center (MACC) (the adjacent hospital facility, which has relocated in Lancaster) as requiring the implementation of health screening protocols or other measures to address potential Valley Fever exposure.

Also, as demonstrated in Section 4.2, Air Quality, the California Department of Corrections and Rehabilitation (CDCR) has not identified the Lancaster area as being a geographic location that requires screening or interventions for the State prison population with regard to exposure to Valley Fever (CDCR 2013). As discussed with the Sheriff's Department staff for the preparation of the Draft EIR, the operation of the MLWDC will follow standard Sheriff's Department procedures for medical care and prevention with regard to health care for inmates in general, and Valley Fever specifically, and the Sheriff's Department will continue to coordinate with LACDPH (Masis 2015). The LACDPH is the designated County agency with the mandate to protect health, prevent disease, and promote the health and well-being of all persons within Los Angeles County. As such, any future changes in LACDPH policies that may be made regarding Valley Fever for inmate populations will be implemented, as applicable, throughout the County jail system.

Because the future inmate population's exposure to disturbed soils would be limited to gardening activities, PDF AIR-3 in Section 4.2, Air Quality, states that the Project will import gardening soils from outside of the Antelope Valley and would be used in raised planting beds to remove gardening in native soil as a potential source of exposure to *Coccidioides* spores. Further, outdoor recreational areas would be covered with landscaping, turf grass, gravel or landscaping/wood chip ground cover that would minimize the opportunity for soils to become airborne.

The Antelope Valley has not been identified by the LACDPH, the Antelope Valley Air Quality Management District (AVAQMD), or any other governmental health agency as a region that should be avoided by the elderly, women, children, health-compromised individuals, or by any specific ethnic groups. The Antelope Valley includes the major population centers of the cities of Lancaster and Palmdale, which have an estimated 2014 combined population of approximately 314,902 people. This portion of the Antelope Valley includes a diverse population of residents that includes many individuals that could be considered to be at higher risk of complications due to infection from *Coccidioides* spores. As stated in Section 4.2, Air Quality, persons at the highest risk of developing disseminated Valley Fever include the very young (under 1 year old); adults over 60 years; immunocompromised individuals; people with diabetes; women in the third trimester of pregnancy; and certain ethnic groups, including African-Americans and Filipinos.

The demographics of the 2 cities include approximately 158,605 females (50.4 percent) and 156,297 males (49.6 percent) with a median age of approximately 30.7 years old. The racial/ethnic composition of the area is approximately 47 percent Latino, 29 percent white,

17 percent African American, and 4 percent Asian (U.S. Census Bureau 2016). As such, the temporary presence of a female inmate population into the Antelope Valley would not introduce a new or unusual demographic into the area that is not already present in the existing population of the region.

The MLWDC property is not located in an area determined to be hazardous to the health of local residents or visitors to the region. The Draft EIR concludes that the potential future inmate population's temporary placement into the Antelope Valley, which includes the inmates' participation in all indoor and outdoor activities at the MLWDC, would not constitute placement into a hazardous existing environmental setting that would require mitigation. Additionally, the operation of the proposed Project would not increase the prevalence of *Coccidioides* spores or otherwise exacerbate an existing environmental condition.

Sutton-8

Section 4.13, Transportation and Traffic, of the Draft EIR discusses potential impacts related to Project-generated traffic. The analysis indicates that an increase in traffic volumes would not significantly impact local intersections (i.e., intersections would still operate at Level of Service D or better) and impacts on California Department of Transportation (Caltrans) facilities would be less than significant.

The Draft EIR acknowledges that increased driving distances would be required for some families with the Project due to the location of the site in relation to the Century Regional Detention Facility (CRDF) in Lynwood, which is closer to higher density urban areas near the City of Los Angeles. The County is aware of the potential challenges this increased distance may pose for some visiting family members, while for other visiting family members from the Lancaster and other County areas, the Project location will be closer to their homes than the current women's jail in Lynwood. As demonstrated on page 3-4, in Section 3.0, Project Description, the Board of Supervisors directed the establishment of an Advisory Board (now called the Gender Responsive Advisory Committee) that will report to the Board of Supervisors on specific programmatic and operational issues. The Advisory Committee has already begun to organize its meetings with a membership including representatives of County staff, outside agencies, advocates, organizations, individuals with incarceration experience, and representatives with expertise in reducing recidivism of female inmates. As part of its charge, the Advisory Committee is tasked with reviewing the program model for the proposed MLWDC Project to ensure that it is evidence-based in reducing recidivism; evaluating strategies to reduce negative impacts of operating the proposed MLWDC away from the downtown Los Angeles area, including contract transportation for visitors, video visiting for attorney consultation; and reviewing national best practices for visiting and family reunification.

Sutton-9

Section 4.2, Air Quality, analyzes the potential for pollutant emissions during demolition, construction, and operation of the Project. The criteria pollutants and the attainment status of the Antelope Valley Portion of the Mojave Desert Air Basin are discussed in this section, along with estimates of pollutant emissions that would be generated by the Project. Impacts were determined to be less than significant, with compliance with regulatory requirements (RRs) and the implementation of Project Design Features (PDFs).

Section 4.6, Greenhouse Gases, discusses the potential for greenhouse gas (GHG) emissions and global climate change. The analysis indicates that impacts would be less than significant, with compliance with RR and implementation of PDFs.

Sutton-10

Underground storage tanks (USTs) at the Project site are discussed in Section 4.7, Hazards and Hazardous Materials, which states that six older USTs at the MLDC were removed in 1999 and contamination was found in the soils. The soil contamination was remediated and the case was closed in 2003. The site was never operated as a site that accepted hazardous wastes for disposal.

As stated on page 4.7-19 of the Draft EIR, the existing fueling station is located outside the Project site boundary, but may be used by the Project. This fueling station has two USTs that previously failed leak detection tests. As shown in the California Environmental Reporting System (CERS) database and the Monitoring System Certification by AW Associates in Appendix E to this Final EIR, the tank permits were updated in 2015 and have passed subsequent leak detection tests and are now in compliance. Soil testing also indicated there is no soil contamination near the USTs (Converse 2016b). MM HAZ-3 requires the testing and repair, as necessary, of the USTs prior to the use of the existing fueling station by the Project.

Sutton-11

The WSA for the Project, as summarized in Section 4.14, Utilities and Service Systems, discusses the adjudication of groundwater rights in the Antelope Valley and that this adjudication will provide a final allocation of groundwater rights for the long-term groundwater management of the Antelope Valley Groundwater Basin. A finite volume of groundwater that the LACWWD 40 can pump without paying penalties or replenishment fees would be assigned as part of the adjudication, and the adjudication judgment provides LACWWD 40 with the rights to pump approximately 22,500 afy to 27,000 afy of groundwater depending on factors including the amount of the Federal reserved right which is not used by the United States and the supplemental yield attributable to return flows from imported water purchased by LACWWD 40 and delivered to its customers. The Integrated Regional Urban Water Management Plan (IRUWMP) for the Antelope Valley projects that groundwater allocation for LACWWD 40 would be based on historical pumping amounts. The LACWWD 40 is projected to have an average annual pumping rate of 23,200 acre-feet per year (afy) from 2015 to 2035 (LACWWD 40 2011). These projections are subject to change after the adjudication has been finalized as the judgment is currently being appealed; however, it is estimated the 23,200 afy allocation is a conservative value and the final adjudicated amount could be higher, as indicated above.

As contained in the WSA, no change in the available groundwater supplies for the LACWWD 40 is projected from 2015 to 2035 (Psomas 2015). Thus, if the final adjudication judgment results in LACWWD 40 having the right to pump a greater amount, it will have the option to pump up to its allocation or pump below its allocation. This will allow the LACWWD 40 to readily provide water supply to the Project and its other customers, as well as reduce its use of imported water sources. If the final adjudication judgment results in LACWWD 40 receiving the right to pump a lower volume of groundwater, LACWWD 40 would have the option to use a greater amount of imported water or to more heavily rely on its programs for water banking; purchase of new imported supplies; water transfers; water conservation; and expansion of recycled water systems.

As indicated on page 4.14-29 of the Draft EIR, the LACWWD 40 will serve the Project with imported water purchased through the Antelope Valley East Kern Agency (AVEK). MM UTL-1 requires that the County sign the New Water Supply Entitlement Acquisition Agreement with the LACWWD 40 and pay a deposit of \$10,000 per acre-foot of annual water demand from the Project for the acquisition of additional water supplies from AVEK to serve the Project. The adjudication judgment prevents overdraft of the Antelope Valley Groundwater Basin by setting the safe yield

of the basin to eliminate the long-term overdraft condition, and creates a Watermaster to enforce the terms of the judgment.

The well flow, well yield, and water quantity of the LACWWD 40 varies by well and period but the LACWWD 40's Integrated Regional Urban Water Management Plan for the Antelope Valley shows historic (2005-2009)⁶ groundwater pumping totals ranging from 12,371 afy in 2006 to 24,901 afy in 2008. The Antelope Valley Integrated Regional Water Management Plan indicates that AVEK operates a groundwater basin banking project (Water Supply Stabilization Project No. 2 [WSSP-2]) that recharges the groundwater basin with imported water during wet years when supplies exceed demands and extracts up to 90 percent of the banked water in drought years when supplies are low. LACWWD 40 participates in the WSSP-2. There is no way to determine the exact source (i.e. well water or imported water, or the particular well yield) of the water that would serve the Project site via the proposed new water pipeline extension from the on-site water lines to the existing 12-inch LACWWD 40-owned distribution pipeline within West Avenue I because LACWWD 40 waters are comingled to meet water quality and distribution requirements.

Sutton-12

This comment provides a general summary of the comment letter and alleges various environmental impacts of the Project. The Draft EIR for the proposed Project has been prepared in accordance with CEQA and the CEQA Guidelines (14 California Code of Regulations [CCR]), and addresses the potential direct, indirect, and cumulative impacts of the Project on all applicable environmental issue areas. Sections 4.1 through 4.15 of the Draft EIR provide analyses of potential environmental impacts of Project implementation on the environment. As demonstrated throughout the Draft EIR, all potentially significant environmental impacts have been reduced to levels that are less than significant through the identified mitigation measures, and no significant unavoidable environmental impacts would result from Project implementation.

Please see the responses to your specific comments in Sutton 1-11 above.

This comment also addresses the merits of the proposed Project, and alleges potential societal impacts. Purely social effects of a project are beyond the scope of CEQA analysis, which focuses on the proposal's effect on the physical environment. This Final EIR, including all comments submitted to the County on the Draft EIR, will be provided to the County of Los Angeles Board of Supervisors. Therefore, your concerns will be presented directly to the decision makers prior to consideration of Project approval.

Sutton-13

Please see responses to the following comments, beginning with the response for Sutton-14.

Sutton-14

The MMs are set forth throughout the Draft EIR and are included in Table ES-2 in the Draft EIR's Executive Summary. Each MM includes a requirement for the timing of implementation, as well as the required monitoring agency. This information is further documented through the Mitigation Monitoring and Reporting Program (MMRP) that is included in the Final EIR package that is presented to the Board for their review and consideration.

⁶ The production statistics used are published data and more current data has not yet been published.

Section 15164 (a) of the State CEQA Guidelines states that an addendum to a previously certified EIR shall be prepared if changes or additions are needed to the EIR, but none of the conditions in Section 15162 requiring a subsequent EIR have occurred. The conditions that would allow preparation of an addendum include changes to the project or the circumstances under which project would be implemented that do not require major revisions to the previous EIR or that would not result in new significant environmental effects or an increase in the severity of the identified significant effects. When new information becomes available but would not change the significant effects of the project or increase the severity of the impacts of the project or would not make new mitigation measures or alternatives feasible, an addendum may also be prepared. Otherwise, a subsequent EIR or a supplement to an EIR may be needed.

Sutton-15

The estimated costs for building the proposed MLWDC from design to occupancy are presented in Item S-1 of the June 9, 2015, presentation to the Board of Supervisors on jail planning. In this presentation, the proposed MLWDC Project is shown to cost approximately \$123.4 million, and the costs are broken down into Assembly Bill (AB) 900 Grant Contribution, net County cost, and other funding sources. These preliminary costs include the costs associated with the mitigation measures included in the Final EIR. An updated total Project cost estimate will be prepared for the Board of Supervisors for their consideration at the time the Final EIR and the proposed Project recommendations are presented to them for consideration. The 2015 document can be viewed at the following website: <http://file.lacounty.gov/bos/supdocs/94070.pdf>.

Sutton-16

Table 2-1, City of Lancaster Cumulative Projects, and Table 2-2, County of Los Angeles Cumulative Projects, in Section 2.0, Environmental Setting, presents a listing of projects that could potentially contribute to impacts from the proposed Project, resulting in cumulative impacts. Cumulative impacts are assessed under a stand-alone heading within each Draft EIR impact section (i.e., Sections 4.1 through 4.15). Regulatory Requirements (RRs) are also included within each Draft EIR impact section (i.e., 4.1 through 4.15) and include applicable local, State, or federal regulations that are required independently of CEQA review and also serve to prevent the occurrence of, or reduce the significance of, potential environmental effects. Typical RRs include compliance with the provisions of the California Building Code, Antelope Valley Air Quality Management District rules, local agency requirements, and other regulations and standards. RRs are identified in the MMRP for convenience of tracking.

Sutton-17

The short-term construction impacts of a radio communications tower would not significantly affect scenic resources or result in a significant aesthetic impact. The Project site is currently vacant and there would be no site occupants to be affected by construction activities. Construction of the tower would require approximately two weeks/14 days of crane operations, which is the only piece of machinery that would be visible above the rooflines of adjacent structures. An important consideration is not just whether the crane is visible, but whether it would result in a "substantial adverse effect" on scenic views. A crane is a narrow structure with a thin profile that would not hide or inhibit views of distant mountains. Short-term deployment of construction-related equipment is a common occurrence and is generally understood to be a temporary visual inconvenience. As demonstrated in Section 4.1, Aesthetics, the Project site has an institutional character due to the utilitarian nature of the facility, which is exemplified by the security fencing with barbed wire that separates various sections of the site, tall exterior flood lights, internal paved roadways and parking areas, security watch towers, and an aboveground water tank. The

temporary presence of construction-related equipment would not significantly alter or block the views of scenic resources.

Sutton-18

As stated in Section 15126.4(b) of the State CEQA Guidelines, mitigation measures (MMs) may specify performance standards that would mitigate the significant effect of the project and that may be accomplished in more than one specified way. There are many ways to design exterior lighting to avoid spillover, including adjustments to heights, angles, wattage, filters, and other elements. As such, MM AES-1 includes the performance standard of requiring that properties with sensitive receptors not be significantly adversely affected by light spillover onto properties with sensitive receptors, while also ensuring that lighting levels meet the security requirements for the MLWDC. Compliance with this standard through the provision of a Lighting Plan is subject to the review and approval of the Los Angeles County Director of Public Works prior to the commencement of any on-site or off-site demolition/construction activities.

Sutton-19

This comment alleges a failure to address the long-term impact of Valley Fever to on-site inmates and individuals living and working in the Project area. Coccidioidomycosis, also known as Valley Fever, and its impact on potential future inmates and County staff is discussed in Section 4.2, Air Quality. A summary of hazards associated with the fungus is provided in the Draft EIR, as well as summaries of trends related to Valley Fever in Los Angeles County, as inventoried and reported by the Los Angeles County Department of Public Health (LACDPH), which was consulted during the preparation of the Draft EIR.

The commenter references *The Changing Epidemiology of Coccidioidomycosis in Los Angeles (LA) County, California 1973–2011*, prepared by Ramon Guevara, Tasneem Motala, and Dawn Terashita of the LACDPH. Dr. Terashita has coordinated consulted with the County staff on the issue of Valley Fever during preparation of this EIR. This reference has been reviewed and it provides an analysis of the incidence rate of Valley Fever in Los Angeles County, including discussion of the Antelope Valley, and displays the trend of increasing cases through 2011. This information is augmented in the Section 4.2, Air Quality, with more recent data, as published in the LACDPH *2013 Annual Morbidity Report*. Information presented in the referenced report is consistent with information provided in the Draft EIR.

The Draft EIR includes an analysis of exposure hazards due to fugitive dust that may result from construction-related earth-moving activities. PDF AIR-1, which will be included in the Contractor's Specification and monitored through the MMRP, requires the distribution of materials on Valley Fever, or any updated materials as applicable, to worksite supervisors and construction workers. PDF AIR-2 and RR AIR-1, which will be included in the Contractor's Specification and monitored through the MMRP, requires compliance with Best Management Practices and AVAQMD Rule 403 for the prevention of fugitive dust and nuisance air contaminants. RR AIR-1 provides a listing of the most applicable AVAQMD Rules. Rule 403, Fugitive Dust, requires measures such as watering and control of track-out from the site, as well as submittal of a Dust Control Plan prior to the start of construction. Rule 403 requires control of fugitive dust and avoidance of nuisance, and Rule 402 prohibits the emission of quantities of air contaminants that could cause injury, detriment, nuisance, or annoyance to the public, or that endanger the comfort, repose, health or safety of the public. With implementation of RR AIR-1, on-site earth-moving activities would not result in fugitive dust that could affect adjacent off-site land uses.

As stated in RR AIR-2, the Project will be constructed in compliance with the Department of Health – Infection Control Policy Guidelines Procedure No. 918.01. Policy 918 is intended to prevent the spread of diseases that may be caused by construction-induced airborne pollution in susceptible individuals (patients, staff, and the public) in Department of Health Services (DHS) facilities. The protocols and requirements mandate the designation of an Infection Control Coordinator who must review and approve infection-control plans for new construction or renovation projects to ensure a safe environment. These infection-control plans must include infection-control measures to contain dust, debris, and other elements and protect the patients, employees, and visitors in this environment. The Infection Control Coordinator has independent authority to stop construction-related activities immediately when the public may be adversely affected by infection-control hazards generated during construction-related activities and the infection-control precautions and/or engineering controls are inadequate to contain the hazard. As such, the Draft EIR states that exposure to Valley Fever during construction activities would be the same as exposure to dust, and, thus, should follow the requirements for the mitigation of dust. Impacts would be less than significant, and no mitigation is required.

Section 4.2, Air Quality, acknowledges that the future inmate population has the potential to be exposed to dust generated from soils within the Antelope Valley, which have the potential to contain *Coccidioides* spores (i.e., the fungus that causes Valley Fever). As discussed in Section 3.0, Project Description, of the Draft EIR, according to the Sheriff's Department, AB 109 female inmates are serving an average of 423 days in custody from date of sentencing to date of release, while non-AB 109 female inmates serve an average of 107 days in custody. Therefore, the length of time that inmates would be living at the MLWDC is temporary, and is not equivalent to a permanent living circumstance or the longer sentences in state prisons that house higher-security inmates.

The Draft EIR summarizes the LACDPH 2013 *Annual Morbidity Report*, which presents the recent trends related to Valley Fever in Los Angeles County, including and increasing incidence rate for reported coccidioidomycosis cases within the last ten years. However, the overall incidence rate in the Antelope Valley was not determined to warrant changes in the County's protocol for disease prevention, notwithstanding the fact that the County health and public health officials are well educated on the condition; are familiar with its incidence in the County and elsewhere in the state; and are involved in research and education on the subject of Valley Fever.

The LACDPH has not identified the previous U.S. Immigration and Customs Enforcement (ICE) detainee population at the MLDC, the future inmate population at MLWDC, or earlier occupants at the High Desert Health System (HDHS) Multi-Ambulatory Care Center (MACC) (the adjacent hospital facility, which has relocated in Lancaster) as requiring the implementation of health screening protocols or other measures to address potential Valley Fever exposure.

Also, as demonstrated in Section 4.2, Air Quality, the California Department of Corrections and Rehabilitation (CDCR) has not identified the Lancaster area as being a geographic location that requires screening or interventions for the State prison population with regard to exposure to Valley Fever (CDCR 2013). As discussed with the Sheriff's Department staff for the preparation of the Draft EIR, the operation of the MLWDC will follow standard Sheriff's Department procedures for medical care and prevention with regard to health care for inmates in general, and Valley Fever specifically, and the Sheriff's Department will continue to coordinate with LACDPH (Masis 2015). The LACDPH is the designated County agency with the mandate to protect health, prevent disease, and promote the health and well-being of all persons within Los Angeles County. As such, any future changes in LACDPH policies that may be made regarding Valley Fever for inmate populations will be implemented, as applicable, throughout the County jail system.

Because the future inmate population's exposure to disturbed soils would be limited to gardening activities, PDF AIR-3 in Section 4.2, Air Quality, states that the Project will import gardening soils from outside of the Antelope Valley and would be used in raised planting beds to remove gardening in native soil as a potential source of exposure to Valley Fever spores. Further, outdoor recreational areas would be covered with landscaping, turf grass, gravel, or landscaping/wood chip ground cover that would minimize the opportunity for soils to become airborne.

The Antelope Valley has not been identified by the LACDPH, the AVAQMD, or any other governmental health agency as a region that should be avoided by the elderly, women, children, health-compromised individuals, or by any specific ethnic groups. The Antelope Valley includes the major population centers of the cities of Lancaster and Palmdale, which have an estimated 2014 combined population of approximately 314,902 people. This portion of the Antelope Valley includes a diverse population of residents that includes many individuals that could be considered to be at higher risk of complications due to infection from Valley Fever spores. As stated in Section 4.2, Air Quality, persons at the highest risk of developing disseminated Valley Fever include the very young (under 1 year old); adults over 60 years; immunocompromised individuals; people with diabetes; women in the third trimester of pregnancy; and certain ethnic groups, including African-Americans and Filipinos.

The demographics of the two cities include approximately 158,605 females (50.4 percent) and 156,297 males (49.6 percent) with a median age of approximately 30.7 years old. The racial/ethnic composition of the area is approximately 47 percent Latino, 29 percent white, 17 percent African American, and 4 percent Asian (U.S. Census Bureau 2016). As such, the temporary presence of a female inmate population into the Antelope Valley would not introduce a new or unusual demographic into the area that is not already present in the existing population of the region.

The MLWDC property is not located in an area determined to be hazardous to the health of local residents or visitors to the region. The Draft EIR concludes that the potential future inmate population's temporary placement into the Antelope Valley, which includes the inmates' participation in all indoor and outdoor activities at the MLWDC, would not constitute placement into a hazardous existing environmental setting that would require mitigation. Additionally, the operation of the proposed Project would not increase the prevalence of Valley Fever spores or otherwise exacerbate an existing environmental condition.

The commenter requests that the County consult with Fugitive Dust and Health and Valley Fever Scoping Group in Antelope Valley. The LACDPH representatives participate in various community focus groups including the Fugitive Dust Group, California Cocci Collaborative, and Centers for Disease Control's (CDC's) Cocci Public Health Working Group in order to stay abreast of current information and resources surrounding the condition.

Sutton-20

The commenter states that there is a "hot spot" of Valley Fever near the Project site, but no source information is provided. Section 4.2, Air Quality includes an overview of the LACDPH *2013 Annual Morbidity Report*. Data included in this report show the incidence in Valley Fever in Service Planning Area (SPA) 1 (i.e., Antelope Valley) from 2009 to 2013. The number of incidents of Valley Fever infection spiked in 2011 in SPA 1 with 93 reported cases, which represented 30 percent of cases in Los Angeles County, with an incidence rate of 25 per 100,000 people. The incidence rate decreased to 74 reported cases in both 2012 and 2013. As such, in 2013, SPA 1 represented approximately 20.4 percent of the total reported cases in Los Angeles County, with

an incidence rate of 19 per 100,000 people. SPA 1 has the highest infection rate in Los Angeles County, which is presumed to relate to the “hot spot” referred to in the comment (LACDPH 2013).

However, the rate of Valley Fever infection in Los Angeles County, and the Antelope Valley specifically, is substantially less than in neighboring Kern County, which had a 2013 infection rate of 276 per 100,000 people in the north valley region (KCPHSD 2016). The eastern portion of San Luis Obispo County had Valley Fever infection rates ranging from 205 to 257 per 100,000 people between 2007 and 2012 (SLOCPHD 2014). Therefore, although the Antelope Valley has the highest rates in Los Angeles County, the rates are well below rates found nearby counties where Valley Fever is endemic.

According to the Centers for Disease Control, California has areas that are categorized as “highly endemic”, “established endemic”, and “suspected endemic” for coccidioidomycosis. Los Angeles County as a whole is categorized as being “suspected endemic,” which is the same category ascribed to large areas of Nevada, New Mexico, and western Texas (CDC 2016). Highly endemic areas include Kern County and southern Arizona, including the metropolitan areas of Phoenix and Tucson. As presented in Sutton-19 above, the CDCR has not identified the Lancaster area as being a geographic location that requires screening or interventions for the State prison population with regard to exposure to Valley Fever (CDCR 2013).

Sutton-21

The possibility of future inmates potentially contracting Valley Fever is not dismissed as alleged, as Section 4.2, Air Quality, acknowledges that the future inmate population has the potential to be exposed to dust generated from soils within the Antelope Valley, which have the potential to contain *Coccidioides* spores. Additionally, Section 4.2, Air Quality, acknowledges that the Project site is located adjacent to land on the east that has exposed native soils (i.e., a two megawatt [MW] solar array), and is situated in the context of many acres of undeveloped land and fallow farmland that could generate airborne dust during windstorms. However, the Draft EIR concludes that the potential future inmate population’s temporary placement into the Antelope Valley, which includes the inmates’ participation in all indoor and outdoor activities at the MLWDC, would not constitute placement into a hazardous existing environmental setting that would require mitigation.

Sutton-22

As discussed with the Sheriff’s Department staff for the preparation of the Draft EIR, the operation of the MLWDC will follow standard Sheriff’s Department procedures for medical care and prevention with regard to health care for inmates in general, and Valley Fever specifically, and the Sheriff’s Department will continue to coordinate with LACDPH (Masis 2015). The LACDPH is the designated County agency with the mandate to protect health, prevent disease, and promote the health and well-being of all persons within Los Angeles County. In fact, *The Changing Epidemiology of Coccidioidomycosis in Los Angeles (LA) County, California 1973–2011*, which is referred to in the Sutton comment letter, was co-authored by Ramon Guevara, Tasneem Motala, and Dawn Terashita of the LACDPH. The LACDPH is highly aware of Valley Fever and monitors reports of any cases of the disease. As such, any future changes in LACDPH policies that may be made regarding Valley Fever for inmate populations will be implemented, as applicable, throughout the County jail system.

Sutton-23

The commenter's assertion that emissions from service/delivery trucks are not included in the Draft EIR analysis is incorrect. As stated in the footnotes to Table 6-1, Project Trip Generation, of the Traffic Impact Study, Appendix H of the EIR, "The site specific daily trip generation was derived based on detailed site programming information (employee numbers and shifts, miscellaneous delivery trucks, and inmate transport vehicles) as provided by County staff" (LLG 2015). Employee trips were estimated at 922 daily trips (461 round-trips); inmate transport trips were estimated at 16 daily trips (8 round-trips); and other miscellaneous trips were estimated at 100 daily trips (50 round-trips).

Laundry will be delivered to the site 3 times a week, with the actual laundering done remotely at another County facility. The Project will also receive food deliveries daily during the work week. Commissary delivery will occur once a week. These deliveries are accounted for in the estimated 100 daily service vehicle trips used in the Traffic Impact Study.

The trip generation is summarized in Section 4.13, Transportation and Traffic, which states the trip generation data includes "all trip types (i.e., staff and employees, service, and inmate visitation trips)". The calculation of mobile source input for trip generation was taken from the Project's Traffic Impact Study. Section 4.2, Air Quality, presents the results of the emission analysis using California Emissions Estimator Model (CalEEMod) Version 2013.2.2, which is a computer program that is used to calculate anticipated emissions associated with land development projects in California. Operational inputs include the year of analysis and vehicle trip generation rates. Output operational emissions data categories include area, energy, and mobile sources. Area sources are landscape maintenance equipment, consumer products, and architectural coatings used for routine maintenance. Energy emissions are from natural gas consumption. Mobile sources are the vehicles used by staff, visitors, and vendors, and include buses used for inmate transport.

Therefore, the Project's trip generation, which includes 100 daily trips for service vehicles, was included as an input into the CalEEMod air quality analysis. As shown in Table 4.2-7 of Section 4.2, Air Quality, the estimated annual operational emissions due to Project-related operations would not exceed the AVAQMD's CEQA significance thresholds and potential impacts would be less than significant. In fact, emissions were well below the thresholds of significance. For example, carbon monoxide (CO) was the air contaminant with the highest annual rate of emission, and the Project was estimated to emit 18 tons per year, while the AVAQMD threshold of significance is 100 tons per year.

As described in the Project Traffic Impact Study, it is anticipated that the relocation of inmates to the MLWDC would result in additional vehicle miles traveled (VMT) by visitors on weekends and holidays, inmate buses, and by service/delivery trucks seven days per week when compared to the length of trips required for the CRDF located in the City of Lynwood. The worst-case estimate is an increase of 2,500 VMT on a weekday and 25,700 VMT on a weekend day or holiday. To account for the increased VMT, CalEEMod default trip distances were adjusted to add approximately 3.26 million annual VMT to the VMT generated with default trip distances.

Sutton-24

The commenter's concern with use of the "air quality plan" is unclear. The use of that term in Section 4.2, Air Quality, is derived from Threshold 4.2a of Appendix G of the State CEQA Guidelines, which states "A project would result in a significant adverse impact related to Air Quality if it would conflict with or obstruct implementation of the applicable air quality plan". As

stated in Section 4.2.2, Existing Conditions, of Section 4.2, Air Quality, areas that are in nonattainment are required to prepare air quality plans and to implement measures that will bring the region into attainment. When an area has been reclassified from nonattainment to attainment for a federal standard, the status is identified as “maintenance”, and there must be a plan and measures established that will keep the region in attainment for the following ten years. For the reasons detailed on page 4.2-14 under Threshold 4.2a, the air quality plans applicable to the Project site are the *AVAQMD 2004 Ozone Attainment Plan (State and Federal)* and the *AVAQMD Federal 8-Hour Ozone Attainment Plan (Western Mojave Desert Non-attainment Area)*.

Sutton-25

Outdoor recreation, both active (e.g., use of sports courts, running track) and passive (e.g., sitting in courtyards or on turf grass areas), will occur on the Project site. The outdoor recreation opportunities and amenities are one of the benefits of the proposed MLWDC Project when compared to existing facilities at the CRDF. There are no known reasons to believe that risks of infection from Valley Fever from participating in outdoor recreational activities at the MLWDC site would be any different from the risks of participating in outdoor activities elsewhere in the Lancaster portion of the Antelope Valley.

Because the future inmate population's exposure to disturbed soils would be limited to gardening activities, PDF AIR-3 in Section 4.2, Air Quality, states that the Project will import gardening soils from outside the Antelope Valley and would be used in raised planting beds to remove gardening in native soil as a potential source of exposure to Valley Fever spores. Vendors for garden soil are numerous and a specific provider has not been determined at this time; however, as required by PDF AIR-3, only imported gardening soil will be used at the Project site. Further, outdoor recreational areas would be covered with landscaping, turf grass, gravel or landscaping/wood chip ground cover that would minimize the opportunity for soils to become airborne.

Sutton-26

There have been no tests conducted on the Project site to measure for Valley Fever spores within on-site soils. According to the Centers for Disease Control, testing soil for *Coccidioides* is not likely to be useful because the fungus is thought to be common in the soil in certain areas. A soil sample that tests positive for *Coccidioides* does not necessarily mean that the soil will release the fungus into the air and cause infection. Also, there are no commercially-available tests to detect *Coccidioides* in soil. Testing soil for *Coccidioides* is currently only done for scientific research (CDC 2016).

The majority of the Project site will be paved or landscaped, and exposure to disturbed soils would be minimized through PDF AIR-3. Section 4.2, Air Quality acknowledges that the future inmate population has the potential to be exposed to dust generated from soils within the Antelope Valley, which have the potential to contain *Coccidioides* spores. Additionally, Section 4.2, Air Quality, acknowledges that the Project site is located adjacent to land on the east that has exposed native soils (i.e., a two-MW solar array), and is situated in the context of many acres of undeveloped land and fallow farmland that could generate airborne dust during windstorms. However, the Draft EIR concludes that the potential future inmate population's temporary placement into the Antelope Valley, which includes the inmates' participation in all indoor and outdoor activities at the MLWDC, would not constitute placement into a hazardous existing environmental setting that would require mitigation.

Sutton-27

Section 4.2, Air Quality, analyzes the potential for pollutant emissions during demolition, construction, and operation of the Project. Impacts were determined to be less than significant, with compliance with regulatory requirements (RRs) and the implementation of Project Design Features (PDFs). As stated in Response Sutton-25, there are no known reasons to believe that risks of infection from Valley Fever from participating in outdoor recreational activities at the MLWDC site would be any different from the risks of participating in outdoor activities elsewhere in the Lancaster portion of the Antelope Valley.

Section 4.2, Air Quality, acknowledges that the future inmate population has the potential to be exposed to dust generated from soils within the Antelope Valley, which have the potential to contain *Coccidioides* spores. As discussed in Section 3.0, Project Description, of the Draft EIR, according to the Sheriff's Department, AB 109 female inmates are serving an average of 423 days in custody from date of sentencing to date of release, while non-AB 109 female inmates serve an average of 107 days in custody. Therefore, the length of time that inmates would be living at the MLWDC is temporary and is not equivalent to a permanent living circumstance or the longer sentences in state prisons that house higher-security inmates. The Draft EIR concludes that the potential future inmate population's temporary placement into the Antelope Valley, which includes the inmates' participation in all indoor and outdoor activities at the MLWDC, would not constitute placement into a hazardous existing environmental setting that would require mitigation.

Sutton-28

Section 4.3.2 of the Draft EIR sets forth a detailed description of the existing conditions relating to the plant and animal wildlife species that may be encountered on the Project site. A few examples of wildlife species expected to use the Project site include reptiles such as side-blotched lizard (*Uta stansburiana*) and western whiptail (*Aspidoscelis tigris*); bird species such as rock pigeon (*Columba livia*), house finch (*Haemorhous mexicanus*), European starling (*Sturnus vulgaris*), mourning dove (*Zenaida macroura*), and northern mockingbird (*Mimus polyglottos*); and mammals such as deer mouse (*Peromyscus maniculatus*), Botta's pocket gopher (*Thomomys bottae*), and desert cottontail (*Sylvilagus audubonii*).

Implementation of the proposed Project would have limited impact on habitat and/or movement of wildlife species due to limited wildlife use of the Project site. As stated in Section 4.3, Biological Resources, the site is highly developed with a lack of native habitats. The Project site is entirely contained by a perimeter fence that does not allow for passage into or out of the MLDC except within secured gated areas. Therefore, the Project site does not represent an important regional movement corridor, and few wildlife species are expected to use the site. Extremely limited local movement of common wildlife species through unfenced parking areas or landscaped areas of the site may occur for foraging and dispersal. The Project's short-term and long-term construction impacts would not have an impact on regional wildlife movement. Furthermore, the wildlife expected to use the site is expected to be highly adapted to human disturbance. Construction and ground-disturbing activities would not significantly impact habitat because there is extensive (non-specialized) habitat for these common species throughout the Project site.

Sutton-29

As stated in Section 4.3, Biological Resources, essentially all naturally occurring bird species (such as house finch) in North America are considered to be migratory and included on the list of species protected under the Migratory Bird Treaty Act (MBTA). Suitable nesting habitat for common migratory birds is present in mature trees and other structures on the Project site and in

its adjacent areas and could be adversely impacted either directly or indirectly during the Project's short-term construction impacts. Activities such as vegetation removal and structure demolition could potentially cause nest failure during the breeding season. Implementation of MM BIO-2, which requires nesting bird surveys and construction buffer zones for construction activities occurring during the breeding season, would reduce potential direct and indirect impacts on nesting migratory birds.

The majority of bird species expected to use the Project site can be found year round and do not migrate long distances. Bird species expected to occur such as the European starling, mourning dove, and house finch exhibit either differential or partial migration. In differential migration, migration is related to a bird's age and sex, and some birds do not travel at all but remain in the same general location year round. Partial migration is when some birds (independent of age/sex) migrate, while other birds do not travel at all. MM BIO-2, which requires nesting bird surveys and construction buffer zones for construction activities occurring during the breeding season, is proposed mitigation for protecting nesting migrating birds.

Generally speaking, construction will continue unhindered by particular seasons during the calendar year. In some cases, and when feasible, particular construction activities with high potential for breeding bird impacts (such as vegetation removal) may be scheduled during the non-breeding season. If avoidance of particular construction activities during the breeding season is not feasible, MM BIO-2 would be implemented. The duration of construction activities does not have an effect on implementation of MM BIO-2. As generally summarized below, MM BIO-2 requires that protective procedures are implemented if construction is scheduled to occur during the bird nesting season:

- To the extent feasible, vegetation/tree removal shall occur during the non-breeding season for nesting birds (generally late September to early March) and nesting raptors (generally early July to late January) to avoid impacts to nesting birds and raptors. If the nature of the Project requires that work be initiated during the breeding season for nesting birds and raptors (February 1 to August 31), a pre-construction survey shall be conducted by a qualified Biologist. If the Biologist does not find any active nests within or immediately adjacent to the impact area, the vegetation clearing/construction work shall be allowed to proceed.
- If the Biologist finds an active nest within or immediately adjacent to the construction area and determines that the nest may be impacted or breeding activities substantially disrupted, the Biologist shall delineate an appropriate buffer zone around the nest and the active nest shall be protected until nesting activity has ended. Encroachment into the buffer area around a known nest shall only be allowed if the Biologist determines that the proposed activity would not disturb the nest occupants. Construction will be allowed to proceed when the qualified Biologist has determined that fledglings have left the nest or the nest has failed.

MM BIO-2 will be implemented by the qualified Biologist hired by the County or its contractor prior to the start of construction. As stated in MM BIO-2, a letter report shall be prepared and submitted to the Los Angeles County Department of Public Works to document the survey findings and recommended protective measures.

Sutton-30

Potential impacts to bat maternity roosts are analyzed under Threshold 4.3d in the Draft EIR. Construction activities on the Project site are anticipated to begin in December 2016 for a duration of 35 months. MM BIO-1 prohibits removal of trees supporting bat maternity roost sites (where

bats give birth and nurse their young) during bat maternity roost season (March 1 to July 31). However, the demolition of bat maternity roosts, if present on the Project site, would indirectly impede the use of wildlife nursery sites, as the colony would not be able to return to their nursery site. However, there is low potential for bat maternity roosts on the Project site due to limited suitable habitat, the presence of human activity on the site, and a lack of open water. A potential bat maternity roost location on the Project site being removed after the maternity season would not be considered a substantial impediment to the use of native wildlife nursery sites due to the relatively low population such roost would support in relation to the larger regional bat population.

Bat maternity roosts of any bat species may be considered native wildlife nursery sites. Common bat species, such as California myotis, form maternity colonies in places such as crevices of old snags, crevices of trees, bridges, and buildings. Impacts to multiple such active breeding colonies during the breeding season could potentially cause a decline in regional population. MM BIO-1 calls for calls for pre-construction bat surveys and bat exclusion procedures. There is low potential for bat maternity roosts, colonial roosts, and solitary roost sites on the Project site due to limited suitable habitat, the presence of human activity on the site, and a lack of open water. Potential colonial, solitary, and maternity roost being removed from the Project site would not be considered a substantial ecological impact due to the relatively low population such roosts would support in relation to the larger regional bat population.

Sutton-31

This comment alleges that MM BIO-1 is not appropriate or effective. The portion of MM BIO-1 related to bats is intended to avoid direct impacts to maternity roosts during the breeding season. The purpose of said avoidance is to reduce potentially significant impacts to native wildlife nursery sites (bat maternity roosts) to levels considered less than significant. MM BIO-1 effectively avoids the impact of removing occupied bat maternity roosts by calling for a pre-construction bat habitat assessment of the trees and/or structures marked for potential removal/demolition prior to commencement of construction activities. If potential maternity roosts are detected during the bat habitat assessment, construction activities will not occur until the bat maternity season has ended.

Sutton-32

The implementation of MM BIO-1 would occur immediately prior to Project construction activities. Therefore, surveys would not be conducted or completed during the timeframe of the Final EIR, which must be provided to the Board of Supervisors for review and consideration prior to any decision to approve, revise, or deny the Project. As required in MM BIO-1 and MM BIO-2, only qualified biologists shall be retained to conduct the required surveys and/or assessments. County studies and reports such as the ones required by the Draft EIR would be available for public review in accordance with the California Public Records Act (CPRA), which requires that governmental records be disclosed to the public upon request, unless there is a specific reason not to do so, in accordance with exemptions within the CPRA or other state laws.

Sutton-33

MM BIO-2 requires the establishment of "an appropriate buffer zone" around an active nest, if found. An appropriate buffer zone is an area surrounding an active nest where no Project-related activities may occur. The zone is determined by a qualified Biologist who is familiar with the behavior of the birds tending to the nest. The buffer zone is specific to each particular nest and may vary from site to site depending on the construction activity, the height of the nest in a tree or other structure, and the species of nesting bird, among other factors. An appropriate buffer zone is one that avoids a nest failure (through direct or indirect impacts) due to construction

activities. We are unaware of a standard buffer size determined by the American Institute of Biological Sciences. The methodology set forth in MM BIO-2 is consistent with the requirements set forth for other development Projects throughout Los Angeles County that require compliance with the MBTA, which are regularly vetted through the California Department of Fish and Wildlife (CDFW) review of CEQA environmental documents.

Sutton-34

The Draft EIR relied upon a thorough search of the Vertebrate Paleontology records conducted by the Natural History Museum of Los Angeles County (NHMLAC), as documented in a letter dated June 6, 2010, and located in Appendix C-2 of the Draft EIR. As stated, the surficial deposits in the Project area are “composed exclusively of younger Quaternary Alluvium beneath soil. These types of sedimentary deposits usually do not contain significant vertebrate fossils, at least in the uppermost layers” (McLeod 2010) The NHMLAC letter goes on to state that surface grading or shallow excavations in the proposed Project area are unlikely to encounter significant vertebrate fossils in the younger Quaternary Alluvium, while deeper excavations into older deposits could uncover significant fossil vertebrate remains (McLeod 2010).

Sedimentary deposits and formations do not change over the course of five years and, even if fossils were discovered in the Project area, MM CUL-2 in the Draft EIR would remain unchanged. MM CUL-2 requires that a qualified Paleontologist be notified and retained when earth-moving activities are anticipated to impact undisturbed deposits in the older Quaternary alluvium on the Project site (i.e., approximately five feet below ground surface or deeper). The Paleontologist shall determine, based on consultation with the County, when monitoring of grading activities is needed based on the on-site soils and final grading plans. If any fossil remains are discovered, the Paleontologist must prepare a report of the results of any findings, which would be submitted to the NHMLAC that would then update its own records and maps accordingly.

An updated records search was requested and received from the NHMLAC and their response is provided in Appendix B to this document. The only difference between the new 2016 records search and the 2010 records search is that additional fossil species have been found in the vicinity of the Project site. The camel fossil that is mentioned in the letter was found at the County's High Desert Regional Health Center (located approximately 5.5 miles east of the Project site) (McLeod 2016). However, the recommendations in the NHMLAC letter are the same as in the prior records search, and MM CUL-2 reflects the NHMLAC's recommendation. No change to the Draft EIR analysis or MM CUL-2 is required.

Sutton-35

As stated on page 4.4-11 of the Draft EIR, an inquiry was made on January 30, 2014, of the Native American Heritage Commission (NAHC) to request a review of the Sacred Lands File database regarding the possibility of Native American cultural resources and/or sacred places in the Project vicinity that are not documented in other databases. The NAHC responded on January 31, 2014, and indicated that there are not records of Native American traditional cultural places with the NAHC, but the NAHC provided a list of Native American groups and individuals who may have knowledge regarding Native American cultural resources not formally listed on any database. Subsequently, letters to Native American tribes were sent out on February 3, 2014. Beverly Folkes was sent a letter on February 3, 2014, using the address provided by the NAHC (see Appendix C-3 of the Draft EIR). Only Daniel McCarthy of San Manuel Band of Mission Indians responded via email on February 6, 2014, and stated that, given the nature and location of the Project, the San Manuel Band has no concerns (McCarthy 2014). See Appendix C of this Final EIR. No follow-up on the other tribes was made as the documentation relies on the contact

information from the NAHC as the authoritative source and it is common not to receive responses from all the tribes contacted.

The Project does not require a General Plan Amendment or Specific Plan Amendment and thus, is not subject to the Native American consultation under Senate Bill (SB) 18. The Notice of Preparation (NOP) for the Project was also sent out prior to the effective date of Assembly Bill (AB) 52, which provides a separate consultation process that can be triggered by a tribe and applies only to projects for which the NOP scoping notice was sent on or after July 1, 2015. Thus, the County is not specifically required to notify Native American tribes under CEQA. However, information letters were sent to local tribes as part of the background research for the Project site.

It cannot be entirely discounted that archaeological resources may be present beneath the pavement, buildings, or ground surfaces. Thus, MM CUL-1 calls for a qualified Archaeologist to be retained by the County to attend the pre-grading meeting with the Construction Contractor to establish, based on the site plans, appropriate procedures for monitoring earth-moving activities during construction. The Archaeologist would determine, based on consultation with the County, when monitoring of grading activities is needed. Monitoring should observe disturbance of the uppermost layers of sediment (soils and younger Quaternary alluvium) and any archaeological resources discovered shall be salvaged and catalogued, as necessary.

Sutton-36

The comment alleges that not all contributing buildings to the Historic District have been identified. Section 4.4, Cultural Resources, includes a summary of the findings of the Historical Resources Report included in Appendix C-1 of the Draft EIR. The Report concludes that there is a historic district within the Project study area. The district, named the Polaris Flight Academy Historic District, meets the criteria for listing in the National Register of Historic Places (NRHP) and the California Register of Historical Resources (CRHR) for its direct associations with military aviation during World War II and the work of Major Corliss Champion Moseley (GPA 2015). It is therefore considered a historical resource subject to the requirements of CEQA.

It is recognized as standard methodology to evaluate groupings of buildings, structures, objects, and landscape features within a distinct geographic area with shared historic contexts as potential historic districts. One key factor in determining contributing and non-contributing resources is period of significance. Buildings constructed outside the period of significance cannot be considered contributors. Because the Historic District, in this case, is significant for its World War II history, its period of significance within this context ended in 1945. Thus, the buildings constructed after 1945 are not contributors. They were constructed for different uses by different entities.

It would have been appropriate to evaluate the three buildings (i.e., Old Lock Building, Quonset Hut, and Wooden Shed) in question individually, above and beyond their evaluations as contributors, if they had any potential to represent an important historic context as individual buildings. The contextual research into the postwar history of the property when it was used by the State and the County as a detention facility indicated no reason to conclude that the property had any other significance than its World War II significance. As a result, there is no significant historic context for the three buildings to potentially represent. The resulting evaluation would reach exactly the same conclusion: the buildings would be assigned a 6Z classification, not eligible for designation.

Furthermore, there were no buildings between the two large historic hangars during the property's period of significance, so removing the three non-contributing buildings will actually be beneficial

to the ratio of contributors to non-contributors in the Historic District. Project implementation will not have a significant impact on the Historic District, and no further analysis is required.

Sutton-37

Implementation of MM CUL-2 would occur immediately prior to, and during, Project construction activities. The qualified Paleontologist would be hired by the County or its contractor prior to the start of construction. Therefore, monitoring would not be conducted or completed during the timeframe of the Final EIR, which must be provided to the Board of Supervisors for review and consideration prior to any decision to approve, revise, or deny the Project. A plan for the evaluation, recordation, recovery and/or salvage of any discovered fossil remains would be formulated by the Paleontologist at the time of the discovery based on the circumstances of the find. County studies and reports such as the ones required by the Draft EIR would be available for public review in accordance with the CPRA, which requires that governmental records be disclosed to the public upon request, unless there is a specific reason not to do so, in accordance with exemptions within the CPRA or other state laws.

Sutton-38

The Draft EIR includes an analysis of exposure hazards due to fugitive dust that may result from construction-related earth-moving activities. PDF AIR-1, which will be included in the Contractor's Specification and monitored through the MMRP, requires the distribution of materials on Valley Fever, or any updated materials as applicable, to worksite supervisors and construction workers. PDF AIR-2 and RR AIR-1, which will be included in the Contractor's Specification and monitored through the MMRP, requires compliance with Best Management Practices and AVAQMD Rule 403 for the prevention of fugitive dust and nuisance air contaminants. RR AIR-1 provides a listing of the most applicable AVAQMD Rules. Rule 403, Fugitive Dust, requires measures such as watering and control of track-out from the site, as well as submittal of a Dust Control Plan prior to the start of construction. Rule 403 requires control of fugitive dust and avoidance of nuisance, and Rule 402 prohibits the emission of quantities of air contaminants that could cause injury, detriment, nuisance, or annoyance to the public, or that endanger the comfort, repose, health, or safety of the public. With implementation of RR AIR-1, on-site earth-moving activities would not result in fugitive dust that could affect adjacent off-site land uses.

As stated in RR AIR-2, the Project will be constructed in compliance with the Department of Health – Infection Control Policy Guidelines Procedure No. 918.01. Policy 918 is intended to prevent the spread of diseases that may be caused by construction-induced airborne pollution in susceptible individuals (patients, staff, and the public) in Department of Health Services (DHS) facilities. The protocols and requirements mandate the designation of an Infection Control Coordinator who must review and approve infection-control plans for new construction or renovation projects to ensure a safe environment. These infection-control plans must include infection-control measures to contain dust, debris, and other elements and to protect the patients, employees, and visitors in this environment. The Infection Control Coordinator has independent authority to stop construction-related activity immediately when the public may be adversely affected by infection-control hazards generated during construction-related activities and when the infection-control precautions and/or engineering controls are inadequate to contain the hazard. As such, the Draft EIR states that exposure to Valley Fever during construction activities would be the same as exposure to dust, and, thus, should follow the requirements for the mitigation of dust. Impacts would be less than significant, and no mitigation is required.

Sutton-39

This comment alleges that MM CUL-1 and MM CUL-2 are not sufficient. MMs are set forth in the Draft EIR as required activities that must occur in order to reduce potentially significant environmental impacts. No required pre-construction activities would occur or be contracted for, until the Board of Supervisors has made a determination to approve the Project. Should the Board of Supervisors decide to modify the Project, then the MMs set forth in the Draft EIR may require changes. Should the Board of Supervisors decide to deny the Project, then there would be no need to continue with requirements set forth in the MMs.

The Project site survey that was completed for on-site archaeological resources is discussed in Section 4.4, Cultural Resources, under Thresholds 4.4b and 4.4c. BonTerra Psomas' archaeologist Patrick Maxon, M.A., RPA, completed a pedestrian survey of the Project site on November 21, 2013. He walked all accessible open areas of the site to determine if there were exposed archaeological resources. No archaeological resources were expected as the site is largely developed with buildings, sidewalks, parking areas, roads, and other paved areas. The findings of his site survey, along with the conclusions of the Vertebrate Paleontology records conducted by the NHMLAC (see Appendix C-2 of the Draft EIR), are incorporated into the analyses under Thresholds 4.4b and 4.4c in Section 4.4, Cultural Resources.

Section 21081.6 of CEQA and Section 15097 of the State CEQA Guidelines require a public agency to adopt an MMRP for assessing and ensuring the implementation of required mitigation measures applied to proposed projects. Specific reporting and/or monitoring requirements that will be enforced during Project implementation shall be adopted simultaneously with final Project approval by the responsible lead agency.

Sutton-40

As stated in Section 4.5, Geology and Soils, liquefaction is the sudden decrease in the strength of cohesionless soils due to dynamic or cyclic shaking. Saturated soils behave temporarily as a viscous fluid (liquefaction) and, consequently, lose their capacity to support structures. The potential for liquefaction decreases with increasing clay and gravel content, but increases as the ground acceleration and duration of shaking increase. Liquefaction potential has been found to be greatest where both high groundwater and loose sands occur within 50 feet of the ground surface.

The *Geohazard Study Report* for the Project, as summarized in the Draft EIR, included a liquefaction analysis and indicates that the Project site may be susceptible to liquefaction (Converse 2014b). As such, proposed structures and infrastructure on the Project site may be exposed to liquefaction hazards, including damage to foundations; settlement of aboveground structures; and uplift of buried structures and infrastructure. Prior to the completion of final engineering design plans, additional geotechnical exploration, lab testing, and analysis may be required for planned seismic upgrades to existing buildings in order to provide detailed design recommendations. The Project's structural design, which must be completed in accordance with the recommendations of the geotechnical investigation and subject to the County Building Official, as included in RR GEO-1, would address liquefaction hazards to prevent damage to foundations, structures, and infrastructure.

Reductions in the groundwater levels are generally likely to decrease the potential for liquefaction because water would be farther from the ground surface. It is anticipated that the engineering design for the Project will account for liquefaction hazards based on soil testing that would be completed as part of RR GEO-1.

Sutton-41

As the commenter states, the Antelope Valley can be subject to periodic strong winds. High winds have the ability to transport dust and soil, which may or may not contain *Coccidioides* spores (i.e., the fungus that causes Valley Fever). The Draft EIR includes an analysis of potential exposure to fugitive dust that may result from construction-related earth-moving activities. PDF AIR-1, which will be included in the Contractor's Specification and monitored through the MMRP, requires the distribution of materials on Valley Fever, or any updated materials as applicable, to worksite supervisors and construction workers. PDF AIR-2 and RR AIR-1, which will be included in the Contractor's Specification and monitored through the MMRP, requires compliance with Best Management Practices and AVAQMD Rule 403 for the prevention of fugitive dust and nuisance air contaminants. RR AIR-1 provides a listing of the most applicable AVAQMD Rules. Rule 403, Fugitive Dust, requires measures such as watering and control of track-out from the site, as well as submittal of a Dust Control Plan prior to the start of construction. Rule 403 requires control of fugitive dust and avoidance of nuisance, and Rule 402 prohibits the emission of quantities of air contaminants that could cause injury, detriment, nuisance, or annoyance to the public, or that endanger the comfort, repose, health or safety of the public. With implementation of RR AIR-1, on-site earth-moving activities would not result in fugitive dust that could affect adjacent off-site land uses.

In a letter received from the Antelope Valley Air Quality Management District (AVAQMD), as included in Appendix B of this document, regarding this Project and included in the comment section of this Final EIR, the AVAQMD has concurred with the Draft EIR analysis of air quality and dust impacts.

Sutton-42

The groundwater level declines and associated land subsidence are not as severe near at the Project site as in other parts of the Antelope Valley groundwater basin. Local survey monument benchmark records would be reviewed to determine the amount of land subsidence on or near the Project site, as part of RR GEO-1. The design of the building foundations has not been determined, as the design phase is yet to occur. However, the foundation design for new buildings or additions will be designed and constructed to appropriately address current soil conditions and characteristics identified by a California licensed geologist, soils engineer, and structural engineer. The design will meet code requirements which include recognition of soil bearing pressure, seismic activity and jurisdictional building codes as well as AB 900 structural requirements. Existing facilities are monitored periodically for distress as part of facility operation and maintenance protocol, and there would be no hazards posed to the inmate or employee population.

Additionally, the Antelope Valley Groundwater Basin has been recently adjudicated through Los Angeles Superior Court case number 1-05-CV-049053: Antelope Valley Groundwater Cases, Consolidated Proceeding 4408, which determined the safe yield of groundwater extraction from the basin and allocates pumping rights accordingly to users. As such, improved water conservation measures, including recharge of reclaimed water, storm water and imported waters, and other measures in compliance with the adjudication could be expected to reduce water level declines and associated land subsidence in the region, and provided sustainable safe yields within the Antelope Valley groundwater basin.

Regarding operational costs associated with the proposed Project, the final design of the facility has not been drafted or approved, and the long-term operational costs have not yet been determined.

Sutton-43

The analysis of geologic, soils, and seismic characteristics and constraints on the Project site and surrounding area presented in Section 4.5, Geology and Soils, is based on the *Geohazard Study Report – Mira Loma Detention Center, 45100 North 60th Street West, Lancaster, California* prepared by Converse Consultants in June 2014, which has in fact been fully disclosed and included as Appendix D of the Draft EIR. The conclusions of significance findings in Section 4.5, Geology and Soils, are based on the substantial evidence presented in this technical study.

Sutton-44

While the Project's estimated water demand is less than the 250 acre-feet per year (afy) threshold established by the California Department of Water Resources (DWR) for determining whether a Water Supply Assessment (WSA) is required under Senate Bill (SB) 610, a WSA was prepared for the Project and is provided in Appendix G-2 of the Draft EIR. The WSA is also summarized in Section 4.14, Utilities and Service Systems. As required under SB 610, the WSA must include an evaluation of the sufficiency of the water supplies available to the water supplier to meet existing and anticipated future demands (including the demand associated with the project) over a 20-year horizon that includes normal, single-dry, and multiple-dry years. The multiple-dry year scenario would represent drought conditions.

The WSA for the Project indicates that the Los Angeles County Department of Public Works Waterworks District 40 (LACWWD 40) would be able to meet the projected water demands in its service area, along with the Project's demands, through the next 20 years, including normal, single-dry, and multiple-dry (5-year period) years. Future demand is projected to increase within the LACWWD 40 service area, and the reliability of the LACWWD 40's future water supplies to meet demand will be ensured through continued implementation of programs for water banking; purchase of new imported supplies; water transfers; water conservation; and expansion of recycled water systems (Psomas 2015).

Thus, the potential impacts of climate change on reduced water supplies due to drought conditions has been accounted for in the WSA for the Project. The WSA was reviewed by LACWWD 40 prior to inclusion in the Draft EIR.

Sutton-45

As stated in Section 4.6, Greenhouse Gas Emissions, of the Draft EIR, "materials to be imported to and exported from the site" are accounted for in the CalEEMod calculations for the Project. Although it is anticipated that "cut and fill would be balanced on site; no import or export of soils would occur", as stated on page 4.2-15 of the Draft EIR. The CalEEMod analysis presented in Section 4.2, Air Quality, and Section 4.6, Greenhouse Gas Emissions, conservatively includes 200 haul truck roundtrips during the Site Preparation phase to cover unanticipated and incidental export and import haul, such as imported soil for raised garden beds or for the removal of waste materials.

The Project would use water from wells that are on site during construction activities; there would be no imported water for construction use as stated on page 4.14-17 of Section 4.14, Utilities and Service Systems. However, the CalEEMod input specifies watering for construction dust control and assumes the use of water trucks in the emissions calculations. Additionally, the modeling assumes ten truck roundtrips per day during the Building Construction phase to cover the delivery of materials, and export of construction waste. Therefore, the analysis set forth in the Draft EIR includes a conservative analysis of truck trips and no additional analysis is required.

Sutton-46

The commenter's quoted text is a statement that describes the rationale for the South Coast Air Quality Management District's (SCAQMD's) construction emission amortization methodology. Section 4.6, Greenhouse Gas Emissions, utilizes the methodology set forth by the SCAQMD, which is also used by the AVAQMD. In essence, this statement means that construction equipment greenhouse gas (GHG) emission factors only change slowly with time, and therefore, there are limited ways to decrease emissions from construction equipment. The inventory of construction equipment to be used during each phase of this Project is included in Appendix B of the Draft EIR, as stated in Section 4.6, Greenhouse Gas Emissions. The construction equipment type, amount, usage hours per day, horsepower, and load factor are also included in Appendix B of the Draft EIR.

Sutton-47

The reference in Section 4.6, Greenhouse Gas Emissions, to construction activities beginning in November 2016 has been revised in Section 3.0, Clarifications to the Draft EIR, to reflect the anticipated December 2016 start date. The analysis throughout the Draft EIR is not materially affected by the start date of construction activities. The analysis of GHG emissions is not based on start/end dates because emissions are analyzed on an annual basis. Section 4.6.6, Impact Analysis, states the following:

It should be noted that the Design-Build contractor may request an expedited schedule to work on Saturdays and/or to increase the intensity of the daily construction operations through the use of more equipment/workers on-site than anticipated in the Project's proposed schedule (see Section 3.0, Project Description). This request would be considered for the purpose of reducing the duration of the Project construction period. The emissions modeling assumes a 5-day work week. If some or all construction would occur on a 6-day per week schedule and/or the schedule would be shortened by using more equipment, annual greenhouse gas emissions may increase for the years affected. Because the total Project effort would not change, there would be offsetting decreases later in the Project and the total greenhouse gas emissions would be the same, or approximately the same as shown in Table 4.6-2. The amortized Project emissions would not change.

No additional analysis is required.

Sutton-48

As stated in Section 4.6, Greenhouse Gas Emissions, "as originally proposed by the SCAQMD, it has become current practice (in most air districts) that construction emissions are amortized over a project lifetime (typically 30 years) so that GHG-reduction measures will address construction GHG emissions as part of the operational GHG reduction strategies (SCAQMD 2008; SMAQMD 2009)". The AVAQMD uses the SCAQMD construction emission amortization methodology. The AVAQMD threshold for significant GHG emissions of 100,000 tons (90,718 metric tons) is stated on page 4.6-12 of the Draft EIR. There are no separate thresholds for construction and operations. However, for comparison, the estimated emissions per year of construction are shown in Table 4.6-2 in Section 4.6, Greenhouse Gas Emissions. As shown, the Project's maximum annual construction GHG emissions in 2017 of 306 metric tons of carbon dioxide equivalent (MTCO_{2e}) are substantially less than the AVAQMD's 90,718 MTCO_{2e} threshold.

As shown in Table 4.6-4 of Section 4.6, Greenhouse Gas Emissions, with consideration of amortized construction emissions, the total annual estimated GHG emissions for the Project are 5,614 MTCO₂e/yr. This value is considerably less than the AVAQMD threshold of 90,718 MTCO₂e/yr. Therefore, the Project would result in less than significant GHG emissions and no mitigation is required.

Sutton-49

The total Project-related GHG emissions from construction activities are estimated based on the total work effort, whether that effort occurs during 5-day or 6-day work weeks. The “offsetting decreases” are not GHG reductions; they indicate that more work is done earlier in the schedule. The total work effort remains unchanged. Section 4.6.6, Impact Analysis states the following:

It should be noted that the Design-Build contractor may request an expedited schedule to work on Saturdays and/or to increase the intensity of the daily construction operations through the use of more equipment/workers on-site than anticipated in the Project's proposed schedule (see Section 3.0, Project Description). This request would be considered for the purpose of reducing the duration of the Project construction period. The emissions modeling assumes a 5-day work week. If some or all construction would occur on a 6-day per week schedule and/or the schedule would be shortened by using more equipment, annual greenhouse gas emissions may increase for the years affected. Because the total Project effort would not change, there would be offsetting decreases later in the Project and the total greenhouse gas emissions would be the same, or approximately the same as shown in Table 4.6-2. The amortized Project emissions would not change.

No additional analysis is required.

Sutton-50

The commenter's assertion that emissions from service/delivery trucks are not included in the Draft EIR analysis is incorrect. As stated in the footnotes to Table 6-1, Project Trip Generation, of the Traffic Impact Study, Appendix H of the EIR, “The site specific daily trip generation was derived based on detailed site programming information (employee numbers and shifts, miscellaneous delivery trucks, and inmate transport vehicles) as provided by County staff” (LLG 2015). Employee trips were estimated at 922 daily trips (461 round-trips); inmate transport trips were estimated at 16 daily trips (8 round-trips); and other miscellaneous trips were estimated at 100 daily trips (50 round-trips). The calculation of mobile source input for trip generation was taken from the Project's Traffic Impact Study and used as an input into CalEEMod, which is a computer program that is used to calculate anticipated emissions associated with land development projects in California. Therefore, the Project's trip generation, which includes 100 daily trips for service vehicles, was included as an input into the CalEEMod air quality and GHG analyses. No additional analysis is required.

Sutton-51

The operational annual emissions for each source area (i.e., area, energy, mobile, off-road, solid waste, water) were calculated using CalEEMod Version 2013.2.2. Estimates of energy use and solid waste were provided by the Los Angeles County Department of Public Works engineering staff. Additional details relative to the CalEEMod calculations may be found in Section 4.2, Air Quality, and in Appendix B of the Draft EIR. Operational emissions from the MLDC when it was

occupied by the Immigration and Customs Enforcement (ICE) were not analyzed because the program ended in 2012 and was not in operation at the time of the issuance of the Project's Notice of Preparation (NOP). The NOP was issued in September of 2014 which, according to Section 15125 of the State CEQA Guidelines, establishes the existing physical conditions on the Project site from both a local and regional perspective, and constitutes the baseline conditions by which a lead agency determines whether an impact is significant. As such, the GHG emissions from the previous uses at the Project site were not determined to be applicable for the Draft EIR.

Sutton-52

This comment offers no basis to support the statement that the analysis presented in Section 4.6, Greenhouse Gas Emissions, is inaccurate. As demonstrated through the responses for Sutton-45 through Sutton-51, the Draft EIR includes a conservative analysis of GHG emissions using the widely accepted CalEEMod methodology. We hope that a review of these responses to your comments and the information in the Draft EIR referenced will help to address your concerns. No additional analysis is required.

Sutton-53

As stated in RR GHG-4 in Section 4.6, Greenhouse Gas Emissions, "The Project will include an Employee Commute Reduction Plan (ECRP), commonly known as the Rideshare Plan, in accordance with Los Angeles County Code Chapter 5.9, Vehicle Trip Reduction. The ECRP will specify the measures to be implemented at MLWDC to achieve the target average vehicle ridership performance goal for employee vehicles subject to the Ordinance." Because reductions in GHG emissions from RR GHG-4 cannot be reasonably quantified, they were not taken into account in the CalEEMod emission calculations.

Although the ECRP is incorporated as a mandatory component of the Project, no GHG emissions reductions were applied to the CalEEMod assumptions for PDFs GHG-1 through PDF GHG-4 or for RRs GHG-1 through GHG-5. Therefore, the elimination of the ECRP, or the inclusion of it, would not result in any changes to the calculations or conclusions presented in Section 4.6, Greenhouse Gas Emissions. The requirement for the ECRP is not a mitigation measure that is necessary to reduce a significant impact, but rather a County policy designed to encourage alternatives to single-occupancy vehicle trips.

Sutton-54

As stated in PDF GHG-2 in Section 4.6, Greenhouse Gas Emissions, the Project will provide a combined minimum of 34 video-visiting stations on site, along with video interview rooms in transitional housing buildings. This is anticipated to reduce VMT associated with vehicle travel to the MLWDC by inmate visitors by providing more options and opportunities for visitation when compared to the two video-visiting stations currently located within CRDF. However, deductions of VMT and GHG emissions associated with the video-visiting stations were not quantified in the GHG analyses or in the Traffic Impact Study for the Project.

Because reductions in GHG emissions from PDF GHG-2 cannot be reasonably quantified, they were not taken into account in the CalEEMod emission calculations. Although PDF GHG-2 is incorporated as a mandatory component of the Project, no GHG emissions reductions were applied to the CalEEMod assumptions for PDFs GHG-1 through PDF GHG-4 or for RRs GHG-1 through GHG-5. Therefore, the elimination of the video visiting stations as set forth in PDF GHG-3, or the inclusion of them, would not result in any changes to the calculations or conclusions presented in Section 4.6, Greenhouse Gas Emissions.

Sutton-55

As stated in PDF GHG-3 in Section 4.6, Greenhouse Gas Emissions, the Project will post Antelope Valley Transit Authority (AVTA) bus and Metrolink schedules, as well as the locations of the nearest Park-and-Ride lots, in areas visible to visitors and in the Staff Services building to encourage the use of public transportation by staff and visitors. AVTA bus and Metrolink schedule information will be updated a minimum of every six months to ensure that they are accurate.

Because reductions in GHG emissions from PDF GHG-3 cannot be reasonably quantified, they were not taken into account in the CalEEMod emission calculations. Although PDF GHG-3 is incorporated as a mandatory component of the Project, no GHG emissions reductions were applied to the CalEEMod assumptions for PDFs GHG-1 through PDF GHG-4 or for RRs GHG-1 through GHG-5. Therefore, the elimination of the requirements set forth in PDF GHG-3, or the inclusion of them, would not result in any changes to the calculations or conclusions presented in Section 4.6, Greenhouse Gas Emissions.

Sutton-56

As stated in PDF GHG-4 in Section 4.6, Greenhouse Gas Emissions, the Project will incorporate (1) a secure storage area for staff to store bicycles into the Project design plans that allow for the individual locking of bicycles and protection from sun and inclement weather and (2) bicycle rack(s) adjacent to the Visitor Parking Lot that allows for the individual locking of bicycles.

Because reductions in GHG emissions from PDF GHG-4 cannot be reasonably quantified, they were not taken into account in the CalEEMod emission calculations. Although PDF GHG-4 is incorporated as a mandatory component of the Project, no GHG emissions reductions were applied to the CalEEMod assumptions for PDFs GHG-1 through PDF GHG-4 or for RRs GHG-1 through GHG-5. Therefore, the elimination of the requirements for bicycle facilities, or the inclusion of them, would not result in any changes to the calculations or conclusions presented in Section 4.6, Greenhouse Gas Emissions.

Sutton-57

As stated in the responses for Sutton-53 through Sutton-56, the analysis presented in Section 4.6, Greenhouse Gas Emissions, did not take any deductions from the total annual GHG emissions that would result from implementation of PDF GHG-1 through PDF GHG-4, nor were deductions taken for RRs GHG-1 through GHG-5 because the reductions in VMT and mobile GHG emissions from the implementation of these RRs cannot be reasonably quantified. Therefore, the GHG emission estimates presented in the Draft EIR are conservatively high, and the impacts are less than significant.

Sutton-58

This comment, in part, raises issues that extend beyond the scope of the CEQA requirements; nonetheless, the Board of Supervisors will receive and be able to consider it and all other comments raised before taking any action on the proposed Project. The scope of CEQA is generally limited to the evaluation of a proposed project's potential impact on the environment, and does not extend to the impact of the existing environment on a proposed project, or on its users or residents. The applicable definition of the environment analyzed for CEQA purposes in an EIR is the physical conditions in the area that are affected by the proposed project (e.g., land, air, and water). The proposed MLWDC Project's Draft EIR discloses and addresses the potential direct, indirect, and cumulative impacts of the proposed Project on the physical environment, in

accordance with the State CEQA Guidelines for all environmental issue areas. For the topics mentioned in the comment, refer specifically to Section 4.2, Air Quality, 4.6, Greenhouse Gas Emissions, and 4.14, Utilities and Service Systems of the Draft EIR.

Sutton-59

In 2015, the underground storage tanks (USTs) were reported to be in compliance and passed all leak detection requirements (CERS 2016, AW Associates 2016). As such, the use or removal of these tanks will not lead to leaks that may potentially contaminate the underlying soils and groundwater and no mitigation is required.

Sutton-60

The information on the removal of the six USTs was taken from the Phase I Environmental Site Assessment (ESA), which states that the information on the leaking underground tanks and clean up information was based on the list of Leaking Underground Storage Tanks (LUST) Sites (see Converse 2014c, pages 24 and 25) and the County Department of Public Works records (see Converse 2014c, pages 33 and 34). The County Department of Public Works oversaw the remediation and issued the "no further action" letter. The Phase I ESA is provided in Appendix E-1 of the Draft EIR.

Sutton-61

The sentence on page 4.7-8 of the Draft EIR states, "No leaks were observed, except for minor staining on the carpet and hydraulic oil on the concrete floors beneath the emergency generator in the central plant (i.e., steam plant)". This information on minor staining was taken from the Phase I ESA, which is provided in Appendix E-1 of the Draft EIR. The minor staining was observed near unlabeled five-gallon containers with a minor amount of an oil-tar-like substance in the Sergeant Senior Building (see Converse 2014c, pages 38 and 47). The hydraulic oil was observed on the floor beneath the hole punch machine in the George Barracks and the emergency generator in the central plant (see Converse 2014c, pages 5, 48, 51 and 52). Soil testing near the hole punch machine location was performed in January 2016, which indicated no significant contamination findings (Converse 2016b). No further assessment is required.

Sutton-62

The Asbestos and Lead Based Paint Survey Report (Appendix E-2 of the Draft EIR) states that Buildings 27, 28 and 29 are temporary modular buildings that were visually inventoried but not sampled. These are pre-fabricated modular units (i.e., mobile homes) that appeared to be of newer construction (Converse 2014a). Building 27 will remain in place but Buildings 28, 29 and 40 may be disassembled and removed from the site but not demolished. However, this is not certain at this time prior to the Project's final design.

As demonstrated in Section 4.7, Hazards and Hazardous Materials, of the Draft EIR, MM HAZ-1 and MM HAZ-2 requires that, in the event that building materials are encountered during construction activities that are suspected of being asbestos-containing materials (ACMs) or lead-based paint (LBP), these materials shall be assumed to contain asbestos or lead and shall be handled, removed, transported and/or disposed in accordance with applicable regulations, until such time that they can be sampled and evaluated. As provided in Appendix D of this Final EIR, subsequent testing of building material samples from Buildings 27, 28, 29, 32 and 40 indicate the presence of asbestos-containing materials in Buildings 28, 29 and 40; and lead-based paint was found in the sinks in Building 29. If Buildings 27, 28, 29, 32 and 40 are removed, without being

demolished, asbestos materials need not be abated. If these buildings are demolished, the asbestos materials would have to be abated and disposed in accordance with RR HAZ-4 and MM HAZ-1. If the sinks in Building 29 are removed intact, they can be disposed as construction debris; otherwise, they would have to be disposed in accordance with RR HAZ-4 and MM HAZ-2 (Converse 2016a).

Sutton-63

As stated on page 4.7-19 of the Draft EIR, the existing fueling station is located outside the Project site boundary, but may be used by the Project. This fueling station has two USTs that previously failed leak detection tests. As shown in the California Environmental Reporting System (CERS) database and the Monitoring System Certification by AW Associates in Appendix E to this Final EIR, the tank permits were updated in 2015 and have passed subsequent leak detection tests and are now in compliance. Soil testing also indicated there is no soil contamination near the USTs (Converse 2016b). MM HAZ-3 requires the testing and repair, as necessary, of the USTs prior to the use of the existing fueling station by the Project.

Sutton-64

Refer to the response for Sutton-11 above.

Sutton-65

Page 4.14-11 of Section 4.14, Utilities and Service Systems, states that the LACWWD 40 currently has a 36-inch-diameter, cement-lined, coated steel transmission water main located 25 feet from the property line along 60th Street West and a 12-inch-diameter pipe located within West Avenue I. The availability of water or the current drought conditions has no direct effects on this water infrastructure.

The LACWWD 40 has sufficient infrastructure to use State Water Project (SWP) water from AVEK to meet the water demands in its service area even during peak summer demand periods. The LACWWD 40 also has planned for potential water shortages through various demand management measures that would reduce water use and consumption. The WSA for the Project addresses drought conditions and states that future water supplies of the LACWWD 40 will be ensured through continued implementation programs such as water banking, purchase of new imported supplies, water transfers, water conservation, and expansion of recycled water systems (Psomas 2015).

As stated on page 4.14-8, of Section 4.14, Utilities and Service Systems, the adjudication process for the Antelope Valley Groundwater Basin acknowledges that the basin is in a state of overdraft. Allocation of groundwater rights would limit groundwater extraction in the basin to its safe yield and avoid continued overdraft conditions. As demonstrated on page 4.14-23, the LACWWD 40 has implemented a New Supply Acquisition program to provide funding for additional imported water supplies. Thus, while the Project would require water from the LACWWD 40 to operate, the LACWWD 40 will serve the Project with imported water supplies obtained through AVEK. MM UTL-1 requires that the County sign the New Water Supply Entitlement Acquisition Agreement with the LACWWD 40 and pay a deposit of \$10,000 per acre-foot of annual water demand from the Project for the acquisition of additional water supplies from AVEK to serve the Project. The WSA concludes that there is a sufficient and reliable water supply for LACWWD 40, now and into the future, including a sufficient water supply for the Project. These supplies are also sufficient to provide for overall growth in the LACWWD 40 service area at the rate projected in the 2010 IRUWMP (Psomas 2015).

Sutton-66

The historic water use numbers in Table 4.14-1 in Section 4.14, Utilities and Service Systems, are provided to show the amount of water pumped by on-site wells when the MLDC was in use as an Immigration and Customs Enforcement (ICE) facility until 2012. Since then, the Project site has been largely vacant and the water use has been limited. Water use data from the MLDC when it was occupied by ICE were not incorporated into the WSA analysis because the program was not in operation at the time of the issuance of the Project's Notice of Preparation (NOP). The NOP was issued in September of 2014 which, according to Section 15125 of the State CEQA Guidelines, establishes the existing physical conditions on the Project site from both a local and regional perspective, and constitutes the baseline conditions by which a lead agency determines whether an impact is significant. As such, the use of water from the historic uses at the Project site are not relevant to the future proposed Project operations, and no additional analysis is required.

Sutton-67

The Storm Water Pollution Prevention Program (SWPPP) must be prepared by a Qualified SWPPP Developer (QSD) and implemented by a Qualified SWPPP Practitioner (QSP) who will be responsible for monitoring that selected Best Management Practices (BMPs) are in place and in working condition at the construction site. The SWPPP must include BMPs to be implemented during construction, including a Construction Site Monitoring Program (CSMP). The primary objective of the SWPPP is to ensure that the responsible party properly constructs, implements, and maintains BMPs to reduce or eliminate pollutants in storm water discharges and authorized non-storm water discharges from the construction site. The SWPPP must also outline the monitoring and sampling program to verify compliance with discharge Numeric Action Levels (NALs) set by the Construction General Permit.

Public agency monitoring of compliance with the SWPPP is provided by State Water Resources Control Board (SWRCB) inspectors who visit construction sites and verify implementation of the BMPs and compliance with other requirements of the SWPPP. In addition, the Los Angeles County Department of Public Works (LACDPW) would also be performing site inspections to monitor compliance with the approved construction plans. Any person may also report a storm water pollution problems to the SWRCB or the local agency.

As stated in Section 4.8, Hydrology and Water Quality, PDF HYD-1 requires that the on-site storm drainage system comply with storm water quality and quality control requirements under the County's Standard Urban Stormwater Management Plan (SUSMP), Low Impact Development (LID) standards, the Hydrology Manual, the Best Management Practices Handbook, and the Green Building Standards Code. These requirements, along with RR HYD-2, address potential pollutant runoff from long-term operations of the Project and include a drainage concept and storm water quality plan that reduce peak storm water runoff discharge rates; conserve natural areas; minimize storm water pollutants of concern; protect slopes and channels; provide storm drain system stenciling and signage; properly design outdoor material storage areas and trash storage areas; and provide proof of ongoing maintenance of structural or treatment-control BMPs that would prevent pollutants from entering the runoff. The Project's permanent storm water treatment-control BMPs would be included in the final engineering plans for the Project; would be subject to the LACDPW's review and approval as part of the plan check process; and would be inspected during construction. Code enforcement actions by the County would monitor proper and continued use of these BMPs.

Sutton-68

Please refer to the response for Sutton-15 regarding the cost of the proposed Project.

Sutton-69

The MLDC property currently and historically obtains its water supply from an on-site system of groundwater wells, pumps, and tanks, as described in Section 4.14, Utilities and Service Systems. As part of the proposed Project, a new off-site water pipeline extension will be constructed from the on-site water lines to the existing 12-inch LACWWD 40-owned distribution pipeline in West Avenue I. Existing pipeline connections to County-owned groundwater wells and reservoirs located adjacent to 60th Street West will be disconnected, and the proposed MLWDC Project site's potable water supply would be provided by LACWWD 40 rather than from the County-owned groundwater wells.

The LACWWD 40 obtains water primarily from local groundwater resources and imported water from the State Water Project through AVEK. In the past few years, recycled water has been introduced to the LACWWD 40 service area by the City of Lancaster, and the LACSD No. 14 continues to serve recycled water directly to Apollo Park. However, recycled water is not yet available to the Project site.

Therefore, it cannot be said that the Project will not use groundwater because the Project will be served by LACWWD 40, which sources its water supply from both groundwater and SWP water. However, the MLWDC property will no longer be connected to the County's system of wells, pumps, and tanks and will not be directly provided water via this groundwater pumping and distribution system.

The environmental impacts associated with the acquisition and development of additional imported water supplies is the responsibility of AVEK. As stated in the WSA prepared for the Project (see Appendix B of the WSA – MOU Between AVEK and Waterworks District No. 40), included as Appendix G-2 of the Draft EIR (Psomas 2015):

The Waterworks District and AVEK will enter into an agreement by which the Waterworks District may require the applicant to deposit with the Waterworks District the amount of money estimated by AVEK to be necessary to fund AVEK's cost of purchasing the additional imported water supplies required by the Waterworks District as a condition of providing a service commitment to the applicant's development. Upon receipt of that deposit by the applicant, the Waterworks District will then deposit that amount with AVEK. The deposit shall cover the estimated purchase price of the additional water supplies, AVEK's cost of completing the environmental assessment under the California Environmental Quality Act and the National Environmental Policy Act (if required), and AVEK's transactional costs including document preparation and review by AVEK staff and legal counsel ("Costs").

MM UTL-1 requires that the County sign the New Water Supply Entitlement Acquisition Agreement with the LACWWD 40 and pay a deposit of \$10,000 per acre-foot of annual water demand from the Project for the acquisition of additional water supplies from AVEK to serve the Project. Therefore, the impacts of importing water on traffic and air quality is determined through the appropriate CEQA/National Environmental Policy Act (NEPA) documentation prepared by AVEK to support the procurement of additional imported water supplies.

Sutton-70

As stated in Section 4.8, Hydrology and Water Quality, and Section 4.14, Utilities and Service Systems, existing water lines connected to the on-site wells and reservoirs would provide the needed water for construction activities, replacing existing water use from minor maintenance and security activities. The proposed connection to the LACWWD 40 12-inch potable water line within West Avenue I would not need to be connected in order to conduct construction activities or suppress potential dust generated by earth-moving activities because the existing and operational County-owned groundwater pumping and storage system infrastructure would be available at the Project site.

Sutton-71

As stated on page 4.11-5 of Section 4.11, Population and Housing, the growth projections in Table 4.11-6 are projections that were prepared by the Southern California Association of Governments (SCAG) for individual cities and counties as part of its regional planning efforts for the development of the Regional Comprehensive Plan (RCP), Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), and the Regional Housing Needs Assessment (RHNA). These projections were adopted by the SCAG Board in 2012.

The IRUWMP for the Antelope Valley also includes growth projections for the service areas of the LACWWD 40 and the Quartz Hill Water District service area. As stated in Table 1-3 of the Integrated Regional Urban Water Management Plan, these growth projections were based on land use maps and General Plans for the cities of Palmdale and Lancaster (LACWWD 40 2011).

Because the boundaries of the SCAG projections follow city boundaries, which differ from the service area boundaries of the water districts, these projections are not comparable to the other. Still, the SCAG projections are also used in the analysis of cumulative impacts in Section 4.11.5 of the Draft EIR. The projections in the IRUWMP for the Antelope Valley are used in the LACWWD 40's plans to meet future water demands in their service areas, as demonstrated in Section 4.14.7 of the Draft EIR.

Sutton-72

The Project would be staffed by Sheriff's Department security/sworn staff, Sheriff's Department civilian staff, teachers, counselors, maintenance personnel, physicians, registered nurses, registered nurse practitioners, and other County employees. There is no specific breakdown of the skills and experience of unemployed residents in the City of Lancaster. Thus, a match of the future jobs at the MLWDC and the unemployed residents cannot be readily made. However, this does not preclude Lancaster residents from taking training or learning the skills needed to work at the Project.

Sutton-73

According to the California Department of Forestry and Fire Protection (CAL FIRE), the Very High Fire Hazard Severity zone is located at the base of the Sierra Pelona Mountains to the south, which is outside the city boundaries of Lancaster. The 4.5-mile distance between this zone and the site includes relatively flat areas with urban development that are not considered to be in a Very High Fire Hazard Severity Zone area. Thus, no wildfire hazards are present on or near the site.

Sutton-74

This comment, in part, raises issues that extend beyond the scope of the CEQA requirements; nonetheless, the Board of Supervisors will receive and be able to consider it and all other comments raised before taking any action on the proposed Project. The scope of CEQA is generally limited to the evaluation of a proposed project's potential impact on the environment, and does not extend to the impact of the existing environment on a proposed project or on its users or residents. The applicable definition of the environment analyzed for CEQA purposes in an environmental impact report is the physical conditions in the area that are affected by the proposed project (e.g., land, air, and water). The proposed MLWDC Project's Draft EIR discloses and addresses the potential direct, indirect, and cumulative impacts of the proposed Project on the physical environment, in accordance with the State CEQA Guidelines for all environmental issue areas.

Outdoor recreation, both active (e.g., use of sports courts, running track) and passive (e.g., sitting in courtyards or on turf grass areas), will occur on the Project site. The outdoor recreation opportunities and amenities are one of the benefits of the proposed MLWDC Project when compared to existing facilities at the CRDF. There are no known reasons to believe that risks of infection from Valley Fever from participating in outdoor recreational activities at the MLWDC site would be any different from the risks of participating in outdoor activities elsewhere in the Lancaster portion of the Antelope Valley.

Sutton-75

As shown in Exhibit 3-1 in Section 3.0, Project Description, the volleyball and basketball courts are outdoor facilities. The Project does not include an indoor gymnasium.

Sutton-76

Section 4.13, Transportation and Traffic, summarizes the findings of the Traffic Impact Study for the Project. The Traffic Impact Study is provided in Appendix H of the Draft EIR. As stated on pages 4.13-2 to 4.13-3, the estimate of the Project's daily trip generation was based on specific data provided by the Los Angeles County Sheriff's Department and includes employee shift times, number of employees per shift, frequency of inmate transport buses, and miscellaneous service/delivery vehicles, among other factors. The miscellaneous vehicle trips due to service/delivery, medical delivery, and court personnel transport were estimated at no more than 25 vehicles per weekday and at ½ of this total for weekend daily trips.

The discussion of video visitation on page 4.13-20 is provided in the context of estimating the total vehicle miles travelled (VMT) as associated with the located of the MLWDC away from the highly urbanized area of Los Angeles County, but is not considered in the trip generation estimates in the Traffic Impact Study. Rather, the number of trips for inmate visitation was estimated at 39 percent of the available appointment slots or about 28,543 visits per year (the same rate as existing at the CRDF). Forecasts assume 250 inbound visitor trips and 250 outbound visitor trips per day during the 114 weekend days and holidays per year. This visitation reflects the number of visitors that are currently occurring at a detention facility that is located in the highly urbanized area of Los Angeles County. With this estimate, it is expected that video visitation would occur in addition to the in-person visits that involve personal vehicle trips to the MLWDC. Therefore, contrary to the commenter's assertion, the Draft EIR does not assume that video visitation is a mitigation for increased traffic.

Sutton-77

As discussed on page 4.13-23 and 4.13-24 of the Draft EIR, the existing transit services in the area will adequately accommodate the increase of Project-generated transit trips. The County does not operate the buses and trains that serve the Antelope Valley area. The Southern California Regional Rail Authority (SCRRA), which operates the Metrolink commuter rail system, and the AVTA, which operates buses, provide transit services to meet demand and generally review service routes and schedules as part of their long-range planning efforts. Should demand increase over existing levels, it will be up to the Metrolink and AVTA agencies to revise or expand their services to meet demand. There is a bus stop at the former High Desert Regional Health Center that is located south of the Project site.

Sutton-78

The City of Lancaster has jurisdiction over the City roadways and the implementation of bicycle lanes within the City. As stated on page 4.13-24 of Section 4.13, Transportation and Traffic, while the City of Lancaster has no existing or proposed bikeways on 60th Street West and West Avenue I along the site boundaries, roadway shoulders and sidewalks in the area may be used by bicyclists and pedestrians coming to or going from the Project site.



MIRA LOMA WOMEN'S DETENTION CENTER PROJECT
PUBLIC MEETING- DECEMBER 8, 2015
6:00 TO 8:00 PM

COMMENTS:

I oppose for this project because we already
got enough jails, we don't need new ones
it don't matter if is for women or men.

} Vasquez-1

NAME: MARIO VASQUEZ
ADDRESS: 2936 1/2 WYATTIER BLVD LA CA 90023
E-MAIL: _____

Mario Vasquez

Vasquez-1

Although the Project site has been unoccupied since 2012, as discussed in Section 2.0, Environmental Setting, the Project site has generally been in operation and providing various detention/jail functions from 1945–1946 until 2012. The MLWDC Project proposes the adaptive reuse, renovation, and expansion of the majority of the buildings at MLDC, which is an existing County asset. The redevelopment of the property would avoid the costs associated with constructing a new facility.

This comment relates to the merits of the proposed Project and not the environmental analysis included in the Draft Environmental Impact Report (EIR) or the environmental impacts of the Project. This Final EIR, including all comments submitted to the County on the Draft EIR, will be provided to the County of Los Angeles Board of Supervisors. Therefore, your concerns will be presented directly to the decision makers prior to consideration of Project approval.

-----Original Message-----

From: Christine Wang [mailto:donotreply@wordpress.com]

Sent: Tuesday, January 12, 2016 4:15 PM

To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental <environmental@ceo.lacounty.gov>; lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov; FifthDistrict@lacbos.org

Subject: Attn: Mira Loma Women’s Jail, Environmental Impact Report

Name: Christine Wang

Email: christine.tienwang@gmail.com

Address: 1348 Venice Blvd

City: Los Angeles

State: CA

Zip Code: 90006

Comment (please personalize): Dear LA County Board of Supervisors and Chief Executive Office, Please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

Southern California Gas (SCG) will be providing the natural gas services according to the proposal in the EIR. SCG has indicated that there are high-pressure main gas lines in public streets in the area that may serve the Project (Draft EIR 4.14-14).

This is the same gas company that has leaked over 80,000 metric tons (and counting) of methane gas into the atmosphere prompting the evacuation of Porter Ranch and other areas as well as a state of emergency declaration by Governor Jerry Brown.

The Los Angeles Daily News reported on December 25, “Los Angeles County health officials said prolonged exposure to trace chemicals, some of which are known carcinogens, can cause long-term health effects.” The Southern California Gas an irresponsible contractor who has failed to properly account for the negative consequences it has caused to the health of LA County residents. Until the Porter Ranch gas leak is fully contained, an investigation completed, and reparations to impacted residents paid, LA County must not engage in any new contracts with Southern California Gas. This proposed partnership puts Lancaster residents and the potential imprisoned population at health risk. Additionally, if the gas leak continues at the current rate of depletion, it is questionable whether there will even be a sufficient gas supply available for use by the time of proposed construction completion. After the County commissions a thorough additional study, the Draft EIR must be updated with other gas or electric options to deal with energy consumption in the proposed Mira Loma Jail in order to be accepted.

This proposed jail is unsafe for LA County communities and our environment. Southern California Gas is not a safe or reliable provider of energy for the proposed Mira Loma site. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

Sincerely,

Critical Resistance Los Angeles

Christine Wang

Wang-1
Wang-2
Wang-3

Time: January 13, 2016 at 12:15 am

IP Address: 64.183.42.63

Contact Form URL: <http://lanomorejails.org/2016/01/05/urgent-submit-comment-now-against-proposed-new-la-county-jail/>

Sent by an unverified visitor to your site.

Christine Wang (January 12, 2016)

Wang-1

The Southern California Gas Company (SCG) provides natural gas services to the Lancaster area, and there is no other natural gas provider in the area. Although the Project would be served by SCG, the County has no partnership with SCG. As of March 2016, the Porter Ranch leak has been stopped. The California Public Utilities Commission (CPUC) regulates SCG, which is a private utility company, and it is anticipated that existing CPUC regulations, as well as other applicable regulations and any future regulations that would arise from the Porter Ranch gas leak, would protect public health and safety.

Wang-2

As stated in Section 4.15, Energy, on page 4.15-5 of the Draft Environmental Impact Report (EIR), the DLR Group estimates that the Project would use 7,200 million British Thermal Units (BTU) of natural gas per year (DLR 2015). SCG has 136 billion cubic feet (Bcf) of storage capacity, with 83 Bcf used for existing core customers, 4 Bcf for system balancing, and the remaining 49 Bcf available for other [new] customers (SCG 2015). The Project's natural gas demand is equal to 7.2 million BTU, or less than 0.01 percent of SCG's storage capacity for its natural gas supplies and would not, therefore, create a significant effect on either peak or base load energy demand.

Wang-3

Regarding the commenter's concern that the site is unsafe, the Draft EIR provides extensive information regarding potential Project hazards, including in Section 4.7, Hazards and Hazardous Materials.

As part of the environmental analysis for the Draft EIR, the Phase I Environmental Site Assessment (ESA) has been prepared that reviewed past and current uses and site conditions and identified Recognized Environmental Concerns (RECs) on the Project site and surrounding area. The Phase I ESA is provided in Appendix E-1 of the Draft EIR. Subsequent to the Phase I ESA, a Phase II ESA was prepared that included soil sampling to determine if soil contamination is present on the site. The Phase II ESA is provided in Appendix E-3 of the Draft EIR. In addition, an Asbestos and Lead Based Paint Survey Report was completed to identify the building components that contained asbestos and lead-based paint. The Asbestos and Lead Based Paint Survey Report is provided in Appendix E-2 of the Draft EIR. These reports are discussed in Section 4.7, Hazards and Hazardous Materials, of the Draft EIR.

The Project must comply with existing regulatory requirements (RRs) for the proper handling of hazardous wastes, including transportation, treatment, storage, and disposal; repair and/or removal of underground storage tanks based on applicable standards; and practices that would protect the demolition and construction crews from asbestos and lead exposure. In addition, the Project must incorporate mitigation measures (MMs) for the handling of suspected asbestos-containing materials and lead-based paint; an Operations and Maintenance Plan for regular inspection of any asbestos-containing materials; and testing and repair of underground storage tanks prior to use. Thus, existing hazardous materials and wastes would be removed from the Project site and future hazardous materials use would comply with applicable regulations to prevent hazards to future inmates. In summary, compliance with RRs and implementation of MMs set forth in the Draft EIR would prevent public health and safety hazards to inmates, employees, visitors, and other individuals at the Project site.

Regarding the commenter's concern regarding SCG as a safe and reliable provider of energy, please refer to the responses above for Wang-1 and Wang-2. This Final EIR, including all comments submitted to the County on the Draft EIR, will be provided to the County of Los Angeles Board of Supervisors. Therefore, your concerns will be presented directly to the decision makers prior to consideration of Project approval.



MIRA LOMA WOMEN'S DETENTION CENTER PROJECT
PUBLIC MEETING- DECEMBER 8, 2015
6:00 TO 8:00 PM

COMMENTS:

- put an end to the incarceration of poor people
(ie - people that cant afford bail) } Watkins-1
- What about VALLEY FEVER?? What will happen
to the women who will be exposed?? } Watkins-2
- a new jail ~~is~~ in Lancaster will lead to increased
traffic } Watkins-3
- the environmental impact report MUST be
translated into spanish } Watkins-4

NAME: Yazmin Watkins

ADDRESS: 5050 Klmp Ave, North Hollywood, CA 91601

E-MAIL: yazmin.watkins@yahoo.com

Yasmin Watkins

Watkins-1

The comment asks for ending jailing, particularly of economically disadvantaged inmates. This comment relates to the merits of the proposed Project and not the environmental analysis included in the Draft EIR or the environmental impacts of the Project. Purely social effects of a project are beyond the scope of CEQA analysis, which focuses on the proposal's effect on the physical environment. This Final Environmental Impact Report (EIR), including all comments submitted to the County on the Draft EIR, will be provided to the County of Los Angeles Board of Supervisors. Therefore, your concerns will be presented directly to the decision makers prior to consideration of Project approval.

Watkins-2

Coccidioidomycosis, also known as Valley Fever, and its potential impact on potential future inmates and County staff is discussed in Section 4.2, Air Quality. A summary of hazards associated with the *Coccidioides* spores (i.e., the fungus that causes Valley Fever) is provided and includes summaries of trends related to Valley Fever in Los Angeles County, as inventoried and reported by the Los Angeles County Department of Public Health (LACDPH), which was consulted during the preparation of the Draft EIR.

The Draft EIR summarizes the LACDPH 2013 *Annual Morbidity Report*, which presents the recent trends related to Valley Fever in Los Angeles County, including the increasing incidence rate within the last ten years. Data included in this report show the incidence in Valley Fever in Service Planning Area (SPA) 1 (i.e. Antelope Valley) from 2009 to 2013. The number of incidents of Valley Fever infection spiked in 2011 in SPA 1 with 93 reported cases, which represented 30 percent of cases in Los Angeles County, with an incidence rate of 25 per 100,000 people. The incidence rate decreased to 74 reported cases in both 2012 and 2013. As such, in 2013, SPA 1 represented approximately 20.4 percent of the total reported cases in Los Angeles County, with an incidence rate of 19 per 100,000 people. SPA 1 has the highest infection rate in Los Angeles County (LACDPH 2013).

However, the rate of Valley Fever infection in Los Angeles County, and the Antelope Valley specifically, is substantially less than in neighboring Kern County, which had a 2013 infection rate of 276 per 100,000 people in the north valley region (KCPHSD 2016). The eastern portion of San Luis Obispo County had Valley Fever infection rates ranging from 205 to 257 per 100,000 people between 2007 and 2012 (SLOCPHD 2014). Therefore, although the Antelope Valley has the highest rates in Los Angeles County, the rates are well below rates found nearby counties where Valley Fever is endemic.

The overall incidence rate of Valley Fever in the Antelope Valley was not determined to warrant changes in the County's protocol for disease prevention, notwithstanding the fact that the County health and public health officials are well educated on the condition; are familiar with its incidence in the County and elsewhere in the state; and are involved in research and education on the subject of Valley Fever.

Also, as demonstrated in Section 4.2, Air Quality the California Department of Corrections and Rehabilitation (CDCR) has not identified the Lancaster area as being a geographic location that requires screening or interventions for the State prison population with regard to exposure to Valley Fever (CDCR 2013). Additionally, the LACDPH has not identified the previous U.S. Immigration and Customs Enforcement (ICE) detainee population at the Mira Loma Detention

Center (MLDC), the future inmate population at the Mira Loma Women's Detention Center (MLWDC), or earlier occupants at the High Desert Health System (HDHS) Multi-Ambulatory Care Center (MACC) (the adjacent hospital facility, which has relocated in Lancaster) as requiring the implementation of health screening protocols or other measures to address potential Valley Fever exposure.

The operation of the MLWDC will follow standard Sheriff's Department procedures for medical care and prevention with regard to health care for inmates in general, and Valley Fever specifically, and the Sheriff's Department will continue to coordinate with the LACDPH (Masis 2015). The LACDPH is the designated County agency with the mandate to protect health, prevent disease, and promote the health and well-being of all persons within Los Angeles County. As such, any future changes in LACDPH policies that may be made regarding Valley Fever for inmate populations will be implemented, as applicable, throughout the County jail system.

The MLWDC property is not located in an area determined to be hazardous to the health of local residents or visitors to the region. The Draft EIR concludes that the potential future inmate population's temporary placement into the Antelope Valley, which includes the inmates' participation in all indoor and outdoor activities at the MLWDC, would not constitute placement into a hazardous existing environmental setting that would require mitigation. Additionally, the operation of the proposed Project would not increase the prevalence of Valley Fever spores or otherwise exacerbate an existing environmental condition.

Watkins-3

Regarding the commenter's concern about increased traffic, Section 4.13, Transportation and Traffic, of the Draft EIR discusses potential impacts related to Project-generated traffic. The analysis indicates that increase in traffic volumes would not significantly impact local intersections (intersections would still operate at Level-of-Service D or better), or alternative transportation (Metrolink trains or Antelope Valley Transit Authority [AVTA] bus service), and impacts on California Department of Transportation (Caltrans) facilities would be less than significant. As discussed on page 4.13-23 and 4.13-24, the existing transit services in the area will adequately accommodate the increase of Project-generated transit trips. No mitigation is required for short-term construction or long-term operational traffic impacts.

Watkins-4

The County voluntarily added additional outreach in Spanish for the MLWDC Draft EIR public review process as a result of public comments. In January 2016, a *Notice of Extended Comment Period for the Draft Environmental Impact Report for the Mira Loma Women's Detention Center Project and Notice of Second Public Meeting in Lancaster, California* was sent to the Project's mailing list and email list, as well as additional mailing list contacts that had provided comment letters during the Draft EIR public review period up to the time of the second mailing. This Notice was prepared in both English and Spanish. Additionally, the Executive Summary of the Draft EIR was translated into Spanish and posted on the County's website for viewing and downloading. Hardcopies of the Spanish-translated Executive Summary were made available at the Quartz Hill and Lancaster Libraries, as well as the Los Angeles County Public Information Office. Newspaper advertisements of the extended comment period and second public meeting were placed in the following papers and ran on Monday, February 1, 2016:

- *Acton-Aqua Dolce News*: a weekly publication so the ad was available for 7 days
- *Los Angeles Daily News*: a daily publication
- *La Opinion*: a daily publication (the ad was in both English and Spanish)

- *Antelope Valley Press*: a daily publication
- *Antelope Valley Times*: an online publication

A second public meeting was held on Tuesday, February 9, 2016 at the Lancaster Public Library at 601 West Lancaster Boulevard in Lancaster, CA 93534 to present an overview of the proposed Project and the Draft EIR process and conclusions, and to invite submission of public comments on the Draft EIR. Real-time Spanish translation services were made available, as were copies of the Notice and the Executive Summary in both English and Spanish. Two members of the public attended that meeting and neither requested Spanish translation services.



MIRA LOMA WOMEN'S DETENTION CENTER PROJECT
PUBLIC MEETING- DECEMBER 8, 2015
6:00 TO 8:00 PM

COMMENTS:

1. Have the LA County and city govt. thoroughly researched alternatives to locking people up? Williams-1
2. Have they examined the negative impacts of incarceration on marginalized communities? Williams-2
3. What are they doing to reduce recidivism and promote rehabilitation? Williams-3

NAME: Woman Joseph Williams
ADDRESS: 1375 W. 20th St, Apt 5, Los Angeles, CA 90007
E-MAIL: woman.j.williams@gmail.com

Norman Joseph Williams

Williams-1

This comment questions whether the Draft Environmental Impact Report (EIR) considered alternatives to incarceration. The Draft EIR, in fact, addresses alternatives in accordance with the California Environmental Quality Act (CEQA, *California Public Resources Code*, Sections 21000 et seq.) and the State CEQA Guidelines (14 *California Code of Regulations* [CCR]). As demonstrated in Section 5.0, Project Alternatives, an EIR must describe a range of reasonable and of potentially feasible alternatives to the proposed Project, or to the location of the Project, which would feasibly attain most of the basic Project Objectives but would avoid or substantially lessen any significant effects. Based on the analyses in Sections 4.1 through 4.15 of the Draft EIR, the proposed Project would result in significant environmental effects prior to mitigation on a number of environmental topics. Following mitigation, however, impacts to all of these topical areas would be avoided or reduced to less than significant levels with the implementation of mitigation measures. No significant and unavoidable impacts would occur with the Project.

Additionally, an EIR is not required to consider alternatives that are infeasible. The range of alternatives is governed by a "rule of reason" that requires discussion of only those alternatives necessary for the County of Los Angeles Board of Supervisors (Board) to make a reasoned choice. As demonstrated in Section 3.0, Project Description, on October 22, 2013, the Board authorized the evaluation of a proposal to use a portion of the Mira Loma Detention Center (MLDC) property as the site for a female detention facility in lieu of the Pitchess Detention Center (PDC) site previously proposed. In May, 2014, the Board directed that "Option 1B" be studied, as recommended in the *Los Angeles County Jail Plan Independent Review and Comprehensive Report* (Jail Plan Report). Option 1B recommended continued evaluation of renovating the facility at the MLDC for a women's detention center. The Draft EIR has been prepared to evaluate the environmental impacts of pursuing the proposed Project, in compliance with this Board of Supervisors directive.

The Board of Supervisors has adopted numerous recent actions to reduce the number of people who are incarcerated in Los Angeles County, particularly those with mental illness and/or substance use disorders. The Board of Supervisors' 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 in a document entitled "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".

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 Countywide Criminal Justice Coordination Committee. All Advisory Board members participated in the Countywide 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 of Los Angeles Chief Executive Office (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 Re-Entry (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 of Supervisors determined the Office will be a part of the Department of Health Services and the Director of the Office will report to the Director of the Department of Health Services. The Director of this Office will be 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, the Superior Court, the Public Defender, the Alternate Public Defender, Probation, the District Attorney, Mental Health, Public Health, and Health Services.

The Office will oversee Countywide diversion efforts including a system of integrated mental, physical and public health care services and supportive housing for those at risk of homelessness who are re-directed 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 of Supervisors directed that future budget allocations be a part of the annual budget process. On September 1, 2015, the Board of Supervisors also directed that the Office distribute funding so at least 1,000 individuals would be diverted across all intercept points within the criminal justice system.

The Criminal Justice Mental Health Advisory Board report of August 2015 concluded that even with increased opportunities for diversion from a jail environment, there will still be a need for mental health treatment in jails, and that diversion efforts can reduce, but will not eliminate, the need for the County to operate detention facilities. In light of the County's diversion efforts, the Board of Supervisors directed that, for purposes of on-going study and evaluation in the environmental review process, the maximum size of the proposed women's detention center at Mira Loma in Lancaster would remain at 1,604 beds. In addition the Board of Supervisors reduced the maximum proposed size by approximately 1,000 beds, for purposes of the environmental review of a separate proposed treatment and detention center addressing needs of incarcerated men and women with mental illness and/or substance use disorders at the site of the current Men's Central Jail in downtown Los Angeles. In summary, the Board of Supervisors has taken steps to reduce the number of people who are incarcerated in Los Angeles County.

The Draft EIR Section 5.0, Project Alternatives, was prepared in accordance with Sections 15126.6(a) through 15126.6(f) of the State CEQA Guidelines and adequately considers alternatives to the proposed Project. Out-of-custody alternatives were not required to be analyzed in the Draft EIR beyond the No Project alternative analyses and they would not be able to achieve the Project's primary goal, as stated below and in Section 5.3.2 of the Draft EIR.

The Project's goal is to provide detention facilities for low- to medium-security level female inmates that meet modern correctional standards and that prioritize the on-site integration of gender-responsive female inmate education, treatment, and vocational training. This goal focuses on providing a secure detention facility with

cost-effective therapeutic and rehabilitative programs to meet needs of eligible female inmates in order to reduce recidivism.

Potential environmental impacts associated with “no action,” on the proposed Project are described in Alternative 1A: No Project/Continuation of Existing Operations and Alternative 1B: No Project/Predictable Actions, as demonstrated in Section 5.0, Alternatives. These alternatives provide information regarding the potential impacts to the environment if the County does not move forward with the proposed Project. This Final EIR, including all comments submitted to the County on the Draft EIR, will be provided to the County of Los Angeles Board of Supervisors. Therefore, your concerns will be presented directly to the decision makers prior to consideration of Project approval.

Williams-2

This comment asks if the negative impact of incarceration on “marginalized communities” has been addressed. Purely social effects of a project are beyond the scope of CEQA analysis, which focuses on the proposal’s effect on the physical environment.

Inmates in the Los Angeles County jail system are incarcerated in accordance with established laws, and the process of determining which women are appropriately incarcerated is beyond the scope of the CEQA analysis.

This comment relates to the merits of the proposed Project, and not the environmental analysis included in the Draft EIR or the environmental impacts of the Project. This Final EIR, including all comments submitted to the County on the Draft EIR, will be provided to the County of Los Angeles Board of Supervisors. Therefore, your concerns will be presented directly to the decision makers prior to consideration of Project approval.

Williams-3

The comment asks about reducing recidivism and promoting rehabilitation. As stated in the Project Objectives in Section 3.0, Project Description, the MLWDC Project would prioritize the on-site integration of gender-responsive female inmate education, treatment, and vocational training to reduce female inmate recidivism. The Project would reduce recidivism through programming and development of a women’s detention facility at a site with sufficient space to accommodate both campus-style inmate housing and support facilities for education and vocational training, implementing the best practices of Education Based Incarceration (EBI).

The Project will offer general education classes, computer training, general and vocational career technical education, college courses, career counseling, a learning resource center, a library and computer labs, culinary classes, and indoor/outdoor recreation for inmates. Other services include religious services, counseling services, and community transition services. Participation in classes, training, and other activities will be scheduled for each inmate according to individual evaluation, interests, needs, and availability.

Course selections will be determined based on a students’ needs for specific services, and students’ interest levels. Courses will be offered during three blocks of time each weekday (morning, afternoon, and evening), providing opportunities for inmates to be enrolled in multiple courses. Programs are also divided into three categories based on program intensity: all-day, half-day, and evening programs. Examples of all-day programs (morning and afternoon) include culinary arts programs, cosmetology programs, and Prisoner Assisted Community Enhancement (PACE). Examples of half-day programs (morning or afternoon) include: small engine repair;

animal grooming/training; social media management and marketing/office assistant; automotive detailing, windshield and headlight repair; and recycling. Examples of evening programs include: computer coding; small business entrepreneurship; community college; Associate of Arts Degree; and General Education. Other programs include prenatal programs, volunteer programs; peer mentoring; physical education; dance; arts and crafts; a commissary program; and book clubs.

Additionally, as demonstrated on page 3-4, in Section 3.0, Project Description, the Board of Supervisors directed the establishment of an Advisory Board (now called the Gender Responsive Advisory Committee) that will report to the Board of Supervisors on specific programmatic and operational issues. The Advisory Committee has already begun to organize its meetings with a membership including representatives of County staff, outside agencies, advocates, organizations, individuals with incarceration experience, and representatives with expertise in reducing recidivism of female inmates. As part of its charge, the Advisory Committee is tasked with reviewing the program model for the proposed MLWDC Project to ensure that it is evidence-based in reducing recidivism; evaluating strategies to reduce negative impacts of operating the proposed MLWDC away from the downtown Los Angeles area, including contract transportation for visitors, video visiting for attorney consultation; and reviewing national best practices for visiting and family reunification.



MIRA LOMA WOMEN'S DETENTION CENTER PROJECT
PUBLIC MEETING- DECEMBER 8, 2015
6:00 TO 8:00 PM

COMMENTS:

Given the environmental hazards of the proposed site, how is it possible that the humanity of ~~the~~ individuals that will be held here is valued less than those anywhere else? Exposed to these risks and harms is undue punishment and treatment.

Wong-1

NAME: Kenny Wong

ADDRESS: _____

E-MAIL: kennywong@gmail.com

Kenny Wong

Wong-1

This comment alleges generally that the Project site would expose individuals incarcerated in the jail to environmental hazards. The Draft EIR for the proposed Project has been prepared in accordance with the California Environmental Quality Act (CEQA, *California Public Resources Code*, Sections 21000 et seq.) and the State CEQA Guidelines (14 *California Code of Regulations* [CCR]), and addresses the potential direct, indirect, and cumulative impacts of the Project on all environmental issue areas. As demonstrated throughout the Draft EIR, all potentially significant impacts have been reduced to levels that are less than significant through the identified mitigation measures, and no significant unavoidable environmental impacts would result from Project implementation.

For specific impacts related to hazards and hazardous materials, a Phase I Environmental Site Assessment (ESA) has been prepared that reviewed past and current uses and site conditions and identified Recognized Environmental Concerns (RECs) on the Project site and surrounding area. The Phase I ESA is provided in Appendix E-1 of the Draft EIR. Subsequent to the Phase I ESA, a Phase II ESA was prepared that included soil sampling to determine if soil contamination is present on the site. The Phase II ESA is provided in Appendix E-3 of the Draft EIR. In addition, an Asbestos and Lead Based Paint Survey Report was completed to identify the building components that contained asbestos and lead-based paint. The Asbestos and Lead Based Paint Survey Report is provided in Appendix E-2 of the Draft EIR. These reports are summarized in Section 4.7, Hazards and Hazardous Materials of the Draft EIR.

The Project must comply with existing regulatory requirements (RRs) for the proper handling of hazardous wastes, including transportation, treatment, storage, and disposal; repair and/or removal of underground storage tanks based on applicable standards; and practices that would protect the demolition and construction crews from asbestos and lead exposure. In addition, the Project must incorporate mitigation measures (MMs) for the handling of suspected asbestos-containing materials and lead-based paint; an Operations and Maintenance Plan for regular inspection of any asbestos-containing materials; and testing and repair of underground storage tanks prior to use. Thus, existing hazardous materials and wastes would be removed from the Project site and future hazardous materials use would comply with applicable regulations to prevent hazards to future inmates. In summary, compliance with RRs and implementation of MMs set forth in the Draft EIR would prevent public health and safety hazards to inmates, employees, visitors and other individuals at the Project site.

This Final EIR, including all comments submitted to the County on the Draft EIR, will be provided to the County of Los Angeles Board of Supervisors. Therefore, your concerns will be presented directly to the decision makers prior to consideration of Project approval.



MIRA LOMA WOMEN'S DETENTION CENTER PROJECT
PUBLIC MEETING- DECEMBER 8, 2015
6:00 TO 8:00 PM

COMMENTS:

As Executive Director of a Community Based organization and a resident of the county of Los Angeles, I vehemently oppose any new construction of new jails due to the harmful environmental impacts on our communities. The proposed site will be housed on a site that has been universally recognized as a hazardous materials site, posing health risks for all those housed inside the facility. Further new jail in Lancaster will bring more traffic pollution to the surrounding community. We need to find alternatives to incarceration such as mental health, job training and placement programming.

- Zardeneta-1
- Zardeneta-2
- Zardeneta-3
- Zardeneta-4

NAME: Robert Zardeneta
ADDRESS: 617 S. Vancouver Ave. Los Angeles CA 90022
E-MAIL: rzardeneta@gmail.com

Robert Zardeneta

Zardeneta-1

Although the Project site has been unoccupied since 2012, as discussed in Section 2.0, Environmental Setting, the Project site has generally been in operation and providing various detention/jail functions from 1945–1946 until 2012. The MLWDC Project proposes the adaptive reuse, renovation, and expansion of the majority of the buildings at MLDC, which is an existing County asset. The redevelopment of the property would avoid the costs associated with constructing a new facility.

This comment raises the issue of harmful environmental impacts. The Draft Environmental Impact Report (EIR) for the proposed Project has been prepared in accordance with the California Environmental Quality Act (CEQA, *California Public Resources Code*, Section 21000 et seq.) and the State CEQA Guidelines (14 *California Code of Regulations* [CCR]), and addresses the potential direct, indirect, and cumulative impacts of the Project on all environmental issue areas. Section 5.0, Project Alternatives, was prepared in accordance with Sections 15126.6(a) through 15126.6(f) of the State CEQA Guidelines. As demonstrated throughout the Draft EIR, all potentially significant impacts have been reduced to levels that are less than significant through the identified mitigation measures, and no significant unavoidable environmental impacts would result from Project implementation.

Zardeneta-2

Regarding the comment on the hazardous materials site, the Project site was never operated as a site that accepted hazardous wastes for disposal.

As part of the environmental analysis for the Draft EIR, a Phase I Environmental Site Assessment (ESA) has been prepared that reviewed past and current uses and site conditions and identified Recognized Environmental Concerns (RECs) on the Project site and surrounding area. The Phase I ESA is provided in Appendix E-1 of the Draft EIR. Subsequent to the Phase I ESA, a Phase II ESA was prepared that included soil sampling to determine if soil contamination is present on the site. The Phase II ESA is provided in Appendix E-3 of the Draft EIR. In addition, an Asbestos and Lead Based Paint Survey Report was completed to identify the building components that contained asbestos and lead-based paint. The Asbestos and Lead Based Paint Survey Report is provided in Appendix E-2 of the Draft EIR. These reports are summarized in Section 4.7, Hazards and Hazardous Materials of the Draft EIR.

The Project must comply with existing regulatory requirements (RRs) for the proper handling of hazardous wastes, including transportation, treatment, storage, and disposal; repair and/or removal of underground storage tanks based on applicable standards; and practices that would protect the demolition and construction crews from asbestos and lead exposure. In addition, the Project must incorporate mitigation measures (MMs) for the handling of suspected asbestos-containing materials and lead-based paint; an Operations and Maintenance Plan for regular inspection of any asbestos-containing materials; and testing and repair of underground storage tanks prior to use. Thus, existing hazardous materials and wastes would be removed from the Project site and future hazardous materials use would comply with applicable regulations to prevent hazards to future inmates. In summary, compliance with RR and implementation of MMs set forth in the Draft EIR would prevent public health and safety hazards to inmates, employees, visitors and other individuals at the Project site.

Zardeneta-3

Regarding the commenter's concern about increased traffic, Section 4.13, Transportation and Traffic, of the Draft EIR discusses potential impacts related to Project-generated traffic. The analysis indicates that increase in traffic volumes would not significantly impact local intersections (intersections would still operate at Level-of-Service D or better), or alternative transportation (Metrolink trains or Antelope Valley Transit Authority [AVTA] bus service), and impacts on California Department of Transportation (Caltrans) facilities would be less than significant. As discussed on page 4.13-23 and 4.13-24, the existing transit services in the area will adequately accommodate the increase of Project-generated transit trips. No mitigation is required for short-term construction or long-term operational traffic impacts.

Regarding the commenter's concern about increased air pollution, Section 4.2, Air Quality, presents the results of the emission analysis using California Emissions Estimator Model (CalEEMod) Version 2013.2.2. This computer program is used to calculate anticipated emissions associated with land development projects in California, including emissions from vehicles traveling to and from the Project site. As shown in Table 4.2-7 of Section 4.2, Air Quality, the estimated annual operational emissions due to Project-related operations would not exceed the Antelope Valley Air Quality Management District (AVAQMD) CEQA significance thresholds and potential impacts would be less than significant. In fact, emissions were well below the thresholds of significance. For example, carbon monoxide (CO) was the air contaminant with the highest annual rate of emission, and the Project was estimated to emit 18 tons per year, while the AVAQMD threshold of significance is 100 tons per year.

Zardeneta-4

This comment alleges that the EIR must assess alternatives to the Project, including alternatives to building a jail. The Draft EIR in fact addresses alternatives in accordance with CEQA (*California Public Resources Code*, Sections 21000 et seq.) and the State CEQA Guidelines (14 *California Code of Regulations* [CCR]). As demonstrated in Section 5.0, Project Alternatives, an EIR must describe a range of reasonable and of potentially feasible alternatives to the proposed Project, or to the location of the Project, which would feasibly attain most of the basic Project Objectives but would avoid or substantially lessen any significant effects. Based on the analyses in Sections 4.1 through 4.15 of the Draft EIR, the proposed Project would result in significant environmental effects prior to mitigation on a number of environmental topics. Following mitigation, however, impacts to all of these topical areas would be avoided or reduced to less than significant levels with the implementation of mitigation measures. No significant and unavoidable impacts would occur with the Project.

In addition, the Board of Supervisors has adopted numerous recent actions to reduce the number of people who are incarcerated in Los Angeles County, particularly those with mental illness and/or substance use disorders. The Board of Supervisors' 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 in a document entitled "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".

The Criminal Justice Mental Health Advisory Board report of August 2015 concluded that even with increased opportunities for diversion from a jail environment, there will still be a need for mental health treatment in jails, and that diversion efforts can reduce, but will not eliminate, the need for the County to operate detention facilities. In light of the County's diversion efforts, the

Board of Supervisors directed that, for purposes of on-going study and evaluation in the environmental review process, the maximum size of the proposed women's detention center at Mira Loma in Lancaster would remain at 1,604 beds. In addition the Board of Supervisors reduced the maximum proposed size by approximately 1,000 beds, for purposes of the environmental review of a separate proposed treatment and detention center addressing needs of incarcerated men and women with mental illness and/or substance use disorders at the site of the current Men's Central Jail in downtown Los Angeles. In summary, the Board of Supervisors has taken steps to reduce the number of people who are incarcerated in Los Angeles County.

In addition, please see the more detailed response on this issue in the response to Form Letter-1 regarding County actions relating to diversion and other out-of-custody alternatives, which is included in Section 2.3.1 of this Final EIR.

From: dianazunigacj@gmail.com [mailto:dianazunigacj@gmail.com] **On Behalf Of** Diana Zuniga
Sent: Friday, January 08, 2016 12:28 PM
To: ExecutiveOffice <executiveoffice@bos.lacounty.gov>; CEO Environmental <environmental@ceo.lacounty.gov>
Cc: FifthDistrict@lacbos.org; First District <firstdistrict@bos.lacounty.gov>; MarkRidley-Thomas@bos.lacounty.gov; sheila@bos.lacounty.gov; don@bos.lacounty.gov; Johnson, Derric <djohnson@bos.lacounty.gov>; Gold, Sherry <sgold@bos.lacounty.gov>; Polk, Benjamin <bpolk@bos.lacounty.gov>
Subject: Language access for Draft EIR for Proposed Women's Jail

Hello all

Happy New Year! Attached is a request regarding the Draft Environmental Impact Report (DEIR) for the proposed women's jail.

We had asked for the DEIR for the proposed women's jail to be translated into Spanish and for language interpretation at the community meeting. Neither were granted in December. We think it is really important given some of the community members we work with that can't access the document and voice their concerns.

At the state level when we were interacting with the environmental impact process for the Donovan Facility in San Diego they did not grant our request at first and then came back to us with the request fulfilled by translating the document, providing interpretation at an additional community meeting, and extending the public comment period for this purpose.

Zuniga-1

Please let me know if you have any questions or want to talk more.

Thanks,

--

Diana Zuñiga
Statewide Development and Membership Coordinator
1137 East Redondo Blvd.
Inglewood, CA 90302
Mail to: P.O. Box 73688
Los Angeles, CA 90003
[213-864-8931](tel:213-864-8931)
[Californians United for a Responsible Budget](http://californiansunited.org)
Diana@curbprisonspending.org
http://twitter.com/CURB_Prisons

[Become a monthly sustainer of CURB!](#)

Diana Zuniga (January 8, 2016)

Zuniga-1

In response to the commenter's request for Spanish translation of the Project's Draft EIR and Spanish interpreters at an additional public meeting, the Los Angeles County Chief Executive Office provided a responsive letter to Californian's United for a Responsible Budget (CURB), attention to Ms. Diana Zuniga on January 22, 2016. This letter was also sent to Marcela Hernandez of the Immigrant Youth Coalition, Claudia Bautista of the National Day Laborer Organizing Network, Felicia Gomez of the California Immigrant Policy Center, and Shiu-Ming Cheer of the National Immigration Law Center in response to similar requests. Follow up communications with Ms. Zuniga even before the notice of a new comment period confirmed the date of the second public meeting as February 9, 2016. The letter to CURB and others reads as follows:

We are responding to your letter dated Friday, January 8, 2016, addressed to the Los Angeles County Board of Supervisors. You requested a response regarding "whether the County will translate the Draft Environmental Impact Report (EIR) and hold another public meeting with Spanish interpreters available" with respect to the proposed Mira Loma Women's Detention Center Renovation Project (MLWDC) at Mira Loma in Lancaster.

We appreciate that you are following the review process for the proposed MLWDC project, and respond to your requests here. The County will voluntarily add additional outreach. We will hold a second community meeting in Lancaster to discuss the Draft EIR conclusions and process and invite submission of comments. Once the location and time of the meeting has been determined, a notice in English and Spanish will be provided via a similar notification process as the November 9, 2015, release of the Draft EIR. At this meeting, we will have real time Spanish language translation available, in the event members of the public request this service. Additionally, in light of the unique nature of this detention facility project, the County also will provide a written Spanish translation of the Executive Summary of the Draft EIR. That Draft EIR section summarizes the description, location and setting of the proposed MLWDC project, the project alternatives considered, the concerns raised during the scoping process, and the potential environmental impacts. The Executive Summary also provides the entire list of proposed Project Design Features, Regulatory Requirements and Mitigation Measures. This translation will be made available at the Quartz Hill and Lancaster Libraries, Los Angeles County Public Information Office, and online for download. The County will also provide additional time to accept public comments on the Draft EIR after the written translation is available.

Throughout the California Environmental Quality Act (CEQA) review process for the MLWDC project, the County has voluntarily broadened public outreach beyond what is legally required. As you are aware, the noticed CEQA comment period closed on January 12, 2016, after being open from November 9, 2015. The County voluntarily provided an extended comment period for more than the required 45 days, to avoid any inconvenience to commenters from the holidays occurring in the comment period.

As another example of the County's broad public outreach efforts, the original scoping period was noticed to include the public and interested stakeholders early

in the process, although that is not required by law. The County also held a noticed community meeting in the Lancaster community during the Draft EIR comment period, for anyone interested in learning more about the CEQA and public comment process. At that meeting, held on December 8, 2015, there was a presentation on the project description and the CEQA review and comment process. A number of speakers, including CURB, raised approximately 30 different questions at that meeting. No one attending that public community meeting asked for the assistance of a translator for themselves or others. Had they done so, County staff at the meeting would have assisted in Spanish translation.

Also, as you are aware, at the Board of Supervisors' regular meetings, Spanish translation services are available. We appreciate your comments and have responded with specific additional opportunities for public participation.

As stated above, the first of two public meetings was held to provide an overview of the Project and the conclusions of the Draft Environmental Impact Report (EIR) on Tuesday, December 8, 2015, from 6:00 PM to 8:00 PM at the James C. Gilley Lancaster National Soccer Center Eastside Activity Center at 43000 30th Street East in Lancaster, CA 93535. There were approximately 15 attendees at the first public meeting, and some submitted written comments. Attendance at this public meeting was voluntary and was not required to submit comments on the Draft EIR.

Subsequently, in January 2016, in response to requests from the public to provide an additional extension of the public review period and an additional public meeting, a *Notice of Extended Comment Period for the Draft Environmental Impact Report for the Mira Loma Women's Detention Center Project and Notice of Second Public Meeting in Lancaster, California* (Notice) was sent to the 2015 Notice of Availability (NOA) mailing list and email list, as well as additional mailing list contacts that had provided comment letters during the Draft EIR public review period up to the time of the mailing. This Notice extended the Draft EIR public review period from Monday, February 1, 2016, through Wednesday, March 2, 2016. This 30-day extension was in addition to the original 64-day Draft EIR public review period. All written comments received on the Draft EIR from Monday, November 9, 2015, through Wednesday, March 2, 2016, were responded to in this document. Therefore, the total Draft EIR public review period for which the County received and responded to comments was 114 days.

The Notice extending the public review period was provided in both English and Spanish. Additionally, the Executive Summary of the Draft EIR was translated into Spanish and posted on the County's website for viewing and downloading. Hardcopies of the Spanish-translated Executive Summary were made available, in addition to the Draft EIR, at the Quartz Hill and Lancaster Libraries, and the Los Angeles County Public Information Office. Newspaper advertisements of the extended comment period and second public meeting were placed in the following papers and ran on Monday, February 1, 2016:

- *Acton-Aqua Dolce News*: weekly publication so the ad was available for 7 days
- *Los Angeles Daily News*: a daily publication
- *La Opinion*: a daily publication (the ad was in both English and Spanish)
- *Antelope Valley Press*: a daily publication
- *Antelope Valley Times*: an online publication

The second public meeting was held on Tuesday, February 9, 2016, at the Lancaster Public Library at 601 West Lancaster Boulevard in Lancaster, CA 93534 to present an overview of the

proposed Project and the Draft EIR process and conclusions, and to invite submission of public comments on the Draft EIR. Real-time Spanish translation services were made available, as were copies of the Notice and the Executive Summary in both English and Spanish. This second public meeting had two attendees from the public. There were no requests for Spanish translation services at the public meeting.



MIRA LOMA WOMEN'S DETENTION CENTER PROJECT
PUBLIC MEETING- DECEMBER 8, 2015
6:00 TO 8:00 PM

COMMENTS:

I oppose the construction of any new jail that will continue to imprison any person of color. Also, people in the jail will be highly susceptible to illnesses such as valley fever. As a student of color, I am targeted by such jails, therefore there is enough jails in Southern California. NO MORE JAILS!

AA-1

AA-2

AA-3

NAME: _____

ADDRESS: _____

E-MAIL: _____

No Name Provided**AA-1**

The commenter describes himself or herself as a student of color who is targeted by jails and therefore opposes any jails that incarcerate any person of color. Purely social effects of a project are beyond the scope of CEQA analysis, which focuses on the proposal's effect on the physical environment.

AA-2

Regarding concerns about inmates and Valley Fever (i.e., coccidioidomycosis), its potential impact on potential future inmates and County staff is discussed in Section 4.2, Air Quality. A summary of hazards associated with the *Coccidioides* spores (i.e., the fungus that causes Valley Fever) is provided, and includes trends related to Valley Fever in Los Angeles County, as inventoried and reported by the Los Angeles County Department of Public Health (LACDPH), which was consulted during the preparation of the Draft EIR.

The Draft Environmental Impact Report (EIR) summarizes the LACDPH *2013 Annual Morbidity Report*, which presents the recent trends related to Valley Fever in Los Angeles County, including the increasing incidence rate within the last ten years. Data included in this report show the incidence in Valley Fever in Service Planning Area (SPA) 1 (i.e., Antelope Valley) from 2009 to 2013. The number of incidents of Valley Fever infection spiked in 2011 in SPA 1 with 93 reported cases, which represented 30 percent of cases in Los Angeles County, with an incidence rate of 25 per 100,000 people. The incidence rate decreased to 74 reported cases in both 2012 and 2013. As such, in 2013, SPA 1 represented approximately 20.4 percent of the total reported cases in Los Angeles County, with an incidence rate of 19 per 100,000 people. SPA 1 has the highest infection rate in Los Angeles County (LACDPH 2013).

However, the rate of Valley Fever infection in Los Angeles County, and the Antelope Valley specifically, is substantially less than in neighboring Kern County, which had a 2013 infection rate of 276 per 100,000 people in the north valley region (KCPHSD 2016). The eastern portion of San Luis Obispo County had Valley Fever infection rates ranging from 205 to 257 per 100,000 people in 2007-2012 (SLOCPHD 2014). Therefore, although the Antelope Valley has the highest rates in Los Angeles County, the rates are well below rates found nearby counties where Valley Fever is endemic.

The overall incidence rate of Valley Fever in the Antelope Valley was not determined to warrant changes in the County's protocol for disease prevention, notwithstanding the fact that the County health and public health officials are well educated on the condition; are familiar with its incidence in the County and elsewhere in the state and are involved in research and education on the subject of Valley Fever.

Also, as demonstrated in Section 4.2, Air Quality, the California Department of Corrections and Rehabilitation (CDCR) the CDCR has not identified the Lancaster area as being a geographic location that requires screening or interventions for the State prison population with regard to exposure to Valley Fever (CDCR 2013). Additionally, the LACDPH has not identified the previous U.S. Immigration and Customs Enforcement (ICE) detainee population at the MLDC, the future inmate population at the MLWDC, or earlier occupants at the High Desert Health System (HDHS) Multi-Ambulatory Care Center (MACC) (the adjacent hospital facility, which has relocated in Lancaster) as requiring the implementation of health screening protocols or other measures to address potential Valley Fever exposure.

The operation of the MLWDC will follow standard Sheriff's Department procedures for medical care and prevention with regard to health care for inmates in general, and Valley Fever specifically, and the Sheriff's Department will continue to coordinate with LACDPH (Masis 2015). The LACDPH is the designated County agency with the mandate to protect health, prevent disease, and promote the health and well-being of all persons within Los Angeles County. As such, any future changes in LACDPH policies that may be made regarding Valley Fever for inmate populations will be implemented, as applicable, throughout the County jail system.

The MLWDC property is not located in an area determined to be hazardous to the health of local residents or visitors to the region. The Draft EIR concludes that the potential future inmate population's temporary placement into the Antelope Valley, which includes the inmates' participation in all indoor and outdoor activities at the MLWDC, would not constitute placement into a hazardous existing environmental setting that would require mitigation. Additionally, the operation of the proposed Project would not increase the prevalence of Valley Fever spores or otherwise exacerbate an existing environmental condition.

AA-3

This comment relates to the merits of the proposed Project, and not the environmental analysis included in the Draft Environmental Impact Report (EIR) or the environmental impacts of the Project.

This Final EIR, including all comments submitted to the County on the Draft EIR, will be provided to the County of Los Angeles Board of Supervisors. Therefore, your concerns will be presented directly to the decision makers prior to consideration of Project approval.



MIRA LOMA WOMEN'S DETENTION CENTER PROJECT
PUBLIC MEETING- DECEMBER 8, 2015
6:00 TO 8:00 PM

COMMENTS:

I don't Believe in Building more Jails,
In my opinion Jails are harmful
for Human beings, It affects
people, Jails don't Better people.

} X-1

NAME: Shin X.
ADDRESS: _____
E-MAIL: _____

-X.

X-1

Although the Project site has been unoccupied since 2012 as discussed in Section 2.0, Environmental Setting, the Project site has generally been in operation and providing various detention/jail functions from 1945-1946 until 2012. The MLWDC Project proposes the adaptive reuse, renovation, and expansion of the majority of the buildings at the MLDC, which is an existing County asset. The redevelopment of the property would avoid the costs associated with constructing a new facility.

This comment relates to the merits of the proposed Project and not the environmental analysis included in the Draft Environmental Impact Report (EIR) or the environmental impacts of the Project. This Final EIR, including all comments submitted to the County on the Draft EIR, will be provided to the County of Los Angeles Board of Supervisors. Therefore, your concerns will be presented directly to the decision makers prior to consideration of Project approval.

This page intentionally left blank

SECTION 3.0 MITIGATION MONITORING AND REPORTING PROGRAM

Section 21081.6 of CEQA and Section 15097 of the State CEQA Guidelines require a public agency to adopt a Mitigation Monitoring and Reporting Program (MMRP) for assessing and ensuring the implementation of required mitigation measures applied to proposed projects. Specific reporting and/or monitoring requirements that will be enforced during project implementation shall be adopted simultaneously with final Project approval by the responsible decision makers.

The MMRP for the Mira Loma Women's Detention Center (MLWDC) includes Mitigation Measures (MMs) that will reduce or avoid significant environmental effects associated with Project implementation. For ease of reference, the MMRP also includes the Project Design Features (PDFs) and Regulatory Requirements (RRs) that are applicable to the Project and will reduce potential environmental impacts. The PDFs and RRs are included in the MMRP for convenience as only MMs are required to be in the MMRP.

The PDFs, RRs, and MMs for the MLWDC are listed in the first column in Table 1 below, along with the timeframe for implementation of the PDF, RR, or MM in the second column, the agency or party with primary responsibility for implementing the PDF, RR or MM in the third column, and the agency or party with responsibility for monitoring compliance in the fourth column. Implementation of the PDFs, RRs and MMs for the MLWDC would primarily be the responsibility of the County of Los Angeles, as the Lead Agency under CEQA, and its consultants/contractors.

**TABLE 3-1
MITIGATION MONITORING AND REPORTING PROGRAM**

Mitigation Measures	Mitigation Timing	Responsible Agency/Party	Monitoring Agency/Party
Aesthetics (Section 4.1 of the EIR)			
RR AES-1: Proposed off-site improvements within the public right-of-way will comply with applicable standards in the City of Lancaster's <i>Design Guidelines</i> as they relate to streetscape design for sidewalks and parkways.	Prior to approval of final designs	Design-Builder	County of Los Angeles Department of Public Works and City of Lancaster
MM AES-1 A Lighting Plan shall be prepared that depicts the locations of lighting fixtures, types of fixtures, mounting heights, and aiming directions to be installed on the Project site. The Lighting Plan shall ensure that sensitive receptors on adjacent properties would not be significantly adversely affected by light spillover, while also ensuring that lighting levels meet the security requirements for the MLWDC. The Lighting Plan shall be provided to the Los Angeles County Director of Public Works (DPW) to confirm its findings prior to the commencement of any on-site or off-site demolition/construction activities. Upon approval of the Lighting Plan by DPW, the Project shall be implemented in compliance with the Plan.	Prior to commencement of any on-site or off-site demolition/construction activities	Design-Builder	County of Los Angeles Department of Public Works
Air Quality (Section 4.2 of the EIR)			
PDF AIR-1 The following administrative controls and hazard awareness actions will be included in the Contractor's Specifications: <ol style="list-style-type: none"> 1. Prior to Project construction initiation, and for any personnel additions after Project construction initiation, the County's contractor shall be informed of the following California Department of Public Health (CDPH) materials on Valley Fever, or any updated materials as applicable, will be distributed to worksite supervisors: <ol style="list-style-type: none"> i. CDPH pamphlet entitled "Preventing Work-Related Coccidioidomycosis (Valley Fever)" available at: http://www.cdph.ca.gov/programs/hesis/Documents/CocciFact.pdf (CDPH 2013a). 2. Prior to Project construction initiation, and for any personnel additions after Project construction initiation, the County's contractor shall be informed of the following 	Prior to approval of contractor's specifications and Prior to commencement of construction activities	Design-Builder	County of Los Angeles Department of Public Works

**TABLE 3-1
MITIGATION MONITORING AND REPORTING PROGRAM**

Mitigation Measures	Mitigation Timing	Responsible Agency/Party	Monitoring Agency/Party
<p>CDPH materials on Valley Fever, as well as any updated materials as applicable, will be distributed to construction workers:</p> <ul style="list-style-type: none"> i. CDPH pamphlet entitled "Valley Fever Fact Sheet" available at: http://www.cdph.ca.gov/HealthInfo/discond/Documents/VFGeneral.pdf (CDPH 2013b). ii. CDPH pamphlet entitled "Hoja de datos de la Fiebre del Valle (Valley Fever Fact Sheet in Spanish)" available at: http://www.cdph.ca.gov/HealthInfo/discond/Documents/HojaDeDatosDeLaFiebreDelValle.pdf (CDPH 2013c). iii. CDPH pamphlet entitled "Fact Sheet ng Valley Fever (Valley Fever Fact Sheet in Tagalog)," available at: http://www.cdph.ca.gov/HealthInfo/discond/Documents/TagalogGeneralValleyFeverFactSheet.pdf (CDPH 2013d). 			
<p>PDF AIR-2 The Contractor's Specifications will be required to comply with County's Specifications No. 7266, which require best management practices for construction activities. These Best Management Practices include:</p> <ul style="list-style-type: none"> • Eroded sediments and other pollutants must be retained on site and may not be transported from the site via sheetflow, swales, area drains, natural drainage courses or wind. • Stockpiles of earth and other construction related materials must be protected from being transported from the site by the forces of wind or water. • Fuels, oils, solvents and other toxic materials must be stored in accordance with their listing and are not to contaminate the soil and surface waters. All approved storage containers are to be protected from the weather. Spills must be cleaned up immediately and disposed of in a proper manner. Spills may not be washed into the drainage system. • Excess or waste concrete may not be washed into the public way or any other drainage system. Provisions shall be made to retain concrete waste on sites until they can be disposed of as solid waste. 	<p>Prior to approval of contractor's specifications and During construction activities</p>	<p>Design-Builder</p>	<p>County of Los Angeles Department of Public Works</p>

**TABLE 3-1
MITIGATION MONITORING AND REPORTING PROGRAM**

Mitigation Measures	Mitigation Timing	Responsible Agency/Party	Monitoring Agency/Party
<ul style="list-style-type: none"> • Trash and construction related solid wastes must be deposited into a covered receptacle to prevent contamination of rainwater and dispersal by wind. • Sediments and other materials may not be tracked from the site by vehicle traffic. The construction entrance roadways must be stabilized so as to inhibit sediments from being deposited into the public way. Accidental depositions must be swept up immediately and may not be washed down by rain or other means. • Any slopes with disturbed soils or denuded of vegetation must be stabilized so as to inhibit erosion by wind and water. 			
<p>PDF AIR-3 The Contractor's Specifications will require that on-site gardening features be constructed within raised beds only and will be filled with imported soils derived from outside the Antelope and Kern Valleys so that inmates would not be interacting directly with local soils.</p>	<p align="center">Prior to approval of contractor's specifications and Ongoing, throughout operations</p>	<p align="center">Design-Builder</p>	<p align="center">County of Los Angeles Department of Public Works and County of Los Angeles Sheriff's Department</p>
<p>RR AIR-1 All construction activities will be conducted in compliance with any applicable AVAQMD rules and regulations, including but not limited to the following:</p> <ul style="list-style-type: none"> • Rule 403, Fugitive Dust, for controlling fugitive dust and avoiding nuisance. • Rule 402, Nuisance, which states that a Project shall not "discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property". • Rule 1113, which limits the volatile organic compound content of architectural coatings. • Rules 201, 203 and 219, which regulate permits for installation and use of equipment that may generate air contaminants, such of commercial kitchen equipment and emergency generators. 	<p align="center">During construction activities</p>	<p align="center">Design-Builder</p>	<p align="center">County of Los Angeles Department of Public Works</p>

**TABLE 3-1
MITIGATION MONITORING AND REPORTING PROGRAM**

Mitigation Measures	Mitigation Timing	Responsible Agency/Party	Monitoring Agency/Party
RR AIR-2 All construction activities will be conducted in compliance with Department of Health - Infection Control Policy Guidelines Procedure No. 918.01, which requires that building additions, demolition, retrofit, alterations, new construction comply with the Infection Control Policy.	During construction activities	Design-Builder	County of Los Angeles Department of Public Works
RR AIR-3 All construction activities will be conducted in compliance with 13 CCR §2485, which requires that all diesel-fueled commercial motor vehicles must not idle for more than 5 consecutive minutes at any location.	During construction activities	Design-Builder	County of Los Angeles Department of Public Works
Biological Resources (Section 4.3 of the EIR)			
MM BIO-1 Prior to commencement of construction activities, a qualified Biologist shall conduct a pre-construction bat habitat assessment of the trees and/or structures marked for potential removal/demolition. Potential for roosting shall be categorized by (1) potential for solitary roost sites and (2) potential for colonial roost sites (i.e., ten bats or more). If the potential for colonial roosting is determined, those trees/structures shall not be removed during the bat maternity roost season (March 1 to July 31). Trees potentially supporting colonial roosts outside the maternity roost season, and trees potentially supporting solitary roosts, may be removed via a two-step removal process whereby, at the direction of the Biologist, some level of disturbance (such as trimming of lower branches) is applied to the tree on the day prior to removal to allow bats to escape during the darker hours, and the roost tree shall be removed the following day (i.e., there shall be no less or more than one night between initial disturbance and the grading or tree removal). Structures potentially supporting colonial roosts outside the maternity roost season and structures potentially supporting solitary roosts may be fitted with a bat exclusionary device at the entry location, whereby bats are allowed to leave the structure but are unable to return. The structure can be demolished the following day. The results of the pre-construction bat habitat assessment, and any measures taken to protect bats, shall be documented and provided to the Los Angeles County Department of Public Works.	Prior to commencement of construction activities	Biologist	County of Los Angeles Department of Public Works

**TABLE 3-1
MITIGATION MONITORING AND REPORTING PROGRAM**

Mitigation Measures	Mitigation Timing	Responsible Agency/Party	Monitoring Agency/Party
<p>MM BIO-2 The Project shall be conducted in compliance with the conditions set forth in the Migratory Bird Treaty Act (MBTA) and California Fish and Game Code with methods accepted by the U.S. Fish and Wildlife Service (USFWS) and the California Department of Fish and Wildlife (CDFW) to protect active bird/raptor nests. To the extent feasible, vegetation/tree removal shall occur during the non-breeding season for nesting birds (generally late September to early March) and nesting raptors (generally early July to late January) to avoid impacts to nesting birds and raptors. If the nature of the Project requires that work be initiated during the breeding season for nesting birds and raptors (February 1 to August 31), a pre-construction survey shall be conducted by a qualified Biologist (i.e. one with experience conducting nesting bird surveys) for nesting birds and raptors within 3 days prior to clearing of any vegetation and/or any work near existing structures (i.e., within 300 feet for nesting birds, within 300 feet for nesting special status birds, and within 500 feet for nesting raptors). If the Biologist does not find any active nests within or immediately adjacent to the impact area, the vegetation clearing/construction work shall be allowed to proceed. A letter report shall be prepared and submitted to the Los Angeles County Department of Public Works to document the survey findings and recommended protective measures.</p> <p>If the Biologist finds an active nest within or immediately adjacent to the construction area and determines that the nest may be impacted or breeding activities substantially disrupted, the Biologist shall delineate an appropriate buffer zone around the nest depending on the sensitivity of the species and the nature of the construction activity. Any nest found during survey efforts shall be mapped on the construction plans. The active nest shall be protected until nesting activity has ended. To protect any nest site, the following restrictions to construction activities shall be required until nests are no longer active, as determined by a qualified Biologist: (1) clearing limits shall be established within a buffer around any occupied nest (the buffer shall be 25–300 feet for nesting birds and 300–500 feet for nesting raptors), unless otherwise determined by a qualified Biologist and (2) access and surveying shall be restricted within the buffer of any occupied nest, unless otherwise determined by a qualified Biologist.</p>	<p>Completed within 3 days prior to vegetation clearing and During construction activities, if nesting birds are present</p>	<p>Biologist</p>	<p>County of Los Angeles Department of Public Works</p>

**TABLE 3-1
MITIGATION MONITORING AND REPORTING PROGRAM**

Mitigation Measures	Mitigation Timing	Responsible Agency/Party	Monitoring Agency/Party
<p>Encroachment into the buffer area around a known nest shall only be allowed if the Biologist determines that the proposed activity would not disturb the nest occupants. Flagging, stakes, and/or construction fencing shall be used to demarcate the buffer around the nest and construction personnel shall be instructed as to the sensitivity of the area. Construction will be allowed to proceed when the qualified Biologist has determined that fledglings have left the nest or the nest has failed.</p>			
<p>MM BIO-3 If MLWDC implementation, including potential off-site trenching for the water line connection (temporary) and/or off-site construction of a storm drain outlet (permanent), would result in discharge to jurisdictional features, the County shall consult with the CDFW and the RWQCB to determine if the agency will consider the feature to be within their jurisdiction and require regulatory permits. If an agency indicates that the feature will not be regulated and no permit is required, no further action will be required for that agency. If an agency indicates that the feature will be regulated and permits are required, the balance of this Mitigation Measure, described below, shall be implemented prior to initiation of Project activities.</p> <p>Prior to initiation of Project activities, the County shall obtain any necessary permits for impacts to Regional Water Quality Control Board (RWQCB) and CDFW jurisdictional areas. Mitigation for the loss of jurisdictional resources shall be negotiated with the resource agencies during the regulatory permitting process. Potential mitigation options shall include one or more of the following: (1) payment to a mitigation bank or regional riparian enhancement program (e.g., invasive plant or wildlife species removal) and/or (2) restoration of riparian habitat either on site or off site at a ratio of no less than 1:1, determined through consultation with the above-listed resource agencies. If in-lieu mitigation fees are required, prior to the initiation of any construction-related activities, the LACFCD shall pay the in-lieu mitigation fee to a mitigation bank/enhancement program for the in-kind (equivalent vegetation type and acreage) replacement of impacted jurisdictional resources. If a Restoration Program is required, prior to the initiation of any construction-related activities, LACFCD shall prepare and submit a Riparian Habitat Mitigation</p>	<p>Prior to off-site trenching for water line connection and storm drain outlet construction</p>	<p>County of Los Angeles Department of Public Works and Biologist, if required</p>	<p>County of Los Angeles Department of Public Works</p>

**TABLE 3-1
MITIGATION MONITORING AND REPORTING PROGRAM**

Mitigation Measures	Mitigation Timing	Responsible Agency/Party	Monitoring Agency/Party
<p>and Monitoring Program (HMMP) for USACE and CDFW approval. If a Riparian HMMP is required, it shall contain the following items:</p> <ul style="list-style-type: none"> A. Responsibilities and qualifications of the personnel to implement and supervise the plan. The responsibilities of the Landowner, Specialists, and Maintenance Personnel that would supervise and implement the plan shall be specified. B. Site selection. The mitigation site shall be determined in coordination with the USACE, CDFW, and RWQCB. The site shall either be located in a dedicated open space area on County land, USFS land, or off-site land shall be purchased. C. Seed source. Seeds (or plantings) used shall be from local sources (within ten miles of the Project area) to ensure genetic integrity. D. Site preparation and planting implementation. Site preparation shall include (1) protection of existing native species; (2) trash and weed removal; (3) native species salvage and reuse (i.e., duff); (4) soil treatments (i.e., imprinting, decompacting); (5) temporary irrigation installation; (6) erosion-control measures (i.e., rice or willow wattles); (7) seed mix application; and (8) container species planting. E. Schedule. A schedule shall be developed which includes planting in late fall and early winter, between October 1 and January 30. F. Maintenance Plan/Guidelines. The Maintenance Plan shall include (1) weed control; (2) herbivory control; (3) trash removal; (4) irrigation system maintenance; (5) maintenance training; and (6) replacement planting. G. Monitoring plan. The Monitoring Plan shall include (1) qualitative monitoring (i.e., photographs and general observations); (2) quantitative monitoring (i.e., randomly placed transects); (3) performance criteria, as approved by the above-listed resource agencies; (4) monthly reports for the first year and reports quarterly thereafter; and (5) annual reports for five years, which shall be submitted to the resource agencies on an annual basis. The site shall be monitored and maintained for five years to ensure successful 			

**TABLE 3-1
MITIGATION MONITORING AND REPORTING PROGRAM**

Mitigation Measures	Mitigation Timing	Responsible Agency/Party	Monitoring Agency/Party
<p>establishment of riparian habitat within the restored and created areas.</p> <p>H. Long-term preservation. Long-term preservation of the site shall also be outlined in the conceptual Mitigation Plan to ensure the mitigation site is not impacted by future development.</p>			
Cultural Resources (Section 4.4 of the EIR)			
<p>PDF CUL-1 The Project site boundaries, as defined, exclude the two hangars, which have been previously evaluated and appear eligible for listing in the National Register of Historic Places (NRHP). The Contractor's Specifications will require that none of the Polaris Flight Academy Historic District's contributing buildings or structures would be impacted by the Project.</p>	<p>Prior to approval of contractor's specifications and During construction activities</p>	<p>Design-Builder</p>	<p>County of Los Angeles Department of Public Works</p>
<p>RR CUL-1 All construction activities will be conducted in accordance with Section 7050.5 of the California Health and Safety Code regarding the potential discovery of human remains. If applicable, the Native American Heritage Commission (NAHC) will be responsible for designating the most likely descendant (MLD), as required by Section 5097.98 of the California Public Resources Code. If the landowner rejects the recommendations of the MLD, the burial location would be determined in compliance with California Public Resources Code, Section 5097.98.</p>	<p>During ground disturbance (e.g., grading, trenching or excavation activities)</p>	<p>Design-Builder</p>	<p>County of Los Angeles Department of Public Works Archaeologist and Native American Heritage Commission, if applicable</p>
<p>MM CUL-1 Prior to the start of construction activities, a qualified Archaeologist shall be retained by the County to attend the pre-grading meeting with the construction contractor to establish, based on the site plans, appropriate procedures for monitoring earth-moving activities during construction. The Archaeologist shall determine, based on consultation with the County, when monitoring of grading activities is needed. Monitoring should observe disturbance in the uppermost layers of sediment including the younger Quaternary Alluvium (i.e. approximately 5 feet below ground surface or shallower) and if any archaeological resources are discovered, construction activities must cease within 50 feet of the discovery, as appropriate, and they shall be protected from further disturbance until the qualified Archaeologist evaluates them using standard archaeological protocols. The Archaeologist must first</p>	<p>Pre-grade meeting orientation and During grading and excavation activities, if needed</p>	<p>Archaeologist</p>	<p>County of Los Angeles Department of Public Works</p>

**TABLE 3-1
MITIGATION MONITORING AND REPORTING PROGRAM**

Mitigation Measures	Mitigation Timing	Responsible Agency/Party	Monitoring Agency/Party
<p>determine whether an archaeological resource uncovered during construction is a "Tribal Cultural Resources" pursuant to Section 21074 of the California Public Resources Code, or a "unique archaeological resource" pursuant to Section 21083.2(g) of the California Public Resources Code or a "historical resource" pursuant to Section 15064.5(a) of the State CEQA Guidelines. If the archaeological resource is determined to be a "Tribal Cultural Resource", "unique archaeological resource" or a "historical resource", the Archaeologist shall formulate a Mitigation Plan in consultation with the County of Los Angeles that satisfies the requirements of the above-listed Code Sections. Upon approval of the Mitigation Plan by the Los Angeles County Director of Public Works (DPW), the Project shall be implemented in compliance with the Plan.</p> <p>If the Archaeologist determines that the resource is not a "Tribal Cultural Resource", "unique archaeological resource" or "historical resource," s/he shall record the site and submit the recordation form to the California Historical Resources Information System (CHRIS) at the South Central Coastal Information Center (SCCIC). The Archaeologist shall prepare a report of the results of any study prepared as part of a testing or mitigation plan, following accepted professional practice. The report shall follow guidelines of the California Office of Historic Preservation. Copies of the report shall be submitted to the County and to the CHRIS at the SCCIC at the California State University, Fullerton.</p>			
<p>MM CUL-2 Prior to the start of ground disturbing activities in native soils, a qualified Paleontologist shall be notified and retained when earth-moving activities are anticipated to impact undisturbed deposits in the older Quaternary alluvium on the Project site (i.e. approximately 5 feet below ground surface or deeper). The designated Paleontologist shall be present during the pre-grade meeting to discuss paleontological sensitivity and to assess whether scientifically important fossils have the potential to be encountered. The Paleontologist shall determine, based on consultation with the County, when monitoring of grading activities is needed based on the on-site soils and final grading plans.</p> <p>All paleontological work to assess and/or recover a potential resource at the Project site shall be conducted under the direction of the qualified Paleontologist. If any fossil remains are uncovered</p>	<p>Prior to the commencement of ground-disturbing activities in native soils and During excavation activities in native soils deeper than five feet below ground surface</p>	<p>Paleontologist</p>	<p>County of Los Angeles Department of Public Works</p>

**TABLE 3-1
MITIGATION MONITORING AND REPORTING PROGRAM**

Mitigation Measures	Mitigation Timing	Responsible Agency/Party	Monitoring Agency/Party
<p>during earth-moving activities, all heavy equipment shall be diverted at least 50 feet from the fossil site until the monitor has had an opportunity to examine the remains and determines that earthmoving can resume. The extent of land area that is prohibited from disturbance shall be at the discretion of the Paleontological monitor. Samples of older Quaternary alluvium shall be collected as necessary for processing and shall be examined for very small vertebrate fossils. The Paleontologist shall prepare a report of the results of any findings following accepted professional practice.</p>			
Geology and Soils (Section 4.5 of the EIR)			
<p>RR GEO-1 The Project will be designed and constructed in accordance with the Los Angeles County's Building Code, which adopts the California Building Code (CBC), which is based on the International Building Code (IBC). New construction, alteration, or rehabilitation shall comply with applicable ordinances set forth by the County and/or by the most recent County building and seismic codes in effect at the time of project design. In accordance with Section 1803.2 of the 2013 CBC, a geotechnical investigation is required that must evaluate soil classification, slope stability, soil strength, position and adequacy of load-bearing soils, the effect of moisture variation on soil-bearing capacity, compressibility, liquefaction, and expansiveness, as necessary, determined by the County Building Official. The geotechnical investigation must be prepared by registered professionals (i.e., California Registered Civil Engineer or Certified Engineering Geologist). Recommendations of the report, as they pertain to structural design and construction recommendations for earthwork, grading, slopes, foundations, pavements, and other necessary geologic and seismic considerations, must be incorporated into the design and construction of the Project.</p>	<p>Prior to approval of final site plans and During construction activities</p>	<p>Design-Builder</p>	<p>County of Los Angeles Department of Public Works</p>
Greenhouse Gas Emissions (Section 4.6 of the EIR)			
<p>PDF GHG-1 Up to 1 megawatt (MW) of the Project's electricity demands will be offset through the County's existing 2-megawatt (MW) solar energy facility located immediately east of the Project site. The Contractor's Specifications will require that this County-owned renewable energy source will off-set the Project's electrical</p>	<p>Prior to approval of contractor's specifications and</p>	<p>Design-Builder</p>	<p>County of Los Angeles Department of Public Works</p>

**TABLE 3-1
MITIGATION MONITORING AND REPORTING PROGRAM**

Mitigation Measures	Mitigation Timing	Responsible Agency/Party	Monitoring Agency/Party
demands throughout construction as well as long-term operations.	During construction activities		
PDF GHG-2 The Contractor's Specifications will require that the Project will provide a combined minimum of 34 video-visiting stations on-site, along with video interview rooms in transitional housing buildings.	Prior to approval of contractor's specifications and During construction activities	Design-Builder	County of Los Angeles Department of Public Works
PDF GHG-3 The Project site will have the Antelope Valley Transit Authority (AVTA) bus and Metrolink schedules posted, as well as the locations of the nearest Park-and-Ride lots, in areas visible to visitors and in the Staff Services building to encourage the use of public transportation by staff and visitors. AVTA bus and Metrolink schedule information will be updated to ensure accuracy.	Prior to issuance of occupancy permit and Ongoing, every six months thereafter	County of Los Angeles Sheriff's Department	County of Los Angeles Sheriff's Department
PDF GHG-4 The Contractor's Specifications will require that the Project will incorporate (1) a secure storage area for staff to store bicycles into the Project design plans that allow for the individual locking of bicycles and protection from sun and inclement weather, and (2) bicycle rack(s) adjacent to the Visitor Parking Lot that allows for the individual locking of bicycles.	Prior to approval of contractor's specifications and During construction activities	Design-Builder	County of Los Angeles Department of Public Works
RR GHG-1 The Project will be designed and constructed in accordance with the Los Angeles County Code (Title 22, Section 22.52.2130), which requires that all new buildings that are greater than 10,000 square feet (sf) and less than 25,000 sf in area will be designed and constructed to achieve the equivalency of a Leadership in Energy and Environmental Design (LEED™) certification; buildings of 25,000 sf or greater will achieve the equivalency of a LEED Silver certification. The Project will comply with Title 22 (Section 22.52.2200 et seq., Drought Tolerant Landscaping; and Section 22.52.2100, Green Building).	Prior to approval of contractor's specifications and During construction activities	Design-Builder	County of Los Angeles Department of Public Works
RR GHG-2 The Project will be designed and constructed in accordance with the California Code of Regulations, Title 24 Building Energy Efficiency Program, which establishes a minimum level of building energy efficiency and requires energy efficient measures, including ventilation, insulation, and construction and the use of energy-saving appliances, conditioning systems, water heating, and lighting.	Prior to approval of contractor's specifications and During construction activities	Design-Builder	County of Los Angeles Department of Public Works

**TABLE 3-1
MITIGATION MONITORING AND REPORTING PROGRAM**

Mitigation Measures	Mitigation Timing	Responsible Agency/Party	Monitoring Agency/Party
RR GHG-3 The Project will be designed and constructed in accordance with the Los Angeles County Code (Title 31, including but not limited to, Section 301.2.1 Low-rise Residential Buildings, and Section 301.3.1, Nonresidential Buildings greater than or equal to 25,000 square feet.), Section 4.106.5, Landscape Design, and Section 5.106.3, Low Impact Development or the current County code requirements in place at the time of Project design and construction. Title 31 requires project designs and practices that will result in the conservation of water and energy resources, such as measures for building commissioning, clean vehicle parking, and solid waste recycling.	Prior to approval of contractor's specifications and During construction activities	Design-Builder	County of Los Angeles Department of Public Works
RR GHG-4 The Project will include an Employee Commute Reduction Plan (ECRP), commonly known as the Rideshare Plan, in accordance with Los Angeles County Code Chapter 5.9, Vehicle Trip Reduction. The ECRP will specify the measures to be implemented at MLWDC to achieve the target average vehicle ridership performance goal for employee vehicles subject to the Ordinance.	Prior to issuance of occupancy permit	County of Los Angeles Sheriff's Department	County of Los Angeles Sheriff's Department
RR GHG-5 The Project will be subject to any project direction adopted by the Board of Supervisors based upon the findings of the Advisory Board's evaluation of strategies to reduce negative impacts of operating the MLWDC away from the downtown Los Angeles area, including contract transportation for visitors, videoconferencing for attorney consultation, and reviewing national best practices for visiting and family reunification.	Ongoing, throughout operations	Gender Responsive Advisory Committee	County of Los Angeles Sheriff's Department
Hazards and Hazardous Materials (Section 4.7 of the EIR)			
RR HAZ-1 Any Project-related hazardous materials and hazardous wastes will be transported to and/or from the Project in compliance with any applicable State and federal requirements, including the U.S. Department of Transportation regulations listed in the Code of Federal Regulations (Title 49, Hazardous Materials Transportation Act); California Department of Transportation (Caltrans) standards; and the California Occupational Safety and Health Administration (CalOSHA) standards.	During construction activities	Design-Builder	County of Los Angeles Department of Public Works

**TABLE 3-1
MITIGATION MONITORING AND REPORTING PROGRAM**

Mitigation Measures	Mitigation Timing	Responsible Agency/Party	Monitoring Agency/Party
<p>RR HAZ-2 Any Project-related hazardous waste generation, transportation, treatment, storage, and disposal will be conducted in compliance with the Subtitle C of the Resource Conservation and Recovery Act (RCRA) (Code of Federal Regulations, Title 40, Part 263), including the management of non-hazardous solid wastes and underground tanks storing petroleum and other hazardous substances. The Project will be designed and constructed in accordance with the regulations of the Los Angeles County Fire Department, which serves as the designated CUPA and which implements State and federal regulations for the following programs: (1) Hazardous Waste Generator Program, (2) Hazardous Materials Release Response Plans and Inventory Program, (3) CalARP, (4) AST Program, and (5) UST Program.</p>	<p>Prior to approval of final designs and During construction activities</p>	<p>Design-Builder</p>	<p>County of Los Angeles Department of Public Works and County of Los Angeles Fire Department, as the CUPA, if required</p>
<p>RR HAZ-3 Any Project-related underground storage tank (UST) repairs and/or removals will be conducted in accordance with the California Underground Storage Tank Regulations (Title 23, Chapter 16 of the California Code of Regulations). Any unauthorized release of hazardous materials will require release reporting, initial abatement, and corrective actions that will be completed with oversight from the RWQCB, DTSC, LACFD, SCAQMD and/or other regulatory agencies, as necessary. Any Project-related use of existing USTs will also have to be conducted (i.e., used, maintained and monitored) in accordance with the California Underground Storage Tank Regulations (Title 23, Chapter 16 of the California Code of Regulations).</p>	<p>During construction activities</p>	<p>County of Los Angeles Sheriff's Department</p>	<p>County of Los Angeles Sheriff's Department and County of Los Angeles Fire Department, as the CUPA, if required</p>
<p>RR HAZ-4 Any Project-related demolition activities that have the potential to expose construction workers and/or the public to asbestos-containing materials (ACMs) or lead-based paint (LBP) will be conducted in accordance with applicable regulations, including, but not limited to:</p> <ul style="list-style-type: none"> • Antelope Valley Air Quality Management District's (AVAQMD's) Rule 1403 • California Health and Safety Code (Section 39650 et seq.) • California Code of Regulations (Title 8, Section 1529) • California Occupational Safety and Health Administration (CalOSHA) regulations (California Code of Regulations, Title 8, Section 1529 [Asbestos] and Section 1532.1 [Lead]) 	<p>During demolition activities</p>	<p>Design-Builder</p>	<p>County of Los Angeles Department of Public Works</p>

**TABLE 3-1
MITIGATION MONITORING AND REPORTING PROGRAM**

Mitigation Measures	Mitigation Timing	Responsible Agency/Party	Monitoring Agency/Party
RR HAZ-5 Any Project-related new construction, excavations, and/or new utility lines within 10 feet or crossing existing high pressure pipelines, natural gas/petroleum pipelines, electrical lines greater than 60,000 volts, will be designed and constructed in accordance with the California Code of Regulations (Title 8, Section 1541).	During construction activities	Design-Builder	County of Los Angeles Department of Public Works
RR HAZ-6 The Project will be designed and constructed in accordance with Part 77 of the Federal Aviation Regulations (FAR), which requires the County to notify the Federal Aviation Administration of proposed construction or alteration within 20,000 feet from the nearest point of the nearest runway of an airport where the structure would extend into a slope of a 100:1 and within 5,000 feet of a heliport where the structure would extend into a slope of a 25:1 from the nearest landing and take-off area of the heliport.	Prior to approval of final designs and During construction activities	Design-Builder	County of Los Angeles Department of Public Works
RR HAZ-7 The radio communications tower shall be subject to review by the Los Angeles County Airport Land Use Commission for compliance with the General William J. Fox Airfield Land Use Compatibility Plan.	Prior to approval of final designs	County of Los Angeles Department of Public Works	County of Los Angeles Department of Public Works and Los Angeles County Airport Land Use Commission
MM HAZ-1 In the event that building materials are encountered during construction activities that are suspected of being asbestos-containing materials (ACMs), these materials shall be assumed to contain asbestos and shall be handled, removed, transported and/or disposed in accordance with applicable ACM regulations, until such time that they can be sampled and evaluated for asbestos content. Prior to Project occupancy, an Operations and Maintenance (O&M) Plan shall be prepared by a CalOSHA-certified Asbestos Consultant and implemented by building maintenance staff who have undergone at least 16 hours of asbestos O&M training. The O&M Plan shall be subject to review and approval by the County of Los Angeles Director of Public Works and shall require periodic observation, inspection, and documentation by designated staff to ensure that ACMs do not become damaged and do not result in airborne asbestos fiber release. Any required removal of asbestos shall be made under the direction of a CalOSHA Certified Asbestos Consultant.	During construction activities and Prior to issuance of occupancy permit and Ongoing, throughout operations	Design-Builder and CalOSHA-certified Asbestos Consultant and County of Los Angeles Sheriff's Department	County of Los Angeles Department of Public Works and County of Los Angeles Sheriff's Department

**TABLE 3-1
MITIGATION MONITORING AND REPORTING PROGRAM**

Mitigation Measures	Mitigation Timing	Responsible Agency/Party	Monitoring Agency/Party
MM HAZ-2 In the event that painted or ceramic surfaces materials are encountered during construction activities that are suspected of containing lead and/or lead-based paint, these materials shall be assumed to contain lead in concentrations exceeding the Los Angeles County Department of Health Services' definition of 0.7 milligrams per square centimeter (mg/cm ² , or 600 parts per million) and shall be handled, removed, transported and/or disposed in accordance with applicable regulations for lead content, until such time that they can be sampled and evaluated for lead content.	During construction activities	Design-Builder	County of Los Angeles Department of Public Works
MM HAZ-3 Prior to the use of the off-site fueling station by any Project-related activities, including any construction activities, the underground storage tanks (USTs) at the off-site fueling station shall be tested and repaired as necessary, subject to inspection and approval by the Los Angeles County Fire Department, as the Certified Unified Program Agency (CUPA).	Prior to the use of the off-site fueling station	County of Los Angeles Department of Public Works	County of Los Angeles Department of Public Works and County of Los Angeles Fire Department, as the CUPA, if required
Hydrology and Water Quality (Section 4.8 of the EIR)			
PDF HYD-1 The Contractor's Specifications will require that the Project will be designed and constructed in accordance with the following requirements of the Los Angeles County Department of Public Works for the incorporation of source-control, site-design, and treatment-control BMPs to reduce pollutants in the storm water and to reduce runoff rates and volumes to match existing conditions: <ul style="list-style-type: none"> • 2002 Standard Urban Stormwater Mitigation Plan (SUSMP) • 2006 Hydrology Manual • 2009 County's Low Impact Development (LID) Standards Manual • 2010 Green Building Standards Code (California Code of Regulations Title 24, Part 11) • 2012 Best Management Practices Handbook 	Prior to approval of final designs and contractor's specifications and During construction activities	Design-Builder	County of Los Angeles Department of Public Works

**TABLE 3-1
MITIGATION MONITORING AND REPORTING PROGRAM**

Mitigation Measures	Mitigation Timing	Responsible Agency/Party	Monitoring Agency/Party
PDF HYD-2 The Contractor's Specifications will require that the Project will be designed and constructed in accordance with the County's Stormwater and Runoff Pollution Control Ordinance (Chapter 12.80 of the Los Angeles County Code), which prohibits illicit discharges; manages runoff into and from its Municipal Separate Storm Sewer Systems (MS4s); and requires BMPs for new development and major redevelopment projects.	Prior to approval of final designs and contractor's specifications and During construction activities	Design-Builder	County of Los Angeles Department of Public Works
RR HYD-1 The Project will be constructed in accordance with the National Pollutant Discharge Elimination System (NPDES) General Permit for Storm Water Discharges Associated with the Construction and Land Disturbance Activities, Order No 2009-0009-DWQ, NPDES No. CAS000002 (or the latest approved Construction General Permit). Compliance requires filing a Notice of Intent (NOI); a Risk Assessment; a Site Map; a Storm Water Pollution Prevention Plan (SWPPP) and associated Best Management Practices (BMPs); an annual fee; and a signed certification statement.	Prior to approval of final designs and contractor's specifications and During construction activities	Design-Builder	County of Los Angeles Department of Public Works
RR HYD-2 The Project will be constructed and operated in accordance with the National Pollutant Discharge Elimination System (NPDES) General Permit for Storm Water Discharges from Small Municipal Separate Storm Sewer Systems (MS4), Order No 2013-0001-DWQ, NPDES No. CAS000004 (or the latest approved MS4 General Permit). Compliance requires controls to reduce pollutants from the MS4 to the maximum extent practicable (MEP). The MEP standard requires Permittees to apply Best Management Practices (BMPs) that are effective in reducing or eliminating the discharge of pollutants to the waters of the U.S., and emphasizes pollutant reduction and source control BMPs to prevent pollutants from entering storm water runoff.	Prior to approval of final designs and contractor's specifications and During construction activities	Design-Builder	County of Los Angeles Department of Public Works
Land Use and Planning (Section 4.9 of the EIR)			
No PDF, RR or MM required.			
Noise (Section 4.10 of the EIR)			
PDF NOI-1 The Contractor's Specifications will require that the Project will use construction vehicles and equipment, either fixed or mobile, that will be equipped with properly operating and maintained mufflers (equivalent or better than original factory equipment), which will be	Prior to approval of contractor's specifications and	Design-Builder	County of Los Angeles Department of Public Works

**TABLE 3-1
MITIGATION MONITORING AND REPORTING PROGRAM**

Mitigation Measures	Mitigation Timing	Responsible Agency/Party	Monitoring Agency/Party
periodically inspected to ensure compliance. Equipment maintenance and staging areas will be located at least 450 feet from residences on 60th Street West.	During construction activities		
RR NOI-1 The Project will be constructed in accordance with Section 12.08.440 of the County Code, which prohibits construction activities that generate noise that could create a disturbance across a residential or commercial property line from occurring between 7:00 PM and 7:00 AM on weekdays, or at any time on Sunday or a federal holiday.	Prior to approval of contractor's specifications and During construction activities	Design-Builder	County of Los Angeles Department of Public Works
MM NOI-1 The County of Los Angeles Department of Public Works shall include the following requirement in the Contractor's Specifications: Stationary equipment, such as generators and air compressors, shall be located at least 450 feet from the residences on 60th Street West opposite the Project site. If stationary equipment use is required to be closer than 450 feet, the equipment shall include an enclosure or similar noise attenuation if needed to limit the average hourly daytime noise level at the nearest residential property line to 60 A-weighted decibels (dBA) or less. Proof of compliance, such as noise measurements during construction activities, shall be provided to the County of Los Angeles Department of Public Works within one week of the start of use of stationary equipment within 450 feet of a residence.	Prior to approval of contractor's specifications and During construction activities	Design-Builder	County of Los Angeles Department of Public Works
Population and Housing (Section 4.11 of the EIR)			
No PDF, RR or MM mitigation required.			
Public Services (Section 4.12 of the EIR)			
PDF PS-1 The Contractor's Specifications will require that the Project will include space to accommodate both indoor and outdoor recreational facilities for inmate use only, including a recreational building for indoor recreation (e.g., game tables and a craft room); a full sized sports court for volleyball and basketball; a soccer field; a running track; and gardening areas, for both vegetable and flower cultivation.	Prior to approval of final designs and contractor's specifications and During construction activities	Design-Builder	County of Los Angeles Department of Public Works

**TABLE 3-1
MITIGATION MONITORING AND REPORTING PROGRAM**

Mitigation Measures	Mitigation Timing	Responsible Agency/Party	Monitoring Agency/Party
<p>PDF PS-2 The Contractor's Specifications will require that the Project will include space to accommodate general education classes, computer training, general and vocational career technical education, career counseling, a learning resource center, a library and computer labs, and culinary classes that will be made available to the female inmate population and provided through on-site classrooms, library facilities, and computer labs.</p>	<p>Prior to approval of final designs and contractor's specifications and During construction activities</p>	<p>Design-Builder</p>	<p>County of Los Angeles Department of Public Works</p>
<p>PDF PS-3 The Contractor's Specifications will require that the Project will include space to accommodate a Medical Building and Inmate Processing Area that will provide medical screening; mental health screening; a pharmacy; dental care services; radiology; laboratory services; obstetrics and gynecological services; orthopedic and dermatology services; wellness, hygiene, and diseases prevention training; preventative medical care; sick call services; emergent care; annual medical and dental exams; and tele-medicine/tele-psychiatry services.</p>	<p>Prior to approval of final designs and contractor's specifications and During construction activities</p>	<p>Design-Builder</p>	<p>County of Los Angeles Department of Public Works</p>
<p>RR PS-1 The Project will be designed and constructed in accordance with the County of Los Angeles Fire Code (Los Angeles County Code, Title 32) and the regulations of the Los Angeles County Fire Department, which include standards for building construction that would reduce the creation of fire hazards and facilitate emergency response.</p>	<p>Prior to approval of final designs and contractor's specifications and During construction activities</p>	<p>Design-Builder</p>	<p>County of Los Angeles Department of Public Works</p>
<p>RR PS-2 The Project will be designed, constructed and operated in accordance with pertinent provisions of Title 15 of the California Code of Regulations (Crime Prevention and Corrections) and other applicable State and federal requirements. Title 15 (specifically Division 1, Chapter 1, Subchapter 4) outlines the minimum standards for local detention facilities, court holding facilities, temporary holding facilities, and law enforcement facilities, including lockups (a locked room or secure enclosure under the control of a peace officer or custodial officer and primarily used for the temporary confinement).</p>	<p>Prior to approval of final designs and contractor's specifications and During construction activities</p>	<p>Design-Builder</p>	<p>County of Los Angeles Department of Public Works</p>

**TABLE 3-1
MITIGATION MONITORING AND REPORTING PROGRAM**

Mitigation Measures	Mitigation Timing	Responsible Agency/Party	Monitoring Agency/Party
Transportation (Section 4.13 of the EIR)			
<p>PDF TRA-1 The Contractor's Specifications will require that the Vehicular access to the Project will be via two existing driveways: one at 60th Street West south of West Avenue I and one at West Avenue I. The site access driveways will be stop-sign controlled with a stop-sign facing the minor street approach (i.e., at the Project driveway). The Project driveways will have one inbound travel lane and one outbound travel lane. As determined by the County of Los Angeles Department of Public Works improvements to driveways to accommodate ingress/egress, including new curb and gutter improvements, may be required.</p>	<p>Prior to approval of final designs and contractor's specifications and During construction activities</p>	<p>Design-BUILDER</p>	<p>County of Los Angeles Department of Public Works</p>
<p>RR TRA-1 The Project's construction activities will be conducted in accordance with the provision of traffic-control devices in compliance with the Manual for Uniform Traffic Control Devices (MUTCD) to ensure traffic safety on public streets, highways, pedestrian walkways, and bikeways.</p>	<p>During construction activities</p>	<p>Design-BUILDER</p>	<p>County of Los Angeles Department of Public Works</p>
<p>RR TRA-2 The Project's construction activities on public rights-of-way will be conducted in accordance with the current Standard Specifications for Public Works Construction (Greenbook) and Additions and Amendments to the Standard Specifications for Public Works Construction (Graybook), including Traffic Control Provisions.</p>	<p>During construction activities</p>	<p>Design-BUILDER</p>	<p>County of Los Angeles Department of Public Works</p>
<p>RR TRA-3 For any off-site traffic or parking-related activities within the City of Lancaster, the Project's construction activities will be conducted in accordance with the City of Lancaster's Traffic Code (Title 10 of the Lancaster Municipal Code), related to vehicle parking on public roads; construction traffic signs and traffic control; and other related regulations.</p>	<p>During construction activities</p>	<p>Design-BUILDER</p>	<p>County of Los Angeles Department of Public Works</p>
Utilities and Service Systems (Section 4.14 of the EIR)			
<p>PDF UTL-1 The Contractor's Specifications will require that the Project will include the following on-site utility infrastructure improvements:</p> <ul style="list-style-type: none"> New on-site fire and domestic/potable water pipelines that connect to all existing and new buildings, and includes new fire hydrants, as required by the County of Los Angeles Fire Department and/or Department of Public Works. 	<p>Prior to approval of final designs and contractor's specifications and During construction activities</p>	<p>Design-BUILDER</p>	<p>County of Los Angeles Department of Public Works</p>

**TABLE 3-1
MITIGATION MONITORING AND REPORTING PROGRAM**

Mitigation Measures	Mitigation Timing	Responsible Agency/Party	Monitoring Agency/Party
<ul style="list-style-type: none"> New connections of the existing on-site sewage pipelines to ensure connection to new on-site buildings. New on-site storm drainage pipelines and facilities that connect with existing storm drain infrastructure that complies with storm water quality and quality control requirements under the County's SUSMP, LID standards, and Green Building Standards Code. 			
<p>PDF UTL-2 The Contractor's Specifications will require that the Project will include a new off-site 12-inch water pipeline extension from the on-site water lines to the existing water main within West Avenue I. The extension will connect from either 60th Avenue West or from the northern boundary of the site near the helipad, to the existing 12-inch LACWWD 40-owned distribution pipeline in West Avenue I. Existing connections to existing groundwater wells and reservoirs located adjacent to 60th Street West will be severed. The Project's disconnection from the existing water distribution system will be conducted in such a manner as to ensure the integrity of the existing wells, pumps, reservoirs, and water lines for continued use by other County-owned facilities currently being served by this water system.</p>	<p>Prior to approval of final designs and contractor's specifications and During construction activities</p>	<p>Design-Builder</p>	<p>County of Los Angeles Department of Public Works</p>
<p>RR UTL-1 The Project will be designed, constructed and operated in accordance with the County of Los Angeles Sanitation District's (LACSD's) Wastewater Ordinance, all wastewater discharges into LACSD facilities shall be required to comply with the discharge standards set forth to protect the public sewage system.</p>	<p>Prior to approval of final designs and contractor's specifications and During construction activities</p>	<p>Design-Builder</p>	<p>County of Los Angeles Department of Public Works</p>
<p>RR UTL-2 The Project's water, sewer, storm drain, and other utility infrastructure improvements will be designed, constructed and operated in accordance with the applicable regulations set forth in the Los Angeles County Code, which incorporates by reference the California Building Code, the California Electrical Code, the California Mechanical Code, the California Plumbing Code, the California Fire Code, and the Green Building Standards Code.</p>	<p>Prior to approval of final designs and contractor's specifications and During construction activities</p>	<p>Design-Builder</p>	<p>County of Los Angeles Department of Public Works</p>

**TABLE 3-1
MITIGATION MONITORING AND REPORTING PROGRAM**

Mitigation Measures	Mitigation Timing	Responsible Agency/Party	Monitoring Agency/Party
RR UTL-3 The Project will be constructed in accordance with the County's Green Building Standards Code and Construction and Demolition Debris Recycling and Reuse Ordinance, which requires a minimum of 65 percent of the "non hazardous construction and demolition debris" (by weight or volume) to be recycled or reused unless a lower percentage is approved by the Director of Public Works.	Prior to approval of final designs and contractor's specifications and During construction activities	Design-Builder	County of Los Angeles Department of Public Works
RR UTL-4 The Project will be designed, constructed and operated in accordance with the County's Departmental Recycling Program Directives to implement waste reduction and recycling measures.	Prior to approval of final designs and contractor's specifications and During construction activities and Ongoing, throughout operations	Design-Builder and County of Los Angeles Sheriff's Department	County of Los Angeles Department of Public Works and County of Los Angeles Sheriff's Department
MM UTL-1 The County shall enter the New Water Supply Entitlement Acquisition program established by the County Waterworks District No. 40 (LACWWD No. 40) and pay a one-time deposit of \$10,000 per acre-foot of annual water demand from the Project for the acquisition of additional water supplies from Antelope Valley-East Kern Water Agency (AVEK) to serve the Project, pursuant to the August 13, 2013 Memorandum of Understanding between LACWWD No. 40 and AVEK.	Prior to issuance of occupancy permit	County of Los Angeles Department of Public Works	County of Los Angeles Department of Public Works and Los Angeles County Waterworks District No. 40
Energy (Section 4.15 of the EIR)			
No PDF, RR or MM required.			

SECTION 4.0 REVISIONS, CLARIFICATIONS, AND CORRECTIONS ON THE DRAFT EIR

The number of changes to the Draft EIR have been made based on the comments and the responses to the comments. These are listed below, with inserted text shown as **bold** and deleted text shown as ~~strikeout~~.

Page ES-9, Table ES-2 and Page 4.2-13 and Page 4.6-12

PDF AIR-3 is revised to read:

PDF AIR-3 The Contractor's Specifications will require that on-site gardening **features be constructed within** ~~activities will be conducted in contained~~ raised beds only and will be filled with imported soils derived from outside the Antelope and Kern Valleys so that inmates would not be interacting directly with local soils.

PDF GHG-3 is revised to read:

PDF GHG-3 The Project **site will have the** ~~post~~ Antelope Valley Transit Authority (AVTA) bus and Metrolink schedules **posted**, as well as the locations of the nearest Park-and-Ride lots, in areas visible to visitors and in the Staff Services building to encourage the use of public transportation by staff and visitors. AVTA bus and Metrolink schedule information will be updated ~~not less than every six months to ensure that they are accurate~~ **to ensure accuracy**.

RR GHG-5 is revised to read:

RR GHG-5 The Project will be subject **to any project direction adopted by the Board of Supervisors based upon** the findings of the Advisory Board's evaluation of strategies to reduce negative impacts of operating the MLWDC away from the downtown Los Angeles area, including contract transportation for visitors, videoconferencing for attorney consultation, and reviewing national best practices for visiting and family reunification.

Pages 1-2 and 1-3, Section 1.1.4

To replace the discussion and dates of documents that provided context and background for the actions taken by the Board of Supervisors related to County jails in general, and the Project in particular, the text is revised to read:

This EIR references several technical studies, analyses, and reports that have been used in the preparation of this EIR, which are identified at the end of each section under the heading "References". The preparation of this EIR also relied upon information provided in various County of Los Angeles Board of Supervisors Agenda Reports, Summary of Proceedings, and Final Meeting Minutes. These documents provided context and background for the actions taken by the Board of Supervisors related to County jails in general, and the Project in particular. In accordance with Section 15150(b) of the State CEQA Guidelines, the locations where the public may obtain and review these referenced documents by appointment during normal business hours used in the preparation of the EIR include the County of Los Angeles, Public Information Office at 358 Kenneth Hahn Hall of Administration, 500 W. Temple Street, Los Angeles, California 90012. As stated in Section 15150(f) of the State CEQA Guidelines, incorporation by reference is most appropriate for including long, descriptive, or technical materials that provide general background but do not contribute directly to the analysis of the

problem at hand. ~~The summary listing of Board Agenda Reports, Summary Proceedings, and Final Meeting Minutes referenced below provide an overview of the Board of Supervisor's deliberations and actions taken on the following dates:~~

~~2006: March 6, March 21, June 20, July 11, August 1
2007: January 9, June 18, September 11, October 16, November 6, November 27
2008: January 29, February 19, March 4, March 18, April 8
2011: October 11, October 18, October 25, November 1, November 29
2012: January 24, May 6
2013: May 21, July 12, July 16, August 20, October 18, October 22
2014: May 6
2015: January 26, September 4~~

The County of Los Angeles Board of Supervisors' official meeting minutes, called Statements of Proceedings, along with related documents including Board Agenda Reports, individual motions, filed reports and meeting transcripts concerning the proposed Project, are also incorporated by reference. These documents can be accessed on the County's website by meeting date or the searchable links, including "Statement of Proceedings/Minutes" or "Transcripts", available on line at:

<http://bos.lacounty.gov/Board-Meeting/Board-Agendas>

The summary listing below of these contextual documents incorporated by reference provides a non-exclusive selection of dates of the Board of Supervisors' deliberations and actions taken related to topics including County jail system capacity, diversion from incarceration in general, and the proposed Project:

2006 - February 14, March 14, March 21, June 20, July 21, August 1

2007 - June 18, September 11, October 9, October 16, November 6, November 27

2008 - January 29, February 19, March 4, March 18, April 8

2011 - October 11, October 18, October 25, November 1, November 29

2012 - January 24, June 6

2013 - May 21, July 16, August 20, September 3, September 17, October 22

2014 - May 6, June 23, July 29, August 5

2015 - May 5, May 19, May 26, June 9, August 4, August 11, August 18, September 1

Page 4.2-9

4th paragraph, 3rd sentence is revised to read:

The majority of people (approximately 60 percent) ~~exposed to~~ **infected with** Valley Fever spores develop no symptoms (CDPH ~~2012~~**2016**).

Page 4.2-21

The California Department of Corrections and Rehabilitation (CDCR) determined the State prison facilities that are located in the geographic area where Valley Fever has been reported to be most common are: Avenal State Prison (ASP) in Kings County; Substance Abuse Treatment Facility (SATF) in Kings County; California State Prison-Corcoran in Kings County; ~~California Men's Colony (CMC) in San Luis Obispo County~~; Pleasant Valley State Prison (PVSP) in Fresno County; California Correctional Institution (CCI) in Kern County; Kern Valley State Prison (KVSP) in Kern County; North Kern State Prison (NKSP) in Kern County; and Wasco State Prison in Kern County (WSP) (U.S. District Court 2013). In 2011, 535 of the 640 reported Valley Fever cases within the CDCR (approximately 85 percent) occurred at ASP and PVSP.

The ~~nine~~ prisons and facilities identified by the CDCR as having a higher risk of exposure to Valley Fever do not include the California State Prison- Los Angeles County, located in the City of Lancaster, which is adjacent to the MLWDC Project site. As such, the CDCR has not identified the Lancaster area as being a geographic location that requires screening or interventions for the State prison population with regard to exposure to Valley Fever.

Page 4.2-24

A new reference is added:

California Department of Public Health (CDPH). 2016 (January). Valley Fever Fact Sheet. Sacramento, CA: CDPH.
<https://www.cdph.ca.gov/HealthInfo/discond/Documents/VFGeneral.pdf>

Page 4.3-13

MM BIO-3, 2nd paragraph, 4th sentence is revised to read:

If in-lieu mitigation fees are required, prior to the initiation of any construction-related activities, the ~~LACFCDC~~**County** shall pay the in-lieu mitigation fee to a mitigation bank/enhancement program for the in-kind (equivalent vegetation type and acreage) replacement of impacted jurisdictional resources.

Page 4.3-13

MM BIO-3, 2nd paragraph, 5th sentence is revised to read:

If a Restoration Program is required, prior to the initiation of any construction-related activities, ~~LACFCDC~~**County** shall prepare and submit a Riparian Habitat Mitigation and Monitoring Program (HMMP) for USACE and CDFW approval.

Page 4.6-14

3rd paragraph, 2nd sentence is revised to read:

The Project is proposed for construction beginning in ~~November~~**December** 2016, with the facility in operation by the last quarter of 2019.

Page 4.12-3

Table 4.12-1, last column is revised to read:

**TABLE 4.12-1
FIRE STATIONS IN THE PROJECT AREA**

Fire Station Number	Address	Distance from Project Site
84	5030 West Avenue L-14 Quartz Hill, CA 93536	3.75 4.7 miles south
112	8812 West Avenue E-8 Lancaster, CA 93536	4.37 6.9 miles northwest
130	44558 40 th Street West Lancaster, CA 93536	4.7 1.8 miles east
134	43225 25 th Street West Lancaster, CA 93534	3.87 5.7 miles southeast

* Source: Lancaster 2009b, LACFD 2015.

Page 4.12-3

1st paragraph after Table 4.12-1, 1st sentence is revised to read:

Fire Station 130 is located closest (**1.78** miles) to the site and is the jurisdictional station (i.e., first due) for the Project site.

Page 4.12-3

1st paragraph after Table 4.12-1, last sentence is revised to read:

Effective January 1, 2015, **this station is staffed with a four-person assessment engine, which is an engine company with some limited paramedic capabilities, and a two-person paramedic squad.** ~~the three-person engine company was converted to a four-person assessment engine, which is an engine company with some limited paramedic capabilities (LACFD 2014.)~~

Page 4.14-13

1st paragraph after Table 4.14-3, last sentence is revised to read:

This trunk sewer eventually connects to the Lancaster Water Reclamation Plant at ~~18~~**18965** West Avenue D in Lancaster, which has a design capacity of 18 mgd and currently processes an average of ~~13.415~~ **175** mgd (LACSD 2014a, **2016**).

Page 4.14-30

2nd paragraph under Long-Term Operational Impacts, 1st sentence is revised to read:

The LACSD estimated the average wastewater flow increase from the Project ~~at 100,800 to be 98,700 gpd (which assumes 175 gpd per additional bed)~~ **at 100,800 to be 98,700 gpd** (LACSD 2014a, **2016**).

Page 4.14-25 - Table 4.14-6; Page 4.14-26 - Table 4.14-7; Page 4.14-27 - Table 4.14-8 and Table 4.14-9; and Page 4.14-28 - Table 4.14-10 and Table 4.14-11:

A star is added at the row for Imported Water: Imported Water*

A note is added at the bottom of each table to read:

***Imported Water Values vary from the District 40 2010 IRUWMP as this WSA uses the 2013 SWP Reliability percentages (see Table 5.1).**

Page 5-2 – Text and Table 5-1

The Jail Plan Report was issued on July 5, 2013 and it identified several critical needs for the County-wide jail system, including the need to: (1) close and demolish Men's Central Jail; (2) provide appropriate mental health treatment facilities; (3) restore Twin Towers Correctional Facility 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 **described in the 2014 version of the report** are summarized in Table 5-1, **including estimated operating and construction costs for each option:**

TABLE 4-1
JAIL PLAN REPORT SUMMARY OF OPTIONS

Option	Description	New Beds	Total Operating Capacity (Beds)	Total Estimated Project Annual Operational Cost	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	\$456 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
Facility Names CCTF: Consolidated Correctional Treatment Facility PDC: Pitchess Detention Center, Santa Clarita, CA. MLDC: Mira Loma Detention Center, Lancaster, CA Source: Vanir 2014 (Appendix A-4)					

Appendix G-2 - Water Supply Assessment

Tables 5.4, 5.5, 5.6, 5.7, 5.8, and 5.9 are revised as follows:

A star is added at the row for Imported Water: Imported Water*

A note is added at the bottom of each table to read:

***Imported Water Values vary from the District 40 2010 IRUWMP as this WSA uses the 2013 SWP Reliability percentages (see Table 5.1).**

These changes merely clarify or update the discussion but do not change the analysis or conclusions of the Draft EIR. Based on the analysis in the Draft EIR, the comments received, and the responses to these comments, no substantial new environmental issues have been raised that have not been adequately addressed in the Draft EIR. Also, no changes to the analysis or conclusions of the Draft EIR are necessary based on the comments, the responses to the comments, and the revisions to the Draft EIR that are listed above.

SECTION 5.0 REFERENCES

- Antelope Valley Air Quality Management District (AVAQMD). 2008. (May 20, adopted). *AVAQMD Federal 8-Hour Ozone Attainment Plan (Western Mojave Desert Non-attainment Area)*. Lancaster, CA: AVAQMD. <http://www.avaqmd.ca.gov/Modules/ShowDocument.aspx?documentid=923>
- . 2004 (April 20). *AVAQMD 2004 Ozone Attainment Plan (State and Federal)*. Lancaster, CA: AVAQMD. <http://www.avaqmd.ca.gov/Modules/ShowDocument.aspx?documentid=922>.
- . 1989 (October, as amended through 1994). Rule 1403: Asbestos Emissions from Demolition/Renovation Activities. Lancaster, CA: AVAQMD. <http://www.avaqmd.ca.gov/Modules/ShowDocument.aspx?documentid=747>.
- . 1976a (April, adopted). Rule 402: Nuisance. Lancaster, CA: AVAQMD. <http://www.avaqmd.ca.gov/Modules/ShowDocument.aspx?documentid=866>.
- . 1976b (as amended through 2010). Rule 403: Fugitive Dust. Lancaster, CA: AVAQMD. <http://www.avaqmd.ca.gov/Modules/ShowDocument.aspx?documentid=867>.
- AW Associates, Inc. (2015 (July 22). Monitoring System Certification – LA Cnty Sheriff - Mira Loma Det. Center. Corona, CA: AW Associates, Inc.
- BonTerra. 2014 (January 30). Transmittal: Sacred Lands File Search and Contact List Request: Mira Loma Detention Facility Project. Irvine, CA: BonTerra.
- Bornman, M. 2014 (February). *Mira Loma Center for Women Program Model, Education Based Incarceration*. Los Angeles, CA: Education Based Incarceration Bureau.
- California Department of Corrections and Rehabilitation (CDCR). 2013 (September 5). California Correctional Health Care Services Memorandum- Available Now – Cocci Risk Registry. Sacramento, CA: CDCR.
- California Department of Public Health (CDPH). 2016 (January). Valley Fever Fact Sheet. Sacramento, CA: CDPH. <https://www.cdph.ca.gov/HealthInfo/discond/Documents/VFGeneral.pdf>.
- California Environmental Reporting System (CERS). 2016. CERS Business, Compliance: Mira Loma Detention Facility. Sacramento, CA: CERS.
- Centers for Disease Control (CDC). 2016 (January 5, last updated). Fungal Diseases: Sources of Valley Fevers (Coccidioidomycosis). Atlanta, GA: CDC. <http://www.cdc.gov/fungal/diseases/coccidioidomycosis/causes.html>.
- Converse Consultants (Converse). 2016a (March 21). *Limited Asbestos and Lead-based Paint Sampling Report – Buildings 27, 27, 29, 32 and 40, Mira Loma Detention Facility*. Monrovia, CA: Converse.
- . 2016b (January 7). Supplemental Phase II ESA Soil Sampling Report, *Mira Loma Women's Village, 45100 60th Street West, Lancaster, California*. Monrovia, CA: Converse.

- . 2015 (March). *Phase II Environmental Site Assessment Report, Mira Loma Women's Village, 45100 60th Street West, Lancaster, California*. Monrovia, CA: Converse.
- . 2014a (September). *Asbestos & Lead-based Paint Survey Report, Mira Loma Detention Facility, 45100 60th Street West, Lancaster, California*. Monrovia, CA: Converse.
- . 2014b (June). *Geohazard Study Report Mira Loma Detention Center, 45100 North 60th Street West, Lancaster, California*. Monrovia, CA: Converse.
- . 2014c (May). *Phase I Environmental Site Assessment Report, Mira Loma Detention Facility and Transitional Facility (AB900), 45100 60th Street West, Lancaster, California*. Monrovia, CA: Converse.
- DLR Group. 2015. *Mira Loma Detention Center Women's Facility Project – Operations and Maintenance Data*. Santa Monica, CA: DLR Group.
- GPA Consulting (GPA). 2015 (April). *Mira Loma Women's Detention Center Historical Resource Report*. El Segundo, CA: GPA.
- Guevara, R.E., T. Motala, D. Terashita. 2015. The Changing Epidemiology of Coccidioidomycosis in Los Angeles (LA) County, California, 1973–2011. *PLoS ONE* 10(8).
- Kern County Public Health Services Department (KCPHSD). 2016 (March, access date). Kern County Valley Fever Cases by Selected Measure. Bakersfield, CA: KCPHSD. <http://kerncountyvalleyfever.com/cases-in-kern-county-2/>.
- Lacey, J. 2015 (August 4). 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 (a letter from J. Lacey, District Attorney to M.D. Antonovich, Mayor; H.L. Solis, Supervisor; M. Ridley-Thomas, Supervisor; S. Kuehl, Supervisor; and D. Knabe, Supervisor).
- Linscott, Law and Greenspan (LLG). 2015 (April). Traffic Impact Study, Mira Loma Women's Detention Center, City of Lancaster, California. Pasadena, CA: LLG.
- Los Angeles, County of. 2015a (current through). *Los Angeles County, California – Code of Ordinances*. Tallahassee, FL: Municipal Code Corporation for the County. https://www.municode.com/library/ca/los_angeles_county.
- . 2015b (June 9). Statement of Proceedings for the Regular Meeting of the Board of Supervisors of the County of Los Angeles Held in Room 381B of the Kenneth Hahn Hall of Administration, 500 West Temple Street, Los Angeles, California 90012. Los Angeles, CA: the County. http://file.lacounty.gov/bos/sop/cms1_230083.pdf.
- . 2015c (June 9). Report for Item S-1 at the Regular Meeting of the Board of Supervisors of the County of Los Angeles - County of Los Angeles Consolidated Correctional Treatment Facilities. Los Angeles, CA: the County. <http://file.lacounty.gov/bos/supdocs/94070.pdf>.
- . 2014 (April). *Architectural Program for the Consolidated Correctional Treatment Facility and Mira Loma Detention Center, Los Angeles County Jail Plan Independent Review and*

Comprehensive Report. Los Angeles, CA: the County.
<http://bos.co.la.ca.us/LinkClick.aspx?fileticket=88pJb2FG0k4%3D&portalid=1>.

Los Angeles, County of, Department of Public Health (LACDPH). 2013. *Acute Communicable Disease Control- 2013 Annual Morbidity Report- Coccidioidomycosis*. Los Angeles, CA: LADPH. <http://publichealth.lacounty.gov/acd/diseases/Cocci.pdf>.

Los Angeles, County of, Department of Health Services (LACDHS). 2004 (February 16). *Design/Construction and Maintenance Risk Assessment: Policies and Procedures - Infection Control Policy No. 918*. Los Angeles, CA: LACDHS.

Los Angeles, County of, Department of Public Works (LACDPW). 2015 (February 12, access date). *County of Los Angeles Departmental Recycling Program – County Policy*. Los Angeles, CA: County of. <https://dpw.lacounty.gov/epd/drp/CountyPolicy.cfm>.

Los Angeles County Department of Public Works, Waterworks District 40 (LACWWD 40) and Quartz Hill Water District (QHWD). 2011 (June). *2010 Integrated Regional Urban Water Management Plan for the Antelope Valley*. Alhambra, CA: LACWWD. <http://dpw.lacounty.gov/wwd/web/Documents/2010%20Integrated%20Urban%20Water%20Management%20Plan%20for%20the%20Antelope%20Valley.pdf>.

Los Angeles, County of, District Attorney (LACDA). 2015 (August). *Mental Health Advisory Report: A Blueprint for Change*. Los Angeles, CA: LACDA. <http://da.lacounty.gov/sites/default/files/policies/Mental-Health-Report-072915.pdf>.

Los Angeles, County of, Fire Department (LACFD). 2015 (November 23). *Notice of Availability of the Draft Environmental Impact Report and Notice of Public Meeting, "Mira Loma Women's Detention Center Project", Proposes Reuse, Renovation, and Expansion of the Majority of the Currently Unoccupied MLDC Property to Provide a Total of 1,604 Beds for Low- to Medium-Security Female Inmates, 45100 60th Street West, Lancaster (FFER 201500196)*. Los Angeles, CA: LACFD.

Maricopa County Air Quality Department (MCAQD). 2005 (June). *Guidance for Application for Dust Control Permit*. Phoenix, AZ: MCAQD. [https://yosemite.epa.gov/r9/r9sips.nsf/0/5AA10C40762418DB8825735B00605302/\\$file/GuidanceForApplicationForDustControlPermit.pdf?OpenElement](https://yosemite.epa.gov/r9/r9sips.nsf/0/5AA10C40762418DB8825735B00605302/$file/GuidanceForApplicationForDustControlPermit.pdf?OpenElement).

Masis, E. (2015). October 28. Personal communication between A. Ramos, Sr. Capital Projects Manager County of Los Angeles Department of Public Works and E. Masis, Industrial Hygienist at County of Los Angeles Department of Public Health. Los Angeles, CA.

McCarthy, D. 2014 (February 6). Personal communication. Email from D. McCarthy, Director, Cultural Resources Management Department (San Manuel Band of Mission Indians) to P. Maxon, Director, Cultural Resources (BonTerra).

McLeod, S. 2016 (February). *Paleontological Resources for the Proposed Mira Loma Detention Facility Project, near Lancaster, Los Angeles County, project area*. Los Angeles, CA: Natural History Museum of Los Angeles County.

———. 2010. *Paleontological Resources for the proposed Lancaster Solar Farm Project, in the City of Lancaster, Los Angeles County, project area*. Los Angeles, CA: Natural History Museum of Los Angeles County.

- Native American Heritage Commission (NAHC). 2014 (January 31). Sacred Lands File Search and Native American Contacts List for the "Mira Loma Detention Facility Project" located in the City of Lancaster, Los Angeles County, California. Sacramento, CA: NAHC.
- Psomas. 2015 (May). *Mira Loma Detention Center Women's Facility Water Supply Assessment*. Santa Ana, CA: Psomas.
- Regional Water Management Group (RWMG). 2013. *Antelope Valley Integrated Regional Water Management Plan – Final, 2013 Update*. <http://www.avwaterplan.org/>.
- Rosenstein, T. 2016 (March 11). Personal communication. Phone call between T. Rosenstein (Lancaster Planning Department) and J. Alido (BonTerra Psomas).
- Sacramento Metropolitan Air Quality Management District (SMAQMD). 2009 (as revised through November 2014). *Guide to Air Quality Assessment in Sacramento County*. Sacramento, CA: SMAQMD. <http://www.airquality.org/ceqa/ceqaupdate.shtml>.
- San Luis Obispo County Public Health Department (SLOCPHD). 2014 (May). *Epidemiologic Profile of Coccidioidomycosis in San Luis Obispo County, CA 1996–2012*. San Luis Obispo, CA: SLOCPHD. <http://www.slocounty.ca.gov/Assets/PH/Epidemiology/Epi+Profile+of+Cocci.pdf>.
- Sanitation Districts of Los Angeles County (LACSD). 2016 (February). Comment Letter for the Mira Loma Women's Detention Center Project. Whittier, CA: LACSD.
- . 2014 (October 6). Personal communication. Letter from A. Raza, Customer Service Specialist (LACSD) to M. Diaz (County of Los Angeles Chief Executive Office) regarding the Mira Loma Detention Center Women's Facility Project.
- South Coast Air Quality Management District (SCAQMD). 2008 (October). *Draft Guidance Document – Interim CEQA Greenhouse Gas (GHG) Significance Thresholds*. Diamond Bar, CA: SCAQMD.
- Southern California Gas Company (SCG). 2015 (January 21, date accessed). California Energy Hub. Chatsworth, CA: SCG. <http://www.socalgas.com/for-your-business/ceh.shtml>.
- U.S. Census Bureau. 2016 (February, access date). ACS Demographic and Housing Estimates: 2010-2014 American Community Survey 5-Year Estimates. Washington, D.C.: U.S. Census Bureau.

Final Environmental Impact Report

Response to Comments, Mitigation Monitoring and Reporting Program, and Revisions, Clarifications, and Corrections to the Draft EIR

**County of Los Angeles
Mira Loma Women's Detention Center Project
City of Lancaster, California**

SCH No. 2014091012

Appendices

Prepared for | County of Los Angeles Chief Executive Office
Capital Projects/Debt Management Division
754 Kenneth Hahn Hall of Administration
500 West Temple Street
Los Angeles, California 90012

Prepared by | BonTerra Psomas
225 South Lake Avenue, Suite 1000
Pasadena, California 91101
T: (626) 351-2000 F: (626) 351-2030

September 2016



TABLE OF CONTENTS

<u>Section</u>	<u>Page</u>
<u>Volume 1</u>	
Section 1.0 Introduction	1
1.1 The California Environmental Quality Act and Public Review of the Draft Environmental Impact Report	1
1.2 Project Description.....	4
1.2.1 <i>Project Location and Setting</i>	4
1.2.2 <i>Project Description</i>	5
1.3 Summary of Environmental Impacts.....	6
Section 2.0 Responses to Comments	7
2.1 State, Regional, and Local Agencies.....	8
2.1.1 <i>Antelope Valley Air Quality Management District (AVAQMD)</i>	9
2.1.2 <i>Los Angeles County Fire Department (LACFD)</i>	10
2.1.3 <i>Los Angeles County Sanitation Districts (Districts)</i>	11
2.1.4 <i>State of California Clearinghouse and Planning Unit (SCH)</i>	13
2.1.5 <i>State of California Clearinghouse and Planning Unit (SCH)</i>	14
2.2 Organizations.....	15
2.2.1 <i>Antelope Valley Rural Museum (AVRM)</i>	16
2.2.2 <i>Californians United for a Responsible Budget (CURB)</i>	17
2.2.3 <i>Critical Resistance Los Angeles et al. (CRLA)</i>	20
2.2.4 <i>National Day Laborer Organizing Network (NDLON)</i>	64
2.2.5 <i>National Immigration Law Center (NILC)</i>	67
2.2.6 <i>Weingart</i>	70
2.2.7 <i>Women of Color in the Global Women's Strike (WOC)</i>	102
<u>Volume 2</u>	
2.3 Individuals.....	110
2.3.1 <i>Form Letter</i>	113
2.3.2 <i>Individualized Introductions to Form Letters</i>	122
<u>Volume 3</u>	
2.3.3 <i>Individual Comment Letters</i>	215
Section 3.0 Mitigation Monitoring and Reporting Program.....	389
Section 4.0 Revisions, Clarifications, and Corrections on the Draft EIR.....	411
Section 5.0 References	417

TABLES

<u>Table</u>		<u>Page</u>
3-1	Mitigation Monitoring and Reporting Program.....	390
4-1	Jail Plan Report Summary of Options	415

APPENDICES

Appendices

- A Form Letters
- B Cultural Resources Records Search
- C San Manuel Band of Mission Indians Response to the Project
- D Limited Asbestos and Lead-Based Paint Sampling Report - Buildings 27, 28, 29, 32 and 40
- E California Environmental Reporting System (CERS) database and Monitoring System Certification
- F Supplemental Phase II ESA Soil Sampling Report



Appendix A
Form Letters

-----Original Message-----

From: Halimah Allah [mailto:allahasiatic@earthlink.net]

Sent: Wednesday, January 06, 2016 11:32 PM

To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental <environmental@ceo.lacounty.gov>; lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov; FifthDistrict@lacbos.org

Subject: Attn: Mira Loma Women's Jail Environmental Impact Report

Dear LA County Chief Exec Office and Board of Supervisors,

[Insert brief introductory message why you oppose jail]

Please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

A new jail in Lancaster County will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the County of Los Angeles, in extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

--

Halimah Allah
allahasiatic@earthlink.net
2271 N. Lake Ave. #6301
Altadena, CA 91001-2414

-----Original Message-----

From: Terrie Allen [mailto:only1scrappy@yahoo.com]

Sent: Monday, February 29, 2016 6:05 PM

To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental <environmental@ceo.lacounty.gov>; lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov; FifthDistrict@lacbos.org

Subject: Attn: Mira Loma Women's Jail Environmental Impact Report

Dear LA County Chief Exec Office and Board of Supervisors,

[Insert brief introductory message why you oppose jail]

Please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

A new LA county jail in Lancaster will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the County of Los Angeles, in extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

--

Terrie Allen

only1scrappy@yahoo.com

-----Original Message-----

From: Eve Allin [mailto:eveallin@hotmail.com]

Sent: Wednesday, March 02, 2016 3:38 PM

To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental <environmental@ceo.lacounty.gov>; lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov; FifthDistrict@lacbos.org

Subject: Attn: Mira Loma Women's Jail Environmental Impact Report

Dear LA County Chief Exec Office and Board of Supervisors,

[Insert brief introductory message why you oppose jail]

Please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

A new LA county jail in Lancaster will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the County of Los Angeles, in extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

--

Eve Allin
eveallin@hotmail.com

From: Giuliani Alvarenga <giuliani.alvarenga@gmail.com>
Sent: Monday, February 08, 2016 9:44 PM
To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental;
lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-
Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov;
FifthDistrict@lacbos.org
Subject: Attn: Mira Loma Women's Jail Environmental Impact Report

Dear LA County Chief Exec Office and Board of Supervisors,

[Insert brief introductory message why you oppose jail]

Please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

A new LA county jail in Lancaster will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the County of Los Angeles, in extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

--
Giuliani Alvarenga
giuliani.alvarenga@gmail.com
4411 Turquoise Street
Los Angeles, CA 90032

-----Original Message-----

From: Eyal Amiran [mailto:eyal.amiran@gmail.com]

Sent: Wednesday, January 06, 2016 3:38 PM

To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental <environmental@ceo.lacounty.gov>; lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov; FifthDistrict@lacbos.org

Subject: Attn: Mira Loma Women's Jail Environmental Impact Report

Dear LA County Chief Exec Office and Board of Supervisors,

[Insert brief introductory message why you oppose jail]

Please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

We need to reform sentencing guidelines and focus on rehabilitation. We have more people in jail than any other advanced country does. I do not support building new jails now. Let's invest the same money in rehab facilities, training, and community-based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

The proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

--

Eyal Amiran

eyal.amiran@gmail.com

2013 Micheltorena St.

Los Angeles, California 90039

-----Original Message-----

From: Marylucia Arace [mailto:maryarace@gmail.com]

Sent: Monday, February 29, 2016 1:15 PM

To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental <environmental@ceo.lacounty.gov>; lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov; FifthDistrict@lacbos.org

Subject: Attn: Mira Loma Women's Jail Environmental Impact Report

Dear LA County Chief Exec Office and Board of Supervisors,

[Insert brief introductory message why you oppose jail]

Please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

A new LA county jail in Lancaster will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the County of Los Angeles, in extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

--

Marylucia Arace
maryarace@gmail.com
1134 Cerritos Drive
Fullerton, California 92835

-----Original Message-----

From: Cleveland Baker [mailto:Peereducator.cb@gmail.com]

Sent: Monday, January 11, 2016 11:42 AM

To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental <environmental@ceo.lacounty.gov>; lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov; FifthDistrict@lacbos.org

Subject: Attn: Mira Loma Women's Jail Environmental Impact Report

Dear LA County Chief Exec Office and Board of Supervisors,

[Insert brief introductory message why you oppose jail]

Please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

A new LA county jail in Lancaster will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the County of Los Angeles, in extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

--

Cleveland Baker
Peereducator.cb@gmail.com
10500 E Tanque Verde Rd
Tucson, Arizona
Amity Foundation

-----Original Message-----

From: Rosalina Baldonado [mailto:29rbaldonado@gmail.com]

Sent: Monday, February 29, 2016 8:40 PM

To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental <environmental@ceo.lacounty.gov>; lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov; FifthDistrict@lacbos.org

Subject: Attn: Mira Loma Women's Jail Environmental Impact Report

Dear LA County Chief Exec Office and Board of Supervisors,

[Insert brief introductory message why you oppose jail]

Please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

A new LA county jail in Lancaster will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the County of Los Angeles, in extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

--

Rosalina Baldonado
29rbaldonado@gmail.com
969E Chilton
Tempe, Arizona 85283

From: Abigail Bates <abbiebates@hotmail.com>
Sent: Friday, February 05, 2016 1:32 PM
To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental;
lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-
Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov;
FifthDistrict@lacbos.org
Subject: Attn: Mira Loma Women's Jail Environmental Impact Report

Dear LA County Chief Exec Office and Board of Supervisors,

[Insert brief introductory message why you oppose jail]

Please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

A new LA county jail in Lancaster will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the County of Los Angeles, in extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

--
Abigail Bates
abbiebates@hotmail.com
3706 Motor Avenue #35
Los Angeles, CA 90034

Ms.

-----Original Message-----

From: Claudia Bautista [mailto:cbautista@ndlon.org]

Sent: Monday, January 11, 2016 3:10 PM

To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental <environmental@ceo.lacounty.gov>; lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov; FifthDistrict@lacbos.org

Subject: Attn: Mira Loma Women's Jail Environmental Impact Report

Dear LA County Chief Exec Office and Board of Supervisors,

[Insert brief introductory message why you oppose jail]

Please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

A new LA county jail in Lancaster will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the County of Los Angeles, in extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

--

Claudia Bautista
cbautista@ndlon.org
675 S. Park View St., Suite B
Los Angeles, California 90057
National Day Laborer Organizing Network

-----Original Message-----

From: Karen Berger [mailto:kareneliseberger@gmail.com]

Sent: Friday, January 08, 2016 2:09 PM

To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental <environmental@ceo.lacounty.gov>; lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov; FifthDistrict@lacbos.org

Subject: Attn: Mira Loma Women's Jail Environmental Impact Report

Dear LA County Chief Exec Office and Board of Supervisors,

[Insert brief introductory message why you oppose jail]

Please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

A new LA county jail in Lancaster will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the County of Los Angeles, in extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

--

Karen Berger
karenliseberger@gmail.com
4412 Ocean View Blvd Apt NUMBER
Montrose, CA 91020

From: Mary Beth Blakey <Mary.beth.blakey@gmail.com>
Sent: Monday, February 08, 2016 9:04 PM
To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental;
lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-
Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov;
FifthDistrict@lacbos.org
Subject: Attn: Mira Loma Women's Jail Environmental Impact Report

Dear LA County Chief Exec Office and Board of Supervisors,

please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

A new LA county jail in Lancaster will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the County of Los Angeles, in extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

--

Mary Beth Blakey
Mary.beth.blakey@gmail.com

-----Original Message-----

From: Jeffrey Bowen [mailto:Jeffreylynnbowen@gmail.com]

Sent: Thursday, January 07, 2016 1:06 AM

To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental <environmental@ceo.lacounty.gov>; lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov; FifthDistrict@lacbos.org

Subject: Attn: Mira Loma Women's Jail Environmental Impact Report

Dear LA County Chief Exec Office and Board of Supervisors,

[Insert brief introductory message why you oppose jail]

Please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

A new jail in Lancaster County will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the County of Los Angeles, in extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

--

Jeffrey Bowen
Jeffreylynnbowen@gmail.com
3745 S Grand Ave
Los Angeles, Ca 90007

-----Original Message-----

From: Lynda Brewer [mailto:Lynda.brewer073@gmail.com]

Sent: Friday, January 08, 2016 9:16 PM

To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental <environmental@ceo.lacounty.gov>; lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov; FifthDistrict@lacbos.org

Subject: Attn: Mira Loma Women's Jail Environmental Impact Report

Dear LA County Chief Exec Office and Board of Supervisors,

[Insert brief introductory message why you oppose jail]

Please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

A new LA county jail in Lancaster will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the County of Los Angeles, in extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

--

Lynda Brewer

Lynda.brewer073@gmail.com

Po box 18294

Los Angeles , California 90018

From: Shelley Brown <curiousr@me.com>
Sent: Friday, February 05, 2016 1:45 PM
To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental;
lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-
Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov;
FifthDistrict@lacbos.org
Subject: Attn: Mira Loma Women's Jail Environmental Impact Report

Dear LA County Chief Exec Office and Board of Supervisors,

[Insert brief introductory message why you oppose jail]

Please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

A new LA county jail in Lancaster will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the County of Los Angeles, in extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

--
Shelley Brown
curiousr@me.com
2115 S Victoria Ave
Los Angeles, CA 90016-1815

-----Original Message-----

From: Robert Burk [mailto:bobbajo@aol.com]

Sent: Wednesday, January 06, 2016 1:54 PM

To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental <environmental@ceo.lacounty.gov>; lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov; FifthDistrict@lacbos.org

Subject: Attn: Mira Loma Women's Jail Environmental Impact Report

Dear LA County Chief Exec Office and Board of Supervisors,

[Insert brief introductory message why you oppose jail]

Please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

A new jail in Lancaster County will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the County of Los Angeles, in extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

--

Robert Burk
bobbajo@aol.com
611 Woodruff Ave.
Los Angeles, CA 90024

-----Original Message-----

From: Kathryn Burns [mailto:burnszilla@sbcglobal.net]

Sent: Monday, February 29, 2016 5:57 PM

To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental <environmental@ceo.lacounty.gov>; lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov; FifthDistrict@lacbos.org

Subject: Attn: Mira Loma Women's Jail Environmental Impact Report

Dear LA County Chief Exec Office and Board of Supervisors,

[Insert brief introductory message why you oppose jail]

Please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

A new LA county jail in Lancaster will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the County of Los Angeles, in extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

--

Kathryn Burns
burnszilla@sbcglobal.net
5781 Los Pacos St.
Buena Park, CA 90620-3440
self

-----Original Message-----

From: Debra Burrough [mailto:debraburrough@verizon.net]

Sent: Monday, January 11, 2016 12:56 PM

To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental <environmental@ceo.lacounty.gov>; lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov; FifthDistrict@lacbos.org

Subject: Attn: Mira Loma Women's Jail Environmental Impact Report

Dear LA County Chief Exec Office and Board of Supervisors,

[Insert brief introductory message why you oppose jail]

Please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

A new LA county jail in Lancaster will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the County of Los Angeles, in extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

--

Debra Burrough
debraburrough@verizon.net
3600 E. 7th St.
Long Beach, California 90804

-----Original Message-----

From: sharon byers [mailto:sibyers@gmail.com]

Sent: Wednesday, January 06, 2016 4:42 PM

To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental <environmental@ceo.lacounty.gov>; lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov; FifthDistrict@lacbos.org

Subject: Attn: Mira Loma Women's Jail Environmental Impact Report

Dear LA County Chief Exec Office and Board of Supervisors,

[Insert brief introductory message why you oppose jail]

Please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

A new jail in Lancaster County will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the County of Los Angeles, in extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

--

sharon byers
sibyers@gmail.com

-----Original Message-----

From: Amanda Carlin [mailto:carlin2015@lawnet.ucla.edu]

Sent: Wednesday, January 06, 2016 2:35 PM

To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental <environmental@ceo.lacounty.gov>; lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov; FifthDistrict@lacbos.org

Subject: Attn: Mira Loma Women's Jail Environmental Impact Report

Dear LA County Chief Exec Office and Board of Supervisors,

Please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

A new jail in Lancaster County will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

Comment-1

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

Comment-2

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the County of Los Angeles, in extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

Comment-3

Comment-4

Comment-5

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

Comment-6

--

Amanda Carlin

carlin2015@lawnet.ucla.edu

Original Message-----

From: Emma Carpenter [mailto:emmarosecarp@icloud.com]

Sent: Tuesday, March 01, 2016 9:01 PM

To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental <environmental@ceo.lacounty.gov>; lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov; FifthDistrict@lacbos.org

Subject: Attn: Mira Loma Women's Jail Environmental Impact Report

Dear LA County Chief Exec Office and Board of Supervisors,

[Insert brief introductory message why you oppose jail]

Please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

A new LA county jail in Lancaster will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the County of Los Angeles, in extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

--

Emma Carpenter
emmarosecarp@icloud.com

Original Message-----

From: Toro Castano [mailto:mcastano@usc.edu]

Sent: Wednesday, January 06, 2016 2:06 PM

To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental <environmental@ceo.lacounty.gov>; lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov; FifthDistrict@lacbos.org

Subject: Attn: Mira Loma Women's Jail Environmental Impact Report

Dear LA County Chief Exec Office and Board of Supervisors,

[Insert brief introductory message why you oppose jail]

Please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

A new jail in Lancaster County will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the County of Los Angeles, in extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

--

Toro Castano
mcastano@usc.edu
1191 1/2 Loma Vista Drive
Long Beach, California 90813

-----Original Message-----

From: Violet Castellanos [mailto:Violet.castellanos@gmail.com]

Sent: Tuesday, March 01, 2016 9:32 PM

To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental <environmental@ceo.lacounty.gov>; lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov; FifthDistrict@lacbos.org

Subject: Attn: Mira Loma Women's Jail Environmental Impact Report

Dear LA County Chief Exec Office and Board of Supervisors,

Please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

A new LA county jail in Lancaster will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the County of Los Angeles, in extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

--

Violet Castellanos

Violet.castellanos@gmail.com

-----Original Message-----

From: jerome caton [mailto:jerome8591@yahoo.com]

Sent: Thursday, January 07, 2016 1:38 PM

To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental <environmental@ceo.lacounty.gov>; lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov; FifthDistrict@lacbos.org

Subject: Attn: Mira Loma Women's Jail Environmental Impact Report

Dear LA County Chief Exec Office and Board of Supervisors,

[Insert brief introductory message why you oppose jail]

Please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

A new LA county jail in Lancaster will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the County of Los Angeles, in extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

--

jerome caton

jerome8591@yahoo.com

4757 slauson#11

los angeles, California 90056

-----Original Message-----

From: Michelle Cho [mailto:xlafolot@yahoo.com]

Sent: Monday, February 29, 2016 4:54 PM

To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental <environmental@ceo.lacounty.gov>; lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov; FifthDistrict@lacbos.org

Subject: Attn: Mira Loma Women's Jail Environmental Impact Report

Dear LA County Chief Exec Office and Board of Supervisors,

[Insert brief introductory message why you oppose jail]

Please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

A new LA county jail in Lancaster will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the County of Los Angeles, in extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

--

Michelle Cho
xlafolot@yahoo.com

-----Original Message-----

From: Neha Choksi [mailto:nehabythesea@hotmail.com]

Sent: Wednesday, January 06, 2016 1:45 PM

To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental <environmental@ceo.lacounty.gov>; lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov; FifthDistrict@lacbos.org

Subject: Attn: Mira Loma Women's Jail Environmental Impact Report

Dear LA County Chief Exec Office and Board of Supervisors,

Please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

A new jail in Lancaster County will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the County of Los Angeles, in extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

--

Neha Choksi
nehabythesea@hotmail.com

-----Original Message-----

From: Mary Christian [mailto:mary.c2012@yahoo.com]

Sent: Sunday, February 07, 2016 7:00 AM

To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental <environmental@ceo.lacounty.gov>; lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov; FifthDistrict@lacbos.org

Subject: Attn: Mira Loma Women's Jail Environmental Impact Report

Dear LA County Chief Exec Office and Board of Supervisors,

[Insert brief introductory message why you oppose jail]

Please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

A new LA county jail in Lancaster will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction.

With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism.

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the County of Los Angeles, in extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

--

Mary Christian

mary.c2012@yahoo.com
3637 Wellington Road
Los Angeles, California 90016
Curb

-----Original Message-----

From: Thomas Clark [mailto:thomasclark92@gmail.com]

Sent: Wednesday, January 06, 2016 1:31 PM

To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental <environmental@ceo.lacounty.gov>; lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov; FifthDistrict@lacbos.org

Subject: Attn: Mira Loma Women's Jail Environmental Impact Report

Dear LA County Chief Exec Office and Board of Supervisors,

[Insert brief introductory message why you oppose jail]

Please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

A new jail in Lancaster County will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the County of Los Angeles, in extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

--

Thomas Clark
thomasclark92@gmail.com
245 Serrano Ave #214
Los Angeles, California 90004

From: Natalie Cohen <ncohen2@antioch.edu>
Sent: Thursday, February 04, 2016 1:01 PM
To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental;
lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-
Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov;
FifthDistrict@lacbos.org
Subject: Attn: Mira Loma Women's Jail Environmental Impact Report

Dear LA County Chief Exec Office and Board of Supervisors,

Please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

A new LA county jail in Lancaster will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the County of Los Angeles, in extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

--
Natalie Cohen
ncohen2@antioch.edu
90019
Antioch University Los Angeles

-----Original Message-----

From: Barbara Consbruck [mailto:bconsbruck@hotmail.com]

Sent: Wednesday, March 02, 2016 2:59 PM

To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental <environmental@ceo.lacounty.gov>; lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov; FifthDistrict@lacbos.org

Subject: Attn: Mira Loma Women's Jail Environmental Impact Report

Dear LA County Chief Exec Office and Board of Supervisors,

[Insert brief introductory message why you oppose jail]

Please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

A new LA county jail in Lancaster will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the County of Los Angeles, in extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

--

Barbara Consbruck
bconsbruck@hotmail.com
12252 Willowbend Ln
Sylmar, California 91342

-----Original Message-----

From: Susan Curtiss [mailto:scurtiss@ucla.edu]

Sent: Thursday, January 07, 2016 9:34 AM

To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental <environmental@ceo.lacounty.gov>; lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov; FifthDistrict@lacbos.org

Subject: Attn: Mira Loma Women's Jail Environmental Impact Report

Dear LA County Chief Exec Office and Board of Supervisors,

[Insert brief introductory message why you oppose jail]

Please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

A new jail in Lancaster County will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the County of Los Angeles, in extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

--

Susan Curtiss
scurtiss@ucla.edu
696 So. Bronson Ave.
Los Angeles, CA 90005

-----Original Message-----

From: Abraham Delgado [mailto:abrahamwilde@gmail.com]

Sent: Tuesday, March 01, 2016 9:16 PM

To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental <environmental@ceo.lacounty.gov>; lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov; FifthDistrict@lacbos.org

Subject: Attn: Mira Loma Women's Jail Environmental Impact Report

Dear LA County Chief Exec Office and Board of Supervisors,

Please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

A new LA county jail in Lancaster will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the County of Los Angeles, in extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

--

Abraham Delgado
abrahamwilde@gmail.com

829 South Lemon St.
Anaheim, CA 92805

-----Original Message-----

From: Jonathan Dubois [mailto:dubjonathan@gmail.com]

Sent: Tuesday, January 12, 2016 9:38 AM

To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental <environmental@ceo.lacounty.gov>; lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov; FifthDistrict@lacbos.org

Subject: Attn: Mira Loma Women's Jail Environmental Impact Report

Dear LA County Chief Exec Office and Board of Supervisors,

Please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

A new LA county jail in Lancaster will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the County of Los Angeles, in extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

--

Jonathan Dubois

dubjonathan@gmail.com

Los Angeles, California 90027

-----Original Message-----

From: Joan Easley [mailto:joaneasley@yahoo.com]

Sent: Tuesday, March 01, 2016 7:16 AM

To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental <environmental@ceo.lacounty.gov>; lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov; FifthDistrict@lacbos.org

Subject: Attn: Mira Loma Women's Jail Environmental Impact Report

Dear LA County Chief Exec Office and Board of Supervisors,

[Insert brief introductory message why you oppose jail]

Please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

A new LA county jail in Lancaster will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the County of Los Angeles, in extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

--

Joan Easley

joaneasley@yahoo.com

23015-1 Del Valle

Woodland Hills, CA 91364-1212

Ms.

-----Original Message-----

From: Elana Eden [mailto:elanaeden@gmail.com]

Sent: Saturday, February 06, 2016 12:59 PM

To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental <environmental@ceo.lacounty.gov>; lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov; FifthDistrict@lacbos.org

Subject: Attn: Mira Loma Women's Jail Environmental Impact Report

Dear LA County Chief Exec Office and Board of Supervisors,

Please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

A new LA county jail in Lancaster will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the County of Los Angeles, in extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

Sincerely,

Elana Eden

--

Elana Eden
elanaeden@gmail.com
6220 Maryland Dr.
Los Angeles, California 90048

-----Original Message-----

From: Elana Eden [mailto:elanaberlinerin@yahoo.de]

Sent: Tuesday, March 01, 2016 6:11 PM

To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental <environmental@ceo.lacounty.gov>; lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov; FifthDistrict@lacbos.org

Subject: Attn: Mira Loma Women's Jail Environmental Impact Report

Dear LA County Chief Exec Office and Board of Supervisors,

Please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

A new LA county jail in Lancaster will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the County of Los Angeles, in extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

--

Elana Eden
elanaberlinerin@yahoo.de

6220 Maryland Dr.
Los Angeles, CA 90048

From: WPrequest
Subject: FW: Attn: Mira Loma Women's Jail Environmental Impact Report

-----Original Message-----

From: Elana Eden [mailto:elanaberlinerin@yahoo.de]
Sent: Tuesday, March 01, 2016 6:11 PM
To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental <environmental@ceo.lacounty.gov>; lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov; FifthDistrict@lacbos.org
Subject: Attn: Mira Loma Women's Jail Environmental Impact Report

Dear LA County Chief Exec Office and Board of Supervisors,

Please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

A new LA county jail in Lancaster will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the County of Los Angeles, in extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

--
Elana Eden
elanaberlinerin@yahoo.de
6220 Maryland Dr.
Los Angeles, CA 90048

-----Original Message-----

From: Romina Estrada [mailto:haayitsromi@gmail.com]

Sent: Tuesday, March 01, 2016 9:08 PM

To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental <environmental@ceo.lacounty.gov>; lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov; FifthDistrict@lacbos.org

Subject: Attn: Mira Loma Women's Jail Environmental Impact Report

Dear LA County Chief Exec Office and Board of Supervisors,

[Insert brief introductory message why you oppose jail]

Please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

A new LA county jail in Lancaster will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the County of Los Angeles, in extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

--

Romina Estrada
haayitsromi@gmail.com
Coolhurst
Whittier, California 82922

-----Original Message-----

From: Michael W Evans [mailto:mikerain@earthlink.net]

Sent: Thursday, January 07, 2016 12:36 AM

To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental <environmental@ceo.lacounty.gov>; lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov; FifthDistrict@lacbos.org

Subject: Attn: Mira Loma Women's Jail Environmental Impact Report

Dear LA County Chief Exec Office and Board of Supervisors,

[Insert brief introductory message why you oppose jail]

Please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

A new jail in Lancaster County will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the County of Los Angeles, in extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

--

Michael W Evans
mikerain@earthlink.net
3731 S Sepulveda Blvd Apt 1
Los Angeles, California 90034

-----Original Message-----

From: Betty Fang [mailto:hellobettyfang@gmail.com]

Sent: Wednesday, January 06, 2016 1:23 PM

To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental <environmental@ceo.lacounty.gov>; lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov; FifthDistrict@lacbos.org

Subject: Attn: Mira Loma Women's Jail Environmental Impact Report

Dear LA County Chief Exec Office and Board of Supervisors,

Please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

A new jail in Lancaster County will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the County of Los Angeles, in extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

--

hellobettyfang@gmail.com

-----Original Message-----

From: miya folick [mailto:miya.folick@gmail.com]

Sent: Wednesday, January 06, 2016 3:10 PM

To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental <environmental@ceo.lacounty.gov>; lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov; FifthDistrict@lacbos.org

Subject: Attn: Mira Loma Women's Jail Environmental Impact Report

Dear LA County Chief Exec Office and Board of Supervisors,

[Insert brief introductory message why you oppose jail]

Please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

A new jail in Lancaster County will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the County of Los Angeles, in extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

--

miya folick
miya.folick@gmail.com

-----Original Message-----

From: Michael Forde [mailto: pipedr1954@gmail.com]

Sent: Wednesday, January 06, 2016 12:48 PM

To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental <environmental@ceo.lacounty.gov>; lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov; FifthDistrict@lacbos.org

Subject: Attn: Mira Loma Women's Jail Environmental Impact Report

Dear LA County Chief Exec Office and Board of Supervisors,

[Insert brief introductory message why you oppose jail]

Please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

A new jail in Lancaster County will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the County of Los Angeles, in extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

--

Michael Forde
pipedr1954@gmail.com
2308 Lime Ave
Long Beach, CA 90806

-----Original Message-----

From: Corrine Frohlich [mailto:corrifrohlich@gmail.com]

Sent: Wednesday, January 06, 2016 9:35 AM

To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental; lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov; FifthDistrict@lacbos.org

Subject: Attn: Mira Loma Women's Jail Environmental Impact Report

Dear LA County Chief Exec Office and Board of Supervisors,

Please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

A new jail in Lancaster County will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the County of Los Angeles, in extreme health

risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

--

Corrine Frohlich
corrifrohlich@gmail.com
552 A Elm Street
El Cerrito, California 94530

From: Roberta Frye <robertaf420@gmail.com>
Sent: Wednesday, February 03, 2016 4:07 PM
To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental;
lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-
Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov;
FifthDistrict@lacbos.org
Subject: Attn: Mira Loma Women's Jail Environmental Impact Report

Dear LA County Chief Exec Office and Board of Supervisors,

Please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

A new LA county jail in Lancaster will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the County of Los Angeles, in extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

--
Roberta Frye
robertaf420@gmail.com
90230

From: Emma G <emmajeanejumpingbean@msn.com>
Sent: Tuesday, February 09, 2016 6:46 PM
To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental;
lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-
Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov;
FifthDistrict@lacbos.org
Subject: Attn: Mira Loma Women's Jail Environmental Impact Report

Dear LA County Chief Exec Office and Board of Supervisors,

Please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

A new LA county jail in Lancaster will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the County of Los Angeles, in extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

--
Emma G
emmajeanejumpingbean@msn.com

Original Message-----

From: Sylvia Gentile [mailto:sgentile@gmail.com]

Sent: Monday, January 11, 2016 8:08 PM

To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental <environmental@ceo.lacounty.gov>; lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov; FifthDistrict@lacbos.org

Subject: Attn: Mira Loma Women's Jail Environmental Impact Report

Dear LA County Chief Exec Office and Board of Supervisors,

[Insert brief introductory message why you oppose jail]

Please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

A new LA county jail in Lancaster will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the County of Los Angeles, in extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

--

Sylvia Gentile

sgentile@gmail.com

2421 2nd St.

Santa Monica, California 90405

Ms.

-----Original Message-----

From: F. Gerayli [mailto:ferigerayli@yahoo.com]

Sent: Thursday, January 07, 2016 4:25 AM

To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental <environmental@ceo.lacounty.gov>; lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov; FifthDistrict@lacbos.org

Subject: Attn: Mira Loma Women's Jail Environmental Impact Report

Dear LA County Chief Exec Office and Board of Supervisors,

[Insert brief introductory message why you oppose jail]

Please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

A new jail in Lancaster County will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the County of Los Angeles, in extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

--

F. Gerayli
ferigerayli@yahoo.com

-----Original Message-----

From: Kim Glann [mailto:kimglann@me.com]

Sent: Tuesday, March 01, 2016 11:34 PM

To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental <environmental@ceo.lacounty.gov>; lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov; FifthDistrict@lacbos.org

Subject: Attn: Mira Loma Women's Jail Environmental Impact Report

Dear LA County Chief Exec Office and Board of Supervisors,

[Insert brief introductory message why you oppose jail]

Please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

A new LA county jail in Lancaster will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the County of Los Angeles, in extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

--

Kim Glann

-----Original Message-----

From: Sonia Gonzalez [mailto:songonza1@gmail.com]

Sent: Monday, February 29, 2016 2:35 PM

To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental <environmental@ceo.lacounty.gov>; lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov; FifthDistrict@lacbos.org

Subject: Attn: Mira Loma Women's Jail Environmental Impact Report

Dear LA County Chief Exec Office and Board of Supervisors,

[Insert brief introductory message why you oppose jail]

Please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

A new LA county jail in Lancaster will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the County of Los Angeles, in extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

--

Sonia Gonzalez
songonza1@gmail.com

Original Message-----

From: Sean Gonzalez [mailto:seanzalez@gmail.com]

Sent: Wednesday, January 06, 2016 5:51 PM

To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental <environmental@ceo.lacounty.gov>; lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov; FifthDistrict@lacbos.org

Subject: Attn: Mira Loma Women's Jail Environmental Impact Report

Dear LA County Chief Exec Office and Board of Supervisors,

[Insert brief introductory message why you oppose jail]

Please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

A new jail in Lancaster County will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the County of Los Angeles, in extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

--

Sean Gonzalez

seanzalez@gmail.com

6814 Palm Dr.

Rancho Cucamonga, California 91701

-----Original Message-----

From: Rosa Gonzalez [mailto:rgonz025@ucr.edu]

Sent: Wednesday, March 02, 2016 11:47 AM

To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental <environmental@ceo.lacounty.gov>; lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov; FifthDistrict@lacbos.org

Subject: Attn: Mira Loma Women's Jail Environmental Impact Report

Dear LA County Chief Exec Office and Board of Supervisors,

Please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

A new LA county jail in Lancaster will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the County of Los Angeles, in extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

--

Rosa Gonzalez
rgonz025@ucr.edu

-----Original Message-----

From: Carolina Goodman [mailto:dgcg2@sbcglobal.net]

Sent: Wednesday, January 06, 2016 3:24 PM

To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental <environmental@ceo.lacounty.gov>; lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov; FifthDistrict@lacbos.org

Subject: Attn: Mira Loma Women's Jail Environmental Impact Report

Dear LA County Chief Exec Office and Board of Supervisors,

[Insert brief introductory message why you oppose jail]

Please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

A new jail in Lancaster County will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the County of Los Angeles, in extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

--

Carolina Goodman
dgcg2@sbcglobal.net

-----Original Message-----

From: Elizabeth Gordon [mailto:ellie.ava.gordon@gmail.com]

Sent: Tuesday, March 01, 2016 9:50 PM

To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental <environmental@ceo.lacounty.gov>; lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov; FifthDistrict@lacbos.org

Subject: Attn: Mira Loma Women's Jail Environmental Impact Report

Dear LA County Chief Exec Office and Board of Supervisors,

Please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

A new LA county jail in Lancaster will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the County of Los Angeles, in extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

--

Elizabeth Gordon
ellie.ava.gordon@gmail.com
2430 Kenilworth Ave.

Los Angeles, CA 90039

-----Original Message-----

From: MARCIA GRAVES [mailto:donotreply@wordpress.com]

Sent: Wednesday, January 06, 2016 10:46 PM

To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental <environmental@ceo.lacounty.gov>; lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov; FifthDistrict@lacbos.org

Subject: Attn: Mira Loma Women's Jail, Environmental Impact Report

Name: MARCIA GRAVES

Email: marciaagraves@gmail.com

Address: 3302 W 48TH ST

City: LOS ANGELES

State: CA

Zip Code: 90043

Comment (please personalize): Dear LA County Chief Exec Office and Board of Supervisors,

~ Insert brief introductory message why you oppose jail ~

Please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

A new jail in Lancaster County will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the County of Los Angeles, in extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

Time: January 7, 2016 at 6:46 am

IP Address: 104.32.74.136

Contact Form URL: <http://lanomorejails.org/2016/01/05/urgent-submit-comment-now-against-proposed-new-la-county-jail/>

Sent by an unverified visitor to your site.

-----Original Message-----

From: Marcia Graves [mailto:marciaagraves@gmail.com]

Sent: Tuesday, January 12, 2016 12:06 PM

To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental <environmental@ceo.lacounty.gov>; lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov; FifthDistrict@lacbos.org

Subject: Attn: Mira Loma Women's Jail Environmental Impact Report

Dear LA County Chief Exec Office and Board of Supervisors,

[Insert brief introductory message why you oppose jail]

Please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

A new LA county jail in Lancaster will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the County of Los Angeles, in extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

--

Marcia Graves
marciaagraves@gmail.com
power box 452581
los angeles, California 90045
move on

-----Original Message-----

From: Catherine Gudis [mailto:Cagudis@ucr.edu]

Sent: Tuesday, January 12, 2016 8:29 PM

To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental <environmental@ceo.lacounty.gov>; lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov; FifthDistrict@lacbos.org

Subject: Attn: Mira Loma Women's Jail Environmental Impact Report

Dear LA County Chief Exec Office and Board of Supervisors,

[Insert brief introductory message why you oppose jail]

Please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

A new LA county jail in Lancaster will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the County of Los Angeles, in extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

--

Catherine Gudis
Cagudis@ucr.edu
1342 Lucile Avenue
LA, CA 90026

From: Susan Hathaway <susanhathaway@earthlink.net>
Sent: Friday, February 05, 2016 12:42 PM
To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental;
lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-
Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov;
FifthDistrict@lacbos.org
Subject: Attn: Mira Loma Women's Jail Environmental Impact Report

Dear LA County Chief Exec Office and Board of Supervisors,

I ask you to consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

A new LA county jail in Lancaster will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the County of Los Angeles, in extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

--

Susan Hathaway
susanhathaway@earthlink.net
5107 Passons Boulevard #313
Pico Rivera, CA 90660

-----Original Message-----

From: Rodrigo Heng-Lehtinen [mailto:rodrigolehtinen@gmail.com]

Sent: Monday, February 29, 2016 5:58 PM

To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental <environmental@ceo.lacounty.gov>; lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov; FifthDistrict@lacbos.org

Subject: Attn: Mira Loma Women's Jail Environmental Impact Report

Dear LA County Chief Exec Office and Board of Supervisors,

Please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

A new LA county jail in Lancaster will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the County of Los Angeles, in extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

--

Rodrigo Heng-Lehtinen
rodrigolehtinen@gmail.com

From: Diane Henry <henrydchenry83@gmail.com>
Sent: Friday, February 26, 2016 9:18 PM
To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental;
lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-
Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov;
FifthDistrict@lacbos.org
Subject: Attn: Mira Loma Women's Jail Environmental Impact Report

Dear LA County Chief Exec Office and Board of Supervisors,

[Insert brief introductory message why you oppose jail]

Please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

A new LA county jail in Lancaster will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the County of Los Angeles, in extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

--
Diane Henry
henrydchenry83@gmail.com

-----Original Message-----

From: Alicia Higuera [mailto:ahiguera1313@gmail.com]

Sent: Monday, February 29, 2016 12:57 PM

To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental <environmental@ceo.lacounty.gov>; lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov; FifthDistrict@lacbos.org

Subject: Attn: Mira Loma Women's Jail Environmental Impact Report

Dear LA County Chief Exec Office and Board of Supervisors,

[Insert brief introductory message why you oppose jail]

Please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

A new LA county jail in Lancaster will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the County of Los Angeles, in extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

--

Alicia Higuera
ahiguera1313@gmail.com
15741Blaine Avenue #13
Bellflower , california 90706

-----Original Message-----

From: Claire Hirschberg [mailto:Clairehirschberg@gmail.com]

Sent: Tuesday, January 12, 2016 12:22 PM

To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental <environmental@ceo.lacounty.gov>; lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov; FifthDistrict@lacbos.org

Subject: Attn: Mira Loma Women's Jail Environmental Impact Report

Dear LA County Chief Exec Office and Board of Supervisors,

Please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

A new LA county jail in Lancaster will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the County of Los Angeles, in extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

--

Claire Hirschberg
Clairehirschberg@gmail.com
331 1/4 n heliotrope drive

Los Angeles , CA 90004

-----Original Message-----

From: Jen Hofer [mailto:jenhofer@gmail.com]

Sent: Monday, January 11, 2016 3:52 PM

To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental <environmental@ceo.lacounty.gov>; lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov; FifthDistrict@lacbos.org

Subject: Attn: Mira Loma Women's Jail Environmental Impact Report

Dear LA County Chief Exec Office and Board of Supervisors,

Please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

I believe Los Angeles County should put resources toward alternatives to incarceration, rather than building more jails. I specifically oppose the proposed Mira Loma jail for a variety of reasons, both environmental and humane. Incarcerated women -- and all incarcerated people -- deserve to receive frequent visits from family and friends, and the location of the proposed new jail will make that extremely difficult, and in some cases impossible. Further, the proposed jail poses numerous environmental hazards.

A new LA county jail in Lancaster will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the County of Los Angeles, in extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

Respectfully,

Jen Hofer

--

Jen Hofer
jenhofer@gmail.com
2905 Elm Street
Los Angeles, California (CA) 90065-1966

-----Original Message-----

From: Celeste Hong [mailto:celestehong@earthlink.net]

Sent: Thursday, January 07, 2016 12:37 AM

To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental <environmental@ceo.lacounty.gov>; lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov; FifthDistrict@lacbos.org

Subject: Attn: Mira Loma Women's Jail Environmental Impact Report

Dear LA County Chief Exec Office and Board of Supervisors,

[Insert brief introductory message why you oppose jail]

Please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

A new jail in Lancaster County will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the County of Los Angeles, in extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

--

Celeste Hong
celestehong@earthlink.net
Select

Original Message-----

From: Morgan Humphrey [mailto:melle1237@gmail.com]

Sent: Wednesday, January 06, 2016 2:13 PM

To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental <environmental@ceo.lacounty.gov>; lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov; FifthDistrict@lacbos.org

Subject: Attn: Mira Loma Women's Jail Environmental Impact Report

Dear LA County Chief Exec Office and Board of Supervisors,

[Insert brief introductory message why you oppose jail]

Please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

A new jail in Lancaster County will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the County of Los Angeles, in extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

--

Morgan Humphrey
melle1237@gmail.com

-----Original Message-----

From: Trinity Jackson [mailto:trinityaj23@gmail.com]

Sent: Tuesday, March 01, 2016 9:09 PM

To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental <environmental@ceo.lacounty.gov>; lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov; FifthDistrict@lacbos.org

Subject: Attn: Mira Loma Women's Jail Environmental Impact Report

Dear LA County Chief Exec Office and Board of Supervisors,

Please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

A new LA county jail in Lancaster will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the County of Los Angeles, in extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

--

Trinity Jackson
trinityaj23@gmail.com
W Bolivar Ave

Milwaukee, Wisconsin 53207
N/A

-----Original Message-----

From: darynne jessler [mailto:darynnej@yahoo.com]

Sent: Monday, February 29, 2016 12:35 PM

To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental <environmental@ceo.lacounty.gov>; lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov; FifthDistrict@lacbos.org

Subject: Attn: Mira Loma Women's Jail Environmental Impact Report

Dear LA County Chief Exec Office and Board of Supervisors,

[Insert brief introductory message why you oppose jail]

Please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

A new LA county jail in Lancaster will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the County of Los Angeles, in extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

--

darynne jessler
darynnej@yahoo.com

Original Message-----

From: Julie Johnson [mailto:juliekrt@gmail.com]

Sent: Tuesday, January 12, 2016 12:24 PM

To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental <environmental@ceo.lacounty.gov>; lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov; FifthDistrict@lacbos.org

Subject: Attn: Mira Loma Women's Jail Environmental Impact Report

Dear LA County Chief Exec Office and Board of Supervisors,

[Insert brief introductory message why you oppose jail]

Please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

A new LA county jail in Lancaster will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the County of Los Angeles, in extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

--

Julie Johnson
juliekr@gmail.com
29121 Pompano Wat
Laguna Niguel, CA 92677

-----Original Message-----

From: jenna johnson [mailto:kewleojenn@yahoo.com]

Sent: Tuesday, March 01, 2016 9:42 PM

To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental <environmental@ceo.lacounty.gov>; lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov; FifthDistrict@lacbos.org

Subject: Attn: Mira Loma Women's Jail Environmental Impact Report

Dear LA County Chief Exec Office and Board of Supervisors,

[Insert brief introductory message why you oppose jail]

Please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

A new LA county jail in Lancaster will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the County of Los Angeles, in extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

--

jenna johnson
kewleojenn@yahoo.com

-----Original Message-----

From: Karen Jones [mailto:khjones1949@yahoo.com]

Sent: Monday, February 29, 2016 1:44 PM

To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental <environmental@ceo.lacounty.gov>; lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov; FifthDistrict@lacbos.org

Subject: Attn: Mira Loma Women's Jail Environmental Impact Report

Dear LA County Chief Exec Office and Board of Supervisors,

[Insert brief introductory message why you oppose jail]

We need more social services to help women, higher wages so they support themselves and subsidized child care so they can work and know their children are safe. We DO NOT need more jails for women, or men. This is a terrible idea and I do not want my tax dollars to go to punishing women who, if not for desperation and dire circumstances, would probably not have found themselves in trouble. NO NEW JAIL.

Please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

A new LA county jail in Lancaster will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the County of Los Angeles, in extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After

completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

--

Karen Jones

khjones1949@yahoo.com

-----Original Message-----

From: Marilyn Katz [mailto:samandvenu@mindspring.com]

Sent: Monday, February 29, 2016 12:36 PM

To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental <environmental@ceo.lacounty.gov>; lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov; FifthDistrict@lacbos.org

Subject: Attn: Mira Loma Women's Jail Environmental Impact Report

Dear LA County Chief Exec Office and Board of Supervisors,

[Insert brief introductory message why you oppose jail]

This jail will only help the one percent that build or own it and will not rehabilitate the women and will harm the jailed women and their families. Rehabilitate don't incarcerate.

Please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

A new LA county jail in Lancaster will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the County of Los Angeles, in extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

--

Marilyn Katz
samandvenu@mindspring.com

-----Original Message-----

From: Elizabeth Kempf [mailto:beth.horsesense@gmail.com]

Sent: Thursday, January 07, 2016 8:16 AM

To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental <environmental@ceo.lacounty.gov>; lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov; FifthDistrict@lacbos.org

Subject: Attn: Mira Loma Women's Jail Environmental Impact Report

Dear LA County Chief Exec Office and Board of Supervisors,

[Insert brief introductory message why you oppose jail]

Please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

A new jail in Lancaster County will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the County of Los Angeles, in extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

--

Elizabeth Kempf
beth.horsesense@gmail.com
Ventura Blvd
canoga Park, California

Original Message-----

From: Amanda Kempfues [mailto:akempfues@antioch.edu]

Sent: Wednesday, January 06, 2016 1:43 PM

To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental <environmental@ceo.lacounty.gov>; lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov; FifthDistrict@lacbos.org

Subject: Attn: Mira Loma Women's Jail Environmental Impact Report

Dear LA County Chief Exec Office and Board of Supervisors,

[Insert brief introductory message why you oppose jail]

Please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

A new jail in Lancaster County will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the County of Los Angeles, in extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

--

Amanda Kempfues
akempfues@antioch.edu
12752 Longworth Ave
Norwalk, California 90650

-----Original Message-----

From: Gina Kim [mailto:mortimermoriarty@yahoo.com]

Sent: Wednesday, January 06, 2016 7:25 PM

To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental <environmental@ceo.lacounty.gov>; lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov; FifthDistrict@lacbos.org

Subject: Attn: Mira Loma Women's Jail Environmental Impact Report

Dear LA County Chief Exec Office and Board of Supervisors,

Please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

A new jail in Lancaster County will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the County of Los Angeles, in extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

--

Gina Kim

mortimermoriarty@yahoo.com

1057 S. Kingsley Dr. Apt. #1

Los Angeles, CA - California 90006

-----Original Message-----

From: Jeanette L [mailto:Jeanette135@yahoo.com]

Sent: Wednesday, January 06, 2016 7:14 PM

To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental <environmental@ceo.lacounty.gov>; lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov; FifthDistrict@lacbos.org

Subject: Attn: Mira Loma Women's Jail Environmental Impact Report

Dear LA County Chief Exec Office and Board of Supervisors,

Please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

A new jail in Lancaster County will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the County of Los Angeles, in extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

--

Jeanette L

Jeanette135@yahoo.com

-----Original Message-----

From: Grace Lacques [mailto:glacques@gmail.com]

Sent: Thursday, January 07, 2016 8:47 AM

To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental <environmental@ceo.lacounty.gov>; lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov; FifthDistrict@lacbos.org

Subject: Attn: Mira Loma Women's Jail Environmental Impact Report

Dear LA County Chief Exec Office and Board of Supervisors,

[Insert brief introductory message why you oppose jail]

Please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

A new jail in Lancaster County will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the County of Los Angeles, in extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

--

Grace Lacques
glacques@gmail.com
1100 S. Cloverdale Ave.
Los Angeles, California (CA) 90019

-----Original Message-----

From: Kristen Leahy [mailto:ksleahy@gmail.com]

Sent: Wednesday, January 06, 2016 9:49 PM

To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental <environmental@ceo.lacounty.gov>; lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov; FifthDistrict@lacbos.org

Subject: Attn: Mira Loma Women's Jail Environmental Impact Report

Dear LA County Chief Exec Office and Board of Supervisors,

[Insert brief introductory message why you oppose jail]

Please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

A new jail in Lancaster County will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the County of Los Angeles, in extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

--

Kristen Leahy

ksleahy@gmail.com

439 S St Andrews Pl

Los Angeles, California 90020

-----Original Message-----

From: Gabrielle Leandro [mailto:Jk10gab1p@yahoo.com]

Sent: Wednesday, January 06, 2016 7:05 PM

To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental <environmental@ceo.lacounty.gov>; lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov; FifthDistrict@lacbos.org

Subject: Attn: Mira Loma Women's Jail Environmental Impact Report

Dear LA County Chief Exec Office and Board of Supervisors,

[Insert brief introductory message why you oppose jail]

Please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

A new jail in Lancaster County will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the County of Los Angeles, in extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

--

Gabrielle Leandro
Jk10gab1p@yahoo.com

-----Original Message-----

From: Andrew Lee [mailto:andrewclee91@gmail.com]

Sent: Wednesday, January 06, 2016 4:21 PM

To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental <environmental@ceo.lacounty.gov>; lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov; FifthDistrict@lacbos.org

Subject: Attn: Mira Loma Women's Jail Environmental Impact Report

Dear LA County Chief Exec Office and Board of Supervisors,

Please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

A new jail in Lancaster County will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the County of Los Angeles, in extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

--

Andrew Lee
andrewclee91@gmail.com

12931 Dawn Drive
Cerritos, CA 90703

From: gil leib <gil16@verizon.net>
Sent: Wednesday, February 03, 2016 6:09 PM
To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental; lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov; FifthDistrict@lacbos.org
Subject: Attn: Mira Loma Women's Jail Environmental Impact Report

Dear LA County Chief Exec Office and Board of Supervisors,

[Insert brief introductory message why you oppose jail]

Please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

A new LA county jail in Lancaster will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the County of Los Angeles, in extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

--
gil leib
gil16@verizon.net
601 California Ave
Santa Monica, CA 90403

N/A

Original Message-----

From: Juliette Lett [mailto:Jujulett@yahoo.com]

Sent: Monday, February 29, 2016 2:45 PM

To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental <environmental@ceo.lacounty.gov>; lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov; FifthDistrict@lacbos.org

Subject: Attn: Mira Loma Women's Jail Environmental Impact Report

Dear LA County Chief Exec Office and Board of Supervisors,

[Insert brief introductory message why you oppose jail]

Please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

A new LA county jail in Lancaster will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the County of Los Angeles, in extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

--

Juliette Lett

Jujulett@yahoo.com

904 E. 83rd St

Los Angeles, California 90001

All Of Us Or None

-----Original Message-----

From: Zoila Linares [mailto:Zoila.linares14@gmail.com]

Sent: Wednesday, January 06, 2016 6:03 PM

To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental <environmental@ceo.lacounty.gov>; lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov; FifthDistrict@lacbos.org

Subject: Attn: Mira Loma Women's Jail Environmental Impact Report

Dear LA County Chief Exec Office and Board of Supervisors,

[Insert brief introductory message why you oppose jail]

Please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

A new jail in Lancaster County will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the County of Los Angeles, in extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

--

Zoila Linares

Zoila.linares14@gmail.com

229 1/2 Rosemont Ave

Los Angeles, California 90026

-----Original Message-----

From: Brandy Lintecum [mailto:poetry@phoenixpoet.com]

Sent: Tuesday, March 01, 2016 1:08 PM

To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental <environmental@ceo.lacounty.gov>; lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov; FifthDistrict@lacbos.org

Subject: Attn: Mira Loma Women's Jail Environmental Impact Report

Dear LA County Chief Exec Office and Board of Supervisors,

[Insert brief introductory message why you oppose jail]

Please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

A new LA county jail in Lancaster will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the County of Los Angeles, in extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

--

Brandy Lintecum
poetry@phoenixpoet.com

-----Original Message-----

From: BONNIE LONG [mailto:bonnie8888@aol.com]
Sent: Monday, February 29, 2016 4:18 PM
To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental <environmental@ceo.lacounty.gov>; lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov; FifthDistrict@lacbos.org
Subject: Attn: Mira Loma Women's Jail Environmental Impact Report

Dear LA County Chief Exec Office and Board of Supervisors,

[Insert brief introductory message why you oppose jail]

Please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

A new LA county jail in Lancaster will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the County of Los Angeles, in extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

--

BONNIE LONG

bonnie8888@aol.com

2 - 36th Place, #C

Long Beach, CA 90803-8608

Statewide Inmate Family Council

-----Original Message-----

From: Cesia Dominguez Lopez [mailto:cesia.dominguez27@gmail.com]

Sent: Friday, January 08, 2016 6:15 PM

To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental <environmental@ceo.lacounty.gov>; lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov; FifthDistrict@lacbos.org

Subject: Attn: Mira Loma Women's Jail Environmental Impact Report

Dear LA County Chief Exec Office and Board of Supervisors,

Please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

A new LA county jail in Lancaster will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the County of Los Angeles, in extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

--

Cesia Dominguez Lopez
cesia.dominguez27@gmail.com
1921 Pennsylvania Ave

Los Angeles, CA 90033

-----Original Message-----

From: Crystal Lopez [mailto:Cristie94@gmail.com]

Sent: Wednesday, January 06, 2016 5:46 PM

To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental <environmental@ceo.lacounty.gov>; lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov; FifthDistrict@lacbos.org

Subject: Attn: Mira Loma Women's Jail Environmental Impact Report

Dear LA County Chief Exec Office and Board of Supervisors,

[Insert brief introductory message why you oppose jail]

Please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

A new jail in Lancaster County will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the County of Los Angeles, in extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

--

Crystal Lopez
Cristie94@gmail.com

-----Original Message-----

From: Lillian Luu [mailto:Sprinklilly@yahoo.com]

Sent: Wednesday, January 06, 2016 6:46 PM

To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental <environmental@ceo.lacounty.gov>; lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov; FifthDistrict@lacbos.org

Subject: Attn: Mira Loma Women's Jail Environmental Impact Report

Dear LA County Chief Exec Office and Board of Supervisors,

Please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

A new jail in Lancaster County will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the County of Los Angeles, in extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

--

Lillian Luu
Sprinklilly@yahoo.com

-----Original Message-----

From: morgan macrae [mailto:mocrayfish2222@gmail.com]

Sent: Tuesday, January 12, 2016 6:30 PM

To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental <environmental@ceo.lacounty.gov>; lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov; FifthDistrict@lacbos.org

Subject: Attn: Mira Loma Women's Jail Environmental Impact Report

Dear LA County Chief Exec Office and Board of Supervisors,

[Insert brief introductory message why you oppose jail]

Please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

A new LA county jail in Lancaster will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the County of Los Angeles, in extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

--

morgan macrae
mocrayfish2222@gmail.com
25 washington ave
pittsford, NY 14534

-----Original Message-----

From: Hayley Marcus [mailto:heyhayley@icloud.com]

Sent: Wednesday, January 06, 2016 12:42 PM

To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental <environmental@ceo.lacounty.gov>; lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov; FifthDistrict@lacbos.org

Subject: Attn: Mira Loma Women's Jail Environmental Impact Report

Dear LA County Chief Exec Office and Board of Supervisors,

[Insert brief introductory message why you oppose jail]

Please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

A new jail in Lancaster County will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the County of Los Angeles, in extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

--

Hayley Marcus
heyhayley@icloud.com

-----Original Message-----

From: Amir Mardani [mailto:vonen@yahoo.com]

Sent: Thursday, January 07, 2016 4:23 AM

To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental <environmental@ceo.lacounty.gov>; lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov; FifthDistrict@lacbos.org

Subject: Attn: Mira Loma Women's Jail Environmental Impact Report

Dear LA County Chief Exec Office and Board of Supervisors,

Please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

A new jail in Lancaster County will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the County of Los Angeles, in extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

--

Amir Mardani
vonen@yahoo.com

-----Original Message-----

From: Brenda Marquez [mailto:marquezbrenda13@yahoo.com]

Sent: Wednesday, January 06, 2016 5:56 PM

To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental <environmental@ceo.lacounty.gov>; lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov; FifthDistrict@lacbos.org

Subject: Attn: Mira Loma Women's Jail Environmental Impact Report

Dear LA County Chief Exec Office and Board of Supervisors,

[Insert brief introductory message why you oppose jail]

Please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

A new jail in Lancaster County will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the County of Los Angeles, in extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

--

Brenda Marquez
marquezbrenda13@yahoo.com
2778 CST #8
San Diego, California 92102

-----Original Message-----

From: Susan McCorry [mailto:smcpistil@aol.com]

Sent: Friday, January 08, 2016 2:55 PM

To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental <environmental@ceo.lacounty.gov>; lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov; FifthDistrict@lacbos.org

Subject: Attn: Mira Loma Women's Jail Environmental Impact Report

Dear LA County Chief Exec Office and Board of Supervisors,

[Insert brief introductory message why you oppose jail]

Please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

A new LA county jail in Lancaster will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the County of Los Angeles, in extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

--

Susan McCorry
smcpistil@aol.com
230 Pacific Street # 108
Santa Monica, CA 90405

From: Evan McDermit <evanmcdermit@gmail.com>
Sent: Friday, February 05, 2016 2:16 PM
To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental;
lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-
Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov;
FifthDistrict@lacbos.org
Subject: Attn: Mira Loma Women's Jail Environmental Impact Report

Dear LA County Chief Exec Office and Board of Supervisors,

[Insert brief introductory message why you oppose jail]

Please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

A new LA county jail in Lancaster will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the County of Los Angeles, in extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

--
Evan McDermit
evanmcdermit@gmail.com
608 Golden Ave.
Fullerton, CA 92832

Mr.

Original Message-----

From: Maureen McGee [mailto:milder.mcgee@verizon.net]

Sent: Tuesday, January 12, 2016 1:23 PM

To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental <environmental@ceo.lacounty.gov>; lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov; FifthDistrict@lacbos.org

Subject: Attn: Mira Loma Women's Jail Environmental Impact Report

Dear LA County Chief Exec Office and Board of Supervisors,

[Insert brief introductory message why you oppose jail]

Please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

A new LA county jail in Lancaster will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the County of Los Angeles, in extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

--

Maureen McGee
milder.mcgee@verizon.net
790 Alma Real Drive
Pacific Palisades, CA 90272

-----Original Message-----

From: Mariana Mendoza [mailto:mariana@enlaceintl.org]

Sent: Wednesday, January 06, 2016 1:32 PM

To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental <environmental@ceo.lacounty.gov>; lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov; FifthDistrict@lacbos.org

Subject: Attn: Mira Loma Women's Jail Environmental Impact Report

Dear LA County Chief Exec Office and Board of Supervisors,

[Insert brief introductory message why you oppose jail]

Please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

A new jail in Lancaster County will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the County of Los Angeles, in extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

--

Mariana Mendoza
mariana@enlaceintl.org
Los Angeles, CA 90010

-----Original Message-----

From: Mirian Meux [mailto:Miriam5nce@gmail.com]

Sent: Wednesday, January 06, 2016 1:23 PM

To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental <environmental@ceo.lacounty.gov>; lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov; FifthDistrict@lacbos.org

Subject: Attn: Mira

Office and Board of Supervisors,
Loma Women's Jail Environmental Impact Report

Dear LA County Chief Exec

[Insert brief introductory message why you oppose jail]

Please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

A new jail in Lancaster County will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the County of Los Angeles, in extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

--

Mirian Meux
Miriam5nce@gmail.com
Los Angeles , CA

-----Original Message-----

From: Sarah Meyn [mailto:Sarahemilliephotos@hotmail.com]

Sent: Tuesday, March 01, 2016 10:24 PM

To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental <environmental@ceo.lacounty.gov>; lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov; FifthDistrict@lacbos.org

Subject: Attn: Mira Loma Women's Jail Environmental Impact Report

Dear LA County Chief Exec Office and Board of Supervisors,

[Insert brief introductory message why you oppose jail]

Please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

A new LA county jail in Lancaster will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the County of Los Angeles, in extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

--

Sarah Meyn

Sarahemilliephotos@hotmail.com

-----Original Message-----

From: Ashley Miller [mailto:ashleyannmichaels@ymail.com]

Sent: Monday, February 29, 2016 2:54 PM

To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental <environmental@ceo.lacounty.gov>; lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov; FifthDistrict@lacbos.org

Subject: Attn: Mira Loma Women's Jail Environmental Impact Report

Dear LA County Chief Exec Office and Board of Supervisors,

[Insert brief introductory message why you oppose jail]

Please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

A new LA county jail in Lancaster will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the County of Los Angeles, in extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

--

Ashley Miller
ashleyannmichaels@ymail.com
18375 Ventura Blvd. #289
Tarzana, CA 91356

-----Original Message-----

From: Victoria Miller [mailto:vemiller@earthlink.net]

Sent: Wednesday, January 06, 2016 12:53 PM

To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental <environmental@ceo.lacounty.gov>; lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov; FifthDistrict@lacbos.org

Subject: Attn: Mira Loma Women's Jail Environmental Impact Report

Dear LA County Chief Exec Office and Board of Supervisors,

[Insert brief introductory message why you oppose jail]

Please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

A new jail in Lancaster County will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the County of Los Angeles, in extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

--

Victoria Miller
vemiller@earthlink.net
15857 Moorpark Street
Encino, CA 91436

-----Original Message-----

From: Nydya Mora [mailto:Nydyam@gmail.com]

Sent: Tuesday, March 01, 2016 9:23 PM

To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental <environmental@ceo.lacounty.gov>; lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov; FifthDistrict@lacbos.org

Subject: Attn: Mira Loma Women's Jail Environmental Impact Report

Dear LA County Chief Exec Office and Board of Supervisors,

Please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

A new LA county jail in Lancaster will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the County of Los Angeles, in extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

--

Nydyam Mora
Nydyam@gmail.com
7009 San Rafael street

Paramount , Ca 90723

Original Message-----

From: Patricia Morton [mailto:pamorton@ix.netcom.com]

Sent: Tuesday, March 01, 2016 10:06 AM

To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental <environmental@ceo.lacounty.gov>; lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov; FifthDistrict@lacbos.org

Subject: Attn: Mira Loma Women's Jail Environmental Impact Report

Dear LA County Chief Exec Office and Board of Supervisors,

[Insert brief introductory message why you oppose jail]

Please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

A new LA county jail in Lancaster will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the County of Los Angeles, in extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR should not be approved.

--

Patricia Morton

pamorton@ix.netcom.com
4400 Brunswick Ave
Los Angeles, CA 90039

-----Original Message-----

From: Jessica Moss [mailto:jmoss27@gmail.com]

Sent: Wednesday, January 06, 2016 12:40 PM

To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental <environmental@ceo.lacounty.gov>; lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov; FifthDistrict@lacbos.org

Subject: Attn: Mira Loma Women's Jail Environmental Impact Report

Dear LA County Chief Exec Office and Board of Supervisors,

[Insert brief introductory message why you oppose jail]

Please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

A new jail in Lancaster County will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the County of Los Angeles, in extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

--

Jessica Moss
jmoss27@gmail.com
3650 Regal Place
Los Angeles, California 90068

-----Original Message-----

From: Veronica Padilla [mailto:bolis31@yahoo.com]

Sent: Friday, January 08, 2016 3:41 PM

To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental <environmental@ceo.lacounty.gov>; lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov; FifthDistrict@lacbos.org

Subject: Attn: Mira Loma Women's Jail Environmental Impact Report

Dear LA County Chief Exec Office and Board of Supervisors,

[Insert brief introductory message why you oppose jail]

Please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

A new LA county jail in Lancaster will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the County of Los Angeles, in extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

--

Veronica Padilla
bolis31@yahoo.com
14166 Oro Grande Street

-----Original Message-----

From: David Payant [mailto:Dapayant@gmail.com]

Sent: Tuesday, March 01, 2016 9:35 PM

To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental <environmental@ceo.lacounty.gov>; lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov; FifthDistrict@lacbos.org

Subject: Attn: Mira Loma Women's Jail Environmental Impact Report

Dear LA County Chief Exec Office and Board of Supervisors,

Please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

A new LA county jail in Lancaster will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the County of Los Angeles, in extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

--

David Payant
Dapayant@gmail.com

Original Message-----

From: Suzanne Pena [mailto:iamsaturnine@yahoo.com]

Sent: Wednesday, January 06, 2016 2:22 PM

To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental <environmental@ceo.lacounty.gov>; lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov; FifthDistrict@lacbos.org

Subject: Attn: Mira Loma Women's Jail Environmental Impact Report

Dear LA County Chief Exec Office and Board of Supervisors,

Please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

A new jail in Lancaster County will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the County of Los Angeles, in extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

--

Suzanne Pena
iamsaturnine@yahoo.com
2407 Ivy Pl

Fullerton, California 92835

Original Message-----

From: Morgan Peters [mailto:menschschreck@yahoo.com]

Sent: Tuesday, March 01, 2016 10:08 AM

To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental <environmental@ceo.lacounty.gov>; lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov; FifthDistrict@lacbos.org

Subject: Attn: Mira Loma Women's Jail Environmental Impact Report

Dear LA County Chief Exec Office and Board of Supervisors,

[Insert brief introductory message why you oppose jail]

Please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

A new LA county jail in Lancaster will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the County of Los Angeles, in extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

--

Morgan Peters
menschschreck@yahoo.com
1758 Winona Blvd.
Los Angeles, California 90027
Ms.

-----Original Message-----

From: Frida Ramirez [mailto:Fridamour12@gmail.com]

Sent: Monday, January 11, 2016 12:30 PM

To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental <environmental@ceo.lacounty.gov>; lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov; FifthDistrict@lacbos.org

Subject: Attn: Mira Loma Women's Jail Environmental Impact Report

Dear LA County Chief Exec Office and Board of Supervisors,

[Insert brief introductory message why you oppose jail]

Please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

A new LA county jail in Lancaster will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the County of Los Angeles, in extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

--

Frida Ramirez

Fridamour12@gmail.com

-----Original Message-----

From: Luis Reyes [mailto:Luisrb7@hotmail.com]

Sent: Thursday, January 07, 2016 8:15 AM

To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental <environmental@ceo.lacounty.gov>; lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov; FifthDistrict@lacbos.org

Subject: Attn: Mira Loma Women's Jail Environmental Impact Report

Dear LA County Chief Exec Office and Board of Supervisors,

[Insert brief introductory message why you oppose jail]

Please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

A new jail in Lancaster County will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the County of Los Angeles, in extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

--

Luis Reyes
Luisrb7@hotmail.com

Original Message-----

From: Jareli Reynoso [mailto:Hareli1992@yahoo.com]

Sent: Wednesday, January 06, 2016 7:48 PM

To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental <environmental@ceo.lacounty.gov>; lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov; FifthDistrict@lacbos.org

Subject: Attn: Mira Loma Women's Jail Environmental Impact Report

Dear LA County Chief Exec Office and Board of Supervisors,

[Insert brief introductory message why you oppose jail]

Please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

A new jail in Lancaster County will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the County of Los Angeles, in extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

--

Jareli Reynoso

Hareli1992@yahoo.com

-----Original Message-----

From: Natalie Rosen [mailto:nerosen@gmail.com]

Sent: Thursday, January 07, 2016 2:19 PM

To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental <environmental@ceo.lacounty.gov>; lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov; FifthDistrict@lacbos.org

Subject: Attn: Mira Loma Women's Jail Environmental Impact Report

Dear LA County Chief Exec Office and Board of Supervisors,

[Insert brief introductory message why you oppose jail]

Please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

A new LA county jail in Lancaster will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the County of Los Angeles, in extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

--

Natalie Rosen

nerosen@gmail.com

5021 Sanlo Pl

Woodland Hills, California 91364

-----Original Message-----

From: Peter Joseph Rosenwald [mailto:sunkistpete@yahoo.com]

Sent: Tuesday, January 12, 2016 9:37 PM

To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental <environmental@ceo.lacounty.gov>; lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov; FifthDistrict@lacbos.org

Subject: Attn: Mira Loma Women's Jail Environmental Impact Report

Dear LA County Chief Exec Office and Board of Supervisors,

[Insert brief introductory message why you oppose jail]

Please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

A new LA county jail in Lancaster will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the County of Los Angeles, in extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

--

Peter Joseph Rosenwald
sunkistpete@yahoo.com

P.O. Box 3978

Seal Beach, California 90740

South Coast Interfaith Council, Justice & Peace Committee; Gray

-----Original Message-----

From: Kenia Rubi [mailto:Keni_15.2009@yahoo.com]

Sent: Friday, January 08, 2016 11:53 AM

To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental <environmental@ceo.lacounty.gov>; lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov; FifthDistrict@lacbos.org

Subject: Attn: Mira Loma Women's Jail Environmental Impact Report

Dear LA County Chief Exec Office and Board of Supervisors,

[Insert brief introductory message why you oppose jail]

Please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

A new LA county jail in Lancaster will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the County of Los Angeles, in extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

Kenia Rubi

Keni_15.2009@yahoo.com

27350 Tyrrell Ave
Hayward, CA 94544

-----Original Message-----

From: Nicholas Rulli [mailto:ohioboyla@aol.com]

Sent: Wednesday, January 06, 2016 9:42 PM

To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental <environmental@ceo.lacounty.gov>; lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov; FifthDistrict@lacbos.org

Subject: Attn: Mira Loma Women's Jail Environmental Impact Report

Dear LA County Chief Exec Office and Board of Supervisors,

[Insert brief introductory message why you oppose jail]

Please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

A new jail in Lancaster County will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the County of Los Angeles, in extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

--

Nicholas Rulli
ohioboyla@aol.com
1353 W. Temple St.
Los Angeles, California 90026

-----Original Message-----

From: Samyrha Saba [mailto:saboobbaloo@gmail.com]

Sent: Tuesday, January 12, 2016 11:41 AM

To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental <environmental@ceo.lacounty.gov>; lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov; FifthDistrict@lacbos.org

Subject: Attn: Mira Loma Women's Jail Environmental Impact Report

Dear LA County Chief Exec Office and Board of Supervisors,

[Insert brief introductory message why you oppose jail]

Please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

A new LA county jail in Lancaster will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the County of Los Angeles, in extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

--

Samyrha Saba
saboobbaloo@gmail.com
4437 Radium dr.
Los Angeles , CA 90032
NA

-----Original Message-----

From: Jennifer Samples [mailto:jennsamps1@gmail.com]

Sent: Monday, January 11, 2016 11:38 AM

To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental <environmental@ceo.lacounty.gov>; lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov; FifthDistrict@lacbos.org

Subject: Attn: Mira Loma Women's Jail Environmental Impact Report

Dear LA County Chief Exec Office and Board of Supervisors,

Please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

A new LA county jail in Lancaster will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the County of Los Angeles, in extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

--

Jennifer Samples
jennsamps1@gmail.com
3650 Regal Place, #38

Los Angeles, CA 90068
CURB

Original Message-----

From: sergio sanchez [mailto:sfsanchez1@msn.com]

Sent: Monday, February 29, 2016 2:41 PM

To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental <environmental@ceo.lacounty.gov>; lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov; FifthDistrict@lacbos.org

Subject: Attn: Mira Loma Women's Jail Environmental Impact Report

Dear LA County Chief Exec Office and Board of Supervisors,

[Insert brief introductory message why you oppose jail]

Please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

A new LA county jail in Lancaster will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the County of Los Angeles, in extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

--

sergio sanchez
sfsanchez1@msn.com
305 avenida esplendor
walnut, CA 91789
Mr.

-----Original Message-----

From: Steven Standard [mailto:swstandard@yahoo.com]

Sent: Wednesday, January 06, 2016 10:24 PM

To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental <environmental@ceo.lacounty.gov>; lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov; FifthDistrict@lacbos.org

Subject: Attn: Mira Loma Women's Jail Environmental Impact Report

Dear LA County Chief Exec Office and Board of Supervisors,

[Insert brief introductory message why you oppose jail]

Please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

A new jail in Lancaster County will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the County of Los Angeles, in extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

--

Steven Standard
swstandard@yahoo.com
920 S. Soto St.
Los Angeles 90023

-----Original Message-----

From: Gabriela Tellez [mailto:Tellezg_24@yahoo.com]

Sent: Tuesday, January 12, 2016 11:59 AM

To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental <environmental@ceo.lacounty.gov>; lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov; FifthDistrict@lacbos.org

Subject: Attn: Mira Loma Women's Jail Environmental Impact Report

Dear LA County Chief Exec Office and Board of Supervisors,

[Insert brief introductory message why you oppose jail]

Please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

A new LA county jail in Lancaster will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the County of Los Angeles, in extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

--

Gabriela Tellez
Tellezg_24@yahoo.com
3501 atlantic st
Los Angeles , 90023 90023

-----Original Message-----

From: nigisti tesfai [mailto:naahama.shalom@gmail.com]

Sent: Friday, February 05, 2016 6:51 PM

To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental <environmental@ceo.lacounty.gov>; lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov; FifthDistrict@lacbos.org

Subject: Attn: Mira Loma Women's Jail Environmental Impact Report

Dear LA County Chief Exec Office and Board of Supervisors,

[Insert brief introductory message why you oppose jail]

Please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

A new LA county jail in Lancaster will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the County of Los Angeles, in extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

--

nigisti tesfai
naahama.shalom@gmail.com
3540 Wilshire Blvd
los angeles , California 90010
African Community Resource Center

-----Original Message-----

From: Mary Trujillo [mailto:shakinghandswithgod@gmail.com]

Sent: Wednesday, January 06, 2016 1:07 PM

To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental <environmental@ceo.lacounty.gov>; lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov; FifthDistrict@lacbos.org

Subject: Attn: Mira Loma Women's Jail Environmental Impact Report

Dear LA County Chief Exec Office and Board of Supervisors,

[Insert brief introductory message why you oppose jail]

Please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

A new jail in Lancaster County will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the County of Los Angeles, in extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

--

Mary Trujillo
shakinghandswithgod@gmail.com
626 S Live Oak Drive
Anaheim, CA 92805

From: Christina Tsao [mailto:christina@criticalresistance.org]
Sent: Tuesday, January 12, 2016 8:01 AM
To: CEO Environmental <environmental@ceo.lacounty.gov>
Subject: Attn: Mira Loma Women's Detention Center EIR

To whom it may concern:

Attached is our letter to be submitted as public comment on the Draft EIR of the proposed women's jail.

Please confirm your receipt.

--

[Critical Resistance Los Angeles](http://CriticalResistanceLosAngeles.org)
1137 E. Redondo Blvd.
Inglewood, CA 90302
christina@criticalresistance.org
(626) 215-4818

-----Original Message-----

From: Christina Tsao [mailto:christsao2@gmail.com]

Sent: Wednesday, January 06, 2016 1:33 PM

To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental <environmental@ceo.lacounty.gov>; lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov; FifthDistrict@lacbos.org

Subject: Attn: Mira Loma Women's Jail Environmental Impact Report

Dear LA County Chief Exec Office and Board of Supervisors,

Please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

A new jail in Lancaster County will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the County of Los Angeles, in extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

--

A -Christina Tsao
christsao2@gmail.com

407 E. Duarte Rd.
Arcadia, CALIFORNIA 91006

-----Original Message-----

From: daisy tsao [mailto:daisyweeds@yahoo.com]

Sent: Wednesday, January 06, 2016 6:16 PM

To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental <environmental@ceo.lacounty.gov>; lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov; FifthDistrict@lacbos.org

Subject: Attn: Mira Loma Women's Jail Environmental Impact Report

Dear LA County Chief Exec Office and Board of Supervisors,

Please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

A new jail in Lancaster County will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the County of Los Angeles, in extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

--

daisy tsao

daisyweeds@yahoo.com

-----Original Message-----

From: Joyce Tsao [mailto:Joy8ce8838@yahoo.com]

Sent: Sunday, January 10, 2016 1:14 AM

To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental <environmental@ceo.lacounty.gov>; lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov; FifthDistrict@lacbos.org

Subject: Attn: Mira Loma Women's Jail Environmental Impact Report

Dear LA County Chief Exec Office and Board of Supervisors,

[Insert brief introductory message why you oppose jail]

Please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

A new LA county jail in Lancaster will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the County of Los Angeles, in extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

--

Joyce Tsao
Joy8ce8838@yahoo.com
407 e Duarte rd
Arcadia, Ca 91006

-----Original Message-----

From: Diandra Tula [mailto:tulaidandra@yahoo.com]

Sent: Wednesday, January 06, 2016 12:43 PM

To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental <environmental@ceo.lacounty.gov>; lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov; FifthDistrict@lacbos.org

Subject: Attn: Mira Loma Women's Jail Environmental Impact Report

Dear LA County Chief Exec Office and Board of Supervisors,

Please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

A new jail in Lancaster County will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the County of Los Angeles, in extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

--

Diandra Tula
tulaidandra@yahoo.com
425 willow ave

la Puente, California 91746

-----Original Message-----

From: Diandra Tula [mailto:tuladiandra@yahoo.com]

Sent: Monday, February 29, 2016 1:02 PM

To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental <environmental@ceo.lacounty.gov>; lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov; FifthDistrict@lacbos.org

Subject: Attn: Mira Loma Women's Jail Environmental Impact Report

Dear LA County Chief Exec Office and Board of Supervisors,

[Insert brief introductory message why you oppose jail]

Please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

A new LA county jail in Lancaster will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the County of Los Angeles, in extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

--

Diandra Tula
tuladiandra@yahoo.com
425 Willow Avenue
La Puente, California 91746

Original Message-----

From: Stephanie Valerio [mailto:stephanievalerio98@gmail.com]

Sent: Tuesday, March 01, 2016 9:09 PM

To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental <environmental@ceo.lacounty.gov>; lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov; FifthDistrict@lacbos.org

Subject: Attn: Mira Loma Women's Jail Environmental Impact Report

Dear LA County Chief Exec Office and Board of Supervisors,

[Insert brief introductory message why you oppose jail]

Please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

A new LA county jail in Lancaster will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the County of Los Angeles, in extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

--

Stephanie Valerio
stephanievalerio98@gmail.com

-----Original Message-----

From: Dona van Bloemen van Bloemen [mailto:agataterra@yahoo.com]

Sent: Monday, February 29, 2016 11:48 PM

To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental <environmental@ceo.lacounty.gov>; lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov; FifthDistrict@lacbos.org

Subject: Attn: Mira Loma Women's Jail Environmental Impact Report

Dear LA County Chief Exec Office and Board of Supervisors,

Please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

A new LA county jail in Lancaster will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the County of Los Angeles, in extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

--

Dona van Bloemen van Bloemen
agataterra@yahoo.com
1117 3rd. Street

Santa Monica, CA California 90403

-----Original Message-----

From: Angela Vargas [mailto:Angelavar14@gmail.com]

Sent: Wednesday, January 06, 2016 10:18 PM

To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental <environmental@ceo.lacounty.gov>; lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov; FifthDistrict@lacbos.org

Subject: Attn: Mira Loma Women's Jail Environmental Impact Report

Dear LA County Chief Exec Office and Board of Supervisors,

[Insert brief introductory message why you oppose jail]

Please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

A new jail in Lancaster County will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the County of Los Angeles, in extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

--

Angela Vargas
Angelavar14@gmail.com

-----Original Message-----

From: M Vg [mailto:Hella.lolz@gmail.com]

Sent: Thursday, January 07, 2016 10:12 AM

To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental <environmental@ceo.lacounty.gov>; lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov; FifthDistrict@lacbos.org

Subject: Attn: Mira Loma Women's Jail Environmental Impact Report

Dear LA County Chief Exec Office and Board of Supervisors,

[Insert brief introductory message why you oppose jail]

Please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

A new jail in Lancaster County will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the County of Los Angeles, in extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

--

M Vg

Hella.lolz@gmail.com

-----Original Message-----

From: Jenna Victoria [mailto:Jennasalvador@gmail.com]

Sent: Tuesday, March 01, 2016 9:00 PM

To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental <environmental@ceo.lacounty.gov>; lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov; FifthDistrict@lacbos.org

Subject: Attn: Mira Loma Women's Jail Environmental Impact Report

Dear LA County Chief Exec Office and Board of Supervisors,

[Insert brief introductory message why you oppose jail]

Please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

A new LA county jail in Lancaster will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the County of Los Angeles, in extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

--

Jenna Victoria
Jennasalvador@gmail.com
Villa Valencia
San Antonio , Texas 78258

-----Original Message-----

From: Jas Wade [mailto:jasminewade86@gmail.com]

Sent: Wednesday, January 06, 2016 2:17 PM

To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental <environmental@ceo.lacounty.gov>; lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov; FifthDistrict@lacbos.org

Subject: Attn: Mira Loma Women's Jail Environmental Impact Report

Dear LA County Chief Exec Office and Board of Supervisors,

[Insert brief introductory message why you oppose jail]

Please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

A new jail in Lancaster County will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the County of Los Angeles, in extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

--

Jas Wade

jasminewade86@gmail.com

Los Angeles, California 90062

-----Original Message-----

From: Michelle Wang [mailto:mwang227@gmail.com]

Sent: Saturday, January 09, 2016 6:04 PM

To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental <environmental@ceo.lacounty.gov>; lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov; FifthDistrict@lacbos.org

Subject: Attn: Mira Loma Women's Jail Environmental Impact Report

Dear LA County Chief Exec Office and Board of Supervisors,

[Insert brief introductory message why you oppose jail]

Please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

A new LA county jail in Lancaster will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the County of Los Angeles, in extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

--

Michelle Wang
mswang227@gmail.com

-----Original Message-----

From: Audrey Whitaker [mailto:Elisewhitakeroccupyla@gmail.com]

Sent: Thursday, January 07, 2016 8:22 AM

To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental <environmental@ceo.lacounty.gov>; lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov; FifthDistrict@lacbos.org

Subject: Attn: Mira Loma Women's Jail Environmental Impact Report

Dear LA County Chief Exec Office and Board of Supervisors,

[Insert brief introductory message why you oppose jail]

Please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

A new jail in Lancaster County will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the County of Los Angeles, in extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

--

Audrey Whitaker

Elisewhitakeroccupyla@gmail.com

-----Original Message-----

From: Robin Wilson [mailto:ms23robin@yahoo.com]

Sent: Monday, February 29, 2016 5:00 PM

To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental <environmental@ceo.lacounty.gov>; lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov; FifthDistrict@lacbos.org

Subject: Attn: Mira Loma Women's Jail Environmental Impact Report

Dear LA County Chief Exec Office and Board of Supervisors,

[Insert brief introductory message why you oppose jail]

Please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

A new LA county jail in Lancaster will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the County of Los Angeles, in extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

--

Robin Wilson
ms23robin@yahoo.com
5727 S. Corning Ave.
Los Angeles, California 90056
CURB

-----Original Message-----

From: Jim Yarbrough [mailto:jyarbro2003@yahoo.com]

Sent: Wednesday, January 06, 2016 3:02 PM

To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental <environmental@ceo.lacounty.gov>; lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov; FifthDistrict@lacbos.org

Subject: Attn: Mira Loma Women's Jail Environmental Impact Report

Dear LA County Chief Exec Office and Board of Supervisors,

Please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

A new jail in Lancaster County will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the County of Los Angeles, in extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

--

Jim Yarbrough
jyarbro2003@yahoo.com
South Pasadena, CA

-----Original Message-----

From: franchezska zamora [mailto:claygirl69@hotmail.com]

Sent: Saturday, January 09, 2016 7:40 PM

To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental <environmental@ceo.lacounty.gov>; lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov; FifthDistrict@lacbos.org

Subject: Attn: Mira Loma Women's Jail Environmental Impact Report

Dear LA County Chief Exec Office and Board of Supervisors,

[Insert brief introductory message why you oppose jail]

Please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

A new LA county jail in Lancaster will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the County of Los Angeles, in extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

--

franchezka zamora
claygirl69@hotmail.com
403 n. catalina ave

Original Message-----

From: LiHao Zhang [mailto:lihaoza@gmail.com]

Sent: Wednesday, January 06, 2016 5:44 PM

To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental <environmental@ceo.lacounty.gov>; lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov; FifthDistrict@lacbos.org

Subject: Attn: Mira Loma Women's Jail Environmental Impact Report

Dear LA County Chief Exec Office and Board of Supervisors,

[Insert brief introductory message why you oppose jail]

Please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

A new jail in Lancaster County will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the County of Los Angeles, in extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

--

LiHao Zhang

lihaoza@gmail.com

1387 N Summit Ave

Pasadena, California 91103

From: Nigisti [mailto:donotreply@wordpress.com]

Sent: Monday, February 29, 2016 12:48 PM

To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental <environmental@ceo.lacounty.gov>; lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov; FifthDistrict@lacbos.org

Subject: Attn: Mira Loma Women's Jail, Environmental Impact Report

Name: Nigisti

Email: naahama.shalom@gmail.com

Address: 3540 wilshire blvd

City: Los Angeles

State: California

Zip Code: 90010

Comment (please personalize): Dear LA County Chief Exec Office and Board of Supervisors,

~ Insert brief introductory message why you oppose jail ~

Please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

A new LA county jail in Lancaster will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the

County of Los Angeles, in extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

Time: February 29, 2016 at 8:47 pm

IP Address: 100.35.2.200

Contact Form URL: <http://lanomorejails.org/2016/01/05/urgent-submit-comment-now-against-proposed-new-la-county-jail/>

Sent by an unverified visitor to your site.

From: Thelma [<mailto:donotreply@wordpress.com>]

Sent: Saturday, March 12, 2016 9:32 PM

To: info@lanomorejails.org; executiveoffice@bos.lacounty.gov; CEO Environmental <environmental@ceo.lacounty.gov>; lily@criticalresistance.org; FirstDistrict@bos.lacounty.gov; MarkRidley-Thomas@bos.lacounty.gov; Sheila@bos.lacounty.gov; Don@bos.lacounty.gov; FifthDistrict@lacbos.org

Subject: Attn: Mira Loma Women's Jail, Environmental Impact Report

Name: Thelma

Email: chanze@ca.rr.com

Address: 8805 Berkshire Way Unit A

City: Inglewood

State: California

Zip Code: 90305

Comment (please personalize): Dear LA County Chief Exec Office and Board of Supervisors,

~ Insert brief introductory message why you oppose jail ~

Please consider my public comment on the Draft Environmental Impact Report (EIR) regarding the proposed new Mira Loma Jail released on November 9th.

A new LA county jail in Lancaster will be severely detrimental to the health and well being of LA County residents as well as destructive to the local environment. The EIR fails to adequately address the negative impacts on residents and the natural landscape caused by jail construction, nor does it adequately provide plans for community based alternatives to jail construction. With investment in diversion, bail/bond reform, and other jail population reduction measures, this proposed jail would be unnecessary.

The proposed jail site is located several hours from downtown Los Angeles, requiring additional travel for people imprisoned there, lawyers and service providers serving prisoners, and their loved ones who wish to visit. This increased travel will be a severe burden on families, providers, and prisoners that must be considered in the proposal as community connections through programs and family visits have been shown to greatly reduce recidivism. Additionally, increased travel will cause greater smog and air pollution, as well as place a strain on already inadequate public transportation and road systems used by prisoners, loved ones, jail staff, and construction workers.

The suggested location is a known "hazardous waste site", with two underground storage tanks that have failed leak detection tests, meaning there could be contamination of soil and groundwater, and a high risk of exposure to contaminated soil and ground since 44% of the project site will be "outdoor pervious area". This puts prisoners at the jail, in custody of the

County of Los Angeles, in extreme health risk. Plans for water usage and storage when proposing to introduce thousands of new prisoners as well as hundreds of employees are inadequate at mitigating the strain to the environment and current residents. Additionally the weather and environmental conditions in this area foster a high probability for "Valley Fever", a fungal disease that can result in death. If the jail proposal moves forward, during construction local residents would be at increased risk due to displacement of dry soils. After completion, prisoners at the jail would be at great risk for this disease, particularly those with already compromised immune systems.

This proposed jail is unsafe for LA County communities and our environment. For the above reasons, the proposed new Mira Loma Jail should be rejected and the Draft EIR must not be approved.

Time: March 13, 2016 at 5:31 am

IP Address: 108.208.110.113

Contact Form URL: <http://lanomorejails.org/2016/01/05/urgent-submit-comment-now-against-proposed-new-la-county-jail/>

Sent by an unverified visitor to your site.

Appendix B

Cultural Resources Records Search

Natural History Museum
of Los Angeles County
900 Exposition Boulevard
Los Angeles, CA 90007

tel 213.763.DINO
www.nhm.org



Vertebrate Paleontology Section
Telephone: (213) 763-3325
Fax: (213) 746-7431
e-mail: smcleod@nhm.org

18 February 2016

BonTerra Psomas
3 Hutton Centre Drive, Suite 200
Santa Ana, CA 92707-8794

Attn: Patrick O. Maxon, Director, Cultural Resources

re: Paleontological Resources for the proposed Mira Loma Detention Facility Project, near
Lancaster, Los Angeles County, project area

Dear Patrick:

I have conducted a thorough search of our Vertebrate Paleontology records for the proposed Mira Loma Detention Facility Project, near Lancaster, Los Angeles County, project area as outlined on the portion of the Lancaster West USGS topographic quadrangle map that you sent to me via e-mail on 16 February 2016. We do not have any vertebrate fossil localities that lie directly within the proposed project area boundaries, but we do have fossil vertebrate localities nearby from the same sedimentary deposits that occur in the proposed project area.

Surface deposits in the entire proposed project area are composed of younger Quaternary Alluvium beneath soil, derived broadly as alluvial fan deposits from the Antelope Buttes hills to the west and the Portal Ridge hills to the south. Although these types of sedimentary deposits frequently do not contain significant vertebrate fossils, at least in the uppermost layers, our closest vertebrate fossil locality from these deposits is LACM 7884, barely north of due east of the proposed project area on the northern side of Lancaster near Avenue I, that produced a fossil specimen of camel, *Camelops hesternus*, from four feet below the surface. Our next closest fossil vertebrate locality from these deposits is LACM 7853, east-northeast of the proposed project area and east of north of locality LACM 7884 near Avenue F, that from screened matrix collected at a three foot depth produced a suite of fossil vertebrates including smelts, Osmeridae, whipsnake, *Masticophis*, leaf-nosed snake, *Phyllorhynchus*, lyre snake, *Trimorphodon*

biscutatus, desert iguana, *Dipsosaurus dorsalis*, alligator lizard, *Elgaria*, desert spiny lizard, *Sceloporus magister*, side-blotched lizard, *Uta stansburiana*, horned lizard, Phrynosomatidae, skink, *Plestiodon*, western whiptail, *Aspidoscelis tigris*, desert night lizard, *Xantusia vigilis*, rabbit, *Sylvilagus audubonii*, wood rat, *Neotoma*, deer mouse, *Peromyscus*, pocket gopher, *Thomomys bottae*, kangaroo rat, *Dipodomys*, pocket mouse, *Perognathus*, ground squirrel, *Ammospermophilus leucurus*, and camel, *Camelops*.

Surface grading or very shallow excavations in the exposures of younger Quaternary Alluvium in the proposed project area are unlikely to encounter significant vertebrate fossils. Deeper excavations in the latter areas that extend down into older deposits, however, may well uncover significant fossil vertebrate remains. Any substantial excavations in the proposed project area below the uppermost layers, therefore, should be monitored closely to quickly and professionally recover any fossil remains discovered while not impeding development. Also, sediment samples should be collected and processed to determine the small fossil potential in the proposed project area. Any fossils recovered during mitigation should be deposited in an accredited and permanent scientific institution for the benefit of current and future generations.

This records search covers only the vertebrate paleontology records of the Natural History Museum of Los Angeles County. It is not intended to be a thorough paleontological survey of the proposed project area covering other institutional records, a literature survey, or any potential on-site survey.

Sincerely,

A handwritten signature in cursive script that reads "Samuel A. McLeod".

Samuel A. McLeod, Ph.D.
Vertebrate Paleontology

enclosure: invoice

Appendix C

**San Manuel Band of Mission Indians
Response to the Project**

From: Daniel McCarthy [<mailto:DMcCarthy@sanmanuel-nsn.gov>]
Sent: Thursday, February 06, 2014 2:20 PM
To: Patrick Maxon <PMaxon@bonterraconsulting.com>
Subject: Re: Mira Loma Detention Facility Project

Patrick,

Thank you for the opportunity to comment. We appreciate the information you provided, including the records search results. Given the nature and location of the project, we have no concerns. //daniel

Daniel McCarthy, MS, RPA
Director
Cultural Resources Management Department
San Manuel Band of Mission Indians
26569 Community Center Drive
Highland, CA 92346
Office: 909 864-8933 x 3248
Cell: 909 838-4175
dmccarthy@sanmanuel-nsn.gov

THIS MESSAGE IS INTENDED ONLY FOR THE USE OF THE INDIVIDUAL OR ENTITY TO WHICH IT IS ADDRESSED AND MAY CONTAIN INFORMATION THAT IS PRIVILEGED, CONFIDENTIAL AND EXEMPT FROM DISCLOSURE UNDER APPLICABLE LAW. If the reader of this message is not the intended recipient or agent responsible for delivering the message to the intended recipient, you are hereby notified that any dissemination or copying of this communication is strictly prohibited. If you have received this electronic transmission in error, please delete it from your system without copying it and notify the sender by reply e-mail so that the email address record can be corrected. Thank You

Appendix D

**Limited Asbestos and
Lead-Based Paint Sampling Report -
Buildings 27, 28, 29, 32 and 40**



Converse Consultants

Geotechnical Engineering, Environmental & Groundwater Science, Inspection & Testing Services

March 21, 2016

Ms. Alicia Ramos
Project Manager
County of Los Angeles, Department of Public Works
900 South Fremont Avenue
5th Floor
Alhambra, California 91803

Subject: **Limited Asbestos and Lead-Base Paint Sampling Report
Buildings 27, 28, 29, 32 and 40**
Mira Loma Detention Facility
45100 60th Street West
Lancaster, California
Converse Project No. 12-41-290-09

Ms. Ramos:

On March 11, 2016, Converse Consultants (Converse) completed a Limited Asbestos and Lead-Base Paint (LPB) Survey at the referenced buildings at the Mira Loma Detention Facility. Converse's work was completed in general accordance with our proposal dated March 8, 2016.

The work was completed by certified asbestos or lead staff of Converse. Copies of their certifications are attached to this letter. Copies of the laboratory certifications are also attached.

A summary of the findings is provided below. Attached to this letter are copies of the analytical reports, chain of custodies, sample location maps and the XRF field logs.

Asbestos

The bulk materials were submitted to a State-certified laboratory, LA Testing in Sierra Madre, California for analysis. The bulk samples were analyzed by Polarized Light Microscopy (PLM) in accordance with EPA Test Method 600/R-93/116.

Building 27

Samples were collected of the following materials:

- Carpet Mastic
- 12x12 Vinyl Floor tile (VFT) (white speckled) and mastic (yellow)
- Yellow Mastic to Rubber Floor Mat
- Brown Mastic to Rubber Floor Mat
- Drywall/joint Compound
- 2x4 Ceiling Tiles (fissured)
- Roof Core

Asbestos was not detected in any of the sampled materials.

Building 28

Samples were collected of the following materials:

- 2x4 Ceiling Tiles (fissured with holes)
- Drywall/Joint Compound
- Carpet Mastic
- Exterior Stucco Coat
- Roof Core

Asbestos (2 percent) was detected in the roof core material. There is approximately 1,700 square feet of material in good condition.

Asbestos was not detected in the remaining sampled materials.

Building 29

Samples were collected of the following materials:

- 2x4 Ceiling Tiles (fissured with holes)
- 12x12 Vinyl Floor Tile (yellow) and mastic (yellow)
- Baseboard Mastic, Brown
- Wallboard Material, Brown
- Wallboard Material, White
- Carpet Mastic
- Roof Core
- Roof Penetration Mastic

Asbestos was detected in the following materials:

- 12x12 yellow VFT contains 2% asbestos. There is approximately 90 square feet of material in good condition. The VFT is located in restroom and shower. Asbestos was not detected in the mastic.
- Roof core contains 5% asbestos. There is approximately 1,500 square feet of material in good condition.

- Roof penetration mastic contains 5% asbestos. There is approximately 5 square feet of material in good condition.

Asbestos was not detected in the remaining sampled materials.

Building 32

Samples were collected of the following materials:

- 2x4 Ceiling Tiles (Fissured with Holes)
- Sheet Flooring (blue) and mastic (yellow)
- Drywall/Joint Compound
- Carpet Mastic
- Roof Seam Roll

Asbestos was not detected in any of the sampled materials.

Building 40

Samples were collected of the following materials:

- 2x4 Ceiling Tiles
- Sheet Flooring (brown) and Mastic (brown)
- Roof Penetration Mastic

Asbestos (5 percent) was detected in the roof penetration mastic. There is approximately 10 square feet of material in good condition. The roof core consisted of foam (non-suspect material).

Asbestos was not detected in the remaining sampled materials.

If the buildings are to be demolished on-site, the asbestos materials will need to be abated prior to demolition. Asbestos abatement must be performed by a Cal/DOSH licensed asbestos abatement contractor using methods in accordance with 8 CCR 1529, and SCAQMD Rule 1403.

If the buildings are removed from the site, without being demolished, the asbestos materials do not need to be abated.

Lead-Base Paint (LBP)

Both interior and exterior building components were surveyed utilizing a XRF device to measure lead content in painted surfaces. The detection level for lead was set at 0.7 milligrams per square centimeter (mg/cm²) as defined by the Los Angeles County Department of Health Services (DHS). Components surveyed included:

- Walls and associated components
- Doors and associated components
- Windows and associated components
- Room Dividers
- Benches
- Desk/Table Frames



- Entry Stairs, Rails, Posts
- Floors
- Roof Eaves
- Porcelain Toilets
- Porcelain Sinks
- Entry ramps, posts, rails
- Pipes
- Utility boxes
- Trailer hitches

Only two sinks were found to contain lead greater than 0.7 mg/cm². Both sinks are located in Building 29. The sink located in the restroom and in the shower room had lead concentrations of 37.9 and 27.8 mg/cm² respectively. Both sinks were in good condition. If Building 29 is to be demolished, the sinks should be removed prior to the demolition. If the sinks are removed intact, the items can be disposed of construction debris.

The remaining interior and exterior components all had lead concentrations less than 0.7 mg/cm².

Closure

This letter report is for the sole benefit and exclusive use of the County of Los Angeles, Department of Public Works as it pertains to the Mira Loma Detention Facility located at 45100 60th Street West in the City of Lancaster, California. Our services have been performed in accordance with the terms and conditions under which these services have been provided. Its preparation has been in accordance with generally accepted environmental practices. No other warranty, either express or implied, is made. The Scope of Services associated with the report was designed solely in accordance with the objectives, schedule, budget, and risk-management preferences of the County of Los Angeles, Department of Public Works.

This report should not be regarded as a guarantee that further ACMs or LBPs, beyond that which could be detected within the scope of this project, is present at the Property. It is not possible to absolutely confirm that no hazardous materials and/or substances exist at the Property. If none are identified as part of a limited scope of work, such a conclusion should not be construed as a guaranteed absence of such materials, but merely the results of the evaluation of the property at the time of the survey. Also, events may occur after the Property visit, which may result in contamination of the Property. Additional information, which was not found or available to Converse at the time of report preparation, may result in a modification of the conclusions and recommendations presented.

Any reliance on this report by Third Parties shall be at the Third Party's sole risk. Should DPW wish to identify any additional relying parties not previously identified, a completed *Application of Authorization to Use* (see page 6 of this report) must be submitted to Converse Consultants.



We appreciate the opportunity to be of service. Should you have any questions or comments regarding this report, please contact either Laura Tanaka at (626) 930-1261 or Norman Eke at (626) 930-1260.

Sincerely,

CONVERSE CONSULTANTS



Laura Tanaka
Certified Asbestos Consultant, #11-4708
DPH Lead Inspector/Assessor #I-3086
Principal Environmental Scientist



Norman Eke
Certified Asbestos Consultant, #96-2093
Managing Officer

Attch: Application for Authorization to Use
Certifications
Asbestos: Analytical Reports, Chain of Custodies, Sample Location Maps
Lead: XRF Logs





Converse Consultants

Geotechnical Engineering, Environmental & Groundwater Science, Inspection & Testing Services

Application for Authorization to Use

TO: Converse Consultants
222 East Huntington Drive, Suite 211
Monrovia, California 91016

Project Title & Date: _____

Project Address: _____

FROM: (Please identify name & address of person/entity applying for permission to use the referenced report.)

Applicant _____ hereby applies for permission to use the referenced report in order to:

Applicant wishes or needs to use the referenced report because:

Applicant also understands and agrees that the referenced document is a copyrighted document and shall remain the sole property of Converse Consultants. Unauthorized use or copying of the report is strictly prohibited without the express written permission of Converse Consultants. *Applicant* understands and agrees that Converse Consultants may withhold such permission at its sole discretion, or grant such permission upon agreement to Terms and Conditions, such as the payment of a re-use fee, amongst others.

Applicant Signature: _____

Applicant Name (print): _____

Title: _____

Date: _____



Certifications

Certifications



State of California
Division of Occupational Safety and Health
Certified Asbestos Consultant



Laura L. Cattaneo

Name

Certification No. **92-0492**

Expires on **08/13/16**

This certification was issued by the Division of Occupational Safety and Health as authorized by Sections 7180 et seq. of the Business and Professions Code.



State of California
Division of Occupational Safety and Health
Certified Asbestos Consultant

Norman S Eke

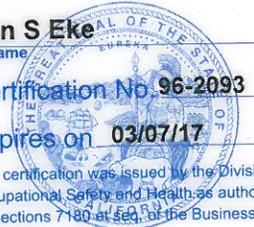
Name



Certification No. **96-2093**

Expires on **03/07/17**

This certification was issued by the Division of Occupational Safety and Health as authorized by Sections 7180 et seq. of the Business and Professions Code.



State of California
Division of Occupational Safety and Health
Certified Asbestos Consultant

J Andres Romero



Name

Certification No. **09-4491**

Expires on **05/21/16**

This certification was issued by the Division of Occupational Safety and Health as authorized by Sections 7180 et seq. of the Business and Professions Code

State of California Department of Public Health

Lead-Related
Construction
Certificate

Certificate
Type

Expiration
Date

Project Monitor 01/23/2016

Sampling Technician 01/23/2017



J. Andres Romero

ID #: **15505**

State of California
 Division of Occupational Safety and Health
Certified Asbestos Consultant



Laura A Tanaka
Name

Certification No. 11-4708

Expires on 01/19/17

This certification was issued by the Division of Occupational Safety and Health as authorized by Sections 7180 et seq. of the Business and Professions Code.

State of California Department of Public Health

Lead-Related
 Construction
 Certificate

Certificate
Type

Expiration
Date

Inspector/Assessor	04/27/2017
Project Designer	04/27/2017
Project Monitor	04/27/2017



Laura A. Tanaka

ID #: 3086



AIHA Laboratory Accreditation Programs, LLC

acknowledges that

LA Testing – Sierra Madre, California

82 West Sierra Madre Boulevard, Sierra Madre, CA 91024-2434

Laboratory ID: 101658

along with all premises from which key activities are performed, as listed above, has fulfilled the requirements of the AIHA Laboratory Accreditation Programs (AIHA-LAP), LLC accreditation to the ISO/IEC 17025:2005 international standard, *General Requirements for the Competence of Testing and Calibration Laboratories* in the following:

LABORATORY ACCREDITATION PROGRAMS

- INDUSTRIAL HYGIENE**
- ENVIRONMENTAL LEAD**
- ENVIRONMENTAL MICROBIOLOGY**
- FOOD**
- UNIQUE SCOPES**

Accreditation Expires: 06/01/2017

Accreditation Expires:

Accreditation Expires:

Accreditation Expires:

Accreditation Expires:

Specific Field(s) of Testing (FoT)/Method(s) within each Accreditation Program for which the above named laboratory maintains accreditation is outlined on the attached **Scope of Accreditation**. Continued accreditation is contingent upon successful on-going compliance with ISO/IEC 17025:2005 and AIHA-LAP, LLC requirements. This certificate is not valid without the attached **Scope of Accreditation**. Please review the AIHA-LAP, LLC website (www.aihaaccreditedlabs.org) for the most current Scope.

Gerald Schultz, CIH
Chairperson, Analytical Accreditation Board

Cheryl O. Morton
Managing Director, AIHA Laboratory Accreditation Programs, LLC

Revision 14: 03/26/2014

Date Issued: 11/10/2015



AIHA Laboratory Accreditation Programs, LLC SCOPE OF ACCREDITATION

LA Testing – Sierra Madre, California
82 West Sierra Madre Boulevard, Sierra Madre, CA 91024-2434

Laboratory ID: **101658**
Issue Date: 11/10/2015

The laboratory is approved for those specific field(s) of testing/methods listed in the table below. Clients are urged to verify the laboratory's current accreditation status for the particular field(s) of testing/Methods, since these can change due to proficiency status, suspension and/or withdrawal of accreditation.

Industrial Hygiene Laboratory Accreditation Program (IHLAP)

Initial Accreditation Date: 02/01/1992

IHLAP Scope Category	Field of Testing (FoT) (FoTs cover all relevant IH matrices)	Technology sub-type/ Detector	Published Reference Method/Title of In-house Method	Method Description or Analyte <i>(for internal methods only)</i>
Asbestos/Fiber Microscopy Core	Polarized Light Microscopy (PLM)		EPA 600/R-93/116	
	Phase Contrast Microscopy (PCM)		NIOSH 7400	
	Transmission Electron Microscopy (TEM)		NIOSH 7402	
Miscellaneous Core	Gravimetric		NIOSH 0500	
			NIOSH 0600	

A complete listing of currently accredited Industrial Hygiene laboratories is available on the AIHA-LAP, LLC website at: <http://www.aihaaccreditedlabs.org>

State Water Resources Control Board

Division of Drinking Water

September 15, 2015

Bonnie Soles, Quality Assurance Administrator
EMSL Analytical, Inc.
24 West Steuben Street, Suite 102
Bath, NY 14810

Dear Bonnie Soles:

Certificate Number 1269

This is to acknowledge the receipt of your correspondence dated September 11, 2015, concerning the transfer of ownership of Hygeia Laboratories, Inc. to LA Testing - Sierra Madre. The submitted Proficiency Testing results (ERA WS-228, NVLAP Round M12014 and AIHS PATs Round 91 & 92) analyzed by Hygeia Laboratories, Inc. were reviewed, pursuant to California Code of Regulations, Title 22, §64827(d)(2), and found acceptable. LA Testing - Sierra Madre will be granted use of Hygeia's existing ELAP Certificate Number 1269 until it expires on July 31, 2016. At that time, LA Testing – Sierra Madre must apply for a new certificate number under the new name.

There has been no lapse in the certification of the laboratory holding ELAP Certificate Number 1269 during the transfer of ownership. This letter must be displayed at the laboratory.

If you have any questions, please contact me at (916) 323-3427 or
Maryam.Khosravifard@waterboards.ca.gov

Sincerely,



Maryam Khosravifard
Senior Environmental Scientist (Supervisory)
Program Development and Research Unit
Environmental Laboratory Accreditation Program



CALIFORNIA STATE
ENVIRONMENTAL LABORATORY ACCREDITATION PROGRAM

CERTIFICATE OF ENVIRONMENTAL LABORATORY ACCREDITATION

Is hereby granted to

Hygeia Laboratories, Inc.

Sierra Madre

82 West Sierra Madre Boulevard

Sierra Madre, CA 91024

Scope of the certificate is limited to the
"Fields of Testing"
which accompany this Certificate.

Continued accredited status depends on successful completion of on-site,
proficiency testing studies, and payment of applicable fees.

This Certificate is granted in accordance with provisions of
Section 100825, et seq. of the Health and Safety Code.

Certificate No.: **1269**

Expiration Date: **07/31/2016**

Effective Date: **08/01/2014**

Richmond, California
subject to forfeiture or revocation


Christine Sotelo, Chief
California State Environmental Laboratory Accreditation Program



California Environmental Protection Agency

Water Resources Control Board

Environmental Laboratory Accreditation Program



EDMUND G. BROWN JR.
Governor

July 17, 2014

Arturo Casas
Hygeia Laboratories, Inc.
82 West Sierra Madre Boulevard
Sierra Madre, CA 91024

Dear Arturo Casas:

Certificate No. 1269

This is to advise you that the laboratory named above continues to be certified as an environmental testing laboratory pursuant to the provisions of the Health and Safety Code (HSC), Division 101, Part 1, Chapter 4, Section 100825, et seq. Certification for all currently certified Fields of Testing that the laboratory has applied for renewal shall remain in effect until **07/31/2016** unless it is revoked.

Please note that the renewal application for certification is subject to an on-site process, and the continued use of this certificate is contingent upon:

- * **successful completion of the on-site process;**
- * **acceptable performance in the required proficiency testing (PT) studies;**
- * **timely payment of all fees, including an annual fee due before July 31, 2015;**
- * **compliance with Environmental Laboratory Accreditation Program (ELAP); statutes (HSC, Section 100825, et seq.) and Regulations (California Code of Regulations (CCR), Title 22, Division 4, Chapter 19).**

An updated certificate of the "Fields of Testing" will be issued to the laboratory upon successful completion of the on-site process.

The application for the renewal of this certificate must be received before the expiration date to remain in force according to the HSC100845(a).

Please note that the laboratory is required to notify ELAP of any major changes in the laboratory such as the transfer of ownership, change of laboratory director, change in location, or structural alterations which may affect adversely the quality of analyses (HSC, Section 100845(b)(d)). Please include the above certificate number in all your correspondence with ELAP.

If you have any questions, please contact ELAP at (510) 620-3155.

Sincerely,


Christine Sotelo, Chief

California State Environmental Laboratory Accreditation Program



California State

Environmental Laboratory Accreditation Program



EDMUND G. BROWN JR.
Governor

September 11, 2014

Arturo Casas
Hygeia Laboratories, Inc.
82 West Sierra Madre Boulevard
Sierra Madre, CA 91024

Dear Arturo Casas:

Certificate No. 1269

This is to advise you that the laboratory named above has been certified as an environmental testing laboratory pursuant to the provisions of the Health and Safety Code (HSC), Division 101, Part 1, Chapter 4, Section 100825, *et seq.*

The Fields of Testing for which this laboratory has been certified are indicated on the enclosed "Fields of Testing." The certificate shall remain in effect until **July 31, 2016** unless it is revoked. This certificate is subject to an annual fee as prescribed by HSC 100860.1(a).

The application for renewal of this certificate must be received before the expiration date of this certificate to remain in force according to the HSC 100845(a).

Any changes in laboratory location or structural alterations, which may affect adversely the quality of analysis in the Fields of Testing for which this laboratory has been granted a certificate, require prior notification. Notification is also required for changes in ownership or laboratory director within 30 days after the change (HSC, Section 100845(b) and (d)).

Your continued cooperation with the above requirements is essential for maintaining the high quality of the data produced by environmental laboratories certified by the State of California.

If you have any questions, please contact Bill Walker at (818) 551-2012.

Sincerely,



Christine Sotelo, Chief
Environmental Laboratory Accreditation Program

Enclosure



CALIFORNIA STATE
ENVIRONMENTAL LABORATORY ACCREDITATION PROGRAM
Accredited Fields of Testing



Hygeia Laboratories, Inc.
Sierra Madre
82 West Sierra Madre Boulevard
Sierra Madre, CA 91024
Phone: (626) 355-4711

Certificate No.: 1269
Renew Date: 7/31/2016

Field of Testing: 103 - Toxic Chemical Elements of Drinking Water

103.125	010	Lead	EPA 200.5
103.301	001	Asbestos	EPA 100.2

Field of Testing: 114 - Inorganic Chemistry of Hazardous Waste

114.130	001	Lead	EPA 7420
---------	-----	------	----------

Field of Testing: 115 - Extraction Test of Hazardous Waste

115.021	001	TCLP Inorganics	EPA 1311
115.030	001	Waste Extraction Test (WET)	CCR Chapter 11, Article 5, Appendix II

Field of Testing: 121 - Bulk Asbestos Analysis of Hazardous Waste

121.010	001	Bulk Asbestos	EPA 600/M4-82-020
---------	-----	---------------	-------------------

NOTICE

The “List of Approved Fields of Testing and Analytes”, as stated on this certificate will be sent to your laboratory upon completion of the entire certification process, which includes an on-site inspection and participation in the appropriate PT studies.

United States Department of Commerce
National Institute of Standards and Technology



Certificate of Accreditation to ISO/IEC 17025:2005

NVLAP LAB CODE: 102116-0

LA Testing - Sierra Madre
Sierra Madre, CA

*is accredited by the National Voluntary Laboratory Accreditation Program for specific services,
listed on the Scope of Accreditation, for:*

Asbestos Fiber Analysis

*This laboratory is accredited in accordance with the recognized International Standard ISO/IEC 17025:2005.
This accreditation demonstrates technical competence for a defined scope and the operation of a laboratory quality
management system (refer to joint ISO-ILAC-IAF Communiqué dated January 2009).*

2015-09-04 through 2016-06-30

Effective Dates



A handwritten signature in blue ink, appearing to read "Gary R. M...".

For the National Voluntary Laboratory Accreditation Program



SCOPE OF ACCREDITATION TO ISO/IEC 17025:2005

LA Testing - Sierra Madre

82 W. Sierra Madre Blvd.

Sierra Madre, CA 91024-2434

Mr. Arturo Casas

Phone: 626-355-4711 Fax: 626-355-4497

Email: arturo.casas@emsl.com

<http://www.emsl.com>

ASBESTOS FIBER ANALYSIS

NVLAP LAB CODE 102116-0

Bulk Asbestos Analysis

<u>Code</u>	<u>Description</u>
18/A01	EPA 600/M4-82-020: Interim Method for the Determination of Asbestos in Bulk Insulation Samples
18/A03	EPA 600/R-93/116: Method for the Determination of Asbestos in Bulk Building Materials

Airborne Asbestos Analysis

<u>Code</u>	<u>Description</u>
18/A02	U.S. EPA's "Interim Transmission Electron Microscopy Analytical Methods-Mandatory and Nonmandatory-and Mandatory Section to Determine Completion of Response Actions" as found in 40 CFR, Part 763, Subpart E, Appendix A.

A handwritten signature in blue ink, appearing to read "Arturo Casas".

For the National Voluntary Laboratory Accreditation Program

Asbestos

Analytical Report
Chain of Custodies
Sample Location Maps

Asbestos





LA Testing

82 West Sierra Madre Boulevard Sierra Madre, CA 91
Tel/Fax: (626) 355-4711 / (626) 355-4497
<http://www.LATesting.com> / sierramadrelab@latesting.co

LA Testing Order: 451600908
Customer ID: 32CONV56
Customer PO:
Project ID:

Attention: Laura Tanaka
Converse Consultants
717 S Myrtle Avenue
Monrovia, CA 91016

Phone: (626) 930-1200
Fax: (626) 930-1212
Received Date: 03/14/2016 11:30 AM
Analysis Date: 03/16/2016
Collected Date: 03/11/2016

Project: 12-41-290-09 / DPW/Mira Loma Temp Mod - Building 27

Test Report: Asbestos Analysis of Bulk Materials via EPA 600/R-93/116 Method using Polarized Light Microscopy

Sample	Description	Appearance	Non-Asbestos		Asbestos
			% Fibrous	% Non-Fibrous	% Type
27-01 <small>451600908-0001</small>	Carpet mastic - 27-34	Yellow Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
27-02 <small>451600908-0002</small>	Carpet mastic - 27-23	Yellow Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
27-03 <small>451600908-0003</small>	Carpet mastic - 27-11	Yellow Non-Fibrous Homogeneous	3% Cellulose 2% Synthetic	95% Non-fibrous (Other)	None Detected
27-04-Floor Tile <small>451600908-0004</small>	12" RFT/mastic - corridor adj to holding cell A	Gray Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
27-04-Mastic <small>451600908-0004A</small>	12" RFT/mastic - corridor adj to holding cell A	Yellow Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
27-05-Floor Tile <small>451600908-0005</small>	12" RFT/mastic - waiting room	Gray Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
27-05-Mastic <small>451600908-0005A</small>	12" RFT/mastic - waiting room	Yellow Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
27-06-Floor Tile <small>451600908-0006</small>	12" RFT/mastic - 27-14	White Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
27-06-Mastic <small>451600908-0006A</small>	12" RFT/mastic - 27-14	Yellow Non-Fibrous Homogeneous	10% Cellulose	90% Non-fibrous (Other)	None Detected
27-07 <small>451600908-0007</small>	Flooring mastic - holding cell A	Yellow Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
27-08 <small>451600908-0008</small>	Flooring mastic - holding cell C	Yellow Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
27-09 <small>451600908-0009</small>	Flooring mastic - holding cell B	Yellow Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
27-10 <small>451600908-0010</small>	Flooring mastic - holding cell C	Brown Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
27-11 <small>451600908-0011</small>	Flooring mastic - holding cell C	Brown Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
27-12 <small>451600908-0012</small>	Flooring mastic - holding cell C	Brown Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
27-13 <small>451600908-0013</small>	Drywall/joint compound composite - 27-09	Brown/White Non-Fibrous Homogeneous	20% Cellulose	80% Non-fibrous (Other)	None Detected

Report amended: 03/21/2016 12:49:57 Replaces initial report from: 03/17/2016 11:11:42 Reason Code: Data Entry-Samples Added



LA Testing

82 West Sierra Madre Boulevard Sierra Madre, CA 91
Tel/Fax: (626) 355-4711 / (626) 355-4497
<http://www.LATesting.com> / sierramadrelab@latesting.co

LA Testing Order: 451600908
Customer ID: 32CONV56
Customer PO:
Project ID:

Test Report: Asbestos Analysis of Bulk Materials via EPA 600/R-93/116 Method using Polarized Light Microscopy

Sample	Description	Appearance	Non-Asbestos		Asbestos
			% Fibrous	% Non-Fibrous	% Type
27-14 451600908-0014	Drywall/joint compound composite - 27-23	Brown/White Fibrous Homogeneous	20% Cellulose	80% Non-fibrous (Other)	None Detected
27-15 451600908-0015	Drywall/joint compound composite - partition wall @ reception area	White Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
27-16 451600908-0016	Drywall/joint compound composite - 27-19	Brown/White Fibrous Homogeneous	20% Cellulose	80% Non-fibrous (Other)	None Detected
27-17 451600908-0017	Drywall/joint compound composite - attorney office corridor	Brown/White Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
27-18 451600908-0018	Drywall/joint compound composite - holding cell corridor	White Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
27-19 451600908-0019	Drywall/joint compound composite - reception area	Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
27-20 451600908-0020	2' x 4' ceiling panel - attorney office 27-38	Gray/White Fibrous Homogeneous	40% Cellulose 40% Glass	20% Non-fibrous (Other)	None Detected
27-21 451600908-0021	2' x 4' ceiling panel - court room 27-23	Gray/White Fibrous Homogeneous	40% Cellulose 40% Glass	20% Non-fibrous (Other)	None Detected
27-22 451600908-0022	2' x 4' ceiling panel - reception area	Tan/White Fibrous Homogeneous	25% Cellulose 10% Glass	65% Non-fibrous (Other)	None Detected
27-23 451600908-0023	Roof core - roof	White Non-Fibrous Homogeneous	60% Cellulose	40% Non-fibrous (Other)	None Detected
27-24 451600908-0024	Roof core - roof	White/Black Non-Fibrous Homogeneous	20% Cellulose 25% Glass	55% Non-fibrous (Other)	None Detected
27-25 451600908-0025	Roof core - roof	Gray/Tan/White Fibrous Homogeneous	10% Synthetic 20% Glass	70% Non-fibrous (Other)	None Detected

Analyst(s)

Arturo Casas (9)
Wesene Sebhat (19)

Arturo Casas Laboratory Manager
or Other Approved Signatory

EMSL maintains liability limited to cost of analysis. This report relates only to the samples reported and may not be reproduced, except in full, without written approval by EMSL. EMSL bears no responsibility for sample collection activities or analytical method limitations. Interpretation and use of test results are the responsibility of the client. This report must not be used by the client to claim product certification, approval, or endorsement by NVLAP, NIST or any agency of the federal government. Non-friable organically bound materials present a problem matrix and therefore EMSL recommends gravimetric reduction prior to analysis. Samples received in good condition unless otherwise noted. Estimated accuracy, precision and uncertainty data available upon request. Unless requested by the client, building materials manufactured with multiple layers (i.e. linoleum, wallboard, etc.) are reported as a single sample. Reporting limit is 1%

Samples analyzed by LA Testing Sierra Madre, CA NVLAP Lab Code 102116-0, CA ELAP 1269

Report amended: 03/21/2016 12:49:57 Replaces initial report from: 03/17/2016 11:11:42 Reason Code: Data Entry-Samples Added



Asbestos Chain of Custody

EMSL Order Number (Lab Use Only):

451600908

Sierra Madre, CA 91024
PHONE: 626-355-4711
FAX: 626-355-4497

Company Name : Converse Consultants		EMSL Customer ID:	
Street: 222 East Huntington Drive Suite 211		City: Monrovia	State/Province: CA
Zip/Postal Code: 91016	Country: United States	Telephone #: 626-807-3422	Fax #: 626-930-1212
Report To (Name): Laura Tanaka		Please Provide Results: <input type="checkbox"/> Fax <input checked="" type="checkbox"/> Email	
Email Address: ltanaka@converseconsultants.com		Purchase Order: 12-41-290-09	
Project Name/Number: Mira Loma Temp Mod Bldg (27)		EMSL Project ID (Internal Use Only):	
U.S. State Samples Taken: CA		CT Samples: <input type="checkbox"/> Commercial/Taxable <input type="checkbox"/> Residential/Tax Exempt	

EMSL-Bill to: Same Different - If Bill to is Different note instructions in Comments**
Third Party Billing requires written authorization from third party

Turnaround Time (TAT) Options* - Please Check

3 Hour 6 Hour 24 Hour 48 Hour 72 Hour 96 Hour 1 Week 2 Week

*For TEM Air 3 hr through 6 hr, please call ahead to schedule. *There is a premium charge for 3 Hour TEM AHERA or EPA Level II TAT. You will be asked to sign an authorization form for this service. Analysis completed in accordance with EMSL's Terms and Conditions located in the Analytical Price Guide.

<p>PCM - Air <input type="checkbox"/> Check if samples are from NY</p> <p><input type="checkbox"/> NIOSH 7400</p> <p><input type="checkbox"/> w/ OSHA 8hr. TWA</p> <p>PLM - Bulk (reporting limit)</p> <p><input checked="" type="checkbox"/> PLM EPA 600/R-93/116 (<1%)</p> <p><input type="checkbox"/> PLM EPA NOB (<1%)</p> <p>Point Count</p> <p><input type="checkbox"/> 400 (<0.25%) <input type="checkbox"/> 1000 (<0.1%)</p> <p>Point Count w/Gravimetric</p> <p><input type="checkbox"/> 400 (<0.25%) <input type="checkbox"/> 1000 (<0.1%)</p> <p><input type="checkbox"/> NYS 198.1 (friable in NY)</p> <p><input type="checkbox"/> NYS 198.6 NOB (non-friable-NY)</p> <p><input type="checkbox"/> NYS 198.8 SOF-V</p> <p><input type="checkbox"/> NIOSH 9002 (<1%)</p>	<p>TEM - Air <input type="checkbox"/> 4-4.5hr TAT (AHERA only)</p> <p><input type="checkbox"/> AHERA 40 CFR, Part 763</p> <p><input type="checkbox"/> NIOSH 7402</p> <p><input type="checkbox"/> EPA Level II</p> <p><input type="checkbox"/> ISO 10312</p> <p>TEM - Bulk</p> <p><input type="checkbox"/> TEM EPA NOB</p> <p><input type="checkbox"/> NYS NOB 198.4 (non-friable-NY)</p> <p><input type="checkbox"/> Chatfield SOP</p> <p><input type="checkbox"/> TEM Mass Analysis-EPA 600 sec. 2.5</p> <p>TEM - Water: EPA 100.2</p> <p>Fibers >10µm <input type="checkbox"/> Waste <input type="checkbox"/> Drinking</p> <p>All Fiber Sizes <input type="checkbox"/> Waste <input type="checkbox"/> Drinking</p>	<p>TEM- Dust</p> <p><input type="checkbox"/> Microvac - ASTM D 5755</p> <p><input type="checkbox"/> Wipe - ASTM D6480</p> <p><input type="checkbox"/> Carpet Sonication (EPA 600/J-93/167)</p> <p>Soil/Rock/Vermiculite*</p> <p><input type="checkbox"/> PLM CARB 435 - A (0.25% sensitivity)</p> <p><input type="checkbox"/> PLM CARB 435 - B (0.1% sensitivity)</p> <p><input type="checkbox"/> TEM CARB 435 - B (0.1% sensitivity)</p> <p><input type="checkbox"/> TEM CARB 435 - C (0.01% sensitivity)</p> <p><input type="checkbox"/> TEM Qual. via Filtration Technique</p> <p><input type="checkbox"/> TEM Qual. via Drop-Mount Technique</p> <p><small>*Can not accept New York State Loose Fill Vermiculite Samples</small></p> <p>Other:</p> <p><input type="checkbox"/></p>
---	--	---

Check For Positive Stop - Clearly Identify Homogenous Group **Filter Pore Size (Air Samples):** 0.8µm 0.45µm

Samplers Name: _____ **Samplers Signature:** _____

Sample #	Sample Description	Volume/Area (Air) HA # (Bulk)	Date/Time Sampled
	SEE ATTACHED		

Client Sample # (s): -	Total # of Samples: 25
Relinquished (Client): <i>L Tanaka</i> Date: 03.14.16	Time: 11:30
Received (Lab): <i>(D)oot (w)</i> Date: 3.14.16	Time: 11:30 AM
Comments/Special Instructions:	



Converse Consultants

717 Myrtle Avenue
Monrovia, CA 91016-3500
Tel.: (626) 930-1200
Fax: (626)930-1212

BULK SAMPLE LOG

Project Name: DPW/Mira Loma Temp Mod Buildings

Collected By: L. Cattaneo

Project No.: 12-41-290-09

Date: 03-11-16

HOMOGENEOUS MATERIAL: carpet mastic (yellow)

Sample Number	Location	Area Sq. Ft.	Condition
27-01	ROOM 27-34 - SE corner office	9,200#	GOOD
27-02	ROOM 27-23 COURT RM. NW corner	↓	GOOD
27-03	ROOM 27-11 - SW corner.		GOOD

Friability:	Friable	Non-Friable	
Potential for Contact with Material:	High	Moderate	Low
Influence of Vibration:	High	Moderate	Low
Potential for Air Erosion:	High	Moderate	Low
Damage Assessment:	Good	Damaged	Significantly Damaged

COMMENTS: _____

CHAIN OF CUSTODY

Relinquished By: <u>[Signature]</u>	Time: <u>11:30</u>	Date: <u>03-14-16</u>
Received By: <u>[Signature]</u>	Time: <u>+</u>	Date: <u>+</u>
Relinquished By: _____	Time: _____	Date: _____
Received By: _____	Time: _____	Date: _____



Converse Consultants

717 Myrtle Avenue
Monrovia, CA 91016-3500
Tel.: (626) 930-1200
Fax: (626)930-1212

BULK SAMPLE LOG

Project Name: DPW/Mira Loma Temp Mod Buildings

Collected By: L. Cattaneo

Project No.: 12-41-290-09

Date: 03-11-16

HOMOGENEOUS MATERIAL: 12" x 12" RFT (white w/ gray sinter) & Mastic (yellow)

Sample Number	Location	Area Sq. Ft.	Condition
27-04	corridor adjacent to Holding cell - A	2,400#	GOOD
27-05	waiting RM SW - East side.	↓	GOOD
27-06	ROOM 27-14 - East center.	↓	GOOD

Friability:
Potential for Contact with Material:
Influence of Vibration:
Potential for Air Erosion:
Damage Assessment:

Friable
High
High
High
Good

Non-Friable
Moderate
Moderate
Moderate
Damaged

Low
Low
Low
Significantly Damaged

COMMENTS: _____

CHAIN OF CUSTODY

Relinquished By: [Signature]
Received By: [Signature]
Relinquished By: _____
Received By: _____

Time: 11:30
Time: +
Time: _____
Time: _____

Date: 03-14-16
Date: +
Date: _____
Date: _____



Converse Consultants

717 Myrtle Avenue
Monrovia, CA 91016-3500
Tel.: (626) 930-1200
Fax: (626)930-1212

BULK SAMPLE LOG

Project Name: DPW/Mira Loma Temp Mod Buildings

Collected By: L. Cattaneo

Project No.: 12-41-290-09

Date: 03-11-16

HOMOGENEOUS MATERIAL: Mastic under RUBBER floor Mat. (yellow)

Sample Number	Location	Area Sq. Ft.	Condition
21-07	Holding cell A - SW corner	1,600#	GOOD
21-08	Holding cell C - SE corner	↓	GOOD
21-09	Holding cell B - west side.		GOOD

Friability:	Friable	Non-Friable	
Potential for Contact with Material:	High	Moderate	Low
Influence of Vibration:	High	Moderate	Low
Potential for Air Erosion:	High	Moderate	Low
Damage Assessment:	Good	Damaged	Significantly Damaged

COMMENTS: _____

CHAIN OF CUSTODY

Relinquished By: <u>L. Cattaneo</u>	Time: <u>11:30</u>	Date: <u>03-14-16</u>
Received By: <u>[Signature]</u>	Time: <u>1</u>	Date: <u>1</u>
Relinquished By: _____	Time: _____	Date: _____
Received By: _____	Time: _____	Date: _____



Converse Consultants

717 Myrtle Avenue
Monrovia, CA 91016-3500
Tel.: (626) 930-1200
Fax: (626)930-1212

BULK SAMPLE LOG

Project Name: DPW/Mira Loma Temp Mod Buildings

Collected By: L. Cattaneo

Project No.: 12-41-290-09

Date: 03-11-16

HOMOGENEOUS MATERIAL:

Mastic under RUBBER floor mat (Brown)

Sample Number	Location	Area Sq. Ft.	Condition
27-10	holding cell C - EAST SIDE	57	EXPOSED
27-11	holding cell C - EAST SIDE	↓	↓
27-12	holding cell C - EAST SIDE	↓	↓

Friability:	Friable	Non-Friable	
Potential for Contact with Material:	High	Moderate	Low
Influence of Vibration:	High	Moderate	Low
Potential for Air Erosion:	High	Moderate	Low
Damage Assessment:	Good	Damaged	Significantly Damaged

COMMENTS: Brown mastic found in one location, possibly patched. @ later date.

CHAIN OF CUSTODY

Relinquished By: L. Cattaneo Time: 11:30 Date: 03-14-16
 Received By: [Signature] Time: 1 Date: 1
 Relinquished By: _____ Time: _____ Date: _____
 Received By: _____ Time: _____ Date: _____



Converse Consultants

717 Myrtle Avenue
Monrovia, CA 91016-3500
Tel.: (626) 930-1200
Fax: (626)930-1212

BULK SAMPLE LOG

Project Name: DPW/Mira Loma Temp Mod Buildings

Collected By: Cattaneo / A. Romero

Project No.: 12-41-290-09

Date: 03-11-16

HOMOGENEOUS MATERIAL: Drywall / joint compound composite

Sample Number	Location	Area Sq. Ft.	Condition
27-13	Room 27-09 - East wall	36,000#	Good
27-14	Room 27-23 - south near door.	↓	Good
27-15	partition wall @ reception area.		Good
27-16	Room 27-19 Tel/com - south wall		Good
27-17	Attorney Office Corridor - East wall		Good
27-18	Holding Cell Corridor - East Wall - South End		Good
27-19	Reception Area - South Wall		Good

Friability:
Potential for Contact with Material:
Influence of Vibration:
Potential for Air Erosion:
Damage Assessment:

Friable
High
High
High
Good

Non-Friable
Moderate
Moderate
Moderate
Damaged

Low
Low
Low
Significantly Damaged

COMMENTS: _____

Drywall Ceiling is unfinished w/no J.C. (11,500#)

Drywall Walls w/JC (24,500#)

CHAIN OF CUSTODY

Relinquished By: [Signature]
Received By: _____
Relinquished By: _____
Received By: _____

Time: 11:30
Time: 1
Time: _____
Time: _____

Date: 03-14-16
Date: 1
Date: _____
Date: _____



Converse Consultants

717 Myrtle Avenue
Monrovia, CA 91016-3500
Tel.: (626) 930-1200
Fax: (626)930-1212

BULK SAMPLE LOG

Project Name: DPW/Mira Loma Temp Mod Buildings

Collected By: A. Romero

Project No.: 12-41-290-09

Date: 03-11-16

HOMOGENEOUS MATERIAL: 2x4' Fissure Ceiling Panels

Sample Number	Location	Area Sq. Ft.	Condition
27-20	Attorney Office 27-38 - S. West side of ceiling	10,000 #	Good
27-21	Court Rm B-27-23 - North side of ceiling	↓	↓
27-22	Reception Area - S. East side of ceiling	↓	↓

Friability:	Friable	Non-Friable	
Potential for Contact with Material:	High	Moderate	Low
Influence of Vibration:	High	Moderate	Low
Potential for Air Erosion:	High	Moderate	Low
Damage Assessment:	Good	Damaged	Significantly Damaged

COMMENTS: _____

CHAIN OF CUSTODY

Relinquished By: <u>[Signature]</u>	Time: <u>11:30</u>	Date: <u>03-14-16</u>
Received By: <u>[Signature]</u>	Time: <u>1</u>	Date: <u>1</u>
Relinquished By: _____	Time: _____	Date: _____
Received By: _____	Time: _____	Date: _____



Converse Consultants

451600908

717 Myrtle Avenue
Monrovia, CA 91016-3500
Tel.: (626) 930-1200
Fax: (626)930-1212

BULK SAMPLE LOG

Project Name: DPW/Mira Loma Temp Mod Buildings

Collected By: A. Romero

Project No.: 12-41-290-09

Date: 03-11-16

HOMOGENEOUS MATERIAL: Roof Core

Sample Number	Location	Area Sq. Ft.	Condition
27-23	Bldg 27 Roof - East Side	12,200	Good
27-24	Bldg. 27 Roof - Center	↓	↓
27-25	Bldg 27 Roof - West Side	↓	↓

Friability:	Friable	Non-Friable	
Potential for Contact with Material:	High	Moderate	Low
Influence of Vibration:	High	Moderate	Low
Potential for Air Erosion:	High	Moderate	Low
Damage Assessment:	Good	Damaged	Significantly Damaged

COMMENTS: _____

CHAIN OF CUSTODY

Relinquished By: <u>[Signature]</u>	Time: <u>11:30</u>	Date: <u>03-14-16</u>
Received By: <u>[Signature]</u>	Time: <u>1</u>	Date: <u>1</u>
Relinquished By: _____	Time: _____	Date: _____
Received By: _____	Time: _____	Date: _____



LA Testing

82 West Sierra Madre Boulevard Sierra Madre, CA 91
Tel/Fax: (626) 355-4711 / (626) 355-4497
<http://www.LATesting.com> / sierramadrelab@latestesting.co

LA Testing Order: 451600910

Customer ID: 32CONV56

Customer PO:

Project ID:

Attention: Laura Tanaka
Converse Consultants
717 S Myrtle Avenue
Monrovia, CA 91016

Phone: (626) 930-1200
Fax: (626) 930-1212
Received Date: 03/14/2016 11:30 AM
Analysis Date: 03/16/2016
Collected Date: 03/11/2016

Project: 12-41-290-09 / DPW/Mira Loma Temp Mod -Building 28

Test Report: Asbestos Analysis of Bulk Materials via EPA 600/R-93/116 Method using Polarized Light Microscopy

Sample	Description	Appearance	Non-Asbestos		Asbestos
			% Fibrous	% Non-Fibrous	% Type
28-01 <small>451600910-0001</small>	2' x 4' ceiling panel - office area	Gray/White Non-Fibrous Homogeneous	40% Cellulose 40% Glass	20% Non-fibrous (Other)	None Detected
28-02 <small>451600910-0002</small>	2' x 4' ceiling panel - office area	Gray/White Non-Fibrous Homogeneous	40% Cellulose 40% Glass	20% Non-fibrous (Other)	None Detected
28-03 <small>451600910-0003</small>	2' x 4' ceiling panel - locker room	Gray/White Non-Fibrous Homogeneous	40% Cellulose 30% Glass	30% Non-fibrous (Other)	None Detected
28-04 <small>451600910-0004</small>	Drywall/joint compound composite - office	Brown/White Fibrous Homogeneous	20% Cellulose	80% Non-fibrous (Other)	None Detected
28-05 <small>451600910-0005</small>	Drywall/joint compound composite - locker	Brown/White Fibrous Homogeneous	20% Cellulose	80% Non-fibrous (Other)	None Detected
28-06 <small>451600910-0006</small>	Drywall/joint compound composite - locker	White Non-Fibrous Homogeneous	10% Cellulose	90% Non-fibrous (Other)	None Detected
28-07 <small>451600910-0007</small>	Carpet mastic - locker room	Yellow Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
28-08 <small>451600910-0008</small>	Carpet mastic - office	Gray Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
28-09 <small>451600910-0009</small>	Carpet mastic - office	Yellow Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
28-10 <small>451600910-0010</small>	Exterior texture coat - outside lockers, on metal	Gray Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
28-11 <small>451600910-0011</small>	Exterior texture coat - outside offices on stairs	Gray Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
28-12 <small>451600910-0012</small>	Exterior texture coat - outside office on walkway	Gray Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
28-13 <small>451600910-0013</small>	Roof core - roof	White/Black Non-Fibrous Homogeneous	10% Cellulose	90% Non-fibrous (Other)	None Detected
28-14 <small>451600910-0014</small>	Roof core - roof	White/Black Non-Fibrous Homogeneous	10% Cellulose	90% Non-fibrous (Other)	None Detected
28-15 <small>451600910-0015</small>	Roof core - roof	Black/Silver Non-Fibrous Homogeneous		98% Non-fibrous (Other)	2% Chrysotile



LA Testing

82 West Sierra Madre Boulevard Sierra Madre, CA 91
Tel/Fax: (626) 355-4711 / (626) 355-4497
<http://www.LATesting.com> / sierramadrelab@lateesting.co

LA Testing Order: 451600910
Customer ID: 32CONV56
Customer PO:
Project ID:

Test Report: Asbestos Analysis of Bulk Materials via EPA 600/R-93/116 Method using Polarized Light Microscopy

Sample	Description	Appearance	Non-Asbestos		Asbestos
			% Fibrous	% Non-Fibrous	% Type

Analyst(s)
Nahid Motamedi (5)
Wesene Sebhat (10)


Arturo Casas Laboratory Manager
or Other Approved Signatory

EMSL maintains liability limited to cost of analysis. This report relates only to the samples reported and may not be reproduced, except in full, without written approval by EMSL. EMSL bears no responsibility for sample collection activities or analytical method limitations. Interpretation and use of test results are the responsibility of the client. This report must not be used by the client to claim product certification, approval, or endorsement by NVLAP, NIST or any agency of the federal government. Non-friable organically bound materials present a problem matrix and therefore EMSL recommends gravimetric reduction prior to analysis. Samples received in good condition unless otherwise noted. Estimated accuracy, precision and uncertainty data available upon request. Unless requested by the client, building materials manufactured with multiple layers (i.e. linoleum, wallboard, etc.) are reported as a single sample. Reporting limit is 1%

Samples analyzed by LA Testing Sierra Madre, CA NVLAP Lab Code 102116-0, CA ELAP 1269

Initial Report From: 03/17/2016 14:17:23



Asbestos Chain of Custody

EMSL Order Number (Lab Use Only):

451600910

Sierra Madre, CA 91024
PHONE: 626-355-4711
FAX: 626-355-4497

Company Name : Converse Consultants		EMSL Customer ID:	
Street: 222 East Huntington Drive Suite 211		City: Monrovia	State/Province: CA
Zip/Postal Code: 91016	Country: United States	Telephone #: 626-807-3422	Fax #: 626-930-1212
Report To (Name): Laura Tanaka		Please Provide Results: <input type="checkbox"/> Fax <input checked="" type="checkbox"/> Email	
Email Address: ltanaka@converseconsultants.com		Purchase Order: 12-41-290-09	
Project Name/Number: Mira Loma Temp Mod Bldg (28)		EMSL Project ID (Internal Use Only):	
U.S. State Samples Taken: CA		CT Samples: <input type="checkbox"/> Commercial/Taxable <input type="checkbox"/> Residential/Tax Exempt	

EMSL-Bill to: Same Different - If Bill to is Different note instructions in Comments**
Third Party Billing requires written authorization from third party

Turnaround Time (TAT) Options* - Please Check

- 3 Hour
 6 Hour
 24 Hour
 48 Hour
 72 Hour
 96 Hour
 1 Week
 2 Week

*For TEM Air 3 hr through 6 hr, please call ahead to schedule. *There is a premium charge for 3 Hour TEM AHERA or EPA Level II TAT. You will be asked to sign an authorization form for this service. Analysis completed in accordance with EMSL's Terms and Conditions located in the Analytical Price Guide.

<p>PCM - Air <input type="checkbox"/> Check if samples are from NY</p> <p><input type="checkbox"/> NIOSH 7400</p> <p><input type="checkbox"/> w/ OSHA 8hr. TWA</p> <p>PLM - Bulk (reporting limit)</p> <p><input checked="" type="checkbox"/> PLM EPA 600/R-93/116 (<1%)</p> <p><input type="checkbox"/> PLM EPA NOB (<1%)</p> <p>Point Count</p> <p><input type="checkbox"/> 400 (<0.25%) <input type="checkbox"/> 1000 (<0.1%)</p> <p>Point Count w/Gravimetric</p> <p><input type="checkbox"/> 400 (<0.25%) <input type="checkbox"/> 1000 (<0.1%)</p> <p><input type="checkbox"/> NYS 198.1 (friable in NY)</p> <p><input type="checkbox"/> NYS 198.6 NOB (non-friable-NY)</p> <p><input type="checkbox"/> NYS 198.8 SOF-V</p> <p><input type="checkbox"/> NIOSH 9002 (<1%)</p>	<p>TEM - Air <input type="checkbox"/> 4-4.5hr TAT (AHERA only)</p> <p><input type="checkbox"/> AHERA 40 CFR, Part 763</p> <p><input type="checkbox"/> NIOSH 7402</p> <p><input type="checkbox"/> EPA Level II</p> <p><input type="checkbox"/> ISO 10312</p> <p>TEM - Bulk</p> <p><input type="checkbox"/> TEM EPA NOB</p> <p><input type="checkbox"/> NYS NOB 198.4 (non-friable-NY)</p> <p><input type="checkbox"/> Chatfield SOP</p> <p><input type="checkbox"/> TEM Mass Analysis-EPA 600 sec. 2.5</p> <p>TEM - Water: EPA 100.2</p> <p>Fibers >10µm <input type="checkbox"/> Waste <input type="checkbox"/> Drinking</p> <p>All Fiber Sizes <input type="checkbox"/> Waste <input type="checkbox"/> Drinking</p>	<p>TEM- Dust</p> <p><input type="checkbox"/> Microvac - ASTM D 5755</p> <p><input type="checkbox"/> Wipe - ASTM D6480</p> <p><input type="checkbox"/> Carpet Sonication (EPA 600/J-93/167)</p> <p>Soil/Rock/Vermiculite*</p> <p><input type="checkbox"/> PLM CARB 435 - A (0.25% sensitivity)</p> <p><input type="checkbox"/> PLM CARB 435 - B (0.1% sensitivity)</p> <p><input type="checkbox"/> TEM CARB 435 - B (0.1% sensitivity)</p> <p><input type="checkbox"/> TEM CARB 435 - C (0.01% sensitivity)</p> <p><input type="checkbox"/> TEM Qual. via Filtration Technique</p> <p><input type="checkbox"/> TEM Qual. via Drop-Mount Technique</p> <p><small>*Can not accept New York State Loose Fill Vermiculite Samples</small></p> <p>Other:</p> <p><input type="checkbox"/></p>
---	--	---

Check For Positive Stop - Clearly Identify Homogenous Group **Filter Pore Size (Air Samples):** 0.8µm 0.45µm

Samplers Name: _____ **Samplers Signature:** _____

Sample #	Sample Description	Volume/Area (Air) HA # (Bulk)	Date/Time Sampled
	SEE ATTACHED		

Client Sample # (s): See attached.	Total # of Samples: 15
Relinquished (Client): L Tanaka	Date: 03-14-16 Time: 11:30
Received (Lab): [Signature] (w)	Date: 3.14.16 Time: 11:30 AM
Comments/Special Instructions:	



Converse Consultants

BULK SAMPLE LOG

Project Name: DPW/Mira Loma Temp Mod Buildings

Collected By: L. Caffaro

Project No.: 12-41-290-09

Date: 03-11-16

HOMOGENEOUS MATERIAL: 2'x4' Acoustic ceiling panel (fissured w/holes)

Sample Number	Location	Area Sq. Ft.	Condition
28-01	(02) office area south ^{west} wall	1,360	Good
28-02	(02) office area NW wall	↓	↓
28-03	(01) Locker Room south wall	↓	↓

Friability:	Friable	Non-Friable	
Potential for Contact with Material:	High	Moderate	Low
Influence of Vibration:	High	Moderate	Low
Potential for Air Erosion:	High	Moderate	Low
Damage Assessment:	Good	Damaged	Significantly Damaged

COMMENTS: Locker RM - 01
office area - 02

CHAIN OF CUSTODY

Relinquished By: <u>[Signature]</u>	Time: <u>03-14-16</u>	Date: <u>11:30 AM</u>
Received By: _____	Time: <u>+</u>	Date: <u>+</u>
Relinquished By: _____	Time: _____	Date: _____
Received By: _____	Time: _____	Date: _____



Converse Consultants

717 Myrtle Avenue
Monrovia, CA 91016-3500
Tel.: (626) 930-1200
Fax: (626)930-1212

BULK SAMPLE LOG

Project Name: DPW/Mira Loma Temp Mod Buildings

Collected By: L. Cattaneo

Project No.: 12-41-290-09

Date: 03-11-16

HOMOGENEOUS MATERIAL: Drywall / joint compound composite

Sample Number	Location	Area Sq. Ft.	Condition
28-04	office (02) north wall, center	420	Good
28-05	Locker (01) south wall, sw corner	↓	Good
28-06	Locker (01) south wall, center.		↓

Friability:	Friable	Non-Friable	
Potential for Contact with Material:	High	Moderate	Low
Influence of Vibration:	High	Moderate	Low
Potential for Air Erosion:	High	Moderate	Low
Damage Assessment:	Good	Damaged	Significantly Damaged

COMMENTS: RM 02 NORTH wall only DRYwall / JC
RM 01 - SOUTH " " " "

2' walls DRYwall. 3 wood paneling
each side

CHAIN OF CUSTODY

Relinquished By: <u>L. Janelle</u>	Time: <u>11:30</u>	Date: <u>03-14-16</u>
Received By: <u>[Signature]</u>	Time: <u>1</u>	Date: <u>1</u>
Relinquished By: _____	Time: _____	Date: _____
Received By: _____	Time: _____	Date: _____



Converse Consultants

717 Myrtle Avenue
Monrovia, CA 91016-3500
Tel.: (626) 930-1200
Fax: (626)930-1212

BULK SAMPLE LOG

Project Name: DPW/Mira Loma Temp Mod Buildings

Collected By: L. Tanaka

Project No.: 12-41-290-09

Date: 03-11-16

HOMOGENEOUS MATERIAL:

carpet mastic (yellow-brown)

Sample Number	Location	Area Sq. Ft.	Condition
28-07	Locker room (01) entry	1360 sq	
28-08	office (02) center	↓	
28-09	office (02) entry		

Friability:	Friable	Non-Friable	
Potential for Contact with Material:	High	Moderate	Low
Influence of Vibration:	High	Moderate	Low
Potential for Air Erosion:	High	Moderate	Low
Damage Assessment:	Good	Damaged	Significantly Damaged

COMMENTS: # 28-09 gummy

CHAIN OF CUSTODY

Relinquished By: <u>L. Tanaka</u>	Time: <u>11:30</u>	Date: <u>03-14-16</u>
Received By: <u>[Signature]</u>	Time: <u>1</u>	Date: <u>+</u>
Relinquished By: _____	Time: _____	Date: _____
Received By: _____	Time: _____	Date: _____

451600910



Converse Consultants

717 Myrtle Avenue
Monrovia, CA 91016-3500
Tel.: (626) 930-1200
Fax: (626)930-1212

BULK SAMPLE LOG

Project Name: DPW/Mira Loma Temp Mod Buildings

Collected By: L. Tanaka

Project No.: 12-41-290-09

Date: 03-11-16

HOMOGENEOUS MATERIAL:

exterior texture coat (blue)

Sample Number	Location	Area Sq. Ft.	Condition
28-10	outside lockers (ol) on metal.	360	
28-11	outside offices on STAIRS (WOOD)	↓	
28-12	outside office on walkway (WOOD)		

Friability:	Friable	Non-Friable	
Potential for Contact with Material:	High	Moderate	Low
Influence of Vibration:	High	Moderate	Low
Potential for Air Erosion:	High	Moderate	Low
Damage Assessment:	Good	Damaged	Significantly Damaged

COMMENTS: WOOD & METAL SUBSTRATE

CHAIN OF CUSTODY

Relinquished By: L. Tanaka Time: 11:30 Date: 03-14-16
 Received By: [Signature] Time: L Date: L
 Relinquished By: _____ Time: _____ Date: _____
 Received By: _____ Time: _____ Date: _____



Converse Consultants

451600910

717 Myrtle Avenue
Monrovia, CA 91016-3500
Tel.: (626) 930-1200
Fax: (626)930-1212

BULK SAMPLE LOG

Project Name: DPW/Mira Loma Temp Mod Buildings

Collected By: _____

Project No.: 12-41-290-09

Date: 03-11-16

HOMOGENEOUS MATERIAL: Roof Core

Sample Number	Location	Area Sq. Ft.	Condition
28-13	Bldg. 28 Roof - N. East Side	1700 sq	Good
28-14	Bldg 28 Roof West Side	↓	↓
28-15	Bldg 28 Roof South Side	↓	↓

Friability:
 Potential for Contact with Material:
 Influence of Vibration:
 Potential for Air Erosion:
 Damage Assessment:

Friable
 High
 High
 High
 Good

Non-Friable
 Moderate
 Moderate
 Moderate
 Damaged

Low
 Low
 Low
 Significantly Damaged

COMMENTS: _____

CHAIN OF CUSTODY

Relinquished By: [Signature]
 Received By: [Signature]
 Relinquished By: _____
 Received By: _____

Time: 11:30
 Time: I
 Time: _____
 Time: _____

Date: 03-14-16
 Date: I
 Date: _____
 Date: _____



LA Testing

82 West Sierra Madre Boulevard Sierra Madre, CA 91
Tel/Fax: (626) 355-4711 / (626) 355-4497
<http://www.LATesting.com> / sierramadrelab@latesting.co

LA Testing Order: 451600911
Customer ID: 32CONV56
Customer PO:
Project ID:

Attention: Laura Tanaka
Converse Consultants
717 S Myrtle Avenue
Monrovia, CA 91016
Phone: (626) 930-1200
Fax: (626) 930-1212
Received Date: 03/14/2016 11:30 AM
Analysis Date: 03/16/2016
Collected Date: 03/11/2016
Project: 12-41-290-09 / DPW/Mira Loma Temp Mod - Building 29

Test Report: Asbestos Analysis of Bulk Materials via EPA 600/R-93/116 Method using Polarized Light Microscopy

Sample	Description	Appearance	Non-Asbestos		Asbestos
			% Fibrous	% Non-Fibrous	% Type
29-01 <small>451600911-0001</small>	2' x 4' acoustic ceiling panel - front office	Gray/White Non-Fibrous Homogeneous	40% Cellulose 10% Glass	50% Non-fibrous (Other)	None Detected
29-02 <small>451600911-0002</small>	2' x 4' acoustic ceiling panel - SW office	Gray/White Fibrous Homogeneous	40% Cellulose 10% Glass	50% Non-fibrous (Other)	None Detected
29-03 <small>451600911-0003</small>	2' x 4' acoustic ceiling panel - NW room	Gray/White Non-Fibrous Homogeneous	40% Cellulose 10% Glass	50% Non-fibrous (Other)	None Detected
29-04-Floor Tile <small>451600911-0004</small>	12" x 12" RFT/mastic - NW restroom	Gray Non-Fibrous Homogeneous		98% Non-fibrous (Other)	2% Chrysotile
29-04-Mastic <small>451600911-0004A</small>	12" x 12" RFT/mastic - NW restroom	Yellow Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
29-05-Floor Tile <small>451600911-0005</small>	12" x 12" RFT/mastic - shower room	Gray Non-Fibrous Homogeneous		98% Non-fibrous (Other)	2% Chrysotile
29-05-Mastic <small>451600911-0005A</small>	12" x 12" RFT/mastic - shower room	Yellow Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
29-06-Floor Tile <small>451600911-0006</small>	12" x 12" RFT/mastic - shower room	Tan Non-Fibrous Homogeneous		98% Non-fibrous (Other)	2% Chrysotile
29-06-Mastic <small>451600911-0006A</small>	12" x 12" RFT/mastic - shower room	Yellow Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
29-07 <small>451600911-0007</small>	Baseboard mastic - shower room	Brown Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
29-08 <small>451600911-0008</small>	Baseboard mastic - 29-06	Brown Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
29-09 <small>451600911-0009</small>	Baseboard mastic - 29-11	Brown Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
29-10 <small>451600911-0010</small>	Wallboard material - shower room	White/Beige Fibrous Homogeneous	20% Cellulose	80% Non-fibrous (Other)	None Detected
29-11 <small>451600911-0011</small>	Wallboard material - shower room	Brown/White Fibrous Homogeneous	20% Cellulose	80% Non-fibrous (Other)	None Detected
29-12 <small>451600911-0012</small>	Wallboard material - restroom	Black Non-Fibrous Homogeneous	5% Cellulose	95% Non-fibrous (Other)	None Detected
29-13 <small>451600911-0013</small>	Wallboard material - 29-12	White Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected



LA Testing

82 West Sierra Madre Boulevard Sierra Madre, CA 91
Tel/Fax: (626) 355-4711 / (626) 355-4497
<http://www.LATesting.com> / sierramadrelab@latesting.co

LA Testing Order: 451600911
Customer ID: 32CONV56
Customer PO:
Project ID:

Test Report: Asbestos Analysis of Bulk Materials via EPA 600/R-93/116 Method using Polarized Light Microscopy

Sample	Description	Appearance	Non-Asbestos		Asbestos
			% Fibrous	% Non-Fibrous	% Type
29-14 <i>451600911-0014</i>	Wallboard material - 29-12	Brown/White Fibrous Homogeneous	15% Cellulose	85% Non-fibrous (Other)	None Detected
29-15 <i>451600911-0015</i>	Wallboard material - 29-12	Tan Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
29-16 <i>451600911-0016</i>	Carpet mastic - SE office 29-06	Yellow Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
29-17 <i>451600911-0017</i>	Carpet mastic - 29-08	Yellow Non-Fibrous Homogeneous	10% Cellulose	90% Non-fibrous (Other)	None Detected
29-18 <i>451600911-0018</i>	Carpet mastic - 29-11	Yellow Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
29-19 <i>451600911-0019</i>	Roof core - roof	Black Non-Fibrous Homogeneous		95% Non-fibrous (Other)	5% Chrysotile
29-20 <i>451600911-0020</i>	Roof core - roof	Black Non-Fibrous Homogeneous		95% Non-fibrous (Other)	5% Chrysotile
29-21 <i>451600911-0021</i>	Roof core - roof	Black/Silver Non-Fibrous Homogeneous		97% Non-fibrous (Other)	3% Chrysotile
29-22 <i>451600911-0022</i>	Roof penetration mastic - roof	White/Black Non-Fibrous Homogeneous		95% Non-fibrous (Other)	5% Chrysotile
29-23 <i>451600911-0023</i>	Roof penetration mastic - roof	White/Black Non-Fibrous Homogeneous		95% Non-fibrous (Other)	5% Chrysotile
29-24 <i>451600911-0024</i>	Roof penetration mastic - roof	Black/Silver Non-Fibrous Homogeneous		95% Non-fibrous (Other)	5% Chrysotile

Analyst(s)

Nahid Motamedi (9)
Wesene Sebhat (18)

Arturo Casas Laboratory Manager
or Other Approved Signatory

EMSL maintains liability limited to cost of analysis. This report relates only to the samples reported and may not be reproduced, except in full, without written approval by EMSL. EMSL bears no responsibility for sample collection activities or analytical method limitations. Interpretation and use of test results are the responsibility of the client. This report must not be used by the client to claim product certification, approval, or endorsement by NVLAP, NIST or any agency of the federal government. Non-friable organically bound materials present a problem matrix and therefore EMSL recommends gravimetric reduction prior to analysis. Samples received in good condition unless otherwise noted. Estimated accuracy, precision and uncertainty data available upon request. Unless requested by the client, building materials manufactured with multiple layers (i.e. linoleum, wallboard, etc.) are reported as a single sample. Reporting limit is 1%

Samples analyzed by LA Testing Sierra Madre, CA NVLAP Lab Code 102116-0, CA ELAP 1269

Initial Report From: 03/16/2016 19:52:54



Asbestos Chain of Custody

EMSL Order Number (Lab Use Only):

451600911

Sierra Madre, CA 91024
PHONE: 626-355-4711
FAX: 626-355-4497

Company Name : Converse Consultants		EMSL Customer ID:	
Street: 222 East Huntington Drive Suite 211		City: Monrovia	State/Province: CA
Zip/Postal Code: 91016	Country: United States	Telephone #: 626-807-3422	Fax #: 626-930-1212
Report To (Name): Laura Tanaka		Please Provide Results: <input type="checkbox"/> Fax <input checked="" type="checkbox"/> Email	
Email Address: ltanaka@converseconsultants.com		Purchase Order: 12-41-290-09	
Project Name/Number: Mira Loma Temp Mod Bldg (29)		EMSL Project ID (Internal Use Only):	
U.S. State Samples Taken: CA		CT Samples: <input type="checkbox"/> Commercial/Taxable <input type="checkbox"/> Residential/Tax Exempt	

EMSL-Bill to: Same Different - If Bill to is Different note instructions in Comments**
Third Party Billing requires written authorization from third party

Turnaround Time (TAT) Options* - Please Check

3 Hour 6 Hour 24 Hour 48 Hour 72 Hour 96 Hour 1 Week 2 Week

*For TEM Air 3 hr through 6 hr, please call ahead to schedule. *There is a premium charge for 3 Hour TEM AHERA or EPA Level II TAT. You will be asked to sign an authorization form for this service. Analysis completed in accordance with EMSL's Terms and Conditions located in the Analytical Price Guide.

<p>PCM - Air <input type="checkbox"/> Check if samples are from NY</p> <p><input type="checkbox"/> NIOSH 7400</p> <p><input type="checkbox"/> w/ OSHA 8hr. TWA</p> <p>PLM - Bulk (reporting limit)</p> <p><input checked="" type="checkbox"/> PLM EPA 600/R-93/116 (<1%)</p> <p><input type="checkbox"/> PLM EPA NOB (<1%)</p> <p>Point Count</p> <p><input type="checkbox"/> 400 (<0.25%) <input type="checkbox"/> 1000 (<0.1%)</p> <p>Point Count w/Gravimetric</p> <p><input type="checkbox"/> 400 (<0.25%) <input type="checkbox"/> 1000 (<0.1%)</p> <p><input type="checkbox"/> NYS 198.1 (friable in NY)</p> <p><input type="checkbox"/> NYS 198.6 NOB (non-friable-NY)</p> <p><input type="checkbox"/> NYS 198.8 SOF-V</p> <p><input type="checkbox"/> NIOSH 9002 (<1%)</p>	<p>TEM - Air <input type="checkbox"/> 4-4.5hr TAT (AHERA only)</p> <p><input type="checkbox"/> AHERA 40 CFR, Part 763</p> <p><input type="checkbox"/> NIOSH 7402</p> <p><input type="checkbox"/> EPA Level II</p> <p><input type="checkbox"/> ISO 10312</p> <p>TEM - Bulk</p> <p><input type="checkbox"/> TEM EPA NOB</p> <p><input type="checkbox"/> NYS NOB 198.4 (non-friable-NY)</p> <p><input type="checkbox"/> Chatfield SOP</p> <p><input type="checkbox"/> TEM Mass Analysis-EPA 600 sec. 2.5</p> <p>TEM - Water: EPA 100.2</p> <p>Fibers >10µm <input type="checkbox"/> Waste <input type="checkbox"/> Drinking</p> <p>All Fiber Sizes <input type="checkbox"/> Waste <input type="checkbox"/> Drinking</p>	<p>TEM- Dust</p> <p><input type="checkbox"/> Microvac - ASTM D 5755</p> <p><input type="checkbox"/> Wipe - ASTM D6480</p> <p><input type="checkbox"/> Carpet Sonication (EPA 600/J-93/167)</p> <p>Soil/Rock/Vermiculite*</p> <p><input type="checkbox"/> PLM CARB 435 - A (0.25% sensitivity)</p> <p><input type="checkbox"/> PLM CARB 435 - B (0.1% sensitivity)</p> <p><input type="checkbox"/> TEM CARB 435 - B (0.1% sensitivity)</p> <p><input type="checkbox"/> TEM CARB 435 - C (0.01% sensitivity)</p> <p><input type="checkbox"/> TEM Qual. via Filtration Technique</p> <p><input type="checkbox"/> TEM Qual. via Drop-Mount Technique</p> <p><small>*Can not accept New York State Loose Fill Vermiculite Samples</small></p> <p>Other:</p> <p><input type="checkbox"/></p>
---	--	---

Check For Positive Stop - Clearly Identify Homogenous Group **Filter Pore Size (Air Samples):** 0.8µm 0.45µm

Samplers Name:

Samplers Signature:

Sample #	Sample Description	Volume/Area (Air) HA # (Bulk)	Date/Time Sampled
	SEE ATTACHED		

Client Sample # (s): -	Total # of Samples: 24
Relinquished (Client): <i>L. Tanaka</i>	Date: 03-14-16 Time: 11:30
Received (Lab): <i>Det (wi)</i>	Date: 3-14-16 Time: 11:30 AM
Comments/Special Instructions:	



Converse Consultants

717 Myrtle Avenue
Monrovia, CA 91016-3500
Tel.: (626) 930-1200
Fax: (626)930-1212

BULK SAMPLE LOG

Project Name: DPW/Mira Loma Temp Mod Buildings

Collected By: L. Cattanero

Project No.: 12-41-290-09

Date: 03-11-16

HOMOGENEOUS MATERIAL:

2'x4' Acoustic ceiling panel. (fissured w/holes)

Sample Number	Location	Area Sq. Ft.	Condition
29-01	Front office (center)	1,450	Good
29-02	Sw office (29-01) ^{RM}	↓	↓
29-03	NW Room.	↓	↓

Friability:
Potential for Contact with Material:
Influence of Vibration:
Potential for Air Erosion:
Damage Assessment:

Friable
High
High
High
Good

Non-Friable
Moderate
Moderate
Moderate
Damaged

Low
Low
Low
Significantly Damaged

COMMENTS: _____

CHAIN OF CUSTODY

Relinquished By: L. Cattanero Time: 11:30 Date: 03-14-16
 Received By: _____ Time: 1 Date: 1
 Relinquished By: _____ Time: _____ Date: _____
 Received By: _____ Time: _____ Date: _____



Converse Consultants

451600911

717 Myrtle Avenue
 Monrovia, CA 91016-3500
 Tel.: (626) 930-1200
 Fax: (626)930-1212

BULK SAMPLE LOG

Project Name: DPW/Mira Loma Temp Mod Buildings

Collected By: L. Cattaneo.

Project No.: 12-41-290-09

Date: 03-11-16

HOMOGENEOUS MATERIAL: 12" x 12" RFT yellow w/ yellow mastic

Sample Number	Location	Area Sq. Ft.	Condition
29-04	NW RESTROOM @ entry	90 #	GOOD
29-05	Shower RM @ entry	↓	GOOD
29-06	Shower RM along east wall	↓	GOOD

Friability: Friable Non-Friable
 Potential for Contact with Material: High Moderate Low
 Influence of Vibration: High Moderate Low
 Potential for Air Erosion: High Moderate Low
 Damage Assessment: Good Damaged Significantly Damaged

COMMENTS: paneled walls
carpeted floors

CHAIN OF CUSTODY

Relinquished By: [Signature] Time: 11:30 Date: 03-14-16
 Received By: [Signature] Time: 1 Date: +
 Relinquished By: _____ Time: _____ Date: _____
 Received By: _____ Time: _____ Date: _____



Converse Consultants

717 Myrtle Avenue
Monrovia, CA 91016-3500
Tel.: (626) 930-1200
Fax: (626)930-1212

BULK SAMPLE LOG

Project Name: DPW/Mira Loma Temp Mod Buildings

Collected By: L. Cattaneo

Project No.: 12-41-290-09

Date: 03-11-16

HOMOGENEOUS MATERIAL: Base Board Mastic (Brown)

Sample Number	Location	Area Sq. Ft.	Condition
29-07	Shower RM. East wall	450 LF	Good
29-08	RM 29-06 - North wall	↓	↓
29-09	RM 29-11 - North west wall	↓	↓

Friability:	Friable	Non-Friable	
Potential for Contact with Material:	High	Moderate	Low
Influence of Vibration:	High	Moderate	Low
Potential for Air Erosion:	High	Moderate	Low
Damage Assessment:	Good	Damaged	Significantly Damaged

COMMENTS: _____

CHAIN OF CUSTODY

Relinquished By: <u>J. Synalca</u>	Time: <u>11:30</u>	Date: <u>03-14-14</u>
Received By: <u>(Signature)</u>	Time: <u>1</u>	Date: <u>1</u>
Relinquished By: _____	Time: _____	Date: _____
Received By: _____	Time: _____	Date: _____

451600911



Converse Consultants

717 Myrtle Avenue
Monrovia, CA 91016-3500
Tel.: (626) 930-1200
Fax: (626)930-1212

BULK SAMPLE LOG

Project Name: DPW/Mira Loma Temp Mod Buildings

Collected By: L. Cattaneo

Project No.: 12-41-290-09

Date: 03-11-16

HOMOGENEOUS MATERIAL: wall Board material (Brown)

Sample Number	Location	Area Sq. Ft.	Condition
29-10	Shower RM (east wall)	500#	GOOD
29-11	Shower RM (south wall)	↓	↓
29-12	RR south wall	↓	↓

<i>Friability:</i>	Friable	Non-Friable	
<i>Potential for Contact with Material:</i>	High	Moderate	Low
<i>Influence of Vibration:</i>	High	Moderate	Low
<i>Potential for Air Erosion:</i>	High	Moderate	Low
<i>Damage Assessment:</i>	Good	Damaged	Significantly Damaged

COMMENTS: _____

CHAIN OF CUSTODY

Relinquished By: <u>[Signature]</u>	Time: <u>11:30</u>	Date: <u>03-14-16</u>
Received By: <u>[Signature]</u>	Time: <u>1</u>	Date: <u>1</u>
Relinquished By: _____	Time: _____	Date: _____
Received By: _____	Time: _____	Date: _____



Converse Consultants

717 Myrtle Avenue
Monrovia, CA 91016-3500
Tel.: (626) 930-1200
Fax: (626)930-1212

BULK SAMPLE LOG

Project Name: DPW/Mira Loma Temp Mod Buildings

Collected By: L. Cattanéo

Project No.: 12-41-290-09

Date: 03-11-16

HOMOGENEOUS MATERIAL: wall board material (white)

Sample Number	Location	Area Sq. Ft.	Condition
29-13	RM 29-12 north wall	250#	GOOD
29-14	RM 29-12 west wall	↓	↓
29-15	outside RM 29-12 east wall	↓	↓

Friability:	Friable	Non-Friable	
Potential for Contact with Material:	High	Moderate	Low
Influence of Vibration:	High	Moderate	Low
Potential for Air Erosion:	High	Moderate	Low
Damage Assessment:	Good	Damaged	Significantly Damaged

COMMENTS: _____

CHAIN OF CUSTODY

Relinquished By: <u>L. Cattanéo</u>	Time: <u>11:30</u>	Date: <u>03-14-16</u>
Received By: <u>(Signature)</u>	Time: <u>L</u>	Date: <u>L</u>
Relinquished By: _____	Time: _____	Date: _____
Received By: _____	Time: _____	Date: _____



Converse Consultants

717 Myrtle Avenue
Monrovia, CA 91016-3500
Tel.: (626) 930-1200
Fax: (626)930-1212

BULK SAMPLE LOG

Project Name: DPW/Mira Loma Temp Mod Buildings

Collected By: A. Rome

Project No.: 12-41-290-09

Date: 03-11-16

HOMOGENEOUS MATERIAL: carpet mastic (yellow)

Sample Number	Location	Area Sq. Ft.	Condition
29-16	SE Office (29-06) - N. East corner	1,300 #	Good
29-17	Rm 29-08 - N. West corner	↓	↓
29-18	Rm 29-11 - N. West corner	↓	↓

Friability:	Friable	Non-Friable	
Potential for Contact with Material:	High	Moderate	Low
Influence of Vibration:	High	Moderate	Low
Potential for Air Erosion:	High	Moderate	Low
Damage Assessment:	Good	Damaged	Significantly Damaged

COMMENTS: _____

CHAIN OF CUSTODY

Relinquished By: [Signature] Time: 11:30 Date: 03-14-16
 Received By: [Signature] Time: 1 Date: 1
 Relinquished By: _____ Time: _____ Date: _____
 Received By: _____ Time: _____ Date: _____

451600911



Converse Consultants

717 Myrtle Avenue
Monrovia, CA 91016-3500
Tel.: (626) 930-1200
Fax: (626)930-1212

BULK SAMPLE LOG

Project Name: DPW/Mira Loma Temp Mod Buildings

Collected By: A. Romero

Project No.: 12-41-290-09

Date: 03-11-16

HOMOGENEOUS MATERIAL: Roof Core

Sample Number	Location	Area Sq. Ft.	Condition
29-19	Bldg 29 Roof - N. East Side	1,500 #	Good
29-20	Bldg 29 Roof - East Side	↓	↓
29-21	Bldg. 29 Roof - S. West Side	↓	↓

Friability:	Friable	Non-Friable	
Potential for Contact with Material:	High	Moderate	Low
Influence of Vibration:	High	Moderate	Low
Potential for Air Erosion:	High	Moderate	Low
Damage Assessment:	Good	Damaged	Significantly Damaged

COMMENTS: _____

CHAIN OF CUSTODY

Relinquished By: [Signature] Time: 11:30 Date: 03-14-16
 Received By: [Signature] Time: 1 Date: +
 Relinquished By: _____ Time: _____ Date: _____
 Received By: _____ Time: _____ Date: _____



Converse Consultants

717 Myrtle Avenue
Monrovia, CA 91016-3500
Tel.: (626) 930-1200
Fax: (626)930-1212

BULK SAMPLE LOG

Project Name: DPW/Mira Loma Temp Mod Buildings

Collected By: A. Romero

Project No.: 12-41-290-09

Date: 03-11-16

HOMOGENEOUS MATERIAL: Roof Penetration Mastic

Sample Number	Location	Area Sq. Ft.	Condition
29.22	Bldg 29 Roof - N. West side	5 #	Good
29.23	Bldg 29 Roof - N. West side	↓	↓
29.24	Bldg 29 Roof - N. West side	↓	↓

Friability:	Friable	Non-Friable	
Potential for Contact with Material:	High	Moderate	Low
Influence of Vibration:	High	Moderate	Low
Potential for Air Erosion:	High	Moderate	Low
Damage Assessment:	Good	Damaged	Significantly Damaged

COMMENTS: _____

CHAIN OF CUSTODY

Relinquished By: <u>[Signature]</u>	Time: <u>03 11:30</u>	Date: <u>03-14-16</u>
Received By: _____	Time: <u>1</u>	Date: <u>1</u>
Relinquished By: _____	Time: _____	Date: _____
Received By: _____	Time: _____	Date: _____



LA Testing

82 West Sierra Madre Boulevard Sierra Madre, CA 91
Tel/Fax: (626) 355-4711 / (626) 355-4497
<http://www.LATesting.com> / sierramadrelab@latestesting.co

LA Testing Order: 451600915
Customer ID: 32CONV56
Customer PO:
Project ID:

Attention: Laura Tanaka
Converse Consultants
717 S Myrtle Avenue
Monrovia, CA 91016

Phone: (626) 930-1200
Fax: (626) 930-1212
Received Date: 03/14/2016 11:30 AM
Analysis Date: 03/17/2016
Collected Date: 03/11/2016

Project: 12-41-290-09 / DPW/Mira Loma Temp Mod - Building 32

Test Report: Asbestos Analysis of Bulk Materials via EPA 600/R-93/116 Method using Polarized Light Microscopy

Sample	Description	Appearance	Non-Asbestos		Asbestos
			% Fibrous	% Non-Fibrous	% Type
32-01 <small>451600915-0001</small>	2' x 4' ceiling panel - hall outside breakroom	Gray/White Non-Fibrous Homogeneous	30% Cellulose 10% Glass	60% Non-fibrous (Other)	None Detected
32-02 <small>451600915-0002</small>	2' x 4' ceiling panel - hall outside ladies room	Gray/White Non-Fibrous Homogeneous	40% Cellulose 10% Glass	50% Non-fibrous (Other)	None Detected
32-03 <small>451600915-0003</small>	2' x 4' ceiling panel - main entrance	Gray/White Non-Fibrous Homogeneous	40% Cellulose 10% Glass	50% Non-fibrous (Other)	None Detected
32-04-Sheet Flooring <small>451600915-0004</small>	Sheet flooring/mastic - hall @ east entry	Blue Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
32-04-Mastic <small>451600915-0004A</small>	Sheet flooring/mastic - hall @ east entry	Yellow Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
32-05-Sheet Flooring <small>451600915-0005</small>	Sheet flooring/mastic - main entry	Blue Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
32-05-Mastic <small>451600915-0005A</small>	Sheet flooring/mastic - main entry	Yellow Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
32-06-Sheet Flooring <small>451600915-0006 nm</small>	Sheet flooring/mastic - hall outside pill call room	Blue Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
32-06-Mastic <small>451600915-0006A</small>	Sheet flooring/mastic - hall outside pill call room	Yellow Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
32-07-Drywall <small>451600915-0007</small>	Drywall/joint compound - cashier's office	White Non-Fibrous Homogeneous	10% Cellulose	90% Non-fibrous (Other)	None Detected
32-07-Joint Compound <small>451600915-0007A</small>	Drywall/joint compound - cashier's office	White Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
32-08-Drywall <small>451600915-0008</small>	Drywall/joint compound - hall center	White Non-Fibrous Homogeneous	10% Cellulose	90% Non-fibrous (Other)	None Detected
32-08-Joint Compound <small>451600915-0008A</small>	Drywall/joint compound - hall center	White Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
32-09-Drywall <small>451600915-0009</small>	Drywall/joint compound - main entrance @ restrooms	White Non-Fibrous Homogeneous	10% Cellulose	90% Non-fibrous (Other)	None Detected
32-09-Joint Compound <small>451600915-0009A</small>	Drywall/joint compound - main entrance @ restrooms	White Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected



LA Testing

82 West Sierra Madre Boulevard Sierra Madre, CA 91
Tel/Fax: (626) 355-4711 / (626) 355-4497
<http://www.LATesting.com> / sierramadrelab@latesting.co

LA Testing Order: 451600915
Customer ID: 32CONV56
Customer PO:
Project ID:

Test Report: Asbestos Analysis of Bulk Materials via EPA 600/R-93/116 Method using Polarized Light Microscopy

Sample	Description	Appearance	Non-Asbestos		Asbestos
			% Fibrous	% Non-Fibrous	% Type
32-10 <i>451600915-0010</i>	Carpet mastic - sargeant's office	Yellow Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
32-11 <i>451600915-0011</i>	Carpet mastic - sr office-senior	Yellow Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
32-12 <i>451600915-0012</i>	Carpet mastic - office #1	Yellow Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
32-13 <i>451600915-0013</i>	Roof seam roll - roof	Black/Silver Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
32-14 <i>451600915-0014</i>	Roof seam roll - roof	Black/Silver Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
32-15 <i>451600915-0015</i>	Roof seam roll - roof	Black/Silver Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected

Analyst(s) _____
Nahid Motamedi (21)


Arturo Casas Laboratory Manager
or Other Approved Signatory

EMSL maintains liability limited to cost of analysis. This report relates only to the samples reported and may not be reproduced, except in full, without written approval by EMSL. EMSL bears no responsibility for sample collection activities or analytical method limitations. Interpretation and use of test results are the responsibility of the client. This report must not be used by the client to claim product certification, approval, or endorsement by NVLAP, NIST or any agency of the federal government. Non-friable organically bound materials present a problem matrix and therefore EMSL recommends gravimetric reduction prior to analysis. Samples received in good condition unless otherwise noted. Estimated accuracy, precision and uncertainty data available upon request. Unless requested by the client, building materials manufactured with multiple layers (i.e. linoleum, wallboard, etc.) are reported as a single sample. Reporting limit is 1%

Samples analyzed by LA Testing Sierra Madre, CA NVLAP Lab Code 102116-0, CA ELAP 1269

Initial Report From: 03/17/2016 13:25:29



Asbestos Chain of Custody

EMSL Order Number (Lab Use Only):

451600915

Sierra Madre, CA 91024
PHONE: 626-355-4711
FAX: 626-355-4497

Company Name : Converse Consultants		EMSL Customer ID:	
Street: 222 East Huntington Drive Suite 211		City: Monrovia	State/Province: CA
Zip/Postal Code: 91016	Country: United States	Telephone #: 626-807-3422	Fax #: 626-930-1212
Report To (Name): Laura Tanaka		Please Provide Results: <input type="checkbox"/> Fax <input checked="" type="checkbox"/> Email	
Email Address: ltanaka@converseconsultants.com		Purchase Order: 12-41-290-09	
Project Name/Number: Mira Loma Temp Mod Bldg (32)		EMSL Project ID (Internal Use Only):	
U.S. State Samples Taken: CA		CT Samples: <input type="checkbox"/> Commercial/Taxable <input type="checkbox"/> Residential/Tax Exempt	

EMSL-Bill to: Same Different - If Bill to is Different note instructions in Comments**
Third Party Billing requires written authorization from third party

Turnaround Time (TAT) Options* - Please Check

3 Hour 6 Hour 24 Hour 48 Hour 72 Hour 96 Hour 1 Week 2 Week

*For TEM Air 3 hr through 6 hr, please call ahead to schedule. *There is a premium charge for 3 Hour TEM AHERA or EPA Level II TAT. You will be asked to sign an authorization form for this service. Analysis completed in accordance with EMSL's Terms and Conditions located in the Analytical Price Guide.

<p>PCM - Air <input type="checkbox"/> Check if samples are from NY</p> <p><input type="checkbox"/> NIOSH 7400</p> <p><input type="checkbox"/> w/ OSHA 8hr. TWA</p> <p>PLM - Bulk (reporting limit)</p> <p><input checked="" type="checkbox"/> PLM EPA 600/R-93/116 (<1%)</p> <p><input type="checkbox"/> PLM EPA NOB (<1%)</p> <p>Point Count</p> <p><input type="checkbox"/> 400 (<0.25%) <input type="checkbox"/> 1000 (<0.1%)</p> <p>Point Count w/Gravimetric</p> <p><input type="checkbox"/> 400 (<0.25%) <input type="checkbox"/> 1000 (<0.1%)</p> <p><input type="checkbox"/> NYS 198.1 (friable in NY)</p> <p><input type="checkbox"/> NYS 198.6 NOB (non-friable-NY)</p> <p><input type="checkbox"/> NYS 198.8 SOF-V</p> <p><input type="checkbox"/> NIOSH 9002 (<1%)</p>	<p>TEM - Air <input type="checkbox"/> 4-4.5hr TAT (AHERA only)</p> <p><input type="checkbox"/> AHERA 40 CFR, Part 763</p> <p><input type="checkbox"/> NIOSH 7402</p> <p><input type="checkbox"/> EPA Level II</p> <p><input type="checkbox"/> ISO 10312</p> <p>TEM - Bulk</p> <p><input type="checkbox"/> TEM EPA NOB</p> <p><input type="checkbox"/> NYS NOB 198.4 (non-friable-NY)</p> <p><input type="checkbox"/> Chatfield SOP</p> <p><input type="checkbox"/> TEM Mass Analysis-EPA 600 sec. 2.5</p> <p>TEM - Water: EPA 100.2</p> <p>Fibers >10µm <input type="checkbox"/> Waste <input type="checkbox"/> Drinking</p> <p>All Fiber Sizes <input type="checkbox"/> Waste <input type="checkbox"/> Drinking</p>	<p>TEM- Dust</p> <p><input type="checkbox"/> Microvac - ASTM D 5755</p> <p><input type="checkbox"/> Wipe - ASTM D6480</p> <p><input type="checkbox"/> Carpet Sonication (EPA 600/J-93/167)</p> <p>Soil/Rock/Vermiculite*</p> <p><input type="checkbox"/> PLM CARB 435 - A (0.25% sensitivity)</p> <p><input type="checkbox"/> PLM CARB 435 - B (0.1% sensitivity)</p> <p><input type="checkbox"/> TEM CARB 435 - B (0.1% sensitivity)</p> <p><input type="checkbox"/> TEM CARB 435 - C (0.01% sensitivity)</p> <p><input type="checkbox"/> TEM Qual. via Filtration Technique</p> <p><input type="checkbox"/> TEM Qual. via Drop-Mount Technique</p> <p><small>*Can not accept New York State Loose Fill Vermiculite Samples</small></p> <p>Other:</p> <p><input type="checkbox"/></p>
---	--	---

Check For Positive Stop - Clearly Identify Homogenous Group **Filter Pore Size (Air Samples):** 0.8µm 0.45µm

Samplers Name: _____ **Samplers Signature:** _____

Sample #	Sample Description	Volume/Area (Air) HA # (Bulk)	Date/Time Sampled
	SEE ATTACHED		

Client Sample # (s): -	Total # of Samples: 15
Relinquished (Client): <i>L. Tanaka</i>	Date: 03-14-10 Time: 11:30
Received (Lab): <i>(Signature) (WI)</i>	Date: L Time: +
Comments/Special Instructions:	

451600915



Converse Consultants

717 Myrtle Avenue
Monrovia, CA 91016-3500
Tel.: (626) 930-1200
Fax: (626)930-1212

BULK SAMPLE LOG

Project Name: DPW/Mira Loma Temp Mod Buildings

Collected By: L. Cattaneo

Project No.: 12-41-290-09

Date: 03-11-16

HOMOGENEOUS MATERIAL: 2' x 4' Acoustic ceiling panel (fissured / holes)

Sample Number	Location	Area Sq. Ft.	Condition
32-01	Hall outside Breakroom	1,290	(Good)
32-02	Hall outside Ladies RM.	↓	↓
32-03	Main entrance.	↓	↓

Friability:
 Potential for Contact with Material:
 Influence of Vibration:
 Potential for Air Erosion:
 Damage Assessment:

Friable
 High
 High
 High
 Good

Non-Friable
 Moderate
 Moderate
 Moderate
 Damaged

Low
 Low
 Low
 Significantly Damaged

COMMENTS: _____

CHAIN OF CUSTODY

Relinquished By: [Signature]

Received By: [Signature]

Relinquished By: _____

Received By: _____

Time: 11:30

Time: +

Time: _____

Time: _____

Date: 03-14-16

Date: +

Date: _____

Date: _____



Converse Consultants

717 Myrtle Avenue
Monrovia, CA 91016-3500
Tel.: (626) 930-1200
Fax: (626)930-1212

BULK SAMPLE LOG

Project Name: DPW/Mira Loma Temp Mod Buildings

Collected By: UC

Project No.: 12-41-290-09

Date: 03-11-16

HOMOGENEOUS MATERIAL: Sheet flooring (Blue) w/ yellow mastic

Sample Number	Location	Area Sq. Ft.	Condition
32-04	Hall @ East entry	600	Good
32-05	Main entry	↓	↓
32-06	Hall outside pill call RM.	↓	↓

Friability:
Potential for Contact with Material:
Influence of Vibration:
Potential for Air Erosion:
Damage Assessment:

Friable
High
High
Good

Non-Friable
Moderate
Moderate
Damaged

Low
Low
Low
Significantly Damaged

COMMENTS: _____

CHAIN OF CUSTODY

Relinquished By: [Signature]
Received By: [Signature]
Relinquished By: _____
Received By: _____

Time: 11:30
Time: 1
Time: _____
Time: _____

Date: 03.14.16
Date: 1
Date: _____
Date: _____



Converse Consultants

717 Myrtle Avenue
Monrovia, CA 91016-3500
Tel.: (626) 930-1200
Fax: (626)930-1212

BULK SAMPLE LOG

Project Name: DPW/Mira Loma Temp Mod Buildings

Collected By: L. Cattaneo

Project No.: 12-41-290-09

Date: 03-11-16

HOMOGENEOUS MATERIAL:

Drywall / Joint Compound

Sample Number	Location	Area Sq. Ft.	Condition
32-07	cashiers office	1,050	Good
32-08	Hall center	↓	↓
32-09	Main entrance @ RR	↓	↓

Friability:	Friable	Non-Friable	
Potential for Contact with Material:	High	Moderate	Low
Influence of Vibration:	High	Moderate	Low
Potential for Air Erosion:	High	Moderate	Low
Damage Assessment:	Good	Damaged	Significantly Damaged

COMMENTS: _____

CHAIN OF CUSTODY

Relinquished By: <u>L. Jurek</u>	Time: <u>11:30</u>	Date: <u>03-14-16</u>
Received By: <u>(Signature)</u>	Time: <u>1</u>	Date: <u>1</u>
Relinquished By: _____	Time: _____	Date: _____
Received By: _____	Time: _____	Date: _____



Converse Consultants

451600915

717 Myrtle Avenue
Monrovia, CA 91016-3500
Tel.: (626) 930-1200
Fax: (626)930-1212

BULK SAMPLE LOG

Project Name: DPW/Mira Loma Temp Mod Buildings

Collected By: L. Tanaka

Project No.: 12-41-290-09

Date: 03-11-16

HOMOGENEOUS MATERIAL:

carpet mastic (yellow)

Sample Number	Location	Area Sq. Ft.	Condition
32-10	Sargeants office	690	Good
32-11	Sr office (senior)	↓	↓
32-12	office 1	↓	↓

Friability:
Potential for Contact with Material:
Influence of Vibration:
Potential for Air Erosion:
Damage Assessment:

Friable
High
High
High
Good

Non-Friable
Moderate
Moderate
Moderate
Damaged

Low
Low
Low
Significantly Damaged

COMMENTS: _____

CHAIN OF CUSTODY

Relinquished By: L. Tanaka Time: 11:30 Date: 03.14.16
 Received By: [Signature] Time: L Date: L
 Relinquished By: _____ Time: _____ Date: _____
 Received By: _____ Time: _____ Date: _____



Converse Consultants

451600915

717 Myrtle Avenue
 Monrovia, CA 91016-3500
 Tel.: (626) 930-1200
 Fax: (626)930-1212

BULK SAMPLE LOG

Project Name: DPW/Mira Loma Temp Mod Buildings

Collected By: ARomero

Project No.: 12-41-290-09

Date: 03-11-16

HOMOGENEOUS MATERIAL: Roof Seam roll

Sample Number	Location	Area Sq. Ft.	Condition
32-13	Bldg. 32 roof- west side	120#	Good
32-14	Bldg 32 roof- center	↓	↓
32-15	Bldg 32 roof- east side	↓	↓

Friability:	Friable	Non-Friable	
Potential for Contact with Material:	High	Moderate	Low
Influence of Vibration:	High	Moderate	Low
Potential for Air Erosion:	High	Moderate	Low
Damage Assessment:	Good	Damaged	Significantly Damaged

COMMENTS: _____

CHAIN OF CUSTODY

Relinquished By: <u>[Signature]</u>	Time: <u>11:30</u>	Date: <u>03-14-16</u>
Received By: <u>[Signature]</u>	Time: <u>↓</u>	Date: <u>↓</u>
Relinquished By: _____	Time: _____	Date: _____
Received By: _____	Time: _____	Date: _____



LA Testing

82 West Sierra Madre Boulevard Sierra Madre, CA 91
Tel/Fax: (626) 355-4711 / (626) 355-4497
<http://www.LATesting.com> / sierramadrelab@latestesting.co

LA Testing Order: 451600912
Customer ID: 32CONV56
Customer PO:
Project ID:

Attention: Laura Tanaka
Converse Consultants
717 S Myrtle Avenue
Monrovia, CA 91016
Phone: (626) 930-1200
Fax: (626) 930-1212
Received Date: 03/14/2016 11:30 AM
Analysis Date: 03/16/2016
Collected Date: 03/11/2016
Project: 12-41-29--09 / DPW/Mira Loma Temp Mod - Building 40

Test Report: Asbestos Analysis of Bulk Materials via EPA 600/R-93/116 Method using Polarized Light Microscopy

Sample	Description	Appearance	Non-Asbestos		Asbestos
			% Fibrous	% Non-Fibrous	% Type
40-01 <small>451600912-0001</small>	2' x 4' acoustic ceiling panel - north center	Tan/White Fibrous Homogeneous	60% Cellulose 15% Glass	10% Perlite 15% Non-fibrous (Other)	None Detected
40-02 <small>451600912-0002</small>	2' x 4' acoustic ceiling panel - center @ entry	Tan/White Fibrous Homogeneous	60% Cellulose 15% Glass	10% Perlite 15% Non-fibrous (Other)	None Detected
40-03 <small>451600912-0003</small>	2' x 4' acoustic ceiling panel - south center	Tan/White Fibrous Homogeneous	60% Cellulose 15% Glass	10% Perlite 15% Non-fibrous (Other)	None Detected
40-04-Sheet Flooring <small>451600912-0004</small>	Sheet flooring/mastic - nw wall	Brown Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
40-04-Mastic <small>451600912-0004A</small>	Sheet flooring/mastic - nw wall	Brown Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
40-05-Sheet Flooring <small>451600912-0005</small>	Sheet flooring/mastic - @ entry	Brown Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
40-05-Mastic <small>451600912-0005A</small>	Sheet flooring/mastic - @ entry	Brown Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
40-06-Sheet Flooring <small>451600912-0006</small>	Sheet flooring/mastic - se wall	Brown Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
40-06-Mastic <small>451600912-0006A</small>	Sheet flooring/mastic - se wall	Brown Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
40-07 <small>451600912-0007</small>	Roof penetration mastic - roof	Gray/Black Non-Fibrous Homogeneous		95% Non-fibrous (Other)	5% Chrysotile
40-08 <small>451600912-0008</small>	Roof penetration mastic - roof	Brown/Gray/Black Non-Fibrous Homogeneous		95% Non-fibrous (Other)	5% Chrysotile
40-09 <small>451600912-0009</small>	Roof penetration mastic - roof	Gray/Black Non-Fibrous Homogeneous		95% Non-fibrous (Other)	5% Chrysotile



LA Testing

82 West Sierra Madre Boulevard Sierra Madre, CA 91
Tel/Fax: (626) 355-4711 / (626) 355-4497
<http://www.LATesting.com> / sierramadrelab@lateesting.co

LA Testing Order: 451600912
Customer ID: 32CONV56
Customer PO:
Project ID:

Test Report: Asbestos Analysis of Bulk Materials via EPA 600/R-93/116 Method using Polarized Light Microscopy

Sample	Description	Appearance	Non-Asbestos		Asbestos
			% Fibrous	% Non-Fibrous	% Type

Analyst(s)
Guillermo Hernandez (12)


Arturo Casas Laboratory Manager
or Other Approved Signatory

EMSL maintains liability limited to cost of analysis. This report relates only to the samples reported and may not be reproduced, except in full, without written approval by EMSL. EMSL bears no responsibility for sample collection activities or analytical method limitations. Interpretation and use of test results are the responsibility of the client. This report must not be used by the client to claim product certification, approval, or endorsement by NVLAP, NIST or any agency of the federal government. Non-friable organically bound materials present a problem matrix and therefore EMSL recommends gravimetric reduction prior to analysis. Samples received in good condition unless otherwise noted. Estimated accuracy, precision and uncertainty data available upon request. Unless requested by the client, building materials manufactured with multiple layers (i.e. linoleum, wallboard, etc.) are reported as a single sample. Reporting limit is 1%
Samples analyzed by LA Testing Sierra Madre, CA NVLAP Lab Code 102116-0, CA ELAP 1269

Initial Report From: 03/17/2016 12:42:58



Asbestos Chain of Custody

EMSL Order Number (Lab Use Only):

451600912

Sierra Madre, CA 91024
PHONE: 626-355-4711
FAX: 626-355-4497

Company Name : Converse Consultants		EMSL Customer ID:	
Street: 222 East Huntington Drive Suite 211		City: Monrovia	State/Province: CA
Zip/Postal Code: 91016	Country: United States	Telephone #: 626-807-3422	Fax #: 626-930-1212
Report To (Name): Laura Tanaka		Please Provide Results: <input type="checkbox"/> Fax <input checked="" type="checkbox"/> Email	
Email Address: ltanaka@converseconsultants.com		Purchase Order: 12-41-290-09	
Project Name/Number: Mira Loma Temp Mod Bldg (40)		EMSL Project ID (Internal Use Only):	
U.S. State Samples Taken: CA		CT Samples: <input type="checkbox"/> Commercial/Taxable <input type="checkbox"/> Residential/Tax Exempt	

EMSL-Bill to: Same Different - If Bill to is Different note instructions in Comments**
Third Party Billing requires written authorization from third party

Turnaround Time (TAT) Options* - Please Check

- 3 Hour
 6 Hour
 24 Hour
 48 Hour
 72 Hour
 96 Hour
 1 Week
 2 Week

*For TEM Air 3 hr through 6 hr, please call ahead to schedule. *There is a premium charge for 3 Hour TEM AHERA or EPA Level II TAT. You will be asked to sign an authorization form for this service. Analysis completed in accordance with EMSL's Terms and Conditions located in the Analytical Price Guide.

<p>PCM - Air <input type="checkbox"/> Check if samples are from NY</p> <p><input type="checkbox"/> NIOSH 7400</p> <p><input type="checkbox"/> w/ OSHA 8hr. TWA</p> <p>PLM - Bulk (reporting limit)</p> <p><input checked="" type="checkbox"/> PLM EPA 600/R-93/116 (<1%)</p> <p><input type="checkbox"/> PLM EPA NOB (<1%)</p> <p>Point Count</p> <p><input type="checkbox"/> 400 (<0.25%) <input type="checkbox"/> 1000 (<0.1%)</p> <p>Point Count w/Gravimetric</p> <p><input type="checkbox"/> 400 (<0.25%) <input type="checkbox"/> 1000 (<0.1%)</p> <p><input type="checkbox"/> NYS 198.1 (friable in NY)</p> <p><input type="checkbox"/> NYS 198.6 NOB (non-friable-NY)</p> <p><input type="checkbox"/> NYS 198.8 SOF-V</p> <p><input type="checkbox"/> NIOSH 9002 (<1%)</p>	<p>TEM - Air <input type="checkbox"/> 4-4.5hr TAT (AHERA only)</p> <p><input type="checkbox"/> AHERA 40 CFR, Part 763</p> <p><input type="checkbox"/> NIOSH 7402</p> <p><input type="checkbox"/> EPA Level II</p> <p><input type="checkbox"/> ISO 10312</p> <p>TEM - Bulk</p> <p><input type="checkbox"/> TEM EPA NOB</p> <p><input type="checkbox"/> NYS NOB 198.4 (non-friable-NY)</p> <p><input type="checkbox"/> Chatfield SOP</p> <p><input type="checkbox"/> TEM Mass Analysis-EPA 600 sec. 2.5</p> <p>TEM - Water: EPA 100.2</p> <p>Fibers >10µm <input type="checkbox"/> Waste <input type="checkbox"/> Drinking</p> <p>All Fiber Sizes <input type="checkbox"/> Waste <input type="checkbox"/> Drinking</p>	<p>TEM- Dust</p> <p><input type="checkbox"/> Microvac - ASTM D 5755</p> <p><input type="checkbox"/> Wipe - ASTM D6480</p> <p><input type="checkbox"/> Carpet Sonication (EPA 600/J-93/167)</p> <p>Soil/Rock/Vermiculite*</p> <p><input type="checkbox"/> PLM CARB 435 - A (0.25% sensitivity)</p> <p><input type="checkbox"/> PLM CARB 435 - B (0.1% sensitivity)</p> <p><input type="checkbox"/> TEM CARB 435 - B (0.1% sensitivity)</p> <p><input type="checkbox"/> TEM CARB 435 - C (0.01% sensitivity)</p> <p><input type="checkbox"/> TEM Qual. via Filtration Technique</p> <p><input type="checkbox"/> TEM Qual. via Drop-Mount Technique</p> <p><small>*Can not accept New York State Loose Fill Vermiculite Samples</small></p> <p>Other:</p> <p><input type="checkbox"/></p>
---	--	---

Check For Positive Stop - Clearly Identify Homogenous Group Filter Pore Size (Air Samples): 0.8µm 0.45µm

Samplers Name: _____ **Samplers Signature:** _____

Sample #	Sample Description	Volume/Area (Air) HA # (Bulk)	Date/Time Sampled
	SEE ATTACHED		

Client Sample # (s): -	Total # of Samples: 9	
Relinquished (Client): <i>L. Tanaka</i>	Date: 03.14.14	Time: 11:30
Received (Lab): <i>(10) (w)</i>	Date: 3.14.14	Time: 11:30AM
Comments/Special Instructions:		



Converse Consultants

717 Myrtle Avenue
Monrovia, CA 91016-3500
Tel.: (626) 930-1200
Fax: (626)930-1212

BULK SAMPLE LOG

Project Name: DPW/Mira Loma Temp Mod Buildings

Collected By: L. Cattaneo

Project No.: 12-41-290-09

Date: 03-11-16

HOMOGENEOUS MATERIAL:

Acoustic ceiling panel (2'x4')

Sample Number	Location	Area Sq. Ft.	Condition
<u>40-01</u>	<u>North center</u>	<u>1,380</u>	<u>Good</u>
<u>40-02</u>	<u>center @ entry</u>	<u>↓</u>	<u>↓</u>
<u>40-03</u>	<u>South center</u>	<u>↓</u>	<u>↓</u>

Friability:	Friable	Non-Friable	
Potential for Contact with Material:	High	Moderate	Low
Influence of Vibration:	High	Moderate	Low
Potential for Air Erosion:	High	Moderate	Low
Damage Assessment:	Good	Damaged	Significantly Damaged

COMMENTS: _____

CHAIN OF CUSTODY

Relinquished By: <u>L. Sanafra</u>	Time: <u>11:30</u>	Date: <u>03-14-16</u>
Received By: <u>[Signature]</u>	Time: <u>1</u>	Date: <u>1</u>
Relinquished By: _____	Time: _____	Date: _____
Received By: _____	Time: _____	Date: _____



Converse Consultants

451600912

717 Myrtle Avenue
Monrovia, CA 91016-3500
Tel.: (626) 930-1200
Fax: (626)930-1212

BULK SAMPLE LOG

Project Name: DPW/Mira Loma Temp Mod Buildings

Collected By: L. Cattaneo

Project No.: 12-41-290-09

Date: 03-11-16

HOMOGENEOUS MATERIAL:

Sheet flooring (Brown) & mastic (Brown)

Sample Number	Location	Area Sq. Ft.	Condition
40-04	NW wall	1,380	Good
40-05	@ entry	↓	↓
40-06	SE wall	↓	↓

Friability:	Friable	Non-Friable	
Potential for Contact with Material:	High	Moderate	Low
Influence of Vibration:	High	Moderate	Low
Potential for Air Erosion:	High	Moderate	Low
Damage Assessment:	Good	Damaged	Significantly Damaged

COMMENTS: _____

CHAIN OF CUSTODY

Relinquished By: <u>L. Sanudo</u>	Time: <u>11:30</u>	Date: <u>03-14-16</u>
Received By: <u>[Signature]</u>	Time: <u>1</u>	Date: <u>1</u>
Relinquished By: _____	Time: _____	Date: _____
Received By: _____	Time: _____	Date: _____



Converse Consultants

451600912

717 Myrtle Avenue
Monrovia, CA 91016-3500
Tel.: (626) 930-1200
Fax: (626)930-1212

BULK SAMPLE LOG

Project Name: DPW/Mira Loma Temp Mod Buildings

Collected By: _____

Project No.: 12-41-290-09

Date: 03-11-16

HOMOGENEOUS MATERIAL: Roof Penetration Mastic

Sample Number	Location	Area Sq. Ft.	Condition
40-7	Bldg 40 Roof - East Side	104	Good
40-8	Bldg. 40 Roof - East Side	↓	
40-9	Bldg 40 Roof - East Side		

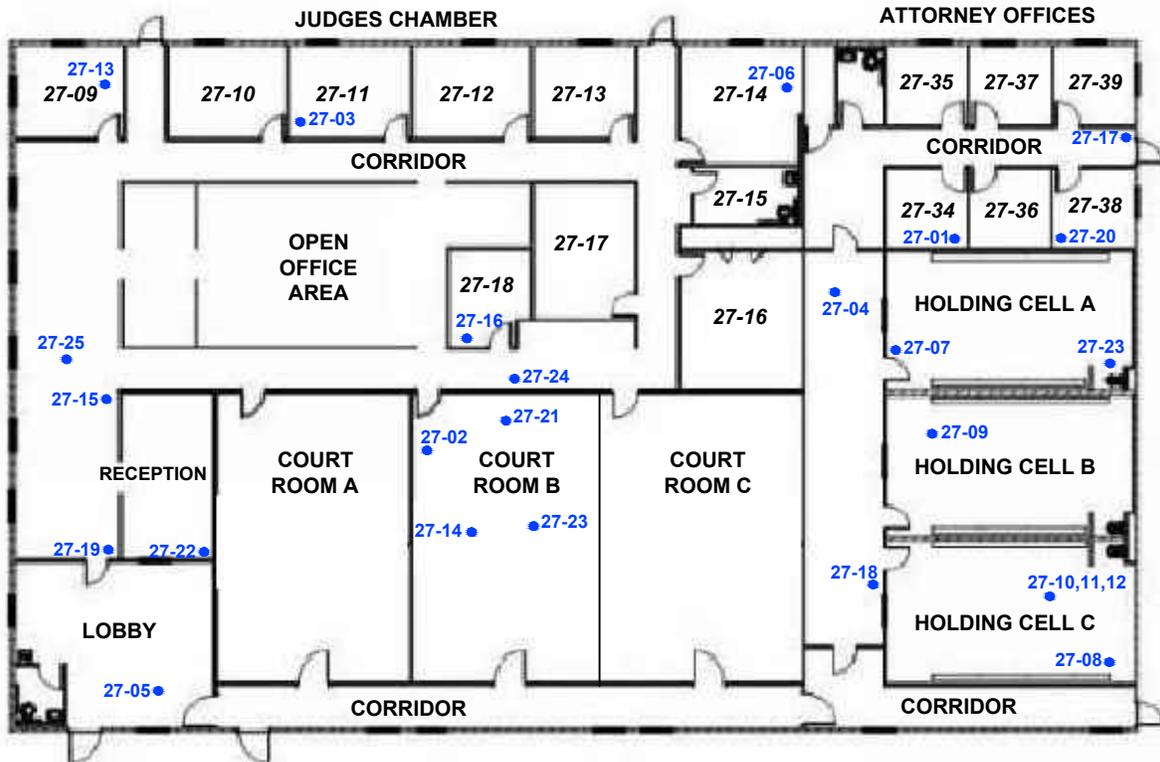
Friability:	Friable	Non-Friable	
Potential for Contact with Material:	High	Moderate	Low
Influence of Vibration:	High	Moderate	Low
Potential for Air Erosion:	High	Moderate	Low
Damage Assessment:	Good	Damaged	Significantly Damaged

COMMENTS: _____

Foam Roof over Metal Decking

CHAIN OF CUSTODY

Relinquished By: [Signature] Time: 11:30 Date: 03-14-16
 Received By: _____ Time: L Date: I
 Relinquished By: _____ Time: _____ Date: _____
 Received By: _____ Time: _____ Date: _____

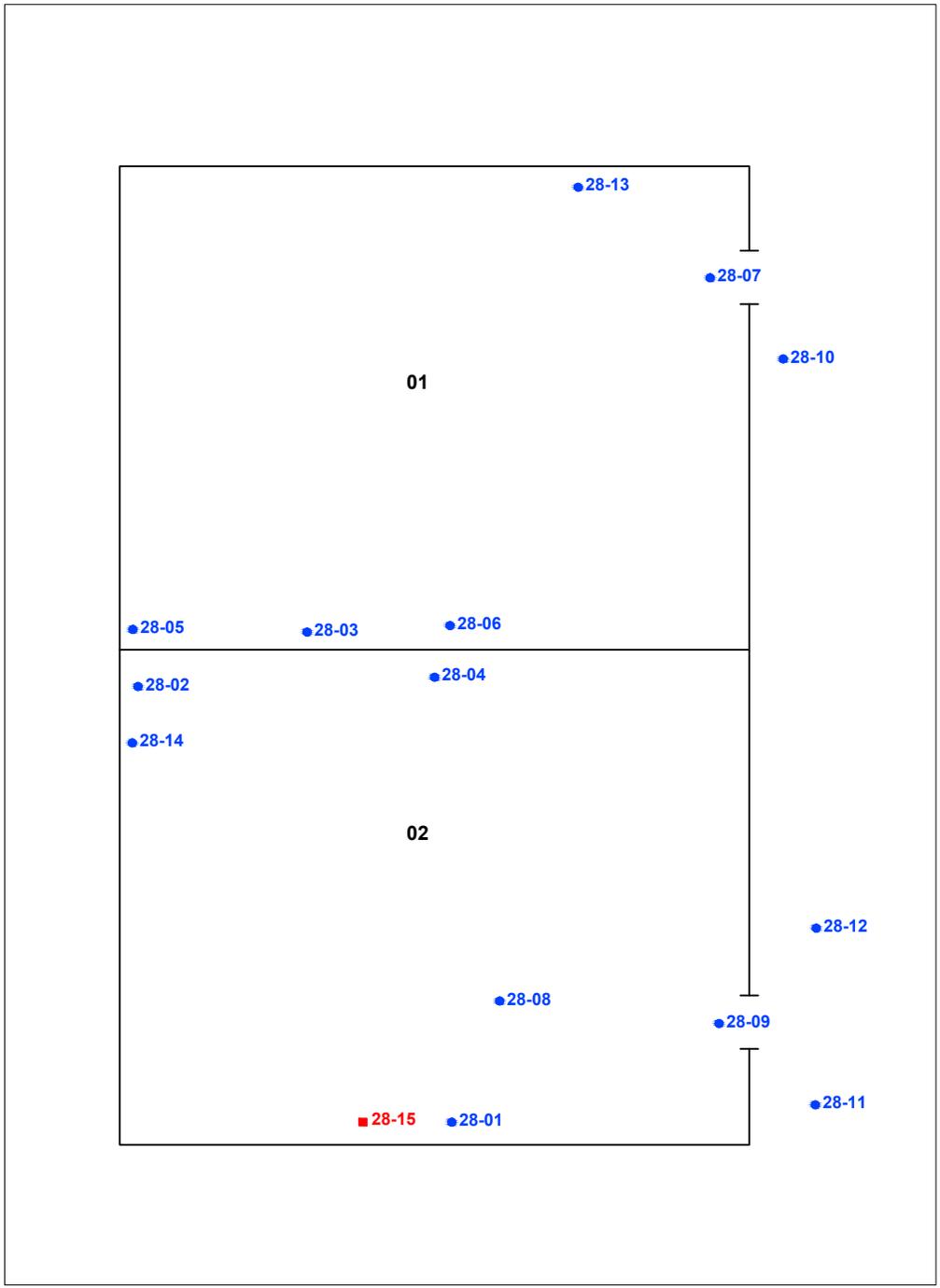


LEGEND

27-23 ● SAMPLE LOCATION; NON ACM SAMPLE

BUILDING 27 - SAMPLE LOCATION MAP





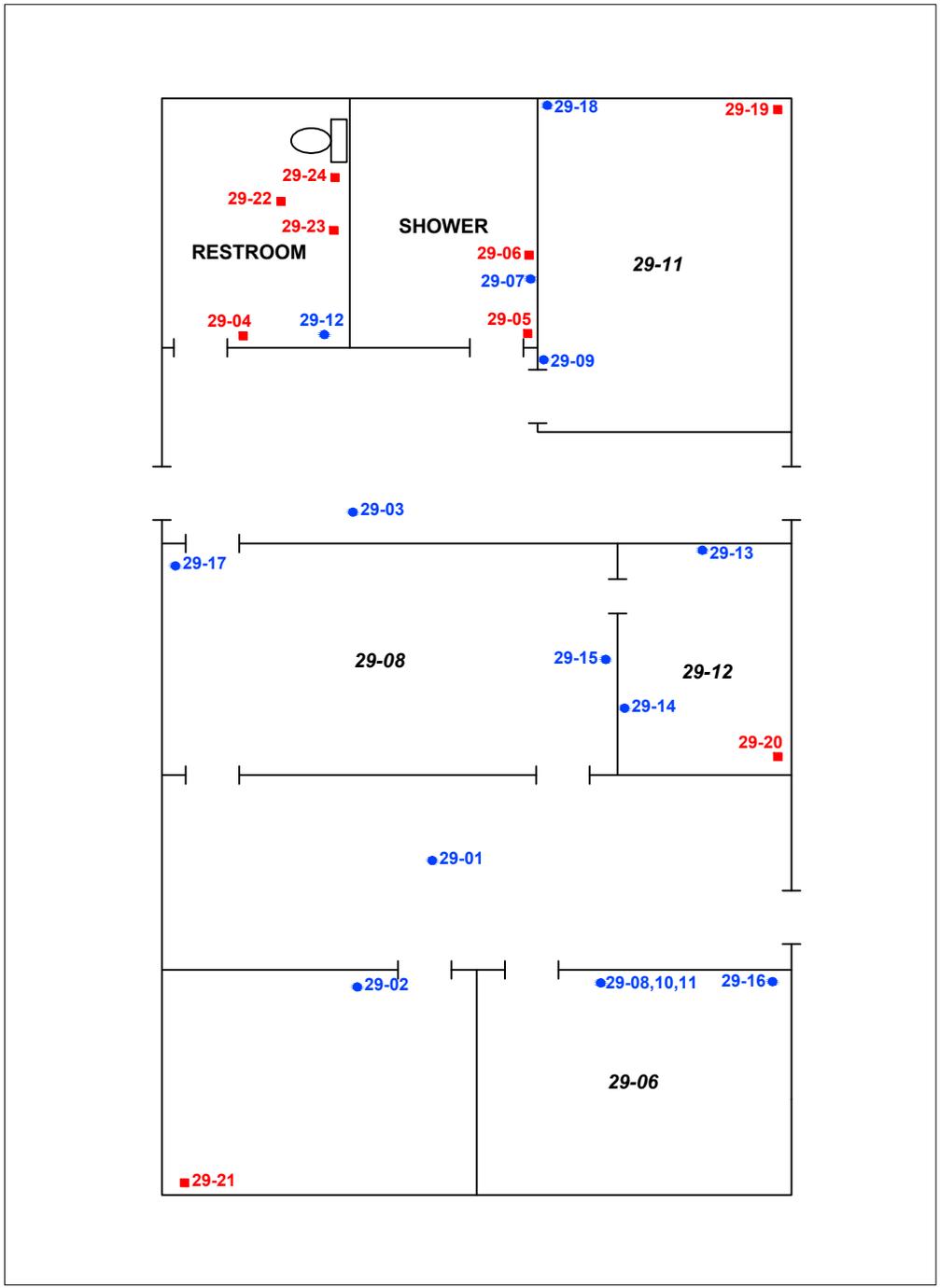
LEGEND

28-12 ● SAMPLE LOCATION; NON ACM SAMPLE

28-15 ■ SAMPLE LOCATION; ACM SAMPLE

BUILDING 28 - SAMPLE LOCATION MAP





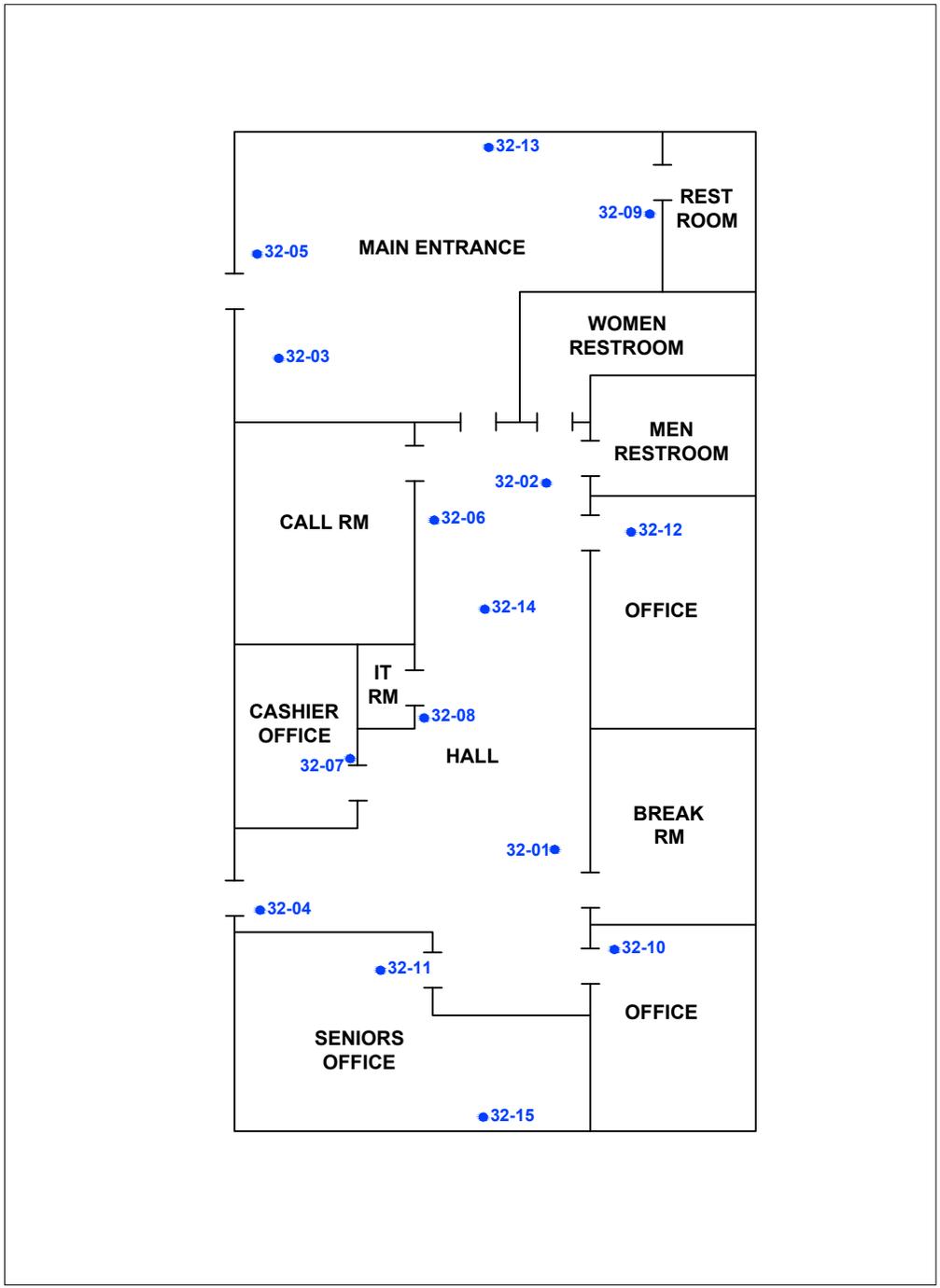
LEGEND

29-17 ● SAMPLE LOCATION; NON ACM SAMPLE

29-23 ■ SAMPLE LOCATION; ACM SAMPLE

BUILDING 29 - SAMPLE LOCATION MAP



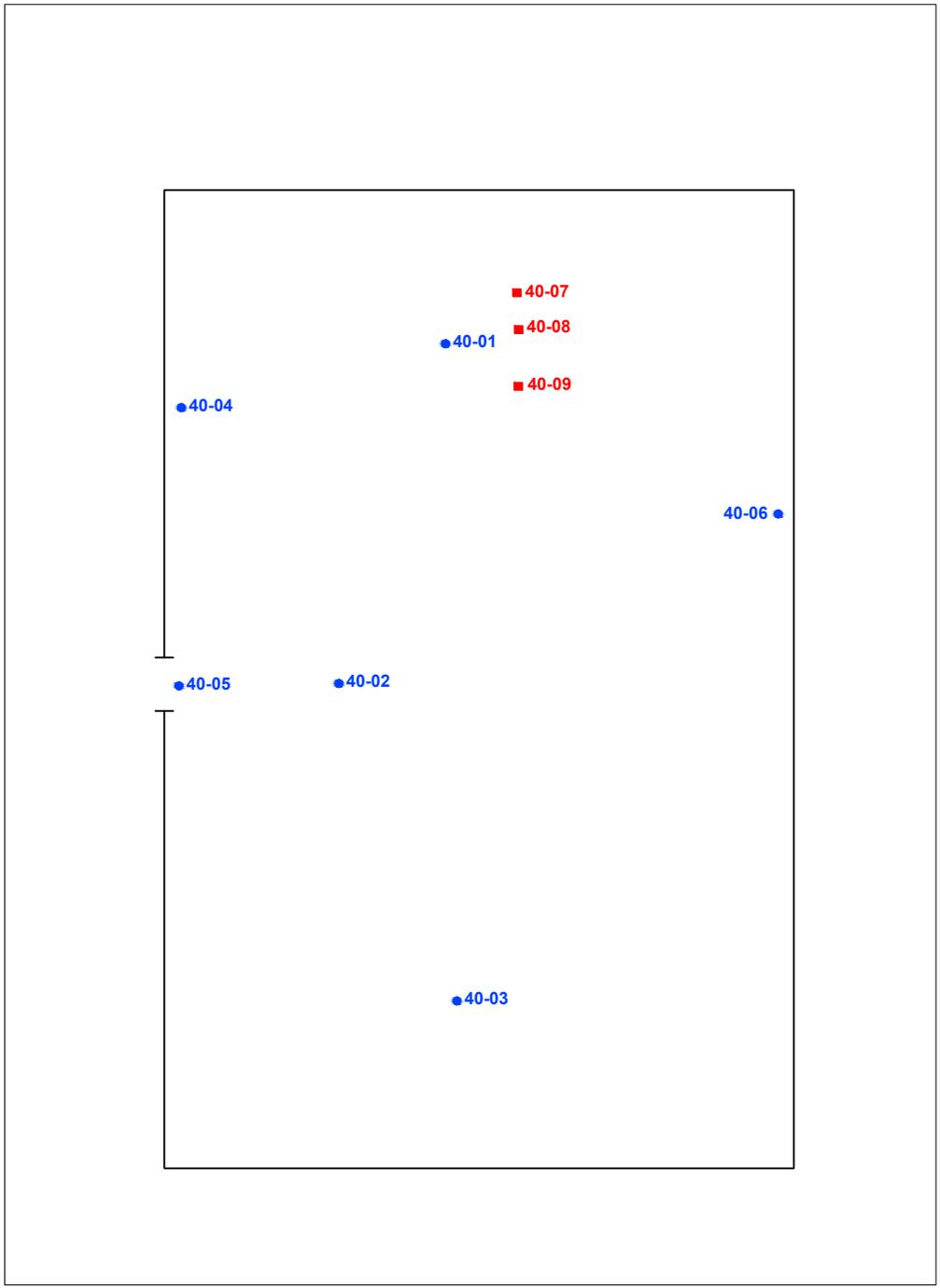


LEGEND

32-15 ● SAMPLE LOCATION; NON ACM SAMPLE

BUILDING 32 - SAMPLE LOCATION MAP





LEGEND

40-06 ● SAMPLE LOCATION; NON ACM SAMPLE

40-09 ■ SAMPLE LOCATION; ACM SAMPLE

BUILDING 40 - SAMPLE LOCATION MAP



Lead-Base Paint

XRF Logs

Lead-Base Paint



XRF SAMPLE LOG



Converse Consultants

Project Name: DPW/Mira Loma Temp Mods
 Project No.: 12-41-290-09
 Date: 03-11-16
 Sampled By: LAT

Project Address: Buildings 27, 28, 29, 32 and 40
45100 60th Street West
Lancaster, CA
 Client Contact: Alicia Ramos

3176 Pullman Avenue, Suite 108
 Costa Mesa, CA 92626
 Tel.: 714.444.9660
 Fax: 714.444.9640

Sample No.	Interior	Exterior	Paint Color	Substrate	Sample Location & Comments	Condition	Lead Conc. (mg/cm ²)	LBP	
								Yes	No
01			Calibration	Check			1.1		
02				↓			1.0		
03				↓			1.1		
04		✓	Blue	WOOD	N - WOOD RAMP RAIL	Fair	0.0		✓
05		✓	↓	↓	↓ POST	↓	0.0		✓
06		✓	↓	↓	↓ FLOOR	↓	0.0		✓
07		✓	↓	↓	≠ DOOR	intact	0.0		✓
08		✓	↓	↓	≠ DOOR Frame	"	0.0		✓
09		✓	↓	↓	≠ Wind Frame	"	0.0		✓
10		✓	✓	✓	↓ stairs	Fair	0.03		✓
11		✓	✓	✓	↓ wall - Vert strip	intact	0.0		✓
12		✓	✓	✓	" horiz strip	"	0.0		✓

Bldg. 27 → ↓

Additional Comments:

XRF SAMPLE LOG



Converse Consultants

Project Name: DPW/Mira Loma Temp Mods
 Project No.: 12-41-290-09
 Date: 03-11-16
 Sampled By: LAT

Project Address: Buildings 27, 28, 29, 32 and 40
45100 60th Street West
Lancaster, CA
 Client Contact: Alicia Ramos

3176 Pullman Avenue, Suite 108
 Costa Mesa, CA 92626
 Tel.: 714.444.9660
 Fax: 714.444.9640

Sample No.	Interior	Exterior	Paint Color	Substrate	Sample Location & Comments	Condition	Lead Conc. (mg/cm ²)	LBP	
								Yes	No
13		✓	Blue	Metal	N Door Frame	0.0	Intact		✓
14		✓	Yellow	WOOD	N WOOD RAMP POSTS	0.0			✓
15		✓	"	"	" SIDE Frame	0.0			✓
16		✓	"	"	" wall	0.0			✓
17		✓	"	"	" stop	0.0			✓
18		✓	"	"	" eave	0.0			✓
19		✓	Blue	Metal WOOD	" Parapet side	0.0			✓
20		✓	"	"	" stop	0.0			✓
21		✓	white	"	" window frame	0.0			✓
22		✓	"	Metal	" RAMP side stop	0.0			✓
23		✓	Yellow	WOOD	S - WALL	0.0			✓
24		✓	Blue	Metal	" Door	0.0	✓		✓

BUDG 27

Additional Comments:

#21 - anodized paint but took shot

XRF SAMPLE LOG



Converse Consultants

Project Name: DPW/Mira Loma Temp Mods
 Project No.: 12-41-290-09
 Date: 03-11-16
 Sampled By: LAT

Project Address: Buildings 27, 28, 29, 32 and 40
45100 60th Street West
Lancaster, CA
 Client Contact: Alicia Ramos

3176 Pullman Avenue, Suite 108
 Costa Mesa, CA 92626
 Tel.: 714.444.9660
 Fax: 714.444.9640

Bldg 27

Sample No.	Interior	Exterior	Paint Color	Substrate	Sample Location & Comments	Condition	Lead Conc. (mg/cm ²)	LBP	
								Yes	No
25		✓	Blue	WOOD	S - WALL STRIP	intact	0.0		✓
26		↓	↓	"	↓ DOOR FRAME	↓	0.0		✓
27		↓	↓	Metal	↓ DOOR FRAME	↓	0.0		✓
28		↓	↓	WOOD	↓ Wnd Frame	↓	0.0		✓
29		↓	↓	↓	RAMP RAILING	↓	0.0		✓
30		↓	↓	↓	↓ POST	↓	0.0		✓
31		↓	↓	↓	↓ FLOOR	↓	0.0		✓
32		↓	↓	↓	↓ CAUSEWAY	↓	0.0		✓
33		↓	Yellow	WOOD	↓ POST	↓	0.0		✓
34		↓	"	"	↓ SIDE BOARD	↓	0.0		✓
35		↓	Blue	Metal	immigration court sign	↓	0.0		✓
36		✓	white	"	— " —	↓	0.0		✓

Additional Comments:

XRF SAMPLE LOG



Converse Consultants

Project Name: DPW/Mira Loma Temp Mods
 Project No.: 12-41-290-09
 Date: 03-11-16
 Sampled By: LAT

Project Address: Buildings 27, 28, 29, 32 and 40
45100 60th Street West
Lancaster, CA
 Client Contact: Alicia Ramos

3176 Pullman Avenue, Suite 108
 Costa Mesa, CA 92626
 Tel.: 714.444.9660
 Fax: 714.444.9640

Sample No.	Interior	Exterior	Paint Color	Substrate	Sample Location & Comments	Condition	Lead Conc. (mg/cm ²)	LBP	
								Yes	No
37		✓	Black	Metal	Imm. Court sign post	Intact	0.0		✓
38	✓		white	Drywall	RM 27-14 N Wall		0.0		✓
39	✓		Brown	WOOD	" W Door		0.0		✓
40	✓		"	Metal	" Door Frame		0.0		✓
41	✓		white	Porc	RM 27-15 Sink		0.01		✓
42	✓		"	"	toilet		0.01		✓
43	✓		"	Drywall	RM 27-19 S wall		0.0		✓
44	✓		"	"	Open Area by 27-19 S short wall		0.0		✓
45	✓		Brown	WOOD	" wall top cover		0.0		✓
46	✓		white	Drywall	W wall outside 27-09		0.0		✓
47	✓		"	"	RM 27-10 S wall		0.0		✓
48	✓		Brown	WOOD	" " Door		0.0		✓

2 Bldgs 27

Additional Comments:

27-15 = Fiber board walls

XRF SAMPLE LOG



Converse Consultants

Project Name: DPW/Mira Loma Temp Mods
 Project No.: 12-41-290-09
 Date: 03-11-16
 Sampled By: LAT

Project Address: Buildings 27, 28, 29, 32 and 40
45100 60th Street West
Lancaster, CA
 Client Contact: Alicia Ramos

3176 Pullman Avenue, Suite 108
 Costa Mesa, CA 92626
 Tel.: 714.444.9660
 Fax: 714.444.9640

BLDG 27

Sample No.	Interior	Exterior	Paint Color	Substrate	Sample Location & Comments	Condition	Lead Conc. (mg/cm ²)	LBP	
								Yes	No
49	✓		Brown	Metal	RM 27-10 @ Door Frame	Intact	0.0		✓
50	✓		White	Porc	RM 27-07 Sink	↓	0.01		✓
51	✓		"	"	" Toilet		0.01		✓
52	✓		Brown	WOOD	wall strip in RM adg TO 27-07		0.0		✓
53	✓		White	Drywall	@ WALL - corridor outside court rooms		0.0		✓
54	✓		"	"	Court A @ wall		0.0		✓
55	✓		Brown	WOOD	↓ ↓ Door		0.0		✓
56	✓		"	Metal	↓ ↓ Door Frame		0.0		✓
57	✓		"	WOOD	↓ ↓ Room Pinding railing		0.0		✓
58	✓		Blue	Drywall	↓ N WALL		0.0		✓
59	✓		"	"	Court C N wall		0.0		✓
60	✓		Brown	WOOD	" N Door	0.0		✓	

Additional Comments:

XRF SAMPLE LOG



Converse Consultants

Project Name: DPW/Mira Loma Temp Mods
 Project No.: 12-41-290-09
 Date: 03-11-16
 Sampled By: LAT

Project Address: Buildings 27, 28, 29, 32 and 40
45100 60th Street West
Lancaster, CA
 Client Contact: Alicia Ramos

3176 Pullman Avenue, Suite 108
 Costa Mesa, CA 92626
 Tel.: 714.444.9660
 Fax: 714.444.9640

Bldg 27

Sample No.	Interior	Exterior	Paint Color	Substrate	Sample Location & Comments	Condition	Lead Conc. (mg/cm ²)	LBP	
								Yes	No
61	✓		Brown	Metal	Court C N Door Frame	Intact	0.01		✓
62	✓		White	Drywall	" W Wall	↓	0.0		✓
63	✓		Brown	WOOD	" Room Dividing Walling		0.0		✓
64	✓		White	Drywall	Corridor by Hold cells S wall		0.0		✓
65	✓		Brown	Metal	Hold cell 28 W Door		0.0		✓
66	✓		↓	↓	↓ Door Frame		0.01		✓
67	✓		↓	↓	↓ Window Frame		0.0		✓
68	✓		"	"	↓ Bench		0.0		✓
69	✓		Tan	Metal	↓ Wall (N)		0.0		✓
70	✓		White	Drywall	Wall b/w Hold cells		0.0		✓
71	✓		↓	Porc	RM 27-33 Sink		0.01		✓
72	✓		↓	↓	" Toilet		0.01		✓

Additional Comments:

XRF SAMPLE LOG



Converse Consultants

Project Name: DPW/Mira Loma Temp Mods
 Project No.: 12-41-290-09
 Date: 03-11-16
 Sampled By: LAT

Project Address: Buildings 27, 28, 29, 32 and 40
45100 60th Street West
Lancaster, CA
 Client Contact: Alicia Ramos

3176 Pullman Avenue, Suite 108
 Costa Mesa, CA 92626
 Tel.: 714.444.9660
 Fax: 714.444.9640

BUDA 27

Sample No.	Interior	Exterior	Paint Color	Substrate	Sample Location & Comments	Condition	Lead Conc. (mg/cm ²)	LBP	
								Yes	No
73	✓		white	drywall	RM 27-32 E wall	intact	0.0		✓
74	✓		Beige	Metal	RM 27-36 HS viewing wind frame		0.0		✓
75	✓		"	"	" HS viewing window		0.0		✓
76	✓		white	drywall	" HS wall		0.0		✓
77	✓		Beige	WOOD	" S Desk/table frame		0.0		✓
78	✓		Brown	Metal	" N Door		0.0		✓
79	✓		"	"	" N Door Frame		0.0		✓
80	✓		white	drywall	RM 27-39 E wall		0.00		✓
81	✓		creme	Metal	" " wind frame		0.00		✓
82	✓		Brown	Metal	" S Door		0.00		✓
83	✓		"	"	" " Door Frame		0.00		✓
84	✓		"	"	door at end of corridor by 27-39	✓	0.00		✓

Additional Comments:

XRF SAMPLE LOG



Converse Consultants

Project Name: DPW/Mira Loma Temp Mods
 Project No.: 12-41-290-09
 Date: 03-11-16
 Sampled By: LAT

Project Address: Buildings 27, 28, 29, 32 and 40
45100 60th Street West
Lancaster, CA
 Client Contact: Alicia Ramos

3176 Pullman Avenue, Suite 108
 Costa Mesa, CA 92626
 Tel.: 714.444.9660
 Fax: 714.444.9640

BUG. 20 →

Sample No.	Interior	Exterior	Paint Color	Substrate	Sample Location & Comments	Condition	Lead Conc. (mg/cm ²)	LBP	
								Yes	No
97		✓	lt yellow	WOOD	E wall	intact	0.0		✓
98		✓	↓	↓	wall side board	↓	0.0		✓
99		✓	↓	↓	PIPE		0.0		✓
100		✓	Blue	↓	Door		0.08		✓
101		✓	↓	↓	Door Frame		0.0		✓
102		✓	↓	Metal	Floor		0.0		✓
103		✓	↓	↓	stair		0.0		✓
104		✓	"	"	stair Rail		0.0		✓
105		✓	"	WOOD	stair rail		0.0		✓
106		✓	"	"	Floor		0.02		✓
107		✓	lt yellow	"	"		stair posts	0.0	
108		✓	Blue	WOOD	"	wall board at roof line	0.0		✓

Additional Comments:

XRF SAMPLE LOG



Converse Consultants

Project Name: DPW/Mira Loma Temp Mods
 Project No.: 12-41-290-09
 Date: 03-11-16
 Sampled By: LAT

Project Address: Buildings 27, 28, 29, 32 and 40
45100 60th Street West
Lancaster, CA
 Client Contact: Alicia Ramos

3176 Pullman Avenue, Suite 108
 Costa Mesa, CA 92626
 Tel.: 714.444.9660
 Fax: 714.444.9640

BLDG 28 →
 ↑
 BLDG 29 ←

Sample No.	Interior	Exterior	Paint Color	Substrate	Sample Location & Comments	Condition	Lead Conc. (mg/cm ²)	LBP	
								Yes	No
109		✓	lt yellow	WOOD	S wall board (reert)	intact	0.0		✓
110		✓	↓	↓	W wnd frame	↓	0.0		✓
111		✓	↓	↓	wall		0.0		✓
112	✓		white	drywall	RM 28-02 N wall		0.0		✓
113	✓		"	"	RM 28-01 S wall		0.0		✓
114	✓		Beige	WOOD	" Benches		0.0		✓
115			calibration check				1.0		
116				↓			0.9		
117				↓			1.2		
118	✓		white	Porc	Restroom sink	intact	37.9	✓	
119	✓		"	"	" toilet	↓	0.01		✓
120	✓		"	"	Shower sink	↓	27.8	✓	

Additional Comments:

XRF SAMPLE LOG



Converse Consultants

Project Name: DPW/Mira Loma Temp Mods
 Project No.: 12-41-290-09
 Date: 03-11-16
 Sampled By: LAT

Project Address: Buildings 27, 28, 29, 32 and 40
45100 60th Street West
Lancaster, CA
 Client Contact: Alicia Ramos

3176 Pullman Avenue, Suite 108
 Costa Mesa, CA 92626
 Tel.: 714.444.9660
 Fax: 714.444.9640

BUDG 29 ←

Sample No.	Interior	Exterior	Paint Color	Substrate	Sample Location & Comments	Condition	Lead Conc. (mg/cm ²)	LBP	
								Yes	No
121	✓		Brown	WOOD	RM -02 S OFFICE - DOOR	intact	0.00		✓
122	✓		"	Metal	" " DOOR Frame		0.01		✓
123	✓		"	WOOD	RM 29-09 DOOR		0.00		✓
124	✓		"	Metal	" DOOR Frame		0.01		✓
125		✓	Blue	Metal	E DOOR		0.09		✓
126		✓	↓	WOOD	↓ DOOR Frame		0.00		✓
127		✓	↓	"	↓ - Wind Frame		0.00		✓
128		✓	↓	Metal	↓ Stair Riser		0.00		✓
129		✓	↑ yellow	WOOD	↓ Wall		0.00		✓
130		✓	↓	"	↓ wall board (WALL Along)		0.01		✓
131		✓	↓	Metal	↓ Floor to stairs		0.01		✓
132		✓	Gray	"	↓ Stair		0.00		✓

Additional Comments:

#121 = RM 29-06

XRF SAMPLE LOG



Converse Consultants

Project Name: DPW/Mira Loma Temp Mods
 Project No.: 12-41-290-09
 Date: 03-11-16
 Sampled By: LAT

Project Address: Buildings 27, 28, 29, 32 and 40
45100 60th Street West
Lancaster, CA
 Client Contact: Alicia Ramos

3176 Pullman Avenue, Suite 108
 Costa Mesa, CA 92626
 Tel.: 714.444.9660
 Fax: 714.444.9640

Sample No.	Interior	Exterior	Paint Color	Substrate	Sample Location & Comments	Condition	Lead Conc. (mg/cm ²)	LBP	
								Yes	No
133		✓	lt yellow	metal	S utility box	Intact	0.05		✓
134		✓		↓	↓ HVAC Box		0.00		✓
135		✓	↓	↓	↓ PIPES		0.02		✓
136		✓	"	WOOD	" wall		0.00		✓
137		✓	"	"	W Door Frame		0.07		✓
138		✓	"	Metal	" Door		0.00		✓
139		✓	Black	"	" Stair Floor		0.00		✓
140		✓	"	"	Stair rail		0.00		✓
141		✓	Blue	Metal	N Door		0.00		✓
142		✓	"	"	" Door Frame		0.00		✓
143		✓	lt yellow	WOOD	" wall		0.00		✓
144		✓	"	"	" wall board (horizontal)	✓	0.00		✓

↑ BLDG 29
 ↓ BLDG 40

Additional Comments:

XRF SAMPLE LOG



Converse Consultants

Project Name: DPW/Mira Loma Temp Mods
 Project No.: 12-41-290-09
 Date: 03-11-16
 Sampled By: LAT

Project Address: Buildings 27, 28, 29, 32 and 40
45100 60th Street West
Lancaster, CA
 Client Contact: Alicia Ramos

3176 Pullman Avenue, Suite 108
 Costa Mesa, CA 92626
 Tel.: 714.444.9660
 Fax: 714.444.9640

Sample No.	Interior	Exterior	Paint Color	Substrate	Sample Location & Comments	Condition	Lead Conc. (mg/cm ²)	LBP	
								Yes	No
145		✓	lt yellow	metal	W wall	intact	0.20		✓
146		✓	"	"	" wall board (horiz)	↓	0.00		✓
147		✓	"	"	S wall dnp piece (rect)		0.00		✓
148		✓	"	"	E trailer hitch (S)		0.08		✓
149		✓	"	"	" " " (N)		0.02		✓
150		✓	Blue	WOOD	E Door Frame		0.00		✓
151		↓	"	Metal	↓ Door		0.00		✓
152		↓	"	WOOD	↓ wind Frame		0.00		✓
153		↓	"	"	↓ wall strip (horiz)		0.00		✓
154		↓	lt yellow	WOOD	↓ wall		0.00		✓
155		↓	↓	Metal	↓ window gate		0.00		✓
156		↓	↓	↓	S Utility Box	✓	0.01		✓

BUDG. 40 →
 BUDG. 32 →
 BUDG. 27 →

Additional Comments:

XRF SAMPLE LOG



Converse Consultants

Project Name: DPW/Mira Loma Temp Mods
 Project No.: 12-41-290-09
 Date: 03-11-16
 Sampled By: LAT

Project Address: Buildings 27, 28, 29, 32 and 40
45100 60th Street West
Lancaster, CA
 Client Contact: Alicia Ramos

3176 Pullman Avenue, Suite 108
 Costa Mesa, CA 92626
 Tel.: 714.444.9660
 Fax: 714.444.9640

32 →
 ← BLDG 32 →
 32
 ↑

Sample No.	Interior	Exterior	Paint Color	Substrate	Sample Location & Comments	Condition	Lead Conc. (mg/cm ²)	LBP	
								Yes	No
157		✓	lt yellow	metal	S Pipes	Intact	0.01		✓
158		✓	"	"	" HVAC Box	↓	0.02		✓
159		✓	"	WOOD	E wall		0.00		✓
160	✓		white	Porc	N end Bathroom Sink		0.05		✓
161			"	"	" Toilet		0.01		✓
162			Grey	Drywall	" E wall		0.00		✓
163			Brown	WOOD	" Door		0.00		✓
164			"	Metal	" Door Frame		0.00		✓
165			Grey	Drywall	N end office - wall		0.00		✓
166			White	Porc	Mens RR Toilet	0.01		✓	
167			↓	↓	" Sink	0.00		✓	
168	✓		↓	↓	Women RR Toilet	0.01		✓	

Additional Comments:

XRF SAMPLE LOG



Converse Consultants

Project Name: DPW/Mira Loma Temp Mods
 Project No.: 12-41-290-09
 Date: 03-11-16
 Sampled By: LAT

Project Address: Buildings 27, 28, 29, 32 and 40
45100 60th Street West
Lancaster, CA
 Client Contact: Alicia Ramos

3176 Pullman Avenue, Suite 108
 Costa Mesa, CA 92626
 Tel.: 714.444.9660
 Fax: 714.444.9640

BUDG 32 →

Sample No.	Interior	Exterior	Paint Color	Substrate	Sample Location & Comments	Condition	Lead Conc. (mg/cm ²)	LBP	
								Yes	No
169	✓		White	Porc	Womens RR sink	Intact	0.00		✓
170	✓		"	Metal	Break RM Door	↓	0.00		✓
171	✓		"	"	" Door Frame		0.00		✓
172	✓		Brown	WOOD	Break RM Door		0.00		✓
173	✓		"	"	Pill case RM Door		0.00		✓
174	✓		off white	metal	OFFICE W Door		0.00		✓
175	✓		"	metal	" " Door Frame	↓	0.00		✓
176			calibration		check		1.0		
177							1.1		
178							1.2		
179									
180									

Additional Comments:

Appendix E

California Environmental Reporting System (CERS) Database and Monitoring System Certification

CERS Business Home Submittals Facilities Compliance My Business

Compliance: MIRA LOMA DETENTION FACILITY
[Home](#) » [Compliance](#)

- [Compliance](#)
- [Inspections](#)
- [Violations](#)
- [Enforcements](#)

Compliance Activity for All Facilities

Inspections for All Facilities (10 most recent)

CERS ID	Facility Name	Occurred On	Program	Type	# Vios	RTC Date	Status
10288789	LA CO SHERIFFS DEPT. - MIRA LOMA DETENTION FACILITY	7/22/2015	UST	Routine	0		Approved

[Export To Excel](#)

Violations for All Facilities (10 most recent)

CERS ID	Facility	Program	Vio Type	Violation Date	Actual RTC	Class
(No violations listed)						

[Export To Excel](#)

Enforcements for All Facilities (10 most recent)

CERS ID	Facility Name	Occurred On	Type	Formal Type	# Vios
(No enforcements listed)					

[Export To Excel](#)

MONITORING SYSTEM CERTIFICATION

For Use By All Jurisdictions Within the State of California

Authority Cited: Chapter 6.7, Health and Safety Code; Chapter 16, Division 3, Title 23, California Code of Regulations

This form must be used to document testing and servicing of monitoring equipment. A separate certification or report must be prepared for each monitoring system control panel by the technician who performs the work. A Copy of this form must be provided to the tank system owner/operator. The owner/operator must submit a copy of this form to the local agency regulating UST systems within 30 days of test date.

General Information

Facility Name:	LA Cnty Sheriff - Mira Loma Det. Center	Bldg. No:	Gas Station
Site Address:	45100 60th St West	Contact:	Norm Martin
City / State / Zip:	Lancaster, CA	Phone:	323-568-4736 Fax:
Date Local Agency Was Notified of Testing:	7/13/2015		
Name of Local Agency Inspector (if present during testing):	LACDPW -MBAREK KHALIFA		
Make/Model of Monitoring System:	Veeder Root TLS-350		Date of Testing / Servicing:
			7/22/2015

B. Inventory of Equipment Test/Certified

Check the appropriate boxes to indicate specific equipment inspected/serviced:

Gas	Diesel
<input checked="" type="checkbox"/> In-Tank Gauging Probe. Model: Mag Probe	<input checked="" type="checkbox"/> In-Tank Gauging Probe. Model: Mag Probe
<input checked="" type="checkbox"/> Annular Space or Vault Sensor. Model: VR#420	<input checked="" type="checkbox"/> Annular Space or Vault Sensor. Model: VR#420
<input checked="" type="checkbox"/> Piping Sump / Trench Sensor(s). Model: VR#208	<input checked="" type="checkbox"/> Piping Sump / Trench Sensor(s). Model: VR#208
<input checked="" type="checkbox"/> Fill Sump Sensor(s). Model: VR#208	<input checked="" type="checkbox"/> Fill Sump Sensor(s). Model: VR#208
<input type="checkbox"/> Mechanical Line Leak Detector. Model:	<input type="checkbox"/> Mechanical Line Leak Detector. Model:
<input type="checkbox"/> Electronic Line Leak Detector. Model:	<input type="checkbox"/> Electronic Line Leak Detector. Model:
<input checked="" type="checkbox"/> Tank Overfill / High Level Sensor. Model: Mag Probe	<input checked="" type="checkbox"/> Tank Overfill / High Level Sensor. Model: Mag Probe
<input type="checkbox"/> Other (specify equipment type and model in Section E on Page 2)	<input type="checkbox"/> Other (specify equipment type and model in Section E on Page 2)

Tank ID: <input type="checkbox"/> In-Tank Gauging Probe. Model: <input type="checkbox"/> Annular Space or Vault Sensor. Model: <input type="checkbox"/> Piping Sump / Trench Sensor(s). Model: <input type="checkbox"/> Fill Sump Sensor(s). Model: <input type="checkbox"/> Mechanical Line Leak Detector. Model: <input type="checkbox"/> Electronic Line Leak Detector. Model: <input type="checkbox"/> Tank Overfill / High Level Sensor. Model: <input type="checkbox"/> Other (specify equipment type and model in Section E on Page 2)	Tank ID: <input type="checkbox"/> In-Tank Gauging Probe. Model: <input type="checkbox"/> Annular Space or Vault Sensor. Model: <input type="checkbox"/> Piping Sump / Trench Sensor(s). Model: <input type="checkbox"/> Fill Sump Sensor(s). Model: <input type="checkbox"/> Mechanical Line Leak Detector. Model: <input type="checkbox"/> Electronic Line Leak Detector. Model: <input type="checkbox"/> Tank Overfill / High Level Sensor. Model: <input type="checkbox"/> Other (specify equipment type and model in Section E on Page 2)
--	--

Dispenser ID: 1 <input checked="" type="checkbox"/> Dispenser Containment Sensor(s). Model: VR#208 <input checked="" type="checkbox"/> Shear Valve(s). <input type="checkbox"/> Dispenser Containment Float(s) and Chain(s).	Dispenser ID: 2 <input checked="" type="checkbox"/> Dispenser Containment Sensor(s). Model: VR#208 <input checked="" type="checkbox"/> Shear Valve(s). <input type="checkbox"/> Dispenser Containment Float(s) and Chain(s).
--	--

Dispenser ID: <input type="checkbox"/> Dispenser Containment Sensor(s). Model: <input type="checkbox"/> Shear Valve(s). <input type="checkbox"/> Dispenser Containment Float(s) and Chain(s).	Dispenser ID: <input type="checkbox"/> Dispenser Containment Sensor(s). Model: <input type="checkbox"/> Shear Valve(s). <input type="checkbox"/> Dispenser Containment Float(s) and Chain(s).
---	---

Dispenser ID: <input type="checkbox"/> Dispenser Containment Sensor(s). Model: <input type="checkbox"/> Shear Valve(s). <input type="checkbox"/> Dispenser Containment Float(s) and Chain(s).	Dispenser ID: <input type="checkbox"/> Dispenser Containment Sensor(s). Model: <input type="checkbox"/> Shear Valve(s). <input type="checkbox"/> Dispenser Containment Float(s) and Chain(s).
---	---

* If the facility contains more tanks or dispensers, copy this form. Include information for every tank and dispenser at the facility.

C. Certification - I certify that the equipment identified in this document was inspected/serviced in accordance with the manufacturers' guidelines. Attached to this Certification is information (e.g. manufacturers' checklists) necessary to verify that this information is correct and a Plot Plan showing the layout of monitoring equipment. For any equipment capable of generating such reports, I have also attached a copy of the report.

(check all that apply):

System set-up

Alarm History Report

Technician Name (print):

William Coulter

Signature:

Certification No.:

A22373

License No.:

935423

Testing Company Name:

AW Associates, Inc.

Facility Address:

P.O. Box 2903
Corona, CA 92878

Date of Testing / Servicing: 7/22/2015



Spill Bucket Testing Report Form

This form is intended for use by contractors performing annual testing of UST spill containment structures. The completed form and printouts from tests (if applicable), should be provided to the facility owner / operator for submittal to the local regulatory agency.

1. FACILITY INFORMATION

Facility Name: LA Cnty Sheriff - Mira Loma Det. Center	Testing Date: 7/22/2015
Facility Address: 45100 60th St West	City / State / Zip: Lancaster, CA
Facility Contact: Norm Martin	Ph: 323-568-4736 Fax: -
Date Local Agency Was Notified of Testing: 7/13/2015	
Name of Local Agency Inspector (if present during testing): LACDPW -MBAREK KHALIFA	

2. TESTING CONTRACTOR INFORMATION

Company Name: AW Associates, Inc.		
Technician Conducting Test: William Coulter		
Credentials (choose 1): <input checked="" type="checkbox"/> CSLB Contractor	<input type="checkbox"/> ICC Service Tech.	<input type="checkbox"/> SWRCB Tank Tester
License Number(s):		935423

3. SPILL BUCKET TESTING INFORMATION

Test Method Used: <input checked="" type="checkbox"/> Hydrostatic	<input type="checkbox"/> Vacuum	<input type="checkbox"/> Other
Test Equipment Used: visual	Equipment Resolution:	

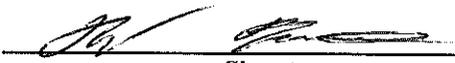
Identify Spill Bucket (by Tank Number, Store Product, etc.)	1 Gas Fill	2 Gas Vapor	3 Dsl	4	5
Bucket Installation Type:	<input checked="" type="checkbox"/> Direct Bury <input type="checkbox"/> In Sump	<input type="checkbox"/> Direct Bury <input checked="" type="checkbox"/> In Sump	<input checked="" type="checkbox"/> Direct Bury <input type="checkbox"/> In Sump	<input type="checkbox"/> Direct Bury <input type="checkbox"/> In Sump	<input type="checkbox"/> Direct Bury <input type="checkbox"/> In Sump
Bucket Diameter:	13"	13"	13"		
Bucket Depth:	14"	14"	12"		
Wait time between applying vacuum/water and start of test:	15 min	15 min	15 min		
Test Start Time (T _I):	1:45 PM	1:45 PM	1:45 PM		
Initial Reading (R _I):	13"	13"	11"		
Test End Time (T _F):	2:45 PM	2:45 PM	2:45 PM		
Final Reading (R _F):	13"	13"	11"		
Test Duration (T _F - T _I):	1 Hour	1 Hour	1 Hour		
Change in Reading (R _F -R _I):	0.0000"	0.0000"	0.0000"		
Pass/Fail Threshold or Criteria:	0.0020"	0.0020"	0.0020"		
Test Result:	<input checked="" type="checkbox"/> Pass <input type="checkbox"/> Fail	<input checked="" type="checkbox"/> Pass <input type="checkbox"/> Fail	<input checked="" type="checkbox"/> Pass <input type="checkbox"/> Fail	<input type="checkbox"/> Pass <input type="checkbox"/> Fail	<input type="checkbox"/> Pass <input type="checkbox"/> Fail

Comments – (include information on repairs made prior to testing, and recommended follow-up for failed tests)

CERTIFICATION OF TECHNICIAN RESPONSIBLE FOR CONDUCTING THIS TESTING

I hereby certify that all the information contained in this report is true, accurate and in full compliance with legal requirements.

Technician Name (print): **William Coulter**
Date: **7/22/2015**

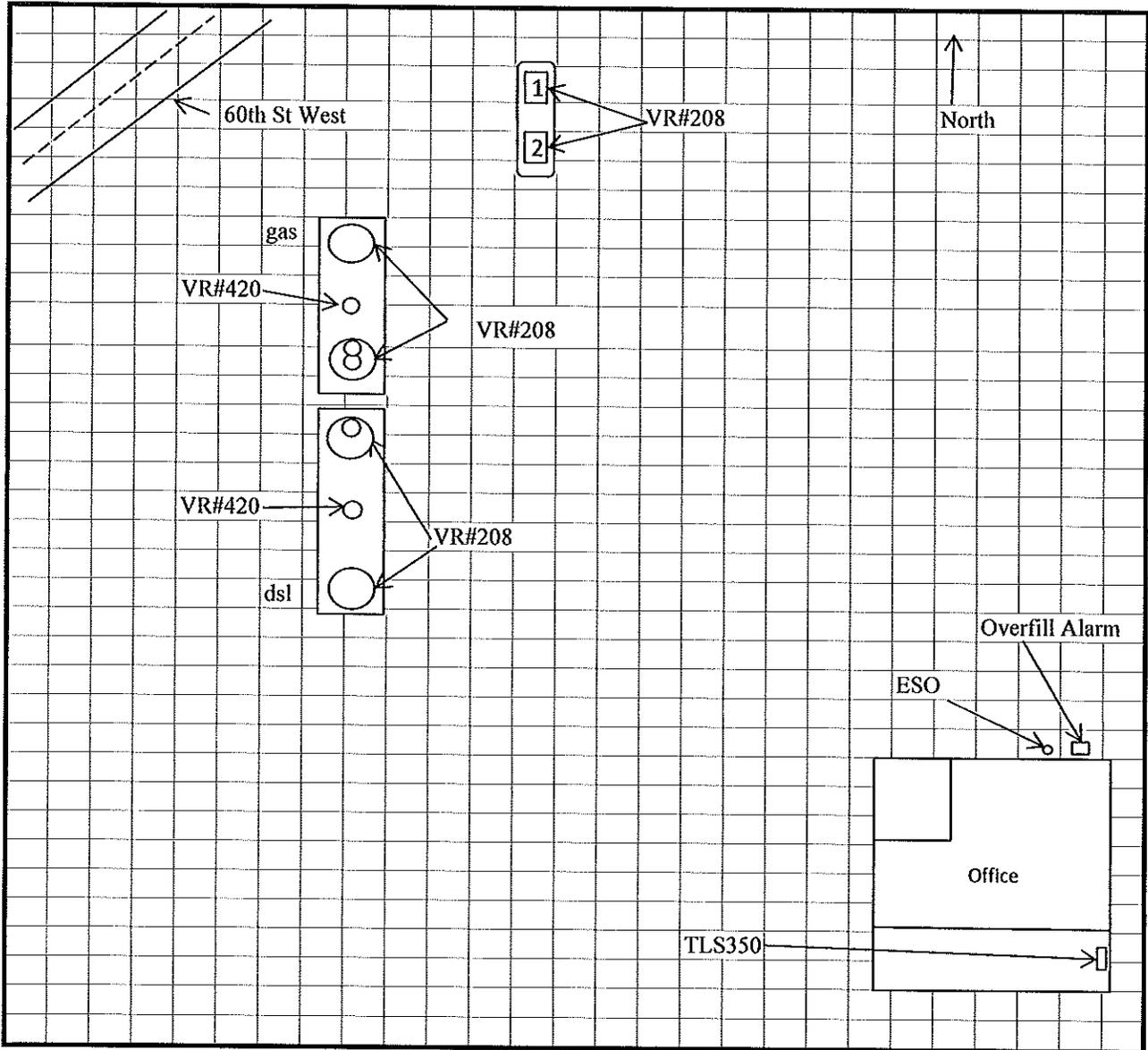

Signature

1. State laws and regulations do not currently require testing to be performed by a qualified contractor. However, local requirements may be more stringent.

UST Monitoring Site Plan

Date: 7/22/2015

Site Location: LA Cnty Sheriff - Mira Loma Det. Center
45100 60th St West
Lancaster, CA 323-568-4736



INSTRUCTIONS

If you already have a diagram that shows all required information, you may include it, rather than this page, with your Monitoring System Certification. On your site plan, show the general layout of tanks and piping. Clearly identify locations of the following equipment, if installed; monitoring system control panels; sensors monitoring tank annular spaces, sumps, dispenser pans, spill containers, or other secondary containment areas; mechanical or electronic line leak detectors; and in-tank liquid level probes (if used for leak detection). In the space provided, note the date this Site Plan was prepared.

AW Associates, Inc. - 951-372-9319
Contractors License 935423

MIRA LOMA
45100 WEST 60 TH ST
LANCASTER CA 93536
661-949-3811

JUL 22, 2015 15:19

SYSTEM STATUS REPORT

ALL FUNCTIONS NORMAL

INVENTORY REPORT

T 1:DIESEL
VOLUME = 3132 GALS
ULLAGE = 897 GALS
90% ULLAGE= 494 GALS
TC VOLUME = 3112 GALS
HEIGHT = 66.77 INCHES
WATER VOL = 0 GALS
WATER = 0.00 INCHES
TEMP = 74.0 DEG F

T 2:UNLEADED
VOLUME = 3723 GALS
ULLAGE = 4308 GALS
90% ULLAGE= 3504 GALS
TC VOLUME = 3688 GALS
HEIGHT = 52.56 INCHES
WATER VOL = 0 GALS
WATER = 0.00 INCHES
TEMP = 73.2 DEG F

***** END *****

SYSTEM SETUP

JUL 22, 2015 15:19

SYSTEM UNITS

U.S.
SYSTEM LANGUAGE
ENGLISH
SYSTEM DATE/TIME FORMAT
MON DD YYYY HH:MM:SS

MIRA LOMA
45100 WEST 60 TH ST
LANCASTER CA 93536
661-949-3811

SHIFT TIME 1 : DISABLED
SHIFT TIME 2 : DISABLED
SHIFT TIME 3 : DISABLED
SHIFT TIME 4 : DISABLED

TANK PERIODIC WARNINGS
DISABLED
TANK ANNUAL WARNINGS
DISABLED
LINE PERIODIC WARNINGS
DISABLED
LINE ANNUAL WARNINGS
DISABLED

PRINT TO VOLUMES
ENABLED

TEMP COMPENSATION
VALUE (DEG F): 60.0
STICK HEIGHT OFFSET
DISABLED
DAYLIGHT SAVING TIME
ENABLED
START DATE
APR WEEK 1 SUN
START TIME
2:00 AM
END DATE
OCT WEEK 6 SUN
END TIME
2:00 AM

COMMUNICATIONS SETUP

PORT SETTINGS:

NONE FOUND

RS-232 SECURITY
CODE : 000000

RS-232 END OF MESSAGE
DISABLED

IN-TANK SETUP

T 1:DIESEL
PRODUCT CODE : 1
THERMAL COEFF : .000450
TANK DIAMETER : 92.00
TANK PROFILE : 1 PT
FULL VOL : 4029

FLOAT SIZE: 4.0 IN. 8496

WATER WARNING : 2.0
HIGH WATER LIMIT: 3.0

MAX OR LABEL VOL: 4029
OVERFILL LIMIT : 90%
HIGH PRODUCT : 3626
DELIVERY LIMIT : 3827
DELIVERY LIMIT : 15%
DELIVERY LIMIT : 604

LOW PRODUCT : 200
LEAK ALARM LIMIT: 24
SUDDEN LOSS LIMIT: 99

MANIFOLDED TANKS
T#: NONE

LEAK MIN PERIODIC: 35%
PERIODIC TEST TYPE : 1410
STANDARD

PERIODIC TEST FAIL
ALARM DISABLED

GROSS TEST FAIL
ALARM DISABLED

PER TEST AVERAGING: OFF

TANK TEST NOTIFY: OFF

TNK TST SIPHON BREAK:OFF

DELIVERY DELAY : 5 MIN

T 2:UNLEADED
PRODUCT CODE : 2
THERMAL COEFF : .000700
TANK DIAMETER : 111.50
TANK PROFILE : 1 PT
FULL VOL : 8031

FLOAT SIZE: 4.0 IN. 8496

WATER WARNING : 2.0
HIGH WATER LIMIT: 3.0

MAX OR LABEL VOL: 8031
OVERFILL LIMIT : 90%
HIGH PRODUCT : 7227
DELIVERY LIMIT : 95%
DELIVERY LIMIT : 7629
DELIVERY LIMIT : 15%
DELIVERY LIMIT : 1204

LOW PRODUCT : 200
LEAK ALARM LIMIT: 24
SUDDEN LOSS LIMIT: 99
TANK TILT : 3.04

MANIFOLDED TANKS
T#: NONE

LEAK MIN PERIODIC: 35%
PERIODIC TEST TYPE : 2810
STANDARD

PERIODIC TEST FAIL
ALARM DISABLED

GROSS TEST FAIL
ALARM DISABLED

PER TEST AVERAGING: OFF

TANK TEST NOTIFY: OFF

TNK TST SIPHON BREAK:OFF

DELIVERY DELAY : 5 MIN

LEAK TEST METHOD

TEST ON DATE : ALL TANK
JAN 1, 1996
START TIME : DISABLED
TEST RATE : 0.20 GAL/HR
DURATION : 2 HOURS

LEAK TEST REPORT FORMAT
NORMAL

LIQUID SENSOR SETUP

L 1:DIESEL PIPING
TRI-STATE (SINGLE FLOAT)
CATEGORY : STP SUMP

L 2:DIESEL ANNULAR
TRI-STATE (SINGLE FLOAT)
CATEGORY : ANNULAR SPACE

L 3:DIESEL FILL
TRI-STATE (SINGLE FLOAT)
CATEGORY : STP SUMP

L 4:UNL PIPING
TRI-STATE (SINGLE FLOAT)
CATEGORY : PIPING SUMP

L 5:UNL ANNULAR
TRI-STATE (SINGLE FLOAT)
CATEGORY : ANNULAR SPACE

L 6:UNL FILL
TRI-STATE (SINGLE FLOAT)
CATEGORY : STP SUMP

L 7:DISPENSER PAN DIESEL
TRI-STATE (SINGLE FLOAT)
CATEGORY : DISPENSER PAN

L 8:DISPENSER PAN GAS
TRI-STATE (SINGLE FLOAT)
CATEGORY : DISPENSER PAN

EXTERNAL INPUT SETUP

OUTPUT RELAY SETUP

R 1:AUDIBLE ALARM
TYPE:
STANDARD
NORMALLY CLOSED

IN-TANK ALARMS
ALL:LEAK ALARM
ALL:HIGH WATER ALARM
ALL:OVERFILL ALARM
ALL:LOW PRODUCT ALARM
ALL:HIGH PRODUCT ALARM
ALL:PROBE OUT
ALL:HIGH WATER WARNING
ALL:DELIVERY NEEDED

LIQUID SENSOR ALMS
ALL:FUEL ALARM

R 2:ESO
TYPE:
STANDARD
NORMALLY OPEN

LIQUID SENSOR ALMS
ALL:FUEL ALARM
ALL:SENSOR OUT ALARM
ALL:SHORT ALARM

SOFTWARE REVISION LEVEL
VERSION 16.05
SOFTWARE# 346016-100-F
CREATED - 98.08.21.18.55

NO SOFTWARE MODULE
SYSTEM FEATURES:
PERIODIC IN-TANK TESTS
ANNUAL IN-TANK TESTS

ALARM HISTORY REPORT

----- IN-TANK ALARM -----

T 1:DIESEL

OVERFILL ALARM
JUL 23, 2014 12:36
JAN 13, 2014 15:53
JUL 23, 2013 13:47

HIGH PRODUCT ALARM
JAN 13, 2014 15:54
JUL 13, 2006 10:12

INVALID FUEL LEVEL
JUL 13, 2006 10:20
JUL 13, 2006 10:08

PROBE OUT

JUL 23, 2014 12:41
JUL 23, 2014 12:34
JUL 23, 2013 13:41

DELIVERY NEEDED

JUN 17, 2009 8:06
JUL 13, 2006 10:09

LOW TEMP WARNING

JUL 23, 2014 12:42
APR 21, 2011 9:08
JUL 13, 2006 10:21

***** END *****

ALARM HISTORY REPORT

----- IN-TANK ALARM -----

T 2:UNLEADED

OVERFILL ALARM
JUL 23, 2014 12:33
JAN 13, 2014 16:15
JUL 23, 2013 13:39

HIGH PRODUCT ALARM
JUL 13, 2006 9:45

INVALID FUEL LEVEL
JUL 13, 2006 9:56

PROBE OUT

JUL 23, 2014 12:33
JUL 23, 2014 12:30
JUL 23, 2013 13:40

DELIVERY NEEDED

JUL 9, 2015 15:01
JUN 17, 2015 16:56
MAY 29, 2015 12:41

LOW TEMP WARNING

APR 21, 2011 10:11
JUL 13, 2006 9:59

***** END *****

ALARM HISTORY REPORT

----- SENSOR ALARM -----
L 1:DIESEL PIPING
STP SUMP
SENSOR OUT ALARM
JUL 23, 2014 12:14

FUEL ALARM
JUL 23, 2014 12:00

SENSOR OUT ALARM
JUL 23, 2013 13:30

* * * * * END * * * * *

ALARM HISTORY REPORT

----- SENSOR ALARM -----
L 4:UNL PIPING
PIPING SUMP
SENSOR OUT ALARM
JUL 23, 2014 12:14

FUEL ALARM
JUL 23, 2014 11:44

SENSOR OUT ALARM
JUL 23, 2013 13:30

ALARM HISTORY REPORT

----- SENSOR ALARM -----
L 6:UNL FILL
STP SUMP
FUEL ALARM
DEC 12, 2014 6:03

FUEL ALARM
DEC 2, 2014 11:51

SENSOR OUT ALARM
JUL 23, 2014 12:14

* * * * * END * * * * *

* * * * * END * * * * *

ALARM HISTORY REPORT

----- SENSOR ALARM -----
L 2:DIESEL ANNULAR
ANNULAR SPACE
SENSOR OUT ALARM
JUL 23, 2014 12:14

FUEL ALARM
JUL 23, 2014 11:57

SENSOR OUT ALARM
JUL 23, 2013 13:30

* * * * * END * * * * *

ALARM HISTORY REPORT

----- SENSOR ALARM -----
L 5:UNL ANNULAR
ANNULAR SPACE
SENSOR OUT ALARM
JUL 23, 2014 12:14

FUEL ALARM
JUL 23, 2014 11:45

SENSOR OUT ALARM
JUL 23, 2013 13:30

ALARM HISTORY REPORT

----- SENSOR ALARM -----
L 7:DISPENSER PAN DIESEL
DISPENSER PAN
SENSOR OUT ALARM
JUL 23, 2014 12:14

FUEL ALARM
JUL 23, 2014 12:01

SENSOR OUT ALARM
JUL 23, 2013 13:30

* * * * * END * * * * *

* * * * * END * * * * *

ALARM HISTORY REPORT

----- SENSOR ALARM -----
L 3:DIESEL FILL
STP SUMP
SENSOR OUT ALARM
JUL 23, 2014 12:14

FUEL ALARM
JUL 23, 2014 11:56

FUEL ALARM
FEB 28, 2014 9:10

* * * * * END * * * * *

ALARM HISTORY REPORT

----- SENSOR ALARM -----
L 8:DISPENSER PAN GAS
DISPENSER PAN
SENSOR OUT ALARM
JUL 23, 2014 12:13

FUEL ALARM
JUL 23, 2014 12:02

SENSOR OUT ALARM
JUL 23, 2013 13:30

* * * * * END * * * * *

----- SENSOR ALARM -----
L 8:DISPENSER PAN GAS
DISPENSER PAN
FUEL ALARM
JUL 22, 2015 15:26

----- SENSOR ALARM -----
L 4:UNL PIPING
PIPING SUMP
FUEL ALARM
JUL 22, 2015 15:29

----- SENSOR ALARM -----
L 5:UNL ANNULAR
ANNULAR SPACE
FUEL ALARM
JUL 22, 2015 15:30

----- SENSOR ALARM -----
L 6:UNL FILL
STP SUMP
FUEL ALARM
JUL 22, 2015 15:31

----- SENSOR ALARM -----
L 7:DISPENSER PAN DIESEL
DISPENSER PAN
FUEL ALARM
JUL 22, 2015 15:32

----- SENSOR ALARM -----
L 3:DIESEL FILL
STP SUMP
FUEL ALARM
JUL 22, 2015 15:33

----- SENSOR ALARM -----
L 2:DIESEL ANNULAR
ANNULAR SPACE
FUEL ALARM
JUL 22, 2015 15:34

----- SENSOR ALARM -----
L 4:UNL PIPING
PIPING SUMP
SENSOR OUT ALARM
JUL 22, 2015 15:38

----- SENSOR ALARM -----
L 5:UNL ANNULAR
ANNULAR SPACE
SENSOR OUT ALARM
JUL 22, 2015 15:38

----- SENSOR ALARM -----
L 6:UNL FILL
STP SUMP
SENSOR OUT ALARM
JUL 22, 2015 15:38

----- SENSOR ALARM -----
L 7:DISPENSER PAN DIESEL
DISPENSER PAN
SENSOR OUT ALARM
JUL 22, 2015 15:38

----- SENSOR ALARM -----
L 8:DISPENSER PAN GAS
DISPENSER PAN
SENSOR OUT ALARM
JUL 22, 2015 15:38

----- SENSOR ALARM -----
L 1:DIESEL PIPING
STP SUMP
SENSOR OUT ALARM
JUL 22, 2015 15:38

----- SENSOR ALARM -----
L 2:DIESEL ANNULAR
ANNULAR SPACE
SENSOR OUT ALARM
JUL 22, 2015 15:38

----- SENSOR ALARM -----
L 3:DIESEL FILL
STP SUMP
SENSOR OUT ALARM
JUL 22, 2015 15:38

----- IN-TANK ALARM -----
T 2:UNLEADED
PROBE OUT
JUL 22, 2015 15:43

MIRA LOMA
45100 WEST 60 TH ST
LANCASTER CA 93536
661-949-3811
JUL 22, 2015 15:45

----- SYSTEM STATUS REPORT -----
ALL FUNCTIONS NORMAL

----- IN-TANK ALARM -----
T 2:UNLEADED
HIGH PRODUCT ALARM
JUL 22, 2015 15:46

----- IN-TANK ALARM -----
T 2:UNLEADED
PROBE OUT
JUL 22, 2015 15:47

T 2:UNLEADED
INVENTORY INCREASE
INCREASE START
JUL 22, 2015 15:46

VOLUME = 2659 GALS
HEIGHT = 40.78 INCHES
WATER = 0.99 INCHES
TEMP = 75.0 DEG F

----- IN-TANK ALARM -----
T 1:DIESEL
PROBE OUT
JUL 22, 2015 15:50

INCREASE END
JUL 22, 2015 15:54

VOLUME = 6812 GALS
HEIGHT = 88.18 INCHES
WATER = 1.15 INCHES
TEMP = 78.2 DEG F

GROSS INCREASE= 4153
TC NET INCREASE= 4094

----- IN-TANK ALARM -----
T 1:DIESEL
INVALID FUEL LEVEL
JUL 22, 2015 15:51

MIRA LOMA
45100 WEST 60 TH ST
LANCASTER CA 93536
661-949-3811

----- IN-TANK ALARM -----
T 1:DIESEL
DELIVERY NEEDED
JUL 22, 2015 15:51

JUL 22, 2015 15:54

SYSTEM STATUS REPORT

ALL FUNCTIONS NORMAL

----- SENSOR ALARM -----
L 1:DIESEL PIPING
STP SUMP
FUEL ALARM
JUL 22, 2015 15:52

----- IN-TANK ALARM -----
T 1:DIESEL
OVERFILL ALARM
JUL 22, 2015 15:52

----- IN-TANK ALARM -----
T 1:DIESEL
PROBE OUT
JUL 22, 2015 15:52

Appendix F

**Supplemental Phase II ESA Soil
Sampling Report**



**Supplemental Phase II ESA
Soil Sampling Report**

**Mira Loma Women's Village
45100 60th Street West
Lancaster, California**

**Converse Project No. 12-41-290-07
January 7, 2016**

Prepared For:

**County of the Los Angeles
Department of Public Works
900 South Fremont Avenue, 5th Floor
Alhambra, California 91803**

Prepared By:

**Converse Consultants
717 S. Myrtle Avenue
Monrovia, California 91016**



Converse Consultants

Geotechnical Engineering, Environmental & Groundwater Science, Inspection & Testing Services

January 7, 2016

Ms. Alicia Ramos
Project Manager
County of Los Angeles, Department of Public Works
900 South Fremont Avenue
5th Floor
Alhambra, California 91803

Subject: SUPPLEMENTAL PHASE II ESA SOIL SAMPLING REPORT
Mira Loma Women's Village
45100 60th Street West
Lancaster, California
DPW Contract No. PW 13598
Converse Project No. 12-41-290-07

Ms. Ramos:

Converse Consultants (Converse) is pleased to submit the attached report that summarizes the activities and the results of a *Phase II Environmental Site Assessment (Phase II ESA)* that was conducted at the referenced property.

We appreciate the opportunity to be of service. Should you have any questions or comments regarding this report, please contact either Michael Van Fleet or Laura Tanaka at 626-930-1200.

CONVERSE CONSULTANTS

Michael Van Fleet, PG
Senior Geologist



Laura Tanaka
Principal Environmental Scientist

Dist.: Addressee (2 Bound /1 PDF Format)

Table of Contents

	<u>Page</u>
EXECUTIVE SUMMARY.....	III
1.0 INTRODUCTION.....	1
2.0 BACKGROUND.....	2
2.1 Site Description and Features.....	2
2.1.1 Current Uses of the Site.....	2
2.1.2 Location and Legal Description.....	2
2.1.3 Site and Vicinity General Characteristics.....	2
2.2 Physical Setting.....	3
2.2.1 Topography.....	3
2.2.2 Geology.....	3
2.2.3 Hydrogeology.....	3
2.3 Site History and Land Use.....	3
2.4 Adjacent Property Land Use.....	4
2.5 Summary of Previous Assessment Reports.....	4
3.0 WORK PERFORMED AND RATIONALE.....	10
3.1 Scope of Assessment.....	10
3.1.1 Target Analytes.....	10
3.1.2 Target Analytes First Entered the Environment.....	10
3.1.3 Environmental Media and Locations Most Likely to Have the Highest Concentrations of Target Analytes.....	10
3.2 Soil Sample Collection.....	11
3.3 Groundwater Sample Collection.....	11
3.4 Soil Vapor Sample Collection.....	11
3.5 Field Quality Assurance/Quality Control.....	12
3.6 Chemical Analytical Methods.....	12
4.0 PRESENTATION AND EVALUATION OF RESULTS.....	13
4.1 Subsurface Conditions.....	13
4.2 Analytical Results.....	13
4.3 Data Quality Assurance/Quality Control.....	14
4.3.1 Hold Times.....	14



4.3.2	Laboratory Quality Assurance	14
4.3.3	Practical Quantitation Limits	14
5.0	INTERPRETATION AND CONCLUSIONS	15
5.1	RECs and Potential Release Area(s).....	15
5.2	Conceptual Model Validation/Adequacy of Investigations.....	15
5.3	Absence, Presence, Degree, Extent of Target Analytes	15
5.4	Other Concerns	15
5.4.1	Significant Assumptions	15
5.4.2	Limitations and Exceptions.....	16
5.4.3	Special Terms and Conditions.....	16
5.5	Conclusions/Objectives Met.....	16
6.0	RECOMMENDATIONS	18
7.0	RELIANCE.....	19
8.0	REFERENCES AND SOURCES OF INFORMATION.....	21

FIGURES

Figure 1 – Site Location

Figure 2 – Boring Location Map

TABLES

Table 1 – Summary of Analytical Results – Metals in Soil

Table 2 – Summary of Analytical Results – TPH/Organics in Soil

APPENDICES

Appendix A – Geophysical Survey Report

Appendix B – Boring Logs

Appendix C – Laboratory Analytical Report



Executive Summary

The following is an Executive Summary of the *Supplemental Phase II Environmental Site Assessment (ESA) Soil Sampling* that was conducted by Converse Consultants (Converse). Please refer to the appropriate sections of the report for a complete discussion of these issues. In the event of a conflict between this Executive Summary and the report, or an omission in the Executive Summary, the report shall prevail.

This report presents the results of the Converse *Supplemental Soil Phase II ESA Sampling* performed at 45100 60th Street West in the City of Lancaster, referred to as the Site in this report. Converse was retained by the County of Los Angeles, Department of Public Works to conduct this Phase II ESA, which was performed in general conformance with the *American Society for Testing Materials (ASTM Standard E1903-11 Standard Practice for Environmental Site Assessments: Phase II Environmental Site Assessment Process)*. The objectives of the assessment were to:

1. Evaluate potential environmental concerns in connection with the following areas of the Site: the area of a fueling station; a proposed parking area located between hangars; an alternative parking area; and an existing parking lot.
2. Identify if potential target analytes are present at concentrations greater than a threshold criteria.

The Supplemental Soil Sampling consisted of the following primary elements:

- A geophysical survey was completed in the area of the existing fuel underground storage tanks (USTs) and dispenser-island in the western portion of the Site. The full geophysical report is included as Appendix A.
- A total of eight (8) borings (SB1 through SB8) were completed to depths ranging from 8 to 15 feet below ground surface (bgs). Soil samples collected from depths of 2, 4 and 8 feet bgs from the 8-foot borings and from depths of 2, 5, 10, and 15 feet bgs from the 15-foot borings. All soil samples from 2, 4, 5, and 10 feet bgs were analyzed for Total Petroleum Hydrocarbons (TPH), Volatile Organic Compounds (VOCs), and metals in accordance with EPA Test Methods 8015M, 8260B, and 6010B/7471A respectively.

The findings of this Supplemental Soil Sampling included the following:

- Concentrations of VOCs were not detected in any of the soil samples analyzed.
- All reported metals, with the exception of arsenic, are below their respective Regional Screening Levels (RSLs) and California Human Health Screening Levels (CHHSLs) for both residential and commercial/industrial land. All reported arsenic



concentrations are less than the level that the Department of Toxic Substances Control (DTSC) has determined to be naturally occurring background levels at school sites in California.

- TPH in the gasoline range was not detected in any of the samples analyzed.
- TPH in the diesel and oil ranges was reported in a limited number of the samples analyzed, but at concentrations below the Maximum Soil Screening Levels (MSSLs). The concentration of TPH in the diesel range in sample SB7 from, 2 feet bgs (120 mg/kg) exceeded the RSL for residential land use of 110 mg/kg, but is less than the RSL for commercial/industrial land use of 600 mg/kg. It is suspected that the TPH concentrations in this sample may be elevated as a result of the overlying asphalt surface cover having been mixed into the sample. All reported concentrations of TPH in the oil range are less than the RSL for residential land use.

Based upon the findings of this assessment, Converse has made the following conclusions and recommendations:

- No significant impacts were detected in any of the soil samples that would affect the current or future planned land use of the Site.
- It is our opinion that the objectives of the *Supplemental Phase II ESA Soil Sampling* were met, and no additional assessment is necessary to assess the objectives of this assessment.



1.0 Introduction

This Report presents the results of the Converse Consultants (Converse) *Supplemental Phase II ESA Soil Sampling* that was performed at the subject property at 45100 60th Street West in the City of Lancaster, referred to as the Site in this Report. Converse was retained by the County of Los Angeles, Department of Public Works (*User*) to conduct the *Phase II ESA* at the Site. The scope of this *Supplemental Phase II ESA Soil Sampling* was completed in accordance with the revised proposal prepared by Converse dated December 3, 2015.

Converse generally followed the standard practices of the American Society for Testing Materials (ASTM) Designation: E1903-11 *Standard Practice for Environmental Site Assessments: Phase II Environmental Site Assessment Process* (ASTM, E 1903-11). The purpose of conducting the *Supplemental Phase II ESA Soil Sampling* in accordance with ASTM E1903-11 is to acquire and evaluate information sufficient to achieve the objective(s) set forth in the "Statement of Objectives" developed by the *User* and Converse. The objectives of the assessment were to:

1. Evaluate potential environmental concerns in connection with the following areas of the Site: the area of a fueling station; a proposed parking area located between hangars; an alternative parking area; and an existing parking lot.
2. Identify if potential target analytes are present at concentrations greater than a threshold criteria.



2.0 Background

Information in the following sections was obtained from the Phase I ESA prepared on the Site by Converse, dated May 16, 2014.

2.1 *Site Description and Features*

2.1.1 *Current Uses of the Site*

The Site is owned by the County of Los Angeles. It was most recently operated by the Los Angeles County Sheriff Department as a Detention Facility. Inmates at the detention facility vacated the premises in November 2013. The Los Angeles County Sheriff Department remains at the facility and presently uses the facility for general office purposes, training and a community service program. It is understood that the facility is in the process of undergoing redevelopment of use a women only detention facility (Women's Village).

2.1.2 *Location and Legal Description*

The Site is located at 45100 60th Street West and consists of a portion of one (1) parcel. The Site is located on the east side of 60th Street West, southeast of the intersection of West Avenue I and 60th Street West, in the City of Lancaster, Los Angeles County, California.

The Site is located approximately 2.5-miles west of State Route 14 (Antelope Valley Freeway) and 4.0-miles south of State Route 138 (Pearblossom Highway).

The Los Angeles County Assessor's Parcel Number (APN) for the Site is 3203-014-901. A legal description of the Site parcel was obtained from the Title Report prepared by Environmental Data Resources, Inc. (EDR) and is described as follows:

All that certain piece or parcel of land being a portion of the North Half and a portion of the Southeast Quarter of Section 14, Township 7 North, Range 13 West, situate and lying in the County of Los Angeles, State of California.

2.1.3 *Site and Vicinity General Characteristics*

The Site consists of a portion of one approximately 143 acre parcel of land containing numerous buildings, asphalt, concrete or unpaved parking areas; walkways and landscaped grounds.



The Site is generally level with a slight slope toward the east. The Site fronts onto 60th Street West on the west and West Avenue I on the north. Properties in the general area are used for government facilities or are undeveloped. Undeveloped land is to the north across West Avenue I, Los Angeles County Challenger Memorial Youth center is to the east, the High Desert Hospital Facility and California State Prison are to the south, and a women's shelter, apartment complex and undeveloped land is to the west.

2.2 Physical Setting

2.2.1 Topography

The Site is located approximately 2,350 feet above mean sea level with surface topography sloping towards the east (United States Geological Survey [USGS] Topographic Map, Lancaster West, California, 1974 photo revised 1954).

2.2.2 Geology

The Site is underlain by alluvium, lake, playa, and terrace deposits; unconsolidated and semi-consolidated, mostly nonmarine deposits (Division of Mines and Geology, Geologic Map of California, 2010).

2.2.3 Hydrogeology

The Site is located in the Antelope Valley Groundwater Basin. Groundwater information, obtained from Los Angeles County Department of Public Works, identified one nearby well (Well No. 11186) as having a groundwater depth of 151 feet bgs, measured in May 2010. This well is located approximately 1½-miles northeast of the Site near the intersection of West Avenue G and 50th Street West.

Groundwater flow direction has not been measured at the Site, but may likely follow the topographic gradient and flow in an easterly direction.

2.3 Site History and Land Use

The Site was undeveloped from as early as 1928. In the early 1940s the Site was originally developed for use as a pilot training facility. The flight academy closed in 1945. The Mira Loma Detention Facility began to operate in the mid 1950s. Sometime prior to the late 1980s, the Site appeared much as it does



today with the original and new barracks buildings, office and training buildings, hangars, kitchen/dining building and steam plant.

2.4 Adjacent Property Land Use

The adjoining properties were undeveloped from as early as 1928 until sometime in the early 1940s the south adjacent property was developed along with the Site for use as a pilot training facility. Prior to 1948 a residential development appeared to the west. This residential development has remained as a housing facility for LA County Sheriff's and for battered women until the present day. From sometime prior to the late 1980s, development of the California State Prison began south of the Site and remains today. Adjacent areas to the north and east remain undeveloped.

2.5 Summary of Previous Assessment Reports

Phase I ESA conducted by Converse

Converse prepared a Phase I ESA on the Site, and south adjacent hospital facility (referred to together as the Property), dated May 16, 2014. Information obtained during the Phase I ESA is summarized below. As the Phase I ESA was completed on a larger area, not all the information presented below pertains to the Site which was assessed as part of this Phase II ESA.

- According to historical information, it appears that the Property was undeveloped from as early as 1917 until sometime in the early 1940s when the Property was originally developed for use as a pilot training facility (Polaris Flight Academy). The present day hospital buildings southeast of 60th Street West and West Avenue I still remain as well as the original barracks, hangars, living quarters and swimming pools. The flight academy closed in 1945. The Mira Loma Detention Facility and Hospital began to operate in the mid 1950s. Sometime prior to the late 1980s, the Property appeared much as it does today with the High Desert Hospital, modular buildings, facilities buildings, and parking as well as the Mira Loma Detention Facility operated by the LA County Sheriff with the original and new barracks buildings, office and training buildings, hangars, kitchen/dining building and steam plant. Construction of solar panels east of the Detention Facility was in 2012.
- At the time of the Phase I ESA, the Property was used by the LA County Sheriff at the Mira Loma Detention Facility as a training facility, office purposes and a community service program; and the High Desert Hospital for medical services including surgeries, x-rays, urgent care, rehabilitation services and medical clinics.



- The Property currently has one 8,000-gallon gasoline fuel UST and one 4,000-gallon diesel fuel UST located at the fueling station, one 10,000-gallon diesel fuel UST located at the Steam Plant, one 4,000-gallon diesel fuel UST located at Administration Building 3, one 2,000-gallon jet fuel AST located at the Heliport and one 4,000-gallon diesel fuel UST located at the Hospital emergency generator.
- Three hydraulic hoists and one clarifier system, as well as 55-gallon drums of motor oil, used oil and used coolant, were located in the Vehicle Fleet Service Garage. Used oil is picked-up and hauled off-site by Thermal Fluid.
- Two 5-gallon unlabeled containers of an oil/tar-like substance were observed in the Sergeant Senior Building with minor staining to the carpeted floor beneath. Three one-gallon containers of insecticide were observed in a locked storage cabinet in the old Hangar Building, as well as one 55-gallon drum of used oil, in the Hangar.
- Numerous containers of cleaners/degreasers, insecticides and germicides are stored on the Property (quart containers or one to five-gallon containers). Motor oil and used oil are stored on the Property in 55-gallon drums. Bio-hazardous waste and hazardous waste is stored on the Property. All of the containers and drums appeared to be store properly and no apparent leaks were observed.
- Hydraulic oil was observed on the concrete floor beneath a Hole Punch machine in the George Barracks. Hydraulic oil was observed on the asphalt/concrete floor around the emergency generator near the Steam Plant.
- The Property was listed in the regulatory database report as follows:
 - LA County Sheriff’s Department Mira Loma was listed as a LUST site in 1999. A site assessment was completed in March 1999, clean-up was completed and the facility was granted a “case closed” status in September 2003.
 - LA County Sheriff’s Department Mira Loma was listed in 2001 to 2012 as a RGA LUST facility as a non-generator site. No specific information for this facility was provided in the database.
 - LA County Sheriff Mira Loma Facility is listed as a historical UST site. No site specific information was provided in the database.
 - Mira Loma Sheriff was listed as an historical UST site with two reported USTs. Tank #1 was reportedly installed in 1975 and contained regular product. Tank #2 contained unleaded product with no installation date reported. Leak detection for both tanks was reported as stock inventory.



- Mira Loma Hospital was listed as an historical UST site with two reported USTs. Tank #1 was reportedly installed in 1960 and contained diesel. Tank #2 contained diesel with no installation date reported. Leak detection for both tanks was reported as stock inventory or visual.
- Los Angeles Health Service Mira Loma Hospital was listed as a RCRA small quantity generator of hazardous waste. No specific information for this facility was provided in the database. No violations were specified.
- LA County Sheriff Mira Loma Facility was listed as a HMS site with a permit to operate.
- County of Los Angeles Sheriff Department Mira Loma was listed as a HAZNET site in 2001 for generating aqueous solution with total organic residues less than 10 percent; in 2002 for generating aqueous solution with total organic residues less than 10 percent; in 2007 for generating asbestos-containing waste; in 2008 for generating other organic solid waste, hydrocarbon solvents, asbestos-containing waste; in 2010 for generating waste oil and mixed oil; in 2012 for generating unreported waste. Disposal methods included a landfill, fuel blending at another site, recovery for reuse off-site or recycler.
- High Desert Hospital was listed as a HAZNET site in 1999 for generating 3.79 tons of asbestos-containing waste. The disposal method was not reported.
- Los Angeles County High Desert Solar Project was listed as an NPDES site for construction related wastewater discharge. The effective date of regulatory measure was January 2012 with a termination date of regulatory measure of October 2012. No violations were listed for this facility.
- Polaris Flight Academy and Lancaster Training Field, (addresses not identified) were both listed as Envirostor facilities. Both of these facilities were designated on the EDR database as well as the Envirostor website as being located north of the Property, beyond West Avenue I. Information obtained from the Envirostor website indicated that Polaris Flight Academy was comprised of three separate airfields including War Eagle Field (formerly on the Property). War Eagle Field consisted of 640 acres and contained all operational and training facilities. In 1947, War Eagle Field was sold to the County of Los Angeles. Polaris Flight Academy is listed with the DTSC as “inactive-needs evaluation” as of July 2005. The potential media affected and the potential contaminants of concern were not identified. The DTSC is the lead agency involved with these projects. Funding for evaluation, investigation or remediation is



through Defense Environmental Restoration Account (DERA). Inventory Project Reports were completed for these facilities in 1997 and 1998. According to the EDR report and Envirostor website, Polaris Flight Academy appears to be located north of the Property beyond West Avenue I. However, historical records indicate that Polaris Flight Academy was also located on the Property and used as a training facility for pilots as well as having an airstrip.

- Regulatory agency files pertaining to UST removal and installation at the Property included:
 - One 1,000-gallon UST was removed from the Hospital Property in 1993. Soil samples were collected and analyzed. DPW issued a “closure” letter indicating that all requirements had been met.
 - One 4,000-gallon double-walled fiberglass UST was installed at the Hospital Property in 1988 for their emergency generator. On July 25, 2013, a routine UST Inspection Report indicated that the annular space failed testing on June 20, 2013. The Property was to obtain a permit and make repairs. Upon completion of the repair work they were to retest and resubmit results. At the time of Converse Property reconnaissance, this work still had not been completed.
 - In November and December 1998 six USTs were removed from the Mira Loma Detention Facility. GeoMat Engineering, Inc. collected soil samples beneath the centers of the USTs found contamination at varying concentrations from a low of 340 parts per million to a high of 1,200 ppm hydrocarbon compounds and recommended further assessment. Shaw Environmental & Infrastructure, Inc. further assessed the extent of contamination and completed the site investigation and corrective action and submitted their findings to DPW. A “no further action” letter was submitted to the Property for the removal of six USTs in September 2003 and the Property was granted “case closed” status.
 - In November 1998 USTs to be installed at the Mira Loma Detention Facility included one 4,000-gallon diesel fuel for emergency generator, one 4,000-gallon diesel fuel UST for fueling station, one 8,000-gallon gasoline for fueling station, one 10,000-gallon amber light fuel and one 500-gallon diesel fuel for emergency generator.
 - One 500-gallon USTs was removed from the Property in 2006. Three soil samples were collected and analyzed. Based on the findings the DPW granted the Property a “no further action” letter and the case was closed.



- As of July 2008 the DPW Environmental Programs Division has confirmed that four USTs are located on the Mira Loma Detention Facility Property. Each tank is double walled, fiberglass construction with secondary containment.
- Converse reviewed the leak detection reports maintained for Mira Loma Detention Facility. As of January 1, 2013 secondary containment of the two fuel tanks at the fueling station failed for the turbine sump and fill sump; and one diesel fuel USTs at the Steam Plant failed for secondary containment piping and fill sump. Leak detection failures are being investigated by the Sheriff Department.

The report concluded that there was no evidence of *recognized environmental conditions* (RECs) in connection with the Property except for the following:

- Possible environmental impact resulting from historic uses as a flight academy and airstrip.
- The existing USTs on the Property having failed their leak detection tests.
- The existence of hydraulic hoists in the vehicle service garage.
- Hydraulic oil beneath equipment in the George Barracks building and emergency generator at steam plant.

Based on the Phase I ESA, Converse recommended further assessment of the Property. The recommendations pertaining to the Site included only the following:

- The concrete/asphalt areas beneath the emergency generator should be cleaned, preventative measures taken to ensure that future leaks do not occur and testing the soil beneath the equipment to ensure that the subsurface soil has not been impacted.

The remaining Phase I ESA recommendations do not apply to the Site as they are not located within the areas of concern that are currently being assessed.

Phase II ESA conducted by Converse

Converse prepared a Phase II ESA on the Site, dated March 9, 2015. Information obtained during that Phase II ESA is summarized below. The objectives of the assessment were to:

- Evaluate environmental concerns in connection with the Site that were identified during a Phase I ESA conducted by Converse. Some of the proposed boring locations will be completed in “alternate” project parking lot locations and building locations. Development of the parking lots and buildings is proposed to impact 5-feet below grade.



- Identify if potential target analytes are present at concentrations greater than a threshold criteria.

The Phase II ESA consisted of the following primary elements:

- A total of 14 borings (M1 through M14) were completed to depths of 8 feet below ground surface (bgs) or refusal, with soil samples collected from depths of 2, 4 and 8 feet bgs. Refusal was only encountered in one (1) boring (M7), and the deepest soil sample from that boring was collected at 6 feet bgs where refusal was encountered. All soil samples from 2 and 4 feet bgs were analyzed for Total Petroleum Hydrocarbons (TPH), Volatile Organic Compounds (VOCs), and metals in accordance with EPA Test Methods 8015M, 8260B, and 6010B/7471A respectively.

The findings of that Phase II ESA included the following:

- Concentrations of VOCs were not detected in any of the soil samples analyzed.
- All reported metals, with the exception of arsenic, are below their respective California Human Health Screening Levels (CHHSLs) for both residential and commercial/industrial land. All reported arsenic concentrations are less than the level that the Department of Toxic Substances Control (DTSC) has determined to be naturally occurring background levels at school sites in California.
- Concentrations of TPH was not detected in any of the samples analyzed in the gasoline range. TPH in the diesel range (C13-C22) and heavy hydrocarbon (oil) range (C23-C40) was reported in a limited number of the samples analyzed, but at concentrations below the Maximum Soil Screening Levels (MSSLs) established by the Los Angeles Regional Water Quality Control Board (RWQCB). Concentrations of TPH in the diesel and/or oil ranges exceeded the Regional Screening Levels (RSLs) for residential land use of 110 and 2,500 milligrams per kilogram (mg/kg), respectively, in two samples from 2 feet bgs (M1 and M10), but these concentrations are less than the RSLs for commercial/industrial land use of 600 and 33,000 mg/kg, respectively. It is suspected that the TPH concentrations in these samples may be elevated as a result of the overlying asphalt surface cover having been mixed into the samples.

Based upon the findings of that assessment, Converse made the following conclusions and recommendations:

- No significant impacts were detected in any of the soil samples that would affect the current or future planned land use of the Site.

It was concluded that no additional assessment is necessary to assess the objectives of that Phase II ESA.



3.0 Work Performed and Rationale

3.1 Scope of Assessment

A conceptual model was developed based on data presented regarding the present and historic use of the Site.

3.1.1 Target Analytes

Potential target analytes include TPH, VOCs, and metals.

3.1.2 Target Analytes First Entered the Environment

The concerns associated with the Site appear to indicate that target analytes would have first entered the environment by surface spills or releases to the surface soils.

3.1.3 Environmental Media and Locations Most Likely to Have the Highest Concentrations of Target Analytes

These data indicated that the environmental media most likely to have the highest concentrations of target analytes is soil.

The scope of this Supplemental Phase II ESA Soil Sampling consisted of the following primary elements:

- A geophysical survey was completed in the area of the existing fuel underground storage tanks (USTs) and dispenser-island in the western portion of the Site.
- A total of eight (8) borings (SB1 through SB14) were completed to depths of 8 or 15 feet bgs. Soil samples collected from depths of 2, 4 and 8 feet bgs from the 8 foot borings, and from 2, 5, 10, and 15 feet bgs from the 15 foot borings. All soil samples from 2, 4, 5, and 10 feet bgs were analyzed for TPH, VOC, and metals in accordance with EPA test methods 8015M, 8260B, and 6010B/7471A, respectively. The remaining soil samples (from 8 and 15 feet bgs) were archived.

3.2 Geophysical Survey

On Monday, December 14, 2015, Converse oversaw personnel from Southwest Geophysics complete a geophysical survey at the Site. The purpose of the survey was to assess the limits of the backfilled excavation(s) associated with the onsite



fuel tanks (USTs) and the presence of detectable underground piping and utilities in the study area. The survey included the use of a Geonics model EM61 MK2 time domain instrument, GSSI SIR 3000 Ground Penetrating Radar (GPR) unit using a 400 MHz transducer, Schonstedt GA-52 magnetic gradiometer, Fisher M-Scope TW-6 pipe and cable locator, and RD8000 line tracer. The results of the survey did reveal the extents of the backfill associated with the UST pit as well as numerous associated underground product and vent lines. A copy of the geophysical survey report is included in Appendix A.

3.3 Soil Sample Collection

On Thursday, December 17, 2015, Converse oversaw personnel from Interphase Environmental advance 8 borings, using a direct push (Geoprobe®) drill rig for the collection of soil samples. Soil borings SB1 and SB2, completed in the vicinity of the USTs, were advanced to a maximum depth of 15 feet bgs, and all other borings were completed to a maximum depth of 8 feet bgs.

Soil samples were collected from each of the 8-foot borings at depths of 2, 4, and 8 feet bgs, and from the 15 foot borings at 2, 5, 10, and 15 feet bgs. The acetate liners, which contain the retrieved soil cores, were cut at the appropriate sample depths. Subsamples were collected from each sample sleeve using EnCore sample containers. A portion of all soil samples were transferred into sealable bags for field screening and lithologic evaluation. The sample containers were sealed, labeled, and placed on ice for transport to a California-certified laboratory under chain-of-custody control.

Soil descriptions are presented on the boring logs in Appendix B. Soils were screened in the field for VOCs using a photo ionization detector (PID). Results of the field screening are presented on the boring logs.

3.4 Groundwater Sample Collection

Groundwater was not encountered during this investigation.

3.5 Soil Vapor Sample Collection

Soil vapor samples were not collected during this investigation.



3.6 Field Quality Assurance/Quality Control

The following are some of the quality assurance and quality control measures that were taken to evaluate the quality of the data generated:

- Standard EPA sample handling protocol including chain-of-custody control were followed.
- New dedicated sampling equipment was used for the collection of samples.

3.7 Chemical Analytical Methods

American Environmental Testing Laboratory (AETL), in Burbank, California analyzed select soil samples in accordance with the following EPA test methods:

- EPA Test Method 6010B/7471A for metals
- EPA Test Method 8015M for TPH
- EPA Test Method 8260B for VOCs



4.0 Presentation and Evaluation of Results

4.1 Subsurface Conditions

The soils observed in subsurface samples collected were generally sand or silty sand with minor amounts of clay, to maximum depths explored (15 feet bgs). The soil samples were generally brown in color and slightly moist.

Concentrations of VOCs measured in the field with the PID were all 0.0 parts per million (ppm). No staining, odors, or other signs of contamination were noted in any of the samples. See the boring logs in Appendix B for complete descriptions.

Groundwater was not encountered in any of the borings completed to depths up to 15 feet bgs.

4.2 Analytical Results

The analytical report from the laboratory is provided in Appendix C. Tabulated data for the sample analyses are included in Tables 1 and 2.

- VOCs were not detected in any of the soil samples analyzed.
- All reported metals, with the exception of arsenic, are below their respective Regional Screening Levels (RSLs) established by the EPA, and the California Human Health Screening Levels (CHHSLs) established by the California EPA, for both residential and commercial/industrial land use. Arsenic was detected in 1 of the 18 samples analyzed, at a maximum concentration of 4.44 milligrams per kilogram (mg/kg), which is less than the concentration of 12 mg/kg that the Department of Toxic Substances Control (DTSC) has determined to be naturally occurring background levels at school sites in California.
- TPH in the gasoline range (C4-C12) was not detected in any of the samples analyzed. TPH in the diesel range (C13-C22) was reported in one (1) sample at a concentration of 120 mg/kg, and TPH in the heavy hydrocarbon (oil) range (C23-C40) was reported in four (4) samples at a maximum concentration of 1,040 mg/kg. These concentrations are below the Maximum Soil Screening Level (MSSL) established by the RWQCB of 1,000 and 10,000 mg/kg, respectively.

Concentrations of TPH in the diesel range in sample SB7 from 2 feet bgs (120 mg/kg) exceeds the RSL for residential land use of 110 mg/kg, but is less than the RSLs for commercial/industrial land use of 600 mg/kg. It is



noted that the sample from this location was collected in an area covered with asphalt, and it is possible that the elevated TPH reading in the sample is a result of overlying asphalt having been mixed in. No signs of contamination were noted in the sample, and TPH is reported as non-detect in the underlying sample from 4 feet bgs. All reported concentrations of TPH in the oil range are less than the RSL for residential land use.

4.3 Data Quality Assurance/Quality Control

4.3.1 Hold Times

All soil samples were transported to the laboratory under chain-of-custody documentation, and were analyzed within appropriate hold times.

4.3.2 Laboratory Quality Assurance

The laboratory provided data to estimate precision, accuracy, and bias. The laboratory report indicate that the method blanks, laboratory spikes, and/or matrix spikes met quality assurance objectives. Overall, the presented data are reliable and useable for project decision making. Laboratory Quality Assurance data are included in the analytical report in Appendix C.

4.3.3 Practical Quantitation Limits

- The Practical Quantitation Limit (PQL) for TPH as gasoline, diesel, and oil ranges, in soils were 1.0, 5.0, and 5.0 mg/kg, respectively.
- The PQLs for VOCs in soils ranged from 0.001 to 0.050 mg/kg.
- The PQL for metals in soil ranged from 0.2 mg/kg to 5.0 mg/kg.

5.0 Interpretation and Conclusions

5.1 *RECs and Potential Release Area(s)*

Based on the former use of the Site, it was suspected that VOCs, TPH, and/or metals would likely have first entered the environment by surface spills or releases to surface soil.

5.2 *Conceptual Model Validation/Adequacy of Investigations*

It is our opinion that the field and analytical data validated the conceptual model and the investigation adequately evaluated the identified objectives of the *Phase II ESA*.

5.3 *Absence, Presence, Degree, Extent of Target Analytes*

All reported metals concentrations are relatively consistent between the various sample locations, and appear to be naturally occurring background levels.

No concentrations of VOCs or TPH in the gasoline range were detected in any of the soil samples analyzed.

Concentrations of TPH detected in the soil samples analyzed are less than MSSL values, and therefore do not present a significant threat to groundwater. With one exception, all concentrations of TPH in the diesel and oil ranges are less than the RSLs for residential land use. However, the exceedance in sample SB7 at 2 feet bgs is suspected to be a result of cross contamination from the overlying asphalt surface cover. Therefore, concentrations of TPH are not considered to pose a significant health risk to Site occupants.

5.4 *Other Concerns*

5.4.1 *Significant Assumptions*

No significant assumptions need to be noted in this *Supplemental Phase II ESA Soil Sampling* report.



5.4.2 *Limitations and Exceptions*

No limitations or exceptions were encountered during the completion of this Phase II ESA.

5.4.3 *Special Terms and Conditions*

No special terms or conditions need to be noted in this *Phase II ESA* report.

5.5 Conclusions/Objectives Met

Converse has performed *Supplemental Phase II ESA Soil Sampling* at 45100 60th Street West in general conformance with the scope and limitations of ASTM, E1903-11 and the following objectives:

1. Evaluate potential environmental concerns in connection with the following areas of the Site: the area of a fueling station; a proposed parking area located between hangars; an alternative parking area; and an existing parking lot.
2. Identify if potential target analytes are present at concentrations greater than a threshold criteria.

Based upon the above, Converse has concluded the following:

- VOCs were not detected in any of the soil samples analyzed.
- All reported metals, with the exception of arsenic, are below their respective RSL and CHHSL values for both residential and commercial/industrial land. All reported arsenic concentrations are less than the level that DTSC has determined to be naturally occurring background levels at school sites in California.
- TPH in the gasoline range was not detected in any of the samples analyzed.
- TPH in the diesel and oil ranges was reported in a limited number of the samples analyzed, but at concentrations below the MSSLS established by the LARWQCB. The concentration of TPH in the diesel range in sample SB7 from, 2 feet bgs (120 mg/kg) exceeded the RSL for residential land use of 110 mg/kg, but is less than the RSL for commercial/industrial land use of 600 mg/kg. It is suspected that the TPH concentrations in this sample may be elevated as a result of the overlying asphalt surface cover having been mixed into the sample. All reported concentrations of TPH in the oil range are less than the RSL for residential land use.



No significant impacts were detected in any of the soil samples that would affect the current or future planned land use of the Site. It is our opinion that the objectives of the Supplemental Soil Sampling were met, and no additional assessment is necessary to assess the objectives of the Supplemental Soil Sampling.



6.0 Recommendations

It is Converse's opinion that no additional assessment is necessary at this time to address the objectives of the Supplemental Soil Sampling.



7.0 Reliance

This report is for the sole benefit and exclusive use of the County of Los Angeles, Department of Public Works, in accordance with the terms and conditions of our Master Services contract under which these services have been provided. The preparation of this report has been in accordance with generally accepted environmental practices. No other warranty, either express or implied, is made. This report should not be regarded as a guarantee that no further contamination beyond that which could be detected within the scope of this assessment is present at the Site.

This report should not be regarded as a guarantee that no further contamination, beyond that which could be detected within the scope of this assessment, is present at the Site. Converse makes no warranties or guarantees as to the accuracy or completeness of information provided or compiled by others. It is possible that information exists beyond the scope of this assessment. It is not possible to absolutely confirm that no hazardous materials and/or substances exist at the Site. If none are identified as part of a limited scope of work, such a conclusion should not be construed as a guaranteed absence of such materials, but merely the results of the evaluation of the Site at the time of the assessment. Also, events may occur after the Site visit, which may result in contamination of the Site. Additional information, which was not found or available to Converse at the time of report preparation, may result in a modification of the conclusions and recommendations presented.

Any reliance on this report by Third Parties shall be at the Third Party's sole risk. Should the User wish to identify any additional relying parties not previously identified, a completed Application of Authorization to Use (see following page) must be submitted to Converse Consultants.





Converse Consultants

Geotechnical Engineering, Environmental & Groundwater Science, Inspection & Testing Services

Application for Authorization to Use

TO: Converse Consultants
222 E. Huntington Drive, Suite 211
Monrovia, California 91016

Project Title & Date: _____

Project Address: _____

FROM: (Please identify name & address of person/entity applying for permission to use the referenced report.)

Applicant _____ hereby applies for permission to use the referenced report in order to:

Applicant wishes or needs to use the referenced report because:

Applicant also understands and agrees that the referenced document is a copyrighted document and shall remain the sole property of Converse Consultants. Unauthorized use or copying of the report is strictly prohibited without the express written permission of Converse Consultants. *Applicant* understands and agrees that Converse Consultants may withhold such permission at its sole discretion, or grant such permission upon agreement to Terms and Conditions, such as the payment of a re-use fee, amongst others.

Applicant Signature: _____

Applicant Name (print): _____

Title: _____

Date: _____



8.0 References and Sources of Information

California Environmental Protection Agency, Use of California Human Health Screening Levels in Evaluation of Contaminated Properties, January 2005.

California Department of Conservation, Division of Mines and Geology, Geologic Map of California, 1991.

Converse Consultants, Phase I Environmental Site Assessment – Mira Loma Detention Facility and Transitional Facility (AB900), 45100 60th Street West, Lancaster, California, May 16, 2014

Converse Consultants, Phase II Environmental Site Assessment – Mira Loma Women’s Village, 45100 60th Street West, Lancaster, California, March 9, 2015

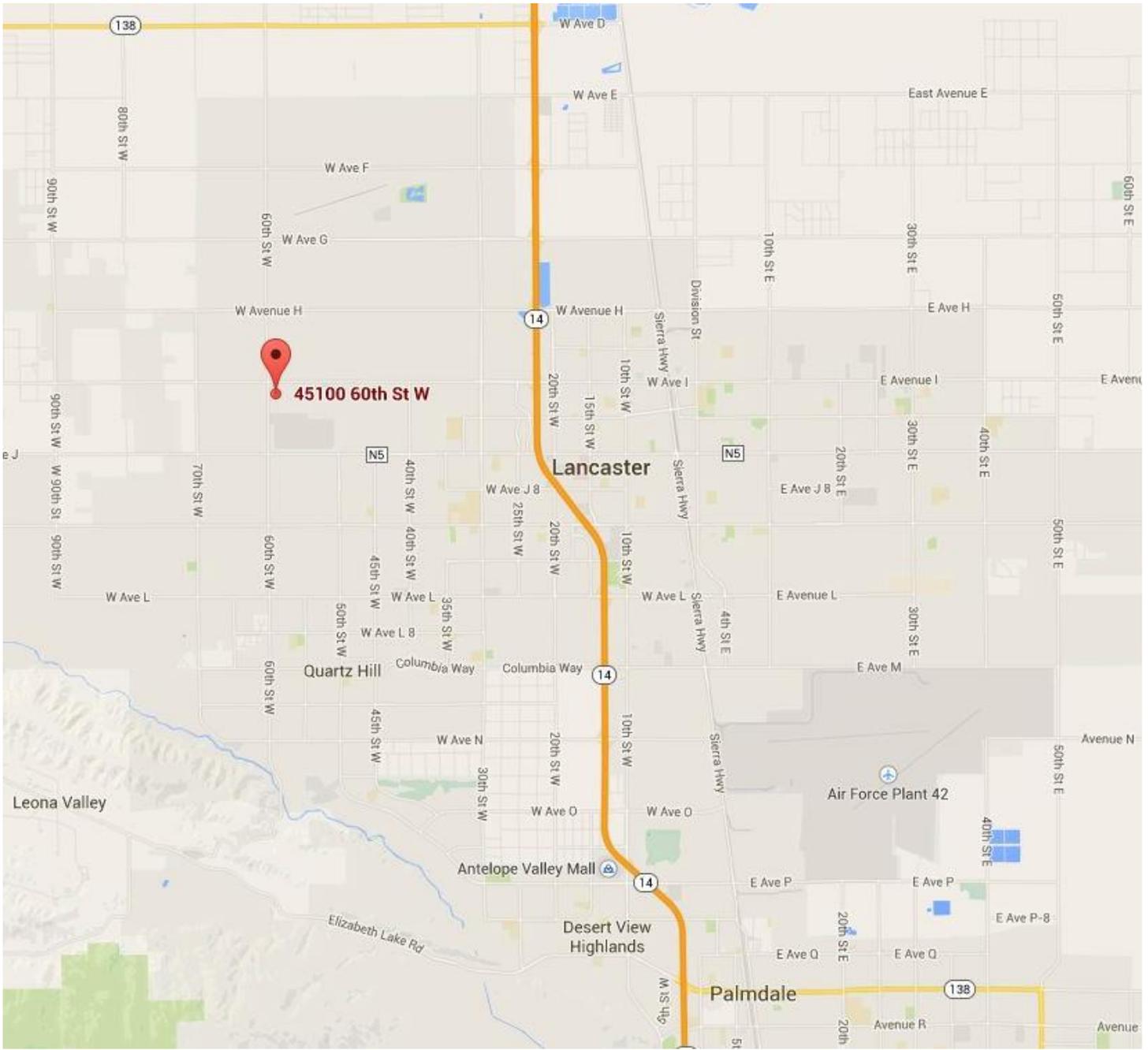
United States Geological Survey, 7.5-Minute Topographic Quadrangle, Lancaster West, 1954, photorevised 1974.



Figures

Figures





SITE LOCATION



County of Los Angeles, Department of Public Works
 Mira Loma Women’s Village
 45100 60th Street West
 Lancaster, California

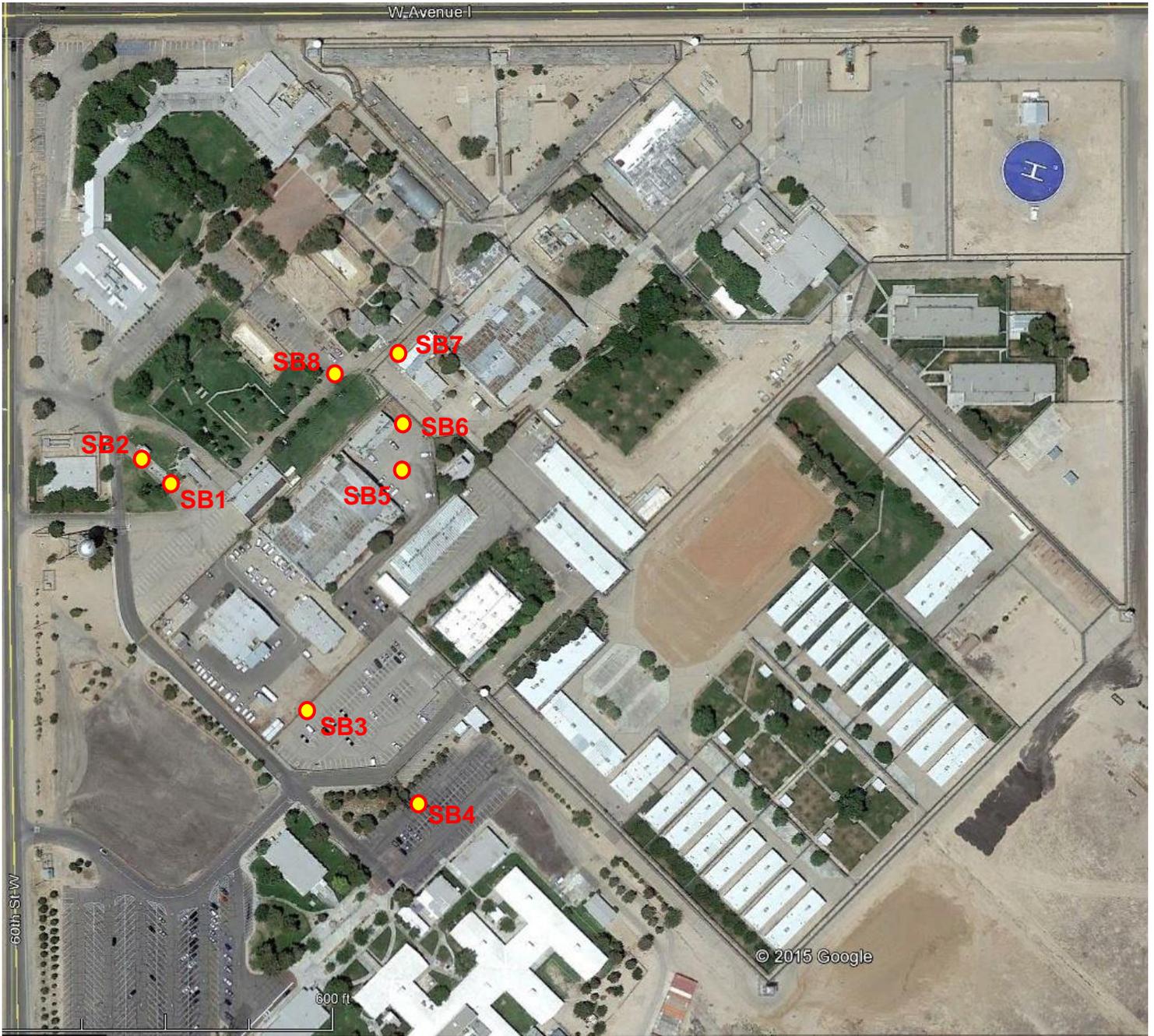
Project No:

12-41-290-07



Converse Consultants

FIGURE 1



BORING LOCATION MAP



County of Los Angeles, Department of Public Works
Mira Loma Women's Village
45100 60th Street West
Lancaster, California

Project No:

12-41-290-07



Converse Consultants

FIGURE 2

Tables



Table 1
Summary of Analytical Results - Metals in Soil
LADPW - Mira Loma Women's Village
45100 60th Street West
Lancaster, California

Boring Location	Depth (feet bgs)	Date	Metals (mg/kg)																
			Antimony	Arsenic	Barium	Beryllium	Cadmium	Chromium	Cobalt	Copper	Lead	Mercury ^	Molybdenum	Nickel	Selenium	Silver	Thallium	Vanadium	Zinc
SB1	2	12/17/15	ND	ND	34.5	ND	ND	7.52	5.72	10.2	ND	ND	ND	5.53	ND	ND	ND	25.8	47.6
	5	12/17/15	ND	4.44	69.4	ND	ND	7.40	6.24	5.09	ND	ND	ND	5.05	ND	ND	ND	46.1	47.9
	10	12/17/15	ND	ND	84.1	ND	ND	9.19	7.48	6.22	ND	ND	ND	5.70	ND	ND	ND	34.9	57.1
SB2	2	12/17/15	ND	ND	23.0	ND	ND	3.94	3.35	3.82	ND	ND	ND	3.04	ND	ND	ND	20.5	26.5
	5	12/17/15	ND	ND	45.5	ND	ND	4.30	3.91	4.45	ND	ND	ND	2.92	ND	ND	ND	25.2	31.8
	10	12/17/15	ND	ND	92.7	ND	ND	6.67	5.34	5.48	ND	ND	ND	4.69	ND	ND	ND	28.1	39.9
SB3	2	12/17/15	ND	ND	39.6	ND	ND	5.93	4.76	7.69	ND	ND	ND	3.68	ND	ND	ND	19.4	33.6
	4	12/17/15	ND	ND	32.0	ND	ND	5.96	4.97	5.22	ND	ND	ND	4.09	ND	ND	ND	29.4	38.9
SB4	2	12/17/15	ND	ND	44.5	ND	ND	6.52	3.69	8.59	6.55	ND	ND	4.54	ND	ND	ND	19.3	29.3
	4	12/17/15	ND	ND	20.2	ND	ND	3.88	3.13	2.90	ND	ND	ND	2.53	ND	ND	ND	19.7	22.4
SB5	2	12/17/15	ND	ND	30.1	ND	ND	6.21	3.64	4.60	ND	ND	ND	4.11	ND	ND	ND	18.3	28.7
	4	12/17/15	ND	ND	28.3	ND	ND	4.20	3.99	ND	ND	ND	ND	ND	ND	ND	ND	24.5	28.1
SB6	2	12/17/15	ND	ND	42.7	ND	ND	11.4	8.36	9.46	ND	ND	ND	8.01	ND	ND	ND	40.9	68.1
	4	12/17/15	ND	ND	40.9	ND	ND	4.68	3.71	3.59	ND	ND	ND	2.86	ND	ND	ND	24.5	30.1
SB7	2	12/17/15	ND	ND	37.2	ND	ND	7.19	3.82	4.28	ND	ND	ND	4.77	ND	ND	ND	27.9	29.2
	4	12/17/15	ND	ND	30.1	ND	ND	2.74	ND	ND	ND	ND	ND	ND	ND	ND	ND	15.8	19.0
SB8	2	12/17/15	ND	ND	64.9	ND	ND	4.28	4.45	11.5	3.05	ND	ND	3.97	ND	ND	ND	19.5	36.8
	4	12/17/15	ND	ND	29.1	ND	ND	3.55	2.77	4.08	ND	ND	ND	ND	ND	ND	ND	18.8	24.7
Maximum Concentration			-	4.44	92.7	-	-	11.4	8.36	11.5	6.55	-	-	8.01	-	-	-	46.1	68.1
CHHSL - residential			30	0.07	5,200	150	1.7	100,000	660	3,000	80	18	380	1,600	380	380	5	530	23,000
CHHSL - commercial/industrial			380	0.24	63,000	1700	7.5	100,000	3,200	38,000	320	180	4,800	16,000	4,800	4,800	63	670	100,000
RSL - residential			31	0.39	15,000	160	70	--	23	3,100	400	5.6	390	1,500	390	390	--	390	23,000
RSL - commercial/industrial			410	1.6	190,000	2000	810	--	300	41,000	800	34	5,100	20,000	5,100	5,100	--	5200	310,000

Samples analyzed in accordance with EPA Method 6010B

bgs below ground surface

^ = Reported concentration analyzed in accordance with EPA Method 7471A

ND Not detected above the method detection limit (MDL)

mg/kg milligrams per kilogram

CHHSL California Human Health Screening level

Table 2
Summary of Analytical Results - Organics in Soil
 LADPW - Mira Loma Women's Village
 45100 60th Street West
 Lancaster, California

Boring Location	Depth (feet bgs)	Date	Total Petroleum Hydrocarbons (mg/kg)			VOCs (ug/kg)
			Gasoline (C4-C12)	Diesel (C13-C22)	Oil (C23-C40)	All VOCs
SB1	2	12/17/15	ND	ND	ND	ND
	5	12/17/15	ND	ND	ND	ND
	10	12/17/15	ND	ND	ND	ND
SB2	2	12/17/15	ND	ND	ND	ND
	5	12/17/15	ND	ND	ND	ND
	10	12/17/15	ND	ND	ND	ND
SB3	2	12/17/15	ND	ND	ND	ND
	4	12/17/15	ND	ND	ND	ND
SB4	2	12/17/15	ND	ND	38.5	ND
	4	12/17/15	ND	ND	ND	ND
SB5	2	12/17/15	ND	ND	ND	ND
	4	12/17/15	ND	ND	ND	ND
SB6	2	12/17/15	ND	ND	ND	ND
	4	12/17/15	ND	ND	8.85	ND
SB7	2	12/17/15	ND	120	1,040	ND
	4	12/17/15	ND	ND	ND	ND
SB8	2	12/17/15	ND	ND	6.13	ND
	4	12/17/15	ND	ND	ND	ND
Maximum Concentration			-	120	1,040	-
RSL - residential			82	110	2,500	-
RSL - commercial/industrial			420	600	33,000	-
Maximum Soil Screening Level			500	1,000	10,000	-

mg/kg milligrams per kilogram

ug/kg micrograms per kilogram

bgs below ground surface

ND Not detected above the method detection limit (MDL)

RSL Regional Screenin Level

VOCs Volatile Organic Compounds

Geophysical Survey Report

Appendix A



**GEOPHYSICAL EVALUATION
MIRA LOMA DETENTION CENTER
LANCASTER, CALIFORNIA**

PREPARED FOR:

Converse Consultants
3176 Pullman Street, Suite 108
Costa Mesa, CA 92626

PREPARED BY:

Southwest Geophysics, Inc.
8057 Raytheon Road, Suite 9
San Diego, CA 92111

December 31, 2015
Project No. 115607

December 31, 2015
Project No. 115607

Ms. Laura Tanaka
Converse Consultants
3176 Pullman Street, Suite 108
Costa Mesa, CA 92626

Subject: Geophysical Evaluation
Mira Loma Detention Center
Lancaster, California

Dear Ms. Tanaka:

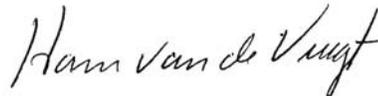
In accordance with your authorization, we are pleased to submit this data report pertaining to our geophysical evaluation for a portion of the Mira Loma Detention Center located at 45100 60th Street West in Lancaster, California. The purpose of our evaluation was to assess the limits of the backfilled excavation associated with the onsite fuel tanks and the presence of detectable underground piping and utilities in the study area. Our services were conducted on December 14, 2015. This report presents the survey methodology, equipment used, analysis, and results from our study.

We appreciate the opportunity to be of service on this project. Should you have any questions please contact the undersigned at your convenience.

Sincerely,
SOUTHWEST GEOPHYSICS, INC.



Aaron T. Puente
Project Geologist/Geophysicist



Hans van de Vrugt, C.E.G., P.Gp.
Principal Geologist/Geophysicist

ATP/HV/hv

Distribution: Addressee (electronic)



TABLE OF CONTENTS

	<u>Page</u>
1. INTRODUCTION	1
2. SCOPE OF SERVICES	1
3. SITE DESCRIPTION	1
4. GEOPHYSICAL INSTRUMENTATION AND APPLICATIONS	1
5. SURVEY METHODOLOGY	3
6. RESULTS AND CONCLUSIONS	4
7. LIMITATIONS.....	4

Figures

- Figure 1 – Site Location Map
- Figure 2 – Site Data Map
- Figure 3 – Site Photographs

1. INTRODUCTION

In accordance with your authorization, we are pleased to submit this data report pertaining to our geophysical evaluation for a portion of the Mira Loma Detention Center located at 45100 60th Street West in Lancaster, California (Figure 1). The purpose of our evaluation was to assess the limits of the backfilled excavation associated with the onsite fuel tanks and the presence of detectable underground piping and utilities in the study area. Our services were conducted on December 14, 2015. This report presents the survey methodology, equipment used, analysis, and results from our study.

2. SCOPE OF SERVICES

Our scope of services included:

- Performance of a geophysical survey at the subject site. Our survey included the use of a Geonics model EM61 MK2 time domain instrument, GSSI SIR 3000 Ground Penetrating Radar (GPR) unit using a 400 MHz transducer, Schonstedt GA-52 magnetic gradiometer, Fisher M-Scope TW-6 pipe and cable locator, and RD8000 line tracer.
- Site reconnaissance including field mapping of surface structures at and near the survey area.
- Compilation and analysis of the data collected.
- Preparation of this report presenting our findings and conclusions.

3. SITE DESCRIPTION

The project site is located near the northeast corner of the intersection between 60th Street West and West Avenue J in Lancaster, California (Figure 1). The subject property is currently used as a detention center facility which includes several buildings and associated improvements. Our study area consisted of an active gasoline fueling station. Figures 2 and 3 depict the general site conditions in the study area.

4. GEOPHYSICAL INSTRUMENTATION AND APPLICATIONS

Our evaluation included the use of a Geonics model EM61, GSSI SIR 3000 GPR, Schonstedt, model GA-52C magnetic gradiometer, Fisher M-Scope TW-6 pipe and cable locator, and

RD8000 line tracer. These instruments provide real-time results and facilitate the delineation of subsurface features.

The EM61 instrument is a high resolution, time-domain device for detecting buried conductive objects. It consists of a powerful transmitter that generates a pulsed primary magnetic field when its coils are energized, which induces eddy currents in nearby conductive objects. The decay of the eddy currents, following the input pulse, is measured by the coils, which in turn serve as receiver coils. The decay rate is measured for two coils, mounted concentrically, one above the other. By making the measurements at a relatively long time interval (measured in milliseconds) after termination of the primary pulse, the response is nearly independent of the electrical conductivity of the ground. Thus, the instrument is a super-sensitive metal detector. Due to its unique coil arrangement, the response curve is a single well-defined positive peak directly over a buried conductive object. This facilitates quick and accurate location of targets. Conductive objects to a depth of approximately 11 feet generally can be detected.

The GPR instrument beams energy into the ground from its transducer/antenna, in the form of electromagnetic waves. A portion of this energy is reflected back to the antenna at boundaries in the subsurface across which there are an electrical contrast. The recorder continuously makes a record of the reflected energy as the antenna is moved across the ground surface. The greater the electrical contrast, the higher the amplitude of the returned energy. The EM wave travels at a velocity unique to the material properties of the ground being studied, and when these velocities are known, or closely estimated from ground conductivity values and other information, two-way travel times can be converted to depth. Penetration into the ground and resolution of the GPR images produced are a function of ground electrical conductivity and dielectric constant. Images tend to be graphic, even at considerable depth, in sandy soils, but penetration and resolution may be limited in more conductive clayey moist ground.

The magnetic gradiometer has two fluxgate magnetic fixed sensors that are passed closely to and over the ground. When not in close proximity to a magnetic object, that is, only in the earth's field, the instrument emits an audible signal at a low frequency. When the instrument passes over

buried iron or steel objects (so that the field is significantly different at the two sensors) the frequency of the emitted sound increases. Frequency is a function of the gradient between the two sensors.

The M-Scope TW-6 device energizes the ground by producing an alternating primary magnetic field with alternating current (AC) in the transmitting coil. If conducting materials (including soils) are within the area of influence of the primary field, AC eddy currents are induced to flow in the conductors. A receiving coil senses the secondary magnetic field produced by these eddy currents, and outputs an audio response. The strength of the secondary field is a function of the conductivity of the object, its size, and its depth and position relative to the instrument's two coils. Conductive objects to a depth of approximately 10 feet are sensed. Also the device is somewhat focused, that is, it is more sensitive to conductors below (and above) the instrument, than to conductors off to the side.

Where risers are present, the RD8000 utility locator transmitter can be connected to the object, and a current is impressed on the conductor pipe or cable. The receiver unit is tuned to this same frequency, and it is used to trace the pipe's surface projection away from the riser. The transmitter and receiver can also be used in a non-connect (induction) mode, whereby the transmitter is positioned on the ground and an electromagnetic signal is emitted. In the presence of buried metal pipes and wires, a discrete signal will be induced on the conductor which can be sensed by the receiver. In addition, the instrument may be used in the passive mode, whereby radio and 60 Hz electromagnetic signals produced by communication and live electric lines are detected.

5. SURVEY METHODOLOGY

Traverses with the EM61, M-Scope, gradiometer and GPR were conducted along roughly north-south profile lines spaced 5 feet apart across accessible portions of the study area. The data were evaluated in real-time. The line tracer was used in both passive, direct connect and inductive modes to delineate the presence of underground lines in the study area. Detected features/lines were marked on the ground surface with paint, mapped and reported to you.

6. RESULTS AND CONCLUSIONS

As previously discussed, the purpose of our evaluation was to assess the limits of the backfilled excavation associated with the onsite fuel tanks and the presence of detectable underground piping and utilities in the study area. The results of our field survey did reveal the extent of the backfill associated with the underground fuel tank pit. In addition, numerous underground lines including product and vent lines were detected. Figures 2 and 3 present the results of our survey.

Our survey utilized industry standard equipment (i.e., GPR, electromagnetic, and magnetic instruments) and was conducted in general accordance with current practice. It should be noted, however, that the presence of existing structures and surface objects (i.e., bollards, building elements, etc.) potentially limited the survey. Where obstructions were present subsurface data could not be collected. Moreover, EM/magnetic responses produced by metal surface objects and underground lines can potentially obscure subsurface features. Figures 2 and 3 present the general site conditions and some of the obstructions encountered. Additionally, radar penetration was on the order of 2 to 3 feet below the ground surface; therefore, objects below this depth would not have been detected with GPR.

7. LIMITATIONS

The field evaluation and geophysical analyses presented in this report have been conducted in general accordance with current practice and the standard of care exercised by consultants performing similar tasks in the project area. No warranty, express or implied, is made regarding the conclusions and opinions presented in this report. There is no evaluation detailed enough to reveal every subsurface condition. Variations may exist and conditions not observed or described in this report may be present. Uncertainties relative to subsurface conditions can be reduced through additional subsurface surveying and/or exploration. Additional subsurface surveying can be performed upon request.

Please also note that our evaluation was limited to evaluating the presence of backfill associated with the existing underground fuels tanks and detectable underground lines. “USA” or “Dig Alert” should also be contacted prior to conducting subsurface exploration activities. In addition,

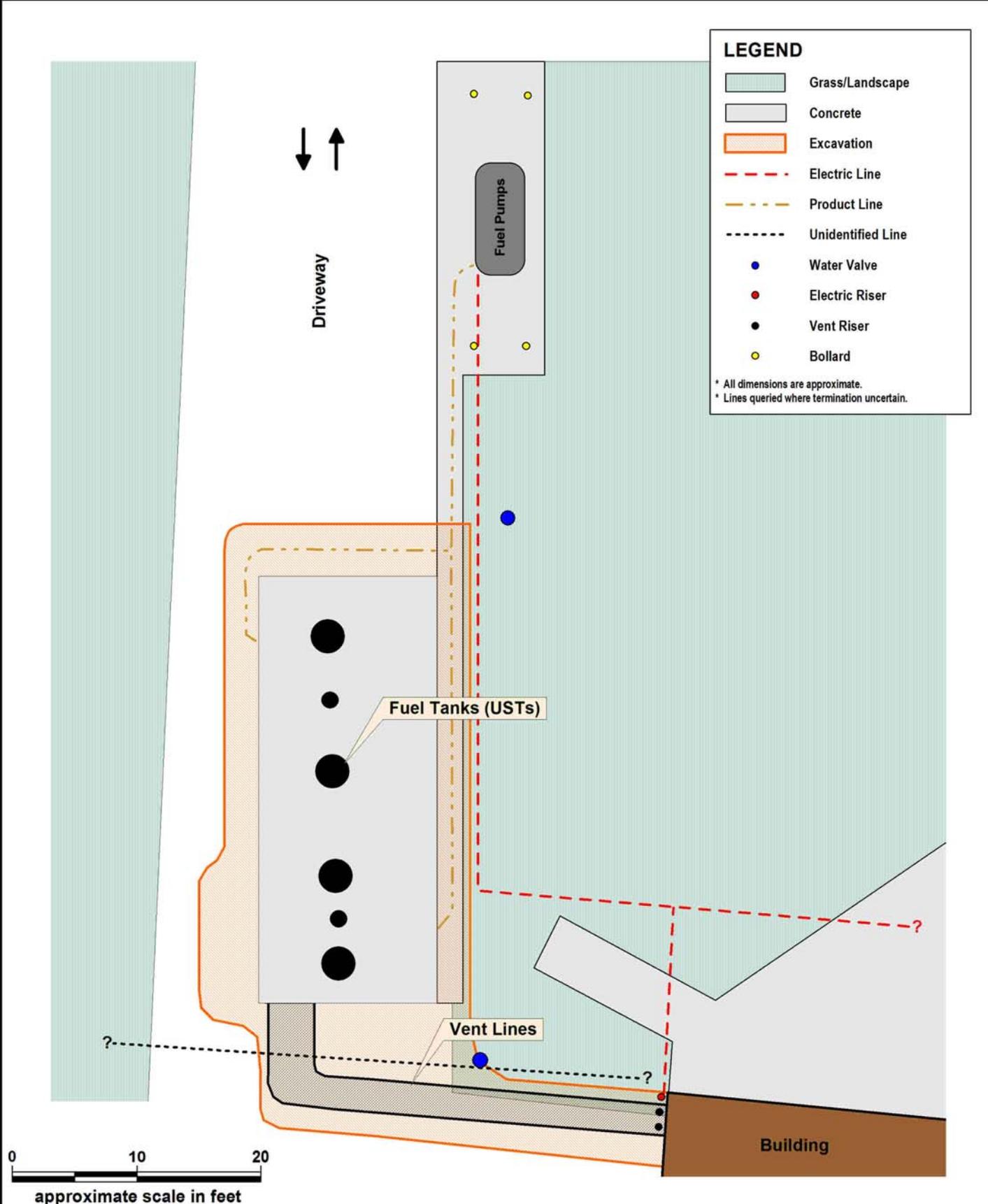
we recommend that available utility plans/drawings of the project site be reviewed as appropriate.

This document is intended to be used only in its entirety. No portion of the document, by itself, is designed to completely represent any aspect of the project described herein. Southwest Geophysics, Inc. should be contacted if the reader requires additional information or has questions regarding the content, interpretations presented, or completeness of this document. This report is intended exclusively for use by the client. Any use or reuse of this report by parties other than the client is undertaken at said parties' sole risk.

LEGEND

-  Grass/Landscape
-  Concrete
-  Excavation
-  Electric Line
-  Product Line
-  Unidentified Line
-  Water Valve
-  Electric Riser
-  Vent Riser
-  Bollard

* All dimensions are approximate.
* Lines queried where termination uncertain.



SITE DATA MAP



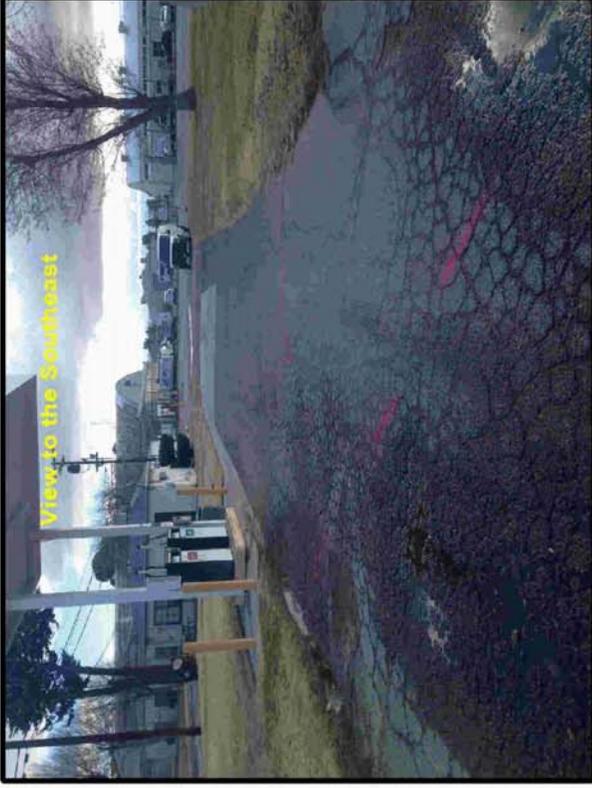
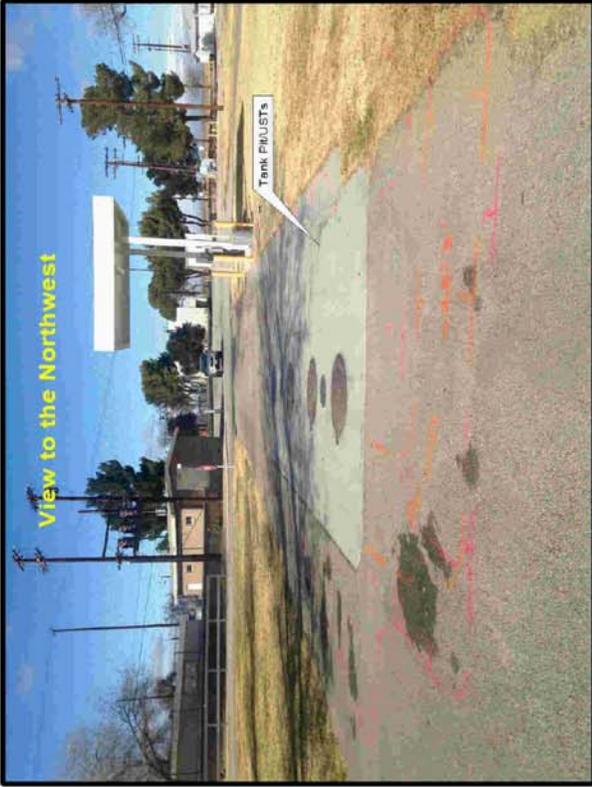
Mira Loma Detention Facility
Lancaster, California

Project No.: 115607

Date: 12/15



Figure 2



SITE PHOTOGRAPHS

Mira Loma Detention Facility
Lancaster, California

Project No.: 115607

Date: 12/15



Figure 3

Appendix B



Log of Boring No. SB-1

Dates Drilled: 12/17/2015 Logged by: SDW Checked By: MWF
 Equipment: GEOPROBE Driving Weight and Drop: N/A
 Ground Surface Elevation (ft): N/A Depth to Water (ft): NOT ENCOUNTERED

Depth (ft)	Graphic Log	SUMMARY OF SUBSURFACE CONDITIONS This log is part of the report prepared by Converse for this project and should be read together with the report. This summary applies only at the location of the boring and at the time of drilling. Subsurface conditions may differ at other locations and may change at this location with the passage of time. The data presented is a simplification of actual conditions encountered.	SAMPLES		BLOWS/FOOT	OTHER
			DRIVE	BULK		
5		SILTY SAND (SM): brown, very fine to fine, slightly moist, moderately sorted. -light brown, minor clay	X		0.0	
10		-moist, increased clay	X		0.0	
15		Total Depth = 15 feet. Borehole backfilled with hydrated bentonite.	X		0.0	



Converse Consultants

Project Name

Project No. 12-41-290-07 Drawing No. SB-1

Log of Boring No. SB-2

Dates Drilled: 12/17/2015 Logged by: SDW Checked By: MWF

Equipment: GEOPROBE Driving Weight and Drop: N/A

Ground Surface Elevation (ft): N/A Depth to Water (ft): NOT ENCOUNTERED

Depth (ft)	Graphic Log	SUMMARY OF SUBSURFACE CONDITIONS <small>This log is part of the report prepared by Converse for this project and should be read together with the report. This summary applies only at the location of the boring and at the time of drilling. Subsurface conditions may differ at other locations and may change at this location with the passage of time. The data presented is a simplification of actual conditions encountered.</small>	SAMPLES		BLOWS/FOOT	OTHER
			DRIVE	BULK		
5		SILTY SAND (SM): brown, very fine to fine, slightly moist, moderately sorted.	X		0.0	
		-light brown, minor clay	X		0.0	
10		-moist, increased clay	X		0.0	
15		Total Depth = 15 feet. Borehole backfilled with hydrated bentonite.	X		0.0	



Converse Consultants

Project Name

Project No. 12-41-290-07 Drawing No. SB-2

Log of Boring No. SB-3

Dates Drilled: 12/17/2015 Logged by: SDW Checked By: MWF

Equipment: GEOPROBE Driving Weight and Drop: N/A

Ground Surface Elevation (ft): N/A Depth to Water (ft): NOT ENCOUNTERED

Depth (ft)	Graphic Log	SUMMARY OF SUBSURFACE CONDITIONS <small>This log is part of the report prepared by Converse for this project and should be read together with the report. This summary applies only at the location of the boring and at the time of drilling. Subsurface conditions may differ at other locations and may change at this location with the passage of time. The data presented is a simplification of actual conditions encountered.</small>	SAMPLES		BLOWS/FOOT	OTHER
			DRIVE	BULK		
5		SAND (SW): light brown, very fine to coarse with some gravel, poorly sorted, dry.	X		0.0	
		CLAYEY SAND (SC): light brown, very fine to fine, moderately sorted, slightly moist.	X		0.0	
		<p>Total Depth = 8 feet. Borehole backfilled with hydrated bentonite.</p>	X		0.0	



Converse Consultants

Project Name

Project No. 12-41-290-07 Drawing No. SB-3

Log of Boring No. SB-4

Dates Drilled: 12/17/2015 Logged by: SDW Checked By: MWF

Equipment: GEOPROBE Driving Weight and Drop: N/A

Ground Surface Elevation (ft): N/A Depth to Water (ft): NOT ENCOUNTERED

Depth (ft)	Graphic Log	SUMMARY OF SUBSURFACE CONDITIONS <small>This log is part of the report prepared by Converse for this project and should be read together with the report. This summary applies only at the location of the boring and at the time of drilling. Subsurface conditions may differ at other locations and may change at this location with the passage of time. The data presented is a simplification of actual conditions encountered.</small>	SAMPLES		BLOWS/FOOT	OTHER
			DRIVE	BULK		
5		SILT (ML): light brown, minor very fine grained sand, dry, loose.	X		0.0	
		-slightly moist	X		0.0	
	█	SAND (SP): tan, very fine to fine, moderately sorted, dry.	X		0.0	
		Total Depth = 8 feet. Borehole backfilled with hydrated bentonite.				



Converse Consultants

Project Name

Project No.
12-41-290-07

Drawing No.
SB-4

Log of Boring No. SB-5

Dates Drilled: 12/17/2015 Logged by: SDW Checked By: MWF

Equipment: GEOPROBE Driving Weight and Drop: N/A

Ground Surface Elevation (ft): N/A Depth to Water (ft): NOT ENCOUNTERED

Depth (ft)	Graphic Log	SUMMARY OF SUBSURFACE CONDITIONS <small>This log is part of the report prepared by Converse for this project and should be read together with the report. This summary applies only at the location of the boring and at the time of drilling. Subsurface conditions may differ at other locations and may change at this location with the passage of time. The data presented is a simplification of actual conditions encountered.</small>	SAMPLES		BLOWS/FOOT	OTHER
			DRIVE	BULK		
5		SILT (ML): light brown, minor very fine grained sand, dry, loose.	X		0.0	
		-slightly moist	X		0.0	
	█	SAND (SP): tan, very fine to fine, moderately sorted, dry.	X		0.0	
		Total Depth = 8 feet. Borehole backfilled with hydrated bentonite.				



Converse Consultants

Project Name

Project No. 12-41-290-07 Drawing No. SB-5

Log of Boring No. SB-6

Dates Drilled: 12/17/2015 Logged by: SDW Checked By: MWF

Equipment: GEOPROBE Driving Weight and Drop: N/A

Ground Surface Elevation (ft): N/A Depth to Water (ft): NOT ENCOUNTERED

Depth (ft)	Graphic Log	SUMMARY OF SUBSURFACE CONDITIONS <small>This log is part of the report prepared by Converse for this project and should be read together with the report. This summary applies only at the location of the boring and at the time of drilling. Subsurface conditions may differ at other locations and may change at this location with the passage of time. The data presented is a simplification of actual conditions encountered.</small>	SAMPLES		BLOWS/FOOT	OTHER
			DRIVE	BULK		
5		CLAYEY SILT (ML): light brown, trace very fine grained sand, dry, stiff.	X		0.0	
		SILT (ML): light brown, minor clay and very fine grained sand, dry, slightly stiff to loose.	X		0.0	
				X		0.0
		Total Depth = 8 feet. Borehole backfilled with hydrated bentonite.				



Converse Consultants

Project Name

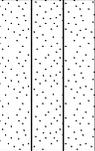
Project No. 12-41-290-07 Drawing No. SB-6

Log of Boring No. SB-7

Dates Drilled: 12/17/2015 Logged by: SDW Checked By: MWF

Equipment: GEOPROBE Driving Weight and Drop: N/A

Ground Surface Elevation (ft): N/A Depth to Water (ft): NOT ENCOUNTERED

Depth (ft)	Graphic Log	SUMMARY OF SUBSURFACE CONDITIONS <small>This log is part of the report prepared by Converse for this project and should be read together with the report. This summary applies only at the location of the boring and at the time of drilling. Subsurface conditions may differ at other locations and may change at this location with the passage of time. The data presented is a simplification of actual conditions encountered.</small>	SAMPLES		BLOWS/FOOT	OTHER
			DRIVE	BULK		
5		SANDY CLAY (CL): brown, dry, moderately stiff, very fine to fine grained sand.	X		0.0	
		SILTY SAND (SM): yellowish brown, very fine grained, moderately sorted, dry. -brown, minor clay	X		0.0	
		Total Depth = 8 feet. Borehole backfilled with hydrated bentonite.	X		0.0	



Converse Consultants

Project Name

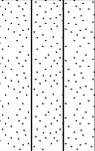
Project No. 12-41-290-07 Drawing No. SB-7

Log of Boring No. SB-8

Dates Drilled: 12/17/2015 Logged by: SDW Checked By: MWF

Equipment: GEOPROBE Driving Weight and Drop: N/A

Ground Surface Elevation (ft): N/A Depth to Water (ft): NOT ENCOUNTERED

Depth (ft)	Graphic Log	SUMMARY OF SUBSURFACE CONDITIONS <small>This log is part of the report prepared by Converse for this project and should be read together with the report. This summary applies only at the location of the boring and at the time of drilling. Subsurface conditions may differ at other locations and may change at this location with the passage of time. The data presented is a simplification of actual conditions encountered.</small>	SAMPLES		BLOWS/FOOT	OTHER
			DRIVE	BULK		
5		SANDY CLAY (CL): brown, dry, moderately stiff, very fine to fine grained sand.	X		0.0	
		SILTY SAND (SM): yellowish brown, very fine grained, moderately sorted, dry. -brown, minor clay	X		0.0	
		Total Depth = 8 feet. Borehole backfilled with hydrated bentonite.	X		0.0	



Converse Consultants

Project Name

Project No. 12-41-290-07 Drawing No. SB-8

Laboratory Analytical Report

Appendix C





American Environmental Testing Laboratory Inc.

2834 & 2908 North Naomi Street Burbank, CA 91504 • DOHS NO: 1541, LACSD NO: 10181
Tel: (888) 288-AETL • (818) 845-8200 • Fax: (818) 845-8840 • www.aetlab.com

Ordered By

Converse Consultants
222 E. Huntington Drive Suite 211
Monrovia, CA 91016-8006

Number of Pages 37
Date Received 12/17/2015
Date Reported 12/29/2015

Telephone: (626)930-1200
Attention: Laura Tanaka

Job Number	Order Date	Client
79442	12/17/2015	CONVRS

Project ID: 12-41-290-07
Project Name: Mira Loma Detention Center
Site: 45100 60th Street West
Lancaster, CA 93536

Enclosed please find results of analyses of 18 soil samples which were analyzed as specified on the attached chain of custody. If there are any questions, please do not hesitate to call.

Checked By: _____

Approved By: _____

Cyrus Razmara, Ph.D.
Laboratory Director



American Environmental Testing Laboratory Inc.

2834 & 2908 North Naomi Street, Burbank, CA 91504 • DOHS NO: 1541, LACSD NO: 10181
Tel: (888) 288-AETL • (818) 845-8200 • Fax: (818) 845-8840 • www.aetlab.com

CHAIN OF CUSTODY RECORD

No 94832

COMPANY Converse PROJECT MANAGER LAT/MVF

COMPANY ADDRESS 3176 Pullman St #108 PHONE 626 930-1200

PROJECT NAME Mira Loma Detention Center PROJECT # 12-41-290-02

SITE NAME 45100 60th St West PO # 12-41-290-02

AND ADDRESS Lancaster CA

AETL JOB No. 79442

Page 1 of 2

SAMPLE ID	LAB ID	DATE	TIME	MATRIX	CONTAINER NUMBER/SIZE	PRES.	ANALYSIS REQUESTED			TEST INSTRUCTIONS & COMMENTS
							8015 M	6010 B / 7171 A	8260 B	
1	SB1-2	79442.01	12/17/15	8:00	SOIL	Sleeve/enor ice	X	X	X	
2	-5	79442.02	8:05				X	X	X	
3	-10	79442.03	8:10				X	X	X	
4	-15	79442.04	8:15				X	X	X	
5	SB2-2	79442.05	8:35				X	X	X	Hold
6	-5	79442.06	8:40				X	X	X	
7	-10	79442.07	8:45				X	X	X	
8	-15	79442.08	8:50				X	X	X	Hold
9	SB3-2	79442.09	9:05				X	X	X	
10	-4	79442.10	9:10				X	X	X	
11	-8	79442.11	9:15				X	X	X	Hold
12	SB4-2	79442.12	9:25				X	X	X	
13	-4	79442.13	9:30				X	X	X	
14	-8	79442.14	9:35				X	X	X	Hold
15	SB5-2	79442.15	10:05				X	X	X	

SAMPLE RECEIPT - TO BE FILLED BY LABORATORY

TOTAL NUMBER OF CONTAINERS 30 PROPERLY COOLED Y / N / NA

CUSTODY SEALS Y (N) / NA SAMPLES INTACT Y / N / NA

RECEIVED IN GOOD COND. Y / N SAMPLES ACCEPTED Y / N

TURN AROUND TIME

NORMAL RUSH SAME DAY NEXT DAY 2 DAYS 3 DAYS

DATA DELIVERABLE REQUIRED

HARD COPY PDF GEOTRACKER (GLOBAL ID) OTHER (PLEASE SPECIFY) _____

RELINQUISHED BY: 1. Signature: [Signature] Printed Name: Spencer Wegner Date: 12/17/15 Time: 1240

RELINQUISHED BY: 2. Signature: _____ Printed Name: _____ Date: _____ Time: _____

RELINQUISHED BY: 3. Signature: _____ Printed Name: _____ Date: _____ Time: _____

RECEIVED BY: 1. Signature: _____ Printed Name: _____ Date: _____ Time: _____

RECEIVED BY: 2. Signature: [Signature] Printed Name: Atin Date: 12/17/15 Time: 1240

RECEIVED BY: 3. Signature: _____ Printed Name: _____ Date: _____ Time: _____

DISTRIBUTION: WHITE - Laboratory, CANARY - Laboratory, PINK - Project/Account Manager, YELLOW - Sampler/Originator



American Environmental Testing Laboratory Inc.

2834 & 2908 North Naomi Street Burbank, CA 91504 • DOHS NO: 1541, LACSD NO: 10181

Tel: (888) 288-AETL • (818) 845-8200 • Fax: (818) 845-8840 • www.aetlab.com

Page: 1 A

Ordered By

Converse Consultants
222 E. Huntington Drive Suite 211
Monrovia, CA 91016-8006

Project ID: 12-41-290-07
Date Received 12/17/2015
Date Reported 12/29/2015

Telephone: (626) 930-1200
Attention: Laura Tanaka

Job Number	Order Date	Client
79442	12/17/2015	CONVRS

CERTIFICATE OF ANALYSIS CASE NARRATIVE

AETL received 26 samples with the following specification on 12/17/2015.

Lab ID	Sample ID	Sample Date	Matrix	Quantity	Of Containers
79442.01	SB1-2	12/17/2015	Soil	2	
79442.02	SB1-5	12/17/2015	Soil	2	
79442.03	SB1-10	12/17/2015	Soil	2	
79442.05	SB2-2	12/17/2015	Soil	2	
79442.06	SB2-5	12/17/2015	Soil	2	
79442.07	SB2-10	12/17/2015	Soil	2	
79442.09	SB3-2	12/17/2015	Soil	2	
79442.10	SB3-4	12/17/2015	Soil	2	
79442.12	SB4-2	12/17/2015	Soil	2	
79442.13	SB4-4	12/17/2015	Soil	2	
79442.15	SB5-2	12/17/2015	Soil	2	
79442.16	SB5-4	12/17/2015	Soil	2	
79442.18	SB6-2	12/17/2015	Soil	2	
79442.19	SB6-4	12/17/2015	Soil	2	
79442.21	SB7-2	12/17/2015	Soil	2	
79442.22	SB7-4	12/17/2015	Soil	2	
79442.24	SB8-2	12/17/2015	Soil	2	
79442.25	SB8-4	12/17/2015	Soil	2	
Method	Submethod	Req Date	Priority	TAT	Units
	(6010B/7000CAM)	12/24/2015	2	Normal	mg/Kg
	(8260B)	12/24/2015	2	Normal	ug/Kg
	(M8015D) ^ C13-C40	12/24/2015	2	Normal	mg/Kg
	(M8015G)	12/24/2015	2	Normal	mg/Kg
79442.04	SB1-15	12/17/2015	Soil	2	
79442.08	SB2-15	12/17/2015	Soil	2	

Continued



American Environmental Testing Laboratory Inc.

2834 & 2908 North Naomi Street Burbank, CA 91504 • DOHS NO: 1541, LACSD NO: 10181

Tel: (888) 288-AETL • (818) 845-8200 • Fax: (818) 845-8840 • www.aetlab.com

Page: 1 B

Ordered By

Converse Consultants
222 E. Huntington Drive Suite 211
Monrovia, CA 91016-8006

Project ID: 12-41-290-07
Date Received 12/17/2015
Date Reported 12/29/2015

Telephone: (626) 930-1200
Attention: Laura Tanaka

Job Number	Order Date	Client
79442	12/17/2015	CONVRS

CERTIFICATE OF ANALYSIS

CASE NARRATIVE

79442.11	SB3-8	12/17/2015	Soil	2
79442.14	SB4-8	12/17/2015	Soil	2
79442.17	SB5-8	12/17/2015	Soil	2
79442.20	SB6-8	12/17/2015	Soil	2
79442.23	SB7-8	12/17/2015	Soil	2
79442.26	SB8-8	12/17/2015	Soil	2

Method ^ Submethod	Req Date	Priority	TAT	Units
ARCHIVE	12/24/2015	2	Normal	--

The samples were analyzed as specified on the enclosed chain of custody. Analytical non-conformances have been noted on the report.

Unless otherwise noted, all results of soil and solid samples are based on wet weight.

Checked By: 

Approved By: 

Cyrus Razmara, Ph.D.
Laboratory Director



American Environmental Testing Laboratory Inc.

2834 & 2908 North Naomi Street Burbank, CA 91504 • DOHS NO: 1541, LACSD NO: 10181
 Tel: (888) 288-AETL • (818) 845-8200 • Fax: (818) 845-8840 • www.aetlab.com

ANALYTICAL RESULTS

Ordered By

Converse Consultants
 222 E. Huntington Drive
 Suite 211
 Monrovia, CA 91016-8006

Site

45100 60th Street West
 Lancaster, CA 93536

Telephone: (626)930-1200

Attn: Laura Tanaka

Page: 2

Project ID: 12-41-290-07

Project Name: Mira Loma Detention Center

AETL Job Number	Submitted	Client
79442	12/17/2015	CONVRS

Method: (8260B), Volatile Organic Compounds by GC/MS (SW846)

QC Batch No: 1223152A1

Our Lab I.D.			Method Blank	79442.01	79442.02	79442.03	79442.05
Client Sample I.D.				SB1-2	SB1-5	SB1-10	SB2-2
Date Sampled				12/17/2015	12/17/2015	12/17/2015	12/17/2015
Date Prepared			12/23/2015	12/23/2015	12/23/2015	12/23/2015	12/23/2015
Preparation Method			5030	5035A	5035A	5035A	5035A
Date Analyzed			12/23/2015	12/23/2015	12/23/2015	12/23/2015	12/23/2015
Matrix			Soil	Soil	Soil	Soil	Soil
Units			ug/Kg	ug/Kg	ug/Kg	ug/Kg	ug/Kg
Dilution Factor			1	1	1	1	1
Analytes	MDL	PQL	Results	Results	Results	Results	Results
Acetone	25	50	ND	ND	ND	ND	ND
Benzene	1.0	10.0	ND	ND	ND	ND	ND
Bromobenzene (Phenyl bromide)	5.0	10.0	ND	ND	ND	ND	ND
Bromochloromethane	5.0	10.0	ND	ND	ND	ND	ND
Bromodichloromethane	5.0	10.0	ND	ND	ND	ND	ND
Bromoform (Tribromomethane)	25	50	ND	ND	ND	ND	ND
Bromomethane (Methyl bromide)	15	30	ND	ND	ND	ND	ND
2-Butanone (MEK)	25	50	ND	ND	ND	ND	ND
n-Butylbenzene	5.0	10.0	ND	ND	ND	ND	ND
sec-Butylbenzene	5.0	10.0	ND	ND	ND	ND	ND
tert-Butylbenzene	5.0	10.0	ND	ND	ND	ND	ND
Carbon Disulfide	25	50	ND	ND	ND	ND	ND
Carbon tetrachloride	5.0	10.0	ND	ND	ND	ND	ND
Chlorobenzene	5.0	10.0	ND	ND	ND	ND	ND
Chloroethane	15	30	ND	ND	ND	ND	ND
2-Chloroethyl vinyl ether	50	50	ND	ND	ND	ND	ND
Chloroform (Trichloromethane)	5.0	10.0	ND	ND	ND	ND	ND
Chloromethane (Methyl chloride)	15	30	ND	ND	ND	ND	ND
2-Chlorotoluene	5.0	10.0	ND	ND	ND	ND	ND
4-Chlorotoluene	5.0	10.0	ND	ND	ND	ND	ND
1,2-Dibromo-3-chloropropane (DBCP)	25	50	ND	ND	ND	ND	ND
Dibromochloromethane	5.0	10.0	ND	ND	ND	ND	ND
1,2-Dibromoethane (EDB)	5.0	10.0	ND	ND	ND	ND	ND
Dibromomethane	5.0	10.0	ND	ND	ND	ND	ND
1,2-Dichlorobenzene	5.0	10.0	ND	ND	ND	ND	ND
1,3-Dichlorobenzene	5.0	10.0	ND	ND	ND	ND	ND
1,4-Dichlorobenzene	5.0	10.0	ND	ND	ND	ND	ND



American Environmental Testing Laboratory Inc.

2834 & 2908 North Naomi Street Burbank, CA 91504 • DOHS NO: 1541, LACSD NO: 10181

Tel: (888) 288-AETL • (818) 845-8200 • Fax: (818) 845-8840 • www.aetlab.com

ANALYTICAL RESULTS

Page: 3

Project ID: 12-41-290-07
 Project Name: Mira Loma Detention Center

AETL Job Number	Submitted	Client
79442	12/17/2015	CONVRS

Method: (8260B), Volatile Organic Compounds by GC/MS (SW846)

QC Batch No: 1223152A1

Our Lab I.D.		Method Blank	79442.01	79442.02	79442.03	79442.05	
Client Sample I.D.			SB1-2	SB1-5	SB1-10	SB2-2	
Date Sampled			12/17/2015	12/17/2015	12/17/2015	12/17/2015	
Date Prepared		12/23/2015	12/23/2015	12/23/2015	12/23/2015	12/23/2015	
Preparation Method		5030	5035A	5035A	5035A	5035A	
Date Analyzed		12/23/2015	12/23/2015	12/23/2015	12/23/2015	12/23/2015	
Matrix		Soil	Soil	Soil	Soil	Soil	
Units		ug/Kg	ug/Kg	ug/Kg	ug/Kg	ug/Kg	
Dilution Factor		1	1	1	1	1	
Analytes	MDL	PQL	Results	Results	Results	Results	Results
Dichlorodifluoromethane	15	30	ND	ND	ND	ND	ND
1,1-Dichloroethane	5.0	10.0	ND	ND	ND	ND	ND
1,2-Dichloroethane (EDC)	5.0	10.0	ND	ND	ND	ND	ND
1,1-Dichloroethene	5.0	10.0	ND	ND	ND	ND	ND
cis-1,2-Dichloroethene	5.0	10.0	ND	ND	ND	ND	ND
trans-1,2-Dichloroethene	5.0	10.0	ND	ND	ND	ND	ND
1,2-Dichloropropane	5.0	10.0	ND	ND	ND	ND	ND
1,3-Dichloropropane	5.0	10.0	ND	ND	ND	ND	ND
2,2-Dichloropropane	5.0	10.0	ND	ND	ND	ND	ND
1,1-Dichloropropene	5.0	10.0	ND	ND	ND	ND	ND
cis-1,3-Dichloropropene	5.0	10.0	ND	ND	ND	ND	ND
trans-1,3-Dichloropropene	5.0	10.0	ND	ND	ND	ND	ND
Ethylbenzene	1.0	10.0	ND	ND	ND	ND	ND
Hexachlorobutadiene	15	30	ND	ND	ND	ND	ND
2-Hexanone	25	50	ND	ND	ND	ND	ND
Iodomethane	5.0	10.0	ND	ND	ND	ND	ND
Isopropylbenzene	5.0	10.0	ND	ND	ND	ND	ND
p-Isopropyltoluene	5.0	10.0	ND	ND	ND	ND	ND
4-Methyl-2-pentanone (MIBK)	25	50	ND	ND	ND	ND	ND
Methyl-tert-butyl ether (MTBE)	2.0	10.0	ND	ND	ND	ND	ND
Methylene chloride (DCM)	25	50	ND	ND	ND	ND	ND
Naphthalene	5.0	10.0	ND	ND	ND	ND	ND
n-Propylbenzene	5.0	10.0	ND	ND	ND	ND	ND
Styrene	5.0	10.0	ND	ND	ND	ND	ND
1,1,1,2-Tetrachloroethane	5.0	10.0	ND	ND	ND	ND	ND
1,1,2,2-Tetrachloroethane	5.0	10.0	ND	ND	ND	ND	ND
Tetrachloroethene	2.0	10.0	ND	ND	ND	ND	ND
Toluene (Methyl benzene)	1.0	10.0	ND	ND	ND	ND	ND
1,2,3-Trichlorobenzene	5.0	10.0	ND	ND	ND	ND	ND
1,2,4-Trichlorobenzene	5.0	10.0	ND	ND	ND	ND	ND
1,1,1-Trichloroethane	5.0	10.0	ND	ND	ND	ND	ND
1,1,2-Trichloroethane	5.0	10.0	ND	ND	ND	ND	ND
Trichloroethene	1.5	10.0	ND	ND	ND	ND	ND
Trichlorofluoromethane	5.0	10.0	ND	ND	ND	ND	ND



American Environmental Testing Laboratory Inc.

2834 & 2908 North Naomi Street Burbank, CA 91504 • DOHS NO: 1541, LACSD NO: 10181
 Tel: (888) 288-AETL • (818) 845-8200 • Fax: (818) 845-8840 • www.aetlab.com

ANALYTICAL RESULTS

Page: 4

Project ID: 12-41-290-07
 Project Name: Mira Loma Detention Center

AETL Job Number	Submitted	Client
79442	12/17/2015	CONVRS

Method: (8260B), Volatile Organic Compounds by GC/MS (SW846)

QC Batch No: 1223152A1

Our Lab I.D.			Method Blank	79442.01	79442.02	79442.03	79442.05
Client Sample I.D.				SB1-2	SB1-5	SB1-10	SB2-2
Date Sampled				12/17/2015	12/17/2015	12/17/2015	12/17/2015
Date Prepared			12/23/2015	12/23/2015	12/23/2015	12/23/2015	12/23/2015
Preparation Method			5030	5035A	5035A	5035A	5035A
Date Analyzed			12/23/2015	12/23/2015	12/23/2015	12/23/2015	12/23/2015
Matrix			Soil	Soil	Soil	Soil	Soil
Units			ug/Kg	ug/Kg	ug/Kg	ug/Kg	ug/Kg
Dilution Factor			1	1	1	1	1
Analytes	MDL	PQL	Results	Results	Results	Results	Results
1,2,3-Trichloropropane	5.0	10.0	ND	ND	ND	ND	ND
1,2,4-Trimethylbenzene	5.0	10.0	ND	ND	ND	ND	ND
1,3,5-Trimethylbenzene	5.0	10.0	ND	ND	ND	ND	ND
Vinyl Acetate	25	50	ND	ND	ND	ND	ND
Vinyl chloride (Chloroethene)	5.0	10.0	ND	ND	ND	ND	ND
o-Xylene	1.0	10.0	ND	ND	ND	ND	ND
m,p-Xylenes	1.0	20.0	ND	ND	ND	ND	ND
Our Lab I.D.			Method Blank	79442.01	79442.02	79442.03	79442.05
Surrogates	%Rec.Limit		% Rec.	% Rec.	% Rec.	% Rec.	% Rec.
Bromofluorobenzene	75-125		77.1	93.3	94.8	92.1	95.9
Dibromofluoromethane	75-125		117	117	117	117	119
Toluene-d8	75-125		114	112	112	112	112



American Environmental Testing Laboratory Inc.

2834 & 2908 North Naomi Street Burbank, CA 91504 • DOHS NO: 1541, LACSD NO: 10181
 Tel: (888) 288-AETL • (818) 845-8200 • Fax: (818) 845-8840 • www.aetlab.com

ANALYTICAL RESULTS

Ordered By

Converse Consultants
 222 E. Huntington Drive
 Suite 211
 Monrovia, CA 91016-8006

Site

45100 60th Street West
 Lancaster, CA 93536

Telephone: (626)930-1200

Attn: Laura Tanaka

Page: 5

Project ID: 12-41-290-07

Project Name: Mira Loma Detention Center

AETL Job Number	Submitted	Client
79442	12/17/2015	CONVRS

Method: (8260B), Volatile Organic Compounds by GC/MS (SW846)

QC Batch No: 1223152A1

Our Lab I.D.			79442.06	79442.07	79442.09	79442.10	
Client Sample I.D.			SB2-5	SB2-10	SB3-2	SB3-4	
Date Sampled			12/17/2015	12/17/2015	12/17/2015	12/17/2015	
Date Prepared			12/23/2015	12/23/2015	12/23/2015	12/23/2015	
Preparation Method			5035A	5035A	5035A	5035A	
Date Analyzed			12/23/2015	12/23/2015	12/23/2015	12/23/2015	
Matrix			Soil	Soil	Soil	Soil	
Units			ug/Kg	ug/Kg	ug/Kg	ug/Kg	
Dilution Factor			1	1	1	1	
Analytes	MDL	PQL	Results	Results	Results	Results	
Acetone	25	50	ND	ND	ND	ND	
Benzene	1.0	10.0	ND	ND	ND	ND	
Bromobenzene (Phenyl bromide)	5.0	10.0	ND	ND	ND	ND	
Bromochloromethane	5.0	10.0	ND	ND	ND	ND	
Bromodichloromethane	5.0	10.0	ND	ND	ND	ND	
Bromoform (Tribromomethane)	25	50	ND	ND	ND	ND	
Bromomethane (Methyl bromide)	15	30	ND	ND	ND	ND	
2-Butanone (MEK)	25	50	ND	ND	ND	ND	
n-Butylbenzene	5.0	10.0	ND	ND	ND	ND	
sec-Butylbenzene	5.0	10.0	ND	ND	ND	ND	
tert-Butylbenzene	5.0	10.0	ND	ND	ND	ND	
Carbon Disulfide	25	50	ND	ND	ND	ND	
Carbon tetrachloride	5.0	10.0	ND	ND	ND	ND	
Chlorobenzene	5.0	10.0	ND	ND	ND	ND	
Chloroethane	15	30	ND	ND	ND	ND	
2-Chloroethyl vinyl ether	50	50	ND	ND	ND	ND	
Chloroform (Trichloromethane)	5.0	10.0	ND	ND	ND	ND	
Chloromethane (Methyl chloride)	15	30	ND	ND	ND	ND	
2-Chlorotoluene	5.0	10.0	ND	ND	ND	ND	
4-Chlorotoluene	5.0	10.0	ND	ND	ND	ND	
1,2-Dibromo-3-chloropropane (DBCP)	25	50	ND	ND	ND	ND	
Dibromochloromethane	5.0	10.0	ND	ND	ND	ND	
1,2-Dibromoethane (EDB)	5.0	10.0	ND	ND	ND	ND	
Dibromomethane	5.0	10.0	ND	ND	ND	ND	
1,2-Dichlorobenzene	5.0	10.0	ND	ND	ND	ND	
1,3-Dichlorobenzene	5.0	10.0	ND	ND	ND	ND	
1,4-Dichlorobenzene	5.0	10.0	ND	ND	ND	ND	



American Environmental Testing Laboratory Inc.

2834 & 2908 North Naomi Street Burbank, CA 91504 • DOHS NO: 1541, LACSD NO: 10181
 Tel: (888) 288-AETL • (818) 845-8200 • Fax: (818) 845-8840 • www.aetlab.com

ANALYTICAL RESULTS

Page: 6

Project ID: 12-41-290-07
 Project Name: Mira Loma Detention Center

AETL Job Number	Submitted	Client
79442	12/17/2015	CONVRS

Method: (8260B), Volatile Organic Compounds by GC/MS (SW846)

QC Batch No: 1223152A1

Our Lab I.D.			79442.06	79442.07	79442.09	79442.10	
Client Sample I.D.			SB2-5	SB2-10	SB3-2	SB3-4	
Date Sampled			12/17/2015	12/17/2015	12/17/2015	12/17/2015	
Date Prepared			12/23/2015	12/23/2015	12/23/2015	12/23/2015	
Preparation Method			5035A	5035A	5035A	5035A	
Date Analyzed			12/23/2015	12/23/2015	12/23/2015	12/23/2015	
Matrix			Soil	Soil	Soil	Soil	
Units			ug/Kg	ug/Kg	ug/Kg	ug/Kg	
Dilution Factor			1	1	1	1	
Analytes	MDL	PQL	Results	Results	Results	Results	
Dichlorodifluoromethane	15	30	ND	ND	ND	ND	
1,1-Dichloroethane	5.0	10.0	ND	ND	ND	ND	
1,2-Dichloroethane (EDC)	5.0	10.0	ND	ND	ND	ND	
1,1-Dichloroethene	5.0	10.0	ND	ND	ND	ND	
cis-1,2-Dichloroethene	5.0	10.0	ND	ND	ND	ND	
trans-1,2-Dichloroethene	5.0	10.0	ND	ND	ND	ND	
1,2-Dichloropropane	5.0	10.0	ND	ND	ND	ND	
1,3-Dichloropropane	5.0	10.0	ND	ND	ND	ND	
2,2-Dichloropropane	5.0	10.0	ND	ND	ND	ND	
1,1-Dichloropropene	5.0	10.0	ND	ND	ND	ND	
cis-1,3-Dichloropropene	5.0	10.0	ND	ND	ND	ND	
trans-1,3-Dichloropropene	5.0	10.0	ND	ND	ND	ND	
Ethylbenzene	1.0	10.0	ND	ND	ND	ND	
Hexachlorobutadiene	15	30	ND	ND	ND	ND	
2-Hexanone	25	50	ND	ND	ND	ND	
Iodomethane	5.0	10.0	ND	ND	ND	ND	
Isopropylbenzene	5.0	10.0	ND	ND	ND	ND	
p-Isopropyltoluene	5.0	10.0	ND	ND	ND	ND	
4-Methyl-2-pentanone (MIBK)	25	50	ND	ND	ND	ND	
Methyl-tert-butyl ether (MTBE)	2.0	10.0	ND	ND	ND	ND	
Methylene chloride (DCM)	25	50	ND	ND	ND	ND	
Naphthalene	5.0	10.0	ND	ND	ND	ND	
n-Propylbenzene	5.0	10.0	ND	ND	ND	ND	
Styrene	5.0	10.0	ND	ND	ND	ND	
1,1,1,2-Tetrachloroethane	5.0	10.0	ND	ND	ND	ND	
1,1,2,2-Tetrachloroethane	5.0	10.0	ND	ND	ND	ND	
Tetrachloroethene	2.0	10.0	ND	ND	ND	ND	
Toluene (Methyl benzene)	1.0	10.0	ND	ND	ND	ND	
1,2,3-Trichlorobenzene	5.0	10.0	ND	ND	ND	ND	
1,2,4-Trichlorobenzene	5.0	10.0	ND	ND	ND	ND	
1,1,1-Trichloroethane	5.0	10.0	ND	ND	ND	ND	
1,1,2-Trichloroethane	5.0	10.0	ND	ND	ND	ND	
Trichloroethene	1.5	10.0	ND	ND	ND	ND	
Trichlorofluoromethane	5.0	10.0	ND	ND	ND	ND	



American Environmental Testing Laboratory Inc.

2834 & 2908 North Naomi Street Burbank, CA 91504 • DOHS NO: 1541, LACSD NO: 10181
 Tel: (888) 288-AETL • (818) 845-8200 • Fax: (818) 845-8840 • www.aetlab.com

ANALYTICAL RESULTS

Page: 7

Project ID: 12-41-290-07
 Project Name: Mira Loma Detention Center

AETL Job Number	Submitted	Client
79442	12/17/2015	CONVRS

Method: (8260B), Volatile Organic Compounds by GC/MS (SW846)

QC Batch No: 1223152A1

Our Lab I.D.			79442.06	79442.07	79442.09	79442.10	
Client Sample I.D.			SB2-5	SB2-10	SB3-2	SB3-4	
Date Sampled			12/17/2015	12/17/2015	12/17/2015	12/17/2015	
Date Prepared			12/23/2015	12/23/2015	12/23/2015	12/23/2015	
Preparation Method			5035A	5035A	5035A	5035A	
Date Analyzed			12/23/2015	12/23/2015	12/23/2015	12/23/2015	
Matrix			Soil	Soil	Soil	Soil	
Units			ug/Kg	ug/Kg	ug/Kg	ug/Kg	
Dilution Factor			1	1	1	1	
Analytes	MDL	PQL	Results	Results	Results	Results	
1,2,3-Trichloropropane	5.0	10.0	ND	ND	ND	ND	
1,2,4-Trimethylbenzene	5.0	10.0	ND	ND	ND	ND	
1,3,5-Trimethylbenzene	5.0	10.0	ND	ND	ND	ND	
Vinyl Acetate	25	50	ND	ND	ND	ND	
Vinyl chloride (Chloroethene)	5.0	10.0	ND	ND	ND	ND	
o-Xylene	1.0	10.0	ND	ND	ND	ND	
m,p-Xylenes	1.0	20.0	ND	ND	ND	ND	
Our Lab I.D.			79442.06	79442.07	79442.09	79442.10	
Surrogates	%Rec.Limit		% Rec.	% Rec.	% Rec.	% Rec.	
Bromofluorobenzene	75-125		93.9	94.5	93.1	94.0	
Dibromofluoromethane	75-125		119	115	116	119	
Toluene-d8	75-125		112	112	111	111	



American Environmental Testing Laboratory Inc.

2834 & 2908 North Naomi Street Burbank, CA 91504 • DOHS NO: 1541, LACSD NO: 10181
 Tel: (888) 288-AETL • (818) 845-8200 • Fax: (818) 845-8840 • www.aetlab.com

ANALYTICAL RESULTS

Ordered By

Converse Consultants
 222 E. Huntington Drive
 Suite 211
 Monrovia, CA 91016-8006

Site

45100 60th Street West
 Lancaster, CA 93536

Telephone: (626)930-1200

Attn: Laura Tanaka

Page: 8

Project ID: 12-41-290-07

Project Name: Mira Loma Detention Center

AETL Job Number	Submitted	Client
79442	12/17/2015	CONVRS

Method: (8260B), Volatile Organic Compounds by GC/MS (SW846)

QC Batch No: 1224152A1

Our Lab I.D.		Method Blank	79442.12	79442.13	79442.15	79442.16	
Client Sample I.D.			SB4-2	SB4-4	SB5-2	SB5-4	
Date Sampled			12/17/2015	12/17/2015	12/17/2015	12/17/2015	
Date Prepared		12/24/2015	12/24/2015	12/24/2015	12/24/2015	12/24/2015	
Preparation Method		5030	5035A	5035A	5035A	5035A	
Date Analyzed		12/24/2015	12/24/2015	12/24/2015	12/24/2015	12/24/2015	
Matrix		Soil	Soil	Soil	Soil	Soil	
Units		ug/Kg	ug/Kg	ug/Kg	ug/Kg	ug/Kg	
Dilution Factor		1	1	1	1	1	
Analytes	MDL	PQL	Results	Results	Results	Results	Results
Acetone	25	50	ND	ND	ND	ND	ND
Benzene	1.0	10.0	ND	ND	ND	ND	ND
Bromobenzene (Phenyl bromide)	5.0	10.0	ND	ND	ND	ND	ND
Bromochloromethane	5.0	10.0	ND	ND	ND	ND	ND
Bromodichloromethane	5.0	10.0	ND	ND	ND	ND	ND
Bromoform (Tribromomethane)	25	50	ND	ND	ND	ND	ND
Bromomethane (Methyl bromide)	15	30	ND	ND	ND	ND	ND
2-Butanone (MEK)	25	50	ND	ND	ND	ND	ND
n-Butylbenzene	5.0	10.0	ND	ND	ND	ND	ND
sec-Butylbenzene	5.0	10.0	ND	ND	ND	ND	ND
tert-Butylbenzene	5.0	10.0	ND	ND	ND	ND	ND
Carbon Disulfide	25	50	ND	ND	ND	ND	ND
Carbon tetrachloride	5.0	10.0	ND	ND	ND	ND	ND
Chlorobenzene	5.0	10.0	ND	ND	ND	ND	ND
Chloroethane	15	30	ND	ND	ND	ND	ND
2-Chloroethyl vinyl ether	50	50	ND	ND	ND	ND	ND
Chloroform (Trichloromethane)	5.0	10.0	ND	ND	ND	ND	ND
Chloromethane (Methyl chloride)	15	30	ND	ND	ND	ND	ND
2-Chlorotoluene	5.0	10.0	ND	ND	ND	ND	ND
4-Chlorotoluene	5.0	10.0	ND	ND	ND	ND	ND
1,2-Dibromo-3-chloropropane (DBCP)	25	50	ND	ND	ND	ND	ND
Dibromochloromethane	5.0	10.0	ND	ND	ND	ND	ND
1,2-Dibromoethane (EDB)	5.0	10.0	ND	ND	ND	ND	ND
Dibromomethane	5.0	10.0	ND	ND	ND	ND	ND
1,2-Dichlorobenzene	5.0	10.0	ND	ND	ND	ND	ND
1,3-Dichlorobenzene	5.0	10.0	ND	ND	ND	ND	ND
1,4-Dichlorobenzene	5.0	10.0	ND	ND	ND	ND	ND



American Environmental Testing Laboratory Inc.

2834 & 2908 North Naomi Street Burbank, CA 91504 • DOHS NO: 1541, LACSD NO: 10181
 Tel: (888) 288-AETL • (818) 845-8200 • Fax: (818) 845-8840 • www.aetlab.com

ANALYTICAL RESULTS

Page: 9

Project ID: 12-41-290-07
 Project Name: Mira Loma Detention Center

AETL Job Number	Submitted	Client
79442	12/17/2015	CONVRS

Method: (8260B), Volatile Organic Compounds by GC/MS (SW846)

QC Batch No: 1224152A1

Our Lab I.D.		Method Blank	79442.12	79442.13	79442.15	79442.16	
Client Sample I.D.			SB4-2	SB4-4	SB5-2	SB5-4	
Date Sampled			12/17/2015	12/17/2015	12/17/2015	12/17/2015	
Date Prepared		12/24/2015	12/24/2015	12/24/2015	12/24/2015	12/24/2015	
Preparation Method		5030	5035A	5035A	5035A	5035A	
Date Analyzed		12/24/2015	12/24/2015	12/24/2015	12/24/2015	12/24/2015	
Matrix		Soil	Soil	Soil	Soil	Soil	
Units		ug/Kg	ug/Kg	ug/Kg	ug/Kg	ug/Kg	
Dilution Factor		1	1	1	1	1	
Analytes	MDL	PQL	Results	Results	Results	Results	Results
Dichlorodifluoromethane	15	30	ND	ND	ND	ND	ND
1,1-Dichloroethane	5.0	10.0	ND	ND	ND	ND	ND
1,2-Dichloroethane (EDC)	5.0	10.0	ND	ND	ND	ND	ND
1,1-Dichloroethene	5.0	10.0	ND	ND	ND	ND	ND
cis-1,2-Dichloroethene	5.0	10.0	ND	ND	ND	ND	ND
trans-1,2-Dichloroethene	5.0	10.0	ND	ND	ND	ND	ND
1,2-Dichloropropane	5.0	10.0	ND	ND	ND	ND	ND
1,3-Dichloropropane	5.0	10.0	ND	ND	ND	ND	ND
2,2-Dichloropropane	5.0	10.0	ND	ND	ND	ND	ND
1,1-Dichloropropene	5.0	10.0	ND	ND	ND	ND	ND
cis-1,3-Dichloropropene	5.0	10.0	ND	ND	ND	ND	ND
trans-1,3-Dichloropropene	5.0	10.0	ND	ND	ND	ND	ND
Ethylbenzene	1.0	10.0	ND	ND	ND	ND	ND
Hexachlorobutadiene	15	30	ND	ND	ND	ND	ND
2-Hexanone	25	50	ND	ND	ND	ND	ND
Iodomethane	5.0	10.0	ND	ND	ND	ND	ND
Isopropylbenzene	5.0	10.0	ND	ND	ND	ND	ND
p-Isopropyltoluene	5.0	10.0	ND	ND	ND	ND	ND
4-Methyl-2-pentanone (MIBK)	25	50	ND	ND	ND	ND	ND
Methyl-tert-butyl ether (MTBE)	2.0	10.0	ND	ND	ND	ND	ND
Methylene chloride (DCM)	25	50	ND	ND	ND	ND	ND
Naphthalene	5.0	10.0	ND	ND	ND	ND	ND
n-Propylbenzene	5.0	10.0	ND	ND	ND	ND	ND
Styrene	5.0	10.0	ND	ND	ND	ND	ND
1,1,1,2-Tetrachloroethane	5.0	10.0	ND	ND	ND	ND	ND
1,1,2,2-Tetrachloroethane	5.0	10.0	ND	ND	ND	ND	ND
Tetrachloroethene	2.0	10.0	ND	ND	ND	ND	ND
Toluene (Methyl benzene)	1.0	10.0	ND	ND	ND	ND	ND
1,2,3-Trichlorobenzene	5.0	10.0	ND	ND	ND	ND	ND
1,2,4-Trichlorobenzene	5.0	10.0	ND	ND	ND	ND	ND
1,1,1-Trichloroethane	5.0	10.0	ND	ND	ND	ND	ND
1,1,2-Trichloroethane	5.0	10.0	ND	ND	ND	ND	ND
Trichloroethene	1.5	10.0	ND	ND	ND	ND	ND
Trichlorofluoromethane	5.0	10.0	ND	ND	ND	ND	ND



American Environmental Testing Laboratory Inc.

2834 & 2908 North Naomi Street Burbank, CA 91504 • DOHS NO: 1541, LACSD NO: 10181
 Tel: (888) 288-AETL • (818) 845-8200 • Fax: (818) 845-8840 • www.aetlab.com

ANALYTICAL RESULTS

Page: 10

Project ID: 12-41-290-07
 Project Name: Mira Loma Detention Center

AETL Job Number	Submitted	Client
79442	12/17/2015	CONVRS

Method: (8260B), Volatile Organic Compounds by GC/MS (SW846)

QC Batch No: 1224152A1

Our Lab I.D.		Method Blank	79442.12	79442.13	79442.15	79442.16	
Client Sample I.D.			SB4-2	SB4-4	SB5-2	SB5-4	
Date Sampled			12/17/2015	12/17/2015	12/17/2015	12/17/2015	
Date Prepared		12/24/2015	12/24/2015	12/24/2015	12/24/2015	12/24/2015	
Preparation Method		5030	5035A	5035A	5035A	5035A	
Date Analyzed		12/24/2015	12/24/2015	12/24/2015	12/24/2015	12/24/2015	
Matrix		Soil	Soil	Soil	Soil	Soil	
Units		ug/Kg	ug/Kg	ug/Kg	ug/Kg	ug/Kg	
Dilution Factor		1	1	1	1	1	
Analytes	MDL	PQL	Results	Results	Results	Results	Results
1,2,3-Trichloropropane	5.0	10.0	ND	ND	ND	ND	ND
1,2,4-Trimethylbenzene	5.0	10.0	ND	ND	ND	ND	ND
1,3,5-Trimethylbenzene	5.0	10.0	ND	ND	ND	ND	ND
Vinyl Acetate	25	50	ND	ND	ND	ND	ND
Vinyl chloride (Chloroethene)	5.0	10.0	ND	ND	ND	ND	ND
o-Xylene	1.0	10.0	ND	ND	ND	ND	ND
m,p-Xylenes	1.0	20.0	ND	ND	ND	ND	ND
Our Lab I.D.		Method Blank	79442.12	79442.13	79442.15	79442.16	
Surrogates	%Rec.Limit	% Rec.	% Rec.	% Rec.	% Rec.	% Rec.	
Bromofluorobenzene	75-125	96.0	92.9	93.7	93.8	77.5	
Dibromofluoromethane	75-125	124	110	117	115	108	
Toluene-d8	75-125	114	110	109	111	110	



American Environmental Testing Laboratory Inc.

2834 & 2908 North Naomi Street Burbank, CA 91504 • DOHS NO: 1541, LACSD NO: 10181
 Tel: (888) 288-AETL • (818) 845-8200 • Fax: (818) 845-8840 • www.aetlab.com

ANALYTICAL RESULTS

Ordered By

Converse Consultants
 222 E. Huntington Drive
 Suite 211
 Monrovia, CA 91016-8006

Site

45100 60th Street West
 Lancaster, CA 93536

Telephone: (626)930-1200

Attn: Laura Tanaka

Page: 11

Project ID: 12-41-290-07

Project Name: Mira Loma Detention Center

AETL Job Number	Submitted	Client
79442	12/17/2015	CONVRS

Method: (8260B), Volatile Organic Compounds by GC/MS (SW846)

QC Batch No: 1224152A1

Our Lab I.D.			79442.18	79442.19	79442.21	79442.22	79442.24
Client Sample I.D.			SB6-2	SB6-4	SB7-2	SB7-4	SB8-2
Date Sampled			12/17/2015	12/17/2015	12/17/2015	12/17/2015	12/17/2015
Date Prepared			12/24/2015	12/24/2015	12/24/2015	12/24/2015	12/24/2015
Preparation Method			5035A	5035A	5035A	5035A	5035A
Date Analyzed			12/24/2015	12/24/2015	12/24/2015	12/24/2015	12/24/2015
Matrix			Soil	Soil	Soil	Soil	Soil
Units			ug/Kg	ug/Kg	ug/Kg	ug/Kg	ug/Kg
Dilution Factor			1	1	1	1	1
Analytes	MDL	PQL	Results	Results	Results	Results	Results
Acetone	25	50	ND	ND	ND	ND	ND
Benzene	1.0	10.0	ND	ND	ND	ND	ND
Bromobenzene (Phenyl bromide)	5.0	10.0	ND	ND	ND	ND	ND
Bromochloromethane	5.0	10.0	ND	ND	ND	ND	ND
Bromodichloromethane	5.0	10.0	ND	ND	ND	ND	ND
Bromoform (Tribromomethane)	25	50	ND	ND	ND	ND	ND
Bromomethane (Methyl bromide)	15	30	ND	ND	ND	ND	ND
2-Butanone (MEK)	25	50	ND	ND	ND	ND	ND
n-Butylbenzene	5.0	10.0	ND	ND	ND	ND	ND
sec-Butylbenzene	5.0	10.0	ND	ND	ND	ND	ND
tert-Butylbenzene	5.0	10.0	ND	ND	ND	ND	ND
Carbon Disulfide	25	50	ND	ND	ND	ND	ND
Carbon tetrachloride	5.0	10.0	ND	ND	ND	ND	ND
Chlorobenzene	5.0	10.0	ND	ND	ND	ND	ND
Chloroethane	15	30	ND	ND	ND	ND	ND
2-Chloroethyl vinyl ether	50	50	ND	ND	ND	ND	ND
Chloroform (Trichloromethane)	5.0	10.0	ND	ND	ND	ND	ND
Chloromethane (Methyl chloride)	15	30	ND	ND	ND	ND	ND
2-Chlorotoluene	5.0	10.0	ND	ND	ND	ND	ND
4-Chlorotoluene	5.0	10.0	ND	ND	ND	ND	ND
1,2-Dibromo-3-chloropropane (DBCP)	25	50	ND	ND	ND	ND	ND
Dibromochloromethane	5.0	10.0	ND	ND	ND	ND	ND
1,2-Dibromoethane (EDB)	5.0	10.0	ND	ND	ND	ND	ND
Dibromomethane	5.0	10.0	ND	ND	ND	ND	ND
1,2-Dichlorobenzene	5.0	10.0	ND	ND	ND	ND	ND
1,3-Dichlorobenzene	5.0	10.0	ND	ND	ND	ND	ND
1,4-Dichlorobenzene	5.0	10.0	ND	ND	ND	ND	ND



American Environmental Testing Laboratory Inc.

2834 & 2908 North Naomi Street Burbank, CA 91504 • DOHS NO: 1541, LACSD NO: 10181
 Tel: (888) 288-AETL • (818) 845-8200 • Fax: (818) 845-8840 • www.aetlab.com

ANALYTICAL RESULTS

Page: 12

Project ID: 12-41-290-07
 Project Name: Mira Loma Detention Center

AETL Job Number	Submitted	Client
79442	12/17/2015	CONVRS

Method: (8260B), Volatile Organic Compounds by GC/MS (SW846)

QC Batch No: 1224152A1

Our Lab I.D.			79442.18	79442.19	79442.21	79442.22	79442.24
Client Sample I.D.			SB6-2	SB6-4	SB7-2	SB7-4	SB8-2
Date Sampled			12/17/2015	12/17/2015	12/17/2015	12/17/2015	12/17/2015
Date Prepared			12/24/2015	12/24/2015	12/24/2015	12/24/2015	12/24/2015
Preparation Method			5035A	5035A	5035A	5035A	5035A
Date Analyzed			12/24/2015	12/24/2015	12/24/2015	12/24/2015	12/24/2015
Matrix			Soil	Soil	Soil	Soil	Soil
Units			ug/Kg	ug/Kg	ug/Kg	ug/Kg	ug/Kg
Dilution Factor			1	1	1	1	1
Analytes	MDL	PQL	Results	Results	Results	Results	Results
Dichlorodifluoromethane	15	30	ND	ND	ND	ND	ND
1,1-Dichloroethane	5.0	10.0	ND	ND	ND	ND	ND
1,2-Dichloroethane (EDC)	5.0	10.0	ND	ND	ND	ND	ND
1,1-Dichloroethene	5.0	10.0	ND	ND	ND	ND	ND
cis-1,2-Dichloroethene	5.0	10.0	ND	ND	ND	ND	ND
trans-1,2-Dichloroethene	5.0	10.0	ND	ND	ND	ND	ND
1,2-Dichloropropane	5.0	10.0	ND	ND	ND	ND	ND
1,3-Dichloropropane	5.0	10.0	ND	ND	ND	ND	ND
2,2-Dichloropropane	5.0	10.0	ND	ND	ND	ND	ND
1,1-Dichloropropene	5.0	10.0	ND	ND	ND	ND	ND
cis-1,3-Dichloropropene	5.0	10.0	ND	ND	ND	ND	ND
trans-1,3-Dichloropropene	5.0	10.0	ND	ND	ND	ND	ND
Ethylbenzene	1.0	10.0	ND	ND	ND	ND	ND
Hexachlorobutadiene	15	30	ND	ND	ND	ND	ND
2-Hexanone	25	50	ND	ND	ND	ND	ND
Iodomethane	5.0	10.0	ND	ND	ND	ND	ND
Isopropylbenzene	5.0	10.0	ND	ND	ND	ND	ND
p-Isopropyltoluene	5.0	10.0	ND	ND	ND	ND	ND
4-Methyl-2-pentanone (MIBK)	25	50	ND	ND	ND	ND	ND
Methyl-tert-butyl ether (MTBE)	2.0	10.0	ND	ND	ND	ND	ND
Methylene chloride (DCM)	25	50	ND	ND	ND	ND	ND
Naphthalene	5.0	10.0	ND	ND	ND	ND	ND
n-Propylbenzene	5.0	10.0	ND	ND	ND	ND	ND
Styrene	5.0	10.0	ND	ND	ND	ND	ND
1,1,1,2-Tetrachloroethane	5.0	10.0	ND	ND	ND	ND	ND
1,1,2,2-Tetrachloroethane	5.0	10.0	ND	ND	ND	ND	ND
Tetrachloroethene	2.0	10.0	ND	ND	ND	ND	ND
Toluene (Methyl benzene)	1.0	10.0	ND	ND	ND	ND	ND
1,2,3-Trichlorobenzene	5.0	10.0	ND	ND	ND	ND	ND
1,2,4-Trichlorobenzene	5.0	10.0	ND	ND	ND	ND	ND
1,1,1-Trichloroethane	5.0	10.0	ND	ND	ND	ND	ND
1,1,2-Trichloroethane	5.0	10.0	ND	ND	ND	ND	ND
Trichloroethene	1.5	10.0	ND	ND	ND	ND	ND
Trichlorofluoromethane	5.0	10.0	ND	ND	ND	ND	ND



American Environmental Testing Laboratory Inc.

2834 & 2908 North Naomi Street Burbank, CA 91504 • DOHS NO: 1541, LACSD NO: 10181
 Tel: (888) 288-AETL • (818) 845-8200 • Fax: (818) 845-8840 • www.aetlab.com

ANALYTICAL RESULTS

Page: 13

Project ID: 12-41-290-07
 Project Name: Mira Loma Detention Center

AETL Job Number	Submitted	Client
79442	12/17/2015	CONVRS

Method: (8260B), Volatile Organic Compounds by GC/MS (SW846)

QC Batch No: 1224152A1

Our Lab I.D.			79442.18	79442.19	79442.21	79442.22	79442.24
Client Sample I.D.			SB6-2	SB6-4	SB7-2	SB7-4	SB8-2
Date Sampled			12/17/2015	12/17/2015	12/17/2015	12/17/2015	12/17/2015
Date Prepared			12/24/2015	12/24/2015	12/24/2015	12/24/2015	12/24/2015
Preparation Method			5035A	5035A	5035A	5035A	5035A
Date Analyzed			12/24/2015	12/24/2015	12/24/2015	12/24/2015	12/24/2015
Matrix			Soil	Soil	Soil	Soil	Soil
Units			ug/Kg	ug/Kg	ug/Kg	ug/Kg	ug/Kg
Dilution Factor			1	1	1	1	1
Analytes	MDL	PQL	Results	Results	Results	Results	Results
1,2,3-Trichloropropane	5.0	10.0	ND	ND	ND	ND	ND
1,2,4-Trimethylbenzene	5.0	10.0	ND	ND	ND	ND	ND
1,3,5-Trimethylbenzene	5.0	10.0	ND	ND	ND	ND	ND
Vinyl Acetate	25	50	ND	ND	ND	ND	ND
Vinyl chloride (Chloroethene)	5.0	10.0	ND	ND	ND	ND	ND
o-Xylene	1.0	10.0	ND	ND	ND	ND	ND
m,p-Xylenes	1.0	20.0	ND	ND	ND	ND	ND
Our Lab I.D.			79442.18	79442.19	79442.21	79442.22	79442.24
Surrogates	%Rec.Limit		% Rec.				
Bromofluorobenzene	75-125		94.1	81.1	98.4	92.1	93.6
Dibromofluoromethane	75-125		120	116	117	119	122
Toluene-d8	75-125		109	111	111	112	113



American Environmental Testing Laboratory Inc.

2834 & 2908 North Naomi Street Burbank, CA 91504 • DOHS NO: 1541, LACSD NO: 10181
 Tel: (888) 288-AETL • (818) 845-8200 • Fax: (818) 845-8840 • www.aetlab.com

ANALYTICAL RESULTS

Ordered By

Converse Consultants
 222 E. Huntington Drive
 Suite 211
 Monrovia, CA 91016-8006

Site

45100 60th Street West
 Lancaster, CA 93536

Telephone: (626)930-1200

Attn: Laura Tanaka

Page: 14

Project ID: 12-41-290-07

Project Name: Mira Loma Detention Center

AETL Job Number	Submitted	Client
79442	12/17/2015	CONVRS

Method: (8260B), Volatile Organic Compounds by GC/MS (SW846)

QC Batch No: 1224152A1

Our Lab I.D.			79442.25			
Client Sample I.D.			SB8-4			
Date Sampled			12/17/2015			
Date Prepared			12/24/2015			
Preparation Method			5035A			
Date Analyzed			12/24/2015			
Matrix			Soil			
Units			ug/Kg			
Dilution Factor			1			
Analytes	MDL	PQL	Results			
Acetone	25	50	ND			
Benzene	1.0	10.0	ND			
Bromobenzene (Phenyl bromide)	5.0	10.0	ND			
Bromochloromethane	5.0	10.0	ND			
Bromodichloromethane	5.0	10.0	ND			
Bromoform (Tribromomethane)	25	50	ND			
Bromomethane (Methyl bromide)	15	30	ND			
2-Butanone (MEK)	25	50	ND			
n-Butylbenzene	5.0	10.0	ND			
sec-Butylbenzene	5.0	10.0	ND			
tert-Butylbenzene	5.0	10.0	ND			
Carbon Disulfide	25	50	ND			
Carbon tetrachloride	5.0	10.0	ND			
Chlorobenzene	5.0	10.0	ND			
Chloroethane	15	30	ND			
2-Chloroethyl vinyl ether	50	50	ND			
Chloroform (Trichloromethane)	5.0	10.0	ND			
Chloromethane (Methyl chloride)	15	30	ND			
2-Chlorotoluene	5.0	10.0	ND			
4-Chlorotoluene	5.0	10.0	ND			
1,2-Dibromo-3-chloropropane (DBCP)	25	50	ND			
Dibromochloromethane	5.0	10.0	ND			
1,2-Dibromoethane (EDB)	5.0	10.0	ND			
Dibromomethane	5.0	10.0	ND			
1,2-Dichlorobenzene	5.0	10.0	ND			
1,3-Dichlorobenzene	5.0	10.0	ND			
1,4-Dichlorobenzene	5.0	10.0	ND			



American Environmental Testing Laboratory Inc.

2834 & 2908 North Naomi Street Burbank, CA 91504 • DOHS NO: 1541, LACSD NO: 10181
 Tel: (888) 288-AETL • (818) 845-8200 • Fax: (818) 845-8840 • www.aetlab.com

ANALYTICAL RESULTS

Page: 15

Project ID: 12-41-290-07
 Project Name: Mira Loma Detention Center

AETL Job Number	Submitted	Client
79442	12/17/2015	CONVRS

Method: (8260B), Volatile Organic Compounds by GC/MS (SW846)

QC Batch No: 1224152A1

Our Lab I.D.		79442.25				
Client Sample I.D.		SB8-4				
Date Sampled		12/17/2015				
Date Prepared		12/24/2015				
Preparation Method		5035A				
Date Analyzed		12/24/2015				
Matrix		Soil				
Units		ug/Kg				
Dilution Factor		1				
Analytes	MDL	PQL	Results			
Dichlorodifluoromethane	15	30	ND			
1,1-Dichloroethane	5.0	10.0	ND			
1,2-Dichloroethane (EDC)	5.0	10.0	ND			
1,1-Dichloroethene	5.0	10.0	ND			
cis-1,2-Dichloroethene	5.0	10.0	ND			
trans-1,2-Dichloroethene	5.0	10.0	ND			
1,2-Dichloropropane	5.0	10.0	ND			
1,3-Dichloropropane	5.0	10.0	ND			
2,2-Dichloropropane	5.0	10.0	ND			
1,1-Dichloropropene	5.0	10.0	ND			
cis-1,3-Dichloropropene	5.0	10.0	ND			
trans-1,3-Dichloropropene	5.0	10.0	ND			
Ethylbenzene	1.0	10.0	ND			
Hexachlorobutadiene	15	30	ND			
2-Hexanone	25	50	ND			
Iodomethane	5.0	10.0	ND			
Isopropylbenzene	5.0	10.0	ND			
p-Isopropyltoluene	5.0	10.0	ND			
4-Methyl-2-pentanone (MIBK)	25	50	ND			
Methyl-tert-butyl ether (MTBE)	2.0	10.0	ND			
Methylene chloride (DCM)	25	50	ND			
Naphthalene	5.0	10.0	ND			
n-Propylbenzene	5.0	10.0	ND			
Styrene	5.0	10.0	ND			
1,1,1,2-Tetrachloroethane	5.0	10.0	ND			
1,1,2,2-Tetrachloroethane	5.0	10.0	ND			
Tetrachloroethene	2.0	10.0	ND			
Toluene (Methyl benzene)	1.0	10.0	ND			
1,2,3-Trichlorobenzene	5.0	10.0	ND			
1,2,4-Trichlorobenzene	5.0	10.0	ND			
1,1,1-Trichloroethane	5.0	10.0	ND			
1,1,2-Trichloroethane	5.0	10.0	ND			
Trichloroethene	1.5	10.0	ND			
Trichlorofluoromethane	5.0	10.0	ND			



American Environmental Testing Laboratory Inc.

2834 & 2908 North Naomi Street Burbank, CA 91504 • DOHS NO: 1541, LACSD NO: 10181
 Tel: (888) 288-AETL • (818) 845-8200 • Fax: (818) 845-8840 • www.aetlab.com

ANALYTICAL RESULTS

Page: 16

Project ID: 12-41-290-07
 Project Name: Mira Loma Detention Center

AETL Job Number	Submitted	Client
79442	12/17/2015	CONVRS

Method: (8260B), Volatile Organic Compounds by GC/MS (SW846)

QC Batch No: 1224152A1

Our Lab I.D.			79442.25				
Client Sample I.D.			SB8-4				
Date Sampled			12/17/2015				
Date Prepared			12/24/2015				
Preparation Method			5035A				
Date Analyzed			12/24/2015				
Matrix			Soil				
Units			ug/Kg				
Dilution Factor			1				
Analytes	MDL	PQL	Results				
1,2,3-Trichloropropane	5.0	10.0	ND				
1,2,4-Trimethylbenzene	5.0	10.0	ND				
1,3,5-Trimethylbenzene	5.0	10.0	ND				
Vinyl Acetate	25	50	ND				
Vinyl chloride (Chloroethene)	5.0	10.0	ND				
o-Xylene	1.0	10.0	ND				
m,p-Xylenes	1.0	20.0	ND				
Our Lab I.D.			79442.25				
Surrogates	%Rec.Limit		% Rec.				
Bromofluorobenzene	75-125		94.2				
Dibromofluoromethane	75-125		120				
Toluene-d8	75-125		112				



American Environmental Testing Laboratory Inc.

2834 & 2908 North Naomi Street Burbank, CA 91504 • DOHS NO: 1541, LACSD NO: 10181
 Tel: (888) 288-AETL • (818) 845-8200 • Fax: (818) 845-8840 • www.aetlab.com

ANALYTICAL RESULTS

Ordered By

Converse Consultants
 222 E. Huntington Drive
 Suite 211
 Monrovia, CA 91016-8006

Site

45100 60th Street West
 Lancaster, CA 93536

Telephone: (626)930-1200

Attn: Laura Tanaka

Page: 17

Project ID: 12-41-290-07

Project Name: Mira Loma Detention Center

AETL Job Number	Submitted	Client
79442	12/17/2015	CONVRS

Method: (M8015G), TPH as Gasoline and Light Hydrocarbons Using GC/FID

QC Batch No: 1222150B1

Our Lab I.D.			Method Blank	79442.01	79442.02	79442.03	79442.05
Client Sample I.D.				SB1-2	SB1-5	SB1-10	SB2-2
Date Sampled				12/17/2015	12/17/2015	12/17/2015	12/17/2015
Date Prepared			12/22/2015	12/22/2015	12/22/2015	12/22/2015	12/22/2015
Preparation Method			5030	5035A	5035A	5035A	5035A
Date Analyzed			12/22/2015	12/22/2015	12/22/2015	12/22/2015	12/22/2015
Matrix			Soil	Soil	Soil	Soil	Soil
Units			mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg
Dilution Factor			1	1	1	1	1
Analytes	MDL	PQL	Results	Results	Results	Results	Results
TPH as Gasoline and Light HC. (C4-C12)	0.100	1.000	ND	ND	ND	ND	ND
Our Lab I.D.			Method Blank	79442.01	79442.02	79442.03	79442.05
Surrogates	%Rec.Limit		% Rec.	% Rec.	% Rec.	% Rec.	% Rec.
Bromofluorobenzene	75-125		98.0	97.4	98.0	89.6	97.2



American Environmental Testing Laboratory Inc.

2834 & 2908 North Naomi Street Burbank, CA 91504 • DOHS NO: 1541, LACSD NO: 10181
 Tel: (888) 288-AETL • (818) 845-8200 • Fax: (818) 845-8840 • www.aetlab.com

ANALYTICAL RESULTS

Ordered By

Converse Consultants
 222 E. Huntington Drive
 Suite 211
 Monrovia, CA 91016-8006

Site

45100 60th Street West
 Lancaster, CA 93536

Telephone: (626)930-1200

Attn: Laura Tanaka

Page: 18

Project ID: 12-41-290-07

Project Name: Mira Loma Detention Center

AETL Job Number	Submitted	Client
79442	12/17/2015	CONVRS

Method: (M8015G), TPH as Gasoline and Light Hydrocarbons Using GC/FID

QC Batch No: 1222150B1

Our Lab I.D.			79442.06	79442.07	79442.09	79442.10	79442.12
Client Sample I.D.			SB2-5	SB2-10	SB3-2	SB3-4	SB4-2
Date Sampled			12/17/2015	12/17/2015	12/17/2015	12/17/2015	12/17/2015
Date Prepared			12/22/2015	12/22/2015	12/22/2015	12/22/2015	12/22/2015
Preparation Method			5035A	5035A	5035A	5035A	5035A
Date Analyzed			12/22/2015	12/22/2015	12/22/2015	12/22/2015	12/22/2015
Matrix			Soil	Soil	Soil	Soil	Soil
Units			mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg
Dilution Factor			1	1	1	1	1
Analytes	MDL	PQL	Results	Results	Results	Results	Results
TPH as Gasoline and Light HC. (C4-C12)	0.100	1.000	ND	ND	ND	ND	ND
Our Lab I.D.			79442.06	79442.07	79442.09	79442.10	79442.12
Surrogates	%Rec.Limit		% Rec.				
Bromofluorobenzene	75-125		94.2	88.8	88.0	91.6	90.0



American Environmental Testing Laboratory Inc.

2834 & 2908 North Naomi Street Burbank, CA 91504 • DOHS NO: 1541, LACSD NO: 10181
 Tel: (888) 288-AETL • (818) 845-8200 • Fax: (818) 845-8840 • www.aetlab.com

ANALYTICAL RESULTS

Ordered By

Converse Consultants
 222 E. Huntington Drive
 Suite 211
 Monrovia, CA 91016-8006

Site

45100 60th Street West
 Lancaster, CA 93536

Telephone: (626)930-1200

Attn: Laura Tanaka

Page: 19

Project ID: 12-41-290-07

Project Name: Mira Loma Detention Center

AETL Job Number	Submitted	Client
79442	12/17/2015	CONVRS

Method: (M8015G), TPH as Gasoline and Light Hydrocarbons Using GC/FID

QC Batch No: 122215NB1

Our Lab I.D.			Method Blank	79442.13	79442.15	79442.16	79442.18
Client Sample I.D.				SB4-4	SB5-2	SB5-4	SB6-2
Date Sampled				12/17/2015	12/17/2015	12/17/2015	12/17/2015
Date Prepared			12/22/2015	12/22/2015	12/22/2015	12/22/2015	12/22/2015
Preparation Method			5030	5035A	5035A	5035A	5035A
Date Analyzed			12/22/2015	12/22/2015	12/22/2015	12/23/2015	12/23/2015
Matrix			Soil	Soil	Soil	Soil	Soil
Units			mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg
Dilution Factor			1	1	1	1	1
Analytes	MDL	PQL	Results	Results	Results	Results	Results
TPH as Gasoline and Light HC. (C4-C12)	0.100	1.000	ND	ND	ND	ND	ND
Our Lab I.D.			Method Blank	79442.13	79442.15	79442.16	79442.18
Surrogates	%Rec.Limit		% Rec.	% Rec.	% Rec.	% Rec.	% Rec.
Bromofluorobenzene	75-125		80.2	85.8	86.0	86.2	87.0



American Environmental Testing Laboratory Inc.

2834 & 2908 North Naomi Street Burbank, CA 91504 • DOHS NO: 1541, LACSD NO: 10181
 Tel: (888) 288-AETL • (818) 845-8200 • Fax: (818) 845-8840 • www.aetlab.com

ANALYTICAL RESULTS

Ordered By

Converse Consultants
 222 E. Huntington Drive
 Suite 211
 Monrovia, CA 91016-8006

Site

45100 60th Street West
 Lancaster, CA 93536

Telephone: (626)930-1200

Attn: Laura Tanaka

Page: 20

Project ID: 12-41-290-07
 Project Name: Mira Loma Detention Center

AETL Job Number	Submitted	Client
79442	12/17/2015	CONVRS

Method: (M8015G), TPH as Gasoline and Light Hydrocarbons Using GC/FID

QC Batch No: 122215NB1

Our Lab I.D.			79442.19	79442.21	79442.22	79442.24	79442.25
Client Sample I.D.			SB6-4	SB7-2	SB7-4	SB8-2	SB8-4
Date Sampled			12/17/2015	12/17/2015	12/17/2015	12/17/2015	12/17/2015
Date Prepared			12/22/2015	12/22/2015	12/22/2015	12/22/2015	12/22/2015
Preparation Method			5035A	5035A	5035A	5035A	5035A
Date Analyzed			12/23/2015	12/23/2015	12/23/2015	12/23/2015	12/23/2015
Matrix			Soil	Soil	Soil	Soil	Soil
Units			mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg
Dilution Factor			1	1	1	1	1
Analytes	MDL	PQL	Results	Results	Results	Results	Results
TPH as Gasoline and Light HC. (C4-C12)	0.100	1.000	ND	ND	ND	ND	ND
Our Lab I.D.			79442.19	79442.21	79442.22	79442.24	79442.25
Surrogates	%Rec.Limit		% Rec.				
Bromofluorobenzene	75-125		87.8	82.6	86.0	80.6	86.0



American Environmental Testing Laboratory Inc.

2834 & 2908 North Naomi Street Burbank, CA 91504 • DOHS NO: 1541, LACSD NO: 10181
 Tel: (888) 288-AETL • (818) 845-8200 • Fax: (818) 845-8840 • www.aetlab.com

ANALYTICAL RESULTS

Ordered By

Converse Consultants
 222 E. Huntington Drive
 Suite 211
 Monrovia, CA 91016-8006

Site

45100 60th Street West
 Lancaster, CA 93536

Telephone: (626)930-1200

Attn: Laura Tanaka

Page: **21**

Project ID: 12-41-290-07

Project Name: Mira Loma Detention Center

AETL Job Number	Submitted	Client
79442	12/17/2015	CONVRS

Method: (M8015D), TPH as Diesel and Heavy Hydrocarbons Using GC/FID

QC Batch No: 121815DB2

Our Lab I.D.		Method Blank	79442.01	79442.02	79442.03	79442.05	
Client Sample I.D.			SB1-2	SB1-5	SB1-10	SB2-2	
Date Sampled			12/17/2015	12/17/2015	12/17/2015	12/17/2015	
Date Prepared		12/18/2015	12/18/2015	12/18/2015	12/18/2015	12/18/2015	
Preparation Method		3550B	3550B	3550B	3550B	3550B	
Date Analyzed		12/18/2015	12/18/2015	12/18/2015	12/19/2015	12/19/2015	
Matrix		Soil	Soil	Soil	Soil	Soil	
Units		mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	
Dilution Factor		1	1	1	1	1	
Analytes	MDL	PQL	Results	Results	Results	Results	Results
TPH as Diesel (C13-C22)	1.0	5.0	ND	ND	ND	ND	ND
TPH as Heavy Hydrocarbons (C23-C40)	1.0	5.0	ND	ND	ND	ND	ND
TPH Total as Diesel and Heavy HC.C13-C40	1.0	5.0	ND	ND	ND	ND	ND
Our Lab I.D.		Method Blank	79442.01	79442.02	79442.03	79442.05	
Surrogates	%Rec.Limit	% Rec.	% Rec.	% Rec.	% Rec.	% Rec.	
Chlorobenzene	75-125	116	100	99.8	101	102	



American Environmental Testing Laboratory Inc.

2834 & 2908 North Naomi Street Burbank, CA 91504 • DOHS NO: 1541, LACSD NO: 10181
 Tel: (888) 288-AETL • (818) 845-8200 • Fax: (818) 845-8840 • www.aetlab.com

ANALYTICAL RESULTS

Ordered By

Converse Consultants
 222 E. Huntington Drive
 Suite 211
 Monrovia, CA 91016-8006

Site

45100 60th Street West
 Lancaster, CA 93536

Telephone: (626)930-1200

Attn: Laura Tanaka

Page: 22

Project ID: 12-41-290-07
 Project Name: Mira Loma Detention Center

AETL Job Number	Submitted	Client
79442	12/17/2015	CONVRS

Method: (M8015D), TPH as Diesel and Heavy Hydrocarbons Using GC/FID

QC Batch No: 121815DB2

Our Lab I.D.			79442.06	79442.07	79442.09	79442.10	79442.12
Client Sample I.D.			SB2-5	SB2-10	SB3-2	SB3-4	SB4-2
Date Sampled			12/17/2015	12/17/2015	12/17/2015	12/17/2015	12/17/2015
Date Prepared			12/18/2015	12/18/2015	12/18/2015	12/18/2015	12/18/2015
Preparation Method			3550B	3550B	3550B	3550B	3550B
Date Analyzed			12/19/2015	12/19/2015	12/19/2015	12/19/2015	12/19/2015
Matrix			Soil	Soil	Soil	Soil	Soil
Units			mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg
Dilution Factor			1	1	1	1	1
Analytes	MDL	PQL	Results	Results	Results	Results	Results
TPH as Diesel (C13-C22)	1.0	5.0	ND	ND	ND	ND	ND
TPH as Heavy Hydrocarbons (C23-C40)	1.0	5.0	ND	ND	ND	ND	38.5
TPH Total as Diesel and Heavy HC.C13-C40	1.0	5.0	ND	ND	ND	ND	38.5
Our Lab I.D.			79442.06	79442.07	79442.09	79442.10	79442.12
Surrogates	%Rec.Limit		% Rec.				
Chlorobenzene	75-125		98.8	101	101	102	103



American Environmental Testing Laboratory Inc.

2834 & 2908 North Naomi Street Burbank, CA 91504 • DOHS NO: 1541, LACSD NO: 10181
 Tel: (888) 288-AETL • (818) 845-8200 • Fax: (818) 845-8840 • www.aetlab.com

ANALYTICAL RESULTS

Ordered By

Converse Consultants
 222 E. Huntington Drive
 Suite 211
 Monrovia, CA 91016-8006

Site

45100 60th Street West
 Lancaster, CA 93536

Telephone: (626)930-1200

Attn: Laura Tanaka

Page: 23

Project ID: 12-41-290-07

Project Name: Mira Loma Detention Center

AETL Job Number	Submitted	Client
79442	12/17/2015	CONVRS

Method: (M8015D), TPH as Diesel and Heavy Hydrocarbons Using GC/FID

QC Batch No: 121815DB2

Our Lab I.D.			79442.13	79442.15	79442.16	79442.18	79442.19
Client Sample I.D.			SB4-4	SB5-2	SB5-4	SB6-2	SB6-4
Date Sampled			12/17/2015	12/17/2015	12/17/2015	12/17/2015	12/17/2015
Date Prepared			12/18/2015	12/18/2015	12/18/2015	12/18/2015	12/18/2015
Preparation Method			3550B	3550B	3550B	3550B	3550B
Date Analyzed			12/19/2015	12/19/2015	12/19/2015	12/19/2015	12/19/2015
Matrix			Soil	Soil	Soil	Soil	Soil
Units			mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg
Dilution Factor			1	1	1	1	1
Analytes	MDL	PQL	Results	Results	Results	Results	Results
TPH as Diesel (C13-C22)	1.0	5.0	ND	ND	ND	ND	ND
TPH as Heavy Hydrocarbons (C23-C40)	1.0	5.0	ND	ND	ND	ND	8.85
TPH Total as Diesel and Heavy HC.C13-C40	1.0	5.0	ND	ND	ND	ND	8.85
Our Lab I.D.			79442.13	79442.15	79442.16	79442.18	79442.19
Surrogates	%Rec.Limit		% Rec.				
Chlorobenzene	75-125		101	102	101	101	100



American Environmental Testing Laboratory Inc.

2834 & 2908 North Naomi Street Burbank, CA 91504 • DOHS NO: 1541, LACSD NO: 10181
 Tel: (888) 288-AETL • (818) 845-8200 • Fax: (818) 845-8840 • www.aetlab.com

ANALYTICAL RESULTS

Ordered By

Converse Consultants
 222 E. Huntington Drive
 Suite 211
 Monrovia, CA 91016-8006

Site

45100 60th Street West
 Lancaster, CA 93536

Telephone: (626)930-1200

Attn: Laura Tanaka

Page: 24

Project ID: 12-41-290-07

Project Name: Mira Loma Detention Center

AETL Job Number	Submitted	Client
79442	12/17/2015	CONVRS

Method: (M8015D), TPH as Diesel and Heavy Hydrocarbons Using GC/FID

QC Batch No: 121815DB2

Our Lab I.D.			79442.21	79442.22	79442.24	79442.25	
Client Sample I.D.			SB7-2	SB7-4	SB8-2	SB8-4	
Date Sampled			12/17/2015	12/17/2015	12/17/2015	12/17/2015	
Date Prepared			12/18/2015	12/18/2015	12/18/2015	12/18/2015	
Preparation Method			3550B	3550B	3550B	3550B	
Date Analyzed			12/19/2015	12/19/2015	12/19/2015	12/19/2015	
Matrix			Soil	Soil	Soil	Soil	
Units			mg/Kg	mg/Kg	mg/Kg	mg/Kg	
Dilution Factor			1	1	1	1	
Analytes	MDL	PQL	Results	Results	Results	Results	
TPH as Diesel (C13-C22)	1.0	5.0	120	ND	ND	ND	
TPH as Heavy Hydrocarbons (C23-C40)	1.0	5.0	1,040	ND	6.13	ND	
TPH Total as Diesel and Heavy HC.C13-C40	1.0	5.0	1,160	ND	6.13	ND	
Our Lab I.D.			79442.21	79442.22	79442.24	79442.25	
Surrogates	%Rec.Limit		% Rec.	% Rec.	% Rec.	% Rec.	
Chlorobenzene	75-125		98.2	98.6	98.0	98.1	



American Environmental Testing Laboratory Inc.

2834 & 2908 North Naomi Street Burbank, CA 91504 • DOHS NO: 1541, LACSD NO: 10181
 Tel: (888) 288-AETL • (818) 845-8200 • Fax: (818) 845-8840 • www.aetlab.com

ANALYTICAL RESULTS

Ordered By

Converse Consultants
 222 E. Huntington Drive
 Suite 211
 Monrovia, CA 91016-8006

Site

45100 60th Street West
 Lancaster, CA 93536

Telephone: (626)930-1200

Attn: Laura Tanaka

Page: 25

Project ID: 12-41-290-07

Project Name: Mira Loma Detention Center

AETL Job Number	Submitted	Client
79442	12/17/2015	CONVRS

Method: (6010B/7000CAM), Title 22 Metals (SW-846)

QC Batch No: 1218152C12

Our Lab I.D.		Method Blank	79442.01	79442.02	79442.03	79442.05	
Client Sample I.D.			SB1-2	SB1-5	SB1-10	SB2-2	
Date Sampled			12/17/2015	12/17/2015	12/17/2015	12/17/2015	
Date Prepared		12/18/2015	12/18/2015	12/18/2015	12/18/2015	12/18/2015	
Preparation Method		3050B	3050B	3050B	3050B	3050B	
Date Analyzed		12/22/2015	12/22/2015	12/22/2015	12/22/2015	12/22/2015	
Matrix		Soil	Soil	Soil	Soil	Soil	
Units		mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	
Dilution Factor		1	1	1	1	1	
Analytes	MDL	PQL	Results	Results	Results	Results	Results
Antimony	1.0	5.0	ND	ND	ND	ND	ND
Arsenic	1.0	5.0	ND	ND	4.44J	ND	ND
Barium	2.5	5.0	ND	34.5	69.4	84.1	23.0
Beryllium	1.3	2.5	ND	ND	ND	ND	ND
Cadmium	1.3	2.5	ND	ND	ND	ND	ND
Chromium	2.5	5.0	ND	7.52	7.40	9.19	3.94J
Cobalt	2.5	5.0	ND	5.72	6.24	7.48	3.35J
Copper	2.5	5.0	ND	10.2	5.09	6.22	3.82J
Lead	2.5	5.0	ND	ND	ND	ND	ND
Mercury (By EPA 7471)	0.1	0.2	ND	ND	ND	ND	ND
Molybdenum	2.5	5.0	ND	ND	ND	ND	ND
Nickel	2.5	5.0	ND	5.53	5.05	5.70	3.04J
Selenium	1.0	5.0	ND	ND	ND	ND	ND
Silver	2.5	5.0	ND	ND	ND	ND	ND
Thallium	1.0	5.0	ND	ND	ND	ND	ND
Vanadium	2.5	5.0	ND	25.8	46.1	34.9	20.5
Zinc	2.5	5.0	ND	47.6	47.9	57.1	26.5



American Environmental Testing Laboratory Inc.

2834 & 2908 North Naomi Street Burbank, CA 91504 • DOHS NO: 1541, LACSD NO: 10181
 Tel: (888) 288-AETL • (818) 845-8200 • Fax: (818) 845-8840 • www.aetlab.com

ANALYTICAL RESULTS

Ordered By

Converse Consultants
 222 E. Huntington Drive
 Suite 211
 Monrovia, CA 91016-8006

Site

45100 60th Street West
 Lancaster, CA 93536

Telephone: (626)930-1200

Attn: Laura Tanaka

Page: 26

Project ID: 12-41-290-07

Project Name: Mira Loma Detention Center

AETL Job Number	Submitted	Client
79442	12/17/2015	CONVRS

Method: (6010B/7000CAM), Title 22 Metals (SW-846)

QC Batch No: 1218152C12

Our Lab I.D.			79442.06	79442.07	79442.09	79442.10	79442.12
Client Sample I.D.			SB2-5	SB2-10	SB3-2	SB3-4	SB4-2
Date Sampled			12/17/2015	12/17/2015	12/17/2015	12/17/2015	12/17/2015
Date Prepared			12/18/2015	12/18/2015	12/18/2015	12/18/2015	12/18/2015
Preparation Method			3050B	3050B	3050B	3050B	3050B
Date Analyzed			12/22/2015	12/22/2015	12/22/2015	12/22/2015	12/22/2015
Matrix			Soil	Soil	Soil	Soil	Soil
Units			mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg
Dilution Factor			1	1	1	1	1
Analytes	MDL	PQL	Results	Results	Results	Results	Results
Antimony	1.0	5.0	ND	ND	ND	ND	ND
Arsenic	1.0	5.0	ND	ND	ND	ND	ND
Barium	2.5	5.0	45.5	92.7	39.6	32.0	44.5
Beryllium	1.3	2.5	ND	ND	ND	ND	ND
Cadmium	1.3	2.5	ND	ND	ND	ND	ND
Chromium	2.5	5.0	4.30J	6.67	5.93	5.96	6.52
Cobalt	2.5	5.0	3.91J	5.34	4.76J	4.97J	3.69J
Copper	2.5	5.0	4.45J	5.48	7.69	5.22	8.59
Lead	2.5	5.0	ND	ND	ND	ND	6.55
Mercury (By EPA 7471)	0.1	0.2	ND	ND	ND	ND	ND
Molybdenum	2.5	5.0	ND	ND	ND	ND	ND
Nickel	2.5	5.0	2.92J	4.69J	3.68J	4.09J	4.54J
Selenium	1.0	5.0	ND	ND	ND	ND	ND
Silver	2.5	5.0	ND	ND	ND	ND	ND
Thallium	1.0	5.0	ND	ND	ND	ND	ND
Vanadium	2.5	5.0	25.2	28.1	19.4	29.4	19.3
Zinc	2.5	5.0	31.8	39.9	33.6	38.9	29.3



American Environmental Testing Laboratory Inc.

2834 & 2908 North Naomi Street Burbank, CA 91504 • DOHS NO: 1541, LACSD NO: 10181
 Tel: (888) 288-AETL • (818) 845-8200 • Fax: (818) 845-8840 • www.aetlab.com

ANALYTICAL RESULTS

Ordered By

Converse Consultants
 222 E. Huntington Drive
 Suite 211
 Monrovia, CA 91016-8006

Site

45100 60th Street West
 Lancaster, CA 93536

Telephone: (626)930-1200

Attn: Laura Tanaka

Page: 27

Project ID: 12-41-290-07

Project Name: Mira Loma Detention Center

AETL Job Number	Submitted	Client
79442	12/17/2015	CONVRS

Method: (6010B/7000CAM), Title 22 Metals (SW-846)

QC Batch No: 1218152C13

Our Lab I.D.			Method Blank	79442.13	79442.15	79442.16	79442.18
Client Sample I.D.				SB4-4	SB5-2	SB5-4	SB6-2
Date Sampled				12/17/2015	12/17/2015	12/17/2015	12/17/2015
Date Prepared			12/18/2015	12/18/2015	12/18/2015	12/18/2015	12/18/2015
Preparation Method			3050B	3050B	3050B	3050B	3050B
Date Analyzed			12/22/2015	12/22/2015	12/22/2015	12/22/2015	12/22/2015
Matrix			Soil	Soil	Soil	Soil	Soil
Units			mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg
Dilution Factor			1	1	1	1	1
Analytes	MDL	PQL	Results	Results	Results	Results	Results
Antimony	1.0	5.0	ND	ND	ND	ND	ND
Arsenic	1.0	5.0	ND	ND	ND	ND	ND
Barium	2.5	5.0	ND	20.2	30.1	28.3	42.7
Beryllium	1.3	2.5	ND	ND	ND	ND	ND
Cadmium	1.3	2.5	ND	ND	ND	ND	ND
Chromium	2.5	5.0	ND	3.88J	6.21	4.20J	11.4
Cobalt	2.5	5.0	ND	3.13J	3.64J	3.99J	8.36
Copper	2.5	5.0	ND	2.90J	4.60J	ND	9.46
Lead	2.5	5.0	ND	ND	ND	ND	ND
Mercury (By EPA 7471)	0.1	0.2	ND	ND	ND	ND	ND
Molybdenum	2.5	5.0	ND	ND	ND	ND	ND
Nickel	2.5	5.0	ND	2.53J	4.11J	ND	8.01
Selenium	1.0	5.0	ND	ND	ND	ND	ND
Silver	2.5	5.0	ND	ND	ND	ND	ND
Thallium	1.0	5.0	ND	ND	ND	ND	ND
Vanadium	2.5	5.0	ND	19.7	18.3	24.5	40.9
Zinc	2.5	5.0	ND	22.4	28.7	28.1	68.1



American Environmental Testing Laboratory Inc.

2834 & 2908 North Naomi Street Burbank, CA 91504 • DOHS NO: 1541, LACSD NO: 10181
 Tel: (888) 288-AETL • (818) 845-8200 • Fax: (818) 845-8840 • www.aetlab.com

ANALYTICAL RESULTS

Ordered By

Converse Consultants
 222 E. Huntington Drive
 Suite 211
 Monrovia, CA 91016-8006

Site

45100 60th Street West
 Lancaster, CA 93536

Telephone: (626)930-1200

Attn: Laura Tanaka

Page: 28

Project ID: 12-41-290-07
 Project Name: Mira Loma Detention Center

AETL Job Number	Submitted	Client
79442	12/17/2015	CONVRS

Method: (6010B/7000CAM), Title 22 Metals (SW-846)

QC Batch No: 1218152C13

Our Lab I.D.			79442.19	79442.21	79442.22	79442.24	79442.25
Client Sample I.D.			SB6-4	SB7-2	SB7-4	SB8-2	SB8-4
Date Sampled			12/17/2015	12/17/2015	12/17/2015	12/17/2015	12/17/2015
Date Prepared			12/18/2015	12/18/2015	12/18/2015	12/18/2015	12/18/2015
Preparation Method			3050B	3050B	3050B	3050B	3050B
Date Analyzed			12/22/2015	12/22/2015	12/22/2015	12/22/2015	12/22/2015
Matrix			Soil	Soil	Soil	Soil	Soil
Units			mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg
Dilution Factor			1	1	1	1	1
Analytes	MDL	PQL	Results	Results	Results	Results	Results
Antimony	1.0	5.0	ND	ND	ND	ND	ND
Arsenic	1.0	5.0	ND	ND	ND	ND	ND
Barium	2.5	5.0	40.9	37.2	30.1	64.9	29.1
Beryllium	1.3	2.5	ND	ND	ND	ND	ND
Cadmium	1.3	2.5	ND	ND	ND	ND	ND
Chromium	2.5	5.0	4.68J	7.19	2.74J	4.28J	3.55J
Cobalt	2.5	5.0	3.71J	3.82J	ND	4.45J	2.77J
Copper	2.5	5.0	3.59J	4.28J	ND	11.5	4.08J
Lead	2.5	5.0	ND	ND	ND	3.05J	ND
Mercury (By EPA 7471)	0.1	0.2	ND	ND	ND	ND	ND
Molybdenum	2.5	5.0	ND	ND	ND	ND	ND
Nickel	2.5	5.0	2.86J	4.77J	ND	3.97J	ND
Selenium	1.0	5.0	ND	ND	ND	ND	ND
Silver	2.5	5.0	ND	ND	ND	ND	ND
Thallium	1.0	5.0	ND	ND	ND	ND	ND
Vanadium	2.5	5.0	24.5	27.9	15.8	19.5	18.8
Zinc	2.5	5.0	30.1	29.2	19.0	36.8	24.7



American Environmental Testing Laboratory Inc.

2834 & 2908 North Naomi Street Burbank, CA 91504 • DOHS NO: 1541, LACSD NO: 10181
 Tel: (888) 288-AETL • (818) 845-8200 • Fax: (818) 845-8840 • www.aetlab.com

QUALITY CONTROL RESULTS

Ordered By

Converse Consultants
 222 E. Huntington Drive
 Suite 211
 Monrovia, CA 91016-8006

Site

45100 60th Street West
 Lancaster, CA 93536

Telephone: (626)930-1200

Attn: Laura Tanaka

Page: 29

Project ID: 12-41-290-07

Project Name: Mira Loma Detention Center

AETL Job Number	Submitted	Client
79442	12/17/2015	CONVRS

Method: (6010B/7000CAM), Title 22 Metals (SW-846)

QC Batch No: 1218152C12; Dup or Spiked Sample: 79442.01; LCS: Clean Sand; QC Prepared: 12/18/2015; QC Analyzed: 12/22/2015;
 Units: mg/Kg

Analytes	Sample Result	MS Concen	MS Recov	MS % REC	MS DUP Concen	MS DUP Recov	MS DUP % REC	RPD %	MS/MSD % Limit	MS RPD % Limit
Antimony	0.00	50.0	42.5	85.0	50.0	41.7	83.4	1.90	75-125	<15
Arsenic	0.00	50.0	42.0	84.0	50.0	41.4	82.8	1.44	75-125	<15
Barium	34.5	50.0	78.1	87.2	50.0	77.8	86.6	<1	75-125	<15
Beryllium	0.00	50.0	48.9	97.8	50.0	48.8	97.6	<1	75-125	<15
Cadmium	0.00	50.0	39.4	78.8	50.0	39.3	78.6	<1	75-125	<15
Chromium	7.52	50.0	50.1	85.2	50.0	49.6	84.2	1.18	75-125	<15
Cobalt	5.72	50.0	46.2	81.0	50.0	45.6	79.8	1.49	75-125	<15
Copper	10.2	50.0	57.0	93.6	50.0	56.8	93.2	<1	75-125	<15
Lead	0.00	50.0	36.3 M	72.6	50.0	35.6 M	71.2	1.95	75-125	<15
Mercury (By EPA 7471)	0.00	0.500	0.530	106	0.500	0.535	107	<1	75-125	<15
Molybdenum	0.00	50.0	39.8	79.6	50.0	39.1	78.2	1.77	75-125	<15
Nickel	5.53	50.0	44.9	78.7	50.0	44.3	77.5	1.54	75-125	<15
Selenium	0.00	50.0	43.3	86.6	50.0	42.2	84.4	2.57	75-125	<15
Silver	0.00	50.0	42.8	85.6	50.0	42.7	85.4	<1	75-125	<15
Thallium	0.00	50.0	29.5 M	59.0	50.0	28.9 M	57.8	2.05	75-125	<15
Vanadium	25.8	50.0	72.1	92.6	50.0	71.9	92.2	<1	75-125	<15
Zinc	47.6	50.0	92.9	90.6	50.0	92.7	90.2	<1	75-125	<15

QC Batch No: 1218152C12; Dup or Spiked Sample: 79442.01; LCS: Clean Sand; QC Prepared: 12/18/2015; QC Analyzed: 12/22/2015;
 Units: mg/Kg

Analytes	LCS Concen	LCS Recov	LCS % REC	LCS DUP Concen	LCS DUP Recov	LCS DUP % REC	LCS RPD % REC	LCS/LCSD % Limit	LCS RPD % Limit
Antimony	50.0	52.1	104	50.0	51.8	104	<1	75-125	<15
Arsenic	50.0	52.5	105	50.0	52.7	105	<1	75-125	<15
Barium	50.0	56.0	112	50.0	56.0	112	<1	75-125	<15
Beryllium	50.0	59.3	119	50.0	59.5	119	<1	75-125	<15
Cadmium	50.0	55.3	111	50.0	55.3	111	<1	75-125	<15
Chromium	50.0	52.6	105	50.0	52.6	105	<1	75-125	<15
Cobalt	50.0	55.5	111	50.0	55.5	111	<1	75-125	<15
Copper	50.0	54.2	108	50.0	54.2	108	<1	75-125	<15
Lead	50.0	53.0	106	50.0	52.7	105	<1	75-125	<15



American Environmental Testing Laboratory Inc.

2834 & 2908 North Naomi Street Burbank, CA 91504 • DOHS NO: 1541, LACSD NO: 10181
Tel: (888) 288-AETL • (818) 845-8200 • Fax: (818) 845-8840 • www.aetlab.com

QUALITY CONTROL RESULTS

Page: 30

Project ID: 12-41-290-07
Project Name: Mira Loma Detention Center

AETL Job Number	Submitted	Client
79442	12/17/2015	CONVRS

Method: (6010B/7000CAM), Title 22 Metals (SW-846)

QC Batch No: 1218152C12; Dup or Spiked Sample: 79442.01; LCS: Clean Sand; QC Prepared: 12/18/2015; QC Analyzed: 12/22/2015;
Units: mg/Kg

Analytes	LCS Concen	LCS Recov	LCS % REC	LCS DUP Concen	LCS DUP Recov	LCS DUP % REC	LCS RPD % REC	LCS/LCSD % Limit	LCS RPD % Limit	
Mercury (By EPA 7471)	0.500	0.515	103	0.500	0.510	102	<1	75-125	<15	
Molybdenum	50.0	51.7	103	50.0	51.5	103	<1	75-125	<15	
Nickel	50.0	54.9	110	50.0	54.9	110	<1	75-125	<15	
Selenium	50.0	51.6	103	50.0	51.7	103	<1	75-125	<15	
Silver	50.0	54.7	109	50.0	54.7	109	<1	75-125	<15	
Thallium	50.0	54.4	109	50.0	53.9	108	<1	75-125	<15	
Vanadium	50.0	55.7	111	50.0	55.6	111	<1	75-125	<15	
Zinc	50.0	53.7	107	50.0	53.6	107	<1	75-125	<15	



American Environmental Testing Laboratory Inc.

2834 & 2908 North Naomi Street Burbank, CA 91504 • DOHS NO: 1541, LACSD NO: 10181
 Tel: (888) 288-AETL • (818) 845-8200 • Fax: (818) 845-8840 • www.aetlab.com

QUALITY CONTROL RESULTS

Ordered By

Converse Consultants
 222 E. Huntington Drive
 Suite 211
 Monrovia, CA 91016-8006

Site

45100 60th Street West
 Lancaster, CA 93536

Telephone: (626)930-1200

Attn: Laura Tanaka

Page: 31

Project ID: 12-41-290-07

Project Name: Mira Loma Detention Center

AETL Job Number	Submitted	Client
79442	12/17/2015	CONVRS

Method: (6010B/7000CAM), Title 22 Metals (SW-846)

QC Batch No: 1218152C13; Dup or Spiked Sample: 79442.13; LCS: Clean Sand; QC Prepared: 12/18/2015; QC Analyzed: 12/22/2015;
 Units: mg/Kg

Analytes	Sample Result	MS Concen	MS Recov	MS % REC	MS DUP Concen	MS DUP Recov	MS DUP % REC	RPD %	MS/MSD % Limit	MS RPD % Limit
Antimony	0.00	50.0	44.0	88.0	50.0	44.7	89.4	1.58	75-125	<15
Arsenic	0.00	50.0	43.6	87.2	50.0	45.6	91.2	4.48	75-125	<15
Barium	20.2	50.0	68.3	96.2	50.0	68.6	96.8	<1	75-125	<15
Beryllium	0.00	50.0	55.2	110	50.0	55.4	111	<1	75-125	<15
Cadmium	0.00	50.0	45.5	91.0	50.0	45.7	91.4	<1	75-125	<15
Chromium	3.88	50.0	51.1	94.4	50.0	51.8	95.8	1.47	75-125	<15
Cobalt	3.13	50.0	50.8	95.3	50.0	51.4	96.5	1.25	75-125	<15
Copper	2.90	50.0	51.5	97.2	50.0	52.0	98.2	1.02	75-125	<15
Lead	0.00	50.0	42.3	84.6	50.0	42.9	85.8	1.41	75-125	<15
Mercury (By EPA 7471)	0.00	0.500	0.447	89.4	0.500	0.455	91.0	1.8	75-125	<15
Molybdenum	0.00	50.0	44.8	89.6	50.0	45.6	91.2	1.77	75-125	<15
Nickel	2.53	50.0	46.6	88.1	50.0	46.8	88.5	<1	75-125	<15
Selenium	0.00	50.0	44.3	88.6	50.0	45.5	91.0	2.67	75-125	<15
Silver	0.00	50.0	44.7	89.4	50.0	44.9	89.8	<1	75-125	<15
Thallium	0.00	50.0	37.6	75.2	50.0	38.1	76.2	1.32	75-125	<15
Vanadium	19.7	50.0	67.6	95.8	50.0	68.0	96.6	<1	75-125	<15
Zinc	22.4	50.0	65.7	86.6	50.0	65.9	87.0	<1	75-125	<15

QC Batch No: 1218152C13; Dup or Spiked Sample: 79442.13; LCS: Clean Sand; QC Prepared: 12/18/2015; QC Analyzed: 12/22/2015;
 Units: mg/Kg

Analytes	LCS Concen	LCS Recov	LCS % REC	LCS DUP Concen	LCS DUP Recov	LCS DUP % REC	LCS RPD % REC	LCS/LCSD % Limit	LCS RPD % Limit
Antimony	50.0	51.8	104	50.0	51.6	103	<1	75-125	<15
Arsenic	50.0	52.2	104	50.0	52.1	104	<1	75-125	<15
Barium	50.0	57.0	114	50.0	56.5	113	<1	75-125	<15
Beryllium	50.0	60.8	122	50.0	60.6	121	<1	75-125	<15
Cadmium	50.0	55.7	111	50.0	55.2	110	<1	75-125	<15
Chromium	50.0	52.6	105	50.0	52.1	104	<1	75-125	<15
Cobalt	50.0	55.9	112	50.0	55.4	111	<1	75-125	<15
Copper	50.0	55.4	111	50.0	54.8	110	<1	75-125	<15
Lead	50.0	52.9	106	50.0	52.6	105	<1	75-125	<15



American Environmental Testing Laboratory Inc.

2834 & 2908 North Naomi Street Burbank, CA 91504 • DOHS NO: 1541, LACSD NO: 10181
 Tel: (888) 288-AETL • (818) 845-8200 • Fax: (818) 845-8840 • www.aetlab.com

QUALITY CONTROL RESULTS

Page: 32

Project ID: 12-41-290-07
 Project Name: Mira Loma Detention Center

AETL Job Number	Submitted	Client
79442	12/17/2015	CONVRS

Method: (6010B/7000CAM), Title 22 Metals (SW-846)

QC Batch No: 1218152C13; Dup or Spiked Sample: 79442.13; LCS: Clean Sand; QC Prepared: 12/18/2015; QC Analyzed: 12/22/2015;
 Units: mg/Kg

Analytes	LCS Concen	LCS Recov	LCS % REC	LCS DUP Concen	LCS DUP Recov	LCS DUP % REC	LCS RPD % REC	LCS/LCSD % Limit	LCS RPD % Limit	
Mercury (By EPA 7471)	0.500	0.530	106	0.500	0.525	105	<1	75-125	<15	
Molybdenum	50.0	51.4	103	50.0	51.1	102	<1	75-125	<15	
Nickel	50.0	55.3	111	50.0	54.9	110	<1	75-125	<15	
Selenium	50.0	51.4	103	50.0	51.2	102	<1	75-125	<15	
Silver	50.0	55.8	112	50.0	55.2	110	1.80	75-125	<15	
Thallium	50.0	54.2	108	50.0	53.9	108	<1	75-125	<15	
Vanadium	50.0	56.4	113	50.0	56.0	112	<1	75-125	<15	
Zinc	50.0	53.8	108	50.0	53.3	107	<1	75-125	<15	



American Environmental Testing Laboratory Inc.

2834 & 2908 North Naomi Street Burbank, CA 91504 • DOHS NO: 1541, LACSD NO: 10181
 Tel: (888) 288-AETL • (818) 845-8200 • Fax: (818) 845-8840 • www.aetlab.com

QUALITY CONTROL RESULTS

Ordered By

Converse Consultants
 222 E. Huntington Drive
 Suite 211
 Monrovia, CA 91016-8006

Site

45100 60th Street West
 Lancaster, CA 93536

Telephone: (626)930-1200

Attn: Laura Tanaka

Page: 33

Project ID: 12-41-290-07

Project Name: Mira Loma Detention Center

AETL Job Number	Submitted	Client
79442	12/17/2015	CONVRS

Method: (8260B), Volatile Organic Compounds by GC/MS (SW846)

QC Batch No: 1223152A1; Dup or Spiked Sample: 79442.01; LCS: Clean Sand; QC Prepared: 12/23/2015; QC Analyzed: 12/23/2015;
 Units: ug/Kg

Analytes	Sample Result	MS Concen	MS Recov	MS % REC	MS DUP Concen	MS DUP Recov	MS DUP % REC	RPD %	MS/MSD % Limit	MS RPD % Limit
Benzene	0.00	50.0	33.3 M	66.6	50.0	34.5 M	69.0	3.54	75-125	<20
Chlorobenzene	0.00	50.0	43.9	87.8	50.0	46.7	93.4	6.18	75-125	<20
1,1-Dichloroethene	0.00	50.0	37.7	75.4	50.0	37.8	75.6	<1	75-125	<20
Methyl-tert-butyl ether (MTBE)	0.00	50.0	32.7 M	65.4	50.0	34.4 M	68.8	5.07	75-125	<20
Toluene (Methyl benzene)	0.00	50.0	41.9	83.8	50.0	42.9	85.8	2.36	75-125	<20
Trichloroethene	0.00	50.0	53.5	107	50.0	55.5	111	3.67	75-125	<20
Surrogates										
Bromofluorobenzene	0.00	50.0	45.1	90.1	50.0	45.5	91.0	<1	75-125	<20
Dibromofluoromethane	0.00	50.0	52.0	104	50.0	52.0	104	<1	75-125	<20
Toluene-d8	0.00	50.0	54.0	108	50.0	54.0	108	<1	75-125	<20

QC Batch No: 1223152A1; Dup or Spiked Sample: 79442.01; LCS: Clean Sand; QC Prepared: 12/23/2015; QC Analyzed: 12/23/2015;
 Units: ug/Kg

Analytes	LCS Concen	LCS Recov	LCS % REC	LCS DUP Concen	LCS DUP Recov	LCS DUP % REC	LCS RPD % REC	LCS/LCSD % Limit	LCS RPD % Limit
Benzene	50.0	41.2	82.4	50.0	43.0	86.0	4.28	75-125	<20
Chlorobenzene	50.0	57.2	114	50.0	60.0	120	5.13	75-125	<20
1,1-Dichloroethene	50.0	46.9	93.8	50.0	47.7	95.0	1.27	75-125	<20
Methyl-tert-butyl ether (MTBE)	50.0	41.0	82.0	50.0	42.7	85.0	3.59	75-125	<20
Toluene (Methyl benzene)	50.0	52.2	104	50.0	54.6	109	4.69	75-125	<20
Trichloroethene	50.0	52.8	106	50.0	56.5	113	6.39	75-125	<20
LCS									
Chloroform (Trichloromethane)	50.0	42.0	84.0	50.0	44.1	88.0	4.65	75-125	<20
Ethylbenzene	50.0	49.3	98.6	50.0	51.7	103	4.37	75-125	<20
1,1,1-Trichloroethane	50.0	49.6	99.2	50.0	51.8	104	4.72	75-125	<20
o-Xylene	50.0	51.6	103	50.0	53.4	107	3.81	75-125	<20
m,p-Xylenes	100	103	103	100	106	106	2.87	75-125	<20
Surrogates									
Bromofluorobenzene	50.0	47.3	94.6	50.0	46.0	92.0	2.75	75-125	<20
Dibromofluoromethane	50.0	50.5	101	50.0	50.4	101	<1	75-125	<20
Toluene-d8	50.0	53.2	106	50.0	52.9	106	<1	75-125	<20



American Environmental Testing Laboratory Inc.

2834 & 2908 North Naomi Street Burbank, CA 91504 • DOHS NO: 1541, LACSD NO: 10181
 Tel: (888) 288-AETL • (818) 845-8200 • Fax: (818) 845-8840 • www.aetlab.com

QUALITY CONTROL RESULTS

Ordered By

Converse Consultants
 222 E. Huntington Drive
 Suite 211
 Monrovia, CA 91016-8006

Site

45100 60th Street West
 Lancaster, CA 93536

Telephone: (626)930-1200

Attn: Laura Tanaka

Page: 34

Project ID: 12-41-290-07

Project Name: Mira Loma Detention Center

AETL Job Number	Submitted	Client
79442	12/17/2015	CONVRS

Method: (8260B), Volatile Organic Compounds by GC/MS (SW846)

QC Batch No: 1224152A1; Dup or Spiked Sample: 79442.16; LCS: Clean Sand; LCS Prepared: 12/24/2015; LCS Analyzed: 12/24/2015;
 Units: ug/Kg

Analytes	LCS Concen	LCS Recov	LCS % REC	LCS DUP Concen	LCS DUP Recov	LCS DUP % REC	LCS RPD % REC	LCS/LCSD % Limit	LCS RPD % Limit
Benzene	50.0	43.2	86.4	50.0	43.1	86.0	<1	75-125	<20
Chlorobenzene	50.0	61.2	122	50.0	60.9	122	<1	75-125	<20
1,1-Dichloroethene	50.0	48.4	96.8	50.0	47.2	94.0	2.94	75-125	<20
Methyl-tert-butyl ether (MTBE)	50.0	45.1	90.2	50.0	45.1	90.0	<1	75-125	<20
Toluene (Methyl benzene)	50.0	53.7	107	50.0	53.9	108	<1	75-125	<20
Trichloroethene	50.0	53.9	108	50.0	54.0	108	<1	75-125	<20
LCS									
Chloroform (Trichloromethane)	50.0	44.3	88.6	50.0	44.8	90.0	1.57	75-125	<20
Ethylbenzene	50.0	51.9	104	50.0	52.5	105	<1	75-125	<20
1,1,1-Trichloroethane	50.0	51.7	103	50.0	50.8	102	<1	75-125	<20
o-Xylene	50.0	54.9	110	50.0	55.0	110	<1	75-125	<20
m,p-Xylenes	100	110	110	100	110	110	<1	75-125	<20
Surrogates									
Bromofluorobenzene	50.0	45.2	90.4	50.0	45.5	91.0	<1	75-125	<20
Dibromofluoromethane	50.0	52.5	105	50.0	51.6	103	1.90	75-125	<20
Toluene-d8	50.0	52.2	104	50.0	52.7	105	<1	75-125	<20



American Environmental Testing Laboratory Inc.

2834 & 2908 North Naomi Street Burbank, CA 91504 • DOHS NO: 1541, LACSD NO: 10181
 Tel: (888) 288-AETL • (818) 845-8200 • Fax: (818) 845-8840 • www.aetlab.com

QUALITY CONTROL RESULTS

Ordered By

Converse Consultants
 222 E. Huntington Drive
 Suite 211
 Monrovia, CA 91016-8006

Site

45100 60th Street West
 Lancaster, CA 93536

Telephone: (626)930-1200

Attn: Laura Tanaka

Page: 35

Project ID: 12-41-290-07

Project Name: Mira Loma Detention Center

AETL Job Number	Submitted	Client
79442	12/17/2015	CONVRS

Method: (M8015D), TPH as Diesel and Heavy Hydrocarbons Using GC/FID

QC Batch No: 121815DB2; Dup or Spiked Sample: 79442.02; LCS: Clean Sand; QC Prepared: 12/18/2015; MS Analyzed: 12/19/2015;
 LCS Analyzed: 12/18/2015; Units: mg/Kg

Analytes	Sample Result	MS Concen	MS Recov	MS % REC	MS DUP Concen	MS DUP Recov	MS DUP % REC	RPD %	MS/MSD % Limit	MS RPD % Limit
TPH as Diesel (C13-C22)	0.00	500	533	107	500	526	105	1.89	75-125	<20
Surrogates										
Chlorobenzene	0.00	100	96.7	96.7	100	96.6	96.6	<1	75-125	<20

QC Batch No: 121815DB2; Dup or Spiked Sample: 79442.02; LCS: Clean Sand; QC Prepared: 12/18/2015; MS Analyzed: 12/19/2015;
 LCS Analyzed: 12/18/2015; Units: mg/Kg

Analytes	LCS Concen	LCS Recov	LCS % REC	LCS DUP Concen	LCS DUP Recov	LCS DUP % REC	LCS RPD % REC	LCS/LCSD % Limit	LCS RPD % Limit
TPH as Diesel (C13-C22)	500	511	102	500	540	108	5.71	75-125	<20
Surrogates									
Chlorobenzene	100	97.9	97.9	100	98.3	98.3	<1	75-125	<20



American Environmental Testing Laboratory Inc.

2834 & 2908 North Naomi Street Burbank, CA 91504 • DOHS NO: 1541, LACSD NO: 10181
 Tel: (888) 288-AETL • (818) 845-8200 • Fax: (818) 845-8840 • www.aetlab.com

QUALITY CONTROL RESULTS

Ordered By

Converse Consultants
 222 E. Huntington Drive
 Suite 211
 Monrovia, CA 91016-8006

Site

45100 60th Street West
 Lancaster, CA 93536

Telephone: (626)930-1200

Attn: Laura Tanaka

Page: 36

Project ID: 12-41-290-07

Project Name: Mira Loma Detention Center

AETL Job Number	Submitted	Client
79442	12/17/2015	CONVRS

Method: (M8015G), TPH as Gasoline and Light Hydrocarbons Using GC/FID

QC Batch No: 122215NB1; Dup or Spiked Sample: 79442.16AGA; LCS: Clean Sand; QC Prepared: 12/22/2015; MS Analyzed: 12/23/2015;
 LCS Analyzed: 12/22/2015; Units: mg/Kg

Analytes	Sample Result	MS Concen	MS Recov	MS % REC	MS DUP Concen	MS DUP Recov	MS DUP % REC	RPD %	MS/MSD % Limit	MS RPD % Limit
TPH as Gasoline and Light HC. (C4-C12)	0.00	1.00	0.720M	71.6	1.00	0.700M	69.7	2.69	75-125	<20
Surrogates										
Bromofluorobenzene	0.00	0.0500	0.0452	90.4	0.0500	0.0463	92.6	2.43	75-125	<20

QC Batch No: 122215NB1; Dup or Spiked Sample: 79442.16AGA; LCS: Clean Sand; QC Prepared: 12/22/2015; MS Analyzed: 12/23/2015;
 LCS Analyzed: 12/22/2015; Units: mg/Kg

Analytes	LCS Concen	LCS Recov	LCS % REC	LCS DUP Concen	LCS DUP Recov	LCS DUP % REC	LCS RPD % REC	LCS/LCSD % Limit	LCS RPD % Limit
TPH as Gasoline and Light HC. (C4-C12)	1.00	0.790	78.8	1.00	0.760	76.4	3.09	75-125	<20
Surrogates									
Bromofluorobenzene	0.0500	0.0465	93.0	0.0500	0.0453	90.6	2.58	75-125	<20



American Environmental Testing Laboratory Inc.

2834 & 2908 North Naomi Street Burbank, CA 91504 • DOHS NO: 1541, LACSD NO: 10181
 Tel: (888) 288-AETL • (818) 845-8200 • Fax: (818) 845-8840 • www.aetlab.com

QUALITY CONTROL RESULTS

Ordered By

Converse Consultants
 222 E. Huntington Drive
 Suite 211
 Monrovia, CA 91016-8006

Site

45100 60th Street West
 Lancaster, CA 93536

Telephone: (626)930-1200

Attn: Laura Tanaka

Page: 37

Project ID: 12-41-290-07

Project Name: Mira Loma Detention Center

AETL Job Number	Submitted	Client
79442	12/17/2015	CONVRS

Method: (M8015G), TPH as Gasoline and Light Hydrocarbons Using GC/FID

QC Batch No: 122215OB1; Dup or Spiked Sample: 79442.01AGA; LCS: Clean Sand; QC Prepared: 12/22/2015; QC Analyzed: 12/22/2015;
 Units: mg/Kg

Analytes	Sample Result	MS Concen	MS Recov	MS % REC	MS DUP Concen	MS DUP Recov	MS DUP % REC	RPD %	MS/MSD % Limit	MS RPD % Limit
TPH as Gasoline and Light HC. (C4-C12)	0.00	1.00	0.800	79.5	1.00	0.760	75.8	4.76	75-125	<20
Surrogates										
Bromofluorobenzene	0.00	0.0500	0.0535	107	0.0500	0.0527	105	1.87	75-125	<20

QC Batch No: 122215OB1; Dup or Spiked Sample: 79442.01AGA; LCS: Clean Sand; QC Prepared: 12/22/2015; QC Analyzed: 12/22/2015;
 Units: mg/Kg

Analytes	LCS Concen	LCS Recov	LCS % REC	LCS DUP Concen	LCS DUP Recov	LCS DUP % REC	LCS RPD % REC	LCS/LCSD % Limit	LCS RPD % Limit
TPH as Gasoline and Light HC. (C4-C12)	1.00	0.930	92.6	1.00	0.900	89.9	2.96	75-125	<20
Surrogates									
Bromofluorobenzene	0.0500	0.0514	103	0.0500	0.0529	106	2.91	75-125	<20



American Environmental Testing Laboratory Inc.

2834 & 2908 North Naomi Street, Burbank, CA 91504 • DOHS NO: 1541, LACSD NO: 10181
Tel: (888) 288-AETL • (818) 845-8200 • Fax: (818) 845-8840 • www.aetlab.com

Data Qualifiers and Descriptors

Data Qualifier:

- #: Recovery is not within acceptable control limits.
- *: In the QC section, sample results have been taken directly from the ICP reading. No preparation factor has been applied.
- B: Analyte was present in the Method Blank.
- D: Result is from a diluted analysis.
- E: Result is beyond calibration limits and is estimated.
- H: Analysis was performed over the allowed holding time due to circumstances which were beyond laboratory control.
- J: Analyte was detected. However, the analyte concentration is an estimated value, which is between the Method Detection Limit (MDL) and the Practical Quantitation Limit (PQL).
- M: Matrix spike recovery is outside control limits due to matrix interference. Laboratory Control Sample recovery was acceptable.
- MCL: Maximum Contaminant Level
- NS: No Standard Available
- S6: Surrogate recovery is outside control limits due to matrix interference.
- S8: The analysis of the sample required a dilution such that the surrogate concentration was diluted below the method acceptance criteria.
- X: Results represent LCS and LCSD data.

Definition:

- %Limi: Percent acceptable limits.
- %REC: Percent recovery.
- Con.L: Acceptable Control Limits
- Conce: Added concentration to the sample.
- LCS: Laboratory Control Sample
- MDL: Method Detection Limit is a statistically derived number which is specific for each instrument, each method, and each compound. It indicates a distinctively detectable quantity with 99% probability.



American Environmental Testing Laboratory Inc.

2834 & 2908 North Naomi Street, Burbank, CA 91504 • DOHS NO: 1541, LACSD NO: 10181
Tel: (888) 288-AETL • (818) 845-8200 • Fax: (818) 845-8840 • www.aetlab.com

Data Qualifiers and Descriptors

MS:	Matrix Spike
MS DU:	Matrix Spike Duplicate
ND:	Analyte was not detected in the sample at or above MDL.
PQL:	Practical Quantitation Limit or ML (Minimum Level as per RWQCB) is the minimum concentration that can be quantified with more than 99% confidence. Taking into account all aspects of the entire analytical instrumentation and practice.
Recov:	Recovered concentration in the sample.
RPD:	Relative Percent Difference



Draft Environmental Impact Report

County of Los Angeles Mira Loma Women's Detention Center Project

City of Lancaster, California
SCH No. 2014091012

Prepared for | County of Los Angeles
Chief Executive Office
754 Kenneth Hahn Hall of Administration
500 West Temple Street
Los Angeles, California 90012

Prepared by | BonTerra Psomas
225 South Lake Avenue, Suite 1000
Pasadena, California 91101
T: (626) 351-2000 F: (626)351-2030

November 2015



TABLE OF CONTENTS

<u>Section</u>	<u>Page</u>
Executive Summary	1
Introduction.....	1
Project Summary.....	1
<i>Project Location and Setting</i>	1
<i>Project Description</i>	2
Project Alternatives	3
Issues to be Resolved	5
Areas of Known Controversy.....	6
Summary of Environmental Impacts.....	6
Section 1.0 Introduction	1-1
1.1 Purpose of the Environmental Impact Report.....	1-1
1.1.1 <i>California Environmental Quality Act Compliance</i>	1-1
1.1.2 <i>Lead Agency</i>	1-1
1.1.3 <i>Intended Uses of the EIR</i>	1-1
1.1.4 <i>Incorporation by Reference</i>	1-2
1.2 Organization of the EIR	1-3
1.3 EIR Focus.....	1-4
1.3.1 <i>Issues Addressed in this EIR</i>	1-4
1.3.2 <i>Scoping Process</i>	1-5
1.3.3 <i>Environmental Analysis</i>	1-8
1.4 Public Review of the Draft EIR	1-10
1.5 Project Sponsor and Contact Person	1-11
Section 2.0 Environmental Setting	2-1
2.1 Project Location and Setting.....	2-1
2.2 Historical Context.....	2-2
2.2.1 <i>Overview of Former Operations</i>	2-2
2.2.2 <i>Female County Inmates</i>	2-2
2.3 Project Site Characteristics.....	2-3
2.3.1 <i>Current Operations and Staffing</i>	2-3
2.3.2 <i>Biological Resources</i>	2-3
2.3.3 <i>On-Site Structures</i>	2-3
2.4 Surrounding Land Uses	2-5
2.4.1 <i>Land Uses to the North</i>	2-5
2.4.2 <i>Land Uses to the East</i>	2-6
2.4.3 <i>Land Uses to the South</i>	2-6
2.4.4 <i>Land Uses to the West</i>	2-7
2.5 Cumulative Projects.....	2-7

2.6	References	2-13
Section 3.0	Project Description	3-1
3.1	Project Background	3-1
	3.1.1 Jail Plan Report and Assembly Bill 900	3-3
	3.1.2 Female Inmate Housing Need	3-4
3.2	Project Goal and Objectives	3-4
	3.2.1 Project Goal	3-4
	3.2.2 Project Objectives	3-5
3.3	Project Description.....	3-6
	3.3.1 Transfer of Inmates.....	3-6
	3.3.2 Project Facilities and Functions	3-6
	3.3.3 Project Design Features	3-11
	3.3.4 Reduced Recidivism	3-17
	3.3.5 Project Construction.....	3-20
	3.3.6 Project Operations	3-23
3.4	Design-Build Process	3-26
3.5	Discretionary Actions	3-27
	3.5.1 Lead Agency	3-27
	3.5.2 Responsible and Trustee Agencies	3-27
3.6	References	3-28
Section 4.0	Environmental Analysis.....	4-1
4.1	Aesthetics	4.1-1
	4.1.1 Relevant Programs and Regulations	4.1-1
	4.1.2 Existing Conditions	4.1-2
	4.1.3 Thresholds of Significance.....	4.1-5
	4.1.4 Regulatory Requirements	4.1-5
	4.1.5 Environmental Impact Analysis.....	4.1-5
	4.1.6 Cumulative Impacts	4.1-11
	4.1.7 Mitigation Measure.....	4.1-12
	4.1.8 Level of Significance After Mitigation	4.1-12
	4.1.9 References.....	4.1-12
4.2	Air Quality	4.2-1
	4.2.1 Relevant Policies and Regulations	4.2-1
	4.2.2 Existing Conditions	4.2-4
	4.2.3 Thresholds of Significance.....	4.2-11
	4.2.4 Project Design Features	4.2-12
	4.2.5 Regulatory Requirements	4.2-13
	4.2.6 Environmental Impact Analysis.....	4.2-14
	4.2.7 Cumulative Impacts	4.2-22
	4.2.8 Mitigation Measures.....	4.2-23
	4.2.9 Level of Significance After Mitigation	4.2-23
	4.2.10 References.....	4.2-23
4.3	Biological Resources	4.3-1
	4.3.1 Relevant Programs and Regulations	4.3-1

4.3.2	<i>Existing Conditions</i>	4.3-4
4.3.3	<i>Thresholds of Significance</i>	4.3-8
4.3.4	<i>Regulatory Requirement</i>	4.3-9
4.3.5	<i>Environmental Impact Analysis</i>	4.3-9
4.3.6	<i>Cumulative Impacts</i>	4.3-11
4.3.7	<i>Mitigation Measures</i>	4.3-12
4.3.8	<i>Level of Significance After Mitigation</i>	4.3-14
4.3.9	<i>References</i>	4.3-15
4.4	<i>Cultural Resources</i>	4.4-1
4.4.1	<i>Relevant Programs and Regulations</i>	4.4-1
4.4.2	<i>Existing Conditions</i>	4.4-6
4.4.3	<i>Thresholds of Significance</i>	4.4-12
4.4.4	<i>Project Design Feature</i>	4.4-13
4.4.5	<i>Regulatory Requirement</i>	4.4-13
4.4.6	<i>Environmental Impact Analysis</i>	4.4-13
4.4.7	<i>Cumulative Impacts</i>	4.4-18
4.4.8	<i>Mitigation Measures</i>	4.4-19
4.4.9	<i>Level of Significance After Mitigation</i>	4.4-20
4.4.10	<i>References</i>	4.4-20
4.5	<i>Geology and Soils</i>	4.5-1
4.5.1	<i>Relevant Programs and Regulations</i>	4.5-1
4.5.2	<i>Existing Conditions</i>	4.5-2
4.5.3	<i>Thresholds of Significance</i>	4.5-4
4.5.4	<i>Regulatory Requirements</i>	4.5-5
4.5.5	<i>Environmental Impact Analysis</i>	4.5-5
4.5.6	<i>Cumulative Impacts</i>	4.5-9
4.5.7	<i>Mitigation Measures</i>	4.5-10
4.5.8	<i>Level of Significance After Mitigation</i>	4.5-10
4.5.9	<i>References</i>	4.5-10
4.6	<i>Greenhouse Gas Emissions</i>	4.6-1
4.6.1	<i>Relevant Policies and Regulations</i>	4.6-1
4.6.2	<i>Existing Conditions</i>	4.6-9
4.6.3	<i>Thresholds of Significance</i>	4.6-11
4.6.4	<i>Project Design Features</i>	4.6-12
4.6.5	<i>Regulatory Requirements</i>	4.6-12
4.6.6	<i>Impact Analysis</i>	4.6-13
4.6.7	<i>Cumulative Impacts</i>	4.6-18
4.6.8	<i>Mitigation Measures</i>	4.6-18
4.6.9	<i>Level of Significance After Mitigation</i>	4.6-18
4.6.10	<i>References</i>	4.6-18
4.7	<i>Hazards and Hazardous Materials</i>	4.7-1
4.7.1	<i>Relevant Programs and Regulations</i>	4.7-1
4.7.2	<i>Existing Conditions</i>	4.7-7
4.7.3	<i>Thresholds of Significance</i>	4.7-11
4.7.4	<i>Regulatory Requirements</i>	4.7-12
4.7.5	<i>Environmental Impact Analysis</i>	4.7-13
4.7.6	<i>Cumulative Impacts</i>	4.7-24
4.7.7	<i>Mitigation Measures</i>	4.7-24
4.7.8	<i>Level of Significance After Mitigation</i>	4.7-25

4.7.9	References.....	4.7-25
4.8	Hydrology and Water Quality.....	4.8-1
4.8.1	Relevant Programs and Regulations.....	4.8-1
4.8.2	Existing Conditions.....	4.8-7
4.8.3	Thresholds of Significance.....	4.8-9
4.8.4	Project Design Features.....	4.8-10
4.8.5	Regulatory Requirements.....	4.8-10
4.8.6	Environmental Impact Analysis.....	4.8-11
4.8.7	Cumulative Impacts.....	4.8-19
4.8.8	Mitigation Measures.....	4.8-20
4.8.9	Level of Significance After Mitigation.....	4.8-20
4.8.10	References.....	4.8-20
4.9	Land Use and Planning.....	4.9-1
4.9.1	Relevant Programs and Regulations.....	4.9-1
4.9.2	Existing Conditions.....	4.9-5
4.9.3	Thresholds of Significance.....	4.9-6
4.9.4	Environmental Impact Analysis.....	4.9-7
4.9.5	Cumulative Impacts.....	4.9-24
4.9.6	Mitigation Measures.....	4.9-24
4.9.7	Level of Significance After Mitigation.....	4.9-24
4.9.8	References.....	4.9-24
4.10	Noise.....	4.10-1
4.10.1	Relevant Policies and Regulations.....	4.10-4
4.10.2	Existing Conditions.....	4.10-9
4.10.3	Thresholds of Significance.....	4.10-9
4.10.4	Project Design Features.....	4.10-10
4.10.5	Regulatory Requirements.....	4.10-10
4.10.6	Impact Analysis.....	4.10-10
4.10.7	Cumulative Impacts.....	4.10-18
4.10.8	Mitigation Measures.....	4.10-19
4.10.9	Level of Significance After Mitigation.....	4.10-19
4.10.10	References.....	4.10-19
4.11	Population and Housing.....	4.11-1
4.11.1	Relevant Programs and Regulations.....	4.11-1
4.11.2	Existing Conditions.....	4.11-1
4.11.3	Thresholds of Significance.....	4.11-6
4.11.4	Environmental Impact Analysis.....	4.11-6
4.11.5	Cumulative Impacts.....	4.11-11
4.11.6	Mitigation Measures.....	4.11-12
4.11.7	Level of Significance After Mitigation.....	4.11-12
4.11.8	References.....	4.11-12
4.12	Public Services and Recreation.....	4.12-1
4.12.1	Relevant Programs and Regulations.....	4.12-1
4.12.2	Existing Conditions.....	4.12-3
4.12.3	Thresholds of Significance.....	4.12-6
4.12.4	Project Design Features.....	4.12-7
4.12.5	Regulatory Requirements.....	4.12-7
4.12.6	Environmental Impact Analysis.....	4.12-8

4.12.7	Cumulative Impacts	4.12-16
4.12.8	Mitigation Measures.....	4.12-17
4.12.9	Level of Significance After Mitigation.....	4.12-17
4.12.10	References.....	4.12-17
4.13	Transportation and Traffic.....	4.13-1
4.13.1	Relevant Programs and Regulations	4.13-4
4.13.2	Existing Conditions	4.13-6
4.13.3	Thresholds of Significance.....	4.13-10
4.13.4	Project Design Features	4.13-11
4.13.5	Regulatory Requirements	4.13-11
4.13.6	Environmental Impact Analysis.....	4.13-12
4.13.7	Cumulative Impacts	4.13-24
4.13.8	Mitigation Measures.....	4.13-25
4.13.9	Level of Significance After Mitigation.....	4.13-25
4.13.10	References.....	4.13-25
4.14	Utilities and Service Systems	4.14-1
4.14.1	Relevant Programs and Regulations	4.14-1
4.14.2	Existing Conditions	4.14-10
4.14.3	Thresholds of Significance.....	4.14-15
4.14.4	Project Design Features	4.14-15
4.14.5	Regulatory Requirements	4.14-16
4.14.6	Environmental Impact Analysis.....	4.14-16
4.14.7	Cumulative Impacts	4.14-34
4.14.8	Mitigation Measures.....	4.14-35
4.14.9	Level of Significance After Mitigation.....	4.14-35
4.14.10	References.....	4.14-35
4.15	Energy	4.15-1
4.15.1	Relevant Programs and Regulations	4.15-1
4.15.2	Existing Conditions	4.15-2
4.15.3	Thresholds of Significance.....	4.15-3
4.15.4	Project Design Features	4.15-4
4.15.5	Regulatory Requirements	4.15-4
4.15.6	Environmental Impact Analysis.....	4.15-4
4.15.7	Cumulative Impacts	4.15-10
4.15.8	Mitigation Measures.....	4.15-11
4.15.9	Level of Significance After Mitigation.....	4.15-11
4.15.10	References.....	4.15-11
Section 5.0	Project Alternatives.....	5-1
5.1	California Environmental Quality Act Requirements for Alternative Analysis	5-1
5.2	Background on Project Alternatives.....	5-2
5.2.1	Jail Plan Evaluation.....	5-2
5.2.2	Context for Alternatives Selection.....	5-4
5.3	Project Goal and Objectives	5-4
5.3.1	County of Los Angeles Strategic Plan	5-4
5.3.2	Project Goal	5-5
5.3.3	Project Objectives.....	5-5

5.4	Summary of the Proposed Project.....	5-6
5.4.1	<i>Significant and Unavoidable Impacts</i>	5-7
5.5	Summary of Alternatives Considered	5-8
5.6	Alternatives Considered and Rejected During the Scoping and Project Planning Process.....	5-9
5.6.1	<i>Alternate Location – Female Inmate Transfer to Existing and Occupied Male Jail Facilities</i>	5-10
5.6.2	<i>Alternate Location – New Women’s Facility at Sybil Brand Institute</i>	5-12
5.6.3	<i>Alternate Location – Building Expansion at CRDF</i>	5-15
5.7	Alternatives Under Consideration	5-18
5.7.1	<i>Alternative 1A: No Project/Continuation of Existing Operations</i>	5-19
5.7.2	<i>Alternative 1B: No Project/Predictable Actions</i>	5-24
5.7.3	<i>Alternative 2: Alternate Location – New Women's Facility at Pitchess Detention Center</i>	5-24
5.7.4	<i>Alternative 3: Alternate Location – New Annex at Century Regional Detention Facility</i>	5-30
5.7.5	<i>Alternative 4: Reduced Mira Loma Women’s Detention Center Capacity – No Expansion</i>	5-37
5.7.6	<i>Alternative 5: Two Separate Women's Facilities (at Mira Loma Detention Center and Pitchess Detention Center South)</i>	5-44
5.8	Environmentally Superior Alternative.....	5-50
5.9	References	5-51
Section 6.0	CEQA Mandated Sections	6-1
6.1	Significant Environmental Effects of the Proposed Project.....	6-1
6.2	Significant Environmental Effects Which Cannot be Avoided if the Proposed Project is Implemented.....	6-3
6.3	Growth-Inducing Impacts.....	6-3
6.4	References	6-8
Section 7.0	List of EIR Preparers and Contributors	7-1
7.1	EIR Preparers	7-1
7.1.1	<i>County of Los Angeles</i>	7-1
7.1.2	<i>BonTerra Psomas</i>	7-1
7.2	Contributors	7-1
7.2.1	<i>DLR Group</i>	7-1
7.2.2	<i>Linscott, Law and Greenspan, Engineers</i>	7-1
7.2.3	<i>GPA Consulting</i>	7-2
7.2.4	<i>Converse Consultants</i>	7-2
7.3	Persons Contacted	7-2

TABLES

<u>Table</u>	<u>Page</u>
ES-1 Alternatives Comparison.....	ES-5
ES-2 Summary of Project Design Features, Regulatory Requirements, and Mitigation Measures.....	ES-8
1-1 Comments on the NOP.....	1-6
2-1 City of Lancaster Cumulative Projects.....	2-8
2-2 County of Los Angeles Cumulative Projects.....	2-12
3-1 County Jail Facility Capacity Overview.....	3-2
3-2 Proposed Facilities and Sizes.....	3-7
3-3 Building Renovation, Reuse and Function.....	3-21
3-4 Estimated Construction Schedule.....	3-22
3-5 Visitation Protocol Comparison.....	3-24
4.2-1 California and National Ambient Air Quality Standards.....	4.2-2
4.2-2 Air Quality Levels Measured at the Lancaster Monitoring Station.....	4.2-7
4.2-3 Designations of Criteria Pollutants in the Antelope Valley Portion of the Mojave Desert Air Basin.....	4.2-8
4.2-4 AVAQMD Criteria Pollutant Significant Emissions Thresholds.....	4.2-11
4.2-5 Estimated Annual Peak Daily Construction Emissions (Lbs/Day).....	4.2-16
4.2-6 Estimated Annual Total Construction Emissions (tons).....	4.2-16
4.2-7 Estimated annual Operational Emissions (tons).....	4.2-17
4.3-1 Special Status Wildlife Species Known to Occur in the Project Vicinity.....	4.3-7
4.4-1 Cultural Resources Studies Completed in the Project Vicinity.....	4.4-9
4.4-2 Cultural Resources Sites Near the Project Site.....	4.4-10
4.4-3 Summary of Historical Resource Evaluation.....	4.4-13
4.6-1 Comparison of Worldwide GHG Emissions.....	4.6-11
4.6-2 Estimated Construction Annual GHG Emissions.....	4.6-14
4.6-3 Estimated Operational Annual GHG Emissions.....	4.6-15
4.6-4 Estimated Total Annual GHG Emissions.....	4.6-16
4.7-1 Asbestos and Lead Sampling.....	4.7-9
4.8-1 Historic Well Production.....	4.8-9
4.9-1 Lancaster General Plan Consistency.....	4.9-8
4.9-2 County General Plan Consistency.....	4.9-13
4.9-3 Regional Comprehensive Plan Consistency.....	4.9-17
4.9-4 Regional Transportation Plan/Sustainable Communities Strategy Consistency.....	4.9-22
4.10-1 Noise Levels for Common Activities.....	4.10-2
4.10-2 California Land Use Compatibility Guidelines.....	4.10-4
4.10-3 County of Los Angeles Construction Equipment Noise Limits.....	4.10-7
4.10-4 County of Los Angeles Exterior Noise Standards.....	4.10-7
4.10-5 Typical Maximum Construction Noise Levels.....	4.10-11
4.10-6 Vibrations Levels During Construction.....	4.10-16
4.10-7 Guideline Vibration Damage Potential Threshold Criteria.....	4.10-16
4.11-1 County of Los Angeles Population Growth 2010–2015.....	4.11-1
4.11-2 City of Lancaster Population Growth 2010–2015.....	4.11-2
4.11-3 County Employment Growth 2007–2012.....	4.11-3
4.11-4 Lancaster Employment Growth 2007–2012.....	4.11-4
4.11-5 Jobs Housing Ratios (2012).....	4.11-5
4.11-6 Growth Projections.....	4.11-5
4.11-7 Projected Jobs/Housing Ratio.....	4.11-6
4.12-1 Fire Stations in the Project Area.....	4.12-3
4.13-1 Level of Service Definitions.....	4.13-1

4.13-2	Existing Traffic Volumes	4.13-8
4.13-3	Existing Intersection LOS.....	4.13-9
4.13-4	Project Trip Generation.....	4.13-15
4.13-5	Existing Plus Project Intersection Level Of Service	4.13-16
4.13-6	Year 2019 Future Pre-Project Intersection Level Of Service	4.13-17
4.13-7	Year 2019 Future Plus Project Intersection Level Of Service	4.13-18
4.13-8	Freeway Off-Ramp Vehicle Queuing ^a	4.13-19
4.14-1	Historic Water Use	4.14-11
4.14-2	Waterworks District No. 40 Water Supply	4.14-12
4.14-3	Historic Imports from the State Water Project.....	4.14-13
4.14-4	Waterworks District No. 40 Demand Projections	4.14-22
4.14-5	Waterworks District No. 40 Supply Projections.....	4.14-24
4.14-6	Revised Waterworks District No. 40 Demand and Supply Projections	4.14-25
4.14-7	LACWWD 40 Projected Water Demand and Supply Single Dry Year (AFY).....	4.14-26
4.14-8	LACWWD 40 Projected Water Demand and Supply Multiple Dry Water Years – 2016 to 2020 (AFY).....	4.14-27
4.14-9	LACWWD 40 Projected Water Demand and Supply Multiple Dry Water Years – 2021 to 2025 (AFY).....	4.14-27
4.14-10	LACWWD 40 Projected Water Demand and Supply Multiple Dry Water Years – 2026 to 2030 (AFY).....	4.14-28
4.14-11	LACWWD 40 Projected Water Demand and Supply Multiple Dry Water Years – 2031 to 2035 (AFY).....	4.14-28
4.15-1	Estimated Annual Energy Use	4.15-6
5-1	Jail Plan Report Summary of Options.....	5-2
5-2	County Detention Center and Jail Evaluation	5-10
5-3	Alternate Location – Evaluation of Female Inmate Transfer to Existing and Occupied Male Jail Facilities and Project Objectives.....	5-11
5-4	Evaluation of the Project Objectives and an Alternate Location – A New Women’s Facility at Sybil Brand Institute.....	5-14
5-5	Evaluation of the Project Objectives and An Alternate Location – Building Expansion AT CRDF.....	5-16
5-6	Summary of Alternative 1A Impacts.....	5-22
5-7	Evaluation of the Project Objectives and Alternative 1A: No Project/Continuation of Existing Operations	5-22
5-8	Summary of Alternative 2 Impacts	5-28
5-9	Evaluation of the Project Objectives and Alternative 2: Alternate Location – New Women’s Facility at PDC	5-29
5-10	Summary of Alternative 3 Impacts	5-34
5-11	Evaluation of the Project Objectives and Alternative 3: Alternate Location – New Annex at CRDF.....	5-35
5-12	Summary of Alternative 4 Impacts	5-41
5-13	Evaluation of the Project Objectives and Alternative 4 – Reduced MLWDC Capacity – No Expansion.....	5-42
5-14	Summary of Alternative 5 Impacts	5-48
5-15	Evaluation of the Project Objectives and Alternative 5 – Two Separate Facilities (at MLDC and PDC South)	5-49

EXHIBITS

<u>Exhibit</u>	<u>Follows Page</u>
2-1	Regional Location and Local Vicinity2-1
2-2	Aerial Photograph of Land Uses2-1
2-3	Existing MLDC Facilities2-3
2-4	City of Lancaster Cumulative Project Locations2-12
2-5	County of Los Angeles Cumulative Project Locations2-12
3-1	Proposed Site Plan3-6
3-2	New Construction and Major/Minor Renovation3-8
3-3	Recreation and Circulation.....3-10
4.1-1a	On-Site Photographs4.1-3
4.1-1b	On-Site Photographs4.1-3
4.1-1c	On-Site Photographs4.1-3
4.1-1d	On-Site Photographs4.1-3
4.1-2a	Off-Site Photographs4.1-3
4.1-2b	Off-Site Photographs4.1-3
4.4-1	Historic Evaluation Study Area4.4-13
4.4-2	Evaluated Resources.....4.4-13
4.4-3	Historic District Contributors4.4-15
4.5-1	Fault Map.....4.5-1
4.5-2	Seismic Hazard Zones.....4.5-1
4.5-3	Geologic Map.....4.5-3
4.8-1	Existing On-Site Drainage Patterns4.8-7
4.8-2	Proposed Stormwater Treatment BMPs4.8-12
4.8-3	Flood Hazards4.8-17
4.9-1	City of Lancaster General Plan Land Use Designation.....4.9-5
4.9-2	City of Lancaster Zoning.....4.9-5
4.13-1	Existing Lane Configurations4.13-7
4.13-2	Existing AM Peak Hour Volumes4.13-8
4.13-3	Existing PM Peak Hour Volumes4.13-8
4.13-4	Project-related AM Peak Hour Traffic Volumes4.13-15
4.13-5	Project-related PM Peak Hour Traffic Volumes4.13-15
4.13-6	Year 2019 Future with Project AM Peak Hour Traffic Volumes4.13-18
4.13-7	Year 2019 Future with Project PM Peak Hour Traffic Volumes4.13-18
4.14-1	Existing Wet Utility Infrastructure4.14-10
4.14-2	Existing Dry Utility Infrastructure.....4.14-10
4.14-3	Proposed Water Infrastructure.....4.14-17
4.14-4	Proposed Sewer Infrastructure4.14-18
5-1	Alternative 2: Conceptual Design for a New Women's Facility at Pitchess Detention Center.....5-24
5-2	Alternative 3: Aerial Photograph of CRDF5-31

APPENDICES

Appendix

- A-1 Initial Study and Notice of Preparation
- A-2 Comments on the NOP
- A-3 Scoping Meeting Sign-in Sheets and Meeting Presentation
- A-4 County of Los Angeles Jail Plan
- B CalEEMod Inputs and Data
- C-1 Historical Resource Report
- C-2 Cultural Resources Records Search and Paleontological Resources Records Search
- C-3 Native American Consultation
- D Geohazard Study Report
- E-1 Phase I Environmental Site Assessment Report
- E-2 Asbestos and Lead-Based Paint Survey Report
- E-3 Phase II Environmental Site Assessment
- F-1 Hydraulics/Hydrology and Site Storm Drainage System
- F-2 Preliminary Site Water Supply and Distribution Analysis Narrative
- F-3 Evaluation Report and Peer Review of Sanitary and Stormwater Utilities
- G-1 Public Service and Utility Providers Correspondence
- G-2 Water Supply Assessment
- H Traffic Impact Study
- I Consultant Resumes

EXECUTIVE SUMMARY

INTRODUCTION

This Draft Environmental Impact Report (EIR) has been prepared to identify the potential environmental effects associated with the approval and implementation of the proposed Mira Loma Women's Detention Center (MLWDC) Project (Project). The Project proposes the reuse, renovation and expansion of a portion of the currently unoccupied and County-owned Mira Loma Detention Center (MLDC) through the rehabilitation of existing structures and the construction of new structures. The Project will provide a total of 1,604 beds for eligible low- to medium-security female inmates, as well as related support facilities to accommodate programs such as general education classes, computer training, vocational career technical education, career counseling, a learning resource center, culinary classes, and indoor/outdoor recreation for inmates.

As the approval and implementation of the MLWDC has the potential to cause physical changes in the environment, it is considered a "Project", as defined by Section 21065 of the California Environmental Quality Act (CEQA) and Section 15378 of the State CEQA Guidelines, and thus is subject to CEQA's requirements. In accordance with Section 15051 of the State CEQA Guidelines, the Lead Agency is the public agency with the greatest responsibility for carrying out or approving a project. The County of Los Angeles has the primary responsibility for the approval, construction, and operation of the MLWDC. Therefore, the County is serving as the Lead Agency for the Project and is responsible for the Project's environmental review, pursuant to Section 15040 of the State CEQA Guidelines.

This EIR has been prepared pursuant to the requirements of CEQA and the State CEQA Guidelines. This EIR (1) discloses the potentially significant adverse environmental impacts of the Project; (2) identifies measures that will be effective in reducing or avoiding any identified significant adverse impacts; (3) analyzes feasible alternatives to the Project; and (4) facilitates interagency coordination and public review. The EIR concludes that, with the implementation of the mitigation measures described in this document, the Project will not result in any significant environmental impacts.

PROJECT SUMMARY

PROJECT LOCATION AND SETTING

The Project site is located in northern Los Angeles County in the Antelope Valley within the City of Lancaster, which is approximately 70 miles north of downtown Los Angeles and immediately north of the City of Palmdale. The Project site is located at 45100 60th Street West, on the southeast corner of West Avenue I and 60th Street West. The Project will occupy a 46-acre portion of the existing MLDC property and facilities, which is currently not occupied by inmates or serving any detention functions.

Primary vehicular access to the Project site is from 60th Street West via West Avenue I, which connects to the north-south Antelope Valley Freeway (State Route [SR] 14). SR-14 provides access to the area's major cities of Lancaster, Palmdale, and Santa Clarita, and the greater Los Angeles area to the south via Interstate (I) 5. The Antelope Valley Line of the Metrolink commuter rail system runs generally parallel to the SR-14 and connects the Antelope Valley cities to Santa Clarita, Newhall, Sylmar, Sun Valley, Burbank, Glendale, and downtown Los Angeles. The Lancaster Metrolink Station is located approximately six miles east of the Project site.

The Project site is located within approximately 355 acres of County-owned property, which includes various facilities, including the MLDC; the former High Desert Health System Multi-

Ambulatory Care Center (HDHS MACC); a County-operated solar energy facility; the County Probation Department's Challenger Memorial Youth Center (CMYC); and the County Animal Care and Control – Lancaster Shelter. The Bachelor Officer's Quarters (BOQ) is a part of the MLDC and is located on the west side of 60th Street West, across from the main MLDC property. The northern portion of the block, including the Project site, is owned by the County and is not subject to regulation by the Lancaster General Plan or Zoning Ordinance. Located south of the County-owned property is approximately 262 acres of property owned by the State of California for the California State Prison, Los Angeles County.

The MLDC has been in operation as a detention center since 1945-46, when the California Youth Authority began to run a vocational school at the site, which focused on job training for juvenile offenders. In the mid 1950's, the MLDC operated as a medium-security facility until it ceased operations for the first time in 1979. It reopened in 1983 and was expanded with the construction of several new buildings in 1986. The facility was repurposed for female inmates and was known as the Mira Loma Female Honor Ranch, but was closed again in 1993. The MLDC reopened for use in 1997 by the U.S. Immigration and Customs Enforcement (ICE) to house illegal immigrants until their immigration cases were decided, and it operated in that capacity until 2012. The site has not housed inmates since that time.

PROJECT DESCRIPTION

The Project site includes 46 acres of the MLDC property. The MLWDC Project involves the reuse, renovation, and expansion of the majority of the currently unoccupied MLDC property to provide a total of 1,604 beds for low- to medium security female inmates. The MLWDC Project proposes the adaptive reuse, renovation, and expansion of the majority of the buildings at MLDC. Some buildings will be demolished to accommodate the new site plan, which includes new building and facility construction. The majority of the buildings will be renovated and/or expanded, making use of the majority of the existing buildings and infrastructure on the Project site.

The MLWDC Project will provide detention services within a secured custody setting (e.g., security fencing, guard towers). The Project will include dormitory housing in twinned barracks (896 beds), single barracks (68 beds), new transitional housing (384 beds), and barracks E and F (256 beds), along with facilities for other support services (e.g., administration, visitation, kitchen, inmate processing, laundry, medical, education, recreation, and maintenance). In total, the Project will include approximately 365,210 gross square feet (gsf) of building space.

Of the total outdoor areas proposed on site, approximately 428,000 square feet (sf, i.e., 46.4 percent) will be pervious (e.g. soil or landscaped) and approximately 494,150 sf (53.6 percent) will be paved, including buildings, roadways and sidewalks. Within the secured and fenced property, approximately 63,400 square feet will be set aside for outdoor recreational activities and program space that will be accessible to the female inmates (e.g. sports courts and recreation fields, gardens, courtyards-passive recreational areas).

The Project is designed to deliver a more normative environment than the current detention facilities housing women to assist in the transition of eligible female inmates from detention to release into independent living. To provide for an education-based incarceration, the Project will offer general education classes, computer training, general and vocational career technical education, career counseling, college courses, a learning resource center, culinary classes, and indoor/outdoor recreation for inmates. All facilities will be enclosed within secured and guarded perimeter fencing.

In order to meet the standards of the Board of State and Community Corrections (BSCC) and long-term occupancy at MLWDC, utility and infrastructure repairs and upgrades will be required

to the Project site's water infrastructure; sewer infrastructure; storm drain infrastructure; heating, ventilation, air conditioning (HVAC) system; and electrical facilities. A new water line connection will be required to link the Project site to the Los Angeles County Waterworks District 40 water line within West Avenue I. Water service from the existing on-site water wells and storage tanks will be disconnected.

Upon completion of the Project, low- to medium-security female inmates will be transferred to the Project site from their current detention facility, which is now the Century Regional Detention Facility (CRDF) in Lynwood. The County's remaining female inmate population, who are not in low- to medium-security classifications, or who require medical or other services not available at the Project site, will be housed at other jail facilities that have appropriate services to meet their needs.

The Project will be staffed by approximately 523 employees in total, with approximately 225 employees during the AM shift (6:00 AM to 2:00 PM); approximately 177 employees during the PM shift (2:00 PM to 10:00 PM); and approximately 121 employees during the EM shift (10:00 PM to 6:00 AM). This will include Los Angeles Sheriff's Department (LASD) security/sworn staff, LASD civilian staff, teachers, counselors, maintenance personnel, physicians, registered nurses, registered nurse practitioners, and other County employees and contractors. A number of community-based volunteers are also anticipated at the site to provide training and assist with visitation.

PROJECT ALTERNATIVES

In accordance with Section 15126.6 of the State CEQA Guidelines, Section 5.0 of this EIR, Alternatives, includes a discussion of feasible alternatives and the comparative merits of the alternatives, and also summarizes several potential alternatives that were considered and rejected during the scoping and project planning process for the Project. This EIR includes an evaluation of the following alternatives:

- **Alternative 1A. No Project/Continuation of Existing Operations:** Alternative 1A assumes the MLDC site would remain in its existing unoccupied condition and no renovation or new construction would occur, and no new use or activity would occur within the site. Thus, existing vacant structures and environmental conditions at the site would remain the same and the existing and future female inmate population would continue to be housed primarily at the CRDF.
- **Alternative 1B. No Project/Predictable Actions:** Alternative 1B assumes that if the proposed Project did not proceed, the County would eventually put the MLDC property to use in some form. The County could choose to sell the MLDC property for redevelopment by another entity or could choose to demolish the facilities for County reuse for a non-detention facility purpose. The existing and future female inmate population would continue to be housed primarily at the CRDF.
- **Alternative 2. Alternate Location – New Women's Facility at Pitchess Detention Center:** Alternative 2 proposes the construction of a new women's detention facility on a largely undeveloped portion of the secured PDC. Alternative 2 would require the demolition of a few structures and development of approximately 21 acres to allow the construction and operation of a new facility. The new PDC facility would provide a 1,156-bed low-to medium-security, rehabilitation-based, female inmate detention facility with a 26-bed medical clinic and appurtenant facilities, and a parking garage for staff. Not all eligible female inmates could be accommodated at the site, requiring the remaining females to be at CRDF, thereby requiring CRDF to become a mixed male/female facility.

- **Alternative 3. Alternate Location – New Annex at Century Regional Detention Facility:** Alternative 3 proposes to retain the female inmate population at CRDF and expand the existing facility to provide building space for the EBI and GRR model programming. A new three-story annex building would include 25,000 square feet of floor area and would be constructed in the landscaped area between existing buildings. The facility would include six treatment rooms, four classrooms, and support areas to accommodate staff and health professionals involved in the treatment and provision of medical, mental health, and substance abuse services, as well as provide educational and vocational training to inmates. The facility would include space for contact visiting; a rooftop recreation area; and a 17,500-square-foot outdoor visiting area at the center of the CRDF.
- **Alternative 4. Reduced Mira Loma Women's Detention Center Capacity – No Expansion:** Alternative 4 proposes for the reuse of the MLDC site with no expansion of capacity and no new building construction. Under Alternative 4, the existing facilities at MLDC would be upgraded to make the facility operational. Improvements would include kitchen upgrades, restroom repairs, upgrades to Barracks E and F, new heating/cooling systems, new communications through a central control, and connection to the LACWWD40 water line and supplies. Approximately 880 low- to medium-level security female inmates would then be transferred from the CRDF to the MLDC. Not all eligible female inmates could be accommodated at the site, requiring the remaining females to be at CRDF, thereby requiring CRDF to be a mixed male/female facility.
- **Alternative 5: Two Separate Women's Facilities- Mira Loma Detention Center and Pitchess Detention Center South.** Alternative 5 proposes that two of the County's existing detention facilities would be reused to house qualifying low- to medium-security level female inmates. This alternative assumes that approximately 880 female inmates would be housed at the MLDC and up to 846 female inmates would be at PDC South. This would allow for the accommodation of an increased qualifying female population of up to 1,726 beds when compared to the proposed Project's capacity of 1,604 beds. Repairs to MLDC to accommodate 880 female inmates would be exactly the same as set forth in Alternative 4. Because PDC South is currently occupied, it requires few physical improvements to serve the qualifying female population. The male inmates currently housed within PDC South, which averaged 1,499 in 2014, would be transferred to the CRDF, which is designed for male inmates and would have capacity once the female inmates were transferred to MLDC and PDC South.

Table ES-1 compares the various alternatives.

**TABLE ES-1
ALTERNATIVES COMPARISON**

Alternative	Capacity (beds)	Proposed Improvements	
		Rehabilitation	New Construction
Proposed Project	1,604 new beds	Major or minor remodeling to all buildings- minor demolition	Barracks G/H, Main Control (51), Medical/IPA (52), Laundry-Warehouse (53), Gate House (54), Restroom (56), Parking Lot
Alternative 1A/1B: No Project	0 new beds	None	None
Alternative 2: Alternate Location- New Women's Facility at PDC	1,156 new beds	Minor demolition and no renovation	New construction of all buildings
Alternative 3: Alternate Location- New Annex at CRDF	1,588 existing beds 0 new beds	No renovation	Construction of new annex facility and outdoor visitation area
Alternative 4: Reduced MLWDC Capacity—No expansion	880 new beds	Reuse of MLDC	No new building construction
Alternative 5: Two Separate Women's Facilities (MLDC and PDC South)	1,726 beds (880 new beds and 846 existing beds)	Reuse of MLDC and PDC South	No new building construction
PDC: Pitchess Detention Center; CRDF: Century Regional Detention Facility; MLWDC: Mira Loma Women's Detention Center; MLDC: Mira Loma Detention Center			

As required by CEQA, the environmentally superior alternative should be identified. If the No Project Alternative is selected as environmentally superior, then the EIR shall also identify another environmentally superior alternative among the other alternatives.

The analysis in Section 5.0 of this EIR shows that Alternative 1A – No Project/Continuation of Existing Operations would be considered environmentally superior because no changes or improvements to existing detention facilities or County operations that may result in environmental changes would occur. While Alternative 1A would result in fewer environmental impacts than the Project on most environmental issues, this alternative would not meet the majority of the Project's basic objectives.

Aside from the No Project Alternative 1A, all other alternatives considered would result in less than significant impacts to the environment after mitigation, similar to the proposed MLWDC Project. None of the alternatives to the Project would be considered environmentally superior when compared to the other.

ISSUES TO BE RESOLVED

Section 15123(b)(3) of the State CEQA Guidelines requires that an EIR contain a discussion of issues to be resolved. With respect to the proposed MLWDC Project, the key issue to be resolved is whether the alternatives to the Project would be preferable to the County, and would lessen any of the significant impacts and still achieve most of the Project objectives.

AREAS OF KNOWN CONTROVERSY

Section 15123(b)(2) of the State CEQA Guidelines indicates that an EIR summary should identify areas of controversy known to the Lead Agency, including issues raised by other agencies and the public.

During the scoping process for the EIR, the County received comments that identified environmental issues to be addressed in the EIR. This EIR has taken into consideration the comments received from the public, various agencies, and interested parties in response to the Notice of Preparation (NOP) that was circulated on September 5, 2014, and comments raised during the Scoping Meeting held on September 18, 2014. These comment letters are listed in Table 1-1 in Section 1.3.2, Scoping Process, of this Draft EIR. Environmental issues that were raised in these comments are addressed in Section 4.0, Environmental Analysis, of this EIR.

When considering comments received during the NOP review period from agencies and individuals, the discussions held during the Scoping Meeting, as well as public testimony provided at various County of Los Angeles Board of Supervisors (BOS) meetings held throughout 2014-15, the primary areas of known controversy related to environmental concerns at the time of the issuance of Notice of Availability (NOA) for the Draft EIR include, but are not limited to:

- opposition to the expansion of any jail facilities in the County and opposition to incarceration in general, in favor of social and diversion programs;
- decreased accessibility for families/visitors due to distance from urban Los Angeles area;
- increase in travel miles to the Antelope Valley and associated increase in traffic, impacts to public transportation, and vehicle emissions;
- increase in population growth, requiring additional public services, schools, and utilities;
- increase in noise (e.g. construction, alarms, firing range);
- deteriorated condition of MLDC buildings;
- impacts to historic resources related to the Polaris Flight Academy and impacts to Native American resources;
- placement of inmates in the Antelope Valley due to air quality concerns (e.g. particulates and ozone) and potential exposure to Valley Fever spores through fugitive dust;
- placement of inmates on former Polaris Flight Academy, which operated as a hazardous waste generator; and
- groundwater overdraft, drought, and increase in demand for groundwater resources in the Antelope Valley.

SUMMARY OF ENVIRONMENTAL IMPACTS

The Project's Initial Study indicated that the Project will have no impacts on Agriculture and Forest Resources, or on Mineral Resources, and that no further analysis in this Draft EIR is required. The Initial Study is located in Appendix A-1 of this EIR.

The analysis presented in Sections 4.1 through 4.15 of this EIR evaluates the impacts associated with Project implementation. The Project Design Features (PDFs) are specific design elements incorporated into the Project or standard procedures and reflected in the Project's construction specifications and final plans, which are implemented in accordance with County protocol to prevent the occurrence of, or reduce the significance of, potential environmental effects.

Regulatory Requirements (RRs) are applicable local, State, or federal regulations. PDFs and RRs, as further discussed in Section 4.0, Environmental Analysis, are listed in Table ES-2. Implementation of the PDFs and compliance with RRs will result in the Project having no impact or less than significant impacts on Air Quality; Geology and Soils; Greenhouse Gases; Hydrology and Water Quality; Land Use and Planning; Population, Housing, and Employment; Public Services and Recreation; Transportation and Traffic; and Energy.

Prior to mitigation, Project implementation will result in potentially significant impacts to Aesthetics, Biological Resources, Cultural Resources, Hazards and Hazardous Materials, Noise, and Utilities and Services Systems. However, mitigation measures (MMs) have been developed to avoid or reduce these impacts to levels considered less than significant. No significant unavoidable impacts will occur after mitigation.

Table ES-2 provides a list of the PDFs, RRs, and MMs for the Project together for convenience. As only applicable to the MMs, the potentially significant environmental effects of the Project in the first column, the corresponding MMs for each environmental impact are listed in the second column and the level of significance after implementation of the MMs is provided in the third column. Requirements listed in Table ES-2 will be included in the Design-Build Contractor's contract-related documents and in the Mitigation Monitoring and Reporting Program (MMRP), which is required under Section 21081.6 of CEQA and Section 15097 of the State CEQA Guidelines.

The MMRP for the Project will be developed prior to the approval of the Project, for consideration of approval by the County Board of Supervisors as part of Project. Specific reporting and/or monitoring requirements in the MMRP will be enforced during construction and/or operation, as applicable, of the Project to ensure the implementation of MMs.

.

**TABLE ES-2
SUMMARY OF PROJECT DESIGN FEATURES, REGULATORY REQUIREMENTS,
AND MITIGATION MEASURES**

Potentially Significant Impact	Project Design Features, Regulatory Requirements, and Mitigation Measures	Level of Significance After Mitigation
Section 4.1 Aesthetics		
RR AES-1 Proposed off-site improvements within the public right-of-way will comply with applicable standards in the City of Lancaster's Design Guidelines as they relate to streetscape design for sidewalks and parkways.		
Project implementation has the potential for substantial light that could adversely affect day or nighttime views in the area.	MM AES-1 A Lighting Plan shall be prepared that depicts the locations of lighting fixtures, types of fixtures, mounting heights, and aiming directions to be installed on the Project site. The Lighting Plan shall ensure that sensitive receptors on adjacent properties would not be significantly adversely affected by light spillover, while also ensuring that lighting levels meet the security requirements for the MLWDC. The Lighting Plan shall be provided to the Los Angeles County Director of Public Works (DPW) to confirm its findings prior to the commencement of any on-site or off-site demolition/construction activities. Upon approval of the Lighting Plan by DPW, the Project shall be implemented in compliance with the Plan.	Less than significant.
Section 4.2 Air Quality		
<p>PDF AIR-1 The following administrative controls and hazard awareness actions will be included in the Contractor's Specifications:</p> <ol style="list-style-type: none"> 1. Prior to Project construction initiation, and for any personnel additions after Project construction initiation, the County's contractor shall be informed of the following California Department of Public Health (CDPH) materials on Valley Fever, or any updated materials as applicable, will be distributed to worksite supervisors: <ol style="list-style-type: none"> i. CDPH pamphlet entitled "Preventing Work-Related Coccidiomycosis (Valley Fever)" available at: http://www.cdph.ca.gov/programs/hesis/Documents/CocciFact.pdf. (CDPH 2013a) 2. Prior to Project construction initiation, and for any personnel additions after Project construction initiation, the County's contractor shall be informed of the following CDPH materials on Valley Fever, as well as any updated materials as applicable, will be distributed to construction workers: <ol style="list-style-type: none"> i. CDPH pamphlet entitled "Valley Fever Fact Sheet" available at: http://www.cdph.ca.gov/HealthInfo/discond/Documents/VFGeneral.pdf. (CDPH 2013b) ii. CDPH pamphlet entitled "Hoja de datos de la Fiebre del Valle (Valley Fever Fact Sheet in Spanish)" available at: http://www.cdph.ca.gov/HealthInfo/discond/Documents/HojaDeDatosDeLaFiebreDelValle.pdf (CDPH 2013c) iii. CDPH pamphlet entitled "Fact Sheet Valley Fever (Valley Fever Fact Sheet in Tagalog)," available at: http://www.cdph.ca.gov/HealthInfo/discond/Documents/TagalogGeneralValleyFeverFactSheet.pdf (CDPH 2013d). 		

**TABLE ES-2
SUMMARY OF PROJECT DESIGN FEATURES, REGULATORY REQUIREMENTS,
AND MITIGATION MEASURES**

Potentially Significant Impact	Project Design Features, Regulatory Requirements, and Mitigation Measures	Level of Significance After Mitigation
<p>PDF AIR-2</p>	<p>The Contractor's Specifications will be required to comply with County's Specifications No. 7266, which require best management practices for construction activities. These Best Management Practices include:</p> <ul style="list-style-type: none"> • Eroded sediments and other pollutants must be retained on site and may not be transported from the site via sheetflow, swales, area drains, natural drainage courses or wind. • Stockpiles of earth and other construction related materials must be protected from being transported from the site by the forces of wind or water. • Fuels, oils, solvents and other toxic materials must be stored in accordance with their listing and are not to contaminate the soil and surface waters. All approved storage containers are to be protected from the weather. Spills must be cleaned up immediately and disposed of in a proper manner. Spills may not be washed into the drainage system. • Excess or waste concrete may not be washed into the public way or any other drainage system. Provisions shall be made to retain concrete waste on sites until they can be disposed of as solid waste. • Trash and construction related solid wastes must be deposited into a covered receptacle to prevent contamination of rainwater and dispersal by wind. • Sediments and other materials may not be tracked from the site by vehicle traffic. The construction entrance roadways must be stabilized so as to inhibit sediments from being deposited into the public way. Accidental depositions must be swept up immediately and may not be washed down by rain or other means. • Any slopes with disturbed soils or denuded of vegetation must be stabilized so as to inhibit erosion by wind and water 	
<p>PDF AIR-3</p>	<p>The Contractor's Specifications will require that on-site gardening activities will be conducted in contained raised beds only and will be filled with imported soils derived from outside the Antelope and Kern Valleys so that inmates would not be interacting directly with local soils</p>	
<p>RR AIR-1</p>	<p>All construction activities will be conducted in compliance with any applicable AVAQMD rules and regulations, including but not limited to the following:</p> <ul style="list-style-type: none"> • Rule 403, Fugitive Dust, for controlling fugitive dust and avoiding nuisance. • Rule 402, Nuisance, which states that a Project shall not "discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property". • Rule 1113, which limits the volatile organic compound content of architectural coatings. • Rules 201, 203 and 219, which regulate permits for installation and use of equipment that may generate air contaminants, such of commercial kitchen equipment and emergency generators. 	

**TABLE ES-2
SUMMARY OF PROJECT DESIGN FEATURES, REGULATORY REQUIREMENTS,
AND MITIGATION MEASURES**

Potentially Significant Impact	Project Design Features, Regulatory Requirements, and Mitigation Measures	Level of Significance After Mitigation
RR AIR-2	All construction activities will be conducted in compliance with Department of Health -Infection Control Policy Guidelines Procedure No.918.01, which requires that building additions, demolition, retrofit, alterations, new construction comply with the Infection Control Policy.	
RR AIR-3	All construction activities will be conducted in compliance with 13 CCR §2485, which requires that all diesel-fueled commercial motor vehicles must not idle for more than 5 consecutive minutes at any location.	
Section 4.3 Biological Resources		
Project implementation has the potential for short-term construction impacts that may result in the removal/demolition of potentially occupied bat maternity roosts.	MM BIO-1 Prior to commencement of construction activities, a qualified Biologist shall conduct a pre-construction bat habitat assessment of the trees and/or structures marked for potential removal/demolition. Potential for roosting shall be categorized by (1) potential for solitary roost sites and (2) potential for colonial roost sites (i.e., ten bats or more). If the potential for colonial roosting is determined, those trees/structures shall not be removed during the bat maternity roost season (March 1 to July 31). Trees potentially supporting colonial roosts outside the maternity roost season, and trees potentially supporting solitary roosts, may be removed via a two-step removal process whereby, at the direction of the Biologist, some level of disturbance (such as trimming of lower branches) is applied to the tree on the day prior to removal to allow bats to escape during the darker hours, and the roost tree shall be removed the following day (i.e., there shall be no less or more than one night between initial disturbance and the grading or tree removal). Structures potentially supporting colonial roosts outside the maternity roost season and structures potentially supporting solitary roosts may be fitted with a bat exclusionary device at the entry location, whereby bats are allowed to leave the structure but are unable to return. The structure can be demolished the following day. The results of the pre-construction bat habitat assessment, and any measures taken to protect bats, shall be documented and provided to the Los Angeles County Department of Public Works.	Less than significant impact.
Project implementation has the potential to adversely impact active bird/raptor nests either directly or indirectly during Project construction	MM BIO-2 The Project shall be conducted in compliance with the conditions set forth in the Migratory Bird Treaty Act (MBTA) and California Fish and Game Code with methods accepted by the U.S. Fish and Wildlife Service (USFWS) and the California Department of Fish and Wildlife (CDFW) to protect active bird/raptor nests. To the extent feasible, vegetation/tree removal shall occur during the non-breeding season for nesting birds (generally late September to early March) and nesting raptors (generally early July to late January) to avoid impacts to nesting birds and raptors. If the nature of the Project requires that work be initiated during the breeding season for nesting birds and raptors (February 1 to August 31), a pre-construction survey shall be conducted by a qualified Biologist (i.e. one with experience conducting nesting bird surveys) for nesting birds and raptors within 3 days prior to clearing of any vegetation and/or any work near existing structures (i.e., within 300 feet for nesting birds, within 300 feet for nesting special status birds, and within 500 feet for nesting raptors). If the Biologist does not	Less than significant impact.

**TABLE ES-2
SUMMARY OF PROJECT DESIGN FEATURES, REGULATORY REQUIREMENTS,
AND MITIGATION MEASURES**

Potentially Significant Impact	Project Design Features, Regulatory Requirements, and Mitigation Measures	Level of Significance After Mitigation
	<p>find any active nests within or immediately adjacent to the impact area, the vegetation clearing/construction work shall be allowed to proceed. A letter report shall be prepared and submitted to the Los Angeles County Department of Public Works to document the survey findings and recommended protective measures.</p> <p>If the Biologist finds an active nest within or immediately adjacent to the construction area and determines that the nest may be impacted or breeding activities substantially disrupted, the Biologist shall delineate an appropriate buffer zone around the nest depending on the sensitivity of the species and the nature of the construction activity. Any nest found during survey efforts shall be mapped on the construction plans. The active nest shall be protected until nesting activity has ended. To protect any nest site, the following restrictions to construction activities shall be required until nests are no longer active, as determined by a qualified Biologist: (1) clearing limits shall be established within a buffer around any occupied nest (the buffer shall be 25–300 feet for nesting birds and 300–500 feet for nesting raptors), unless otherwise determined by a qualified Biologist and (2) access and surveying shall be restricted within the buffer of any occupied nest, unless otherwise determined by a qualified Biologist. Encroachment into the buffer area around a known nest shall only be allowed if the Biologist determines that the proposed activity would not disturb the nest occupants. Flagging, stakes, and/or construction fencing shall be used to demarcate the buffer around the nest and construction personnel shall be instructed as to the sensitivity of the area. Construction will be allowed to proceed when the qualified Biologist has determined that fledglings have left the nest or the nest has failed.</p>	
<p>The Project has the potential to disturb soils within a jurisdictional drainage, potentially impacting waters of the State.</p>	<p>MM BIO-3 If MLWDC implementation, including potential off-site trenching for the water line connection (temporary) and/or off-site construction of a storm drain outlet (permanent), would result in discharge to jurisdictional features, the County shall consult with the CDFW and the RWQCB to determine if the agency will consider the feature to be within their jurisdiction and require regulatory permits. If an agency indicates that the feature will not be regulated and no permit is required, no further action will be required for that agency. If an agency indicates that the feature will be regulated and permits are required, the balance of this Mitigation Measure, described below, shall be implemented prior to initiation of Project activities.</p> <p>Prior to initiation of Project activities, the County shall obtain any necessary permits for impacts to Regional Water Quality Control Board (RWQCB) and CDFW jurisdictional areas. Mitigation for the loss of jurisdictional resources shall be negotiated with the resource agencies during the regulatory permitting process. Potential mitigation options shall include one or more of the following: (1) payment to a mitigation bank or regional riparian enhancement program (e.g., invasive plant or wildlife species removal) and/or (2) restoration of riparian habitat either on site or off site at a ratio of no less than 1:1, determined through consultation with the above-listed resource agencies. If in-lieu mitigation fees are required, prior to the</p>	<p>Less than significant impact.</p>

**TABLE ES-2
SUMMARY OF PROJECT DESIGN FEATURES, REGULATORY REQUIREMENTS,
AND MITIGATION MEASURES**

Potentially Significant Impact	Project Design Features, Regulatory Requirements, and Mitigation Measures	Level of Significance After Mitigation
	<p>initiation of any construction-related activities, the LACFCD shall pay the in-lieu mitigation fee to a mitigation bank/enhancement program for the in-kind (equivalent vegetation type and acreage) replacement of impacted jurisdictional resources. If a Restoration Program is required, prior to the initiation of any construction-related activities, LACFCD shall prepare and submit a Riparian Habitat Mitigation and Monitoring Program (HMMP) for USACE and CDFW approval. If a Riparian HMMP is required, it shall contain the following items:</p> <ul style="list-style-type: none"> A. Responsibilities and qualifications of the personnel to implement and supervise the plan. The responsibilities of the Landowner, Specialists, and Maintenance Personnel that would supervise and implement the plan shall be specified. B. Site selection. The mitigation site shall be determined in coordination with the USACE, CDFW, and RWQCB. The site shall either be located in a dedicated open space area on County land, USFS land, or off-site land shall be purchased. C. Seed source. Seeds (or plantings) used shall be from local sources (within ten miles of the Project area) to ensure genetic integrity. D. Site preparation and planting implementation. Site preparation shall include (1) protection of existing native species; (2) trash and weed removal; (3) native species salvage and reuse (i.e., duff); (4) soil treatments (i.e., imprinting, decompacting); (5) temporary irrigation installation; (6) erosion-control measures (i.e., rice or willow wattles); (7) seed mix application; and (8) container species planting. E. Schedule. A schedule shall be developed which includes planting in late fall and early winter, between October 1 and January 30. F. Maintenance Plan/Guidelines. The Maintenance Plan shall include (1) weed control; (2) herbivory control; (3) trash removal; (4) irrigation system maintenance; (5) maintenance training; and (6) replacement planting. G. Monitoring plan. The Monitoring Plan shall include (1) qualitative monitoring (i.e., photographs and general observations); (2) quantitative monitoring (i.e., randomly placed transects); (3) performance criteria, as approved by the above-listed resource agencies; (4) monthly reports for the first year and reports quarterly thereafter; and (5) annual reports for five years, which shall be submitted to the resource agencies on an annual basis. The site shall be monitored and maintained for five years to ensure successful establishment of riparian habitat within the restored and created areas. 	

**TABLE ES-2
SUMMARY OF PROJECT DESIGN FEATURES, REGULATORY REQUIREMENTS,
AND MITIGATION MEASURES**

Potentially Significant Impact	Project Design Features, Regulatory Requirements, and Mitigation Measures	Level of Significance After Mitigation
	<p>H. Long-term preservation. Long-term preservation of the site shall also be outlined in the conceptual Mitigation Plan to ensure the mitigation site is not impacted by future development.</p>	
<p>Section 4.4 Cultural Resources</p>		
<p>PDF CUL-1</p>	<p>The Project site boundaries, as defined, exclude the two hangars, which have been previously evaluated and appear eligible for listing in the National Register of Historic Places (NRHP). The Contractor's Specifications will require that none of the Polaris Flight Academy Historic District's contributing buildings or structures would be impacted by the Project.</p>	
<p>RR CUL-1</p>	<p>All construction activities will be conducted in accordance with Section 7050.5 of the California Health and Safety Code regarding the potential discovery of human remains. If applicable, the Native American Heritage Commission (NAHC) will be responsible for designating the most likely descendant (MLD), as required by Section 5097.98 of the California Public Resources Code. If the landowner rejects the recommendations of the MLD, the burial location would be determined in compliance with California Public Resources Code, Section 5097.98.</p>	
<p>Project implementation has the potential to disturb any underlying archaeological resources during grading and excavation associated with construction of the Project.</p>	<p>MM CUL-1 Prior to the start of construction activities, a qualified Archaeologist shall be retained by the County to attend the pre-grading meeting with the construction contractor to establish, based on the site plans, appropriate procedures for monitoring earth-moving activities during construction. The Archaeologist shall determine, based on consultation with the County, when monitoring of grading activities is needed. Monitoring should observe disturbance in the uppermost layers of sediment including the younger Quaternary Alluvium (i.e. approximately 5 feet below ground surface or shallower) and if any archaeological resources are discovered, construction activities must cease within 50 feet of the discovery, as appropriate, and they shall be protected from further disturbance until the qualified Archaeologist evaluates them using standard archaeological protocols. The Archaeologist must first determine whether an archaeological resource uncovered during construction is a "Tribal Cultural Resources" pursuant to Section 21074 of the <i>California Public Resources Code</i>, or a "unique archaeological resource" pursuant to Section 21083.2(g) of the <i>California Public Resources Code</i> or a "historical resource" pursuant to Section 15064.5(a) of the State CEQA Guidelines. If the archaeological resource is determined to be a "Tribal Cultural Resource", "unique archaeological resource" or a "historical resource", the Archaeologist shall formulate a Mitigation Plan in consultation with the County of Los Angeles that satisfies the requirements of the above-listed Code Sections. Upon approval of the Mitigation Plan by the Los Angeles County Director of Public Works (DPW), the Project shall be implemented in compliance with the Plan.</p> <p>If the Archaeologist determines that the resource is not a "Tribal Cultural Resource", "unique archaeological resource" or "historical resource," s/he shall record the site and submit the recordation form to the California Historical Resources Information System (CHRIS) at the South Central Coastal Information Center (SCCIC). The Archaeologist shall prepare a report of the results of any study prepared as part of a testing or mitigation plan, following accepted professional practice. The report shall follow guidelines of the</p>	<p>Less than significant impact.</p>

**TABLE ES-2
SUMMARY OF PROJECT DESIGN FEATURES, REGULATORY REQUIREMENTS,
AND MITIGATION MEASURES**

Potentially Significant Impact	Project Design Features, Regulatory Requirements, and Mitigation Measures	Level of Significance After Mitigation
	California Office of Historic Preservation. Copies of the report shall be submitted to the County and to the CHRIS at the SCCIC at the California State University, Fullerton.	
Project implementation has the potential to disturb or destroy paleontological resources beneath the site.	<p>MM CUL-2 Prior to the start of ground-disturbing activities in native soils, a qualified Paleontologist shall be notified and retained when earth-moving activities are anticipated to impact undisturbed deposits in the older Quaternary alluvium on the Project site (i.e. approximately 5 feet below ground surface or deeper). The designated Paleontologist shall be present during the pre-grade meeting to discuss paleontological sensitivity and to assess whether scientifically important fossils have the potential to be encountered. The Paleontologist shall determine, based on consultation with the County, when monitoring of grading activities is needed based on the on-site soils and final grading plans.</p> <p>All paleontological work to assess and/or recover a potential resource at the Project site shall be conducted under the direction of the qualified Paleontologist. If any fossil remains are uncovered during earth-moving activities, all heavy equipment shall be diverted at least 50 feet from the fossil site until the monitor has had an opportunity to examine the remains and determines that earthmoving can resume. The extent of land area that is prohibited from disturbance shall be at the discretion of the Paleontological monitor. Samples of older Quaternary alluvium shall be collected as necessary for processing and shall be examined for very small vertebrate fossils. The Paleontologist shall prepare a report of the results of any findings following accepted professional practice.</p>	Less than significant impact.
Section 4.5 Geology and Soils		
RR GEO-1	The Project will be designed and constructed in accordance with the Los Angeles County's Building Code, which adopts the California Building Code (CBC), which is based on the International Building Code (IBC). New construction, alteration, or rehabilitation shall comply with applicable ordinances set forth by the County and/or by the most recent County building and seismic codes in effect at the time of project design. In accordance with Section 1803.2 of the 2013 CBC, a geotechnical investigation is required that must evaluate soil classification, slope stability, soil strength, position and adequacy of load-bearing soils, the effect of moisture variation on soil-bearing capacity, compressibility, liquefaction, and expansiveness, as necessary, determined by the County Building Official. The geotechnical investigation must be prepared by registered professionals (i.e., California Registered Civil Engineer or Certified Engineering Geologist). Recommendations of the report, as they pertain to structural design and construction recommendations for earthwork, grading, slopes, foundations, pavements, and other necessary geologic and seismic considerations, must be incorporated into the design and construction of the Project.	
4.6 Greenhouse Gas Emissions		
PDF GHG-1	Up to 1 megawatt (MW) of the Project's electricity demands will be offset through the County's existing 2-megawatt (MW) solar energy facility located immediately east of the Project site. The Contractor's Specifications will require that this County-owned renewable energy source will offset the Project's electrical demands throughout construction as well as long-term operations.	

**TABLE ES-2
SUMMARY OF PROJECT DESIGN FEATURES, REGULATORY REQUIREMENTS,
AND MITIGATION MEASURES**

Potentially Significant Impact	Project Design Features, Regulatory Requirements, and Mitigation Measures	Level of Significance After Mitigation
PDF GHG-2	The Contractor's Specifications will require that the Project will provide a combined minimum of 34 video-visiting stations on-site, along with video interview rooms in transitional housing buildings.	
PDF GHG-3	The Project will post Antelope Valley Transit Authority (AVTA) bus and Metrolink schedules, as well as the locations of the nearest Park-and-Ride lots, in areas visible to visitors and in the Staff Services building to encourage the use of public transportation by staff and visitors. AVTA bus and Metrolink schedule information will be updated not less than every six months to ensure that they are accurate.	
PDF GHG-4	The Contractor's Specifications will require that the Project will incorporate (1) a secure storage area for staff to store bicycles into the Project design plans that allow for the individual locking of bicycles and protection from sun and inclement weather, and (2) bicycle rack(s) adjacent to the Visitor Parking Lot that allows for the individual locking of bicycles.	
RR GHG-1	The Project will be designed and constructed in accordance with the Los Angeles County Code (Title 22, Section 22.52.2130), which requires all new buildings that are greater than 10,000 square feet (sf) and less than 25,000 sf in area will be designed and constructed to achieve the equivalency of a Leadership in Energy and Environmental Design (LEED™) certification; buildings of 25,000 sf or greater will achieve the equivalency of a LEED Silver certification. The Project will comply with Title 22 (Section 22.52.2200 et seq., Drought Tolerant Landscaping; and Section 22.52.2100, Green Building).	
RR GHG-2	The Project will be designed and constructed in accordance with the <i>California Code of Regulations</i> , Title 24 Building Energy Efficiency Program, which establishes a minimum level of building energy efficiency and requires energy efficient measures, including ventilation, insulation, and construction and the use of energy-saving appliances, conditioning systems, water heating, and lighting.	
RR GHG-3	The Project will be designed and constructed in accordance with the Los Angeles County Code (Title 31, including but not limited to, Section 301.2.1 Low-rise Residential Buildings, and Section 301.3.1, Nonresidential Buildings greater than or equal to 25,000 square feet.), Section 4.106.5, Landscape Design, and Section 5.106.3, Low Impact Development or the current County code requirements in place at the time of Project design and construction. Title 31 requires project designs and practices that will result in the conservation of water and energy resources, such as measures for building commissioning, clean vehicle parking, and solid waste recycling.	
RR GHG-4	The Project will include an Employee Commute Reduction Plan (ECRP), commonly known as the Rideshare Plan, in accordance with Los Angeles County Code Chapter 5.9, Vehicle Trip Reduction. The ECRP will specify the measures to be implemented at MLWDC to achieve the target average vehicle ridership performance goal for employee vehicles subject to the Ordinance.	
RR GHG-5	The Project will be subject to the findings of the Advisory Board's evaluation of strategies to reduce negative impacts of operating the MLWDC away from the downtown Los Angeles area, including contract transportation for visitors, videoconferencing for attorney consultation, and reviewing national best practices for visiting and family reunification.	

**TABLE ES-2
SUMMARY OF PROJECT DESIGN FEATURES, REGULATORY REQUIREMENTS,
AND MITIGATION MEASURES**

Potentially Significant Impact	Project Design Features, Regulatory Requirements, and Mitigation Measures	Level of Significance After Mitigation
Section 4.7 Hazards and Hazardous Materials		
RR HAZ-1	Any Project-related hazardous materials and hazardous wastes will be transported to and/or from the Project in compliance with any applicable State and federal requirements, including the U.S. Department of Transportation regulations listed in the <i>Code of Federal Regulations</i> (Title 49, Hazardous Materials Transportation Act); California Department of Transportation (Caltrans) standards; and the California Occupational Safety and Health Administration (CalOSHA) standards.	
RR HAZ-2	Any Project-related hazardous waste generation, transportation, treatment, storage, and disposal will be conducted in compliance with the Subtitle C of the Resource Conservation and Recovery Act (RCRA) (<i>Code of Federal Regulations</i> , Title 40, Part 263), including the management of non-hazardous solid wastes and underground tanks storing petroleum and other hazardous substances. The Project will be designed and constructed in accordance with the regulations of the Los Angeles County Fire Department, which serves as the designated CUPA and which implements State and federal regulations for the following programs: (1) Hazardous Waste Generator Program, (2) Hazardous Materials Release Response Plans and Inventory Program, (3) CalARP, (4) AST Program, and (5) UST Program.	
RR HAZ-3	Any Project-related underground storage tank (UST) repairs and/or removals will be conducted in accordance with the California Underground Storage Tank Regulations (Title 23, Chapter 16 of the <i>California Code of Regulations</i>). Any unauthorized release of hazardous materials will require release reporting, initial abatement, and corrective actions that will be completed with oversight from the RWQCB, DTSC, LACFD, SCAQMD and/or other regulatory agencies, as necessary. Any Project-related use of existing USTs will also have to be conducted (i.e., used, maintained and monitored) in accordance with the California Underground Storage Tank Regulations (Title 23, Chapter 16 of the <i>California Code of Regulations</i>).	
RR HAZ-4	Any Project-related demolition activities that have the potential to expose construction workers and/or the public to asbestos-containing materials (ACMs) or lead-based paint (LBP) will be conducted in accordance with applicable regulations, including, but not limited to: <ul style="list-style-type: none"> • Antelope Valley Air Quality Management District's (AVAQMD's) Rule 1403 • California Health and Safety Code (Section 39650 et seq.) • California Code of Regulations (Title 8, Section 1529) • California Occupational Safety and Health Administration (CalOSHA) regulations (California Code of Regulations, Title 8, Section 1529 [Asbestos] and Section 1532.1 [Lead]) 	
RR HAZ-5	Any Project-related new construction, excavations, and/or new utility lines within 10 feet or crossing existing high pressure pipelines, natural gas/petroleum pipelines, electrical lines greater than 60,000 volts, will be designed and constructed in accordance with the <i>California Code of Regulations</i> (Title 8, Section 1541).	
RR HAZ-6	The Project will be designed and constructed in accordance with Part 77 of the Federal Aviation Regulations (FAR), which requires the County to notify the Federal Aviation Administration of proposed construction or alteration within 20,000 feet from the nearest point of the nearest runway of	

**TABLE ES-2
SUMMARY OF PROJECT DESIGN FEATURES, REGULATORY REQUIREMENTS,
AND MITIGATION MEASURES**

Potentially Significant Impact	Project Design Features, Regulatory Requirements, and Mitigation Measures	Level of Significance After Mitigation
<p>an airport where the structure would extend into a slope of a 100:1 and within 5,000 feet of a heliport where the structure would extend into a slope of a 25:1 from the nearest landing and take-off area of the heliport.</p>		
<p>RR HAZ-7 The radio communications tower shall be subject to review by the Los Angeles County Airport Land Use Commission for compliance with the General William J. Fox Airfield Land Use Compatibility Plan.</p>		
<p>Project implementation has the potential to release asbestos-containing materials and expose the construction crew and future occupants.</p>	<p>MM HAZ-1 In the event that building materials are encountered during construction activities that are suspected of being asbestos-containing materials (ACMs), these materials shall be assumed to contain asbestos and shall be handled, removed, transported and/or disposed in accordance with applicable ACM regulations, until such time that they can be sampled and evaluated for asbestos content.</p> <p>Prior to Project occupancy, an Operations and Maintenance (O&M) Plan shall be prepared by a CalOSHA-certified Asbestos Consultant and implemented by building maintenance staff who have undergone at least 16 hours of asbestos O&M training. The O&M Plan shall be subject to review and approval by the County of Los Angeles Director of Public Works and shall require periodic observation, inspection, and documentation by designated staff to ensure that ACMs do not become damaged and do not result in airborne asbestos fiber release. Any required removal of asbestos shall be made under the direction of a CalOSHA Certified Asbestos Consultant.</p>	<p>Less than significant impact.</p>
<p>Project implementation has the potential to expose lead-based paint to the construction crew and future occupants of the Project.</p>	<p>MM HAZ-2 In the event that painted or ceramic surfaces materials are encountered during construction activities that are suspected of containing lead and/or lead-based paint, these materials shall be assumed to contain lead in concentrations exceeding the Los Angeles County Department of Health Services' definition of 0.7 milligrams per square centimeter (mg/cm², or 600 parts per million) and shall be handled, removed, transported and/or disposed in accordance with applicable regulations for lead content, until such time that they can be sampled and evaluated for lead content.</p>	<p>Less than significant impact.</p>

**TABLE ES-2
SUMMARY OF PROJECT DESIGN FEATURES, REGULATORY REQUIREMENTS,
AND MITIGATION MEASURES**

Potentially Significant Impact	Project Design Features, Regulatory Requirements, and Mitigation Measures	Level of Significance After Mitigation
<p>Project implementation has the potential to cause hazards to the Project site due to failed leak detection tests at the off-site UST, which could result in unknown soil and groundwater contamination.</p>	<p>MM HAZ-3 Prior to the use of the off-site fueling station by any Project-related activities, including any construction activities, the underground storage tanks (USTs) at the off-site fueling station shall be tested and repaired as necessary, subject to inspection and approval by the Los Angeles County Fire Department, as the Certified Unified Program Agency (CUPA).</p>	<p>Less than significant impact.</p>
<p>Section 4.8 Hydrology and Water Quality</p>		
<p>PDF HYD-1 The Contractor's Specifications will require that the Project will be designed and constructed in accordance with the following requirements of the Los Angeles County Department of Public Works for the incorporation of source-control, site-design, and treatment-control BMPs to reduce pollutants in the storm water and to reduce runoff rates and volumes to match existing conditions:</p> <ul style="list-style-type: none"> • 2002 Standard Urban Stormwater Mitigation Plan (SUSMP) • 2006 Hydrology Manual • 2009 County's Low Impact Development (LID) Standards Manual • 2010 Green Building Standards Code (California Code of Regulations Title 24, Part 11) • 2012 Best Management Practices Handbook 		
<p>PDF HYD-2 The Contractor's Specifications will require that the Project will be designed and constructed in accordance with the County's Stormwater and Runoff Pollution Control Ordinance (Chapter 12.80 of the Los Angeles County Code), which prohibits illicit discharges; manages runoff into and from its Municipal Separate Storm Sewer Systems (MS4s); and requires BMPs for new development and major redevelopment projects.</p>		
<p>RR HYD-1 The Project will be constructed in accordance with the National Pollutant Discharge Elimination System (NPDES) General Permit for Storm Water Discharges Associated with the Construction and Land Disturbance Activities, Order No 2009-0009-DWQ, NPDES No. CAS000002 (or the latest approved Construction General Permit). Compliance requires filing a Notice of Intent (NOI); a Risk Assessment; a Site Map; a Storm Water Pollution Prevention Plan (SWPPP) and associated Best Management Practices (BMPs); an annual fee; and a signed certification statement.</p>		

**TABLE ES-2
SUMMARY OF PROJECT DESIGN FEATURES, REGULATORY REQUIREMENTS,
AND MITIGATION MEASURES**

Potentially Significant Impact	Project Design Features, Regulatory Requirements, and Mitigation Measures	Level of Significance After Mitigation
	<p>RR HYD-2: The Project will be constructed and operated in accordance with the National Pollutant Discharge Elimination System (NPDES) General Permit for Storm Water Discharges from Small Municipal Separate Storm Sewer Systems (MS4), Order No 2013-0001-DWQ, NPDES No. CAS000004 (or the latest approved MS4 General Permit). Compliance requires controls to reduce pollutants from the MS4 to the maximum extent practicable (MEP). The MEP standard requires Permittees to apply Best Management Practices (BMPs) that are effective in reducing or eliminating the discharge of pollutants to the waters of the U.S., and emphasizes pollutant reduction and source control BMPs to prevent pollutants from entering storm water runoff.</p>	
Section 4.10 Noise		
	<p>PDF NOI-1 The Contractor's Specifications will require that the Project will use construction vehicles and equipment, either fixed or mobile, that will be equipped with properly operating and maintained mufflers (equivalent or better than original factory equipment), which will be periodically inspected to ensure compliance. Equipment maintenance and staging areas will be located at least 450 feet from residences on 60th Street West.</p>	
	<p>RR NOI-1 The Project will be constructed in accordance with Section 12.08.440 of the County Code, which prohibits construction activities that generate noise that could create a disturbance across a residential or commercial property line from occurring between 7:00 PM and 7:00 AM on weekdays, or at any time on Sunday or a federal holiday.</p>	
<p>Project implementation has the potential for construction noise to impact nearby sensitive receptors.</p>	<p>MM NOI-1 The County of Los Angeles Department of Public Works shall include the following requirement in the Contractor's Specifications: Stationary equipment, such as generators and air compressors, shall be located at least 450 feet from the residences on 60th Street West opposite the Project site. If stationary equipment use is required to be closer than 450 feet, the equipment shall include an enclosure or similar noise attenuation if needed to limit the average hourly daytime noise level at the nearest residential property line to 60 A-weighted decibels (dBA) or less. Proof of compliance, such as noise measurements during construction activities, shall be provided to the County of Los Angeles Department of Public Works within one week of the start of use of stationary equipment within 450 feet of a residence.</p>	<p>Less than significant impact.</p>
4.12 Public Services and Recreation		
	<p>PDF PS-1 The Contractor's Specifications will require that the Project will include space to accommodate both indoor and outdoor recreational facilities for inmate use only, including a recreational building for indoor recreation (e.g., game tables and a craft room); a full sized sports court for volleyball and basketball; a soccer field; a running track; and gardening areas, for both vegetable and flower cultivation.</p>	
	<p>PDF PS-2 The Contractor's Specifications will require that the Project will include space to accommodate general education classes, computer training, general and vocational career technical education, career counseling, a learning resource center, a library and computer labs, and culinary classes that will be made available to the female inmate population and provided through on-site classrooms, library facilities, and computer labs.</p>	

**TABLE ES-2
SUMMARY OF PROJECT DESIGN FEATURES, REGULATORY REQUIREMENTS,
AND MITIGATION MEASURES**

Potentially Significant Impact	Project Design Features, Regulatory Requirements, and Mitigation Measures	Level of Significance After Mitigation
PDF PS-3	The Contractor's Specifications will require that the Project will include space to accommodate a Medical Building and Inmate Processing Area that will provide medical screening; mental health screening; a pharmacy; dental care services; radiology; laboratory services; obstetrics and gynecological services; orthopedic and dermatology services; wellness, hygiene, and diseases prevention training; preventative medical care; sick call services; emergent care; annual medical and dental exams; and tele-medicine/tele-psychiatry services.	
RR PS-1	The Project will be designed and constructed in accordance with the County of Los Angeles Fire Code (Los Angeles County Code, Title 32) and the regulations of the Los Angeles County Fire Department, which include standards for building construction that would reduce the creation of fire hazards and facilitate emergency response.	
RR PS-2	The Project will be designed, constructed and operated in accordance with pertinent provisions of Title 15 of the California Code of Regulations (Crime Prevention and Corrections) and other applicable State and federal requirements. Title 15 (specifically Division 1, Chapter 1, Subchapter 4) outlines the minimum standards for local detention facilities, court holding facilities, temporary holding facilities, and law enforcement facilities, including lockups (a locked room or secure enclosure under the control of a peace officer or custodial officer and primarily used for the temporary confinement).	
4.13 Transportation and Traffic		
PDF TRA-1	The Contractor's Specifications will require that the Vehicular access to the Project will be via two existing driveways: one at 60 th Street West south of West Avenue I and one at West Avenue I. The site access driveways will be stop-sign controlled with a stop-sign facing the minor street approach (i.e., at the Project driveway). The Project driveways will have one inbound travel lane and one outbound travel lane. As determined by the County of Los Angeles Department of Public Works improvements to driveways to accommodate ingress/egress, including new curb and gutter improvements, may be required.	
RR TRA-1	The Project's construction activities will be conducted in accordance with the provision of traffic-control devices in compliance with the Manual for Uniform Traffic Control Devices (MUTCD) to ensure traffic safety on public streets, highways, pedestrian walkways, and bikeways.	
RR TRA-2	The Project's construction activities on public rights-of-way will be conducted in accordance with the current Standard Specifications for Public Works Construction (Greenbook) and Additions and Amendments to the Standard Specifications for Public Works Construction (Graybook), including Traffic Control Provisions.	
RR TRA-3	For any off-site traffic or parking-related activities within the City of Lancaster, the Project's construction activities will be conducted in accordance with the City of Lancaster's Traffic Code (Title 10 of the Lancaster Municipal Code), related to vehicle parking on public roads; construction traffic signs and traffic control; and other related regulations.	

**TABLE ES-2
SUMMARY OF PROJECT DESIGN FEATURES, REGULATORY REQUIREMENTS,
AND MITIGATION MEASURES**

Potentially Significant Impact	Project Design Features, Regulatory Requirements, and Mitigation Measures	Level of Significance After Mitigation
Section 4.14 Utilities and Service Systems		
PDF UTL-1	<p>The Contractor's Specifications will require that the Project will include the following on-site utility infrastructure improvements:</p> <ul style="list-style-type: none"> • New on-site fire and domestic/potable water pipelines that connect to all existing and new buildings, and includes new fire hydrants, as required by the County of Los Angeles Fire Department and/or Department of Public Works. • New connections of the existing on-site sewage pipelines to ensure connection to new on-site buildings. • New on-site storm drainage pipelines and facilities that connect with existing storm drain infrastructure that complies with storm water quality and quality control requirements under the County's SUSMP, LID standards, and Green Building Standards Code. 	
PDF UTL-2	<p>The Contractor's Specifications will require that the Project will include a new off-site 12-inch water pipeline extension from the on-site water lines to the existing water main within West Avenue I. The extension will connect from either 60th Avenue West or from the northern boundary of the site near the helipad, to the existing 12-inch LACWWD 40-owned distribution pipeline in West Avenue I. Existing connections to existing groundwater wells and reservoirs located adjacent to 60th Street West will be severed. The Project's disconnection from the existing water distribution system will be conducted in such a manner as to ensure the integrity of the existing wells, pumps, reservoirs, and water lines for continued use by other County-owned facilities currently being served by this water system.</p>	
RR UTL-1	<p>The Project will be designed, constructed and operated in accordance with the County of Los Angeles Sanitation District's (LACSD's) Wastewater Ordinance, all wastewater discharges into LACSD facilities shall be required to comply with the discharge standards set forth to protect the public sewage system.</p>	
RR UTL-2	<p>The Project's water, sewer, storm drain, and other utility infrastructure improvements will be designed, constructed and operated in accordance with the applicable regulations set forth in the Los Angeles County Code, which incorporates by reference the California Building Code, the California Electrical Code, the California Mechanical Code, the California Plumbing Code, the California Fire Code, and the Green Building Standards Code.</p>	
RR UTL-3	<p>The Project will be constructed in accordance with the County's Green Building Standards Code and Construction and Demolition Debris Recycling and Reuse Ordinance, which requires a minimum of 65 percent of the "non-hazardous construction and demolition debris" (by weight or volume) to be recycled or reused unless a lower percentage is approved by the Director of Public Works.</p>	
RR UTL-4	<p>The Project will be designed, constructed and operated in accordance with the County's Departmental Recycling Program Directives to implement waste reduction and recycling measures.</p>	

**TABLE ES-2
SUMMARY OF PROJECT DESIGN FEATURES, REGULATORY REQUIREMENTS,
AND MITIGATION MEASURES**

Potentially Significant Impact	Project Design Features, Regulatory Requirements, and Mitigation Measures	Level of Significance After Mitigation
<p>Project implementation would require imported water supplies. Contractual obligations and payments would be required to ensure that water supply from the State Water Project (through the Antelope Valley-East Kern Water Agency and Los Angeles County Water District No. 40) is available to serve the Project.</p>	<p>MM UTL-1 The County shall enter the New Water Supply Entitlement Acquisition program established by the County Waterworks District No. 40 (LACWWD No. 40) and pay a one-time deposit of \$10,000 per acre-foot of annual water demand from the Project for the acquisition of additional water supplies from Antelope Valley-East Kern Water Agency (AVEK) to serve the Project, pursuant to the August 13, 2013 Memorandum of Understanding between LACWWD No. 40 and AVEK.</p>	<p>Less Than Significant Impact</p>

SECTION 1.0 INTRODUCTION

1.1 PURPOSE OF THE ENVIRONMENTAL IMPACT REPORT

1.1.1 CALIFORNIA ENVIRONMENTAL QUALITY ACT COMPLIANCE

This Environmental Impact Report (EIR) has been prepared to evaluate the potential environmental impacts associated with the proposed Mira Loma Women's Detention Center (MLWDC) Project (referred to in this EIR as the proposed Project or Project), as required under the California Environmental Quality Act (CEQA) of 1970, as amended (*California Public Resources Code*, Section 21000 et seq.) and the State CEQA Guidelines (Title 14, *California Code of Regulations* [CCR], Chapter 3, Sections 15000 et seq.).

Defined actions with the potential for causing a physical change in the environment are considered "Projects" under Section 21065 of CEQA and Section 15378 of the State CEQA Guidelines. All "Projects" are required to go through an environmental review process in accordance with CEQA and the State CEQA Guidelines. As the construction and operation of the Mira Loma Women's Detention Center is a public agency proposal which could lead to environmental impacts, it is considered a "Project" subject to CEQA.

1.1.2 LEAD AGENCY

Section 15051 of the State CEQA Guidelines identifies the Lead Agency as the public entity with the greatest responsibility for carrying out or approving the project as a whole. As the County would approve, construct, and operate the proposed Mira Loma Women's Detention Center, it is serving as the Lead Agency under CEQA and is responsible for complying with CEQA, including the requisite environmental review process for the Project.

The County, as the Lead Agency, has determined that an EIR is required for the Project and has authorized the preparation of this EIR. The County circulated the Initial Study and Notice of Preparation of an EIR (NOP) between September 5, 2014 and October 6, 2014, and hosted a scoping meeting in the community, to inform other public agencies and interested individuals that, as the Lead Agency, the County is preparing an EIR for the Project. The County will be reviewing and considering the determinations of this EIR prior to its decision to approve, modify, or deny the Project and the associated actions necessary to implement the Project.

1.1.3 INTENDED USES OF THE EIR

This EIR is an informational document prepared under the direction of the County of Los Angeles for the following purposes:

- To satisfy the requirements of CEQA (*California Public Resources Code*, Sections 21000–21178) and the State CEQA Guidelines (*California Code of Regulations*, Title 14, Chapter 14, Sections 15000–15387).
- To inform the general public, the local community, and responsible, trustee, and interested public agencies of the scope of the proposed Project and to describe the potential significant environmental effects; measures to mitigate or avoid those effects; and alternatives to the proposed Project.
- To enable the County of Los Angeles to consider environmental consequences when deciding whether to approve, modify or deny the proposed Project.

- To serve as a source document for responsible agencies to issue permits and approvals, as required, for implementation of the proposed Project.

As described in CEQA and the State CEQA Guidelines, Lead Agencies are charged with the duty to avoid or substantially lessen the significant environmental effects of projects within their jurisdiction. Where feasible alternatives or mitigation measures are not available to reduce significant environmental impacts to a less than significant level, impacts are considered significant and unavoidable.

As permitted under the State CEQA Guidelines (Section 15084 (d)(2),(e)), this Draft EIR has been prepared by a consultant under the contract to the County. The EIR has been prepared with direction, review and input from the County staff and subjected to staff's independent review and analysis. The Draft EIR as circulated for public review reflects the independent judgment of the County. If certified by the County, the conclusions reached in the EIR represent the County's independent judgment regarding the Project's potential environmental impacts.

As part of an EIR certification process, written Findings of Fact must be prepared for each significant adverse environmental effect, if any, identified in the Final EIR, as required by Section 15091 of the State CEQA Guidelines. If the County certifies a Final EIR for a project that has significant and unavoidable impacts, the County shall also state, in writing, the specific reasons for approving the project based on the Final EIR and any other information in the public record. In satisfying this duty, the Lead Agency has an obligation to balance a project's significant effects on the environment with its benefits, including economic, social, technological, legal, and other benefits. This "Statement of Overriding Considerations", if applicable, would explain the specific reasons that the benefits of a proposed project make its unavoidable environmental effects acceptable to the County. A Statement of Overriding Considerations is adopted after the Final EIR is certified and before action to approve a proposed project has been taken. Additionally, the County must adopt a Mitigation Monitoring and Reporting Program (MMRP) in order to ensure implementation of mitigation measures that have been identified in the EIR to reduce or avoid any significant adverse effects of the project on the environment during construction and/or implementation.

The County of Los Angeles is required to consider the information in the Final EIR (i.e., Draft EIR, MMRP, Comments, and Responses to Comments), and any other relevant information prior to any decision on whether to approve the proposed Project. The County will prepare the Findings of Fact, and, if necessary, a Statement of Overriding Considerations.

1.1.4 INCORPORATION BY REFERENCE

This EIR references several technical studies, analyses, and reports that have been used in the preparation of this EIR, which are identified at the end of each section under the heading "References". The preparation of this EIR also relied upon information provided in various County of Los Angeles Board of Supervisors Agenda Reports, Summary of Proceedings, and Final Meeting Minutes. These documents provided context and background for the actions taken by the Board of Supervisors related to County jails in general, and the Project in particular.

In accordance with Section 15150(b) of the State CEQA Guidelines, the locations where the public may obtain and review these referenced documents by appointment during normal business hours used in the preparation of the EIR include the County of Los Angeles, Public Information Office at 358 Kenneth Hahn Hall of Administration, 500 W. Temple Street, Los Angeles, California 90012. As stated in Section 15150(f) of the State CEQA Guidelines, incorporation by reference is most appropriate for including long, descriptive, or technical materials that provide general background but do not contribute directly to the analysis of the problem at hand. The summary

listing of Board Agenda Reports, Summary Proceedings, and Final Meeting Minutes referenced below provide an overview of the Board of Supervisor's deliberations and actions taken on the following dates:

2006: March 6, March 21, June 20, July 11, August 1
2007: January 9, June 18, September 11, October 16, November 6, November 27
2008: January 29, February 19, March 4, March 18, April 8
2011: October 11, October 18, October 25, November 1, November 29
2012: January 24, May 6
2013: May 21, July 12, July 16, August 20, October 18, October 22
2014: May 6
2015: January 26, September 1

1.2 **ORGANIZATION OF THE EIR**

This EIR is organized into the following sections:

Executive Summary. A summary of the proposed Mira Loma Women's Detention Center, including its potential environmental impacts, proposed mitigation measures, and alternatives to the Project are provided at the start of the document, in accordance with Section 15123 of the CEQA Guidelines.

Section 1.0: Introduction. This section provides an introduction to the EIR; the organization of the EIR; and the focus of the environmental analysis. It also summarizes the environmental review process for the EIR; the scoping period; and the comments received by the County on the NOP during the scoping process.

Section 2.0: Environmental Setting. This section was prepared in accordance with Section 15125 of the CEQA Guidelines and includes a description of the Project site and the existing environmental setting of the site and the surrounding area. The existing local conditions on the site by environmental issue are described in this section. In addition, a discussion of other development projects proposed in the surrounding area is presented to serve as the basis for the cumulative analysis.

Section 3.0: Project Description. In accordance with Section 15124 of the CEQA Guidelines, this section outlines the County's underlying purpose and objectives for the Mira Loma Women's Detention Center; includes definition of the proposed site improvements and off-site infrastructure improvements; and discusses the operational characteristics of the Project. A discussion of discretionary actions needed to approve the Project and a list of other public agencies expected to use the EIR in their decision making are also included.

Section 4.0: Environmental Analysis. The analyses of the potential environmental impacts on each environmental issue area that may result from the proposed Project are provided in Section 4.0 of this EIR. This section includes the following subsections:

Section 4.1: Aesthetics

Section 4.2: Air Quality

Section 4.3: Biological Resources

Section 4.4: Cultural Resources

Section 4.5: Geology and Soils

Section 4.6: Greenhouse Gas Emissions

Section 4.7: Hazards and Hazardous Materials

Section 4.8: Hydrology and Water Quality

Section 4.9: Land Use and Planning

Section 4.10: Noise

Section 4.11: Population and Housing

Section 4.12: Public Services and Recreation

Section 4.13: Transportation and Traffic

Section 4.14: Utilities and Service Systems

Section 4.15: Energy

More detailed discussion of the environmental analysis contained in each subsection is provided in Section 1.3.3 below.

Section 5.0: Alternatives Analysis: This section presents alternatives to the Project, which include Alternative 1A: No Project/Continuation of Existing Operations; Alternative 1B. No Project/Predictable Actions; Alternative 2: Alternate Location - New Women's Facility at Pitchess Detention Center; Alternative 3: Alternate Location – New Annex at Century Regional Detention Facility; Alternative 4: Reduced Mira Loma Women's Detention Center Capacity - No Expansion; and Alternative 5: Two Separate Women's Facilities (at the Mira Loma Detention Center and at Pitchess Detention Center South). A brief description of each alternative and a comparison of the impacts of each alternative with the Project are provided in this section of the EIR. In accordance with Section 15126.6(e) of the State CEQA Guidelines, this section also identifies the environmentally superior alternative.

Section 6.0: CEQA-Mandated Sections. As required under Sections 15126(d), 15126.2(a) 15126.2(b) and 15126.2(d) of the CEQA Guidelines, the following topics are addressed in this section: significant environmental effects of the Project; significant environmental effects that cannot be avoided if the Project is implemented; and the growth-inducing impacts of the Project.

Section 7.0: Preparers. This section identifies the individuals responsible for preparing the EIR and persons consulted during the preparation of the EIR.

1.3 EIR FOCUS

1.3.1 ISSUES ADDRESSED IN THIS EIR

The Initial Study for the Project determined that most environmental factors, or issue areas, in the CEQA Guidelines Appendix G sample environmental checklist form should be addressed in the EIR, except for Agriculture and Forestry Resources and Mineral Resources. There are no agricultural uses or designated farmlands, forests or timberlands at or near the Project site. Also, no mineral resources are known to exist at the site and no mineral extraction activities have occurred or are occurring on or near the site. Thus, the Project would have no impacts related to these issues, and no further analysis is required in the EIR.

All other environmental issues are addressed in the EIR. These include the following:

- Aesthetics
- Air Quality
- Biological Resources
- Cultural Resources
- Geology and Soils
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Noise
- Population and Housing
- Public Services and Recreation
- Transportation and Traffic
- Utilities and Service Systems
- Energy

In compliance with Section 15064 of the State CEQA Guidelines, the determination of significance for each impact analysis question is based on the application of significance standards. Specifically, the significance standards are used to determine whether the impacts of the Project would be significant and unavoidable; would be less than significant with mitigation; would be less than significant; or would have no impact. Significance standards are either (1) qualitative and are presented through substantiation of the impact determination provided in the "Impact Analysis" for each environmental issue area or (2) quantitative and are derived from regulatory standards or directives from the Lead Agency. Where regulatory standards apply, they are specified within that issue area EIR section.

1.3.2 SCOPING PROCESS

The County has complied with the State CEQA Guidelines by providing opportunities for early responsible and trustee agency participation in the environmental review process as well as opportunity for early public consultation with interested organizations and individuals. Specifically, the Initial Study and/or Notice of Preparation (NOP) providing notice of a scoping meeting were distributed on September 5, 2014, to federal, State, regional, and local government agencies and interested parties to solicit comments and to inform agencies and the public of the proposed Project during a 30-day public review period that extended from September 5 to October 6, 2014. A notice announcing the availability of the Initial Study and NOP was also published in the *Antelope Valley Press* on September 5, 2014, and in the *Country Journal* on September 6, 2014. A notice regarding the Initial Study and the NOP was also posted on the *Antelope Valley Times* website from September 5 to September 11, 2014. Copies of the Initial Study and NOP were also made available at the following libraries:

Quartz Hill Library
42018 North 50th Street West
Quartz Hill, California 93536

Lancaster Library
601 West Lancaster Boulevard
Lancaster, California 93534

The Project was described in the NOP; potential environmental effects associated with Project approval and implementation were identified; and agencies and the public were invited to review and comment on the Initial Study and the NOP, which are provided in Appendix A-1 of this EIR. Comments on the NOP were received from 12 agencies, 159 letters/emails from individuals, and 6 comment cards, which are provided in Appendix A-2. The scoping period comment letters are listed in Table 1-1 below, along with a summary of the issues raised and the EIR section where the issues raised are addressed.

**TABLE 1-1
COMMENTS ON THE NOP**

Commenting Agency/Group (Date of Comment Letter)	Issues Raised	EIR Section that discusses the issues
Diana Zuniga (September 15, 2014)	EIR timeline Contact and phone number	Section 1.4 Section 1.5
Californians United for a Responsible Budget (CURB) and the Los Angeles No More Jails Coalition (September 15, 2014) and Diana Zuniga (September 17, 2014)	Stop all plans Additional public meetings following the Draft EIR Spanish translation Air Quality Hazardous Materials Valley fever Deteriorating Foundation and Moldy Walls Potential lack of water/adjudication	Section 5.0 Section 4.2 Section 4.7 Section 4.2 Section 4.7 Sections 4.8 and 4.14
Diana Zuniga (September 17, 2014)	When to submit comments	Section 1.4
Anonymous (September 18, 2014)	Valley Fever in Los Angeles County (handed in at Scoping Meeting)	Section 4.2
David Schwed (September 19, 2014)	Transport to Los Angeles Basin or local hospitals Well water and City water system Gunfire noise and loudspeakers Visitor parking GHG emissions	Section 4.12 Sections 4.8 and 4.14 Section 4.10 Section 4.13 Section 4.6
Juniper Hills Town Council (September 17, 2014)	Water Supply	Sections 4.8 and 4.14
Sheila Pinkel (September 19, 2014)	No need for additional prison beds Staff and guards moving into Lancaster Additional sewage impact Destruction of family relationships Gasoline pollution Valley fever and inmate exposure Ozone concentrations Water resources No financial gain for the City Project financing and the need for social programs	Section 5.0 Section 4.11 Section 4.14 Section 4.2 Section 4.7 Section 4.2 Sections 4.8 and 4.14
Lily Alan (September 18, 2014)	Valley fever EIR translation into other languages	Section 4.2
Helena Mietka (September 18, 2014)	Valley fever EIR translation into other languages	Section 4.2
Nadine Lafeber (September 18, 2014)	Valley fever EIR translation into other languages	Section 4.2
Dayle DeBry (October 6, 2014)	Historic resources/Preservation of local and national treasures	Section 4.4
Robert Alvis (October 6, 2014)	War Eagle Field historic significance	Section 4.4
AVAQMD (September 8, 2014)	Short-term and long-term air quality impacts	Section 4.2
City of Lancaster (October 3, 2014)	Water supply Population and housing Public services and recreation Land use and planning	Sections 4.8 and 4.14 Section 4.11 Section 4.12 Section 4.9
County Fire Department (September 18, 2014)	Code and ordinance requirements Erosion, watershed, biological resources, fire hazards, cultural resources, oak trees	Section 4.12 Sections 4.3, 4.4, 4.5, and 4.7

**TABLE 1-1
COMMENTS ON THE NOP**

Commenting Agency/Group (Date of Comment Letter)	Issues Raised	EIR Section that discusses the issues
County of Los Angeles Department of Public Health (October 2, 2014)	Department approvals Cross connection and water service Jail inspection Plan check Noise Air quality Valley fever	Section 3.0 Section 4.14 Section 4.12 Section 4.12 Section 4.10 Section 4.2 Section 4.2
Los Angeles Conservancy (October 6, 2014)	Historic significance of Mira Loma Detention Center	Section 4.4
Metro (September 17, 2014)	TIA for roads and transit	Section 4.13
Native American Heritage Commission (September 25, 2014)	Record search Archaeological survey Native American consultation	Section 4.4 Section 4.4 Section 4.4
County Sanitation Districts (October 6, 2014)	Sewer lines and services	Section 4.14
County Sheriff's Department (October 15, 2014)	Police services	Section 4.12
150 Letters from Different Individuals with the Same Comments (September 2014)	Stop all plans Additional public meetings following the Draft EIR Spanish translation Air quality Hazardous materials Valley fever Deteriorating foundation and moldy walls Potential lack of water/adjudication	Section 5.0 Section 4.2 Section 4.7 Section 4.2 Section 4.7 Sections 4.8 and 4.14
Brenda Avadian (September 17, 2014)	Groundwater adjudication Water supplies	Section 4.8 Section 4.14
GHG: greenhouse gases; EIR: Environmental Impact Report; AVAQMD: Antelope Valley Air Quality Management District; Metro: Los Angeles County Metropolitan Transportation Authority; TIA: Traffic Impact Analysis		

A number of issues raised in the comment letters do not directly relate to the environmental impacts of the Project or alternatives to the Project and thus, are not addressed in the EIR.

The County held a Scoping Meeting for the EIR from 6:00 to 8:00 PM on September 18, 2014, at the American Heroes Park Community Room at 701 West Kettering Avenue in Lancaster, California. The Scoping Meeting sign-in sheets and meeting presentation are provided in Appendix A-3. The purpose of the Scoping Meeting was to provide an additional forum for the public and other agencies to provide input on the environmental issues that should be addressed in the EIR.

When considering comments received during the NOP review period from agencies and individuals, the discussions held during the Scoping Meeting, as well as public testimony provided at various County of Los Angeles Board of Supervisors (BOS) meetings held throughout 2014–15, the primary areas of known controversy related to environmental concerns at the time of the issuance of Notice of Availability (NOA) for the Draft EIR include, but are not limited to:

- Opposition to the expansion of any jail facilities in the County and opposition to incarceration in general, in favor of social and diversion programs;
- Decreased accessibility for families/visitors due to distance from urban Los Angeles area;

- Increase in travel miles to the Antelope Valley and associated increase in traffic, impacts to public transportation, and vehicle emissions;
- Increase in population growth, requiring additional public services, schools, and utilities;
- Increase from noise (e.g. construction, alarms, firing range);
- Deteriorated condition of MLDC buildings;
- Impacts to historic resources related to the Polaris Flight Academy and impacts to Native American resources;
- Placement of inmates in the Antelope Valley due to air quality concerns (e.g. particulates and ozone) and potential exposure to Valley Fever spores through fugitive dust;
- Placement of inmates on former Polaris Flight Academy, which operated as a hazardous waste generator; and
- Groundwater overdraft, drought, and increase in demand for groundwater resources in the Antelope Valley.

The specific issues that were contained in comments submitted on the NOP and the issues raised at the Scoping Meeting are discussed in various sections of the EIR, with those related to Project features addressed in Section 3.0 and those related to environmental impacts discussed in Section 4.0 of this EIR.

1.3.3 ENVIRONMENTAL ANALYSIS

To facilitate the analysis of each environmental issue, a standard format was developed to analyze each issue in Section 4.0 of this EIR. The basis of the environmental analysis for each environmental issue is provided at the start of each section to inform the reader of the technical studies prepared for the Project and/or the major references used in the EIR.

Relevant Programs and Regulations

Under each environmental issue, a summary of the existing federal, State, regional, County, and any other local laws, regulations, and ordinances that directly relate to the environmental issue being analyzed is provided. The summary provides background information about ongoing policies and programs that are in place and to set the regulatory setting under which the Project would occur.

Existing Conditions

The environmental conditions (as they relate to each environmental issue) that exist on the Project site and in the surrounding area are discussed to provide the baseline conditions with which environmental changes associated with the Project would be compared and analyzed. In accordance with Section 15125 of the State CEQA Guidelines, both the local and regional settings are discussed as they existed when the NOP was circulated from September 5, 2014, to October 6, 2014.

Thresholds of Significance

Section 15126.2 of the State CEQA Guidelines requires that an EIR “identify and focus on the significant environmental effects of the proposed project”. “Effects” and “impacts” mean the same under CEQA and are used interchangeably in this EIR. A “significant effect” or “significant impact” on the environment is “a substantial, or potentially substantial, adverse change in any of the

physical conditions within the area affected by the project” (State CEQA Guidelines, Section 15382).

In determining whether an impact is “significant”, Section 15064.7 of the State CEQA Guidelines encourages each public agency to develop and publish thresholds of significance to use in determining the significance of an environmental impact. These thresholds may consist of identifiable quantitative, qualitative, or performance-level criteria used to determine non-compliance or compliance. Non-compliance would mean the effect would be significant, and compliance with the thresholds would mean the effect would normally be considered less than significant.

The County of Los Angeles has not adopted thresholds of significance for general use. Therefore, the significance criteria used in the analysis in Section 4.0 of this EIR are derived in part from Appendix G of the State CEQA Guidelines. In addition, County policies and standards, as well as thresholds adopted by other public agencies with jurisdiction over select environmental issues, are used as thresholds of significance. Also, accepted technical and scientific data are used in some instances to determine if an impact would be considered significant. An effort has been made to use generally accepted thresholds upon which significance can be determined. These thresholds are used in analyzing the potential impacts of the Project.

Project Design Features

Project Design Features (PDFs) are specific design elements incorporated into the Project that are included in the Project’s contractor specifications and final plans, which are implemented in accordance with County protocol to prevent the occurrence of, or reduce the significance of, potential environmental effects. Because PDFs have been incorporated into the Project, they do not constitute mitigation measures as defined by the California Environmental Quality Act (CEQA). However, PDFs are identified in the Mitigation Monitoring and Reporting Program (MMRP) for convenience of tracking to ensure compliance monitoring.

Regulatory Requirements

There are local, State, and federal regulations, laws, and ordinances that are required independent of CEQA review but also serve to avoid or reduce potential environmental impacts. In addition, a number of ongoing programs and practices can reduce or avoid environmental impacts. As all public and private projects are required to comply with these regulations, they are not listed as mitigation measures but are identified as Regulatory Requirements (RRs). RRs are identified in the MMRP for convenience of tracking to ensure compliance monitoring.

Environmental Impact Analysis

The analyses of environmental impacts of the proposed Project are presented in this EIR by issue, which includes the direct and indirect, short-term and long-term, cumulative, and any unavoidable impacts from construction and operation of the Project, with consideration for impacts that would occur on site and off site.

The thresholds of significance (discussed above) provide the basis for distinguishing between impacts that are determined to be significant (i.e., the impact exceeds the threshold of significance) and those that are considered to be less than significant. The analysis is structured to address each threshold, while considering the residual impact after implementing the PDFs and after compliance with the RRs.

Where the analysis of a potential effect concludes that the effect is too speculative or subjective for evaluation, that conclusion is noted and the discussion of that effect is ended. Where the analysis determines that a potential effect may (without undue speculation) occur, but is beneficial, that conclusion is noted. Where the analysis indicates that a potential effect is not significant or not adverse with compliance with PDFs and RRs, that conclusion is also noted.

Where the impact analysis determines that a potential effect may (without undue speculation) occur and is found to have a substantial or potentially substantial and adverse impact on existing physical conditions on the site or in the surrounding area and that the impact would remain significant even after compliance with PDFs and RRs, that conclusion is noted. A discussion of the needed mitigation is then provided, along with a summary of the analysis for each threshold.

Cumulative Impacts

While the extent of environmental changes that would occur with the Project may not be significant, the sum of the impacts of the Project and other projects that are proposed, planned, or under construction in the surrounding area may be cumulatively considerable, as defined in Section 15065(a)(3) of the State CEQA Guidelines. Section 2.4 of this EIR contains a discussion of the overall methods used to determine the scope of cumulative projects considered in the cumulative impact analysis. The anticipated environmental changes resulting from the cumulative projects, from the Project on a cumulative level, are addressed under each environmental issue in Section 4.0 of this EIR.

Mitigation Measures

Where a potentially significant adverse environmental effect has been identified and is not reduced to a level considered less than significant through compliance with the PDFs and RRs, mitigation measures (MMs) have been recommended.

Implementation of the MMs under each environmental issue would avoid or reduce potentially significant adverse impacts that would remain after implementation of the PDFs and compliance with the RRs.

Level of Significance after Mitigation

The level of significance of the identified impacts after incorporation of the PDFs, compliance with the RRs, and implementation of the MMs is stated at the end of each environmental issue. Unavoidable significant adverse impacts, if any, are effects that cannot be mitigated or that remain significant even after mitigation.

References

Technical studies, analyses, reports, plans, and other sources that have been used in the preparation of the environmental analysis for each issue area are listed in this section.

1.4 PUBLIC REVIEW OF THE DRAFT EIR

Upon completion, the Draft EIR was distributed to responsible and trustee agencies, other affected agencies, surrounding cities, interested parties, and all parties who requested a copy of the EIR in accordance with CEQA. A notice announcing the availability (NOA) of the Draft EIR was published in the *Antelope Valley Press*, *Acton Aqua Dolce News*, and *Los Angeles Daily News*. An electronic notice was also posted on the *Antelope Valley Times* website.

A hardcopy of the Draft EIR are available for viewing at the following locations:

Draft EIR- Hardcopy Technical Appendices - CD	Draft EIR- Hardcopy Technical Appendices - CD	Draft EIR- Hardcopy Technical Appendices - Hardcopy & CD
Quartz Hill Library 42018 North 50 th Street West Quartz Hill, California 93536	Lancaster Library 601 West Lancaster Boulevard Lancaster, California 93534	Public Information Office 358 Kenneth Hahn Hall of Administration 500 W. Temple Street Los Angeles, California 90012

The Draft EIR is also available for electronic download from the County's ftp site:
<ftp://dpwftp.co.la.ca.us/pub/PMD/MiraLomaWomenFacility>.

Comments on the Draft EIR from public agencies and interested individuals will be accepted during the 64-day public review period extending from Monday, November 9, 2015 through Tuesday, January 12, 2016. The County decided to provide a voluntary extension beyond the mandatory 45-day public review period to account for the holiday season and to provide ample opportunity and time for the public to review the Draft EIR. During the comment period, written comments on the Draft EIR should be sent to the County of Los Angeles Chief Executive Office by mail or email (see contact information below).

1.5 **PROJECT SPONSOR AND CONTACT PERSON**

The Mira Loma Women's Detention Center Project is a County-sponsored endeavor. All inquiries regarding the Project and the EIR should be directed via email to environmental@ceo.lacounty.gov or by mail to:

County of Los Angeles Chief Executive Office
Capital Projects/Debt Management Division
Attn: Mira Loma Women's Detention Center EIR
754 Kenneth Hahn Hall of Administration
500 West Temple Street
Los Angeles, California 90012

A Public Meeting to provide an overview of the Project and the conclusions of the Draft EIR was held for public agencies and interested individuals on Tuesday, December 8, 2015 from 6:00 to 8:00 PM at the James C. Gilley Lancaster National Soccer Center Eastside Activity Center, 43000 30th Street East, Lancaster, CA 93535. This meeting was voluntary and attendance was not required to submit comments on the Draft EIR.

This page intentionally left blank

SECTION 2.0 ENVIRONMENTAL SETTING

2.1 PROJECT LOCATION AND SETTING

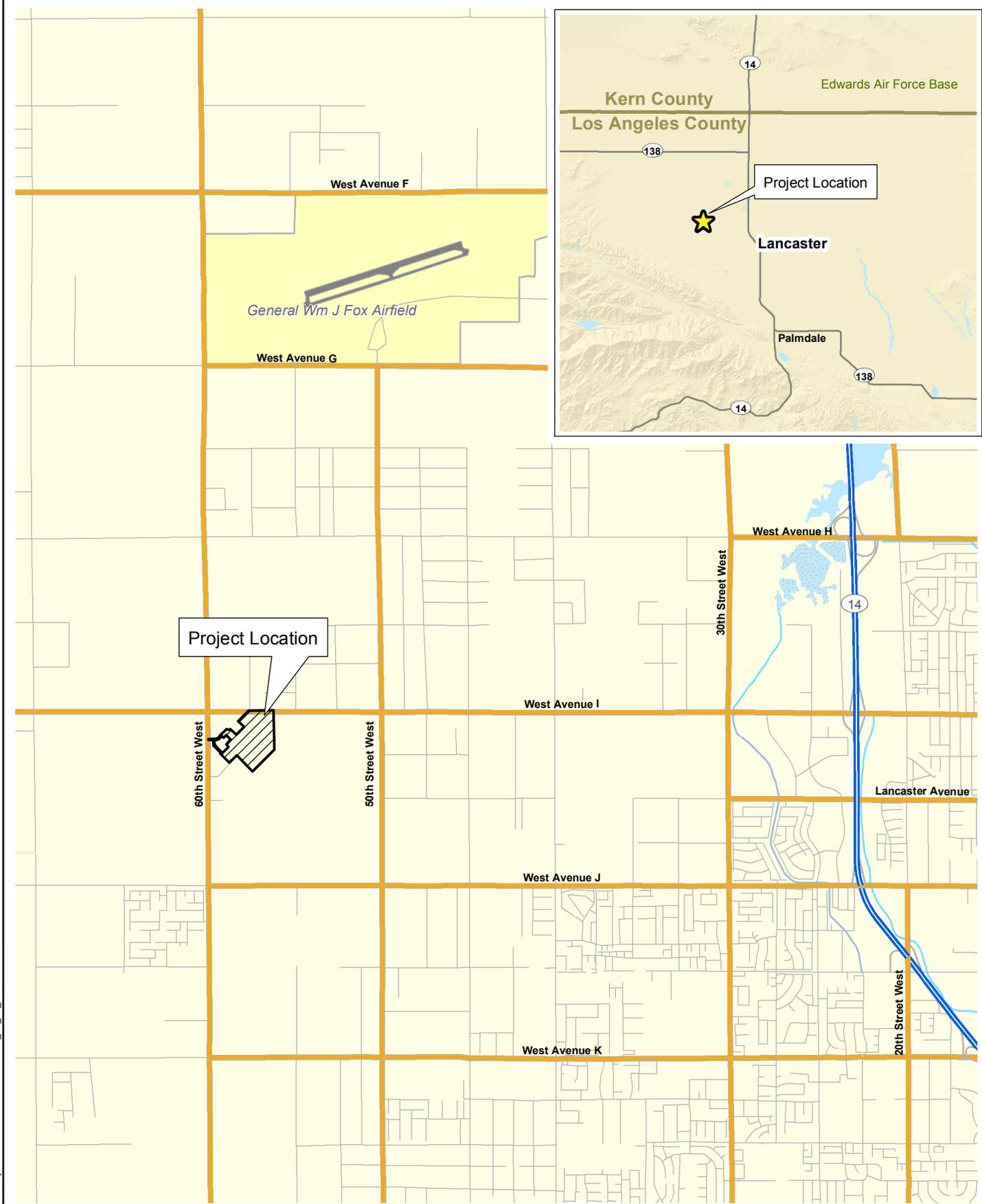
The Mira Loma Women's Detention Center (MLWDC) Project site is located in the City of Lancaster (City) on approximately 46 acres of the former Mira Loma Detention Center (MLDC), which is located on a 355-acre property owned by the County of Los Angeles. The Project site is located in northern Los Angeles County in the Antelope Valley, which is bound by the Tehachapi Mountains to the northwest and the foothills of the San Gabriel Mountains to the southwest. The City of Lancaster is approximately 70 miles north of downtown Los Angeles and immediately north of the City of Palmdale. Exhibit 2-1, Regional Location and Local Vicinity, shows the Project location, Project boundaries, and surrounding areas. The Project site is located at 45100 60th Street West, on the southeast corner of West Avenue I and 60th Street West. The Project would utilize a 46-acre portion of the existing MLDC property and facilities, which are currently not occupied by inmates, nor are they serving any detention functions.

Primary vehicular access to the Project site is from 60th Street West via West Avenue I, which connects to the north-south Antelope Valley Freeway (State Route [SR] 14). SR-14 provides access to the area's major cities of Lancaster, Palmdale, and Santa Clarita, and the greater Los Angeles area to the south via Interstate (I) 5. The Antelope Valley Line of the Metrolink commuter rail system runs generally parallel to the SR-14 and connects the Antelope Valley cities to Santa Clarita, Newhall, Sylmar, Sun Valley, Burbank, Glendale, and downtown Los Angeles. The Lancaster Metrolink Station is located approximately six miles east of the Project site. To the north, SR-14 merges into U.S. Route 395 and connects the Antelope Valley desert communities with the Owens Valley, Mammoth Lakes, Reno, and onward through California and into Oregon.

The Project site and the remainder of the approximate 620-acre "block" of County and State properties—located within the bounds of West Avenue I, 50th Street West, West Avenue J, and 60th Street West—are zoned by the City of Lancaster as "P-Public Use" and are designated as "Public" in the City's General Plan (Lancaster 2009a, 2009b). The entire block includes approximately 355 acres of County-owned property at the northern section and approximately 262 acres of property owned by the State of California for the California State Prison, Los Angeles County at the southern section.

The Project site boundaries and immediately surrounding land uses are depicted in Exhibit 2-2, Aerial Photograph of Land Uses. The approximate 355 acres of County-owned property includes various facilities, including the MLDC; the former High Desert Health System Multi-Ambulatory Care Center (HDHS MACC); a County-operated solar energy facility; the County Probation Department's Challenger Memorial Youth Center (CMYC); and the County Animal Care and Control – Lancaster Shelter. The Bachelor Officer's Quarters (BOQ) is a part of the MLDC and is located on the west side of 60th Street West, across from the main MLDC property. The northern portion of the block, including the Project site, is owned by the County and is not subject to regulation by the Lancaster General Plan or Zoning Ordinance.

The Project site is situated on the western limits of the majority of the commercial and residential development associated with the City of Lancaster.

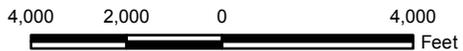


D:\Projects\COLACEO\001\WXD\I\EX_RL_LV_20151023.mxd

Regional Location and Local Vicinity

Exhibit 2-1

Mira Loma Women's Detention Center



 Project Site

County of Los Angeles Animal Care and Control - Lancaster Shelter

West Avenue I

County of Los Angeles Mira Loma Detention Center

Solar Energy Facility

Challenger Memorial Youth Center

Former High Desert Health System (HDHS) Multi-Service Ambulatory Care Center (MACC)

60th Street West

California State Prison, Los Angeles County (CSP-LAC)

50th Street West

West Avenue J

Open Drainage Channel

Open Drainage Channel

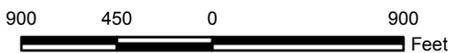
Aerial Source: LAR-IAC 2011

D:\Projects\COLACEO\001\WXD\I\Ex_Aerial_20151023.mxd

Aerial Photograph of Land Uses

Exhibit 2-2

Mira Loma Women's Detention Center



2.2 HISTORICAL CONTEXT

2.2.1 OVERVIEW OF FORMER OPERATIONS

The Project site and larger immediately surrounding area contains numerous buildings and structures, some of which were constructed during World War II as part of a flight training school for British Royal Air Force pilots. The facility was called War Eagle Field, and the school was known as the Polaris Flight Academy until 1944 when the name was changed to the Mira Loma Flight Academy. The Mira Loma Flight Academy closed in 1945 at the end of the war. Two World War II-era airplane hangars from the Flight Academy are located adjacent to the Project site and have been recorded as historic landmarks and were determined to be potentially eligible for the National Register of Historic Places (NRHP) (GPA 2015).

By 1945–1946, the former Flight Academy began to be used as a California Youth Authority facility run by the State Department of Corrections. The California Youth Authority ran a vocational school there, focusing on job training for juvenile offenders until 1953–1954 when Los Angeles County transferred approximately 400 medium-security inmates to the Mira Loma Facility, resulting in the relocation of the state's juvenile prisoners. Approximately 320 acres of the site remained in use as a flight field administered by the State and later by the County.

In 1957, the jail facilities on the County property were expanded. Two new jail barrack buildings (Buildings E and F) were constructed to modernize the facilities and to replace buildings from the original flight school. The MLDC ceased operations for the first time in 1979. It reopened in 1983 and was expanded with the construction of several new buildings in 1986. Many of the buildings within the Project site boundaries were developed in 1986 and later as part of the expansion. The facility was repurposed for female inmates and was known as the Mira Loma Female Honor Ranch, but was closed again 1993. The MLDC reopened for use in 1997 by the U.S. Immigration and Customs Enforcement (ICE) to house illegal immigrants until their immigration cases were decided, and it operated in that capacity until 2012. In the 2000s, modular structures were added to the site, including new guard towers, courtrooms, a medical dispensary, and support offices. The MLDC is currently designed to accommodate 880 inmates, although the MLDC could not currently be occupied without renovations to bring the facility up to the Board of State and Community Corrections (BSCC) and Los Angeles County Sheriff's Department (LASD) standards. In November 2012, the ICE terminated its contract with the County and withdrew from the MLDC. The MLDC facility had a total capacity for 1,400 ICE detainees, but included only 604 detainees at the time of a 2012 compliance inspection conducted by the U.S. Department of Homeland Security, Office of Detention Oversight (USDHS 2012). The facility has not been occupied since November 2012.

In February 2013, Onyx Architects conducted an assessment of existing buildings at the MLDC. As detailed in the Onyx Report, the MLDC functioned as a self-contained community, having the necessary facilities and infrastructure to support most activities. When the facility was operational, inmates would perform the majority of the minor routine site/building maintenance, as well as all cooking and laundry distribution (laundry facilities are off site). The County ISD typically maintained the groundwater wells, infrastructure, and emergency generators (Onyx 2013).

2.2.2 FEMALE COUNTY INMATES

Between 1963 and 1997, women remanded to custody of the LASD were held at the Sybil Brand Institute (SBI), a minimum- to maximum-security facility in the unincorporated community of City Terrace near the intersection of I-10 and I-710. Due to the closure of SBI in 1997, female inmates were moved to the Twin Towers Correctional Facility (TTCF) at 450 Bauchet Street in downtown Los Angeles, which opened in January of 1997 with state-of-the-art maximum security features.

In 2006, female inmates were transferred out of TTCF to the Century Regional Detention Facility (CRDF) at 11705 Alameda Street in the City of Lynwood, with the exception of female inmates who required a higher level of medical/mental health care at the Correctional Treatment Center (CTC). The relocation of female inmates to CRDF provided the space needed to transfer violent, maximum-security male inmates into TTCF. The CRDF opened in 1995 as a direct-supervision, high-level security facility for male inmates and was transformed into an all-female institution in 2006. Upon completion of the Project, appropriately assigned low- to medium-security female inmates would be transferred from CRDF and TTCF to the MLWDC site, and the remaining female inmates would continue to be housed in existing County jail facilities in accordance with their security level and health needs.

2.3 PROJECT SITE CHARACTERISTICS

2.3.1 CURRENT OPERATIONS AND STAFFING

The MLDC has not housed any inmates or served any detention functions since November 2012, when the ICE terminated its contract with the County and withdrew from the site. Current staffing levels are minimal, with LASD staff on site daily for security. For the purposes of establishing a baseline for the impact analyses within this EIR, it is assumed that the MLDC is a vacant facility. Per CEQA Guidelines Section 15125(a), the appropriate baseline condition for the EIR analysis is the time the Notice of Preparation (NOP) is published.

2.3.2 BIOLOGICAL RESOURCES

Vegetation types found in the vicinity of the Project site generally include disturbed, native desert scrub vegetation and agricultural fields. The vegetation on the Project site is dominated by ornamental non-native trees and shrubs and generally occurs in association with the landscaped non-native turf grass lawns scattered throughout the site. Non-native ornamental trees found on site include pine trees and Chinese elm. Shrub species include ficus and oleander.

The Project includes undeveloped portions of the existing site, namely along southeastern perimeter. Although this area is currently undeveloped, it occurs within approximately 100 feet of an existing roadway and consists largely of ruderal weedy species such as Russian thistle (*Salsola tragus*). No native habitat was observed on site. There are no drainages or ephemeral ponds on the Project site. Due to the developed/disturbed nature of the Project site, ongoing maintenance of landscaped areas, and the lack of native habitats, no special status plant species or wildlife species are expected to occur.

2.3.3 ON-SITE STRUCTURES

Not all of the MLDC property is included within the proposed MLWDC Project boundaries. Existing structures on the MLDC property include administrative, programming, barracks, and maintenance buildings associated with the detention center, as well as water storage and well/pumping infrastructure, the County's Internal Services Department (ISD) buildings, and structures associated with the former Polaris Flight Academy. These buildings are shown in Exhibit 2-3, Existing MLDC Facilities. The MLDC is currently not occupied by inmates or serving any detention functions.

As shown on Exhibit 2-3, the MLWDC site includes the majority of the buildings associated with former detention functions at the MLDC. However, some off-site structures would be used by the proposed Project, but are not included within the Project site boundary, such as the BOQ, parking lots, and storage areas. These facilities would not require any physical alterations or otherwise result in environmental impacts.

D:\Projects\COLACEO\001\Graphics\EIR\Ex_Existing_Facilities_20151023.ai



- 1 ADMINISTRATION
- 2 MAIN CONTROL
- 3 INFIRMARY / PROCESSING
- 4 INMATE SERVICES
- 5 WAREHOUSE / LAUNDRY
- 6 UTILITY SHOP (GARDENING)
- 7-15 BARRACKS ("LOW SIDE")
- 16-22 BARRACKS ("HIGH SIDE")
- 23 ADJUSTMENT CENTER (HIGH LOCKDOWN)
- 24 RECREATION ROOM
- 25 ICE ADMINISTRATION
- 26 VISITING RESTROOMS
- 27 IMMIGRATION COURTS
- 28 SCHEDULING / TRAINING
- 29 KITCHEN ARMORY
- 30 STEAM PLANT
- 31 OLD SIDE CANTEN
- 32 E + F SCHOOL (PORTABLES)
- 33 HELIPORT
- 34 VISITOR BOOTH
- 35 MAIN GATE BOOTH
- 36 JAFFEY PARK BOOTH
- 37 NORTH GATE PARK
- 3614-21 OUTSIDE MAINTENANCE + STORAGE
- 3626 A- ABLE BARRACKS
- 3627 D - DOG BARRACKS
- 3628 C - CHARLIE BARRACKS
- 3629 B - BARKER BARRACKS
- 3630 FSB (FACILITIES SERVICE BUILDING)
- 3632 OLD SIDE SCHOOL / ARCHIVE
- 3636 BACKGROUNDS
- 3637 HANGER I
- 3638 TRAINING ROOM
- 3642 WAR EAGLE TOWER (AIRPORT TOWER)
- 3645 G - BARRACKS (HARD LOCK)
- 3646 G - BARRACKS (HARD LOCK)
- 3656 SILVER BULLET (BRITISH 'THEATER')
- 3929 BOQ (BACHELOR OFFICERS QUARTERS)
- 3985 PUMP HOUSE
- 4165 KITCHEN / DINING
- 4268 E - EASY BARRACKS
- 4269 F - FOX BARRACKS
- T1-T4 TOWER (GUARD TOWER NEST)

PROJECT BOUNDARY

HELIPAD ROADWAY

Source: Onyx Architects 2012

Existing MLDC Facilities
Mira Loma Women's Detention Center

Exhibit 2-3



Security fencing surrounds the MLWDC site boundary on the northern side adjacent to West Avenue I; along the eastern/southeastern side adjacent to the perimeter access road and solar facility, along the southwestern side between the barracks and the former HDHS MACC; and along the western side separating the MLDC buildings from the ISD buildings.

The MLDC includes buildings that supported visitor, staff and other support facilities, as well as a secured inner core of facilities for inmates. This core is further subdivided into various secure zones, with access controlled by staff. The buildings intended for inmate use and habitation are for low and medium security inmates, with a discipline building available for lockdown. The MLDC residential facilities are generally set up as dormitories, with bunk beds; common toilet, bathing, and grooming facilities; and security/observation rooms. Most buildings are typically constructed with stem walls (i.e., supporting structures that join the vertical walls to the foundation) or a concrete slab-on-grade. The majority of the buildings have outlasted their useful life expectancy, and require ongoing repairs and maintenance (Onyx 2013). A heliport is located in the northeast corner of the MLDC property and may be used on a daily basis.

Vehicular Access and Circulation

Vehicles can currently enter the MLDC via two driveways on 60th Street West and one driveway on West Avenue I. Parking is provided in surface parking lots just outside the main gate on 60th Street West. Although unoccupied, the facility is still secured, and all visitors must check in at the main gate before entering the secured area. No unauthorized vehicles are allowed into the MLDC.

Utilities

Based on the Design Criteria Document by DLR Group (September 2014), a brief discussion of existing utility infrastructures serving the site is provided below.

Wet Utilities

The wet utility infrastructure on the site includes a potable water system (consisting of wells, pumps, tanks, reservoirs and distribution lines); a central plant; sewer distribution lines; and storm drain infrastructure.

The water system serving the site consists of 2 groundwater wells, pumps, a 400,000-gallon concrete reservoir, and a 100,000-gallon elevated steel tank along 60th Street West; scattered fire hydrants; and water lines to individual buildings on the MLDC site (VCA Engineers 2014), and extending to the BOQ, former HDHS MACC, and County Animal Shelter (Stetson 2012). The extracted groundwater is tested and treated with chlorine daily and tested twice a week by the County of Los Angeles (Converse 2014). There is an emergency interconnection with a transmission main line on 60th Street West that is owned by the Los Angeles County Waterworks District No. 40 (DLR Group 2014).

The sewer system serving the site includes sewer lines and laterals to bathrooms, restrooms, and showers at individual buildings at the MLDC and to the BOQ. These lines connect to a 12-inch line in West Avenue I. A ten-inch sewer line runs through the southeastern section of the site, which accepts wastewater from the on-site kitchen and the adjacent former HDHS MACC, and also connects to the line on West Avenue I (DLR Group 2014). The sewer line on West Avenue I conveys wastewater easterly and northerly to the sewer trunk line of the Los Angeles County Sanitation District No. 14 for treatment at the Lancaster Water Reclamation Plant (LACSD 2014).

Valley gutters and other drainage devices are scattered across the site, but there is no evidence of an underground storm drainage system. Storm drainage on the site is through sheet flow generally towards the northeast into an earthen channel on the south side of West Avenue I (DLR

Group 2014). Storm water flows easterly in this channel and then northerly toward Rosamond Lake, although flows generally percolate into the ground or evaporate prior to reaching the lake (Lancaster 2009b).

A Central Utility Plant (i.e. water cooled chiller and steam plant) is located at the northern end of the site between a hangar and the facilities service building. It provided chilled water, steam and condensate distribution for some buildings on the site and the former HDHS MACC through underground pipes and utility tunnels with at-grade steam-venting structures at scattered locations (VCA Engineers 2014). The Central Utility Plant is being decommissioned and is no longer functional.

Dry Utilities

The dry utility infrastructure on the site includes electrical, gas, and telecommunication distribution systems consisting of overhead and underground lines. Electricity comes from the Southern California Edison (SCE) lines on West Avenue I and 60th Street West and up to 1 megawatt (MW) of energy comes from the adjacent County-owned solar array. There is a substation at the northeastern section of the site (northeast of the kitchen and northwest of the heliport) and four unit substations at scattered locations. An emergency generator is also present at one unit substation, with an underground fuel tank near the generator.

A gas meter at the northern end of the site taps an existing gas line on West Avenue I and is connected to underground lines that run throughout the site. There is a main telecommunications room at the center of the site that connects overhead and underground lines to various buildings and the guard towers.

2.4 SURROUNDING LAND USES

Exhibit 2-2 shows surrounding development; a brief description of the land uses immediately surrounding the Project site is presented below.

2.4.1 LAND USES TO THE NORTH

The area located immediately to the north and northwest of the Project site includes ancillary facilities that are technically part of the MLDC, but are outside of the primary secured area and outside the Project site boundary. Many of the buildings found in this area are associated with the military airfield uses that previously operated as part of the Polaris Flight Academy, including the Silver Bullet theater; A, B, C and D barracks; historic airplane hangars; old side canteen and school. The uses of these various buildings have changed over the years, but all of them are currently vacant or used for storage. This area has a Lancaster General Plan designation of Public Use (P) and is zoned as Public (P).

The land north of West Avenue I is largely vacant and undeveloped, with the exception of a few single-family residential homes. This area has a Lancaster General Plan designation of Light Industrial (LI) and Non-Urban Residential (NU) and is zoned as Light Industrial (LI) and Rural Residential – 2.5 (RR-2.5). The nearest sensitive receptors to the north of the Project site include two residential homes approximately 0.20-mile and 0.32-mile from the Project site boundary, located along 57th Street West and 60th Street West, respectively.

A “sensitive receptor” is defined by the South Coast Air Quality Management District as any residence including private homes, condominiums, apartments, and living quarters, schools, preschools, daycare centers, and health facilities such as hospitals or retirement and nursing homes, long term care hospitals, hospices, prisons, and dormitories or similar live-in housing.

Transmission towers and their associated access roads span the open spaces to the north of the Project site, and the William J. Fox Airport is located approximately 2.5 miles to the northeast of the Project site.

2.4.2 LAND USES TO THE EAST

The County's solar energy facility is located immediately to the east of the MLDC and can generate up to approximately two megawatts (MW) of solar energy to serve the adjacent County facilities. Currently, 1 MW of energy is available to the MLDC. The County of Los Angeles Department of Animal Care and Control – Lancaster Shelter is located approximately 0.36 mile east of the Project site and is a municipal animal shelter for the unincorporated areas of the County of Los Angeles; it provides animal adoption services, spaying/neutering, vaccinations, and pet health exams.

The Los Angeles County Probation Department provides detention and rehabilitation programs for delinquent minors. The CMYC is the largest of several camps operated by the Probation Department, with the goal of providing treatment, care, custody, and training for the rehabilitation of delinquent minors as wards of the Juvenile Court. The nearest sensitive receptors to the east of the Project site would be juveniles within the CMYC. The CMYC property boundary is approximately 0.17 mile east of the Project site, and the facility has a capacity of 660 beds (Lancaster 2009a). This area has a Lancaster General Plan designation of Public Use (P) and zoned as Public (P).

Further east across 50th Street West, approximately 0.6 miles from the Project site, is largely vacant and undeveloped, with the exception of a few single-family residential homes along West Avenue I. This area has a Lancaster General Plan designation of LI and Multi-Residential (MR1) and zoned as LI and Medium Density Residential (MDR). The Southern California Edison (SCE) Antelope Substation is located approximately 3.5 miles to the southeast of the Project site.

2.4.3 LAND USES TO THE SOUTH

The former HDHS MACC is located directly southwest of the Project site and was an outpatient medical services facility that provided primary care, urgent care, specialty services, and outpatient surgery services to County residents. In 2010, the County relocated these services to a new HDHS MACC at the intersection of East Avenue I and 5th Street East in Lancaster. As such, medical and health services have been transitioned out of the former HDHS MACC facility. As a result, the former HDHS MACC is largely vacant and includes mostly unoccupied buildings.

The California State Prison, Los Angeles County (CSP-LAC) is owned and operated by the State of California and is located on the southern 262 acres of the 620-acre block. The facility opened in 1993 and provides detention for men who have been convicted of felonies and who have been classified as minimum, high-medium, and maximum custody prisoners. As of September 2014, the facility had approximately 3,571 prisoners (CDCR 2014). The facility has 957 custody staff and 562 support services staff, for a total of 1,519 staff (CDCR 2013). The CSP-LAC is surrounded on the east, south, and west by a County-owned open storm drain channel. Because the former HDHS MACC is not occupied or operational, the nearest sensitive receptors are inmates within housing units of the CSP-LAC located approximately 0.30 mile to the south of the Project site. The State Prison has a Lancaster General Plan designation of Public Use (P) and zoned as Public (P).

The land south of West Avenue J consists of residential subdivision developments at 60th Street West and 52nd Street West, as well as undeveloped vacant land. This area has a Lancaster General Plan designation of Urban Residential (UR) and is zoned as Single-Family Residential –

7000 (R-7,000). The foothills of the Angeles National Forest lie approximately five miles south of the Project site.

2.4.4 LAND USES TO THE WEST

As discussed above, the area located to the west and northwest of the Project site includes ancillary facilities that are technically part of the MLDC, but are outside of the primary secured area and outside the Project site boundary. Many of the buildings found in this area are associated with the military airfield uses that previously operated as part of the Polaris Flight Academy, maintenance warehouses and storage areas, water tanks and pump houses, fueling island, parking lots and roadways, and other structures at the western section of the MLDC.

The western edge of the block, which includes the primary ingress/egress to the Project site, runs along 60th Street West. The land west of 60th Street West is largely vacant and undeveloped, with the exception of a small apartment complex and the Bachelor Officer's Quarters (BOQ) located to the west of the Project site. This area has a Lancaster General Plan designation of LI and MR1 and zoned as LI and MDR. The nearest sensitive receptor is approximately 65 feet from the anticipated construction of the access/entrance to the Project site and approximately 0.15 mile from the proposed operations and buildings internal to the Project site.

2.5 CUMULATIVE PROJECTS

Section 15130 of the California Environmental Quality Act (CEQA) Guidelines states that cumulative impacts shall be discussed in an EIR where identified environmental impacts are potentially "cumulatively considerable", which is defined in Section 15065(a)(3) as occurring when "the incremental effects of an individual project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects".

Section 15130(b)(1) of the State CEQA Guidelines describes two allowable methods to determine the scope of other projects to be considered in the cumulative impact analysis, as follows:

- (1) A list of past, present, and probable future projects producing related or cumulative impacts, including, if necessary, those projects outside the control of the agency; or
- (2) A summary of projections contained in an adopted general plan or related planning document, or in a prior environmental document which has been adopted or certified, which described or evaluated regional or area-wide conditions contributing to the cumulative impact.

This EIR uses the first method for determining cumulative impacts, which considers the impacts of past, present, and probable future projects and includes projects under construction and those recently proposed in the area as part of the cumulative analysis. In consultation with the City of Lancaster, projects that have been proposed or planned near the Project site are listed in Table 2-1 and located in Exhibit 2-4, City of Lancaster Cumulative Projects Locations. These locations could potentially contribute to impacts from the proposed Project, resulting in potentially cumulative impacts.

**TABLE 2-1
CITY OF LANCASTER CUMULATIVE PROJECTS**

Map No.	Project Name/Number Address/Location	Land Use Data		Project Status
		Land Use	Size	
1	TTM 61989 Southwest corner of 67 th St W and Ave L	Single-Family Detached Homes	56 du	Approved
2	TTM 53229 South side of Ave K to Ave L, between 62 nd St W and 70 th St W	Single-Family Detached Homes	1,594 du	Approved
3	TTM 64922 Northwest corner of 60 th St W and Ave K-12	Single-Family Detached Homes	84 du	Approved
4	CUP 06-09/TPM 68750 Northwest corner of 60 th St W and Ave L	Free Standing Discount Superstore	374,753 glsf	Approved
5	TTM 62409 Northeast corner of 65 th St W and Ave K	Single-Family Detached Homes	36 du	Approved
6	TTM 60885 North of Ave J-12, west of 60 th St W	Single-Family Detached Homes	49 du	Approved
7	TTM 61734 East of 62 nd St W and south of Ave J-8	Single-Family Detached Homes	19 du	Approved
8	TTM 62757 Southeast corner of 70 th Street W and Ave J	Single-Family Detached Homes	650 du	Approved
9	TTM 60294 Northeast corner of Ave J and 65 th St W	Single-Family Detached Homes	99 du	Approved
10	TTM 61118 Northwest corner of Ave J and 62 nd St W	Single-Family Detached Homes	33 du	Approved
11	TTM 61038 West side of 60 th St W and north of Ave J	Single-Family Detached Homes	41 du	Approved
12	TTM 61554 Northeast corner of 55 th St W and Ave J-4	Single-Family Detached Homes	20 du	Approved
13	TTM 70761 60 th St W and Ave J-4	Single-Family Detached Homes	47 du	Under Review
14	TTM 61490 Northeast corner of Ave J-8 and 55 th St W	Single-Family Detached Homes	69 du	Approved
15	TTM 67582 Northeast corner of Ave J-8 and 52 nd St W	Single-Family Detached Homes	8 du	Approved
16	TTM 61542 Southside of Ave J-12, east of 56 th St W	Single-Family Detached Homes	22 du	Recorded
17	TTM 61920 Northwest corner of Ave K and 52 nd St W	Single-Family Detached Homes	108 du	Approved
18	TTM 61677 Southeast corner of 60 th St W and Ave K	Single-Family Detached Homes	58 du	Approved
19	TTM 61678 Southeast corner of 57 th St W and Ave K	Single-Family Detached Homes	58 du	Approved
20	TTM 61679 Southeast corner of Ave K and 55 th St W	Single-Family Detached Homes	55 du	Approved

**TABLE 2-1
CITY OF LANCASTER CUMULATIVE PROJECTS**

Map No.	Project Name/Number Address/Location	Land Use Data		Project Status
		Land Use	Size	
21	TTM 53642 Northeast corner of Ave K-8 and 60 th St W	Single-Family Detached Homes	157 du	Approved
22	TTM 61600 Ave L and east of 60 th St W	Single-Family Detached Homes	33 du	Approved
23	TTM 61040 Northwest intersection of 55 th St W and Ave L	Single-Family Detached Homes	58 du	Approved
24	TTM 61041 Northwest corner of Ave L and future 55 th St W	Single-Family Detached Homes	40 du	Approved
25	TTM 67494 Northeast corner of Ave L and 52 nd St W	Single-Family Detached Homes	20 du	Approved
26	CUP 06-08 Southeast corner of Ave L and 60 th Street W	Free Standing Discount Superstore	394,575 glsf	Approved
27	TTM 63215/CUP 05-26 Southwest corner of 42 nd St W and Ave H	Single-Family Detached Homes	115 du	Approved
28	TTM 63283 Northeast corner of 42 nd St W and Ave I	Single-Family Detached Homes	85 du	Approved
29	TTM 63282 Northwest corner of 40 th St W and Ave I	Single-Family Detached Homes	177 du	Approved
30	TTM 70191/CUP 08-04 Northeast corner of 50 th St W and Jackman St	Condominiums	195 du	Under Review
31	SPR 07-19/CUP 07-19/TTM 70238 Northeast corner of 50 th St W and Lancaster Blvd	Condominiums	160 du	Approved
32	TTM 62979 Southwest corner of 45 th St W and Jackman St	Single-Family Detached Homes	88 du	Approved
33	TTM 62916 Northeast corner of 45 th St W and Lancaster Blvd	Single-Family Detached Homes	84 du	Approved
34	TTM 64244 Southeast corner of 42 nd St W and Ave I	Single-Family Detached Homes	36 du	Approved
35	TTM 66666 West of 40 th St W and north of future Jackman St	Single-Family Detached Homes	8 du	Approved
36	TTM 62208 Southeast corner of 41 st St W and Ave I	Single-Family Detached Homes	41 du	Approved
37	TTM 66667 Southwest corner of 40 th St W and Ave I	Single-Family Detached Homes	12 du	Approved
38	TTM 65186 Northeast corner of future 42 nd St W and Ave J	Single-Family Detached Homes	73 du	Approved
39	TTM 62841 Northwest corner of 40 th St W and Newgrove St	Single-Family Detached Homes	60 du	Approved

**TABLE 2-1
CITY OF LANCASTER CUMULATIVE PROJECTS**

Map No.	Project Name/Number Address/Location	Land Use Data		Project Status
		Land Use	Size	
40	TTM 69446 42 nd St W on the north side of Ave J	Single-Family Detached Homes	4 du	Approved
41	TTM 61535 Southeast corner of Ave J and 45 th St W	Single-Family Detached Homes	240 du	Approved
42	TTM 62643 Northwest corner of 45 th St W and Ave J-8	Single-Family Detached Homes	93 du	Approved
43	TTM 62578 West side of 40 th St W and north side of Ave J-12	Single-Family Detached Homes	87 du	Approved
44	TTM 62121 Northwest corner of 40 th St W and Ave K	Single-Family Detached Homes	115 du	Approved
45	TTM 52719 Northeast corner of Ave K and 50 th St W	Single-Family Detached Homes	80 du	Approved
46	TTM 62793 Southeast corner of 40 th St W and Ave H-8	Single-Family Detached Homes	153 du	Approved
47	TTM 61966 Southeast corner of Ave I and 37 th St W	Single-Family Detached Homes	35 du	Approved
48	TTM 62206 Southwest corner of 37 th St W and Ave I	Single-Family Detached Homes	34 du	Approved
49	TTM 65520 Southeast corner of future 37 th St W and Ave I	Single-Family Detached Homes	34 du	Approved
50	TTM 62579 Northeast corner of 40 th St W and Lancaster Blvd	Single-Family Detached Homes	88 du	Approved
51	TTM 62794 Southeast corner of 35 th St W and Jackman St	Single-Family Detached Homes	102 du	Under Review
52	TTM 62120 Southeast corner of 40 th St W and Lancaster Blvd	Single-Family Detached Homes	316 du	Approved
53	TTM 61921 Northeast corner of 40 th St W and Ave J	Single-Family Detached Homes	74 du	Approved
54	TTM 63095 Northwest corner of 36 th St W and Ave J	Single-Family Detached Homes	41 du	Approved
55	TTM 61907 West side of 32 nd St W and north of Ave J	Single-Family Detached Homes	22 du	Approved
56	TTM 60654 South side of Ave J, west of 32 nd St W	Single-Family Detached Homes	8 du	Approved
57	TTM 54382 Southwest corner of 32 nd St W and Ave J	Single-Family Detached Homes	9 du	Approved
58	TTM 61973 North side of Ave J-8, east of 35 th St W	Single-Family Detached Homes	18 du	Approved
59	TTM 61681 Northeast corner of 36 th St W and Ave J-12	Single-Family Detached Homes	59 du	Approved

**TABLE 2-1
CITY OF LANCASTER CUMULATIVE PROJECTS**

Map No.	Project Name/Number Address/Location	Land Use Data		Project Status
		Land Use	Size	
60	TTM 66842 Southeast corner of 40 th St W and Ave J-8	Single-Family Detached Homes	87 du	Under Review
61	TTM 60664 West of Alep St between Ave K and Ave K-4	Single-Family Detached Homes	39 du	Approved
62	TTM 60291 South side of Ave K-4, west of 35 th St W	Single-Family Detached Homes	66 du	Approved
63	CUP 06-02/TPM 69776 Southwest corner of 30 th St W and Ave K	Retail	36,300 glsf	Approved
64	TTM 61555 Northeast and southeast corners of 40 th St W and Ave M	Single-Family Detached Homes	39 du	Approved
65	VTTM 62520 Northeast corner of 37 th St W and Ave M	Single-Family Detached Homes	11 du	Approved
66	TTM 62845 Northwest corner of 32 nd St W and Ave M	Single-Family Detached Homes	63 du	Recorded
67	TTM 62998 Northeast corner of Ave M and 32 nd St W	Single-Family Detached Homes	15 du	Approved
68	TTM 60818 Southwest corner of Ave H and 20 th St W	Single-Family Detached Homes	46 du	Approved
69	CUP 05-11/TPM 64924 South side of Ave I, west of 20 th St W	Retail Hotel Restaurant	8,400 glsf 88 rooms 5,214 gsf	Approved
70	TTM 61493 Northeast corner of Ave J-4 and 22 nd St W	Single-Family Detached Homes	12 du	Approved
71	TTM 63201 West of 20 th St W and north side of Ave J-8	Single-Family Detached Homes	19 du	Approved
72	CUP 04-10/TPM 61937 20 th St W and Avenue J-8	Retail Hotel	122,502 glsf 93 rooms	Under Construction
73	CUP 05-07/CUP 07-10/TTM 62331 Southeast corner of 30 th St W and Ave K	Single-Family Detached Homes	84 du	Approved
74	TTM 54410 West of 23 rd St W, north side of Ave K-8	Single-Family Detached Homes	5 du	Approved
75	TTM 63241 Northeast corner of 25 th St W and Ave M	Single-Family Detached Homes	8 du	Approved
76	TTM 66620 Northwest corner of 23 rd St W and Ave M	Single-Family Detached Homes	9 du	Approved
77	TTM 71563 Northwest corner of Ave J and 60 th St W	Single-Family Detached Homes	68 du	Approved
78	TTM 72565 Southwest corner of 65 th St W and Ave J-8	Single-Family Detached Homes	36 du	Approved

**TABLE 2-1
CITY OF LANCASTER CUMULATIVE PROJECTS**

Map No.	Project Name/Number Address/Location	Land Use Data		Project Status
		Land Use	Size	
79	TTM 72534 Southeast corner of 67 th St W and Ave J-8	Single-Family Detached Homes	78 du	Under Review
80	42121 60 th St West	Church Addition	33,532 gsf	Under Review
81	State Prison Health Care Facility Improvement Project 44750 60 th Street West	Ancillary Health Care Clinic, Administration and Records Buildings	9 emp 20,092 gsf	Under Review

TTM: tentative tract map; du: dwelling unit; CUP: Conditional Use Permit; TPM: tentative parcel map; glsf: gross leasable square feet; SPR: [site plan review]; gsf: gross square feet; emp: employees

Source: LLG 2015.

County of Los Angeles cumulative projects for this Project site include only solar facilities, which have predominantly short-term construction impacts and negligible long-term operational impacts. Nearby proposed solar projects that have the potential to have construction activities that overlap with the construction schedule for the proposed Project are listed in Table 2-2 and located in Exhibit 2-5, County of Los Angeles Cumulative Project Locations.

**TABLE 2-2
COUNTY OF LOS ANGELES CUMULATIVE PROJECTS**

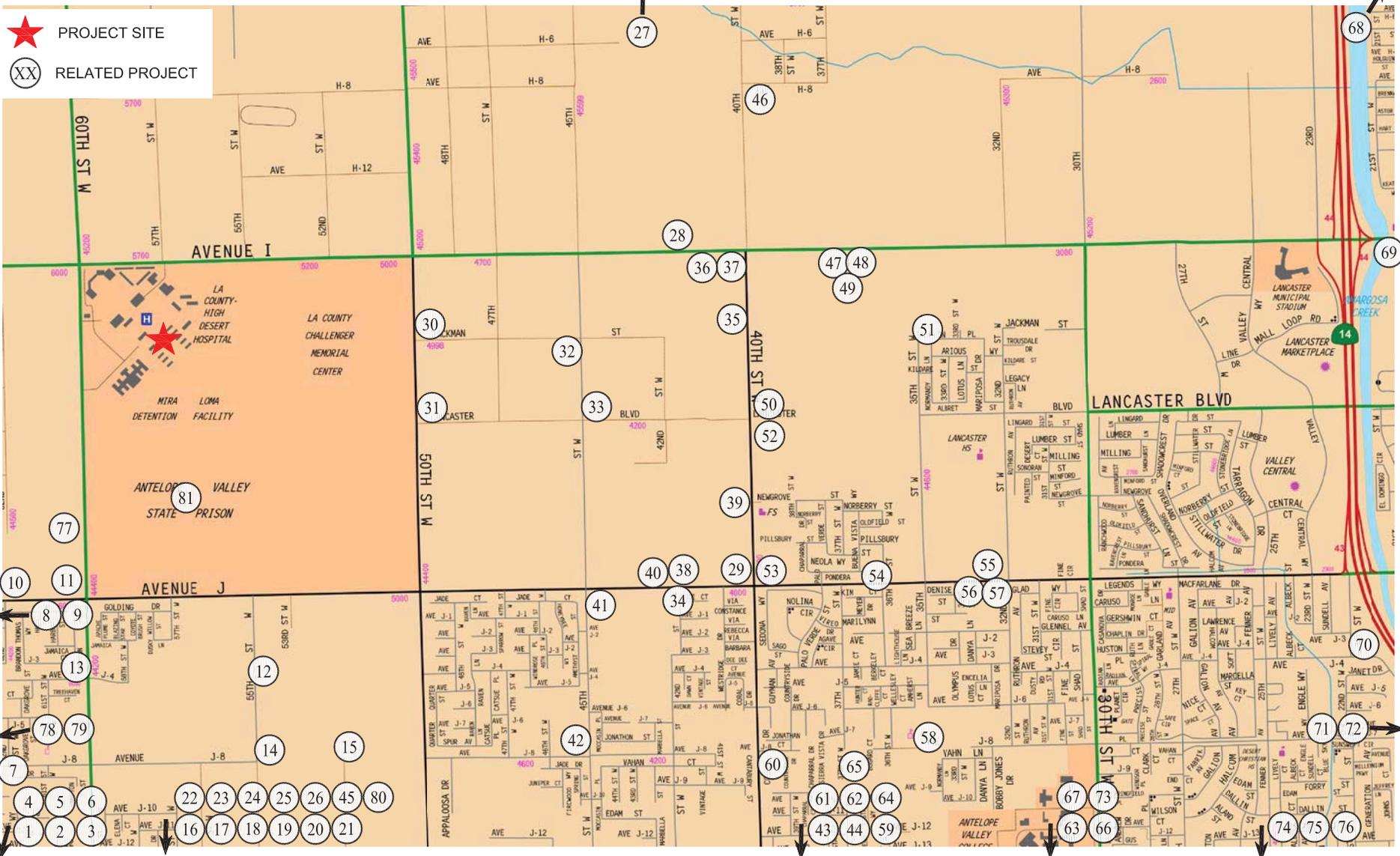
Map No.	Project Name	Address/Location	Size	Project Status
81	Beautiful Earth	187 acres West Ave H between 90 th Street West and 80 th Street West	19 MW	Under construction
82	Canadian Solar	263 acres West Ave J and 110 th Street West	20 MW	Approved
83	Wildflower Green Energy Farm	3708 acres 16700 Lancaster Road/47031 West 167 th Street	300 MW	CEQA Process

Source: CLADRP 2015.

Section 15130(b)(3) of the State CEQA Guidelines states that “lead agencies shall define the geographic scope of the area affected by the cumulative effect and provide a reasonable explanation for the geographic limitation used”. There are environmental issues whose relevant geographic scope for purposes of cumulative impact analysis may be larger or smaller and may be defined by local, regional, or State agency jurisdiction or by environmental factors. One example is the geographic scope of cumulative air quality impacts, which encompasses the Mojave Desert Air Basin. The Basin includes the northeastern portion of Los Angeles County, the eastern portion of Kern County, San Bernardino County, and the eastern portion of Riverside County. This air basin is larger than the City of Lancaster or the Antelope Valley and is noted in the analysis of cumulative air quality impacts.

Conversely, the geographic scope of cumulative aesthetic impacts is limited to anticipated development immediately adjacent to the Project site that share viewsheds or lines of sight with the site. Therefore, consideration of future developments near the Project site (generally west of State Route 14) would provide a more relevant discussion of the cumulative aesthetic impacts of the Project. Where the geographic scope of the cumulative impact analysis under each issue

★ PROJECT SITE
 (XX) RELATED PROJECT



Source: LLG 2015

Cumulative Project Locations

Mira Loma Women's Detention Center

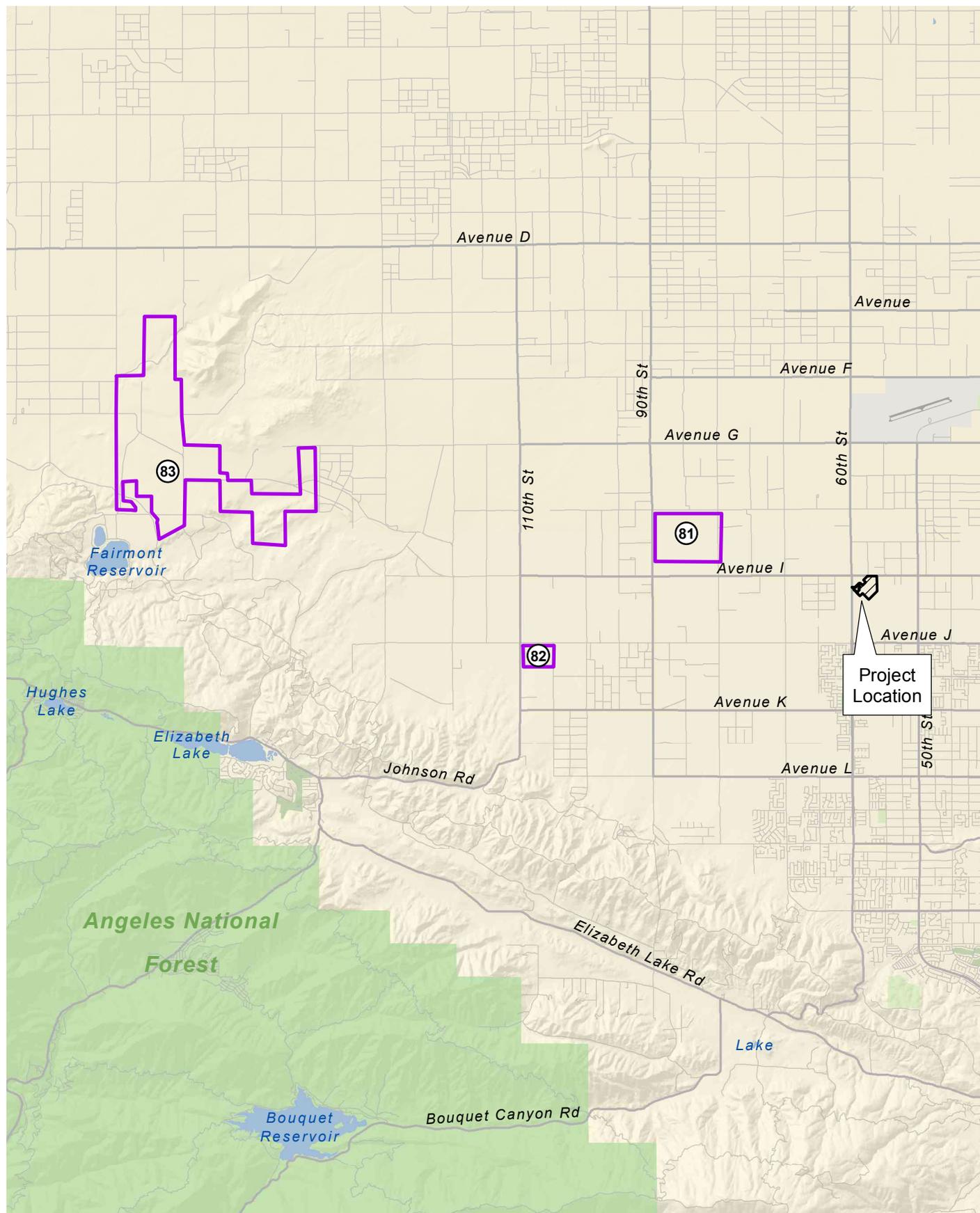


Exhibit 2-4



D:\Projects\COLACEO\J001\Graphics\EIR\Ex_Cumulative_Projects_20151023.ai

D:\Projects\COLACEO\001\WXD\EIR\Ex_Cumulative_Project_Locations_20151023.mxd



County of Los Angeles Cumulative Project Locations

Exhibit 2-5

Mira Loma Women's Detention Center



(Rev: 10-23-2015 LEW) H:\Projects\COLACEO (LAE)\J001\Graphics\EIR\Ex2-5_Cumulative_Project_Locations_20151023.pdf

varies from the City of Lancaster, this is noted at the start of the cumulative impact analysis under each issue.

Each environmental issue in Section 4.0 of this EIR provides a “cumulative impacts” subsection that includes the issue-specific cumulative impact analysis. Section 15130(b)(1) of the State CEQA Guidelines states that the cumulative impact discussion shall reflect the level and severity of the impact and the likelihood of occurrence, but not in as great a level of detail as that necessary for the project alone, and should focus on the cumulative impact to which the identified other projects contribute.

This EIR considers local and regional programs directed at mitigating the cumulative impacts of growth and development, such as those instituted for urban runoff related to water quality impacts. Where there is an issue-specific geographic scope or an applicable regional program, these are discussed within the cumulative impact subsection of each environmental issue addressed in Section 4.0 of this EIR.

2.6 REFERENCES

California Department of Corrections and Rehabilitation (CDCR). 2014 (August 13). *Weekly Report of Population as of Midnight August 13, 2014*. Sacramento, CA: CDCR.

———. 2013. California State Prison, Los Angeles County (LAC). Sacramento, CA: CDCR. http://www.cdcr.ca.gov/Facilities_Locator/LAC-Institution_Stats.html.

Converse Consultants. 2015 (March). *Phase II Environmental Site Assessment Report, Mira Loma Women's Village, 45100 60th Street West, Lancaster, California*. Monrovia, CA: Converse.

———. 2014 (May). *Phase 1 Environmental Site Assessment Report*. Monrovia, CA: Converse.

DLR Group. 2014 (September 30). Design Criteria Document. Santa Monica, CA: DLR Group.

GPA Consulting (GPA). 2015 (April). *Mira Loma Women's Detention Center Historical Resource Report*. El Segundo, CA: GPA.

Lancaster, City of. 2009a (September 17, as revised). Lancaster General Plan Land Use Map. Lancaster, CA: the City. <http://www.cityoflancasterca.org/index.aspx?page=427>.

———. 2009b (July 14). *City of Lancaster General Plan 2030*. Lancaster, CA: the City. <http://www.cityoflancasterca.org/index.aspx?page=427>.

Linscott, Law and Greenspan (LLG). 2015 (April 28). *Traffic Impact Study, Mira Loma Women's Detention Center*. Pasadena, CA: LLG.

Los Angeles, County of, Department of Regional Planning (CLADRP). 2015 (June 9, presentation date). County of Los Angeles Consolidated Correctional Treatment Facilities. Slide presentation to June 9, 2015 Board of Supervisors Los Angeles, CA: CLADRP. http://planning.lacounty.gov/list/category/renewable_energy/

Los Angeles, County of, Sheriff's Department (LASD). 2015 (January 14, date accessed). Case and Hearing Information – Renewable Energy. Los Angeles, CA: CLADRP. http://planning.lacounty.gov/list/category/renewable_energy/

Onyx Architects. 2013 (February 11). *Los Angeles County Detention Facility Assessments: Mira Loma Detention Facility*. Los Angeles, CA: Onyx.

Sanitation Districts of Los Angeles County (LACSD). 2014 (October 6). Personal communication. Letter from A. Raza (Sanitation Districts of Los Angeles County) regarding the Mira Loma Women's Detention Center Project.

Stetson Engineers, Inc. (Stetson). 2012. *Mira Loma Detention Center Distribution System*. Covina, CA: Stetson.

U.S. Department of Homeland Security (USDHS). 2012. Office of Detention Oversight Compliance Inspection, Enforcement and Removal Operations, Los Angeles Field Office, Mira Loma Detention Center, Lancaster, California. Washington, D.C.: USDHS.

VCA Engineers. 2014 (August 13). *Preliminary Site Water Supply and Distribution Analysis Narrative*. Los Angeles, CA: VCA Engineers.

SECTION 3.0 PROJECT DESCRIPTION

3.1 PROJECT BACKGROUND

The County of Los Angeles Chief Executive Office (CEO), the Los Angeles County Sheriff's Department (LASD), and the County of Los Angeles Department of Public Works (DPW) have been evaluating various strategies to reconfigure and/or modernize the County's jail system in order to enhance inmate security, supervision, and safety by providing housing which meets the classification and correctional needs of the inmate population; to stabilize the inmate population; and to ensure compliance with facility and program legal requirements. The evaluation of the County's jail system over the past decade or so has been motivated by inmate overcrowding, the need to update or replace older jail facilities, and the need to satisfy the requirements set forth by the State's 2011 Public Safety Realignment Program (Assembly Bill [AB] 109) and other requirements.

In April 2011, the California Legislature passed AB 109, which established the California Public Safety Realignment Act of 2011 and amended numerous California Codes, including the State Penal Code. AB 109 allowed for non-violent, non-serious, and non-sex sentenced offenders to serve their sentence in county jails rather than state prisons. The State's realignment plans provide a solution for reducing the number of inmates in the state's prison system, as ordered by the U.S. Supreme Court. As such, the LASD is tasked with the mandate to accommodate these inmates that were formerly within the state prison system.

LASD operates seven jail facilities with a California Board of State and Community Corrections (BSCC) rated capacity of 13,688 beds, excluding the 336 beds available in the County's Inmate Reception Center (IRC) and the 80 booking beds available at CRDF, which results in a total of 14,104 total County-wide rated bed capacity. Table 3-1, County Jail Facility Capacity Overview, provides an overview of the County's operational detention centers and jails, including their BSCC rated capacity and average inmate population from in January of 2011 through 2014, as identified in the Vanir Construction Management Inc. (Vanir) Jail Plan Report and by the BSCC (Vanir 2013, BSCC 2013, 2014, 2015). As shown in Table 3-1, the trend in recent years shows an increasing inmate population within the Los Angeles County jail system without a corresponding increase in bed capacity within the jail facilities. As such, the problem of inmate overcrowding within the Los Angeles County jail system is worsening over time.

**TABLE 3-1
COUNTY JAIL FACILITY CAPACITY OVERVIEW**

Facility Name	Inmate Classification	BSCC Rated Capacity Beds	2011 ADP	2011 Percent Over-Capacity	2012 ADP	2012 Percent Over-Capacity	2013 ADP	2013 Percent Over-Capacity	2014 ADP	2014 Percent Over-Capacity
CRDF	Designed for Male Inmates (Housing Female Inmates): High/Med Security	1,588	1,526	-3.9%	1,843	16.1%	2,069	30.3%	2,165	36.3%
MCJ	Designed for Male Inmates: High/Med Security	5,108	4,266	-16.5%	4,407	-13.7%	4,257	-16.7%	4,731	-7.4%
Twin Towers	Designed for Male or Female Inmates: High Security	2,244	2,983	32.9%	3,086	37.5%	3,949	76.0%	4,143	84.6%
PDC (NCCF)	Designed for Male Inmates: Medium Security	2,208	3,905	76.9%	3,751	69.9%	3,768	70.7%	3,952	79.0%
PDC (East)	Designed for Male Inmates: High Security	926	1,591	71.8%	1,696	83.2%	1,476	59.4%	184	-80.1%
PDC (North)	Designed for Male Inmates: Medium Security	768	2	-99.7%	3	-99.6%	1,081	40.8%	1,805	135.0%
PDC (South)	Designed for Male Inmates: Medium Security	846	593	-34.5%	1,009	11.4%	1,431	57.9%	1,499	65.5%
TOTAL		13,688	14,866	8.1%	15,795	14.9%	18,031	31.2%	18,479	34.4%
BSCC: California Board of State and Community Corrections; N/A: not applicable Facility Names CRDF: Century Regional Detention Facility, Lynwood, CA. PDC: Pitchess Detention Center, Santa Clarita, CA. MCJ: Men's Central Jail, Los Angeles, CA. NCCF: North County Correctional Facility, Santa Clarita, CA Source: Vanir 2013, BSCC 2013, 2014, 2015										

3.1.1 JAIL PLAN REPORT AND ASSEMBLY BILL 900

The Public Safety and Offender Rehabilitation Services Act of 2007 (AB 900) provided bond financing for the construction of local jail facilities to address space deficiencies and overcrowding in California's prisons and to improve public safety by reducing the rates at which inmates re-victimize communities and return to jail. The AB 900 funds are available to State prison projects, re-entry facilities, and local jails. In March 2012, the County of Los Angeles was conditionally awarded \$100 million in AB 900 grant pursuant to the California Department of Corrections & Rehabilitation Correction Standards Authority's 2011 Local Jail Construction Financing Program – Phase II, as authorized by AB 900.

The initial conditional award of AB 900 grant funds were initially intended to develop a female detention facility at Pitchess Detention Center (PDC), which required the construction of new inmate housing for 1,156 low- to medium-security female inmates, a 26-bed clinic, and other site improvements. The schedule for developing a female facility at PDC was delayed due to real estate title issues and easements by Southern California Edison and Vintage Oil Corporation over the subject site within PDC. In order to maintain eligibility for the AB 900 grant, the CEO began consideration of alternate sites for the female facility and at the approximate same time, the MLDC became available.

Vanir Construction Management Inc. (Vanir) was commissioned by the County of Los Angeles (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) provided a conceptual evaluation of the needs of the County jail system, including a list of Jail Plan Options for the County of Los Angeles Board of Supervisors (Board) to consider (Vanir 2013). The Jail Plan Report is located in Appendix A-4 of this EIR.

On July 16, 2013, the Board provided direction to various County departments regarding items related to the Jail Plan Report, including direction for the CEO to make a formal inquiry with the BSCC about the conditions upon which the AB 900 funds could be used other than for the PDC facility (County 2013a). On August 20, 2013, the CEO returned to the Board with their proposal letter to the BSCC to pursue construction and operation of the "Women's Village" Project at the Mira Loma Detention Center (MLDC) property, rather than at the PDC. This approach was suggested to be advantageous based on the following considerations, as set forth in the CEO's letter to the BSCC (CEO 2013):

- MLDC, a County-owned facility, became available for re-use due to the vacation of the Immigration and Customs Enforcement (ICE) Bureau through their contract termination in November 2012.
- MLDC had lower cost requirements to accommodate the 1,156 female inmates when compared to the costs at PDC.
- MLDC has existing infrastructure that could be used to expedite delivery of the "Women's Village" Project.
- MLDC has no real estate title issues of concern, whereas the PDC site had easements by Southern California Edison and Vintage Oil Corporation to be resolved.

On October 22, 2013, the Board approved a proposal to use a portion of the MLDC property as the site for the female detention facility in lieu of the PDC site previously proposed by the Board (County 2013b). The AB 900 grant would be used to augment the Project budget for implementation and to increase bed capacity to 1,604 beds for purposes of this proposed Project

Description for the proposed MLWDC Project. In May, 2014, the Board directed that the "Option 1B" be studied, as recommended in the Vanir Report on County jail facilities. Option 1B recommended continued evaluation of renovating the facility at MLDC for a women's detention center.

3.1.2 FEMALE INMATE HOUSING NEED

The LASD is able to manage the inmate population number through policy decisions that allow for demand to be balanced in light of available capacity. As described in the Vanir Jail Plan Report, as of March 2013, the total number of female inmates housed at CRDF was 2,025, of which 91 inmates were high-security, 338 inmates required medical or mental health services, and 1,596 were low- to medium-security and would be eligible to be housed at the MLWDC. As of March 2013, the total number of female inmates housed at Twin Towers Correctional Facility (TTCF) was 38. The Jail Plan Report did not itemize the categorization of inmates at TTCF, but stated that the female population is approximately 1 percent of the total TTCF population (Vanir 2013).

Based on this percentage, the category breakdown of females at TTCF was estimated to include 2 high-security inmates, 21 inmates required medical or mental health services, and 15 low- to medium-security inmates that would be eligible to be housed at the MLWDC. Therefore, based on March 2013 data, approximately 1,611 female inmates would have been eligible for transfer to the MLWDC in 2013.

The Vanir Jail Plan Report determined that, in light of trends analyzed for population, crime rates, arrests, bookings and projections of the AB 109 inmate population as "N3" (i.e. non-violent, non-serious, non-sexual), the Los Angeles County Jail system is projected to remain at or near its current inmate population level (Vanir 2013). Because the LASD inmate population varies from day to day and the total inmate population is also affected by policy decisions, the 1,604 capacity of the proposed MLWDC Project was determined to be adequate and appropriate to serve the eligible female population within the LASD jail system.

In September 2015, the Board reviewed the capacity of the proposals for the building projects in the jail program. The Board confirmed a complementary approach of a funded diversion program, including establishment of a new Office of Diversion and Re-entry, with the continued evaluation of 1,604 inmate beds for eligible female inmates as the proposed Project Description for this EIR.

At the same time, the Board directed the establishment of an Advisory Board that will report back to the Board of Supervisors. The Advisory Board will consist of County staff, outside experts, and others including previously incarcerated participants to review the program model for the MLWDC Project to ensure that it is evidence based in reducing recidivism. As part of its charge, the Advisory Board is tasked with further evaluating strategies to reduce negative impacts of operating the MLWDC away from the downtown Los Angeles area, including contract transportation for visitors, videoconferencing for attorney consultation as well as reviewing national best practices for visiting and family reunification.

3.2 PROJECT GOAL AND OBJECTIVES

3.2.1 PROJECT GOAL

To provide detention facilities for low- to medium-security level female inmates that meet modern correctional standards and that prioritize the on-site integration of gender-responsive female inmate education, treatment, and vocational training. This goal focuses on providing a secure detention facility with cost-effective therapeutic and rehabilitative programs to meet needs of eligible female inmates in order to reduce recidivism.

3.2.2 PROJECT OBJECTIVES

The objectives of the Project are as follows:

- A. To prioritize the on-site integration of gender-responsive female inmate education, treatment, and vocational training to reduce female inmate recidivism.
 - 1. To maximize system-wide efficiencies for County jails by providing a women's facility to permit Gender Responsive Rehabilitation (GRR) model programming for eligible low- to medium-security female inmates.
 - 2. To provide a facility reflective of "real world" living that incorporates abundant natural light, opportunities for social interactions in landscaped open spaces, and defined functional areas to promote release readiness and community reintegration within a secured detention perimeter.
 - 3. To reduce recidivism through programming and development of a women's detention facility at a site with sufficient space to accommodate both campus-style inmate housing and support facilities for education and vocational training, implementing the best practices of Education Based Incarceration (EBI), within a secured detention perimeter.
- B. To provide a detention facility with capacity for eligible low- to medium-security level female inmates.
 - 4. To permit re-allocation of detention facilities designed for higher security levels for male inmates and/or inmates with special security or other needs to serve the appropriate security-level populations.
 - 5. To provide a facility with adequate capacity for a selected subset of the female inmate population based on security level and health status based on system trend analysis from data 2001-2013, which includes the beginning of the "AB 109" population of Low – Level (N3) Offender Population, and later state law changes.
 - 6. To reduce inmate overcrowding according to the BSCC standards for rated capacity, as determined for the qualifying female inmate population.
- C. To maximize the financial resources available to the County's correctional system for construction and operation of jail facilities serving female inmates.
 - 7. To avoid or minimize land acquisition and entitlement costs and to efficiently use existing County-owned physical assets.
 - 8. To avoid or minimize costs and delays to resolve easement and other land title clearances involving other parties' property interests.
 - 9. To avoid new land use conflicts by prioritizing the re-use of currently or formerly operated County-owned property with detention facilities.
 - 10. To control the higher costs of new construction compared to the cost of renovation of existing facilities and the higher costs of maximum security construction compared to medium and low security detention facility construction by renovating and re-purposing existing facilities and infrastructure and/or designing separate low and medium security detention facilities where feasible.

11. To maximize the use of state grant funds from AB 900 and any other grant funds, including the maximization of the number of female inmate beds covered per grant.
12. To minimize the County's net cost to fund a female detention facility, including long-term operation and maintenance costs.

3.3 PROJECT DESCRIPTION

3.3.1 TRANSFER OF INMATES

The MLWDC Project will involve the reuse and expansion of the majority of the currently unoccupied MLDC property to provide a total of 1,604 beds for low- to medium-security female inmates. As a part of the Project, appropriately qualifying female inmates will be transferred from the Century Regional Detention Facility (CRDF) to the MLWDC. The County's remaining female inmate population, who are considered high-risk due to their medical treatment protocol or housing criteria (e.g., their security classification and/or because they require more intensive medical or mental health supervision) will be housed at other jail facilities that have appropriate services to meet their needs. At that time, cells/beds at the CRDF could be used once again for male inmates relocated from Men's Central Jail and/or TTCF in downtown Los Angeles, or the appropriate classifications from other custody facilities in the County's jail system.

Female inmates who will not be eligible for detention at MLWDC include:

- "Special handles" (i.e. inmates in custody who are classified as an "escape risk," "dangerous," "suicidal," "mentally disordered," "high bail," "keep-away from other designated inmates"), which precludes them from living in an open compound;
- Inmates held for serious crimes including, but not limited to, murder, attempted murder, sex crimes against children, abuse of a child, or any other crime as identified by Population Management Bureau (Inmate Classification); and
- Inmates identified as requiring a higher level of medical or mental health care not available at MLWDC.

3.3.2 PROJECT FACILITIES AND FUNCTIONS

The MLWDC Project involves the adaptive reuse, renovation, and expansion of the majority of the buildings at MLDC. Some buildings will be demolished to accommodate the new site plan, which includes new building and facility construction. The majority of the buildings on the Project site will be renovated and/or expanded. Upon Project completion, the MLWDC will accommodate beds for 1,604 female inmates and support facilities for various rehabilitation services. Exhibit 3-1, Proposed Site Plan, shows the preliminary site plan for the Project.

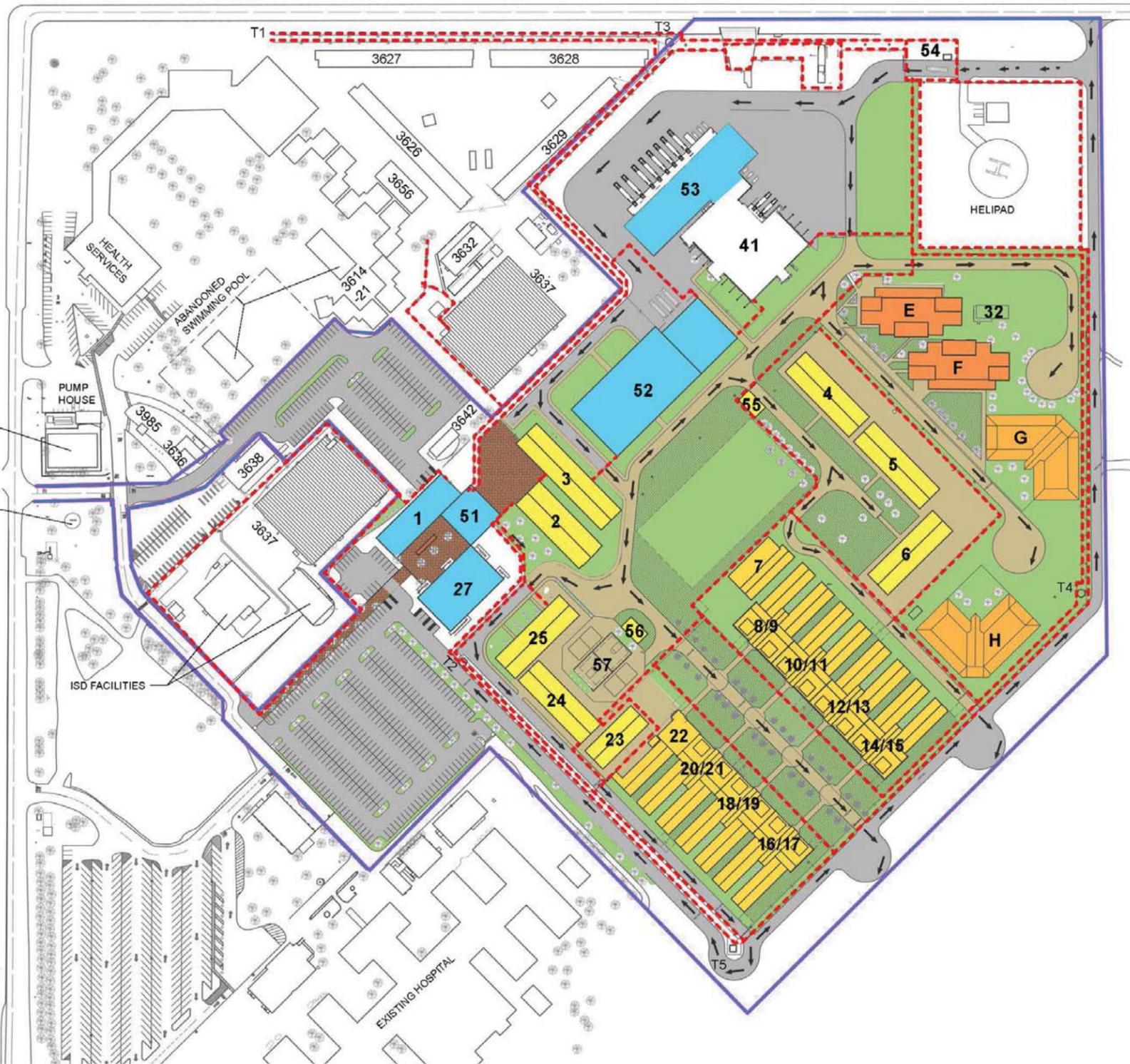
As shown on Exhibit 3-1, the MLWDC will provide detention services within a secured custody setting (e.g., security fencing, guard towers). The Project includes dormitory housing in twinned barracks (896 beds), single barracks (68 beds), new transitional housing (384 beds), and barracks E and F (256 beds), along with facilities for other support services (e.g., administration, visitation, kitchen, inmate processing, laundry, medical, education, recreation, and maintenance). In total, the Project includes approximately 46 acres of property, including 365,210 gross square feet (gsf) of building space within the components shown in Table 3-2 below.

COLOR LEGEND

Support Buildings	Support Buildings
Program Buildings	Program Buildings
Twin Barracks	Twin Barracks
Transitional Housing	Transitional Housing
Barracks	Barracks
Landscaping	Landscaping
Sidewalks / Gravel Fire Lanes	Sidewalks / Gravel Fire Lanes
Plaza/Outdoor Space	Plaza/Outdoor Space
Parking/Roads	Parking/Roads
Project Boundary	Project Boundary
Security Fencing	Security Fencing

BUILDING PROJECT LEGEND

BUILDING	FUNCTION
BLDG. 1	REMODELED ADMINISTRATION
BLDG. 2	VISITING / PROGRAMS STAFFING
BLDG. 3	VISITATION
BLDG. 4	REMODELED CLASSROOMS
BLDG. 5	REMODELED CLASSROOMS
BLDG. 6	REMODELED VOCATIONAL SHOPS
BLDG. 7	SPECIAL NEEDS BARRACKS
BLDG. 8-21	TWINNED BARRACKS
BLDG. 22	ORIENTATION BARRACKS
BLDG. 23	DISCIPLINARY HOUSING
BLDG. 24	INDOOR RECREATION
BLDG. 25	REMODELED PROGRAMS
BLDG. 27	REMODELED STAFF SERVICES
BLDG. 32	EXISTING MODULAR TO REMAIN
BLDG. 41	KITCHEN DINING
BLDG. 51	NEW MAIN CONTROL / ARMORY
BLDG. 52	NEW MEDICAL / IPA
BLDG. 53	NEW WAREHOUSE / MAINT. / LAUNDRY
BLDG. 54	GATE HOUSE
BLDG. 55	INMATE TOILET
BLDG. 56	INMATE TOILET
BLDG. 57	PRE-ENGINEERED COURT COVER
BLDG. E	EXPANDED BARRACKS
BLDG. F	EXPANDED BARRACKS
BLDG. G	TRANSITIONAL HOUSING
BLDG. H	TRANSITIONAL HOUSING



EXISTING BUILDINGS

BUILDING	FUNCTION
3614-21	OUTSIDE MAINTENANCE & STORAGE
3626	A - ABLE BARRACKS
3627	D - DOG BARRACKS
3628	C - CHARLIE BARRACKS
3629	B - BAKER BARRACKS
3632	OLD SIDE SCHOOL / ARCHIVE
3637	HANGAR I
3636	BACKGROUNDS
3638	TRAINING ROOM
3642	WAR EAGLE TOWER (AIRPORT TOWER)
3656	SILVER BULLET (BRITISH THEATER)
3985	PUMP HOUSE

D:\Projects\COLACEO\001\Graphics\EIR\Ex_SitePlan_20151023.ai

Source: DLR Group 2015

Proposed Site Plan

Mira Loma Women's Detention Center



Exhibit 3-1



**TABLE 3-2
PROPOSED FACILITIES AND SIZES**

Area and Function	Rated Capacity (beds)	Function	Gross Floor Area (gsf)
A. Administration and Operations		Public entry, screening, waiting area, restrooms, staff offices, conference room, locker rooms, armory, and main control room	20,594
B. Housing	1,604		168,841
<i>B1. Twinned Barracks</i>	896	<i>Sleeping space, dayroom, showers/toilets, video visiting stations, telephone area, interview rooms, washer/dryer, vending machine, staff office/station</i>	87,325
<i>B2. Individual Barracks</i>	68		6,860
<i>B3. E and F Barracks</i>	256		25,076
<i>B4. Transitional Housing</i>	384	<i>Single story dorm style sleeping space, dayroom, showers/toilets, small cooking appliances and laundry units, video visiting stations, telephone area, interview rooms, multipurpose rooms, vending machine, staff station, agencies workrooms</i>	43,580
<i>B5. Disciplinary Housing</i>	N/A	<i>Holding cells, shower/toilet, staff office, interview room, observation room</i>	4,762
C. Inmate Processing		Staff offices, holding cells, staging cells, search rooms, screening area, transportation services	5,886
D. Central Inmate Services		Visiting booth, family visitation areas, video visitation rooms, privilege contact visitation, security station, staff offices, warehouse, cosmetology lab, educational and vocational centers, culinary arts kitchen, garden and classroom, multipurpose recreation room, community transition programming, football/soccer field. Other services include religious services, counseling services, and community transition services.	53,565
E. Medical Services		Waiting area, holding cells, interview rooms, intake station, multipurpose rooms, clinic, urgent care treatment, pharmacy, medication dispensing, phlebotomy, dental services, offices, conference rooms, mental health workstations, classrooms, interview rooms	20,898
F. Laundry and Food Services		Clothing and bedding storage, sort/fold area, offices, truck bays, kitchen, food storage, coolers, warehouse, cook workstations, food preparation area, dishwashing area, inmate dining area, staff dining area	34,163
G. Central Facility Services		Warehouse, truck dock, offices, maintenance shops (plumbing, electrical, paint, grounds maintenance), showers/toilets, janitor's closets	13,087
H. Communications		Technology support, server room	1,778
		Building Gross Factor of 15%	47,636
		Total Building Gross Area	365,210
gsf: gross square feet Source: DLR Group 2014.			

As shown in Exhibit 3-2, New Construction and Major/Minor Renovation, approximately half of the building space on the Project site will be new construction and approximately half will include

renovation of existing buildings. As shown, some structures will be subject to minor internal remodeling, some buildings will be expanded, while others will be subject to major remodeling or will be new construction. However, final design of the facility will be determined during the design-build contract.

The Project site includes approximately 46 acres, as shown on Exhibit 3-1, Proposed Site Plan. Existing, renovated, and new buildings will include approximately 19 percent of the land within the Project site, outdoor pervious areas (e.g. permeable surfaces such as landscaping or soil) will include approximately 44 percent of the Project site, and other impervious surfaces (e.g. pavement or asphalt) will include approximately 37 percent of the Project site. Within the secured and fenced property, approximately 1.5 acres (63,400 sf) will be designated for outdoor recreational activities and program space that will be accessible to the female inmates (e.g. sports courts and recreation fields, gardens, courtyards-passive recreational areas).

Area A: Administration and Operations

Primary administrative functions will be located in Building 1 (Administration - Correctional Innovative Technical Unit [CITU]), Building 27 (Staff Services), and Building 51 (Central Control and Armory). Staff access to Building 1 will be from the staff courtyard, while public access to MLWDC will be from a new main lobby from the visitors parking lot constructed as part of Building 51. Building 1 will include administrative offices and support services.

Staff beginning or ending their shift will have access to the Building 27, which will include lockers, a break room, a multi-purpose room, and showers. Staff parking is planned directly adjacent the building with private access.

Central control will be housed in Building 51 and will be operational 24 hours a day, 7 days per week. Main control activities will include issuing keys to staff members; observing and controlling the institution's entrance and exit traffic; monitoring Closed Circuit Television (CCTV); monitoring fire and alarm systems; operating central communication systems; operating remotely controlled doors and gates; and monitoring the MLWDC perimeter. Building 51 will house the main sallyport (i.e., secured, controlled entryway), some staff services, the armory, and will be a "bridge" or a covered connection between the administration building and staff services building.

Area B: Housing

Dormitories

There are a total of 18 existing dormitory style housing units (barracks) on the site. They consist of two units constructed in the late 1950s (Barracks E and F) and 16 units constructed in the mid-1980s. Barracks E and F are located near the helipad; these barracks will be renovated to accommodate new day space room additions to house 128 inmates each. The newly constructed portions and/or building extensions on these structures will be compliant with California Building Energy Efficiency Standards (i.e., Title 24 of the California Code of Regulations).

Because there are an odd number of the 1980s barracks on each side of the central court, Buildings 7 and 22 are planned as single 34-bed dormitories; the remaining barracks will be "twinned" as described below. The remaining 14 of the 16 1980s units will be paired or "twinned" together by new day space room additions at the entry of the units. The resultant single building will house 128 inmates in 2 halves with 64 beds each. Buildings 8 and 9, 10 and 11, 12 and 13, 14 and 15, 16 and 17, 18 and 19, and 20 and 21 will be twinned, respectively. The existing barracks will be utilized for sleep areas and the new day space rooms will provide activity space for recreation, video visiting, telephone usage, and other activities. It is anticipated that the day

space room additions and the shaded courtyard between the two twinned units will be used as supplemental program space. To be compliant with the Title 24 Code standards, the resulting planned capacity for existing twinned barracks will be 896 rated beds.

Building 23 will be reserved for disciplinary housing. This building will be renovated to provide short-term disciplinary housing for minor rule infractions. Actions warranting longer assignment to segregation will result in a transfer to downtown Los Angeles to higher security facilities.

Transition Housing (Buildings G and H)

New transition housing will be constructed to accommodate 384 qualifying privileged inmates in a more normative setting prior to re-entry into the community. The 384 beds will be divided into Buildings G and H, which are single-level dormitory style buildings. Common support facilities will be included in each building.

Area C: Inmate Processing

The Inmate Processing Area (IPA) will be contained within Building 52, which will also house medical and mental health services as well as transportation services. The IPA will have bus access within the secure perimeter from the sallyport and service yard located along Avenue I. The IPA and medical services may be collocated to accommodate intake screening and the transport of inmates to outside facilities. All females entering or leaving the facility will be processed through the IPA. Functions include holding and staging inmates for transport to the various County courts and other facilities and transportation to the IRC for release from custody. The unit will be constructed as high-security, and cell fronts will be observable from an officer's station with standard control room capabilities to control access into and out of the unit.

Area D: Central Inmate Services

Visiting Building

Building 3 will provide visiting activities, including (1) non-contact personal and family visits; (2) non-contact attorney visits with provisions for passing and reviewing papers; (3) contact visits with attorneys with appropriate work orders and/or department authorization; and (4) supervised contact visits with immediate family members and children. In addition to these accommodations, the MLWDC will have video visitation opportunities in Building 3 and within some of the housing units. The creation of a public courtyard adjacent the main MLWDC entry will provide visiting access (Building 3) and will accommodate outdoor family visiting sheltered from the view of the main campus.

Education-Based Incarceration Program Buildings

The Project will make use of existing buildings to accommodate various classrooms and activities to serve the inmate population. Female inmates at the CRDF in Lynwood currently receive various programmatic and rehabilitative services, including but not limited to parenting programs; life-skills training; anger management classes; alcohol and drug abuse counseling; and vocational training. These programs will continue at the MLWDC and will be expanded to include Educational Based Incarceration (EBI) programs. General programs include high school classrooms, computer labs, vocational classrooms, career counseling, a learning resource center (library), cooking and baking instruction, a restaurant-setting room, and access to food supplies and a small kitchen. Also, defined gardening areas for both vegetable and flower cultivation will be provided.

Recreational Amenities

Building 24 will be used for indoor recreation and crafts. As depicted on Exhibit 3-3, Recreation and Circulation, the central area of the Project site will contain various recreational amenities, including a covered sports court (e.g., volleyball and basketball), exercise apparatus, and a grassy sports field. These facilities will be surrounded by the proposed buildings and will be completely contained within the security fencing along the perimeter of the Project site. New inmate restroom facilities will be provided adjacent to the sports court and adjacent to the sports field. To accommodate all inmates, outdoor recreation will be provided to each housing zone at least 1 hour per day, 7 days a week.

Area E: Medical Services

Building 52 will contain medical services, including a clinic staffed with licensed medical personnel 24 hours per day, 7 days per week. The medical clinic will have multipurpose exam rooms for routine medical and gynecological examinations; and provide radiological, dental, phlebotomy and urgent care services. Licensed nursing personnel will administer prescription medication; and respond to emergent medical situation. In the event that an inmate's medical conditions warrants a higher level of care, the medical staff will facilitate transportation to area hospitals. Mental health clinicians, social workers, and psychologists and psychiatrists will also be available in Building 52.

Area F: Laundry and Food Services

Building 41 will house the kitchen, dining area/commissary, and storage/support space. The former dining hall will be renovated and refurbished as a new inmate dining hall. The existing staff dining room will be renovated as well. Space will be provided for an on-site commissary program that will be used as a retail trade training program and will additionally include an inmate store. With the exception of the discipline housing, all women will move freely from housing units, work assignments, and other program activity spaces to the inmate dining room. The dining area will be sized to accommodate up to 330 inmates at a single sitting. Staff will be provided a separate indoor and outdoor space for dining.

Laundry will be processed off-site at the Pitchess Detention Center (PDC) Laundry. Bulk clean laundry will be delivered on-site daily and soiled laundry will be collected and processed at PDC. Individual inmate personal items may be washed at each individual barracks in small commercial grade washing machines and dryers, which will be available in each barrack with the exception of the orientation and discipline barracks.

Area G: Central Facility Services

A new Building 53 will provide support services warehousing to serve the anticipated population with adequate docking and delivery space. This building will house program components for food service storage, overall facility service storage, medical storage, and laundry services, and will be equipped with high bay storage for pallet shelving. Building 6 will include utility/maintenance support activities, including the electrical shop, plumbing shop, paint and storage, and grounds maintenance.

Area H: Communications

The Project's communications component involves the development of an information technology (IT) support staff workstation, a climate-controlled server room collocated with the Administration Building, and a telecommunications space in each building.

3.3.3 PROJECT DESIGN FEATURES

Architecture, Design Criteria, and Landscaping

The overall design concept for the Project is to create a non-institutional, campus-style compound to maximize rehabilitative, educational, and vocational opportunities that, in turn, reduce recidivism and associated long-term detention costs. The conceptual architectural and site design reflects a less institutional, more residential style intended to operate as an open campus while providing necessary functionality.

Construction will be of durable, low-maintenance and abuse-resistant finishes, including concrete, solid grouted concrete masonry units, and/or impact-resistant gypsum board for walls; exposed concrete, vinyl composition tile, sheet vinyl, carpet tile, and/or ceramic tile floors; acoustical panel, impact-resistant gypsum board, and/or interlocking metal plank ceilings; and membrane roof systems.

On-site trees will be retained where possible; however, it is anticipated that, due to the soil preparation requirements for site construction, approximately 50 on-site trees will be removed, as well as some landscaped areas. Upon Project completion, portions of the site disturbed by construction activities will be landscaped with low maintenance and low water trees, shrubs, and grasses in accordance with California Department of Corrections design guidelines (to ensure staff and inmate safety) and with County requirements for drought-tolerant plant species and water conservation. Landscaping will be irrigated through an updated irrigation system with smart controllers, hydro-zones, high efficiency nozzles, and automatic shut-off devices. The exact landscaping specimens and planting design will be determined upon final Project design. Of the total outdoor areas proposed on site, approximately 428,000 square feet (sf, i.e., 46.4 percent) will be pervious (e.g. soil or landscaped) and approximately 494,150 sf (53.6 percent) will be paved, including roadways and sidewalks.

Lighting and Security Features

The Project will utilize innovative technologies to provide updated computer programs and state-of-the-art security systems. All security systems will be integrated into a single master control/annunciation panel. All facilities will be constructed in compliance with applicable requirements from the California Building Code (CBC) and the National Fire Protection Code (NFPA). The primary objective of exterior lighting will be to illuminate entrances and to provide adequate site lighting for security and wayfinding. Lighting fixtures will be controlled by a Master Time Clock at Main Control. Exterior lighting will be weatherproof and energy efficient, utilizing pulse start metal halide or light-emitting diode (LED) cut-off type luminaires with lighting levels ranging from 1 to 5 footcandles, depending on the outdoor use.

Interior lighting will be energy efficient and will incorporate maximum daylighting in interior spaces to reduce the hours of artificial lighting. Lighting at indoor spaces will range from 10 to 50 footcandles, depending on the use, with emergency egress and exit lighting at no less than 1 footcandle of illumination at the floor level of emergency paths, offices, and electrical equipment rooms.

Fire alarm smoke detectors will be provided in corridors, dayrooms, electrical closets, telephone closets, and inmate areas. The fire alarm system will monitor the fire sprinkler system and tamper switches. Security sprinkler heads will be provided in critical security areas and in all inmate accessible areas, while standard sprinkler heads will be provided in non-critical security areas.

Fixed cameras will be provided throughout the facility for complete coverage of inmate areas and the perimeter. An Event Recording Computer will be provided to record all critical events monitored or controlled by the Programmable Logic Controllers system. A CCTV Surveillance System will also provide surveillance of inmate housing, discipline and medical housing, dining area, vocational and recreation areas, entries, parking and delivery areas, inmate processing and visiting areas, bus loading and staging areas, and security fence/perimeter of the Project site. Pan-Tilt-Zoom cameras will be added to the exterior of buildings and fences.

As shown in Exhibit 3-1, the Project site will be surrounded by no-climb security fencing, which could include features such as wire mesh panels, angled tops, barbed wire attachments, and/or sensor wiring. Surveillance will be conducted by on-site personnel, and armed personnel will be stationed at entries. Watch towers will remain in place and will be used at the discretion of security staff, except during emergencies. New security fencing will be provided around new structures or major improvement areas.

There will be a centralized control of the locking system throughout the facility including the discipline areas. A card access system for staff will be used. The buildings will also include an intercom paging system and an intercom station equipped with call buttons and speaker/microphones. Duress alarms will be located at key locations and an Uninterruptible Power Supply (UPS) system will include an uninterrupted, filtered power source to all the electronic security systems and backed up by the emergency generator. Emergency generator power will be supplied for 72 hours, with emergency lights in housing areas and the outer fence line.

Parking, Internal Roadways, and Walkways

The Project includes the creation of separate lots for visitors and staff parking. Visitor and staff ingress/egress to the Project site will be from an existing driveway off 60th Street West, with inmate transport and delivery vehicle access off an existing driveway on West Avenue I, near the heliport.

The Staff Parking Lot will be located at the southwestern section of the site, southwest of the administration and recreation buildings. The Visitor Parking Lot will be located in between the existing historic airplane hangars and an Executive Parking Lot will be located north of the Staff Parking Lot. All lots will be accessed either through the entry gate on West Avenue I or from 60th Street. The surface parking areas will provide an adequate amount of parking spaces based on County requirements and will accommodate the demands of anticipated staff and visitor parking needs.

The Project site's internal vehicular and pedestrian circulation system will remain largely the same with some additional pathways to lead to the new buildings, as shown on Exhibit 3-3. Walkways will also be provided throughout the site, which will meet ADA and California Building Code CBC requirements. Fire access routes will be identified within the secured area of the Project site, as well as along the eastern and southeastern edges of the Project site outside of the perimeter fencing, in accordance with requirements of the Los Angeles County Fire Department's requirements.

Utility and Infrastructure Improvements

In order to meet the standards of the BSCC for reuse and long-term occupancy of the MLWDC, a number of infrastructure repairs and upgrades will be required.

Water Infrastructure

The existing water distribution system within the Project site will be modified to create a separate water distribution system to service the MLWDC, including a combined fire water and domestic water loop. This system will be distributed to all buildings and structures requiring water services.

The MLDC property currently contains 2 potable water groundwater wells, a pumping booster station, and 2 above-ground water storage tanks (a 100,000-gallon elevated tank and a 400,000-gallon surface reservoir), which currently provide potable water supplies to MLDC property and other County-owned facilities, including the former HDHS MACC, Lancaster Animal Shelter, and apartments/BOQ on the west side of 60th Street West. The Project will require adequate water supplies and infrastructure to provide water for future on-site operations, including operations and maintenance activities, landscape irrigation, and required fire flows and pressures. In order to ensure a stable and long-term water supply for the Project, the water supply source will change from the current groundwater wells to the County of Los Angeles Water Works District 40 (LACWWD40). This would require an off-site connection to the LACWWD40 12-inch diameter transmission water main located beneath West Avenue I.

The proposed water line extension will be connected to the water main within West Avenue I. Connection to this main line is anticipated through the Project site near the helipad. The water line connection would not require the acquisition of right-of-way. Upon completion of the off-site water line and connection to the LACWWD40 water supplies, the existing water storage facilities, well pumping, and booster pumps that are located within the MLDC property, but outside of the Project site boundaries, will remain as-is, with no improvements or rehabilitation, and continue to provide water to the other County facilities currently served.

Sewer Infrastructure

Domestic sewer lines within the Project site will also require upgrades and new laterals to accommodate the anticipated sewage flows from the expanded and new buildings. A 12-inch diameter vitrified clay pipe public sewer line is located within West Avenue I, which increases in size to a 15-inch and then a 20-inch trunk sewer maintained by the Los Angeles County Sanitation Districts No. 14. A lateral extends from this sewer line into the Project site, which will connect the on-site infrastructure to the off-site Sanitation District's infrastructure to serve the MLWDC Project. No off-site expansions or alterations of the sewer system will be required.

Storm Drain Infrastructure

The storm drainage system on the Project site will need to be upgraded in order to meet current requirements, including compliance with the County's Hydrology Manual January 2006 and Low Impact Development (LID) standards. The Los Angeles Regional Water Quality Control Board (RWQCB) National Pollutant Discharge Elimination System (NPDES) Permit No. CAS004001 (Municipal Separate Storm Sewer System [MS4] Permit) sets forth the requirements for the County to address storm water pollution through the incorporation of Best Management Practices (BMPs) for improved water quality. Although the City of Lancaster is not subject to the County's MS4 Permit (because Lancaster is located within the boundaries of the Lahontan RWQCB), because this is a County project on County-owned property, the Project will be developed in compliance with County regulations.

The Project will construct an on-site storm drainage system that will discharge onto the existing drainage trench located along West Avenue I, as well as into bioswales located along the eastern perimeter of the site. The drainage system will include new catch basins, bio-swales, planter boxes and/or other water treatment infrastructure that will deliver a portion of the surface storm

water runoff to an underground infiltration/retention structure beneath the Project site. Only the peak volume of storm water per the County's Standard Urban Storm Water Mitigation Plan (SUSMP) requirements will be treated for water quality. The treated and stored storm water will eventually percolate into the ground, while any excess flows will discharge from the Project site. It is possible that a new storm drain outlet will be constructed in the drainage area between the Project site and the southern edge of West Avenue I.

Heating, Ventilation, Air Conditioning (HVAC)

The existing Central Utility Plant (i.e. water cooled chiller and steam plant) is located on-site and has previously been taken off-line. The continued decommissioning and eventual removal of the Central Utility Plant is anticipated, thereby allowing development over that portion of the Project site. The kitchen and barracks E and F are the only buildings on the MLWDC site that were fed by the Central Utility Plant. With Project implementation, the kitchen will be fed from a new package air cooled chiller and high efficiency boiler unit placed adjacent to the kitchen. Barracks E&F will no longer require steam. The following types of HVAC systems and equipment may be implemented: (1) Rooftop Packaged Gas Heating Electric Cooling Units. (2) Variable Refrigerant Flow (VRF) systems; and (3) Air Handling Units in the basement of the kitchen to replace the existing equipment that is beyond its useful life (served from the new Package Chiller/Boiler Unit). Barracks will use roof-top package HVAC systems.

Underground tunnels (vent releases) extend from the Central Utility Plant to the barracks. The tunnels will be subject to limited/selective demolition, as needed, if they interfere with new construction and/or trenching. All tunnels will not be impacted, only those that will obstruct site improvements, although the steam distribution system for the Central Utility Plant will be non-functional upon Project implementation.

Electricity

Electricity and telecommunications systems are comprised of both underground and overhead distribution systems throughout the Project site. Power is fed to the Project site from overhead Southern California Edison (SCE) lines along West Avenue I, and there are additional lines running along the 60th Street West. An existing substation is located near the proposed Gate House (Building 54), which connects the overhead SCE lines to on-site underground feeders that connect to three other substations within Project site, and one within the former HDHS MACC property. These facilities, including the substations and underground feeders, will be removed and replaced, as necessary, to accommodate the Project's site plan. No off-site SCE improvements are required.

Communication Systems

Telecommunications System

Cabling, optic fibers, terminations, light interface units, seismic racks, and patch cables and panels will be provided for connections to telephones, security electronics rooms, and computer networks. Telephone equipment and data switches will be provided throughout the facility. Outlets shall be located in office work stations, classrooms, printer, scanner, and copier locations, radio room, main control room, service kiosk, and other locations to provide full wireless coverage inside and outside the buildings.

An Inmate Video Visitation System will be provided that will include a cable television signal distribution system (including conduits, raceways, faceplates, terminations, patch panels and cables, Ethernet switches, and racks) from the main connection to outlets in the proposed

34 video visiting stations in the central inmate area, barracks, and transitional housing. Television sets or computer screens will be provided in each video visiting station.

A Distributed Antenna System (DAS) will be provided for campus-wide radio communication. The DAS will include conduits, cables, antennas, radio equipment, antenna tower, radio repeaters, bi-directional amplifiers, portable hip-mounted radios, base stations, charging stations, radio monitor speakers, and radio consoles. A radio equipment room, approximately 300 square feet in size, will hold all radio equipment, with conduits to indoor and outdoor radio antenna throughout the MLWDC. Radio monitor speakers (desktop or wall-mounted) with volume controls will be located throughout the facility.

Public Address System

The proposed Public Address (PA) systems will be primarily utilized during emergency situations requiring a mass response to a given incident. In order to maintain a more normative environment that focuses heavily on vocational programs in a classroom setting, traditional PA systems and bells to capture the inmate's attention will be counterproductive/disruptive to the ongoing programs. The majority of staff communication within the MLWDC will be conducted via handheld radios, landlines and/or local intercoms.

Radio Communications Tower

A radio communications tower is proposed to be located outside of the flight zone of the existing helipad. The tower will be a self-supporting, three-legged lattice steel tower approximately 180 horizontal "K" bracing or cross bracing for the sides with four antenna-mounting side arms on each face and will tapered at the top. Several microwave antenna/dishes will be mounted on the tower. The tower will have to be designed in accordance with Federal Aviation Administration (FAA) regulations. If FAA obstruction marking is required, the communications tower will be painted in seven bands of equal height in alternating colors of aviation orange and white and will be equipped with the following: (1) one steady-burning red light with one light/lamp fixture on each tower leg, 75 feet above the ground, and (2) two flashing red lights or omni-directional beacons on top. If FAA obstruction marking is not required, the tower will be an unpainted gray color. The communications tower will also be equipped with a climbing ladder down the center and safety-climb and fall-arrest devices and cables for the tower climbers in conformance with Occupational Safety and Health Administration (OSHA) requirements.

Green Building and Sustainability Features

On June 30, 2015, the Board provided direction and guidelines through the Countywide Environmental Sustainability Policy for the development of a County Sustainability Council (CSC) and Sustainability Program Framework. In summary, the CSC's responsibilities are to develop metrics to provide County services in an environmentally sustainable manner, track progress toward accomplishments, facilitate intra-departmental collaboration, acquire funding for sustainability programs, and incorporate environmental justice into sustainability programs. The Framework and its goals and objectives will be developed by the CSC to ensure that the County operates in ways that reduce consumption of energy sources, enhance environmental justice, and protect natural resources (ISD 2015).

The California Buildings Standards Code (CCR Title 24) includes Part 11, known as the California Green Building Standards Code (i.e. CALGreen Code). In November 2013, the County of Los Angeles Board of Supervisors adopted the CALGreen Code by reference as the Los Angeles County Green Building Standards Code (Title 31). The Project will be designed and constructed in compliance with the applicable requirements of the Los Angeles County Green

Building Standards Code (Title 31), is intended to improve public health, safety, and general welfare by enhancing the design and construction of buildings to have a reduced negative impact, or positive environmental impact, and encouraging sustainable construction practices.

Title 31 requires many green building requirements, including the development of a water budget for landscape irrigation use that conforms to the California Department of Water Resources Model Water Efficient Landscape Ordinance. Additionally, Title 31 requires the recycling and/or salvage for reuse a minimum of 65 percent of the non-hazardous construction and demolition debris or meet a local construction and demolition waste management ordinance, whichever is more stringent.

The County's LID Ordinance, as set forth in Chapter 12.84 of Title 12 of the Los Angeles County Code, seeks to minimize erosion and other hydrologic impacts on natural drainage systems by requiring development projects to incorporate properly designed, technically appropriate BMPs, hydromodification controls, and other LID strategies. The Project's storm water runoff rates will mimic the undeveloped condition; pollutants will be prevented from leaving the site; and impacts to natural drainage systems will be minimized.

The County's Drought-Tolerant Landscaping Ordinance establishes minimum standards for the design and installation of landscaping using drought-tolerant plants and native plants that require minimal use of water. These requirements include (1) a minimum of 75 percent of total landscaped area to utilize non-invasive and drought-tolerant plant and tree species appropriate for the climate zone region; (2) a maximum of 25 percent of landscaped areas may be covered with turf grass; (3) all turf grass must be water efficient; and (4) plants must be grouped according to hydrozones in accordance with soil, climate, and light requirements. These regulations are also contained in the Los Angeles County Green Building Standards Code (Title 31).

The County's Green Building Ordinance requires projects to (1) be at least 15 percent more energy efficient than the 2005 California Energy Standards; (2) incorporate smart irrigation control for landscaping and high efficiency indoor toilets; (3) recycle and/or salvage for reuse a minimum of 65 percent of the non-hazardous construction and demolition debris; (4) incorporate drought-tolerant tree plantings; and (5) achieve Green Point Rated (GPR), California Green Builder (CGB), or Leadership in Energy and Environmental Design (LEED™) Silver certification or, achieve the equivalency of any such certification, as determined by LACDPW. The County will require achievement of LEED™ Silver certification or equivalent for new buildings that will be 10,000 sf or larger. As currently planned, this will only include the Medical IPA (Building 52), Transitional Housing Buildings (Buildings G and H), and Food Services/Warehouse Building (Building 53).

Sustainable building practices require the conservation of scarce resources (e.g., water and energy); diversion of waste from landfills; minimization of impacts to existing infrastructure; and promotion of a healthier environment. Examples of sustainable building practices that could be incorporated into newly-constructed buildings to achieve a LEED™ Silver equivalency may include, but will not be limited to:

- Avoiding development on protected farmlands, within floodplains, on wetlands, or on protected habitats for Threatened or Endangered species;
- Providing preferred parking for vanpools and carpools;
- Providing water-efficient, low-flow fixtures and appliances, including faucets, dishwashers, laundry facilities, and toilets;
- Creating energy-efficient building envelopes, energy-efficient light fixtures, and daylighting to decrease use of artificial light;

- Including low-flow water-conserving sink, shower, and toilet fixtures;
- Providing convective cooling for more efficient HVAC systems;
- Providing drought-tolerant landscaping and pervious paving to conserve water; and
- Providing designated, on-site recycling collection areas and reusing existing concrete and asphalt paving as base material for new paving where feasible.

As discussed below, the Project will be implemented via a design-build contract. Because the determination of specific building features to be used to meet a LEED™ Silver equivalent is tied to a project's design process, the combination of features that will be applied to the Project will be determined during execution of the design-build contract. Compliance with the applicable requirements, including attainment of a LEED™ Silver equivalent, will be verified through the site plan review process, and final compliance will be determined by the LACDPW.

The Project site currently is capable of receiving up to 1 megawatt (MW) from the adjacent County-owned solar array. This renewable energy source will continue to be available to the Project site throughout construction and after Project completion.

3.3.4 REDUCED RECIDIVISM

A primary objective of the proposed MLWDC Project is to reduce recidivism through the provision of educational programs that are gender-responsive and provide inmates with the life skills and job skills necessary to facilitate a successful transition into post-incarceration life. Some of the programs proposed at MLWDC to reduce recidivism are described below.

Gender-Responsive Programming

The most frequent types of crimes committed by inmates (male and female) held within the County of Los Angeles jail system are drug offenses followed closely by property offenses and violent offenses. Approximately 70 percent of LASD jail populations meet the diagnostic criteria for substance use disorders (SUD). In addition, individuals that come into contact with the criminal justice system have higher rates of mental illness, unemployment, poor educational backgrounds, and homelessness which can contribute to higher rates of reoffending (DPH 2014).

As discussed above, the average number of inmates in the LASD population has increased due to a substantial number of inmates categorized as "N3" (i.e. non-violent, non-serious, non-sexual) serving their terms in County jail as mandated under AB 109. In 2014, the County's female inmate population consisted of approximately 2,300 inmates, 30 percent of whom were sentenced under AB 109 that meet the security qualifications as low- to medium-security level inmates, with no special medical or mental health needs. The remaining 70 percent of the female inmate population were awaiting court sentences (at the pre-trial phase) and eventual transfers (County of Los Angeles 2013d). According to the LASD, AB 109 female inmates are serving an average of 423 days in custody from date of sentencing to date of release, while non-AB109 female inmates serve an average of 107 days in custody (LASD 2015b). These longer sentences provide more opportunities for effective rehabilitative programming.

In 2013, LASD commissioned the National Institute of Corrections (NIC) to conduct an examination of its operational needs for women inmates in the LASD system. According to NIC, there is currently not enough gender responsive, trauma-informed programming that can address the complex needs of the diverse population of women housed at CRDF (EBIB 2014).

The study found that approximately 93 percent of the LASD female inmates have the need for substance use programs. Moreover, the data analysis revealed that approximately 70 percent of the female inmate population has a need for both substance use programs and cognitive behavioral therapy. The NIC study revealed the most effective programs for women to be the following:

- Cognitive behavioral and relational program models that incorporate women's strengths
- Drug and alcohol programs
- Victimization programs and trauma-informed services
- Mental health programs
- Relationship programs
- Programs involving family and community re-entry and job skills

In order to address the needs of the LASD's female inmate population, the LASD is proposing to implement a Gender-Responsive Rehabilitation (GRR) model at MLWDC that will focus on both gender-neutral factors associated with criminal offending (e.g., such as mental illness and substance abuse) as well as more gender-specific issues (e.g., trauma from sexual and/or physical abuse and self-esteem) (EBIB 2014).

The MLWDC Project has the ability to provide a normative (less institutional, more residential-like) and spatially therapeutic living environment for the female offenders. The facility's campus-like setting will encourage positive socialization and stimulate motivation for participation in positive activities that reduce idleness and negative behavior. Gender-Responsive Treatment studies have indicated that female offenders develop a sense of self and self-worth when they are provided consistent group therapy sessions, allowing them to connect with others. Group connection, not separation, promotes a sense of belonging and community for women. MLWDC will offer a variety of rehabilitation-type programs and services including Substance Use Disorder treatment, educational and vocational. Various programs will emphasis on parenting education, child development and contact visitation allowing for relationship/reunification with the female offenders and their children. Community Based Organizations (CBO's) along with LASD's Community Transition Unit (CTU), will work together to promote a continuum of treatment, recovery, and support services upon re-entry into the community.

As previously discussed, MLWDC will benefit from the establishment of an Advisory Board that will review the program model for the MLWDC to ensure that it is evidence based in reducing recidivism, as well as evaluate strategies to reduce negative impacts of operating the MLWDC away from the downtown Los Angeles area, including contract transportation for visitors, videoconferencing for attorney consultation, and reviewing national best practices for visiting and family reunification.

Education Based Incarceration Bureau (EBI)

The Education Based Incarceration Bureau (EBI) of the LASD will provide gender-responsible, evidence-based rehabilitative programs for women at MLWDC. The three major focuses of EBI programs are intake assessments, rehabilitative programs, and re-entry services.

Intake assessments ensure that inmates are placed in the most effective and positively impactful programs. Risk and need assessments are effective practices of intervention that also maximize use of limited resources for rehabilitative programs. Risk refers to those who have the highest probability of recidivating, thus needing the most intensive programs. Additionally, inmates should

be placed in programs that meet their criminogenic needs. Needs will be determined through a variety of tools, including: Northpoint Assessments, Test of Adult Basic Education (TABE), and substance abuse assessments. Targeting the individual needs of inmates with relevant programming can have important rehabilitative benefits.

Women housed at MLWDC will be placed in rehabilitative programs that will best meet their risk and needs based on the intake assessment process described above. These programs can include mental health counseling, Cognitive Behavioral Therapy (CBT), addiction recovery, anger management, relationship programs, parenting skills, spiritual growth, literacy education, English as a Second Language (ESL), high school diploma/GED, Career Technical Education (CTE), and community college courses. To ensure inmate needs are targeted, case management plans will be developed to create proper programming for each inmate.

Effective rehabilitative programs should prepare people for successful community re-entry and employment. Course selections will be determined based on students' risk to recidivate, their needs for specific services, and students' interest levels. Courses will be offered during three blocks of time each weekday (morning, afternoon, and evening), providing opportunities for inmates to be enrolled in multiple courses. Programs are also divided into three categories based on program intensity: all-day, half-day, and evening programs. Examples of all-day programs (morning and afternoon) include culinary arts programs, cosmetology programs, and Prisoner Assisted Community Enhancement (PACE). Examples of half-day programs (morning or afternoon) include: small engine repair; animal grooming/training; social media management and marketing/office assistant; automotive detailing, windshield and headlight repair; and recycling. Examples of evening programs include: computer coding; small business entrepreneurship; community college; Associate of Arts Degree; and General Education. Other programs of EBI include: pre-natal programs, volunteer programs; peer mentoring; physical education; dance; arts and crafts; a commissary program; and book clubs. The expectation of the inmates will be based on personal accountability and involvement in one's own program.

Additionally, EBI will provide other services at MLWDC that will be available to the inmates and support rehabilitative programming such as the Facility Library, Re-Entry Center, Women's Advisory Council, and inmate visiting. EBI also consists of a Community Transition Unit (CTU). CTU staff will support and assist with facility/program expectations and explain the role of CTU and the expectations of CTU discharge planners. CTU will implement and facilitate the SHARE (Stop Hate And Respect Everyone) Tolerance Program at MLWDC, and ensure that every inmate takes the two-hour course within the first week of arrival at MLWDC. The program is facilitated by CTU staff, whose goal is to educate participants about tolerance and respect for others, regardless of race, nationality, religion, or sexual orientation, among others. CTU staff will utilize a risk and needs assessment component. The risk assessment will assist CTU in determining if an inmate is suitable for release, and the needs assessment will assist CTU discharge planners with release plans for the inmates. EBI will work with the local workforce board and community-based organizations to develop programming that leads to living wage jobs and pursues potential partnerships of joint and free ventures for emerging employment opportunities.

Female Fire Camp Training Program

The LASD Fire Camp Training Unit was created in response to AB 109. In an effort to free up bed space within the LASD jail system for more serious offenders, the use of Fire Camps was found to an effective option to provide housing for qualified N3 offenders. The MLWDC proposes to provide a Female Fire Camp Training Program to eligible inmates. The purpose of the Fire Camp will be to instill in the participants a sense of community, where like-minded individuals can train and support each other in their goal of becoming wildland fire fighters.

Women who participate in the Fire Camp program will be provided a structured preconditioning fitness program while awaiting assignment to the California Department of Corrections and Rehabilitation CAL Fire Training course. Upon acceptance into the Cal Fire program, the inmates will be transferred to the California Institute for Women (CIW) where they will complete the Fire Camp program requirements.

The current process for female offenders interested in participating in the Fire Camp Training program involves an application process that includes a criminal history review and medical screening/physical exam. Eligible offenders are transferred to a dorm at TTCF where they are allowed to train in the limited space of the dorm dayroom and indoor exercise yard. Upon final approval, accepted inmates are transferred to the CIW for structured physical fitness training and formal CALFire training. Successful candidates are then transferred to Camp 13, Malibu, which houses female inmates.

The MLWDC program will be designed to prepare women to pass the physical fitness requirements so they can receive their "Gate Pass" (approval for travel outside prison facility), and proceed directly to the CALFire training course. The Fire Camp Program should enhance their chance of passing the rigorous training course, limit the occurrence of injuries, and expedite their entry into fire suppression duty at Camp 13, Malibu.

The structured preconditioning program proposed at MLWDC will include:

- Daily fitness regimen plan emphasizing overall body strength and cardio-pulmonary fitness;
- Daily running and/or leg strength exercises;
- Multi-phase fitness testing;
- Team building and personal growth exercises;
- Life Skills courses; and
- Culinary/Serve-Safe certificate programs to provide camp cooks and job skills.

The physical resources required for the MLWDC program include a running track and field, multi-joint exercise stations (pull ups, push-ups, dip bars, etc.), and concrete step station for leg strength and testing. The Fire Camp Program will provide training for up to 32 inmates at a time, supervised by LASD personnel, 5 days a week, 8 hours a day. The inmates will be housed in the same housing barrack; they will eat together, train together, and learn together. Inclusion into Fire Camp Program allows for additional good-time work-time credits with the fire camp inmates receiving a two-for-one sentence reduction while in the program.

3.3.5 PROJECT CONSTRUCTION

As shown on Exhibit 3-1, the buildings on the Proposed Site Plan are numbered and the functions of the buildings are color-coded to illustrate the functionality of the campus. Exhibit 3-2 shows existing buildings that will be subject to renovation and proposed new construction. A brief summary description of the proposed renovation, reuse, and function of each building, as numbered on Exhibit 3-1, is provided in Table 3-3.

**TABLE 3-3
BUILDING RENOVATION, REUSE AND FUNCTION**

Building	Previous Use	Action	Proposed Use
1	Administrative Offices	Major renovation of interior spaces; no structural renovations.	Area A: Jail Administration, Offices Area H: Data Systems Bureau/CITU
2	Visitation, Control, and Staff Offices	Major renovation of interior spaces; structural renovation of foundation, steel beams/columns, roof, seismic upgrades.	Area D: EBI, Administrative and teacher support functions, Offices
3	Infirmery and Processing	Major renovation of interior spaces; structural renovation of foundation, steel beams/columns, roof, seismic upgrades.	Area D: Visiting center
4	Inmate Services	Minor renovation of interior; structural renovation of foundation, steel beams/columns, roof, seismic upgrades.	Area D: EBI, Inmate Services, Cosmetology, General Education Classrooms, Career Counseling
5	Warehouse And Laundry	Minor renovation of interior; structural renovation of foundation, steel beams/columns, roof, seismic upgrades.	Area D: EBI, Computer and Vocational Classrooms
6	Vocational and Utility Shops	Minor renovation of interior; structural renovation of foundation, steel beams/columns, roof, seismic upgrades.	Area D: EBI, Vocational Shop and Utility/Maintenance Support
7	Individual Barracks	Minor renovation of interior	
8-21	Twinned Barracks	Minor renovation of interior; structural renovation of foundation, steel beams/columns, roof, seismic. Buildings 8 and 9, 10 and 11, 12 and 13, 14 and 15, 16 and 17, 18 and 19, and 20 and 21 will be joined by new buildings for dayroom use, which will approximately double the existing building size.	Area B: Twinned Barracks
22	Individual Barracks	Minor renovation of interior	Area B: Orientation Barracks (for new inmates that require orientation or separation from other groups)
23	Segregation Housing	Minor renovation of interior; no structural renovations.	Area B: Segregation Housing
24	Recreation	Minor renovation of interior; structural renovation of foundation, steel beams/columns, roof, seismic upgrades.	Area D: EBI, Indoor Recreation and Crafts
25	ICE Administration	Major renovation of interior spaces; structural renovation of foundation, steel beams/columns, roof, seismic upgrades.	Area D: EBI, Culinary Arts and the Learning Resource Center
27	ICE Courtrooms	Major renovation of interior spaces; no structural renovations.	Area A: Staff Services, Locker Rooms, Showers/Toilets
32	Modular Program Building	None	Reuse
41	Kitchen, Dining, Food Warehouse	Major renovation of interior spaces and kitchen; structural renovation of foundation, steel beams/columns, roof, seismic upgrades.	Area F: Food Services Storage, Kitchen, Dock Area D: Inmate Services Commissary Storage and support, Dining (will connect to Bldg 53)
E and F	Housing	Minor renovation of interior; no structural renovations; new building expansion to meet Title 24 code and standards requirements.	Area B: Housing (mix of single and double bunks with day space and courtyard).
G and H	N/A	New construction	Area B: Transitional Housing (single story dorm style)

**TABLE 3-3
BUILDING RENOVATION, REUSE AND FUNCTION**

Building	Previous Use	Action	Proposed Use
51	N/A	New construction	Area A: Entry, Staff Services, Main Control (will connect Administration Building and Staff Services)
52	N/A	New construction	Area C: Inmate Processing and Transportation Services Area E: Medical Services and Mental Health
53	N/A	New construction	Area F: Food Services, Storage, Refrigerated Storage, Loading Dock (will connect to Bldg 41)
55 and 56	N/A	New construction	Inmate Toilets
57	N/A	New construction	Sports court cover/roofing
CITU: Correctional Innovative Technical Unit; EBI: Education-Based Incarceration; ICE: U.S. Immigration and Customs Enforcement; N/A: not applicable. Source: DLR 2014			

As part of the Project, several buildings will be demolished, including the visiting restrooms and visitor booth (at the proposed Staff Parking Lot), scheduling/training room (at the proposed Executive Parking Lot), Barracks G (at the proposed Visitor Parking Lot), facilities service building (at the proposed Warehouse/Laundry Building), and kitchen armory and central plant (at the Kitchen).

Construction Schedule and Assumptions

As shown in Table 3-4, construction activities are expected to begin in December of 2016 and be completed by the fourth quarter of 2019, totaling approximately 35 months. Construction will occur during weekdays per the construction hour restrictions set forth in the County's Noise Ordinance, with no Sunday or holiday construction. Occupancy of the MLWDC will occur the last quarter of 2019.

**TABLE 3-4
ESTIMATED CONSTRUCTION SCHEDULE**

Phase	2017				2018				2019			
	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3
Demolition	◆	◆										
Site Preparation- Clearing and Grubbing		◆	◆									
Grading			◆									
Underground Utility Construction				◆	◆							
Building Construction				◆	◆	◆	◆	◆	◆	◆	◆	
Paving										◆	◆	◆
Architectural Coatings/Painting										◆	◆	◆

Anticipated export materials that will require off-site disposal include approximately 5,400 cubic yards (cy) of removed vegetation during the site preparation stage, and approximately 10,184 cy of demolition materials during the demolition stage. Approximately 35,000 cy of cut and fill will be balanced on-site through grading activities, and no import or export of soils will be required.

3.3.6 PROJECT OPERATIONS

Inmate Bookings and Releases

The current system of inmate booking/releasing will change with Project implementation. Currently, female inmates are booked into CRDF in Lynwood. With the Project, female inmates will be booked into and released from the County jail system at an Inmate Reception Center (IRC) located in downtown Los Angeles. No inmate booking or releasing will occur at MLWDC. Once an individual has been processed through IRC and meets the criteria for MLWDC, she will be transported from IRC by LASD's Court Services Transportation (CST) to MLWDC for housing processing. Inmates scheduled for release will be transported from MLWDC to IRC for release from that facility.

Upon arrival at the MLWDC, inmates will be taken to the facility's Inmate Processing Area (IPA) for a secondary search. Inmates receive a 60-day evaluation by the County Department of Mental Health and those inmates that reveal medical or mental health concerns will be immediately evaluated by Medical Services Bureau (MSB). Once cleared, the inmates will be assigned to an orientation dorm where qualifying inmates will be placed into appropriate programs and housed in barracks that specifically address the inmates' classification and rehabilitative needs. Inmates who are scheduled to appear in court will be transported to the courts or temporarily housed at the Twin Towers prior to their appearance date.

Inmate Visitation

The opportunities for both contact visits and video conferencing with female inmates will be increased when inmates are transferred to MLWDC from other jail facilities. Table 3-4 provides a comparison of visitation protocols between CRDF and MLWDC.

**TABLE 3-5
VISITATION PROTOCOL COMPARISON**

Visitor Type	CRDF		MLWDC	
	Weekends (Sat/Sun)	Weekdays (Mon–Fri)	Weekends (Sat/Sun)	Weekdays (Mon–Fri)
Adults Bonding with Children (i.e. Children Visits)	<ul style="list-style-type: none"> • By Appointment Only • Saturday Only • Supervision Required • Coordinated through DCFC 	CRDF: None	<ul style="list-style-type: none"> • By Appointment Only • Weekends and specified holidays • Supervision Required • Coordinated through DCFC 	MLWDC: None ¹
Contact Visits	CRDF: None	CRDF: None	<ul style="list-style-type: none"> • Weekends and specified holidays • By Appointment Only • 1 hour limit per week (or two 30-minute visits) 	MLWDC: None ¹
Non-Contact Visits	<ul style="list-style-type: none"> • By Appointment Only • Specified holidays • 1 hour limit per week (or two 30-minute visits) • Daytime hours only 	CRDF: None	<ul style="list-style-type: none"> • By Appointment Only • Weekends and specified holidays • 1 hour limit per week (or two 30-minute visits) • Daytime hours only 	MLWDC: None
Video Visits	<ul style="list-style-type: none"> • By Appointment Only • 1 hour limit per week (or two 30-minute visits) • Daytime hours only 		<ul style="list-style-type: none"> • By Appointment Only • No maximum weekly time limit • Daytime and evening appointments available 	
Professional Visits	<ul style="list-style-type: none"> • By Appointment Only 		<ul style="list-style-type: none"> • By Appointment Only 	
DCFS: Los Angeles County Department of Children and Family Services				
¹ Occasional court-ordered visitation could occur during the weekdays, but such visits scheduled by appointment only and are not normal protocol.				

Contact visits refer to opportunities for inmates and visitors to interact face to face, allowing for physical contact. Non-contact visits refer to visitations where the inmate and the visitor are separated by a glass barrier, and no physical contact is allowed. Video visits refer to long-distance visitation that can occur through a video conferencing program, allowing the inmate and the visitor to hear and see each other via the computer and screen. As is the case at CRDF, these types of visits will continue to require an appointment and only be available to qualifying inmates such as those inmates housed in privileged or transitional housing areas.

Professional visits include meetings with the inmate's lawyers, mental health professional, and/or court-assigned representative. These visits are also subject to appointments, and are available to all inmates, and the visitation protocol will not change at MLWDC.

As shown in Table 3-5 above, at minimum, additional visitation opportunities will be available for MLWDC inmates on weekends for contact visits. These will be by appointment only and limited to 1 hour per week. Additionally, MLWDC will have a substantial increase in video visitation opportunities when compared to the video-visitation at CRDF. A combined minimum of 34 video-

visiting stations will be provided in Building 3 and within each of the barracks, along with video interview rooms in transitional housing buildings, compared with 2 video booths at CRDF.

In addition to increased opportunities for video-visiting at the MLWDC site, the LASD is in the process of expanding the number of locations throughout the County to afford visitors/families access to video visiting equipment. Currently, seven LASD stations are equipped with Inmate Video Visitation System (IVVS) accessible to the public. They are Lakewood, San Dimas, Norwalk, Carson, Lancaster, Palmdale, and East Los Angeles. Each of these seven LASD stations currently has one public facing video visiting station installed. These 7 video stations are available for visitor/family access and are able to communicate with inmates housed at all our current jail facilities throughout Los Angeles County. As funding becomes available, the LASD intends to complete the expansion of IVVS into the remaining LASD stations throughout Los Angeles County and increase the number of video units inside the inmate housing units at a rate of 40 to 50 new video visiting stations per year. Additional video units will also be installed in the public visiting areas of the jail facilities. The next expansion of 40 custody video stations will occur by late November 2015. As of January 1, 2016, all LASD stations will be required to log/report the visits into the IVVS and future station inspections will require the log/report from IVVS to demonstrate the station is in compliance. In 2016, LASD will launch a test pilot program that will allow visitors to video conference from home or office (LASD 2015a).

On-Site Programs and Services

To provide for an education-based incarceration, the Project will offer general education classes, computer training, general and vocational career technical education, college courses, career counselling, a learning resource center, a library and computer labs, culinary classes, and indoor/outdoor recreation for inmates. Other services include religious services, counseling services, and community transition services. Except for those areas identified as temporary or discipline housing, all inmates will have meals at the dining hall. Participation in classes, training, and other activities will be scheduled for each inmate according to individual evaluation, interests, needs, and availability. Outdoor recreation will be provided for inmates in each housing zone for at least one hour per day.

Each inmate will be eligible for two or more non-contact visits (via phone and video) per week during Saturdays and Sundays, during dayshift hours (8:00 AM to 6:00 PM) and designated holidays. Contact visits will be allowed for inmates who meet established criteria and will be based on visiting volume, scheduled visits, and available time. Attorney visits will be allowed during normal business hours. Visitation systems and protocols at the facility will include visitation areas in two buildings and video visitation rooms and video interview rooms in transitional housing.

On-site medical practitioners will provide obstetrics, gynecological, dental, orthopedic, and dermatology services. Radiology and laboratory services will be available for diagnostic testing. An on-site pharmacy will be available for medication dispensing. Licensed nursing personnel will provide nurse clinics, sick call, and preventative medical care education. Rooms equipped for tele-medicine and tele-psychiatry will be available to augment on-site services. Medical situations will be evaluated and handled by on-site MSB staff or transported to the IRC for further evaluation by the appropriate medical/mental health clinician. The Los Angeles County Fire Department Paramedics will handle life threatening medical emergencies and inmates may be transported to local hospitals, as appropriate.

Staffing

The Project will be staffed by approximately 523 employees in total, with approximately 225 employees during the AM shift (6:00 AM to 2:00 PM); approximately 177 employees during the PM shift (2:00 PM to 10:00 PM); and approximately 121 employees during the EM shift (10:00 PM to 6:00 AM). This will include LASD security/sworn staff, LASD civilian staff, teachers, counselors, maintenance personnel, physicians, registered nurses, registered nurse practitioners, contractors, and other County employees. A number of community-based volunteers are also anticipated at the site to provide training and assist with visitation. While it is expected that many of these positions will be filled by former LASD employees who were assigned to the MLWDC and existing LASD employees who will choose to transfer to the Project.

3.4 DESIGN-BUILD PROCESS

On June 17, 2008, the Board of Supervisors approved the County's use of the "design-build" contracting authority as an option for applicable County construction projects in excess of \$2.5 million. Design-build contracting is a process in which both the design and the construction of a project are procured from a single entity. In addition to expediting Project completion, the design-build project delivery method is anticipated to provide a more collaborative approach that could result in reduced costs and improved design quality.

The design-build method differs from the traditional design-bid-build contracting method whereby the County retains an architectural/engineering specialist to prepare design criteria and preliminary plans, which the County then adopts and advertises for another firm to complete the design and build the project. Under the design-bid-build method, the California Environmental Quality Act (CEQA) documentation is prepared after the design is complete and prior to bidding on the builder's contract. In contrast, the design-build method awards the entire design-build contract to a qualifying firm, and the CEQA documentation is completed prior to the final design stage. The County will use this design-build process to implement the Mira Loma Women's Detention Center (MLWDC) Project, if approved by the Board of Supervisors.

The preliminary Project plans included within this EIR provide a conceptual design and preliminary site plan that will be altered/refined during the design-build process. Therefore, the building configuration, construction and design details, and arrangement of services within each building is preliminary and subject to the review and approval of the County of Los Angeles. As such, the information provided in Section 3.4, Project Description, includes a summary description of the preliminary conceptual design for the Project. When details of design and/or operations are uncertain, the Project Description sets forth the most realistically conservative development scenario in order to comprehensively assess the potential environmental impacts. Upon completion of design, prior to Project implementation, the County will evaluate the final Project design in light of the CEQA documentation to determine whether any additional environmental evaluation and documentation pursuant to CEQA will be required.

If substantial changes to the Project, substantial changes to the circumstances under which the Project is undertaken, and/or new information of substantial importance becomes available after the certification of this EIR, the County will evaluate the need for supplemental environmental documentation per Sections 15162 to 15164 of the CEQA Guidelines.

This EIR is intended to provide the County with a comprehensive analysis of potential environmental impacts associated with the construction of the MLWDC that also allows for flexibility in Project implementation. As discussed above, the full build-out of the Project will encompass approximately 365,000 square feet of inhabitable space among an approximate 46 acre site. At a minimum, the Project will include required dayroom space additions for inmate

use, medical clinic facilities, inmate processing center, education based programming and vocational classrooms, a learning resource center (library), new transitional housing units and necessary facilities for administration and staff operations. As discussed above, the Project will be delivered through the design-build methodology; the final design of the facility will not be determined until a design-build contract is awarded and the design phase is complete with jurisdictional approvals. As a result of this design-build approach, in which all assumptions made about the final product are conservative and assume the reasonably worst-case development scenario, some impacts analyzed in the EIR may be overstated. The design of the Project may explore a range of programming solutions ultimately leading to the most efficient functional expression of the Project needs and may be achieved within less square footage and acreage if determined through the design-build process.

3.5 **DISCRETIONARY ACTIONS**

3.5.1 **LEAD AGENCY**

The County of Los Angeles, as the Lead Agency, is responsible for preparing the EIR and will review and consider the EIR in its discretion and approve, revise, or deny the Project with findings, as appropriate. The EIR will serve as the primary environmental document for implementation of the Project, including all required discretionary approvals for implementation. Discretionary actions to be considered by the County may include, but are not limited to the following:

- Approval of the Mira Loma Women's Detention Center Project and related actions, such as allocating funding for the Project.
- Approval for Award of Design-Build Contract. The County of Los Angeles Board of Supervisors will need to authorize the LACDPW to pursue implementation of the Project through the issuance of design-build contract and other appropriate approved contracting methods.

3.5.2 **RESPONSIBLE AND TRUSTEE AGENCIES**

The EIR will provide environmental information to responsible, trustee, and other public agencies that may be required to grant approvals or coordinate with the County of Los Angeles as a part of Project implementation. These agencies may include, but are not limited to:

- **Board of State and Community Corrections.** For approval of building plans in accordance with Title 15 and Title 24 of the *California Code of Regulations* and inspection of the detention facility for compliance with State operating standards.
- **State Public Works Board.** For oversight of Project funding under AB 900 through an irrevocable leasehold interest in the facility during the term of the lease-revenue bonds.
- **State Water Resources Control Board.** For coverage under the National Pollutant Discharge Elimination System (NPDES) Construction General Permit.
- **State Fire Marshal.** For approval of building plans for compliance with the California Fire Code.
- **California Department of Transportation, District 7.** For approval of a Transportation Permit for oversized vehicles, if applicable.
- **California Department of Fish and Wildlife.** For issuance of a Streambed Alteration Agreement for impacts to jurisdictional drainages, if applicable.

- **Antelope Valley Air Quality Management District.** For approval of a Dust Control Plan, and a permit to operate emergency diesel backup generators.
- **Lahontan Regional Water Quality Control Board.**
 - For compliance with General Permit for Storm Water Discharges from Small Municipal Separate Storm Sewer Systems (MS4), Order No 2013-0001-DWQ, NPDES No. CAS000004 (or the latest approved MS4 General Permit).
 - For issuance of a Water Quality Certification for impacts to jurisdictional drainages, if applicable.
- **Los Angeles County Fire Department.** For approval of building and site plans for compliance with the California Fire Code with County amendments.
- **Los Angeles County Department of Public Works.** For approval of building and site plans for conformance with the County of Los Angeles Building Code; the Electrical Code; the Plumbing Code; the Mechanical Code; and all applicable County policies, ordinances, and programs.
- **County Sanitation Districts of Los Angeles County, District No. 14.** For approval of any increase the quantity or strength of wastewater discharges to pay a fair share of the costs for providing additional conveyance, treatment, and disposal facilities, if necessary.
- **Los Angeles County Waterworks District 40.** For approval of any connections to existing water lines to serve the Project.
- **City of Lancaster.** For permits to construct improvements within any City-owned property and public rights-of-way, if necessary.

3.6 REFERENCES

- Board of State and Community Corrections (BSCC). 2015 (May, last accessed). Jail Profile Survey Query. Sacramento, CA: BSCC. http://www.bscc.ca.gov/s_fsojailprofilesurvey.php.
- . 2014 (September 18, last update). Rated Capacities of Type II, III, & IV Local Adult Detention Facilities (December 2006–June 2014). Sacramento, CA: BSCC. http://www.bscc.ca.gov/s_fsojailprofilesurvey.php.
- . 2013 (August). Rated Capacities and Facility Population- May 2013 BSCC Inspection. Sacramento, CA: BSCC.
- DLR Group. 2014 (September 30). Design Criteria Document. Santa Monica, CA: DLR Group
- Education Based Incarceration Bureau (EBIB). 2014 (February). Mira Loma Center for Women Program Model (Appendix E-4 of Los Angeles County Jail Plan Final Report, Volume 7). Captain Michael Bornman. Los Angeles, CA: LASD.
- Los Angeles, County of, Chief Executive Office (CEO). 2013a (July 12). Letter to the Board of Supervisors. Jail Plan (Item No. S-1, Agenda of March 19, 2013). Los Angeles, CA: CEO
- . 2013b (August 20). Letter to the BSCC. Assembly Bill 900- Pitchess Detention Center Women's Village Request for Information on Changing Project Location SB 1022-AB 900 Potential Grant Coordination. Los Angeles, CA: CEO

- . 2013c (October 22). Letter to the Board of Supervisors. Mira Loma Detention Center Proposed Women's Village Project Revise Project Site, Authorize Site Assurance Resolution, Approve Project Budget and Appropriate Adjustment, and Establish Capital Project No. 69719. Los Angeles, CA: CEO.
- . 2013d. (July 5). *Los Angeles County Jail Plan Independent Review and Comprehensive Report – Final Report*. Prepared by Vanir Construction Management, Inc.
- Los Angeles County Department of Public Health (DPH). 2014 (April). Treatment Program Narrative for the Operation of the Mira Loma Detention Facility Substance Use Disorder Treatment Program, Version I (Appendix E-3 of Los Angeles County Jail Plan Final Report, Volume 7). Los Angeles, CA: LASD.
- Los Angeles County Internal Services Department (ISD). 2015 (June 30). Letter to the Board of Supervisors. Approval of Revised Board Policy Number 3.045-Countywide Environmental Sustainability (All Districts-3 Votes). Los Angeles, CA: LASD.
- Los Angeles County Sheriff's Department (LASD). 2015a (September 9). Inmate Video Visitation System (IVVS) Update provided via email by Deputy Richard Velazquez, from Correctional Innovative Technology Unit. Email correspondence from M.L. Jacobs (Lieutenant with Los Angeles County Sheriff's Department) to A. Ramos (Project Manager with Los Angeles County Department of Public Works) on Wednesday, September 9, 2015.
- . 2015b (May 12). Email correspondence from K.M. Porowski (Lieutenant with Los Angeles County Sheriff's Department) to A. Ramos (Project Manager with Los Angeles County Department of Public Works) on Monday, May 18, 2015.
- . 2014 (September 29). Mira Loma Women's Detention Center Operations Plan. Los Angeles, CA: LASD.
- Vanir Construction Management, Inc. (Vanir). 2013. (July 5). Los Angeles County Jail Plan Independent Review and Comprehensive Report – Final Report. Los Angeles, CA: County.

This page intentionally left blank

SECTION 4.0 ENVIRONMENTAL ANALYSIS

Section 4.0 analyzes the potential environmental impacts associated with approval and implementation of the proposed Mira Loma Women's Detention Center (MLWDC) Project. The environmental analyses within this section of the Environmental Impact Report (EIR) focus on the impacts from short-term construction and long-term operation of the proposed Project, and impacts associated with proposed off-site infrastructure improvements. This section of the EIR also addresses the Project's potential short-term, long-term, direct, indirect, and cumulative environmental impacts.

The following environmental issues are subject to analyses:

- Section 4.1: Aesthetics
- Section 4.2: Air Quality
- Section 4.3: Biological Resources
- Section 4.4: Cultural Resources
- Section 4.5: Geology and Soils
- Section 4.6: Greenhouse Gas Emissions
- Section 4.7: Hazards and Hazardous Materials
- Section 4.8: Hydrology and Water Quality
- Section 4.9: Land Use and Planning
- Section 4.10: Noise
- Section 4.11: Population and Housing
- Section 4.12: Public Services and Recreation
- Section 4.13: Transportation and Traffic
- Section 4.14: Utilities and Service Systems
- Section 4.15: Energy

Under each section, a summary of the methodology used for the analysis, including technical studies and/or other sources, is provided. This is followed by a discussion of the existing regulatory setting. Environmental conditions within the Project site and in the surrounding area are then presented to provide the baseline with which environmental changes from the proposed Project would be analyzed. The thresholds used to determine the significance of impacts follows.

Prior to the environmental impact analysis, Project Design Features (PDFs) and Regulatory Requirements (RR) are listed and numbered. PDFs are specific design elements incorporated into the Project that are included in the Project's contractor specifications and final plans, which are implemented in accordance with County protocol to prevent the occurrence of, or reduce the significance of, potential environmental effects. Because PDFs have been incorporated into the Project, they do not constitute mitigation measures as defined by the California Environmental Quality Act (CEQA). However, PDFs are identified in the Mitigation Monitoring and Reporting Program (MMRP) for convenience of tracking to ensure compliance monitoring.

RRs include applicable local, State, or federal regulations that are required independently of CEQA review and also serve to prevent the occurrence of, or reduce the significance of, potential environmental effects. Typical RRs include compliance with the provisions of the California

Building Code, South Coast Air Quality Management District rules, local agency requirements, and other regulations and standards. RRs are identified in the MMRP for convenience of tracking to ensure compliance monitoring.

An analysis of the potential environmental impacts that may result from the Project and proposed off-site infrastructure improvements follows. This impact analysis assumes the implementation of PDFs and RRs. The analysis addresses each applicable impact threshold, and includes a discussion of cumulative impacts at the end. Where a potentially significant environmental effect has been identified, Project-specific mitigation measures (MMs) are included. Section 15126.4(a) of the State CEQA Guidelines requires lead agencies to consider feasible MMs to avoid or substantially reduce a project's significant environmental impacts.

A summary of the significance of environmental impacts after compliance with the PDFs and RRs and implementation of the MMs, if any, are then stated for each environmental issue. References used in the section are listed at the end.

4.1 **AESTHETICS**

The analysis of Aesthetics identifies and evaluates key visual resources on the Project site and the surrounding area and determines the degree of visual impact that would be attributable to the Project. This analysis identifies key visual resources that may be affected by the Project and assesses whether the integrity of the landscape, the quality of one's view, and/or the overall visual perception of the environment would be maintained in the post-Project condition. This section contains the following: (1) a description of the existing aesthetic character of the Project site and the surrounding area; (2) a description of views of the Project site; and (3) an analysis of the potential changes in visual quality as well as the light and glare effects associated with implementation of the Project, as considered in the context of applicable regulatory requirements.

The assessment of visual and light and glare changes presented in this section is based on field reconnaissance, review of aerial photographs and site photographs, and an evaluation of the Project's preliminary site plan, in comparison to existing conditions. The visual character of the Project is one of many considerations weighed in the determination of overall land use compatibility, which also includes factors such as Air Quality (Section 4.2), Noise (Section 4.10), and Traffic (Section 4.13). Please refer to Section 4.9, Land Use and Planning, of this EIR for an analysis of the Project's compatibility with surrounding land uses.

4.1.1 **RELEVANT PROGRAMS AND REGULATIONS**

State

California Scenic Highway Program

The California Department of Transportation (Caltrans) Scenic Highway Program (as contained in the *California Streets and Highways Code*, Sections 260–263) recognizes the visual resources and natural scenic beauty of California highways and adjacent corridors. Caltrans defines a scenic highway as any freeway, highway, road, or other public right-of-way that traverses an area of exceptional scenic quality. The Scenic Highway Program includes a list of either officially designated scenic highways or highways that are eligible for such designation. The status of a scenic highway changes from “Eligible” to “Officially Designated” when the local governing body applies to Caltrans for scenic highway approval and adopts a Corridor Protection Program that (1) regulates land use and density of development along the highway; (2) controls outdoor advertising; (3) provides guidelines for site planning; (4) controls earth-moving and landscaping activities; and (5) provides design guidelines for the appearance of structures and equipment. Caltrans approval leads to official designation and inclusion in the list of the State's Scenic Highways. There are no designated or eligible highways near the Project site. The nearest eligible State Scenic Highway is Interstate (I) 5 located approximately 30 miles south of the Project site (as the crow flies) and on the southern side of the Sierra Pelona Mountains (Caltrans 2011).

County

Draft Antelope Valley Area Plan

The Los Angeles County's draft *Antelope Valley Area Plan* does not apply to the Project site, since the site is located within the boundaries of the City of Lancaster. However, the draft *Antelope Valley Area Plan* identifies several local roadways in nearby unincorporated areas as Scenic Drives, including a segment of 90th Street West (from Avenue K to the northern County line) and a segment of West Avenue I (from 90th Street West to 120th Street West) (LACDRP 2014). These Scenic Drives are located approximately 3.0 miles west of the Project site. The draft *Antelope*

Valley Area Plan is expected to be adopted by mid-2015 and will be effective in the unincorporated County area following its final adoption (Nadela 2014).

County Lighting Standards

The County has adopted rural outdoor lighting standards, as set forth in the County Code (Chapter 22.44, Part 9), that are intended to reduce light pollution and preserve the nighttime environment. These standards apply to unincorporated areas in the Antelope Valley and include an exemption for public facilities, such as a detention facility operated by the Sheriff, if the lighting is needed for security and operation of the facility. Chapter 22.52 of the County Code also regulates lighted signs and parking lot lighting to prevent light from being “directed or beamed upon a public street, highway, sidewalk, or adjacent premises so as to cause glare or reflection that may constitute a traffic hazard or nuisance” and “to prevent glare or direct illumination in any residential or agricultural zone”.

City

Lancaster Municipal Code

The Lancaster Municipal Code does not apply to the Project since the site is owned by the County of Los Angeles. However, areas outside the boundaries of the County property and in public rights-of-way are subject to the Lancaster Municipal Code. Chapter 17.08.140, Outdoor Lighting, of the Lancaster Municipal Code requires that lighting be part of the architectural concept and that fixtures, standards, and all exposed accessories must be compatible with the building design. Lighting must be placed to provide adequate illumination for security and safety. Lighting used to illuminate the premises must be directed away from adjacent properties and be designed and located in a manner that prevents glare onto adjacent properties.

Lancaster Design Guidelines

The City of Lancaster has adopted *Design Guidelines* that provide the basis for achieving quality design in all new development, redevelopment, and renovation in the City, except where a project is implemented pursuant to a Specific Plan. While on-site improvements would be subject to County standards and guidelines, any improvements within the City's right-of-way would be regulated by the City of Lancaster's Design Guidelines. The Guidelines provide solutions for smart development, site design, streetscape design, building architecture, form and character, with separate recommendations for site design and architecture for each land use type (Lancaster 2009b). Compliance with the Guidelines is subject to review and approval by City staff and the City's Architectural and Design Commission (Lancaster 2014).

4.1.2 EXISTING CONDITIONS

The approximate 46-acre Project site is located at the southeast corner of West Avenue I and 60th Street West in the City of Lancaster, part of an approximate 620-acre block of County and State properties. The Project would be developed on a portion of the existing Mira Loma Detention Center (MLDC) property, which is visually presented in Exhibit 2-2, Aerial Photograph and Land Uses, in Section 2.0, Environmental Setting. As shown, the MLDC property is shaded in tan, and the MLWDC Project site boundary is also depicted. The Project site is located at the northwestern corner of the block, with other County facilities occupying the northern half of the block, including a County-operated solar energy facility, the County Probation Department Challenger Memorial Youth Center (CMYC), the former High Desert Health System Multi-Service Ambulatory Care Center (HDHS MACC), and County Animal Care and Control – Lancaster Shelter. The California

State Prison, Los Angeles County (CSP-LAC) occupies the approximately 262 acres at the southern portion of the block.

On-Site Visual Character

The Project site consists of multiple buildings, as shown on Exhibit 2-3, Existing MLDC Facilities, in Section 2.0, Environmental Setting. The topography of the Project site and surrounding areas is relatively flat, with on-site elevations ranging between 2,348 feet above mean sea level (msl) and 2,354 feet above msl, with a slight slope to the northwest. The site includes non-secured visitor, staff and support facilities, as well as a secured (i.e., fenced and guarded) inner core of facilities for the inmates. This core is further subdivided into various secure zones, with access controlled by fences and staff. The site includes athletic fields, basketball courts, and other open space areas with turf grass for use by inmates.

As shown in Exhibits 4.1-1a, 4.1-1b, 4.1-1c, and 4.1-1d On-Site Photographs, the Project site has an institutional character due to the utilitarian nature of the facility, which is exemplified by the security fencing with barbed wire that separates various sections of the site, tall exterior flood lights, internal paved roadways and parking areas, and security watch towers. The Project site's character has an emphasis on functionality rather than aesthetics, which matches the general style, height, and density of the surrounding facilities within the County and State-owned property. On-site structures are generally single-story rectangular buildings with concrete masonry walls in cream/beige and a blue wainscot and doors; structures also feature gable roofs and rooftop equipment. Other structures are steel-framed buildings with metal siding. Some of the structures are in disrepair, which contributes to the lack of aesthetic quality. Scattered mature trees and minimal ornamental landscaping are located throughout the Project site.

Off-Site Visual Character

As shown in Exhibits 4.1-2a and 4.1-2b, Off-Site Photographs, the Project site is surrounded by other County and State facilities to the east and south and has sparsely developed open spaces to the north and west. The Project site is visible from the surrounding public roadways and adjacent land uses. The primary viewers of the Project site include the following: (1) motorists, site visitors, pedestrians on the surrounding streets (primarily along West Avenue I and 60th Street West) who have temporary, short-term views, including those who are temporarily in the Project site vicinity, (2) employees and visitors of the various County and State facilities surrounding the Project site; and (3) people at residences located north and west of the Project site, who have permanent and long-term views of the site. Street views consist mainly of security fencing and guard towers at various locations, surface parking area, and buildings on West Avenue I and surface parking lots, office buildings, an at-grade reservoir and raised water tank, and overhead power lines on wooden poles along 60th Street West.

Land Uses to the North

The area located immediately to the north and northwest of the Project site includes ancillary facilities that are part of the MLDC, but are outside the primary secured area and outside the Project site boundary. Many of the buildings found in this area are associated with the military airfield uses that previously operated at the site, including the War Eagle airfield control tower, the Silver Bullet Theater, and other barracks and historic hangar facilities. The uses of these various buildings have changed over the years, but all of them are currently vacant or used for storage. The land north of West Avenue I is largely vacant and undeveloped, with the exception of a few single-family residential homes. Two residential properties are located approximately 0.20-mile and 0.32-mile from the Project site boundary, located along 57th Street West and



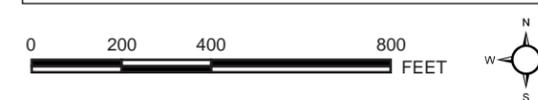
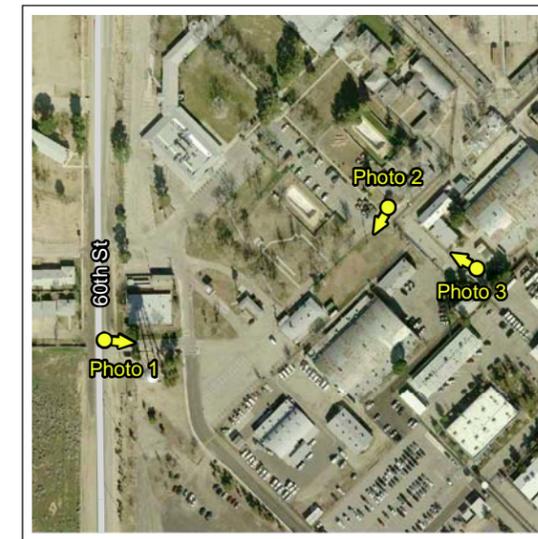
Photo 1: This photograph depicts the primary entrance to the Project site for staff and visitors. In the foreground is the driveway and entrance road, water tank structure, mature trees, and MLDC signage. In the background are off-site structures that would not be altered by the Project, including one of the historic hangars.



Photo 2: This photograph depicts paved and turf grass areas, utilities, and mature trees that would be removed and redeveloped into the Visitor Parking Lot. Large structures in the background include one of the historic hangars and the water tank.



Photo 3: This photograph depicts fencing, paved areas, and structures that would be removed and redeveloped into the Visitor Parking Lot.



On-Site Photographs

Mira Loma Women's Detention Center

Exhibit 4.1-1A



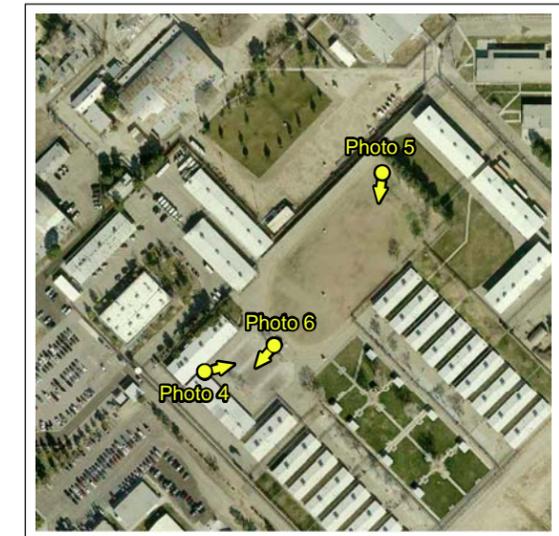
Photo 4: This photograph depicts the paved game courts in the foreground with the open field and barracks in the background, all enclosed within security fencing. The buildings are one-story structures painted in blue and cream colors. Scattered trees are present in this area, with turf grass in the area between the barracks.



Photo 5: This photograph depicts a closer view of the soccer field, mature trees scattered throughout the site, and some of the dormitories located on the southern section of the Project site.



Photo 6: This photograph depicts a closer view of the paved game courts and Building 25 located near the central part of the Project site.



On-Site Photographs

Mira Loma Women's Detention Center

Exhibit 4.1-1B





Photo 7: This photograph depicts the War Eagle Field control tower, which is located between the proposed Visitor Parking Lot and the Administrative/Visitor buildings and would not be altered by the Project.



Photo 8: This photograph depicts the corridor of dormitories, separated by chain link fencing, and associated grassy areas with mature trees.

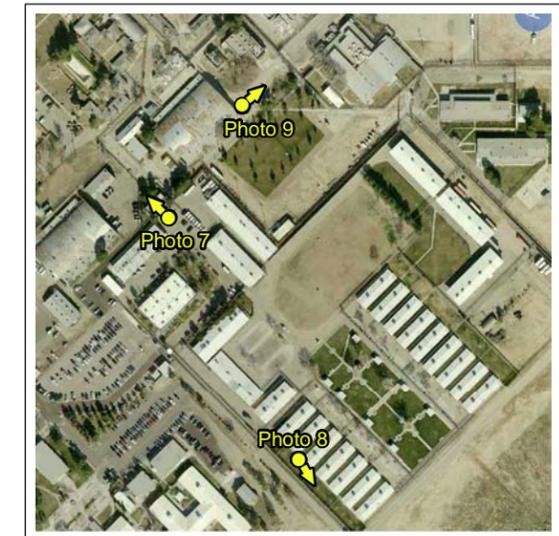


Photo 9: This photograph depicts the view of the northern section of the Project site, which shows the Central Plant building and the facilities services building behind the chain-link fencing.

On-Site Photographs

Mira Loma Women's Detention Center

Exhibit 4.1-1C





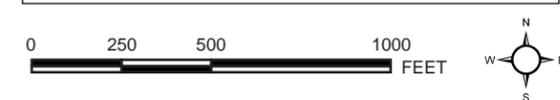
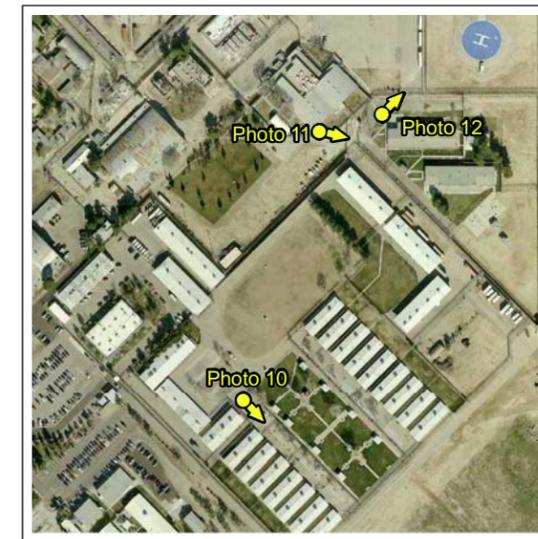
Photo 10: This photograph depicts the chain-link fencing (topped with barbed wire coils), which is in front of the dormitories pictured on the right side of the photo.



Photo 11: This photograph shows both dormitory buildings Building E and Building F on the northeastern section of the site. As with other buildings, this one-story blue and cream building with a gable roof reflects the characteristics of the buildings on the site.



Photo 12: The photograph depicts the chain-link fencing with barbed wire coils and floodlights that surrounds the secured areas of the northeastern edge of the Project site. There is a distant view of the helicopter landing pad in the center of the photograph, behind the chain-link fencing.



D:\Projects\COLACEO\001\Graphics\Aesthetics\Ex_SpE_20151023.ai

On-Site Photographs

Mira Loma Women's Detention Center

Exhibit 4.1-1D

Bonterra
PSOMAS

(10/23/2015 LEW) R:\Projects\COLACEO (LAE)\001\Graphics\EIR\Ex4.1-1D_SP_20151023.pdf



Photo 13: This photograph was taken from the Project's outside perimeter, looking west across 60th Street West. This view depicts the offsite land uses, with residential uses to the right and undeveloped land to the left of the photograph.



Photo 14: This photograph depicts the segment of 60th Street West looking south. 60th Street West has dirt shoulders and overhead utility lines on wooden poles along the site boundaries. This photograph also depicts undeveloped space to the west of the Project site boundaries.

Off-Site Photographs

Mira Loma Women's Detention Center



Photo 15: This photograph depicts the offsite intersection of 60th Street West and West Avenue I. This view shows the overhead utility lines on wooden poles, undeveloped land, and open spaces to the west and north of the Project site.



Photo 16: This photograph depicts a segment of West Avenue I looking east along the site boundaries, with dirt shoulders and an earthen ditch. The site boundary is lined with security fencing, flood lights, and a guard tower, while the other side of the street has overhead utility lines on wooden poles and abut undeveloped land.



Photo 17: This photograph depicts one of the primary views of the Project site from vehicular travelers along West Avenue I and from land uses to the north of the Project site. The driveway would be used as the primary ingress/egress for inmate transport. As shown, chain link fencing, paved roadways, utilities, light poles and low-rise buildings are the primary visible on-site structures.



Photo 18: This photograph depicts a southern view of 50th Street West, showing undeveloped land and a drainage ditch.

Off-Site Photographs

Mira Loma Women's Detention Center

Exhibit 4.1-2B



60th Street West, respectively. The character of this area could be described as rural open space with scattered residential land uses and undeveloped land.

Land Uses to the East

The County's solar energy facility is located immediately to the east of the MLDC, which is surrounded to the north/south by undeveloped land, chain-link fencing, and dirt roads. The solar facility is next to the County Probation Department's CMYC, which is located approximately 0.17 mile east of the Project site, which is next to the County Animal Care and Control – Lancaster Shelter, which is located approximately 0.36 mile east of the Project site. Both these facilities include several single-story structures that are surrounded by surface parking, non-landscaped undeveloped areas, and fencing. These facilities could be described as older institutional buildings with emphasis on functionality rather than aesthetics. Further east across 50th Street West is largely vacant and undeveloped, with the exception of a few single-family residential homes along West Avenue I. The character of this area could be described as rural open space with scattered residential land uses and undeveloped land.

Land Uses to the South

The former HDHS MACC is located directly southwest of the Project site and was an outpatient medical services facility. It is largely vacant and includes mostly unoccupied buildings. The former HDHS MACC is surrounded by large surface parking lots, roads, some landscaped areas, and storage/warehouse structures. The CSP-LAC is located further south on the southern 262 acres and consists of large paved areas; numerous single-story buildings surrounded by chain-link fencing; surface parking; solar facilities; and minimal landscaped areas. It is surrounded on the east, south, and west by a wide and unchannelized County-owned open storm drain. The former HDHS MACC and CSP-LAC are institutional buildings designed with emphasis on functionality rather than aesthetics.

The land south of West Avenue J consists of residential subdivision developments at 60th Street West and 52nd Street West, as well as undeveloped vacant land. The character of this area could be described as suburban residential surrounded by rural open space.

Land Uses to the West

West of the Project site, there is surface parking and some structures associated with the former military airfield and prison uses (e.g., warehouses, water utility facilities, and the prominent elevated water tank adjacent to 60th Street West). The land west of 60th Street West is largely vacant and undeveloped, with the exception of a small apartment complex located to the west of the Project site, and the Sheriff's Bachelor Officer's Quarters (BOQ). The nearest apartment is approximately 0.15 mile from the proposed operations and buildings internal to the site. The character of this area could be described as rural open space with a mix of low density land uses and undeveloped land.

Light and Glare

Existing sources of light or glare at the Project site include security lighting on existing buildings, floodlights throughout the site, and streetlights and traffic signal lights at the intersection of West Avenue I and 60th Street West. The Project site has nighttime illumination typical of institutional facilities (e.g., security and way-finding lighting), while the surrounding areas have nighttime illumination typical a rural community with limited development. Lighting levels are dictated by the presence of streetlights and exterior lights at adjacent County facilities, the State prison, and scattered residential developments in the Project vicinity. Transient lighting from

vehicular headlights also contributes to nighttime illumination in the Project area, but is limited. The solar energy facility east of the site and within the State prison may generate glare from certain angles during certain times of the day and the year, but there are no existing buildings or other man-made features on the Project site that are constructed of materials that could cause substantial glare.

Some land uses are considered "light-sensitive receptors", including residences and hospitals, because these uses may be adversely affected by increased ambient nighttime light levels. In the vicinity of the Project site, the nearest sensitive receptor is along 60th Street West approximately 65 feet from the anticipated construction of the access/entrance to the Project site and approximately 0.15 mile from the proposed operations and buildings internal to the site.

4.1.3 THRESHOLDS OF SIGNIFICANCE

The following thresholds of significance are derived from the Environmental Checklist in Appendix G of the CEQA Guidelines. A project would result in a significant adverse impact related to Aesthetics if it would:

- Threshold 4.1a:** Have a substantial adverse effect on a scenic vista.
- Threshold 4.1b:** Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State scenic highway.
- Threshold 4.1c:** Substantially degrade the existing visual character or quality of the site and its surroundings.
- Threshold 4.1d:** Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area

4.1.4 REGULATORY REQUIREMENTS

- RR AES-1:** Proposed off-site improvements within the public right-of-way will comply with applicable standards in the City of Lancaster's *Design Guidelines* as they relate to streetscape design for sidewalks and parkways.

4.1.5 ENVIRONMENTAL IMPACT ANALYSIS

- Threshold 4.1a:** **Would the project have a substantial adverse effect on a scenic vista?**

Short-Term and Long-Term Impacts

The Project site is not located on a hillside or ridgeline, nor is it part of a designated scenic vista in any local planning documents applicable to adjacent areas either in the City of Lancaster or in the unincorporated County areas (i.e., Lancaster General Plan 2030 and the draft *Antelope Valley Area Plan*).

Scenic resources in the Lancaster area identified by the Lancaster General Plan include local views of surrounding buttes and Quartz Hill and long-distance views of the San Gabriel Mountains and desert expanses (Lancaster 2009a). The draft *Antelope Valley Area Plan* identifies scenic drives, water features, significant ridgelines, buttes, and Hillside Management Areas as scenic resources in the Antelope Valley. Priority Scenic Drives that are located approximately 3.0 miles west of the Project site include a segment of 90th Street West (from Avenue K to the northern County line) and a segment of West Avenue I (from 90th Street West to 120th Street West)

(LACDRP 2014). The Project site is located approximately 8.8 miles east of Little Buttes and approximately 3.8 miles north of Quartz Hill. Long-distance views of the Sierra Pelona Mountains are available to the south, and views of desert expanses are available to the north and southwest. The Project site is not visible from proposed Priority Scenic Drives in the draft *Antelope Valley Area Plan*.

The Conservation and Natural Resources Element of the Los Angeles County General Plan identifies the hillsides and ridgelines in the Antelope Valley west and southwest of the Project site as scenic resources. These hillsides and significant ridgelines are a part of the Hillside Management Area (HMA). HMAs are areas with a natural slope gradient of 25 percent or steeper, and are considered scenic resources in Los Angeles County. The nearest HMAs to the Project site are located within the communities of Leona Valley, Green Valley, Elizabeth Lake, and Lake Hughes, approximately five miles west and southwest of the Project site (LACDRP 2015).

As the MLWDC site is located near the edge of suburban development in the City of Lancaster on fully developed land surrounded on the northwest, southwest, south, and east by other developed institutional land uses, it is not part of the desert landscape. Buildings that would be altered by the Project as well as new buildings include one- and two-story structures within the limits of the existing MLDC, which would not be tall enough to intrude on scenic views of the distant mountains.

An approximately 180-foot high radio communications tower would be constructed outside of the flight path of the helipad and outside of the Historic District, discussed further in Section 4.4, Cultural Resources. The tower would consist of a three-legged lattice steel tower with tubular diagonal and horizontal bracing or cross bracing. The tower could be painted in bands of orange and white or may be unfinished/unpainted (gray color), depending on FAA requirements. The radio tower would be visible from various vantage points in the Project vicinity. However, it would not present a massive or visually prominent structure because the tower would have a thin profile with open web trusses and would taper at the top.

As previously discussed, the Project site has an institutional character due to the utilitarian nature of the facility, which is exemplified by the security fencing with barbed wire that separates various sections of the site, tall exterior flood lights, internal paved roadways and parking areas, security watch towers, and above-ground water tank. The water tank is approximately 130 feet tall, has a much more prominent profile due to its size, and would be in same viewshed as the radio tower. Existing views of scenic resources in the Antelope Valley would have a new visual component, but the tower would not substantially adversely affect a scenic view of distant mountains due to the context of the other development and structures in the area and the slim profile of the structure. Scenic resources would also not be altered, blocked or compromised by either short-term construction activities or long-term operations at the site. Impacts would be less than significant and no mitigation is required.

Threshold 4.1b: Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State scenic highway?

Short-Term and Long-Term Impacts

The Project site is developed with buildings that have an institutional character, with paved surface parking areas and ornamental landscaping at scattered locations. The Project site is relatively flat and has no rock outcroppings or other unique geologic features. There is no officially designated or eligible State scenic highway near the site (Caltrans 2011). The *City of Lancaster General Plan* does not establish any scenic corridors in the City (Lancaster 2009a). The

Conservation and Natural Resources Element of the Los Angeles County General Plan does not identify any scenic highways or corridors near the Project site (LACDRP 2015). The Los Angeles County's draft *Antelope Valley Area Plan* identifies Priority Scenic Drives in the area that include a segment of 90th Street West and a segment of West Avenue I. These Priority Scenic Drives are located approximately 3.0 miles west of the Project site (LACDRP 2014).

As discussed in Section 4.4, Cultural Resources, based on the findings of the Historical Resources Report located in Appendix C-1 of this EIR, there is a historic district adjacent to the Project site. The Polaris Flight Academy Historic District is eligible for listing in the National Register of Historic Places (NRHP) and the California Register of Historical Resources (CRHR) for its direct associations with military aviation during World War II and the work of Major Corliss Champion Moseley. This Historic District has 27 contributing buildings and structures and 8 non-contributing buildings and structures, as depicted on Exhibit 4.4-3, Historic District Contributors.

The Historical Resources Report determined that the impact of the Project on historical resources would be less than significant (GPA Consulting 2015). Changes to the Historic District would be limited to minor visual changes attributable to the creation of a parking lot and other minor trenching for subterranean utility installation within District boundaries. None of the District's contributing buildings or structures would be impacted. Because there are no designated Scenic Highways in the Project vicinity, the adjacent Historic District would not be significantly impacted by Project implementation. As there are no scenic resources that would be impacted by either short-term construction activities or long-term operations of the MLWDC, impacts would be less than significant and no mitigation is required.

Threshold 4.1c: Would the project substantially degrade the existing visual character or quality of the site and its surroundings?

Short-Term Construction Impacts

During construction of the MLWDC, views of construction activities would be generally obscured by existing structures. Existing structures near the Project site (e.g., security fencing, former Polaris War Field buildings, ISD warehouses, former HDHS MACC buildings, and water infrastructure and utilities), mature trees, and distance from the surrounding roadways obstruct views into the Project site, with the exception of the portion of the Project site adjacent to West Avenue I. Views into the Project site would be available predominately to travelers along West Avenue I, and from existing surrounding County-owned facilities.

Views of on-site construction would include activities and materials such as demolition and associated heavy equipment (e.g., backhoes, bulldozers, dump trucks), building construction activities and equipment, and stockpiles of building materials and equipment staging areas. There would be views of construction activities throughout the various stages of demolition, renovation, and new construction. In general, views of construction activities may be considered unappealing by some; however, construction and other forms of development are common sights and interruptions to the visual character of the site are largely accepted as a temporary inconvenience.

There are no other homes located adjacent to construction areas that would be impacted by temporary views of construction activities. All equipment staging areas and any stockpiles of materials would be kept on site and covered to prevent fugitive dust (see AQ RR-1 listed in Section 4.2, Air Quality). No significant impacts on the existing visual character or quality of the site due to construction activities would occur and no mitigation is required.

Long-Term Operational Impacts

Changes in the visual characteristics of the site would occur with the Project. As discussed in Section 3.0, Project Description, the Project would demolish some buildings; renovate and expand some buildings; and develop some new buildings and structures. The preliminary site plan is shown in Exhibit 3-1 in Section 3.0, Project Description. It is anticipated that the Project impact would be beneficial to the visual character of the site and surrounding area due to the demolition and/or renovation of older non-operational buildings and the construction of new structures built to current standards.

The overall design concept for the Project is to create a more normative, campus-style facility to maximize rehabilitative, educational, and vocational opportunities that, in turn, reduce recidivism and associated long-term detention costs. The intent of the conceptual architectural and site design are to provide a less institutional, more residential style open campus while providing necessary functionality. Buildings would be constructed in a similar scale and massing to the buildings that would remain on the site, and no new buildings would have more than two stories or be new prominent features in the skyline. The proposed radio communications tower would be visible from properties in the Project area, but would not substantially degrade the visual character of the site, which is institutional in design.

As stated in RR GHG-1 from Section 4.6, Greenhouse Gas Emissions, proposed new buildings that will be at least 10,000 square feet (sf) in size would be constructed in compliance with the applicable County Green Building requirements, including attainment of a Leadership in Energy and Environmental Design (LEED™) Silver rating or equivalent. As currently planned, this would include the Medical IPA (Building 52), Transitional Housing Buildings (Buildings G and H), and Food Services/Warehouse Building (Building 53). Considerations under LEED™ include reducing energy and water consumption; preventing air, storm water, and land pollution; and creating visual interest and a sense of place through building architecture, form, and character.

The Project improvements would be located within the existing and fully developed MLDC site using traditional building techniques and materials. On-site trees would be retained where possible; however, it is anticipated that, due to the soil preparation requirements for site construction, approximately 50 on-site trees would be removed, as would some landscaped and turf grass areas. Upon Project completion, the portions of the site that were disturbed by construction activities would be landscaped with low maintenance and low water trees, shrubs, and grasses in accordance with California Department of Corrections design guidelines (to ensure staff and inmate safety) and with County requirements for drought-tolerant plant species and water conservation.

Viewers on adjacent streets would be able to see the improved and new structures within the facility, but these improvements would not be located along the street frontages and would be obscured by distance, fencing, other buildings, and trees. Therefore, while the Project would change the existing visual character of the Project site, this change would not be considered a substantial degradation, and could be interpreted to be a beneficial change for the Project site and surrounding areas. As the long-term operational visual changes would be improvements to the existing structures, impacts would be less than significant and no mitigation is required.

Off-Site Impacts

Off-site infrastructure improvements would include trenching for the water line connection into West Avenue I, which would be at grade and underground and would not affect the visual character of the surrounding area. It is possible that other improvements could be required to areas outside of the County's property boundary and within the City's right-of-way (e.g.,

improvements to site ingress/egress driveways and associated curbs/aprons), which could require compliance with the City of Lancaster's *Design Guidelines* for streetscape design (see RR AES-1). If such off-site components would trigger compliance with the City's Design Guidelines, then the County would be required to coordinate with the City accordingly and ensure that any potential improvements met the City's standards. Impacts related to changes in visual quality would be less than significant and no mitigation is required.

Threshold 4.1d: Would the project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

Short-Term Construction Impacts

Construction activities and schedules would be coordinated with County regulations and are expected to begin in the last quarter of 2016 (November 2016) and be completed by the third quarter of 2019 (September 2019), totaling approximately 35 months. Construction would occur within allowable hours as designated by the County Noise Ordinance, with no Sunday or holiday construction work. Lighting during the construction phase would be similar to the security lighting at the existing parking lots and exterior areas of the surrounding public facilities. As no nighttime (from 7 PM to 7 AM) construction would occur that would require high-intensity lighting, construction activities would not be considered a source of substantial light and glare. Therefore, this impact would be less than significant and no mitigation is required.

Long-Term Operational Impacts

The Project site currently has security lights, exterior building lights, and parking lot lights that are operational, although they are not fully used due to the interim relative dormancy of operations at the Project site. The Project site is surrounded by County- and State-owned facilities that also have nighttime and security lighting.

All new buildings and new structures at the MLWDC would be constructed in compliance with applicable requirements from the California Building Code (CBC – Title 24 of the California Code of Regulations) and the National Fire Protection Code (NFPA). The primary objective of exterior lighting would be to illuminate entrances and to provide adequate site lighting for security and wayfinding purposes. During operations, the Project would introduce new interior and exterior lighting into the approximate 46-acre site. The Project would have parking lot light poles; walkway and wayfinding lighting; gate and guard tower lights and spotlights; and security lights. The proposed communications tower could also have a red light on each tower leg at about 75 feet above ground level and 2 flashing red lights or omni-directional beacons on top.

Exterior lights at the Project site would include existing and new sources light that would increase nighttime lighting levels in the immediate vicinity of the Project site. There would be a perceived increase in on-site lighting as seen by adjacent land uses due to the property's return to an active detention center.

The 2014 Scope of Construction document prepared by DLR Group for the MLWDC (Design Criteria Document) sets forth a design narrative for the conceptual approach for determining the scope of construction for the Project. As described in the Design Criteria Document, interior lighting would be energy efficient and would incorporate maximum daylighting in interior spaces to reduce the hours of artificial lighting. For interior lighting, the minimum maintained lighting level measured in the horizontal plane 30 inches above finished floor would range from 10 to 50 footcandles (i.e., 0.85 to 4.25 watts per square meter [W/m^2]), depending on the use, with emergency egress and exit lighting at no less than 1 footcandle of illumination (a measure of illuminance equivalent to the illumination produced by a source of one candle at a distance of one

foot and equal to one lumen incident per square foot) at the floor level of emergency paths, offices, and electrical equipment rooms (DLR 2014).

Exterior lighting fixtures would be controlled by a Master Time Clock. Exterior lighting would be weatherproof and energy efficient, and building-mounted lighting would utilize pulse start metal halide or light-emitting diode (LED) cut-off-type luminaires. Exterior minimum lighting levels that must be consistently maintained at ground level would range from 1 footcandle in the parking lots; 2 footcandles within secured perimeter areas; and 5 footcandles (i.e. 0.43 W/m²) around the perimeter fencing, the main gate house, and vehicle sally ports (DLR 2014).

Exterior security lighting and parking lot lighting, which would be illuminated at a level of up to 5 footcandles (i.e. 0.43 W/m²) would be visible from the apartment property (i.e., the nearest sensitive receptor) to the west of the site (DLR 2014). However, these residences do not face the site and are located approximately 450 feet from the closest corner of the nearest proposed parking lot. Parking lot lighting would face downward, and the distance between the parking lot lighting and the apartments would be too great to result in substantial lighting spill over onto the residential property. Additionally, there are intervening trees and structures on the site that would obscure views of the parking lot from the apartments to the west of the site. Other adjacent land uses (e.g., solar energy facility, unoccupied HDHS MACC, Lancaster Animal Shelter, CMYC, and the CSP-LAC) are located at least 1,000 feet away from the site, at which lighting levels at the site would not result in adverse impacts to their users.

Security lighting along the site boundaries would be a minimum of 5 footcandles around the perimeter fencing, the main gate house, and vehicle sally ports (DLR 2014). Additionally, security lighting would be located on the surveillance towers. The nearest proposed perimeter fencing is approximately 400 feet southeast of the apartment property (i.e., the nearest sensitive receptor) to the west of the site, with the only intervening structures being the elevated water tank and landscaping.

Because the Project is being developed through the Design/Build process, no lighting plan has been developed. Although the County has adopted rural outdoor lighting standards (Chapter 22.44, Part 9 of the County Code) that are intended to reduce light pollution and preserve the nighttime environment, public facilities that are used for incarceration are exempt from the regulations if the lighting is needed for security and operation of the facility. Neither the County of Los Angeles nor the City of Lancaster has quantifications for the maximum amount of lighting that can trespass onto a residential property. As such, in order to ensure that lighting levels do not significantly impact nearby residential properties, MM AES-1 is required.

As stated in MM AES-1, a Lighting Plan shall be prepared that depicts the locations of lighting fixtures, types of fixtures, mounting heights, and aiming directions to be installed on the Project site. The Lighting Plan shall ensure that sensitive receptors on adjacent properties would not be significantly adversely affected by light spillover, while also ensuring that lighting levels meet the security requirements for the MLWDC. The Lighting Plan shall be provided to the Los Angeles County Director of Public Works (DPW) to confirm its findings prior to the commencement of any on-site or off-site demolition/construction activities.

Implementation of MM AES-1 would ensure that impacts related to the potential for substantial light that could adversely affect day or nighttime views in the area would be less than significant after mitigation.

In addition to light sources, glare can be caused by light reflections from pavement, vehicles, and building materials such as reflective glass and polished surfaces. During daylight hours, the amount of glare depends on intensity and direction of sunlight. Glare can create hazards to

motorists and nuisances for pedestrians and other viewers. Exterior building materials for the Project would include concrete, solid grouted concrete masonry units, metal roofs, steel frames and trims, and other traditional building materials used for institutional structures. No mirrored surfaces or large areas covered with glazing materials are proposed by the Project that could create glare impacts on adjacent land uses.

Vehicles exiting the site to 60th Street West after dark could generate light and glare impacts on nearby residences. However, visitors would be limited during the nighttime hours and thus, only staff and limited visitor's vehicles would be using the parking lots during the evenings. The driveway that provides ingress/egress to 60th Street West is an existing condition and not a new source of traffic; however, traffic would be increased with Project implementation. Currently, existing 4- to 5-foot-tall shrubbery and a mature tree are located within the apartment property at the general angle of headlights as right-hand turns are made onto 60th Street West. The existing landscaping would obscure headlamp lighting from egress traffic. Impacts related to glare would be less than significant and no mitigation would be required.

4.1.6 CUMULATIVE IMPACTS

The Project would lead to minor visual changes in the western section of the City of Lancaster. The cumulative projects and future development in this area (as identified in Section 2.4, Cumulative Projects, of this EIR) that are considered to be relevant and within the general viewshed of the Project are on 60th Street West near West Avenue J (about 1.0 mile south of the site) and other cumulative projects are planned on West Avenue I near 40th Street West (about two miles east of the site). A few others are planned between 40th Street West and 50th Street West. Although the former HDHS MACC is currently vacant and may be reused or redeveloped in the future, there are no existing or proposed plans for this facility. Thus, it is assumed to remain vacant and unused for the foreseeable future, and no other substantive developments are anticipated within the County-owned portion or State-owned portion of the block.

Although Project implementation would alter the visual aesthetic of the site, changes to the Project site would be minimally visible from nearby land uses. Views into the MLWDC would be obscured by fencing, buildings, distance from public viewpoints, and mature trees, and the changes to the MLWDC may be considered to be an aesthetic improvement due to the renovation/demolition of older buildings and proposed site improvements. Although new developments and site improvements would occur in the Project area, which would change the visual character to a more developed and suburban environment, these nearby cumulative projects may not necessarily create adverse impacts to the visual character of the area. Growth and development in the City's urbanizing area as described in the City's General Plan, which includes the Project site, would not necessarily result in a substantial degradation of the visual character of the area (Lancaster 2009a).

Compliance with the City's Design Guidelines requires that the visual quality (including site design, building architecture, form and character, and streetscape design) of cumulative projects proposed in the City of Lancaster is consistent with the design preferences of the City, resulting in beneficial impacts to visual character. While the Project need not comply with these guidelines, the sizes of the Project's proposed buildings and improvements and their location within the developed site would limit their contribution to the cumulative visual changes in the area. Cumulative impacts to the visual quality of the area would not be cumulatively considerable.

Existing sources of light and glare in the City and surrounding area generate ambient lighting levels that define nighttime light intensities. With the proposed Project and cumulative projects, lighting levels would increase. However, all future developments in the City of Lancaster would be required to address the potential for light spillover and glare through compliance with the City's

Design Guidelines and CEQA. Project compliance with MM AES-1, which addresses site-specific lighting and glare, in addition to cumulative project compliance with the City's Design Guidelines would ensure that cumulative impacts would not be cumulatively considerable.

4.1.7 MITIGATION MEASURE

MM AES-1 A Lighting Plan shall be prepared that depicts the locations of lighting fixtures, types of fixtures, mounting heights, and aiming directions to be installed on the Project site. The Lighting Plan shall ensure that sensitive receptors on adjacent properties would not be significantly adversely affected by light spillover, while also ensuring that lighting levels meet the security requirements for the MLWDC. The Lighting Plan shall be provided to the Los Angeles County Director of Public Works (DPW) to confirm its findings prior to the commencement of any on-site or off-site demolition/construction activities. Upon approval of the Lighting Plan by DPW, the Project shall be implemented in compliance with the Plan.

4.1.8 LEVEL OF SIGNIFICANCE AFTER MITIGATION

All impacts related to scenic vistas, scenic resources, visual character, and glare would be less than significant. With implementation of MM AES-1, lighting impacts would be less than significant after mitigation.

4.1.9 REFERENCES

California Department of Transportation (Caltrans). 2011 (September 7, last updated). California Scenic Highway Mapping System (Los Angeles County). Sacramento, CA: Caltrans. http://www.dot.ca.gov/hq/LandArch/scenic_highways/index.htm.

DLR Group. 2014 (September 30). Mira Loma Women's Detention Center Design Criteria Document, Scope of Construction. Pasadena, CA: DLR Group.

GPA Consulting. 2014 (December). *Mira Loma Detention Center Women's Facility Project, Lancaster, California, Historical Resource Report*. El Segundo, CA: GPA Consulting (Appendix C-1).

Lancaster, City of. 2015 (January 13, last updated). *Lancaster, California – Code of Ordinances*. Tallahassee, FL: the City. https://www.municode.com/library/ca/lancaster/codes/code_of_ordinances.

———. 2014 (August 14). Architectural and Design Commission. Lancaster, CA: the City. <http://www.cityoflancasterca.org/Index.aspx?page=668>.

———. 2009a (July 14, adopted). *General Plan 2030: City of Lancaster*. Lancaster, CA: the City. <http://www.cityoflancasterca.org/Index.aspx?page=427>.

———. 2009b (December 8, as updated in 2010). *Design Guidelines*. Lancaster, CA: the City. <http://www.cityoflancasterca.org/Index.aspx?page=728>.

Los Angeles County Department of Regional Planning (LACDRP). 2015 (March). Los Angeles County General Plan, Revised Draft. Los Angeles, CA: LACDRP. http://planning.lacounty.gov/assets/upl/project/gp_draft-march2015.pdf

- . 2014 (November 3, updated). *Draft Antelope Valley Area Plan: Town & Country*. Los Angeles, CA: LACDRP. <http://planning.lacounty.gov/tnc/documents/>.
- . 2010 (February). *County of Los Angeles Green Building Technical Manual*. Los Angeles, CA: LACDRP. http://planning.lacounty.gov/assets/upl/project/green_buildings-technical-manual-feb2010.pdf.
- . 2009. General Plan Update Program – Interactive Map (GP-NET). Los Angeles, CA: LACDRP. <http://planning.lacounty.gov/generalplan/maps>.
- Los Angeles, County of. 2014. *Los Angeles, California, Code of Ordinances*. Tallahassee, FL: Municipal Code Corporation for the County. <https://library.municode.com/index.aspx?clientId=16274>.
- Nadela, Carl. 2014 (December 4). Personal Communication. Telephone conversation between Carl Nadela (Senior Regional Planner at the County of Los Angeles Department of Regional Planning) and Daria Sarraf (Environmental Planner at BonTerra Psomas).

This page intentionally left blank

4.2 AIR QUALITY

This section addresses potential short-term (construction-related) and long-term (operational) air quality impacts that would result from implementing the Project. The air quality impact analysis includes a discussion of existing air quality, including monitored criteria pollutants and attainment designations and potential air quality impacts that would occur with construction and operation of the Project. The Project's estimated construction and operational air emissions were calculated by using the California Emissions Estimator Model (CalEEMod, Version 2013.2.2); the inputs and data for the Project are included in Appendix B.

This analysis also addresses the impacts of the San Joaquin Fever (Coccidioidomycosis), or "Valley Fever," which is not a criteria air pollutant, but a disease that can result from inhalation of airborne particulates when they carry fungal spores of the disease.

4.2.1 RELEVANT POLICIES AND REGULATIONS

Federal

U.S. Environmental Protection Agency (USEPA)

The USEPA's air quality mandates are drawn primarily from the Clean Air Act (CAA), which was enacted in 1970. The most recent major amendments made by Congress were in 1990. As part of its enforcement responsibilities, the USEPA requires each State with federal nonattainment areas to prepare and submit a State Implementation Plan (SIP) that demonstrates the means to attain and maintain the federal standards. The SIP must integrate federal, State, and local plan components and regulations to identify specific measures to reduce pollution by using a combination of performance standards and market-based programs within the SIP-identified timeframe. The USEPA is also responsible for setting and enforcing the National Ambient Air Quality Standards (NAAQS) for criteria pollutants, which are discussed further below under Section 4.2.3, Existing Conditions. Table 4.2-1, California and National Ambient Air Quality Standards, provides additional information.

State

California Air Resources Board (CARB)

The CARB, a part of the California Environmental Protection Agency (CalEPA), is responsible for coordinating and administering both the federal and State air pollution control programs in California. In this capacity, CARB conducts research; sets the California Ambient Air Quality Standards (CAAQS), as shown in Table 4.2-1; compiles emission inventories; develops suggested control measures; oversees local programs; and prepares the SIP. For regions that do not attain the CAAQS, CARB requires the air districts to prepare plans for attaining the standards. These plans are then integrated into the State SIP. CARB establishes emissions standards for (1) motor vehicles sold in California; (2) consumer products (e.g., hair spray, aerosol paints, and barbecue lighter fluid); and (3) various types of commercial equipment. It also sets fuel specifications to further reduce vehicular emissions.

**TABLE 4.2-1
CALIFORNIA AND NATIONAL AMBIENT AIR QUALITY STANDARDS**

Pollutant	Averaging Time	California Standards	Federal Standards	
			Primary ^a	Secondary ^b
O ₃	1 Hour	0.09 ppm (180 µg/m ³)	–	–
	8 Hour	0.070 ppm (137 µg/m ³)	0.070 ppm (137 µg/m ³)	Same as Primary
PM10	24 Hour	50 µg/m ³	150 µg/m ³	Same as Primary
	AAM	20 µg/m ³	–	Same as Primary
PM2.5	24 Hour	–	35 µg/m ³	Same as Primary
	AAM	12 µg/m ³	12.0 µg/m ³	15.0 µg/m ³
CO	1 Hour	20 ppm (23 mg/m ³)	35 ppm (40 mg/m ³)	–
	8 Hour	9.0 ppm (10 mg/m ³)	9 ppm (10 mg/m ³)	–
	8 Hour (Lake Tahoe)	6 ppm (7 mg/m ³)	–	–
NO ₂	AAM	0.030 ppm (57 µg/m ³)	0.053 ppm (100 µg/m ³)	Same as Primary
	1 Hour	0.18 ppm (339 µg/m ³)	0.100 ppm (188 µg/m ³)	–
SO ₂	24 Hour	0.04 ppm (105 µg/m ³)	–	–
	3 Hour	–	–	0.5 ppm (1,300 µg/m ³)
	1 Hour	0.25 ppm (655 µg/m ³)	0.075 ppm (196 µg/m ³)	–
Lead	30-day Avg.	1.5 µg/m ³	–	–
	Calendar Quarter	–	1.5 µg/m ³	Same as Primary
	Rolling 3-month Avg.	–	0.15 µg/m ³	
Visibility Reducing Particles	8 hour	Extinction coefficient of 0.23 per km – visibility ≥ 10 miles (0.07 per km – ≥30 miles for Lake Tahoe)	No Federal Standards	
Sulfates	24 Hour	25 µg/m ³		
Hydrogen Sulfide	1 Hour	0.03 ppm (42 µg/m ³)		
Vinyl Chloride	24 Hour	0.01 ppm (26 µg/m ³)		

O₃: ozone; ppm: parts per million; µg/m³: micrograms per cubic meter; PM10: respirable particulate matter; AAM: Annual Arithmetic Mean; –: No Standard; PM2.5: fine particulate matter; CO: carbon monoxide; mg/m³: milligrams per cubic meter; NO₂: nitrogen dioxide; SO₂: sulfur dioxide; km: kilometer.

^a *National Primary Standards*: The levels of air quality necessary, within an adequate margin of safety, to protect the public health.

^b *National Secondary Standards*: The levels of air quality necessary to protect the public welfare from any known or anticipated adverse effects of a pollutant.

Note: More detailed information in the data presented in this table can be found at the CARB website (www.arb.ca.gov).

Source: CARB 2015b

Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling

California Code of Regulations, Title 13, Section 2485 (13 CCR §2485) places restrictions on vehicular idling. It requires that on or after January 1, 2015, any person that owns, operates, or causes to operate any diesel-fueled commercial motor vehicle must prohibit vehicle idling for more than 5 consecutive minutes at any location. Additionally, diesel-fueled internal combustion engine auxiliary power systems (APS) must be prohibited from operating for greater than 5 minutes at any location when within 100 feet of any property zoned for individual or multifamily housing units,

schools, hotels, motels, hospitals, senior care facilities or child care facilities. As an alternative to idling the primary engine, diesel-fueled engines/vehicles may, as an option, be equipped with alternative technologies.

Regional

Antelope Valley Air Quality Management District (AVAQMD)

The Project site lies within the boundaries of the AVAQMD. The AVAQMD is bound by the Kern County/Los Angeles County border to the north, the Los Angeles County/San Bernardino County border to the east, and the South Coast Air Quality Management District (SCAQMD) border to the south and southwest. The Project site, under AVAQMD jurisdiction, lies within the Mojave Desert Air Basin (MDAB).

The AVAQMD is responsible for administering permits related to point sources, including diesel generators larger than 50 horsepower (hp). Internal combustion engines smaller than 50 hp are exempt from the AVAQMD's permitting requirements (AVAQMD Rule 219, Equipment Not Requiring a Permit). AVAQMD Rule 201, Permit to Construct, and Rule 203, Permit to Operate, set forth the permits required to construct or operate any equipment that may cause emissions of air contaminants. The USEPA designated the Western Mojave Desert as a non-attainment area for 8-hour O₃ NAAQS pursuant to the provisions of the Federal Clean Air Act (FCAA). The AVAQMD is included in the Western Mojave Desert non-attainment area. The 2008 AVAQMD Federal 8-hour O₃ attainment plan sets forth requirements to meet federal regulations for 8-hour O₃ by June 2021 (AVAQMD 2008).

County

Green Building Standards Code (Title 31)

As described in Section 3.3.3 of this EIR, California Buildings Standards Code (CCR Title 24) includes Part 11, known as the California Green Building Standards Code (i.e., CALGreen Code). In November 2013, the County of Los Angeles Board of Supervisors adopted the CALGreen Code by reference as the Los Angeles County Green Building Standards Code (Title 31). The purpose of this Code is to improve public health, safety, and general welfare by enhancing the design and construction of buildings through the use of building concepts having a reduced negative impact or positive environmental impact and encouraging sustainable construction practices in energy efficiency and environmental air quality. Additional information about the Green Building Standards Code is included in Section 4.6, Greenhouse Gas Emissions.

Department of Health -Infection Control Policy Guidelines Procedure No.918.01.

To prevent the spread of diseases, which may be caused by construction induced airborne pollution in susceptible individuals (patients, staff and the public) in County of Los Angeles Department of Health Services (DHS) facilities requires that building additions, demolition, retrofit, alterations, new construction comply with the Infection Control Policy. This Policy includes infection control measures to contain dust, debris, etc. and protect the patients, employees and visitors in the project environment.

4.2.2 EXISTING CONDITIONS

Climate and Meteorology

The Project site is located in the western portion of the MDAB. The MDAB is classified as a dry-hot desert climate. During the summer, the MDAB is generally influenced by a Pacific Subtropical High cell that sits off the coast, inhibiting cloud formation and encouraging daytime solar heating. The MDAB averages between three and seven inches of precipitation per year. The MDAB is separated from the Southern California coastal and Central California valley regions by the San Gabriel Mountains in the south and the Tehachapi Mountains in the northwest (AVAQMD 2011).

The annual average maximum temperature measured at the Lancaster Flight Service Station (FSS) Climatic Station from 1974 through 2013 was 75.9 degrees Fahrenheit (°F). The highest monthly average maximum temperature (96.5°F) occurs in July and the lowest monthly average minimum temperature (29.1°F) occurs in December. The average annual precipitation during the same period was 7.38 inches with an annual average snowfall of 3.4 inches (WRCC 2013). The prevailing wind direction is west with an average wind speed of 11.2 miles per hour (WRCC 2015a, 2015b).

Criteria Air Pollutants

Concentrations of the following air pollutants are used as indicators of ambient air quality conditions: nitrogen dioxide (NO₂); ozone (O₃); particulate matter, including both respirable particulate matter equal to or less than 10 microns in diameter¹ (PM₁₀) and fine particulate matter equal to or less than 2.5 microns in diameter (PM_{2.5}); carbon monoxide (CO); sulfur dioxide (SO₂); and lead. These air pollutants are commonly referred to as “criteria air pollutants” because they are the principal air pollutants identified by the USEPA as being harmful to human health. A description of each criteria air pollutant, including source types and health effects, is provided below.

Nitrogen Dioxide

Nitrogen Dioxide (NO₂) is a brownish, highly reactive gas that is present in all urban environments. NO₂, nitric oxide (NO), and nitrous oxide (N₂O) are constituents of oxides of nitrogen (NO_x). Motor vehicle emissions are the main source of NO_x in urban areas. NO₂ is toxic to various animals and to humans because of its ability to combine with water in the eyes, lungs, mucus membranes, and skin to form nitric acid. Laboratory studies show that susceptible humans (such as asthmatics) who are exposed to high concentrations of NO₂ can suffer lung irritation and, potentially, lung damage. Epidemiological studies have also shown associations among NO₂ concentrations and (1) mortality from respiratory and cardiovascular causes and (2) hospital admissions for respiratory conditions.

Ozone

Ozone (O₃) is a secondary pollutant (i.e., it is not directly emitted) and is a gas that is formed when volatile organic compounds (VOCs) (also referred to as reactive organic gases or ROGs) and NO_x undergo a photochemical reaction that occurs in the presence of sunlight. Thus, VOC and NO_x are O₃ precursors. The primary sources of VOC emissions are gasoline-fueled motor vehicles and solvent evaporation from consumer products. Sunlight and hot weather cause ground-level O₃ to form; as a result, low wind speeds or stagnant air combined with warm temperatures and clear skies provide the optimum conditions for O₃ formation. As a result, O₃ is

¹ About 1/7 of the diameter of a single human hair.

known as a summertime air pollutant.² Ground-level O₃ is the primary constituent of smog. Because O₃ formation occurs over extended periods of time, both O₃ and its precursors are transported by wind, and high O₃ concentrations can occur in areas well away from sources of its constituent pollutants. People with lung disease, children, older adults, and persons who spend more time outdoors participating in vigorous physical activities are at greater risk from the harmful health effects of O₃ exposure.

Particulate Matter

Particulate matter (PM) includes both aerosols and solid particles of a wide range of size and composition. Of particular concern are respirable PM particles smaller than or equal to 10 microns in diameter (PM₁₀) and fine PM particles smaller than or equal to 2.5 microns in diameter (PM_{2.5}). Small particles are of greater concern because they can penetrate deeper into the lungs than larger particles.

PM₁₀ is generally emitted directly as a result of mechanical processes that crush or grind larger particles (most typically through construction activities and vehicular travel); these emissions are known as fugitive dust.³ Fugitive dust is also generated during moderate to high wind episodes. The principal sources of dust in urban areas include grading, construction, disturbed areas of soil, and dust entrained by vehicles on roadways. PM₁₀ generally settles out of the atmosphere rapidly and is not readily transported over large distances.

PM_{2.5}, as well as being a result of the PM₁₀ sources described above, is directly emitted in combustion exhaust from diesel engines in trucks, construction equipment, and trains. Unlike PM₁₀, PM_{2.5} can remain suspended in the atmosphere for days and/or weeks and can be transported long distances by wind. The principal health effect of airborne particulate matter (i.e., PM₁₀ and PM_{2.5}) is on the respiratory system. People with influenza, chronic respiratory and cardiovascular diseases, and the elderly may suffer worse illnesses and premature death, and people with bronchitis can expect aggravated symptoms from breathing in fine particles. Children may experience a decline in lung function due to inhaling PM₁₀ and PM_{2.5}. Other groups considered sensitive include smokers and people who cannot breathe well through their noses. Exercising athletes are also considered sensitive because many breathe through their mouths.

Carbon Monoxide

Carbon monoxide (CO) is a colorless and odorless gas which, in the urban environment, is associated primarily with the incomplete combustion of fossil fuels in motor vehicles. CO combines with hemoglobin in the bloodstream and reduces the amount of oxygen that can be circulated through the body. High CO concentrations can cause headaches; can aggravate cardiovascular disease; and can impair central nervous system functions. CO concentrations can vary greatly over comparatively short distances. Relatively high concentrations are typically found near crowded intersections; along heavily used roadways carrying slow-moving traffic; and at or near ground level.

Sulfur Dioxide

The primary source of sulfur dioxide (SO₂) emissions is fossil fuel combustion for generating electric power and combustion of motor fuels. However, stricter standards have removed most of the sulfur from fuels, greatly reducing sulfur oxide (SO_x) emissions from vehicles. SO₂ combines

² Ground-level O₃ is not to be confused with atmospheric O₃ or the "ozone layer", which occurs very high in the atmosphere and shields the planet from some ultraviolet rays.

³ In an air pollution discussion, "fugitive" describes sources that are not confined to specific emission points such as power plant stacks or vehicle exhaust pipes.

easily with water vapor, forming aerosols of sulfurous acid, a colorless, mildly corrosive liquid. This liquid may then combine with oxygen in the air, forming the even more irritating and corrosive sulfuric acid (H₂SO₄). SO₂ can cause temporary breathing difficulty for children, the elderly, and persons with asthma, especially asthmatics who are active outdoors. Longer-term exposures to high levels of SO₂ gas and particles cause respiratory illness and aggravate existing heart disease.

Lead

Lead is a metal found naturally in the environment and in manufactured products. The major sources of lead emissions have historically been mobile and industrial sources. Lead is a stable compound that persists and accumulates both in the environment and in animals. In humans, it affects the body's blood-forming, nervous, and renal systems. In addition, lead has been shown to affect the normal functions of the reproductive, endocrine, hepatic, cardiovascular, immunological and gastrointestinal systems, although there is significant individual variability in response to lead exposure.

Toxic Air Contaminants

Toxic air contaminants (TACs) are a diverse group of air pollutants that may cause or contribute to an increase in deaths and serious illness or that may pose an existing or potential hazard to human health. TACs include both organic and inorganic chemical substances emitted from a variety of common sources, including motor vehicles, industrial operations, gasoline stations, dry cleaners, painting operations, and research and teaching facilities. TACs are different than the "criteria" pollutants previously discussed in that ambient air quality standards have not been established for them. TACs occurring at extremely low levels may still cause health effects, and it is typically difficult to identify levels of exposure that do not produce adverse health effects. Diesel engine emissions (known as diesel particulate matter or diesel PM) are responsible for the majority of California's known cancer risk from outdoor air pollutants. In addition, diesel soot causes visibility reduction and is a potent global warmer.

Air Quality Data for Criteria Air Pollutants

Air quality at any site is dependent upon regional air quality and local pollutant sources. Regional air quality is determined by the amount and type of pollutants released throughout the air basin.

Air quality data representative of the Project area is collected at the Lancaster-Division Street Monitoring Station, which is the closest monitoring station to the Project site. It is located on 43301 Division Street, Lancaster, California 93535, 6.3 miles southeast of the Project site. Pollutants measured at the Lancaster-Division Street Monitoring Station include O₃, CO, PM₁₀, PM_{2.5}, and NO_x. The monitoring data presented in Table 4.2-2, Air Quality Levels Measured at the Lancaster-Division Street Monitoring Station, were obtained from CARB (CARB 2015). Federal and State air quality standards are also presented.

**TABLE 4.2-2
AIR QUALITY LEVELS MEASURED AT THE LANCASTER
MONITORING STATION**

Pollutant	California Standard	National Standard	Year	Max. Level ^a	Days State Standard Exceeded ^b	Days National Standard Exceeded ^{b, c}
O ₃ (1 hour)	0.09 ppm	None	2014	0.101	3	0
			2013	0.108	9	0
			2012	0.112	13	0
O ₃ (8 hour)	0.070 ppm	0.075 ppm	2014	0.088	36	17
			2013	0.094	53	34
			2012	0.096	72	39
PM10 (24 hour)	50 µg/m ³	150 µg/m ³	2014	–	–/–	0/0
			2013	173.4	2/–	1/6.5
			2012	43.0	0/0	0/0
PM10 (AAM)	20 µg/m ³	None	2014	–	–	–
			2013	–	–	–
			2012	18.5	No	–
NO ₂ (1 Hour)	0.18 ppm	None	2014	0.051	0	0
			2013	0.047	0	0
			2012	0.049	0	0
NO ₂ (AAM)	0.030 ppm	0.053 ppm	2014	0.008	No	No
			2013	0.008	No	No
			2012	0.009	No	No
CO (8 hour)	9.0 ppm	9.0 ppm	2014	–	0	0
			2013	–	0	0
			2012	1.0	0	0
PM2.5 (24 Hour)	None	35 µg/m ³	2014	42.0	N/A	1/6.9
			2013	11.9	N/A	0/0
			2012	14.0	N/A	0/–
PM2.5 (AAM)	12 µg/m ³	15 µg/m ³	2014	–	–	–
			2013	–	–	–
			2012	–	–	–

–: Data Not Reported or insufficient data available to determine the value. N/A indicates that there is no applicable standard.

^a California maximum levels were used.

^b For annual averaging times, a “Yes” or “No” response is given if the annual average concentration exceeded the applicable standard.

^c PM is measured once every 6 days. Where two values are shown for PM10 and PM2.5, the first is for the measured value and the second is the estimated value if monitored every day.

Source: CARB 2015.

The Lancaster monitoring data show that O₃ is the air pollutant of primary concern in the Project area. At the Lancaster-Division Street Station, the State 1-hour O₃ standard was exceeded 13 days in 2012, 9 days in 2013, and 3 days in 2014. The State 8-hour O₃ standard was exceeded 72 days in 2012, 53 days in 2013, and 36 days in 2014. The federal O₃ 8-hour standard was exceeded 39 days in 2012, 34 days in 2013, and 17 days in 2014. O₃ is a secondary pollutant and is not directly emitted from a source; it occurs as the result of chemical reactions between other pollutants, most importantly VOCs and NO₂, which occur only in the presence of bright sunlight. Pollutants emitted

from upwind cities react during transport downwind to produce the oxidant concentrations experienced in the area. Because NO₂ is a primary constituent of O₃, the very low measured concentrations of NO₂ indicate that existing high O₃ levels are primarily the result of transport of O₃ that is formed outside the Antelope Valley.

Particulate matter (PM10 and PM2.5) is another air pollutant of concern in the area. The State 24-hour PM10 standard was exceeded for 2 days in 2013 at the Lancaster-Division Street Monitoring Station. The federal 24-hour PM10 standard was exceeded at the Lancaster-Division Street Monitoring Station for 1 day in 2013. The federal 24-hour PM2.5 standard was exceeded for 1 day in 2014. No other PM10 or PM2.5 standards were exceeded from 2012 to 2014. Particulate levels in the area are due to natural sources (such as wind), grading operations, and motor vehicles.

Regional air quality is defined by whether the area has attained or not attained State and federal standards, as determined by monitoring. Areas that are in nonattainment are required to prepare plans and implement measures that will bring the region into attainment. When an area has been reclassified from nonattainment to attainment for a federal standard, the status is identified as "maintenance", and there must be a plan and measures established that will keep the region in attainment for the following ten years. Table 4.2-3 below lists the current attainment designations for the MDAB.

**TABLE 4.2-3
DESIGNATIONS OF CRITERIA POLLUTANTS IN THE ANTELOPE VALLEY
PORTION OF THE MOJAVE DESERT AIR BASIN**

Pollutant	Attainment Status	
	State	Federal
O ₃ (1 hour)	Nonattainment; classified Extreme	No standard
O ₃ (8 hour)		Nonattainment; classified Severe-15
PM10	Nonattainment	Unclassified
PM2.5	Unclassified	Unclassified/Attainment
CO	Attainment	Unclassified/Attainment
NO ₂	Attainment	Unclassified/Attainment
SO ₂	Attainment	Unclassified
Lead	Attainment	Unclassified/Attainment
Particulate Sulfate	Unclassified	No federal standard
Hydrogen Sulfide	Unclassified	
Visibility Reducing Particles	Unclassified	

O₃: ozone; PM10: respirable particulate matter with a diameter of 10 microns or less in diameter; PM2.5: fine particulate matter with a diameter of 2.5 microns or less in diameter; CO: carbon monoxide; NO₂: nitrogen dioxide; SO₂: sulfur dioxide.
Source: AVAQMD 2015; USEPA 2015.

The USEPA designates an area as "Unclassified" if, based on available information, it cannot be classified as either meeting or not meeting the national primary or secondary ambient air quality standard for the pollutant. For CARB, an "Unclassified" designation indicates that the air quality data for the area are incomplete and do not support a designation of attainment or nonattainment. As noted in Table 4.2-3, many of the criteria pollutants have been designated as Unclassified: PM10, PM2.5, SO₂, lead, Particulate Sulfate, Hydrogen Sulfide, and visibility reducing particles,

Table 4.2-3 also shows that the USEPA has designated the AVAQMD portion of MDAB as being in Severe-15 Nonattainment for ambient O₃ concentrations. Pursuant to the approved 2008 Federal Ozone Attainment Plan and given the Severe-15 Nonattainment designation, the AVAQMD has 15 years from the 2004 plan approval (year 2019) to achieve attainment. To be designated as an Attainment area by the State, the AVAQMD portion of the MDAB will need to achieve both the 1-hour and 8-hour O₃ standards.

In 2007, the USEPA revoked the annual PM₁₀ standard as research had indicated that there were no considerable health effects associated with long-term exposure to PM₁₀. With this change, the basin is technically in attainment of the federal PM₁₀ standards, although the re-designation process has not yet begun. The USEPA has designated the AVAQMD portion of the MDAB as being an Unclassified area for PM₁₀. The State has designated the AVAQMD portion of the MDAB as being in nonattainment for the State PM₁₀ standard.

Valley Fever

San Joaquin Fever (also known as Valley Fever; formally known as *Coccidioidomycosis*) is the common name for a fungal disease caused by inhalation of *Coccidioides immitis* spores that are carried in dust (LADPH 2015). It is found in parts of the southwestern United States, Mexico, and South and Central America, where soil and climactic conditions are conducive to the presence of the Valley Fever fungus (CDHS 2014). In California, average annual incidence rates from 2009 through 2012 were highest in Kern County (205.1 per 100,000), Kings County (191.7 per 100,000), Fresno County (64.5 per 100,000), San Luis Obispo County (47.2 per 100,000), Tulare County (39.2 per 100,000) and Madera County (20.7 per 100,000) counties. In California, annual rates of coccidioidomycosis increased by 67.7 percent from 2009 to 2012, with the highest annual incidence rate in 2011 with 13.9 per 100,000 population (CDPH 2014).

The fungus can become airborne when soil that contains *C. immitis* spores is disturbed, either by natural or man-made means, including wind, natural disaster (earthquakes, fires, landslides), farming, and grading. Valley Fever is diagnosed by an antibody blood test or culture and is treatable with a variety of oral and injectable anti-fungal agents. The majority of people (approximately 60 percent) exposed to Valley Fever spores develop no symptoms (CDPH 2012). If symptoms develop, individuals generally develop a mild respiratory illness with flu-like symptoms that can last about a month. A small proportion of infected individuals develop more severe symptoms that spread outside the lungs to the bone, brain, and/or skin; this is known as "disseminated Valley Fever".

At highest risk for exposure to Valley Fever are farmers, construction workers, military personnel, archaeologists, and others who are likely to engage in activities that actively disturb soils in areas where Valley Fever may be present (CDHS 2014). Persons at the highest risk of developing disseminated Valley Fever include the very young (under 1 years old); adults over 60 years; immunocompromised individuals; people with diabetes; women in the third trimester of pregnancy; and certain ethnic groups, including African-Americans and Filipinos (LACDPH 2015). Generally, once an individual contracts Valley Fever, this individual will likely gain immunity to further Valley Fever contraction.

The Los Angeles County Department of Public Health (LACDPH) maintains an inventory of reported cases of notifiable diseases within Los Angeles County as a whole. From 2008-2013, reported cases of Valley Fever averaged 4.4 percent of all notifiable diseases reported within the

County (LACDPH 2013a). The LACDPH 2013 Annual Morbidity Report found the following trends related to Valley Fever in Los Angeles County in 2013:

- Service Planning Area (SPA) 1 (i.e. Antelope Valley) reported the highest incidence rate of coccidioidomycosis in Los Angeles County, 18.9 per 100,000; though, this represents a slight decrease from the previous year.
- There were 23 cases of disseminated coccidioidomycosis reported in Los Angeles County.
- Case fatality rate is 2 percent.
- Overall, the Los Angeles County incidence rate for coccidioidomycosis has been gradually increasing in the last ten years, and doubled in the past 5 years.
- Cases occurred primarily in the elderly; the greatest number of reported cases was in the 55-64 year age group, which also had the highest incidence rate, 7.1 cases per 100,000.
- Males represented 67 percent of cases; females 33 percent.
- In 2013, whites had the highest percentage of cases with 36 percent as compared to other racial groups. However, the incidence rate for blacks at 6.4 cases per 100,000 was highest among racial groups, consistent with previous years.

The County surmises that the recent increase may be partially attributed to the increasing population of Antelope Valley, where the majority of Los Angeles County cases occur, accompanied by increased construction activities that result in soil disturbance and a greater associated risk of exposure. The LACDPH publishes their Acute Communicable Disease Manual, most recently updated in October 2014. This Manual sets forth the required protocols for a diagnosed case of Valley Fever, which must be reported within seven calendar days (CCR, Title 17, Sections 2500 and 2558). The LACDPH emphasizes dust control in endemic areas as the primary means of prevention (LACDPH 2013b).

Sensitive Receptors

Certain groups of people, such as the elderly, children, and persons with respiratory illnesses or impaired lung function because of other illnesses, are more sensitive to airborne pollutants. Sensitive receptors are land uses that provide facilities and/or structures where these sensitive persons live or spend considerable amounts of time. These land uses include, but are not limited to schools, school yards, day care facilities, hospitals, rest homes, long-term medical facilities, and parks/playgrounds. Residences are also considered to be sensitive receptors because of their potential to house children and the elderly.

The inmates of the MLWDC are considered sensitive receptors. The nearest off-site sensitive receptors to the Project are residents living in the small apartment complex and residential uses located west of the Project site, the closest being approximately 65 feet from the anticipated construction of the access/entrance to the Project site and approximately 0.15 mile from the proposed operations and buildings internal to the site. Other sensitive receptors in the vicinity of the Project include two residential homes approximately 0.20 mile and 0.32 mile to the north of the Project site boundary; juveniles at the Challenger Memorial Youth Center (CMYC) located 0.17 mile east of the Project site boundary; and prisoners in housing units of the California State Prison, Los Angeles County (CSP-LAC) located approximately 0.30 mile south of the Project site.

4.2.3 THRESHOLDS OF SIGNIFICANCE

The following thresholds of significance are derived from the Environmental Checklist in Appendix G of the California Environmental Quality Act (CEQA) Guidelines. A project would result in a significant adverse impact related to Air Quality if it would:

Threshold 4.2a Conflict with or obstruct implementation of the applicable air quality plan.

Threshold 4.2b Violate any air quality standard or contribute substantially to an existing or projected air quality violation.

Threshold 4.2c Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors).

Threshold 4.2d Expose sensitive receptors to substantial pollutant concentrations.

Threshold 4.2e Create objectionable odors affecting a substantial number of people.

The AVAQMD has established “Significant Emissions Thresholds” as shown in Table 4.2-4 below and include both daily and annual values. As stated in the AVAQMD *CEQA and Federal Conformity Guidelines*, “phases shorter than one year should be compared to the daily value”. A project with emission rates below these standards is considered to have a less than significant effect on regional air quality throughout the AVAQMD portion of the MDAB (AVAQMD 2011).

**TABLE 4.2-4
AVAQMD CRITERIA POLLUTANT SIGNIFICANT EMISSIONS THRESHOLDS**

Criteria Pollutant	Annual Standard (tons)	Daily Standard (lbs)
CO	100	548
NOx	25	137
VOC	25	137
SOx	25	137
PM10	15	82
PM2.5	15	82
H ₂ S	10	54
Lead	0.6	3

lbs: pounds; CO: carbon monoxide; NOx: nitrogen oxides; VOC: volatile organic compounds; SOx: sulfur oxides; PM10: respirable particulate matter less than 10 microns in diameter; PM2.5: fine particulate matter less than 2.5 microns in diameter; H₂S: hydrogen sulfide.
Source: AVAQMD 2011.

4.2.4 PROJECT DESIGN FEATURES

PDF AIR-1 The following administrative controls and hazard awareness actions will be included in the Contractor's Specifications:

1. Prior to Project construction initiation, and for any personnel additions after Project construction initiation, the County's contractor shall be informed of the following California Department of Public Health (CDPH) materials on Valley Fever, or any updated materials as applicable, will be distributed to worksite supervisors:
 - i. CDPH pamphlet entitled "Preventing Work-Related Coccidiomycosis (Valley Fever)" available at:
<http://www.cdph.ca.gov/programs/hesis/Documents/CocciFact.pdf> (CDPH 2013a).
2. Prior to Project construction initiation, and for any personnel additions after Project construction initiation, the County's contractor shall be informed of the following CDPH materials on Valley Fever, as well as any updated materials as applicable, will be distributed to construction workers:
 - i. CDPH pamphlet entitled "Valley Fever Fact Sheet" available at:
<http://www.cdph.ca.gov/HealthInfo/discond/Documents/VFGeneral.pdf> (CDPH 2013b).
 - ii. CDPH pamphlet entitled "Hoja de datos de la Fiebre del Valle (Valley Fever Fact Sheet in Spanish)" available at:
<http://www.cdph.ca.gov/HealthInfo/discond/Documents/HojaDeDatosDeLaFiebreDelValle.pdf> (CDPH 2013c).
 - iii. CDPH pamphlet entitled "Fact Sheet ng Valley Fever (Valley Fever Fact Sheet in Tagalog)," available at:
<http://www.cdph.ca.gov/HealthInfo/discond/Documents/TagalogGeneralValleyFeverFactSheet.pdf> (CDPH 2013d).

PDF AIR-2 The Contractor's Specifications will be required to comply with County's Specifications No. 7266, which require best management practices for construction activities. These Best Management Practices include:

- Eroded sediments and other pollutants must be retained on site and may not be transported from the site via sheetflow, swales, area drains, natural drainage courses or wind.
- Stockpiles of earth and other construction related materials must be protected from being transported from the site by the forces of wind or water.
- Fuels, oils, solvents and other toxic materials must be stored in accordance with their listing and are not to contaminate the soil and surface waters. All approved storage containers are to be protected from the weather. Spills must be cleaned up immediately and disposed of in a proper manner. Spills may not be washed into the drainage system.
- Excess or waste concrete may not be washed into the public way or any other drainage system. Provisions shall be made to retain concrete waste on sites until they can be disposed of as solid waste.

- Trash and construction related solid wastes must be deposited into a covered receptacle to prevent contamination of rainwater and dispersal by wind.
- Sediments and other materials may not be tracked from the site by vehicle traffic. The construction entrance roadways must be stabilized so as to inhibit sediments from being deposited into the public way. Accidental depositions must be swept up immediately and may not be washed down by rain or other means.
- Any slopes with disturbed soils or denuded of vegetation must be stabilized so as to inhibit erosion by wind and water.

PDF AIR-3 The Contractor's Specifications will require that on-site gardening activities will be conducted in contained raised beds only and will be filled with imported soils derived from outside the Antelope and Kern Valleys so that inmates would not be interacting directly with local soils.

4.2.5 REGULATORY REQUIREMENTS

RR AIR-1 All construction activities will be conducted in compliance with any applicable AVAQMD rules and regulations, including but not limited to the following:

- Rule 403, Fugitive Dust, for controlling fugitive dust and avoiding nuisance.
- Rule 402, Nuisance, which states that a Project shall not "discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property".
- Rule 1113, which limits the volatile organic compound content of architectural coatings.
- Rules 201, 203 and 219, which regulate permits for installation and use of equipment that may generate air contaminants, such of commercial kitchen equipment and emergency generators.

RR AIR-2 All construction activities will be conducted in compliance with Department of Health -Infection Control Policy Guidelines Procedure No.918.01, which requires that building additions, demolition, retrofit, alterations, new construction comply with the Infection Control Policy.

RR AIR-3 All construction activities will be conducted in compliance with 13 CCR §2485, which requires that all diesel-fueled commercial motor vehicles must not idle for more than 5 consecutive minutes at any location.

4.2.6 ENVIRONMENTAL IMPACT ANALYSIS

Threshold 4.2a Would the project conflict with or obstruct implementation of the applicable air quality plan?

Short-Term and Long-Term Impacts

The AVAQMD's current air quality plans, pursuant to the State Implementation Plan (SIP) and California Clean Air Act (CCAA) requirements applicable to the Project site are the *AVAQMD 2004 Ozone Attainment Plan (State and Federal)* and the *AVAQMD Federal 8-Hour Ozone Attainment Plan (Western Mojave Desert Non-attainment Area)* (AVAQMD 2011).

As stated in the AVAQMD's CEQA and Federal Conformity Guidelines, "A project is deemed to not exceed this threshold, and hence not be significant, if it is consistent with the existing land use plan" (AVAQMD 2011). As described in Section 2.1 of this EIR, The Project site is zoned by the City of Lancaster as P - Public Use and is designated as "Public" in the City's General Plan (Lancaster 2009). As discussed in Section 4.9, Land Use and Planning, the Project would not require a zone change, a General Plan amendment, or any other discretionary action related to land use. Thus, the Project would remain consistent with the land use designation for the site, as contained in the Lancaster General Plan. There would be no impact.

Threshold 4.2b Would the project violate any air quality standard or contribute substantially to an existing or projected air quality violation?

Construction and operational emissions were calculated by using CalEEMod Version 2013.2.2. CalEEMod is a computer program that is used to calculate anticipated emissions associated with land development projects in California. CalEEMod uses pollutant emission rates from the CARB's Emission FACTor model (EMFAC 2011) for on-road vehicles; CARB's OFFROAD 2011 for construction and material handling equipment; and USEPA formulas for non-vehicular emissions. Where appropriate, emission factors, trip distance, and other data in the model are specific to a county or air basin. The Los Angeles County – Mojave Desert data were used for the proposed Project. The model calculates emissions of the following criteria pollutants: VOC, NOx, CO, SO₂, PM₁₀, and PM_{2.5}.

Specific inputs to CalEEMod for both construction and operations include land uses and acreages associated with the Project. Construction input data include but are not limited to the start and finish dates of construction phases; inventories of construction equipment to be used during each phase; volumes of structures to be demolished; volumes of materials to be imported to and exported from the site; areas to be paved; and areas to be painted. Output emissions data are provided for off-road equipment, on-road vehicles, fugitive dust from grading, and VOCs from asphalt and architectural coatings.

Operational inputs include the year of analysis and vehicle trip generation rates. Output operational emissions data categories include area, energy, and mobile sources. Area sources are landscape maintenance equipment, consumer products, and architectural coatings used for routine maintenance. Energy emissions are from natural gas consumption. Mobile sources are the vehicles used by staff, visitors, and vendors, and include buses used for inmate transport. The mobile source emissions were derived from trip generation forecasts for the Project as described in Section 4.13, Transportation and Traffic, and Appendix H of this EIR.

The CalEEMod model also includes data to calculate emissions reductions resulting from the implementation of regulatory requirements (RRs). As discussed previously, the AVAQMD

establishes significance thresholds to assess the impact of Project-related air pollutant emissions. Table 4.2-4 above summarizes the AVAQMD's significance thresholds.

Short-Term Construction Impacts

Construction of the Project is expected to begin in December of 2016 and be completed by the fourth quarter of 2019, totaling approximately 35 months. Demolition activities would take approximately 3 months and include the removal of approximately 5,624 cubic yards (cy) of material from buildings and approximately 4,560 cy of pavement materials. Removal of demolished materials would require 376 truck round trips⁴ at a distance of 12 miles. Grading would require approximately 3 months and cover approximately 7 acres. Cut and fill would be balanced on site; no import or export of soils would occur. Physical building construction and renovation is planned to require approximately 25 months. Paving of parking areas and internal roads and painting of buildings would occur during the final 7 months of construction.

All construction activities must be conducted in compliance with all applicable AVAQMD rules and regulations. RR AIR-1 provides a listing of the most applicable AVAQMD Rules (RR AIR-1). Rule 403, Fugitive Dust, requires measures such as watering and control of track-out from the site. Rule 403 also requires submittal of a Dust Control Plan prior to the start of construction on a non-residential development that will include five acres or more of disturbed surface area. Dust-control measures consistent with Rule 403 would control fugitive dust and avoid nuisance and are included in the CalEEMod inputs in Appendix B. Construction would also be required to comply with the Rule 402, Nuisance, which prohibits the emission of quantities of air contaminants that could cause injury, detriment, nuisance, or annoyance to the public, or that endanger the comfort, repose, health or safety of the public.

The principal source of the VOC emissions during construction would be architectural coatings, which would be applied during the last seven months of Project construction. RR AIR-1 requires that paints comply with the AVAQMD's Rule 1113 to reduce VOC emissions. Compliance with Rule 1113 is assumed in the emissions calculations. The principal source of NOx emissions would be the diesel engines from construction equipment during demolition, grading, and building activities, and the principal source of PM10 and PM2.5 emissions would be fugitive dust during earth-moving activities.

Table 4.2-5 includes the results of the calculations for the estimated peak daily construction emissions during each year of construction activity. As shown, there would be no exceedance of thresholds for criteria pollutants established by the AVAQMD when measured by the maximum daily construction emissions. Impacts would be less than significant and no mitigation is required.

⁴ Truck trip estimations assume the use of a double-trailer for material export that would be capable of hauling approximately 27 cy of material per trip.

**TABLE 4.2-5
ESTIMATED ANNUAL PEAK DAILY CONSTRUCTION EMISSIONS
(LBS/DAY)**

Year	VOC	NOx	CO	SOx	PM10	PM2.5
2016	3	29	23	<0.5	3	2
2017	4	45	33	<0.5	8	5
2018	2	15	15	<0.5	2	1
2019	31	23	23	<0.5	2	1
AVAQMD Daily Thresholds	137	137	548	137	82	82
Exceeds AVAQMD Thresholds?	No	No	No	No	No	No

lbs/day: pounds per day; VOC: volatile organic compound; NOx: nitrogen oxides; CO: carbon monoxide; SOx: sulfur oxides; PM10: respirable particulate matter with a diameter of 10 microns or less; PM2.5: fine particulate matter with a diameter of 2.5 microns or less; AVAQMD: Antelope Valley Air Quality Management District.

Sources: AVAQMD 2011 (thresholds). Emissions calculations can be found in Appendix B.

Table 4.2-6 includes the results of the calculations for the estimated construction emissions during each year of construction activity. As shown, there would be no exceedance of thresholds for criteria pollutants established by the AVAQMD when measured annually. Impacts would be less than significant and no mitigation is required.

**TABLE 4.2-6
ESTIMATED ANNUAL TOTAL CONSTRUCTION EMISSIONS (TONS)**

Year	VOC	NOx	CO	SOx	PM10	PM2.5
2016	0.1	0.6	0.5	<0.05	0.1	<0.05
2017	0.3	3.2	2.6	<0.05	0.4	0.3
2018	0.3	2.0	2.0	<0.05	0.2	0.1
2019	2.4	2.1	2.1	<0.05	0.2	0.1
AVAQMD Annual Thresholds	25	25	100	25	15	15
Exceeds AVAQMD Thresholds?	No	No	No	No	No	No

VOC: volatile organic compound; NOx: nitrogen oxides; CO: carbon monoxide; SOx: sulfur oxides; PM10: respirable particulate matter with a diameter of 10 microns or less; PM2.5: fine particulate matter with a diameter of 2.5 microns or less; AVAQMD: Antelope Valley Air Quality Management District.

Sources: AVAQMD 2011 (thresholds). Emissions calculations can be found in Appendix B.

It should be noted that the Design-Build contractor may request an expedited schedule to work on Saturdays and/or to increase the intensity of the daily construction operations through the use of more equipment/workers on-site than anticipated in the Project's proposed schedule (see Section 3.0, Project Description). This request would be considered for the purpose of reducing the duration of the Project construction period. For the purposes of this analysis, and to provide a conservative assessment of possible additional air quality impacts, construction equipment was assumed to be double what is assumed under the typical construction scenario. A potential doubling of the intensity of construction activities could approximately double the maximum daily emissions. As shown in Table 4.2-5, a doubling of emissions would not result in emissions approaching or exceeding the applicable thresholds. The impact would be less than significant and no mitigation would be required.

The emissions modeling assumes a 5-day work week. If some or all construction would occur on a 6-day per week schedule and/or the schedule would be shortened by using more equipment, annual emissions may increase for the years affected. Because the total construction effort would not change, there would be offsetting decreases of air emissions later in the Project construction

schedule. As shown in Table 4.2-6, the Project could be compressed into a single year and the annual emissions would be less than one-third of the applicable annual thresholds. The impact would be less than significant and no mitigation would be required.

Long-Term Operational Impacts

Regional Emissions

Emissions were calculated using the CalEEMod Version 2013.2.2 model, described above. The complete results of the CalEEMod modeling calculations are presented in Appendix B of this EIR. As described in the Project Traffic Impact Study (Appendix H of this EIR), it is anticipated that the relocation of inmates to the MLWDC would result in additional vehicle miles traveled (VMT) by visitors on weekends and holidays, inmate buses, and by service/delivery trucks seven days per week when compared to visiting at the Century Regional Detention Facility (CRDF) located in the City of Lynwood. The worst-case estimate is an increase of 2,500 VMT on a weekday and 25,700 VMT on a weekend day or holiday. To account for the increased VMT, CalEEMod default trip distances were adjusted to add approximately 3.26 million annual VMT to the VMT generated with default trip distances.

The projected annual operational emissions (which include area, energy, and mobile sources) are shown in Table 4.2-7 below. The primary source of NOx, CO, PM10, and PM2.5 emissions generated by the Project would be from motor vehicles. The primary source of VOC emissions would be consumer products (an area source) used by staff and inmates, including cleaning supplies and personal products. Reduced energy use resulting from compliance with RR GHG-1 (LEED-equivalent design for the three new buildings with more than 10,000 sf of area) were not included in the emissions calculations because the amount of reduction cannot be reasonably quantified (see Section 4.6 Greenhouse Gas Emissions). Therefore, the energy-related emissions estimates in Table 4.2-7 are conservatively high.

**TABLE 4.2-7
ESTIMATED ANNUAL OPERATIONAL EMISSIONS (TONS)**

Emission Source	VOC	NOx	CO	SOx	PM10	PM2.5
Area Source Emissions ^a	2.6	<0.05	3.1	<0.05	<0.05	<0.05
Energy Emissions ^a	<0.05	0.3	0.2	<0.05	<0.05	<0.05
Vehicle Emissions ^a	0.9	2.8	14.4	<0.05	2.6	0.7
Offroad Emissions ^a	<0.05	0.3	0.3	<0.05	<0.05	<0.05
Total Project Emissions^b	3.6	3.5	18.0	<0.2	2.8	0.8
AVAQMD Annual Thresholds	25	25	100	25	15	15
Exceeds AVAQMD Thresholds?	No	No	No	No	No	No
VOC: volatile organic compounds; NOx: nitrogen oxides; CO: carbon monoxide; SOx: sulfur oxides; PM10: respirable particulate matter with a diameter of 10 microns or less; PM2.5: fine particulate matter with a diameter of 2.5 microns or less; AVAQMD: Antelope Valley Air Quality Management District. ^a Values shown are higher of either summer or winter emissions. ^b Totals may not add due to rounding. Sources: AVAQMD 2011 (thresholds). Emissions calculations can be found in Appendix B.						

As shown in Table 4.2-7, the estimated annual operational emissions due to Project-related operations would not exceed the AVAQMD CEQA significance thresholds and there would be a less than significant impact. No mitigation is required.

Threshold 4.2c Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?

As discussed above, the region is a nonattainment area for PM₁₀ and O₃. The Project would contribute criteria pollutants to the area during short-term construction and long-term operational activities. The analysis of the Project's incremental contribution to criteria air pollutants for which the AVAQMD is designated as a nonattainment area is provided below. The additional analysis of cumulative impacts, as required by Section 15130 of the State CEQA Guidelines for all other air quality-related impact questions is provided below in Section 4.2.7, Cumulative Impacts.

Short-Term Construction Impacts

Construction would result in less than significant temporary construction-related regional and localized air quality impacts, as quantified above in Tables 4.2-5 and 4.2-6. Short-term cumulative impacts related to air quality could occur if Project construction and construction for other projects in the surrounding area were to occur simultaneously. In particular, with respect to local impacts, the consideration of cumulative construction particulate (PM₁₀ and PM_{2.5}) impacts is limited to cases when projects constructed simultaneously are within a few hundred yards of each other because of (1) the combination of the short range (distance) of particulate dispersion (especially when compared to gaseous pollutants) and (2) the AVAQMD's required dust control measures, which further limit particulate dispersion from a project site.

There are 80 City of Lancaster projects identified in Table 2-1, and shown on Exhibit 2-4 of this EIR (see Section 2.0, Environmental Setting); some of these projects have the potential to have an overlapping construction schedule with the Project. The closest of these related projects are more than ½ mile to the south and more than ½ mile to the east of the Project site. Due to distance between these sites and the Project site, and the requirement for all projects to implement dust-control measures, cumulative emissions of PM₁₀ would be less than significant.

As shown in Table 4.2-5, maximum daily missions of O₃ precursors VOC and NO_x would be substantially less than AVAQMD significance thresholds throughout the construction period with the exception of a two-month period in 2019 when VOC emissions could approach approximately 75 percent of the threshold. VOC emissions of cumulative projects that would occur concurrently with 2019 painting activities for the Project are not known. However, because painting would occur for only two months at the Project site, it is concluded that the VOC emissions would not be cumulatively considerable, and therefore cumulative O₃ impacts would be less than significant.

Long-Term Operational Impacts

As shown in Table 4.2-7 above, the estimated annual operational emissions of VOC and NO_x (O₃ precursors) and PM₁₀ would be less than 15 percent of the AVAQMD significance thresholds. As shown in the analysis for Threshold 4.2a above, the Project would not conflict with applicable AVAQMD air quality management plans. Because the AVAQMD plans are regularly updated (approximately every 3 years) and consider the cumulative emissions of existing and projected development, it may be concluded that a project that conforms with the applicable air quality plans and does not have a direct air quality impact, such as the Project, would not have a cumulative regional air quality impact. Therefore, there would be a less than significant impact and no mitigation is required.

Threshold 4.2d Would the project expose sensitive receptors to substantial pollutant concentrations?

Short-Term Construction Impacts

Toxic Air Contaminants

The greatest potential for toxic air contaminant emissions during construction would be related to diesel PM emissions associated with heavy equipment operations during earth-moving activities. The assessment of cancer risk is typically based on a 70-year exposure period for residents and a 40-year exposure period for workers. Construction activities associated with the Project would be sporadic, transitory, and short term in nature (i.e., less than three years). Because exposure to diesel exhaust would be well below the 70-year and 40-year exposure periods, construction of the Project is not anticipated to result in an elevated cancer risk to exposed persons due to the short-term nature of construction. Additionally, pursuant to 13 CCR §2485 (RR AIR-2), all diesel-fueled commercial motor vehicles must not be left idling for more than 5 consecutive minutes at any location. As such, Project-related TAC emission impacts during construction would not be significant and no mitigation is required.

Valley Fever

The greatest potential risk for Valley Fever exposure is during construction, particularly to workers on site, where construction-related activities may cause Valley Fever spores to be released from dormancy. Valley Fever fungal spores may be released through natural wind or ground-disturbing activities on undeveloped land. Valley Fever has been a concern in the Antelope Valley for many years. Although not a criteria air pollutant, Valley Fever fungal spore infections develop through inhalation of airborne fungal spores contained in windblown dust, and is recognized to be endemic in areas with dry, alkaline soil conditions. The Project's construction would involve short-term bulk storage of soils, earth moving, construction and demolition, and man-made conditions that can cause fugitive dust emissions. Grading or other soil-disturbing activities have been known to release the spores into the air, thereby increasing the risk that nearby people could inhale the spores. Construction workers are at a higher risk of contracting Valley Fever, due to construction-related activities that disturb the soil on site.

All construction activity for the Project would be conducted under a Dust Control Plan prepared in accordance with the AVAQMD's Rule 403 (RR AIR-1). Examples of AVAQMD Rule 403 regulations include using chemical stabilizers; pre-watering the construction site; ensuring there is no visible dust outside the property line; using wind barriers, fences or tarps; limiting soil, sand, and gravel track-out to within 25 feet of the active operation; establishing vegetative ground cover within 30 days after construction has finished; and restricting periods of active construction. RR AIR-1 requires that the Project construction activities be conducted in compliance with all dust suppression measures as set forth in the Dust Control Plan.

As stated in RR AIR-2, the Project will be constructed in compliance with the Los Angeles County Department of Health Services -Infection Control Policy Guidelines Procedure No.918.01. Policy 918 is intended to prevent the spread of diseases, which may be caused by construction induced airborne pollution in susceptible individuals (patients, staff and the public) in County Department of Health Services (DHS) facilities. Infection Control Plans must include infection control measures to contain dust, debris, etc. and protect the patients, employees and visitors in this environment.

Compliance with RR AIR-1 and RR AIR-2 would ensure that potential impacts associated with on-site construction workers' exposure to Valley Fever would be less than significant and no

mitigation is required. Although the AVAQMD's Rule 403 and DHS Policy 918 set for rigorous regulations to minimize fugitive dust and airborne hazards, due to the potential hazards associated with exposure to Valley Fever spores and in order to provide accurate and up-to-date information health protection measures for on-site workers, PDF AIR-1 would be incorporated into the Project.

PDF AIR-1 requires training workers and supervisors regarding dust-prevention protocol and Valley Fever and assigns responsibility for distributing information documents to supervisors and workers, who would be most susceptible to Valley Fever exposure. Additionally, PDF AIR-2 sets forth information related to the County's best management practices for construction activities, which includes measures for dust control and suppression. Incorporation of PDF AIR-1 and PDF AIR-2, and compliance with RR AIR-1 and RR AIR-2 would ensure that impacts to construction workers and other on-site personnel during construction would be less than significant.

Long-Term Operational Impacts

The Project's use of various large equipment (such as commercial kitchen facilities and the emergency generators) may generate air contaminants. However, per RR AIR-1, the Project would have to comply with AVAQMD Rule 201 (requiring a Permit to Construct prior to the installation of any equipment that may cause air contaminants), as well as Rule 203 (requiring a Permit to Operate prior to the use of any equipment that may cause air contaminants). These rules and regulations are required unless the equipment or aspects of the project are exempt under Rule 219, which identifies those equipment, processes, or operations that do not require permits. Impacts from stationary equipment would be less than significant, with compliance with RR AIR-1.

Carbon Monoxide

On-site operational mobile and area sources would be dispersed throughout the Project area and would make a minimal contribution to local ambient pollutant concentrations. For localized CO impacts from mobile sources at congested intersections, an appropriate screening procedure is provided in the procedures and guidelines contained in *Transportation Project-Level Carbon Monoxide Protocol* (the Protocol) to determine whether a project poses the potential for a CO hotspot (UCD ITS 1997). The key criterion is whether the Project would worsen traffic congestion at intersections operating at level of service (LOS) E or F.

An initial screening for the potential for the Project to create a CO hotspot was conducted in accordance with the CO Protocol. The Project traffic analysis, as described in Section 4.13, Transportation and Traffic, of this EIR, indicates that, under Existing with Project and Year 2019 Future conditions, all study area intersections would operate at LOS D or better. Therefore, the Project would not create a CO hotspot. The impact would be less than significant and no mitigation would be required.

Valley Fever

The Project site includes approximately 46 acres, as shown on Exhibit 3-1, Proposed Site Plan. Outdoor pervious areas (e.g. permeable surfaces such as landscaping or soil) would include approximately 44 percent of the Project site, while the remaining 56 percent of the site would be impervious (e.g. paved or buildings). Within the secured and fenced property, approximately 1.5 acres (63,400 sf) will be designated for outdoor recreational activities and program space that will be accessible to the female inmates (e.g. sports courts and recreation fields, gardens, courtyards-passive recreational areas). These outdoor recreational areas and other non-paved areas on the Project site would be covered with landscaping, turf grass, gravel, or landscaping/wood chip

ground cover that would minimize the opportunity for soils to become airborne. It is possible that exposed soils could occur in discrete areas of the Project site, and soils in the Antelope Valley have potential to contain Valley Fever spores. Additionally, the Project site is located adjacent to land on the east that has exposed native soils (i.e. 2 MW solar array), and is situated in the context of many acres of undeveloped land and fallow farmland that could generate airborne dust during windstorms. Therefore, the future inmate population has the potential to be exposed to dust generated from soils within the Antelope Valley, which have the potential to contain coccidioidomycosis (i.e. Valley Fever) spores.

The California Department of Corrections and Rehabilitation (CDCR) determined the State prison facilities that are located in the geographic area where Valley Fever has been reported to be most common are: Avenal State Prison (ASP) in Kings County; Substance Abuse Treatment Facility (SATF) in Kings County; California State Prison-Corcoran in Kings County; California Men's Colony (CMC) in San Luis Obispo County; Pleasant Valley State Prison (PVSP) in Fresno County; California Correctional Institution (CCI) in Kern County; Kern Valley State Prison (KVSP) in Kern County; North Kern State Prison (NKSP) in Kern County; and Wasco State Prison in Kern County (WSP) (U.S. District Court 2013). In 2011, 535 of the 640 reported Valley Fever cases within the CDCR (approximately 85 percent) occurred at ASP and PVSP.

In response to concerns over potential exposure of prisoners to Valley Fever at these prisons and facilities, CDCR instituted a new medical policy that requires certain prisoners to be transferred out of these nine prisons within 60 days. Additionally, CDCR's new medical policy prohibits the placement of certain high-risk prisoners at ASP or PVSP, which are the State prisons known to have a higher risk of Valley Fever exposure (PLO 2015). ASP located in Kings County and PVSP located in Fresno County are approximately 142 miles and approximately 150 miles northwest of the Project site, respectively.

The nine prisons and facilities identified by the CDCR as having a higher risk of exposure to Valley Fever do not include the California State Prison- Los Angeles County, located in the City of Lancaster, which is adjacent to the MLWDC Project site. As such, the CDCR has not identified the Lancaster area being a geographic location that requires screening or interventions for the State prison population with regard to exposure to Valley Fever.

Because the majority of the Project site will be paved or landscaped, there are few opportunities for on-site soils to produce airborne dust. For gardening activities facilitated through the MLWDC programs, inmates would not be interacting directly with on-site soils because the program would involve gardening within contained/raised soil beds that are filled with gardening soils suitable for growing food (see PDF AIR-2). The use of purchased gardening soil would eliminate the opportunity for inmate excavation and digging into native soils in the gardening activities.

The operation of the MLWDC will follow standard LASD procedures for medical care and prevention with regard to health care for inmates in general, and Valley Fever specific all and will continue to coordinate with LACDPH (Masis 2015). The LACDPH is the designated County agency with the mandate to protect health, prevent disease, and promote the health and well-being of all persons within Los Angeles County. As such, any future changes in LACDPH policies that may be made regarding Valley Fever for inmate populations will be implemented, as applicable, throughout the LASD jail system. Therefore, there would be a less than significant Valley Fever impact at this site during long-term operations, and no mitigation is required.

Threshold 4.2e Would the project create objectionable odors affecting a substantial number of people?

Short-Term Construction Impacts

Construction of the Project would involve equipment and activities that would generate odors. Potential construction odors include the on-site construction equipment's diesel exhaust and roofing, painting, and paving operations. There may be situations where construction activity odors would be noticed by the existing population in the immediate vicinity. These odors would be temporary and would dissipate rapidly from the source (i.e., the Project site) with an increase in distance. Therefore, the presence of potential odors would be short-term and would not affect a substantial number of people. As such, there would be a less than significant impact. No mitigation would be required.

Long-Term Operational Impacts

Land uses associated with odor complaints typically include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding. The Project would not include any of these uses, nor would it include) other activities that would produce objectionable odors. However, the Project has a kitchen on-site (Building 41) and odors characteristic to some foods and some cooking processes would be emitted. The kitchen is ¼ mile from the nearest off-site receptor and kitchen odors would not be detected at that distance except, perhaps, under extraordinary meteorological conditions. Therefore, impacts would be less than significant and no mitigation is required.

4.2.7 CUMULATIVE IMPACTS

This section provides an analysis of cumulative impacts from construction and operation of the Project and other past, present, and reasonably foreseeable future projects, as required by Section 15130 of the State CEQA Guidelines. The past, present, and reasonably foreseeable future projects (i.e., related projects) used for this analysis are presented in Section 2.4, Cumulative Projects, of this EIR.

Construction-Related Cumulative Impacts

As discussed under Threshold 4.2b above, the Project would result in less than significant temporary construction-related regional air quality impacts for all criteria pollutants. Except for the two-month painting period discussed under Threshold 4.2c, construction emissions of all criteria pollutants would be less than ½ of the applicable thresholds. It is reasonable to assume that construction emissions of the related projects listed in Table 2-1 (from Section 2.0, Environmental Setting) would be limited by applicable AVAQMD rules. Therefore, because of the minimal amount of Project-related emissions relative to significance thresholds, and because of compliance with AVAQMD rules, it is concluded that regional construction emissions would not be cumulatively considerable. Construction of the Project would result in no significant unavoidable direct or cumulative impacts related to air quality, including cumulative impacts related to PM₁₀ and O₃ for which the AVAQMD portion of the MDAB is in nonattainment.

As discussed above under Thresholds 4.2d and 4.2e, there would be less than significant impacts related to exposure of sensitive receptors to diesel PM (i.e., TACs) and odors. Short-term cumulative impacts for criteria pollutants, diesel PM, and odors could occur if construction associated with the Project and surrounding current and future development was to occur simultaneously. Similar to the discussion for the PM₁₀ analysis of Threshold 4.2c (cumulative impacts for non-attainment criteria pollutants), consideration of cumulative construction-related

impacts for diesel PM and odors is limited to cases when projects are in close proximity to the Project site (e.g., adjacent to or within ¼ mile), because the distance of dispersion of these emissions is not great. Therefore, a related project site would need to be in close proximity and occurring simultaneously to contribute diesel PM and odor emissions such that a cumulatively considerable effect could occur. The closest potentially cumulative projects are more than ½ mile to the south and more than ½ mile to the east of the Project site. Due to distance between these sites and the Project site, cumulative diesel PM and odor impacts would be less than significant.

Operation-Related Cumulative Impacts

As discussed under Threshold 4.2b above, the Project would result in less than significant long-term operational air quality impacts for all criteria pollutants. As discussed under Threshold 4.2c, because the AVAQMD air quality plans are regularly updated and consider the cumulative emissions of existing and projected development, it may be concluded that a project that conforms to the applicable air quality plans and does not have a direct air quality impact would not have a cumulative regional air quality impact. Therefore, the Project would have a less than significant cumulative air quality impact related to long-term regional emissions of all criteria pollutants. Operation of the Project would result in no significant unavoidable direct or cumulative impacts related to air quality, including cumulative impacts related to PM₁₀ and O₃ for which the AVAQMD portion of the MDAB is in nonattainment.

The analysis for local CO hotspot impacts under Threshold 4.2d is based on a traffic analysis that includes cumulative projects; see Section 4.23, Transportation, of this EIR. Therefore, the screening analysis that demonstrated a less than significant impact is inherently a cumulative analysis, and the cumulative impact would be less than significant.

Regarding odors, as discussed under threshold 4.2e, there is no related future project in the immediate vicinity of the site that could potentially contribute to a cumulative impact for odor emissions. Therefore, the Project would result in less than significant cumulative impacts related to odors.

4.2.8 MITIGATION MEASURES

No significant impacts related to air quality have been identified; therefore, no mitigation measures are required.

4.2.9 LEVEL OF SIGNIFICANCE AFTER MITIGATION

No significant air quality impacts would occur, and impacts would be less than significant.

4.2.10 REFERENCES

- Antelope Valley Air Quality Management District (AVAQMD). 2015 (February 17, last accessed). AVAQMD Designations and Classifications. Lancaster, CA: AVAQMD. <http://www.avaqmd.ca.gov/index.aspx?page=289>.
- . 2011 (August). *Antelope Valley AQMD California Environmental Quality Act (CEQA) and Federal Conformity Guidelines*. Lancaster, CA: AVAQMD. <http://www.avaqmd.ca.gov/Modules/ShowDocument.aspx?documentid=2911>.
- . 2008. (May 20, adopted). *AVAQMD Federal 8-Hour Ozone Attainment Plan (Western Mojave Desert Non-attainment Area)*. Lancaster, CA: AVAQMD. <http://www.avaqmd.ca.gov/Modules/ShowDocument.aspx?documentid=923>.

-
- . 2004 (April 20). *AVAQMD 2004 Ozone Attainment Plan (State and Federal)*. Lancaster, CA: AVAQMD. <http://www.avaqmd.ca.gov/Modules/ShowDocument.aspx?documentid=922>.
- . 1977 (as amended through 2013). Rule 1113: Architectural Coatings. Lancaster, CA: AVAQMD. <http://www.avaqmd.ca.gov/Modules/ShowDocument.aspx?documentid=790>.
- . 1976a (as amended through 1997). Rule 201: Permit to Construct. Lancaster, CA: AVAQMD. <http://www.avaqmd.ca.gov/Modules/ShowDocument.aspx?documentid=901>.
- . 1976b (as amended through 1997). Rule 203: Permit to Operate. Lancaster, CA: AVAQMD. <http://www.avaqmd.ca.gov/Modules/ShowDocument.aspx?documentid=899>.
- . 1976c (as amended through 2011). Rule 219: Equipment Not Requiring a Permit. Lancaster, CA: AVAQMD. <http://www.avaqmd.ca.gov/Modules/ShowDocument.aspx?documentid=888>.
- . 1976d (April, adopted). Rule 402: Nuisance. Lancaster, CA: AVAQMD. <http://www.avaqmd.ca.gov/Modules/ShowDocument.aspx?documentid=866>.
- . 1976e (as amended through 2010). Rule 403: Fugitive Dust. Lancaster, CA: AVAQMD. <http://www.avaqmd.ca.gov/Modules/ShowDocument.aspx?documentid=867>.
- California Air Resources Board (CARB). 2015 (June 2, last accessed). *Top 4 Summaries at the Lancaster-43301 Division Street Monitoring Station*. Sacramento, CA: CARB. <http://www.arb.ca.gov/adam/topfour/topfour1.php>.
- . 2015b (October 1). Ambient Air Quality Standards. Sacramento, CA: CARB. <http://www.arb.ca.gov/research/aaqs/aaqs2.pdf>.
- California Department of Health Services (CDHS). 2014 (October 14, Last accessed). *Coccidioidomycosis (Valley Fever)*. Sacramento, CA: CDHS. <http://www.cdph.ca.gov/HealthInfo/discond/Pages/Coccidioidomycosis.aspx>.
- California Department of Public Health (CDPH). 2014 (January 21). *Epidemiologic Summary of Coccidioidomycosis in California, 2009-2012*. <https://www.cdph.ca.gov/programs/sss/Documents/CocciEpiSummary09-12.pdf>
- . 2013a (June). Preventing Work-Related Coccidioidomycosis (Valley Fever). Sacramento, CA: CDPH. <http://www.cdph.ca.gov/HealthInfo/discond/Pages/Coccidioidomycosis.aspx>.
- . 2013b (September). *Valley Fever Fact Sheet*. Sacramento, CA: CDPH. <http://www.cdph.ca.gov/HealthInfo/discond/Documents/VFGeneral.pdf>.
- . 2013c. (September). *Hoja de datos de la Fiebre del Valle* (Valley Fever Fact Sheet in Spanish). Sacramento, CA: CDPH. <http://www.cdph.ca.gov/HealthInfo/discond/Documents/HojaDeDatosDeLaFiebreDelValle.pdf>.
- . 2013d. (August). *Fact Sheet Valley Fever* (Valley Fever Fact Sheet in Tagalog). Sacramento, CA: CDPH. <http://www.cdph.ca.gov/HealthInfo/discond/Documents/TagalogGeneralValleyFeverFactSheet.pdf>.

- . 2012. *Coccidioidomycosis Yearly Summary Report*. Sacramento, CA: CDPH. <http://www.cdph.ca.gov/programs/sss/Documents/COCCI-UPDATED2012YEARLY.pdf>.
- Lancaster, City of. 2009 (July 14). *City of Lancaster General Plan 2030*. Lancaster, CA: the City. <http://www.cityoflancasterca.org/index.aspx?page=427>.
- Linscott, Law and Greenspan (LLG). 2015 (April). *Traffic Impact Study, Mira Loma Women's Detention Center, City of Lancaster, California*. Pasadena, CA: LLG.
- Los Angeles, County of, Department of Public Health (LACDPH). 2015 (August 3). *Frequently Asked Questions- Valley Fever (Coccidioidomycosis)*. Los Angeles, CA: LADPH. <http://publichealth.lacounty.gov/hea/library/topics/valleyfever/CDCP-ACDC-0037-01.pdf>.
- . 2013a. *Acute Communicable Disease Control- 2013 Annual Morbidity Report, Table G Reported Cases of Selected Notifiable Diseases by Year of Onset, Los Angeles County, 2008-2013*. Los Angeles, CA: LADPH. <http://publichealth.lacounty.gov/acd/Diseases/Cases08-13.pdf>
- . 2013b. *Acute Communicable Disease Control- 2013 Annual Morbidity Report- Coccidioidomycosis*. Los Angeles, CA: LADPH. <http://publichealth.lacounty.gov/acd/diseases/Cocci.pdf>
- Masis, E. (2015). October 28. Personal communication between A. Ramos, Sr. Capital Projects Manager County of Los Angeles Department of Public Works and E. Masis, Industrial Hygienist at County of Los Angeles Department of Public Health. Los Angeles, CA.
- Prison Law Office (PLO). 2015. (January). *Valley Fever and CDCR Housing*. San Quentin, CA. <http://www.prisonlaw.com/pdfs/ValleyFever,Jan2015.pdf>
- University of California Davis (UCD), Institute of Traffic Studies (ITS) 1997 (December, as revised). *Transportation Project-Level Carbon Monoxide Protocol* (Prepared for Environmental Program California Department of Transportation by V.J. Garza, P. Graney, and D. Sperling with revisions by D. Niemeier, D. Eisinger, T. Kear, D. Chang, and Y. Meng). Davis, CA: UCD ITS. http://www.dot.ca.gov/dist11/news/163/appendix/co_protcl.pdf.
- U.S. District Court for the Northern District of California. 2013 (Filed June 24). *Marciano Plata, Plaintiffs v. Edmund G Brown Jr., Defendants. Order Granting Plaintiffs' Motion For Relief Re: Valley Fever At Pleasant Valley And Avenal State Prisons*. http://www.cphcs.ca.gov/docs/court/plata/2013-06-24_Doc-2661-Order-Re-Valley-Fever.pdf
- U.S. Environmental Protection Agency (USEPA). 2015 (As of January 30). *The Green Book Nonattainment Areas for Criteria Pollutants*. Washington D.C.: USEPA. <http://www.epa.gov/oar/oaqps/greenbk/index.html>.
- Western Regional Climate Center (WRCC). 2015a (February 17, last accessed). *Average Wind Speeds by State*. Reno, NV: WRCC. <http://www.wrcc.dri.edu/htmlfiles/westwind.final.html#CALIFORNIA>.
- . 2015b (February 17, last accessed). *Average Wind Direction by State*. Reno, NV: WRCC. <http://www.wrcc.dri.edu/htmlfiles/westwinddir.html#CALIFORNIA>

———. 2013. Period of Record Monthly Climate Summary, Lancaster FSS, California (044749).
Reno, NV: WRCC. <http://www.wrcc.dri.edu/cgi-bin/cliMAIN.pl?calanc+sca>.

4.3 **BIOLOGICAL RESOURCES**

This section evaluates the potential biological resources impacts associated with the proposed Project. BonTerra Psomas biologists conducted reconnaissance surveys at the Project site on November 21, 2013 and February 3, 2015. The initial scope of the biological survey was determined through desktop review of the site; a review of the California Department of Fish and Wildlife's (CDFW's) California Natural Diversity Database (CNDDDB) and the California Native Plant Society's (CNPS') Electronic Inventory of Rare and Endangered Vascular Plants of California (2014); and knowledge of the region. The field reconnaissance survey focused on a two primary objectives, including (1) general and special status wildlife and plant habitat assessment survey and (2) assessments of potential areas of "waters of the US", including wetlands (under U.S. Army Corps of Engineers [USACE] jurisdiction), stream/lakes (including riparian vegetation under CDFW jurisdiction), and State waters (under Regional Water Quality Control Board [RWQCB] jurisdiction).

All species observed were recorded in field notes. Plant species were identified in the field or collected for subsequent identification using keys in keys in Baldwin et al. (2012). Taxonomy follows Baldwin et al. (2012) and current scientific data (e.g., scientific journals) for scientific and common names. Vegetation was not mapped during the survey due to limited vegetation present in the survey area. Active searches for reptiles and amphibians included lifting, overturning, and carefully replacing rocks and debris. Birds were identified using visual and auditory recognition. Surveys for mammals were conducted during the day and included searching for and identifying diagnostic signs, including scat, footprints, scratch-outs, dust bowls, burrows, and trails. Taxonomy and nomenclature for wildlife generally follows Stebbins (2012) for amphibians and reptiles, American Ornithologists Union (2014) for birds, and Baker et al. (2003) for mammals.

4.3.1 **RELEVANT PROGRAMS AND REGULATIONS**

Federal

Endangered Species Act

The Federal Endangered Species Act (FESA) of 1973 protects plants and animals that the government has listed as "Endangered" or "Threatened". The FESA is implemented by enforcing Sections 7 and 9 of the Act. A federally listed species is protected from unauthorized "take" pursuant to Section 9 of the FESA. "Take", as defined by the FESA, means to harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or to attempt to engage in any such conduct. All persons are presently prohibited from taking a federally listed species unless and until (1) the appropriate Section 10(a) permit has been issued by the U.S. Fish and Wildlife Service (USFWS) or (2) an Incidental Take Permit is obtained as a result of formal consultation between a federal agency and the USFWS pursuant to Section 7 of the FESA and the implementing regulations that pertain to it (*Code of Federal Regulations* [CFR], Title 50, Section 402). "Person" is defined in the FESA as an individual, corporation, partnership, trust, association, or any private entity; any officer, employee, agent, department or instrument of the federal government; any State, Municipality, or political subdivision of the State; or any other entity subject to the jurisdiction of the U.S. The Project Applicant is a "person" for purposes of the FESA.

Migratory Bird Treaty Act

The Migratory Bird Treaty Act (MBTA) of 1918 may have originally been intended to reduce hunting of migratory birds, but has been interpreted more broadly by some resource agencies in recent years. The broader interpretation is that bird nests containing eggs or young are protected under the MBTA from any disturbance that may directly or indirectly affect the success of the

nesting attempt regardless of the intent of the activity which caused the disturbance. Although federal agencies have not enforced this interpretation, some State and local agencies have referred to it as a reason to require avoidance measures as part of project approval permits.

Section 401 and 404 of the Clean Water Act of 1972 (33 United States Code 1251 et seq.)

Section 404 of the Clean Water Act (CWA) regulates the discharge of dredge and fill material into "Waters of the U.S." including wetlands. Dredge and fill activities are typically associated with development projects; water-resource related projects; infrastructure development and wetland conversion to farming; forestry; and urban development. The U.S. Army Corps of Engineers (USACE) is the designated regulatory agency responsible for administering the 404 permit program and for making jurisdictional determinations.

Under Section 401 of the CWA, an activity requiring a USACE Section 404 permit must obtain a State Water Quality Certification (or waiver thereof) to ensure that the activity will not violate established State water quality standards. The State Water Resources Control Board (SWRCB), in conjunction with the nine California Regional Water Quality Control Boards (RWQCBs), is responsible for administering the Section 401 water quality certification program.

Under Section 401 of the federal CWA, an activity involving discharge into a water body must obtain a federal permit and a State Water Quality Certification to ensure that the activity will not violate established water quality standards. The U.S. Environmental Protection Agency (USEPA) is the federal regulatory agency responsible for implementing the CWA. However, it is the SWRCB in conjunction with the nine RWQCBs who essentially have been delegated the responsibility for administering the water quality certification (401) program.

State

California Endangered Species Act

Pursuant to the California Endangered Species Act (CESA) and Section 2081 of the *California Fish and Game Code*, an incidental take permit from the CDFW is required for projects that could result in the take of a State-listed Threatened or Endangered species. Under the CESA, a "take" is defined as an activity that would directly or indirectly kill an individual of a species, but the definition does not include "harm" or "harass", as the federal act does. As a result, the criteria for a take under the CESA is less strict than that under the FESA. A CDFW-authorized Incidental Take Permit under Section 2081(b) is required when a project could result in the take of a State-listed Threatened or Endangered Species. The application for an Incidental Take Permit under Section 2081(b) has a number of requirements, including the preparation of a conservation plan, generally referred to as a Habitat Conservation Plan.

California Fish and Game Code

Section 1802

State law confers upon the CDFW the trustee responsibility and authority for the public trust resource of wildlife in California. The CDFW may play various roles under the CEQA process. By State law, the CDFW has jurisdiction over the conservation, protection, and management of the wildlife, native plants, and habitat necessary to maintain biologically sustainable populations. The CDFW shall consult with lead and responsible agencies and shall provide the requisite biological expertise to review and comment upon environmental documents and impacts arising from project activities.

As a trustee agency, the CDFW has jurisdiction over certain resources held in trust for the people of California. Trustee agencies are generally required to be notified of CEQA documents relevant to their jurisdiction, whether or not these agencies have actual permitting authority or approval power over aspects of the underlying project (*California Code of Regulations* [CCR], Title 14, Section 15386). The CDFW, as a trustee agency, must be notified of CEQA documents regarding projects involving fish and wildlife of the state as well as Rare and Endangered native plants, wildlife areas, and ecological reserves. Although, as a trustee agency, the CDFW cannot approve or disapprove a project, lead and responsible agencies are required to consult with them. The CDFW, as the trustee agency for fish and wildlife resources, shall provide the requisite biological expertise to review and comment upon environmental documents and impacts arising from project activities and shall make recommendations regarding those resources held in trust for the people of California (*California Fish and Game Code*, Section 1802).

Sections 3503, 3503.5, and 3513

Nesting birds are protected in Sections 3503, 3503.5, and 3513 of the *California Fish and Game Code*. These sections state that it is unlawful to take, possess, or needlessly destroy the nest or eggs of any bird, except as otherwise provided by or any regulation made pursuant to this code. Section 3503.5 explicitly provides protection for all birds of prey, including their eggs and nests. Section 3513 makes it unlawful to take or possess any migratory non-game bird as designated in the MBTA.

Sections 1600–1616

All diversions, obstructions, or changes to the natural flow or bed, channel, or bank of any river, stream, or lake in California that support wildlife resources and/or riparian vegetation are subject to CDFG regulations, pursuant to Section 1600 through Section 1603 of the California Fish and Game Code. Under Section 1602, it is unlawful for any person to substantially divert or obstruct the natural flow or substantially change the bed, channel or bank of any river, stream, or lake designated by CDFG as waters within their jurisdiction, nor can a person use any material from streambeds without first notifying the CDFG of such activity. For a project that may affect stream channels and/or riparian vegetation regulated under Sections 1600 through 1603, CDFG authorization is required in the form of a Streambed Alteration Agreement.

California Porter-Cologne Water Quality Control Act

Pursuant to the California Porter-Cologne Water Quality Control Act, the SWRCB and the nine RWQCBs may require permits (known as waste discharge requirements or WDRs) for the fill or alteration of the waters of the State. The term “Waters of the State” is defined as “any surface water or groundwater, including saline waters, within the boundaries of the state” (California Water Code, Section 13050[e]). The State and Regional Boards have interpreted their authority to require WDRs to extend to any proposal to fill or alter “Waters of the State”, even if those same waters are not under USACE jurisdiction. Pursuant to this authority, the State and Regional Boards may require the submission of a “report of waste discharge” under Section 13260, which is treated as an application for WDRs.

Regional

County of Los Angeles Tree Ordinance

Within Los Angeles County, the County of Los Angeles Tree Ordinance (Ordinance No. 22.56.16) stipulates that a person shall not cut, destroy, remove, relocate, inflict damage, or encroach into the protected zone of any tree of the oak tree genus that is 8 inches or more in diameter 4½ feet

above mean natural grade or, in the case of oaks with multiple trunks, a combined diameter of 12 inches or more of the 2 largest trunks, without first obtaining a permit.

West Mojave Plan/Amendment to the California Desert Conservation Area Plan

The West Mojave Plan area covers 9.3 million acres in Inyo, Kern, Los Angeles, and San Bernardino Counties. It includes 28 participating agencies and jurisdictions including the USFWS, the Bureau of Land Management (BLM), the CDFW, the California Department of Transportation (Caltrans), 4 counties, 11 cities, the Indian Wells Valley Water District, and 5 military installations. The Plan has been approved and adopted by applicable federal agencies. However, State and local agencies did not adopt the habitat conservation plan proposed in the West Mojave Plan to cover their jurisdictions, and therefore the adopted plan only applies to federal public lands.

4.3.2 EXISTING CONDITIONS

Natural Setting

The Project site is situated on the western limits of the majority of the commercial and residential development associated with the City of Lancaster. Residential development occurs generally to the south and east of the Project site. There are no substantial industrial or manufacturing land uses in the Project vicinity except for the Antelope Substation (which is located approximately 3.5 miles to the southeast of the Project site) and William J. Fox Airport (located approximately 2.5 miles to the northeast of the Project site). The Project site boundaries and immediately surrounding land uses are depicted in Exhibit 2-2, Aerial Photograph of Land Uses. The approximate 355 acres of County-owned property includes various facilities, including the MLDC; the former High Desert Health System Multi-Ambulatory Care Center (HDHS MACC); a County-operated solar energy facility; the County Probation Department's Challenger Memorial Youth Center (CMYC); and the County Animal Care and Control – Lancaster Shelter. Transmission towers and their associated access roads span the open spaces to the north and west. The foothills of the Angeles National Forest lie approximately five miles south of the Project site. Habitat types found in the region generally include disturbed, native desert scrub vegetation and agricultural fields.

The Project site is located in the northwestern portion of the U.S. Geological Survey's (USGS') Lancaster West 7.5-minute quadrangle map. The eight surrounding USGS quadrangles, centered on the Lancaster West quadrangle include the Lancaster East, Palmdale, Ritter Ridge, Sleepy Valley, Del Sur, Little Buttes, Rosamond, and Rosamond Lake quadrangles. Topography on the Project site consists of flat ground. Elevation on the Project site is approximately 2,350 feet above mean sea level (msl).

Vegetation

The existing vegetation on the Project site is dominated by ornamental non-native trees and shrubs and generally occurs in association with the landscaped lawns scattered throughout the site. Non-native ornamental turf grass comprises the lawns, which are located throughout the site adjacent to the various facility buildings. Non-native ornamental trees found on site include pine trees (*Pinus* sp.) and Chinese elm (*Ulmus parvifolia*). Shrub species include ficus (*Ficus* sp.), and oleander (*Nerium oleander*).

The proposed Project includes undeveloped portions of the existing site, namely along southeastern perimeter. Although this area is currently undeveloped, it occurs within approximately 100 feet of an existing roadway and consists largely of ruderal weedy species such as Russian thistle (*Salsola tragus*). No native habitat was observed on site.

Wildlife

Wildlife species observed or expected to occur on the Project site are discussed below. There are no drainages or ephemeral ponds present on the Project site; therefore, no fish or amphibian species are expected to occur.

Reptiles

Reptilian diversity and abundance typically varies with vegetation type and character. Many species prefer only one or two vegetation types; however, most species will forage in a variety of habitats. Most reptile species that occur in open areas use rodent burrows for cover, protection from predators, and refuge during extreme weather conditions.

No reptile species were observed during the survey. The Project site provides suitable habitat for common reptile species, including western fence lizard (*Sceloporus occidentalis*) and side-blotched lizard (*Uta stansburiana*), especially in the undeveloped portion of the Project site. Other species that may occur include western whiptail (*Aspidoscelis tigris*) and gopher snake (*Pituophis catenifer*).

Birds

The non-native grassland vegetation and disturbed areas on the Project site provide low quality habitat for most bird species. Four bird species were observed during the surveys: rock pigeon (*Columba livia*), house finch (*Haemorhous mexicanus*), European starling (*Sturnus vulgaris*), and common raven (*Corvus corax*). Common species in the region that are expected to occur on the Project site include mourning dove (*Zenaida macroura*), northern mockingbird (*Mimus polyglottos*), lesser goldfinch (*Spinus psaltria*), and house sparrow (*Passer domesticus*).

Mammals

Although no mammal species were observed on the site during the survey, several common species such as deer mouse (*Peromyscus maniculatus*), Botta's pocket gopher (*Thomomys bottae*), and desert cottontail (*Sylvilagus audubonii*) are expected to occur. Other species that may occur include black-tailed jackrabbit (*Lepus californicus*) and white-tailed antelope squirrel (*Ammospermophilus leucurus*). The only large mammal species expected to occur on the site is coyote (*Canis latrans*).

Bats occur throughout most of Southern California and may use the Project site as foraging habitat during the breeding season. Most of the bats that could potentially occur on the site are inactive during the winter because, depending on the species, they either hibernate or migrate to an off-site location. Several bat species may occur on the Project site for foraging or roosting, including big brown bat (*Eptesicus fuscus*), western pipistrelle (*Pipistrellus hesperus*), and California myotis (*Myotis californicus*).

Wildlife Movement

Wildlife corridors link together areas of suitable wildlife habitat that are otherwise separated by rugged terrain, changes in vegetation, or human disturbance. The fragmentation of large, open space areas that is caused by urbanization creates isolated "islands" of wildlife habitat. In the absence of habitat linkages that allow movement to adjoining open space areas, various studies have concluded that some wildlife species, especially the larger and more mobile mammals, will not likely persist over time in fragmented or isolated habitat areas because this prohibits the infusion of new individuals and genetic information into the local population (MacArthur and

Wilson 1967; Soule 1987; Harris and Gallagher 1989; Bennett 1990). Corridors mitigate the effects of this fragmentation by (1) allowing animals to move between remaining habitats, thereby permitting depleted populations to replenish and promoting genetic exchange; (2) providing escape routes from fire, predators, and human disturbances, reducing the risk that catastrophic events (e.g., fire, disease) will result in population or local species extinction; and (3) serving as travel routes to facilitate movement of individual animals within their home ranges in search of food, water, mates, and other necessary resources (Noss 1983; Fahrig and Merriam 1985; Simberloff and Cox 1987; Harris and Gallagher 1989).

Wildlife movement activities usually fall into one of three movement categories: (1) dispersal (e.g., juvenile animals from natal areas, individuals extending range distributions); (2) seasonal migration; and (3) movements related to home range activities (e.g., foraging for food or water, defending territories, or searching for mates, breeding areas, or cover). A number of terms such as "wildlife corridor", "travel route", "habitat linkage", and "wildlife crossing" have been used in various wildlife movement studies to refer to areas where wildlife move from one area to another.

In a large open space area where there are few or no man-made or naturally occurring physical constraints to wildlife movement, wildlife corridors may not yet exist. Given an open space area that is large enough to both maintain viable populations of species and also to provide a variety of travel routes (e.g., canyons, ridgelines, trails, riverbeds, and others), wildlife will use these "local" routes while searching for food, water, shelter, and mates and will not need to cross into other large open space areas. Depending on expanse, location, vegetative composition and food availability, some of these movement areas (e.g., large drainages and canyons) are used more extensively as source areas for food, water, and cover, particularly by small- and medium-sized animals. Once open space areas become constrained and/or fragmented, often as a result of urban development or construction of physical obstacles (e.g., roads and highways), the remaining landscape features or travel routes can connect the larger open space areas. These connecting travel routes can provide wildlife corridors as long as they provide adequate space, cover, food, and water and do not contain obstacles or distractions (e.g., man-made noise, lighting) that would generally hinder wildlife movement.

Special Status Plants

Due to the developed/disturbed nature of the Project site, ongoing maintenance of landscaped areas, and the lack of native habitats, special status plant species are not expected to occur on site.

Special Status Wildlife

Special status wildlife species were evaluated based on a number of factors, including (1) species identified by the CNDDDB as occurring (either currently or historically) on the Project site or in the vicinity of the Project region and (2) any other special status wildlife that is known to occur in the Project region. Table 4.3-1 provides a list of special status wildlife potentially occurring in the region, and evaluated for the Project site. No special status wildlife species are expected to occur on site due to lack of potentially suitable habitat.

**TABLE 4.3-1
SPECIAL STATUS WILDLIFE SPECIES
KNOWN TO OCCUR IN THE PROJECT VICINITY**

Species	Status	Likelihood to Occur on the Project Site	
Reptiles			
<i>Gopherus agassizii</i> desert tortoise	FT, ST	Not expected to occur; no potentially suitable habitat.	
<i>Phrynosoma blainvillii</i> coast horned lizard	SSC	Not expected to occur; no potentially suitable habitat.	
<i>Anniella pulchra pulchra</i> silvery legless lizard	SSC	Not expected to occur; no potentially suitable habitat.	
Birds			
<i>Buteo swainsoni</i> Swainson's hawk	ST	Not expected to occur; no potentially suitable habitat.	
<i>Circus cyaneus</i> northern harrier	SSC	Not expected to occur; no potentially suitable habitat.	
<i>Charadrius alexandrinus nivosus</i> western snowy plover	FT, SSC	Not expected to occur; no potentially suitable habitat.	
<i>Charadrius montanus</i> mountain plover	SSC	Not expected to occur; no potentially suitable habitat.	
<i>Athene cucularia</i> burrowing owl	SSC	Not expected to occur; no potentially suitable habitat.	
<i>Asio otus</i> long-eared owl	SSC	Not expected to occur; no potentially suitable habitat.	
<i>Asio flammeus</i> short-eared owl	SSC	Not expected to occur; no potentially suitable habitat.	
<i>Lanius ludovicianus</i> loggerhead shrike	SSC	Not expected to occur; no potentially suitable habitat.	
<i>Toxostoma lecontei</i> Le Conte's thrasher	SSC	Not expected to occur; no potentially suitable habitat.	
<i>Agelaius tricolor</i> tricolored blackbird	SSC	Not expected to occur; no potentially suitable habitat.	
<i>Xanthocephalus xanthocephalus</i> yellow-headed blackbird	SSC	Not expected to occur; no potentially suitable habitat.	
Mammals			
<i>Antrozous pallidus</i> pallid bat	SSC	Not expected to occur; no potentially suitable habitat.	
<i>Corynorhinus townsendii</i> Townsend's big-eared bat	SSC	Not expected to occur; no potentially suitable habitat.	
<i>Xerospermophilus mohavensis</i> Mohave ground squirrel	ST	Not expected to occur; no potentially suitable habitat.	
<i>Taxidea taxus</i> American badger	SSC	Not expected to occur; no potentially suitable habitat.	
USFWS: U.S. Fish and Wildlife Service; CDFW: California Department of Fish and Wildlife			
LEGEND:			
Federal (USFWS)		State (CDFW)	
FT	Threatened	ST	Threatened
SSC	Species of Special Concern		

Jurisdictional Wetlands and Waters

As previously described, the field reconnaissance survey included an assessment for potential “waters of the US”, including wetlands (under U.S. Army Corps of Engineers [USACE] jurisdiction), stream/lakes (including riparian vegetation under CDFW jurisdiction), and State waters (under Regional Water Quality Control Board [RWQCB] jurisdiction). Results of the assessment identified two potentially jurisdictional features located off-site. One feature is located on the west side of the Project site within the roadway shoulder of 60th Street West. Although the feature appears to convey water during storm events, after very short distances the mild swale dissipates and water is expected to sheet flow onto the Project site without connecting to any other discernable conveyance feature. Resource agencies are, therefore, unlikely to claim jurisdiction and regulate impacts to this feature.

The second potentially jurisdictional feature identified occurs off-site between the north edge of the site boundary and the roadway shoulder on the south side of West Avenue I. This feature becomes discernable about 50 feet east of 60th Street West as a mild, sandy bottom swale and continues to the east with evidence of scouring becoming increasingly evident. The feature passes through pipe culverts at two locations where paved driveways cross the feature providing access for the County-owned property. Due to the lack of connectivity with navigable waters, the USACE is not expected to regulate this feature. However, the CDFW and the RWQCB may claim jurisdiction to this feature.

4.3.3 THRESHOLDS OF SIGNIFICANCE

The following significance criteria are derived from the State CEQA Guidelines. A project would result in a significant adverse impact related to Biological Resources if it would:

Threshold 4.3a: Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the CDFW or USFWS.

Threshold 4.3b: Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the CDFW or USFWS.

Threshold 4.3c: Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means.

Threshold 4.3d: Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites.

Threshold 4.3e: Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.

Threshold 4.3f: Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan.

4.3.4 REGULATORY REQUIREMENT

Applicable regulations are incorporated into Mitigation Measures in Section 4.3.7 below.

4.3.5 ENVIRONMENTAL IMPACT ANALYSIS

Threshold 4.3a: Would the project have a substantial adverse effect, either directly or through habitat modification, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

Short-Term and Long-Term Impacts

As discussed above and shown above in Table 4.3-1, which provides a list of special status wildlife potentially occurring in the region, no special status wildlife species are expected to occur on site due to lack of potentially suitable habitat. Based on the findings of the reconnaissance surveys conducted at the Project site on November 21, 2013 and February 3, 2015, it was determined that due to the developed nature of the Project site, it does not provide habitat for any of the special status plant species known to occur in the region, and no further focused surveys were warranted. Therefore, there would be no impacts and no mitigation is required.

Threshold 4.3b: Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the CDFW or USFWS?

Short-Term and Long-Term Impacts

No riparian habitats or other special-status vegetation types occur on or immediately adjacent to the Project site. Therefore, Project implementation will have no direct or indirect impact on special-status vegetation types.

Threshold 4.3c: Would the project have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

Short-Term and Long-Term Impacts

On-site Impacts

No jurisdictional drainage features occur on the Project site. Therefore, MLWDC implementation will have no direct impact on jurisdictional drainage features within the Project site and no mitigation is required.

Off-site Impacts

Two drainage features that may be considered jurisdictional waters by the CDFW and/or the RWQCB were identified in an off-site potential disturbance area, as described in Section 4.3.2 above. These jurisdictional features may be regulated through California Fish and Game Code and the Clean Water Act and both short-term and long-term impacts to them would be considered potentially significant. If MLWDC implementation, including potential trenching for the water line

connection (temporary) and/or construction of a storm drain outlet (permanent), would result in discharge to either of these features, permits from these agencies may be required prior to Project implementation. MM BIO-3 requires the County to consult with the CDFW and the RWQCB to determine if the agency will consider the drainage feature to be within their jurisdiction and require regulatory permits. If an agency indicates that the feature will not be regulated and no permit is required, no further action will be required for that agency. If an agency indicates that the feature will be regulated and permits are required, the County must obtain all necessary permits for impacts to the CDFW and the RWQCB jurisdictional areas. Mitigation for the loss of jurisdictional resources shall be negotiated with the resource agencies and must include one or more of the following: (1) payment to a mitigation bank or regional riparian enhancement program (e.g., invasive plant or wildlife species removal) and/or (2) restoration of riparian habitat either on site or off site at a ratio of no less than 1:1, determined through consultation with the above-listed resource agencies. If in-lieu mitigation fees are required, prior to the initiation of any construction-related activities, the LACFCD shall pay the in-lieu mitigation fee to a mitigation bank/enhancement program for the in-kind (equivalent vegetation type and acreage) replacement of impacted jurisdictional resources. Implementation of MM BIO-3 would reduce potentially significant impacts to levels less than significant.

Threshold 4.3d: Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

Short-Term Construction Impacts

The Project site is highly developed consisting of buildings/structures, paved roadways, utilities, and other various associated development. In addition, the central portion of the MLDC that would house inmates is entirely enclosed by high security fences that do not allow for passage into or out of the MLDC except within secured gated areas. The Project site does not represent an important regional movement corridor, and few wildlife species are expected to use the site. Extremely limited local movement of common wildlife species through unfenced parking areas or landscaped areas of the site may occur for foraging and dispersal. The Project's short term construction impacts would not have an impact on any regional wildlife movement; therefore, no mitigation is required.

Bat maternity roosts (where bats give birth and nurse their young) of any species may be considered native wildlife nursery sites. Common bat species such as California myotis form maternity colonies in places such as crevices of old snags, crevices of trees, bridges, and buildings. Impacts to such breeding colonies could potentially cause a decline in regional population. The Project's short-term construction impacts may result in the removal/demolition of potentially occupied bat maternity roosts. Consequently, construction-related impacts would be considered adverse and may result in a potentially significant impact. MM BIO-1, which calls for pre-construction bat surveys and bat exclusion, would reduce the impact from potentially significant to less than significant.

Nesting birds are protected under the provisions of the MBTA, and the Project must be constructed in accordance with the law (RR BIO-1). The USFWS periodically publishes the list of migratory birds covered by the provisions of this statute, but essentially all naturally occurring bird species in North America are considered to be migratory and included on the list. Suitable nesting habitat for migratory birds is present in mature trees and other structures on the Project site and in its adjacent areas and could be adversely impacted either directly or indirectly during the Project's short-term construction impacts. The loss of an active nest may be considered a violation of the MBTA and the *California Fish and Game Code* protecting nesting birds; therefore,

MM BIO-2, requiring seasonal avoidance or pre-construction surveys for nesting birds, is required to reduce these potentially significant impacts to a level considered less than significant.

Long-Term Operational Impacts

The Project's long-term operational impacts would not substantially interfere with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, nor would it impede the use of native wildlife nursery sites. Therefore, no mitigation is required.

Threshold 4.3e: Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

Short-Term and Long-Term Impacts

The Project site is located 7.1 miles southwest of an existing SEA and 4.2 miles from the proposed Antelope Valley SEA (LACDRP 2014a, 2014b). SEAs are components of the Los Angeles General Plan Conservation/Open Space Element that have additional development restrictions and requirements for additional County review. The Project would not have any impact on these SEAs due to their distance from the site.

The Los Angeles Code (Title 22, Ch. 22.56, Part 16) contains the Los Angeles County Oak Tree Ordinance; however, no oak trees were detected on the Project site. Therefore, the Project does not conflict with the County ordinance. A General Plan consistency analysis is provided in Section 4.9, Land Use and Planning.

Threshold 4.3f: Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan?

Short-Term and Long-Term Impacts

The Project site is located within the boundaries of the California Desert Conservation Area (CDCA) Plan and the West Mojave Plan, which is an amendment to the CDCA Plan (BLM 1980, 2015). The CDCA Plan provides a plan for the use and enjoyment of California's public desert resources, but only applies to federal public land that is managed by the BLM (Seehafer 2014). The West Mojave Plan is a land use plan amendment to the CDCA Plan and covers 9.3 million acres in the western portion of the Mojave Desert, including parts of Los Angeles, Kern, Inyo, and San Bernardino Counties. The purpose of the West Mojave Plan is to develop management strategies for the desert tortoise (*Gopherus agassizii*), Mohave ground squirrel (*Xerospermophilus mohavensis*), and over 100 other sensitive plants and animals to conserve those species throughout the western Mojave Desert. The Project site is developed and does not support sensitive species proposed for conservation by the CDCA Plan or the West Mojave Plan. The MLWDC Project does not occur on federal lands and is, therefore, not subject to West Mojave Plan requirements. However, the Project is consistent with the goals and strategies of this plan. No conflict with an adopted Habitat Conservation Plan or Natural Community Conservation Plan would occur with the Project, and no mitigation is required.

4.3.6 CUMULATIVE IMPACTS

The cumulative study area for biological resources includes the Antelope Valley area because the flora and fauna of this area is unique within Los Angeles County. The Project site is highly

disturbed and contains only low quality biological resources and does not contain any sensitive wildlife or plant special-status species. Therefore, development on the Project site would cause a negligible increase in regional impacts on biological resources. For these reasons, and with implementation of MM BIO-1, MM BIO-2 and MM BIO-3, the Project would not result in a cumulatively considerable impact to biological resources.

4.3.7 MITIGATION MEASURES

MM BIO-1 Prior to commencement of construction activities, a qualified Biologist shall conduct a pre-construction bat habitat assessment of the trees and/or structures marked for potential removal/demolition. Potential for roosting shall be categorized by (1) potential for solitary roost sites and (2) potential for colonial roost sites (i.e., ten bats or more). If the potential for colonial roosting is determined, those trees/structures shall not be removed during the bat maternity roost season (March 1 to July 31). Trees potentially supporting colonial roosts outside the maternity roost season, and trees potentially supporting solitary roosts, may be removed via a two-step removal process whereby, at the direction of the Biologist, some level of disturbance (such as trimming of lower branches) is applied to the tree on the day prior to removal to allow bats to escape during the darker hours, and the roost tree shall be removed the following day (i.e., there shall be no less or more than one night between initial disturbance and the grading or tree removal). Structures potentially supporting colonial roosts outside the maternity roost season and structures potentially supporting solitary roosts may be fitted with a bat exclusionary device at the entry location, whereby bats are allowed to leave the structure but are unable to return. The structure can be demolished the following day. The results of the pre-construction bat habitat assessment, and any measures taken to protect bats, shall be documented and provided to the Los Angeles County Department of Public Works.

MM BIO-2 The Project shall be conducted in compliance with the conditions set forth in the Migratory Bird Treaty Act (MBTA) and California Fish and Game Code with methods accepted by the U.S. Fish and Wildlife Service (USFWS) and the California Department of Fish and Wildlife (CDFW) to protect active bird/raptor nests. To the extent feasible, vegetation/tree removal shall occur during the non-breeding season for nesting birds (generally late September to early March) and nesting raptors (generally early July to late January) to avoid impacts to nesting birds and raptors. If the nature of the Project requires that work be initiated during the breeding season for nesting birds and raptors (February 1 to August 31), a pre-construction survey shall be conducted by a qualified Biologist (i.e. one with experience conducting nesting bird surveys) for nesting birds and raptors within 3 days prior to clearing of any vegetation and/or any work near existing structures (i.e., within 300 feet for nesting birds, within 300 feet for nesting special status birds, and within 500 feet for nesting raptors). If the Biologist does not find any active nests within or immediately adjacent to the impact area, the vegetation clearing/construction work shall be allowed to proceed. A letter report shall be prepared and submitted to the Los Angeles County Department of Public Works to document the survey findings and recommended protective measures.

If the Biologist finds an active nest within or immediately adjacent to the construction area and determines that the nest may be impacted or breeding activities substantially disrupted, the Biologist shall delineate an appropriate buffer zone around the nest depending on the sensitivity of the species and the nature of

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

MM BIO-3 If MLWDC implementation, including potential off-site trenching for the water line connection (temporary) and/or off-site construction of a storm drain outlet (permanent), would result in discharge to jurisdictional features, the County shall consult with the CDFW and the RWQCB to determine if the agency will consider the feature to be within their jurisdiction and require regulatory permits. If an agency indicates that the feature will not be regulated and no permit is required, no further action will be required for that agency. If an agency indicates that the feature will be regulated and permits are required, the balance of this Mitigation Measure, described below, shall be implemented prior to initiation of Project activities.

Prior to initiation of Project activities, the County shall obtain any necessary permits for impacts to Regional Water Quality Control Board (RWQCB) and CDFW jurisdictional areas. Mitigation for the loss of jurisdictional resources shall be negotiated with the resource agencies during the regulatory permitting process. Potential mitigation options shall include one or more of the following: (1) payment to a mitigation bank or regional riparian enhancement program (e.g., invasive plant or wildlife species removal) and/or (2) restoration of riparian habitat either on site or off site at a ratio of no less than 1:1, determined through consultation with the above-listed resource agencies. If in-lieu mitigation fees are required, prior to the initiation of any construction-related activities, the LACFCD shall pay the in-lieu mitigation fee to a mitigation bank/enhancement program for the in-kind (equivalent vegetation type and acreage) replacement of impacted jurisdictional resources. If a Restoration Program is required, prior to the initiation of any construction-related activities, LACFCD shall prepare and submit a Riparian Habitat Mitigation and Monitoring Program (HMMP) for USACE and CDFW approval. If a Riparian HMMP is required, it shall contain the following items:

- A.** Responsibilities and qualifications of the personnel to implement and supervise the plan. The responsibilities of the Landowner, Specialists, and Maintenance Personnel that would supervise and implement the plan shall be specified.
- B.** Site selection. The mitigation site shall be determined in coordination with the USACE, CDFW, and RWQCB. The site shall either be located in a dedicated open space area on County land, USFS land, or off-site land shall be purchased.

- C. Seed source. Seeds (or plantings) used shall be from local sources (within ten miles of the Project area) to ensure genetic integrity.
- D. Site preparation and planting implementation. Site preparation shall include (1) protection of existing native species; (2) trash and weed removal; (3) native species salvage and reuse (i.e., duff); (4) soil treatments (i.e., imprinting, decompacting); (5) temporary irrigation installation; (6) erosion-control measures (i.e., rice or willow wattles); (7) seed mix application; and (8) container species planting.
- E. Schedule. A schedule shall be developed which includes planting in late fall and early winter, between October 1 and January 30.
- F. Maintenance Plan/Guidelines. The Maintenance Plan shall include (1) weed control; (2) herbivory control; (3) trash removal; (4) irrigation system maintenance; (5) maintenance training; and (6) replacement planting.
- G. Monitoring plan. The Monitoring Plan shall include (1) qualitative monitoring (i.e., photographs and general observations); (2) quantitative monitoring (i.e., randomly placed transects); (3) performance criteria, as approved by the above-listed resource agencies; (4) monthly reports for the first year and reports quarterly thereafter; and (5) annual reports for five years, which shall be submitted to the resource agencies on an annual basis. The site shall be monitored and maintained for five years to ensure successful establishment of riparian habitat within the restored and created areas.
- H. Long-term preservation. Long-term preservation of the site shall also be outlined in the conceptual Mitigation Plan to ensure the mitigation site is not impacted by future development.

4.3.8 LEVEL OF SIGNIFICANCE AFTER MITIGATION

With implementation of MM BIO-1, MM BIO-2 and MM BIO-3, impacts to biological resources resulting from implementation of the Project would be reduced to a less than significant level. No significant unavoidable direct, indirect, or cumulative impacts to biological resources would occur.

4.3.9 REFERENCES

- American Ornithologists' Union (AOU). 2014 (July). *Check-list of North American Birds* (7th ed., as revised through 55th Supplement). Washington, D.C.: AOU. <http://www.bioone.org/doi/pdf/10.1642/AUK-14-124.1>.
- Baldwin, B.G., D.J. Keil, R. Patterson, T.J. Rosatti, and D.H. Wilken (Eds.). 2012. *The Jepson Manual: Vascular Plants of California* (Second ed.). Berkeley, CA: University of California Press.
- Baker, R.J., L.C. Bradley, R.D. Bradley, J.W. Dragoo, M.D. Engstrom, R.S. Hoffmann, C.A. Jones, F. Reid, D.W. Rice, C. Jones. 2003 (December). Revised Checklist of North American Mammals North of Mexico, 2003. *Occasional Papers* (No. 229). Waco, TX: Museum of Texas Tech University.
- Bennett, A.F. 1990. Habitat Corridors and the Conservation of Small Mammals in the Fragmented Forest Environment. *Landscape Ecology* 4(2–3):109–122. New York, NY: International Association for Landscape Ecology.
- Bureau of Land Management (BLM). 2015 (January 15, last updated). *West Mojave (WEMO) Plan Amendment Activity*. Moreno Valley, CA: BLM. http://www.blm.gov/ca/st/en/fo/cdd/west_mojave__wemo.html.
- . 1980. *The California Conservation Desert Area Plan of 1980, as amended*. Moreno Valley, CA: BLM.
- California Department of Fish and Wildlife (CDFW). 2014. California Natural Diversity Database. Records of Occurrence for USGS Lancaster West, Lancaster East, Palmdale, Ritter Ridge, Sleepy Valley, Del Sur, Little Buttes, Rosamond, and Rosamond Lake 7.5-minute quadrangle maps. Sacramento, CA: CDFW, Natural Heritage Division.
- California Native Plant Society (CNPS). 2014. Electronic Inventory of Rare and Endangered Vascular Plants of California. Records of Occurrence for USGS Lancaster West, Lancaster East, Palmdale, Ritter Ridge, Sleepy Valley, Del Sur, Little Buttes, Rosamond, and Rosamond Lake 7.5-minute quadrangle maps. Sacramento, CA: CNPS. <http://www.cnps.org/inventory>.
- Fahrig, L. and G. Merriam. 1985. Habitat Patch Connectivity and Population Survival. *Ecology* 66(6): 1762–1768. Tempe, AZ: Ecological Society of America.
- Harris, L.D. and P.B. Gallagher. 1989. New Initiatives for Wildlife Conservation: The Need for Movement Corridors (pp. 11–34). *Preserving Communities and Corridors* (G. Mackintosh, Ed.). Washington, D.C.: Defenders of Wildlife.
- Los Angeles, County of. 2015 (current through). *Los Angeles County, California – Code of Ordinances*. Tallahassee, FL: Municorp for the County. <https://library.municode.com/index.aspx?clientId=16274>.
- Los Angeles County Department of Regional Planning (LACDRP). 2014a (November). *Draft Antelope Valley Area Plan*. Los Angeles, CA: LACDRP.
- . 2014b (April). *Draft Significant Ecological Areas and Coastal Resource Areas*. Los Angeles, CA: LACDRP.

- MacArthur, R.H. and E.O. Wilson. 1967. *The Theory of Island Biogeography*. Princeton, NJ: Princeton University Press.
- Noss, R.F. 1983. A Regional Landscape Approach to Maintain Diversity. *BioScience*. 33(11): 700–706. Washington, D.C.: American Institute of Biological Sciences.
- Seehafer, E. 2014 (October 31). Personal Communication. Phone Conversation between E. Seehafer (Bureau of Land Management) and Daria Sarraf (BonTerra Psomas).
- Simberloff, D. and J. Cox. 1987. Consequences and Costs of Conservation Corridors. *Conservation Biology* 1(1): 63–71. Boston, MA: Blackwell Scientific Publications.
- Soule, M.E. 1987. *Viable Populations for Conservation*. New York, NY: Cambridge University Press.
- Stebbins, R.C. 2012. *A Field Guide to Western Reptiles and Amphibians* (Revised ed.). Berkeley, CA: University of California Press.

4.4 **CULTURAL RESOURCES**

This section evaluates the potential cultural resources impacts associated with the proposed Project. Information in this section is derived from the Historical Resource Report (HRR) prepared by GPA Consulting in April 2015; a cultural resources records search at the South Central Coastal Information Center; a paleontological resources records search at the Natural History Museum of Los Angeles County; Native American consultation; and a field survey. The findings of the HRR are summarized below, with the complete report provided in Appendix C-1 of this EIR. The findings of the cultural resources records search and paleontological resources records search are provided in Appendix C-2 and letters sent as part of the Native American consultation are provided in Appendix C-3.

4.4.1 **RELEVANT PROGRAMS AND REGULATIONS**

Federal

National Historic Preservation Act

The National Historic Preservation Act (NHPA) of 1966, as amended, calls for the preservation of cultural resources through one of its implementing regulations (36 *Code of Federal Regulations* [CFR] Section 800, Protection of Historic Properties), as well as under the National Environmental Policy Act (NEPA). Properties of traditional religious and cultural importance to Native Americans are protected under Section 101(d)(6)(A) of the NHPA.

Section 106 of the NHPA (16 *United States Code* [USC] Section 470f) requires federal agencies to take into account the effects of their undertakings on any district, site, building, structure, or object that is included in or eligible for inclusion in the National Register of Historic Places (NRHP) and to afford the Advisory Council on Historic Preservation (ACHP) a reasonable opportunity to comment on such undertakings (36 CFR 800.1). Under Section 106, the significance of any adversely affected cultural resource is assessed and mitigation measures are proposed to reduce the impacts to an acceptable level. Significant cultural resources include resources that are listed in or are eligible for listing in the NRHP per the criteria listed at 36 CFR 60.4:

Criteria

To be eligible for listing in the National Register, a property must be at least 50 years of age and possess significance in American history and culture, architecture, or archaeology. The quality of significance in American history, architecture, archaeology, engineering and culture is present in districts, sites, buildings, structures, and objects that possess integrity of location, design, setting, materials, workmanship, feeling, and association and that meet one or more of four established criteria:

- (a) Are associated with events that have made a significant contribution to the broad patterns of our history; or
- (b) Are associated with the lives of persons significant in our past; or
- (c) Embody the distinctive characteristics of a type, period, or method of installation, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or
- (d) Have yielded, or may be likely to yield, information important in prehistory or history.

Physical Integrity

According to National Register Bulletin No. 15, “to be eligible for listing in the National Register, a property must not only be shown to be significant under National Register criteria, but it also must have integrity”. Integrity is defined in National Register Bulletin No. 15 as “the ability of a property to convey its significance”. Within the concept of integrity, the NRHP recognizes seven aspects or qualities that, in various combinations, define “integrity”. They are feeling, association, workmanship, location, design, setting, and materials, and they are defined by National Register Bulletin No. 15 as follows:

- Location is the place where the historic property was constructed or the place where the historic event occurred.
- Design is the combination of elements that create the form, plan, space, structure, and style of a property.
- Setting is the physical environment of a historic property.
- Materials are the physical elements that were combined or deposited during a particular period of time and in a particular pattern or configuration to form a historic property.
- Workmanship is the physical evidence of the crafts of a particular culture or people during any given period in history or prehistory.
- Feeling is a property's expression of the aesthetic or historic sense of a particular period of time.
- Association is the direct link between an important historic event or person and a historic property.

Context

To be eligible for listing in the NRHP, a property must also be significant within a historic context. National Register Bulletin No. 15 states that the significance of a historic property can be judged only when it is evaluated in its historic context. Historic contexts are “those patterns, themes, or trends in history by which a specific . . . property or site is understood and its meaning . . . is made clear”. A property must represent an important aspect of the area's history or prehistory and possess the requisite integrity to qualify for the NRHP.

Historic Districts

The NRHP includes significant properties, which are classified as buildings, sites, districts, structures, or objects. A historic district “derives its importance from being a unified entity, even though it is often composed of a variety of resources. The identity of a district results from the interrelationship of its resources, which can be an arrangement of historically or functionally related properties”.

A district is defined as a geographically definable area of land containing a significant concentration of buildings, sites, structures, or objects united by past events or aesthetically by plan or physical development. A district's significance and historic integrity should help determine the boundaries. Other factors include:

- Visual barriers that mark a change in the historic character of the area or that break the continuity of the district, such as new construction, highways, or development of a different character;

- Visual changes in the character of the area due to different architectural styles, types, or periods, or to a decline in the concentration of contributing resources;
- Boundaries at a specific time in history, such as the original city limits or the legally recorded boundaries of a housing subdivision, estate, or ranch; and
- Clearly differentiated patterns of historical development, such as commercial versus residential or industrial.

Within historic districts, properties are identified as contributing and noncontributing. A contributing building, site, structure, or object adds to the historic associations, historic architectural qualities, or archeological values for which a district is significant because:

- It was present during the period of significance, relates to the significance of the district, and retains its physical integrity or
- It independently meets the criterion for listing in the NRHP.

Secretary of the Interior's Standards

The Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, and Reconstructing Historic Buildings or the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings (Secretary of the Interior's Standards) assist in the preservation of a property's historical significance by preserving historic materials and features of historic buildings of all materials, construction types, sizes, and occupancy. The standards include preservation of exterior and interior building components, related landscape features, and the building's site and environment, as well as the compatibility of attached, adjacent, or related new construction. Implementation of these "standards" is identified in Section 15064.5(b)(3) of the State CEQA Guidelines as generally resulting in the reduction of an impact on an identified historic resource to a less than significant level.

State

California Register of Historical Resources

The Office of Historic Preservation (OHP) administers the California Register of Historical Resources (CRHR), which was established in 1992 through Sections 5020 et seq. of the *California Public Resources Code* (PRC) to be "an authoritative guide in California to be used by State and local agencies, private groups, and citizens to identify the State's historical resources and to indicate what properties are to be protected, to the extent prudent and feasible, from substantial adverse change" (PRC Section 5024.1[a]).

The CRHR listing criteria focus on resources of State, rather than national, significance. The CRHR includes the following types of resources, either as an individual property or a contributor to a historic district: (1) properties listed in or determined eligible for listing in the NRHP (automatically included); (2) California Historical Landmarks numbered 770 and higher (automatically included); (3) California Points of Historical Interest recommended for listing by the OHP; and (4) resources nominated for listing and determined eligible by meeting one or more of the CRHR criteria.

The CRHR consists of properties that are listed automatically, as well as those that must be nominated through an application and public hearing process. The CRHR automatically includes the following:

- California properties listed in the NRHP and those formally Determined Eligible for the NRHP;
- California Registered Historical Landmarks from No. 0770 onward; and
- Those California Points of Historical Interest that have been evaluated by the OHP and have been recommended to the State Historical Resources Commission for inclusion on the CRHR.

The criteria for listing resources in the CRHR, which were expressly developed to be in accordance with previously established criteria developed for listing in the NRHP (per the criteria listed at 36 CFR 60.4), are stated below.

The quality of significance in American history, architecture, archaeology, engineering and culture is present in districts, sites, buildings, structures, and objects that possess integrity of location, design, setting, materials, workmanship, feeling and association and that:

- (1) Are associated with events that have made a significant contribution to the broad patterns of local or regional history or the cultural heritage of California or the United States; or
- (2) Are associated with the lives of persons important to local, California, or national history; or
- (3) Embody the distinctive characteristics of a type, period, region, or method of construction, or that represent the work of a master, or that possess high artistic values; or
- (4) Have yielded, or have the potential to yield, information important to the prehistory or history of the local area, California or the nation.

Historic resources eligible for listing in the California Register may include buildings, sites, structures, objects, and historic districts. The minimum age criterion for the CRHR is generally 50 years. Under the Special Considerations provided in the California Code of Regulations (Title 14, Division 3, Chapter 11.5, 4852[d][2]), resources less than 50 years old may be eligible for listing if "it can be demonstrated that sufficient time has passed to understand its historical importance". Once listed, the historical resource is protected from any detrimental changes and any alterations, repairs, and additions must be reviewed and approved by the State Historical Resources Commission (SHRC) under the State Historical Building Code to ensure that the quality of the resource remains intact.

California Environmental Quality Act

Section 15064.5 of the California Environmental Quality Act (CEQA) Guidelines requires a Lead Agency to determine whether a project would have a significant effect on one or more historical resources. A "historical resource" is defined as a resource listed in or determined to be eligible for listing in the CRHR (PRC 21084.1); a resource included in a local register of historical resources (14 *California Code of Regulations* [CCR] Section 15064.5[a][2]); or any object, building, structure, site, area, place, record, or manuscript that a Lead Agency determines to be historically significant (14 CCR 15064.5[a][3]). The definitions of "historic" for CEQA purposes have been

summarized by the California appellate courts as including mandatory, presumptive and discretionary categories.

Projects that affect the historical significance of a resource that is listed in or has been formally determined eligible for listing in the CRHR are considered to have a significant effect on the environment. Impacts to cultural resources from a project are thus considered significant and adverse under Section 15064.5 (b) of the CEQA Guidelines if the project (1) physically destroys, demolishes, relocates, or alters the resource or its immediate surroundings; or (2) materially impairs, demolishes or alters the physical characteristics of an historical resources that convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the California Register of Historical Resources; its inclusion in a local register of historical resources; its identification in an historical resources survey; or its eligibility for inclusion in the California Register of Historical Resources as determined by a lead agency for purposes of CEQA.

Discovery of Human Remains

Section 7050.5 of the *California Health and Safety Code* provides for the disposition of accidentally discovered human remains. Section 7050.5 states that, if human remains are found, no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains shall occur until the County Coroner has determined the appropriate treatment and disposition of the human remains.

Section 5097.98 of the PRC states that, if the remains are determined by the Coroner to be of Native American origin, the Coroner must notify the NAHC within 24 hours which, in turn, must identify the person or persons it believes to be the most likely descendant (MLD) from the deceased Native American. The MLD shall complete his/her inspection and make a recommendation within 48 hours of being granted access to the site. The MLD's recommendation shall be followed if feasible, and may include scientific removal and non-destructive analysis of the human remains and any items associated with Native American burials. If the landowner rejects the MLD's recommendations, the landowner shall rebury the remains with appropriate dignity on the property in a location that will not be subject to further subsurface disturbance (*California Public Resources Code*, Section 5097.98).

Local

Lancaster General Plan

The Project site is located in the City of Lancaster but is owned by the County and, thus, is not subject to the City of Lancaster's land use regulations. The discussion of the Lancaster General Plan is for informational purposes only, as it includes a Plan for Active Living that addresses historical, archaeological, and cultural resources in the area. The Lancaster General Plan states that the City has a rich cultural history but few historical structures remain. Areas adjacent to the foothills and along washes may contain cultural artifacts, and archaeological investigations are important prior to development, along with the preservation of historic buildings. The Master Environmental Assessment for the General Plan lists six buildings designated or eligible for listing on the NRHP. These do not include buildings on the Project site. However, it states that the Polaris War Eagle Flight Academy is designated as a Historic California Post by the California State Military Museum.

4.4.2 EXISTING CONDITIONS

Prehistoric Background

Chronologies that generally describe the sequence of the later prehistoric periods of Southern California are discussed below.

Horizon I: Early Man or Paleo-Indian Period (11,000 BCE¹ to 7,500 BCE). While Wallace (1955) initially termed this period the Early Man Horizon (I), this early stage of human occupation is commonly referred to as the Paleo-Indian Period today (Chartkoff and Chartkoff 1984:24). The precise start of this period is still a topic of considerable debate. At inland archaeological sites, the surviving material culture of this period is primarily lithic, consisting of large, extremely well made stone projectile points and tools such as scrapers and choppers. Encampments were probably temporary, located near major kills or important resource areas.

Horizon II: Milling Stone Assemblages (7,500 BCE to 1,000 BCE). Encompassing a broad expanse of time, the Milling Stone Period was named for the abundant milling stone tools associated with sites of this period. These tools, the mano and metate, were used to process small, hard seeds from plants associated with shrub-scrub vegetation communities. An annual round of seasonal migrations was likely practiced, with movements coinciding with ripening vegetal resources and the periods of maximal availability of various animal resources. Along the coast, shell midden sites are common site types. Some formal burials, occasionally with associated grave goods, are also evident. This period of time is roughly equivalent to Warren's (1968) Encinitas Tradition. Warren suggests that, as milling stones are common and projectile points are comparatively rare during this period of time, hunting was less important than the gathering of vegetal resources.

More recent studies by Koerper and Drover (1983) and Koerper (1981) suggest that a diversity of subsistence activities, including hunting of various game animals, was practiced during this period. At present, little is known about cultural change during this time period in Southern California. While this lack of noticeable change gives the appearance of cultural stasis, almost certainly many regional and temporal cultural shifts did occur. Future research that is focused on temporal change in the Milling Stone Period would greatly benefit the current understanding of Southern California prehistory.

Horizon III: Intermediate Cultures (1,000 BCE to 750 CE²). The Intermediate Period is identified by a mixed strategy of plant exploitation, terrestrial hunting, and maritime subsistence strategies. Chipped stone tools, such as projectile points, generally decrease in size but increase in number. Abundant bone and shell remains have been recovered from sites dating to these time periods. In coastal areas, the introduction of the circular shell fishhook and the growing abundance of fish remains in sites over the course of the period suggest a substantial increase in fishing activity during the Intermediate Horizon. It is also during this time period that mortar and pestle use intensified dramatically. The mano and metate continued to be in use on a reduced scale, but the greatly intensified use of the mortar and pestle signaled a shift away from a subsistence strategy based on seed resources to that of the acorn. It is probably during this time period that the acorn became the food staple of the majority of the indigenous tribes in Southern California. This subsistence strategy continued until European contact. Material culture became more diverse and

¹ BCE is defined as "Before Common Era" and generally refers to that time period commonly referred to as "Before Christ" (B.C.).

² CE is defined as "Common Era" and generally refers to that time period commonly referred to as "annō Domini" (A.D.).

elaborate and included steatite containers, perforated stones, bone tools, ornamental items, and asphalt adhesive.

Horizon IV: Late Prehistoric Cultures (750 CE to 1769 CE). During the Late Prehistoric Period, exploitation of many food resources, particularly marine resources among coastal groups, continued to intensify. The material culture in the Late Prehistoric Horizon increased in complexity in terms of the abundance and diversity of artifacts being produced. The recovery and identification of a number of small projectile points during this period likely suggests a greater utilization of the bow and arrow, which was likely introduced near the end of the Intermediate Period. Shell beads, ornaments, and other elements of material culture continue to be ornate, varied, and widely distributed; the latter evidence suggests elaborate trade networks. Warren's scheme divides the late prehistoric period into several regional traditions. Western Riverside County, Orange County, and the Los Angeles Basin area are considered part of the "Shoshonean" tradition, which may be related to a possible incursion of Takic speakers into these areas during this period. The Late Prehistoric Period includes the first few centuries of early European contact (1542–1769 CE); it is also known as the Protohistoric Period, as there was a low level of interaction between native Californians and Europeans prior to Portolá's overland expedition in 1769.

In the few centuries prior to European contact, the archaeological record reveals substantial increases in the indigenous population (Wallace 1955). Some village sites may have contained as many as 1,500 individuals. Apparently, many of these village sites were occupied throughout the year rather than seasonally. This shift in settlement strategy was likely influenced by improved food procurement and storage technology, which enabled population growth and may have helped stimulate changes in sociopolitical organization.

Evidence is growing that prehistoric cultural change has been much more variable through time and across culture areas than previously thought. Cultural traits (e.g., maritime economies, seafaring, complex trade networks, and year-round occupation of villages) appear to have developed much earlier than previously thought. Culture change during the Late Prehistoric Period, in particular, may have been driven more by environmental and resource pressures than optimal adaptation to the environment (Byrd and Raab 2007).

Ethnographic Background

The western Mohave Desert and Antelope Valley were occupied by at least four groups of Native Americans: the Vanyume/Serrano, the Kawaiisu, the Tataviam, and the Kitanemuk (AVIM 2010). A fifth group, the Haminot, that lived in the Lancaster and Palmdale area (Lloyd 2007) likely was a name given to the Kitanemuk by their Native American neighbors (Blackburn and Bean 1978). The languages of the Vanyume, Tataviam, and Kitanemuk appear to have been dialects of Serrano or Serran (Bean and Smith 1978).

Little is known about this period in the Antelope Valley region. Local groups continued to live in large, semi-permanent villages during the winter and, during the spring, summer, and fall, would separate into smaller groups to hunt and gather the locally available resources including, among others, piñon nuts, mesquite, and yucca. Most of the ethnographic groups of the area shared similar cultural traits and practices and, for the most part, maintained friendly relations with each other (Applied Earthworks 2007).

Historic Background

In 1772, Lieutenant Pedro Fages, leading a small force of Spanish soldiers, became the first European to enter the Antelope Valley. Other explorers passed through the valley over the next

century, but little change to the lifestyles of the local populations of the valley was evident until 1876, when the Southern Pacific Railroad completed its line between the Los Angeles Basin and the San Joaquin Valley (Norwood 1995; Tang et al. 2004).

Local History. The history of the City of Lancaster began when Moses Landley Wicks, a real estate developer, bought 640 acres of land from the railroad and laid out the town of Lancaster in 1884. The new town boomed during the 1880s and early 1890s; however, several years of drought beginning in 1895 forced most residents to leave the area (Tang et al. 2004). The City began to recover after the turn of the century, the turning point being the completion of the Los Angeles Aqueduct through the region in 1914, which permitted agricultural expansion (Norwood 1995). After World War II, the aerospace and defense industry became the largest business sector in the area with the construction of several aeronautical plants and the associated influx of workers to staff them (Tang et al. 2004). The City of Lancaster was incorporated in 1977 and has grown steadily since that time.

War Eagle Field. In 1941, War Eagle Field was opened by two businessmen as the Polaris Flight Academy on a large parcel that included at least a portion of the Project site. As the United States had not yet entered the war, the Academy trained British and Canadian cadets. In 1942, following the United States' entry into the war, the Academy also began training U.S. Army Air Corps cadets, and became one of the only civilian schools to conduct basic training for military cadets (Freeman 2015). The base soon doubled in size; then was renamed Mira Loma Flight Academy in June 1944 when it was consolidated with a training operation in Oxnard (Greenwood 2001).

Because of new federal regulations, before the end of the war, the Academy and War Eagle Field were sold to the Defense Plant Corporation, making it a government property, although it was still staffed by civilians (Greenwood 2001). The flight academy closed in 1945 at the end of the war, but the airfield remained open a few more years.

Mira Loma Detention Center. Between 1945 and 1946, the State Department of Corrections used the former flight academy and War Eagle Field facilities as a California Youth Authority facility. The California Youth Authority ran a vocational school there, focusing on job training for juvenile offenders. In 1947, the site was acquired by Los Angeles County "for possible use as a tuberculosis treatment center"; however, the State continued to use the facility as a vocational training center until 1953–1954 when it became known as the State Juvenile Jail at Mira Loma.

In 1954, Los Angeles County transferred approximately 400 medium-security inmates to the property, relocating the State's juvenile prisoners to a site in Tracy, east of the San Francisco Bay area. In 1957, the jail facilities on the County property were expanded in the southeastern half of the property, where the runways once were located. Two new jail barrack buildings, now known as Buildings E and F, were constructed to modernize the facilities at Mira Loma.

The County constructed new buildings at the Mira Loma Detention Center (MLDC) in the 1960s, including the steam plant and kitchen and dining building (within the Project site). The facility ceased operations for the first time in 1979. It reopened in 1983 and was expanded in 1986. The majority of the buildings in the southeastern half of the property (within the Project site) were developed in 1986 and later, as part of the expansion. The facility became a female jail and was known as the Mira Loma Female Honor Ranch. It closed again in 1993, and was reopened for use by the federal government as an Immigration and Naturalization Services (now Immigration and Customs Enforcement [ICE]) detention facility in 1997. The ICE facility closed in 2012.

Cultural Resources Record Search

A cultural resources records search was previously conducted by Patrick O. Maxon, RPA, of BonTerra Psomas for the Lancaster Solar Farm Project (located immediately east of the Project site) at the South Central Coastal Information Center (SCCIC) at California State University, Fullerton on May 3, 2010 (Appendix C-2). The records search included the Project site and is discussed below. The review consisted of an examination of the U.S. Geological Survey's (USGS') Lancaster West 7.5-minute quadrangle to identify any sites recorded or cultural resources studies conducted on the County parcel and within the vicinity of the site. The SCCIC is the designated branch of the California Historical Resources Information System (CHRIS) for the Project area and houses records concerning archaeological and historic resources in Los Angeles, Ventura, and Orange Counties. The records search provided data on known archaeological and built-environment resources, as well as previous studies within the project vicinity of the Project site. Data sources consulted at the SCCIC included archaeological records, Archaeological Determinations of Eligibility (DOE), historic maps, and the Historic Property Data File (HPDF) maintained by the OHP. The HPDF contains listings for the CRHR and/or NRHP, California Historical Landmarks (CHL), and California Points of Historical Interest (CPHI).

The literature review also identified 12 cultural resources studies undertaken within the vicinity of the Project site. One of these (LA-00131) included the southern ²/₃ of the Project site. The other 11 studies did not include the Project site. Peak and Associates (1988) conducted a survey of (1) all of USGS Section 13 to the east of the Project site; (2) much of USGS Section 14 that includes the Project site; and (3) approximately ¹/₅ of USGS Section 23 to the south. This survey resulted in the discovery and recordation of one site, CA-LAN-1412, located within Section 14, approximately 1,700 feet south of the Project site. Table 4.4-1 lists these studies.

**TABLE 4.4-1
CULTURAL RESOURCES STUDIES COMPLETED
IN THE PROJECT VICINITY**

Report Number	Recorder(s) (Year)	Type of Study
LA-00131	Gerry (1988)	Cultural Resource Assessment of the Proposed California State Prison, Lancaster, Los Angeles County, California
LA-01917	Singer and Atwood (1989)	Cultural resources survey and impact assessment for six properties near Lancaster (GPA Group), Los Angeles County, California
LA-07966	Hudlow (2006)	A Phase I Cultural Resource Survey APNs 3156-001-021, -022, -023, -024, and -025 and 3153-002-001, -019m, -020, -021, and -022, Property at 50 th Street West and Jackman Street, City of Lancaster, California
LA-07991	Tang, Hogan, and Smallwood (2006)	Cultural Resources Technical Report City of Lancaster General Plan Update
LA-08142	Underbrink and Ross-Hauer (2007)	Report of a Phase I Cultural Resources Inventory for a Proposed Storm Drain in the City of Lancaster, Los Angeles County, California
LA-08342	McKenna (2005)	A Phase I Cultural Resources Investigation for the Taft Corporation Property, APNs 3203-015-077 (5 Acres) in the City of Lancaster, Los Angeles County, California
LA-08350	Slawson (2001)	Historical Resources Assessment, Mira Loma Detention Center-Hangers No. 1 and 2, Lancaster, California

**TABLE 4.4-1
CULTURAL RESOURCES STUDIES COMPLETED
IN THE PROJECT VICINITY**

Report Number	Recorder(s) (Year)	Type of Study
LA-08438	McKenna (2004)	A Phase I Cultural Resources Investigation for the Taft Corporation Property, APNs 3203-015-059, -060, -069, and -143, in the City of Lancaster, Los Angeles County, California
LA-08456	Hudlow (2004)	A Phase I Cultural Resources Survey for Property at 45 th Street West and Avenue J-8, City of Lancaster, California
LA-08940	Sanka (2006)	Phase I Cultural Resource Assessment and Paleontological Records review – TTM 062758 and 062759, Lancaster, Los Angeles County, California
LA-10144	DeGiovine and Wilson (2008)	Second Addendum: Archaeological Survey Report for Southern California Edison Company the 66 kV Antelope Bus Split Project, Los Angeles County, CA
LA-10372	Wlodarski (2009)	A Phase I Archaeological Study for Tentative Tract 70761 Local East of 60 th Street West and South of Jamaica Lane, City of Lancaster, Los Angeles County, California

Although ten cultural resources sites have been recorded within the vicinity of the Project site, none of these sites have been recorded on the Project site itself. Five of the sites are historic refuse deposits consisting of tin cans, bottles, glass and metal fragments, ceramics, lumber, and animal bone ranging in age from the 1890s to the 1950s. Two building foundations, one occupation site, and the hangars at the MLDC are recorded near the Project site. One prehistoric site was also recorded. The exact locations of these sites are undisclosed in order to minimize opportunities for vandalism or the alteration of existing recorded resources. Table 4.4-2 lists these cultural resources sites.

**TABLE 4.4-2
CULTURAL RESOURCES SITES NEAR THE PROJECT SITE**

Site Number	Recorder(s) (Year)	Description
CA-LAN-1412	Gerry and Neuenschwander (1988)	Prehistoric lithic scatter; shell bead
19-002886	Norwood (2001)	Historic refuse deposit
19-002887	Norwood (2001)	Historic occupation and agricultural site
19-002888	Norwood (2001)	Historic refuse deposit
19-003658	Sanka (2006)	Historic dump with 5 loci
19-120068	Norwood (2001)	Historic refuse deposit
19-120070	Norwood (2001)	Historic refuse deposit with 4 loci
19-187634	Slawson (2000)	Mira Loma (War Eagle Field) hangars
19-187946	Hudlow (2006)	Building foundation
19-187947	Hudlow (2006)	Building foundation

Paleontological Resources Record Search

The Natural History Museum of Los Angeles County (NHMLAC) performed a paleontological resources records search for the Project area (in June 2010) and for the City of Lancaster 2030

General Plan update (in 2008). In both instances, the NHMLAC indicated that no known fossil localities have been previously recorded within the Project site, but fossil localities have been found nearby from sedimentary deposits that are similar to those that occur in the Project area. The surface deposits in the Project area are comprised exclusively of younger Quaternary alluvium. The NHMLAC reports that these types of sedimentary deposits usually do not contain significant vertebrate fossils, particularly in the uppermost layers.

Dr. Samuel A. McLeod at the NHMLAC identified known fossil localities (NHMLAC 5942 through 5953 related to pipeline excavations) in Quaternary alluvium and older Quaternary sediments several miles to the east-southeast of the Project area along Avenue S from Little Rock, extending east almost to the San Bernardino County Line. These sediments produced a fauna of small vertebrates including gopher snake, king snake, leopard lizard, cottontail rabbit, pocket mouse, kangaroo rat, and pocket gopher (see Appendix C-2 of this EIR).

Native American Scoping

An inquiry was made on January 30, 2014, of the Native American Heritage Commission (NAHC) to request a review of the Sacred Lands File database regarding the possibility of Native American cultural resources and/or sacred places in the Project vicinity that are not documented in other databases. The NAHC responded on January 31, 2014, and provided a list of Native American groups and individuals who may have knowledge regarding Native American cultural resources not formally listed on any database. The following Native American tribes and individuals were mailed an informational letter on February 3, 2014, requesting any information they might have regarding cultural resources in the area:

- Beverly Salazar Folkes, Chumash, Tataviam, and Fernandefio Tribal Member
- Larry Ortega, Chairperson, Fernandefio Tataviam Band of Mission Indians
- Ron Andrade, Director, LA City/County Native American Indian Commission
- Delia Dominguez, Chairperson, Kitanemuk and Yowlumne Tejon Indians
- John Valenzuela, Chairperson, San Fernando Band of Mission Indians
- Randy Guzman-Folkes, Chumash, Fernandefio, Tataviam, Shoshone Paiute, and Yaqui Tribal Member
- Daniel McCarthy, M.S., Director-CRM Department, San Manuel Band of Mission Indians

Daniel McCarthy of San Manuel Band of Mission Indians responded via email on February 6, 2014, and stated that, given the nature and location of the Project, the San Manuel Band has no concerns. No additional responses have been received to date. Appendix C-3 contains the Native American correspondence.

4.4.3 THRESHOLDS OF SIGNIFICANCE

The following thresholds of significance are derived from the Environmental Checklist in Appendix G of the State CEQA Guidelines. A project would result in a significant adverse impact related to Cultural Resources if it would:

- Threshold 4.4a:** Cause a substantial adverse change to the significance of a historical resource as defined in CEQA Guidelines Section 15064.5.
- Threshold 4.4b:** Cause a substantial adverse change to the significance of an archaeological resource as defined in CEQA Guidelines Section 15064.5.
- Threshold 4.4c:** Directly or indirectly destroy a unique paleontological resource or site or unique geological feature.
- Threshold 4.4d:** Disturb any human remains, including those interred outside formal cemeteries.

Section 15064.5 of the State CEQA Guidelines provides significance criteria for historical and unique archaeological resources. Historical resources are defined as:

- (1) A resource listed in, or determined to be eligible by the State Historical Resources Commission for listing in, the California Register of Historical Resources (PRC 5024.1; 14 CCR 4850 et seq.).
- (2) A resource included in a local register of historical resources, as defined in Section 5020.1(k) of the Public Resources Code or identified as significant in a historical resource survey meeting the requirements of Section 5024.1(g) of the Public Resources Code, shall be presumed to be historically or culturally significant. Public agencies must treat any such resource as significant unless the preponderance of evidence demonstrates that it is not historically or culturally significant.
- (3) Any object, building, structure, site, area, place, record, or manuscript that a Lead Agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California may be considered to be a historical resource, provided the Lead Agency's determination is supported by substantial evidence in light of the whole record. Generally, a resource shall be considered by the Lead Agency to be "historically significant" if the resource meets the criteria for listing on the California Register of Historical Resources (PRC 5024.1; 14 CCR 4852), including if the project:
 - (a) Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage;
 - (b) Is associated with the lives of persons important in our past;
 - (c) Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or
 - (d) Has yielded, or may be likely to yield, information important in prehistory or history.
- (4) The fact that a resource is not listed in, or determined to be eligible for listing in the CRHR, not included in a local register of historical resources, or identified

in an historical resources survey does not preclude a Lead Agency from determining that the resource may be a historical resource as defined in PRC Sections 5020.1(j) or 5024.1.

Impacts to cultural resources are considered significant if the project would (1) physically destroy or damage all or part of a resource; (2) change the character of the use of the resource or physical feature within the setting of the resource which contributes to its significance; or (3) introduce visual, atmospheric, or audible elements that diminish the integrity of significant features of the resource.

4.4.4 PROJECT DESIGN FEATURE

PDF CUL-1 The Project site boundaries, as defined, exclude the two hangars, which have been previously evaluated and appear eligible for listing in the National Register of Historic Places (NRHP). The Contractor's Specifications will require that none of the Polaris Flight Academy Historic District's contributing buildings or structures would be impacted by the Project.

4.4.5 REGULATORY REQUIREMENT

RR CUL-1 All construction activities will be conducted in accordance with Section 7050.5 of the California Health and Safety Code regarding the potential discovery of human remains. If applicable, the Native American Heritage Commission (NAHC) will be responsible for designating the most likely descendant (MLD), as required by Section 5097.98 of the California Public Resources Code. If the landowner rejects the recommendations of the MLD, the burial location would be determined in compliance with California Public Resources Code, Section 5097.98.

4.4.6 ENVIRONMENTAL IMPACT ANALYSIS

Threshold 4.4a: **Would the project cause a substantial adverse change to the significance of a historical resource as defined in CEQA Guidelines Section 15064.5?**

Short-Term Construction Impacts

Exhibit 4.4-1, Historic Evaluation Study Area, depicts the area evaluated for historic resources, which includes both on-site and off-site areas. Table 4.4-3 provides a summary of the results of the historic evaluation. Detailed discussion and completed California Department of Parks and Recreation (DPR) Forms are provided in the Historical Resource Report in Appendix C-1 of this EIR. Exhibit 4.4-2 shows the location of each building that was evaluated, including the locations and Map Reference Number for the structures listed below in Table 4.4-3.



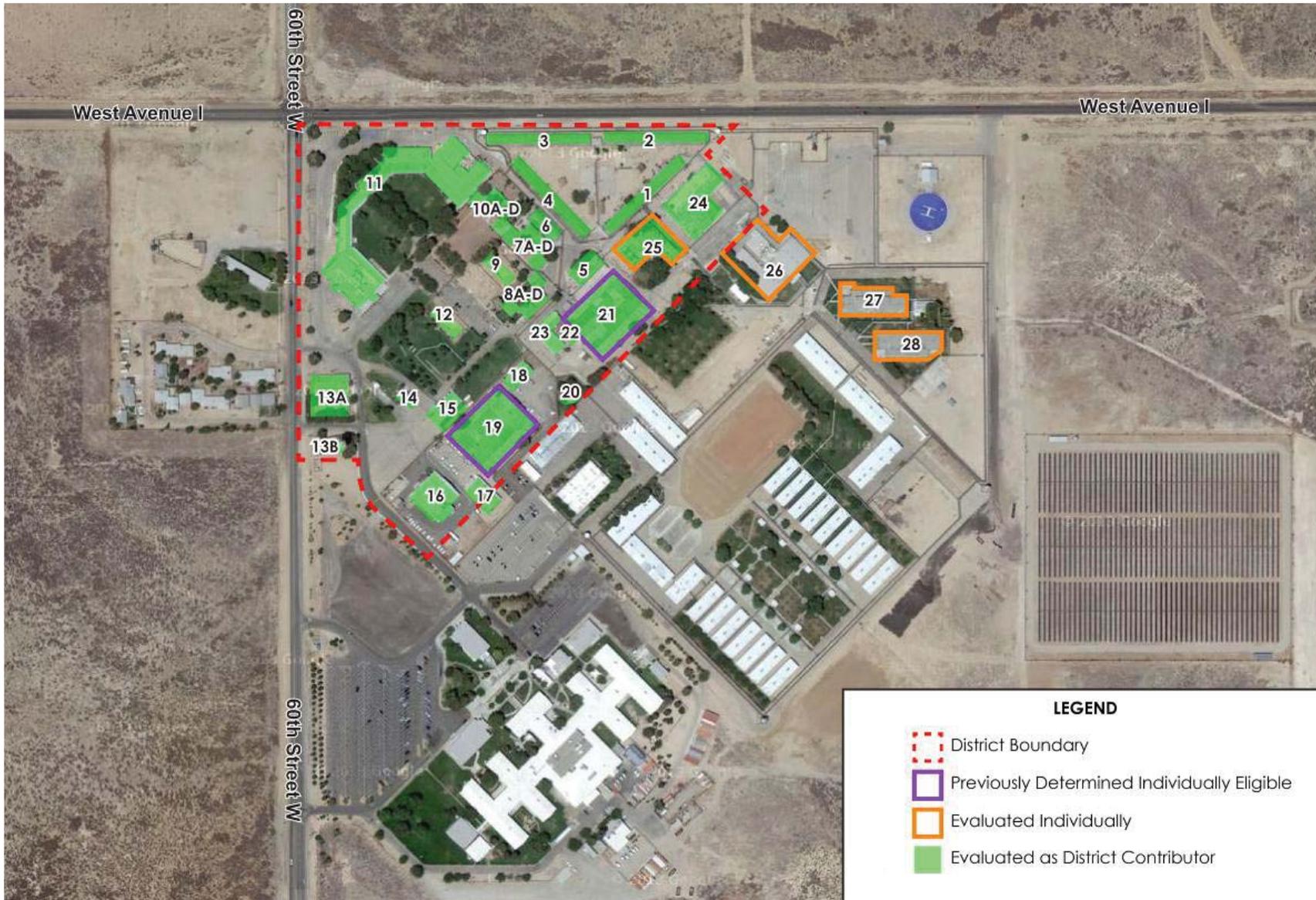
Source: GPA 2015

Historic Evaluation Study Area

Exhibit 4.4-1

Mira Loma Women's Detention Center





LEGEND

-  District Boundary
-  Previously Determined Individually Eligible
-  Evaluated Individually
-  Evaluated as District Contributor

Source: GPA 2015

Evaluated Resources

Mira Loma Women's Detention Center

Exhibit 4.4-2



D:\Projects\COLACEO\J001\Graphics\EIR\Ex_ EvaluatedResources_20151023.ai

**TABLE 4.4-3
SUMMARY OF HISTORICAL RESOURCE EVALUATION**

Map Reference Number	Resource Name	Year Built	Status Code*
N/A	Polaris Flight Academy Historic District	c. 1941–c. 1945	3S
1	D Barracks	c. 1942	3D
2	C Barracks	c. 1942	3D
3	B Barracks	c. 1942	3D
4	A Barracks	c. 1942	3D
5	Sergeants' Office	c. 1942	3D
6	Silver Bullet Theater	c. 1942	3D
7A	Officers' Quarters	c. 1941	3D
7B	Officers' Quarters	c. 1941	3D
7C	Officers' Quarters	c. 1941	3D
7D	Officers' Quarters	c. 1941	3D
8A	Officers' Quarters	c. 1941	3D
8B	Officers' Quarters	c. 1941	3D
8C	Officers' Quarters	c. 1941	3D
8D	Officers' Quarters	c. 1941	3D
9	East Pool	c. 1942	3D
10A	Officers' Quarters	c. 1941	3D
10B	Officers' Quarters	c. 1941	3D
10C	Officers' Quarters	c. 1941	3D
10D	Officers' Quarters	c. 1941	3D
11	Administration Building	c. 1941	3D
12	West Pool	c. 1942	3D
13A	Reservoir	c. 1942	6Z
13B	Water Tower	c. 1959	6Z
14	Office Building	c. 1942	3D
15	Training Building	c. 1942	3D
16	Small Hangar	c. 1942	3D
17	Internal Services Department	c. 1974	6Z
18	Wooden Shed	c. 1959	6Z
19	Hangar 1	c. 1941	3B
20	Flight Tower	Pre-1942	3D
21	Hangar 2	c. 1941	3B
22	Quonset Hut	c. 1971	6Z
23	Old Lock Building	c. 1946	6Z
24	ESB Building	c. 1942	6Z
25	Central Boiler Plant	c. 1961	6Z
26	Kitchen and Dining Hall	c. 1962	6Z
27	Building E	c. 1957	6Z
28	Building F	c. 1957	6Z

N/A: not applicable; c.: circa
* Status Codes:
3B – appears eligible for the NRHP both individually and as a contributor to an eligible district.
3D – appears eligible for the NRHP as a contributor to an eligible district.
3S – appears eligible for the NRHP as an individual property.
6Z – ineligible for national, State, or local designation.
Source: GPA Consulting 2015.

The cultural resources records search revealed the existence of two World War II-era airplane hangars (P-19-187634), previously evaluated as appearing eligible for listing on the NRHP (but not formally listed) and located in the MLDC. As a result, they should be considered historical resources as defined by CEQA. There is a formal process for listing properties in both the National and California Registers. Formal designation of the hangars would have to occur through nomination and approval by the State Historical Resources Commission (both California and National Registers) and the Keeper of the National Register at the National Park Service (National Register only).

The locations of these two hangars are shown on Exhibit 4.4-2; are outlined in purple; and have the Map Reference Numbers of 19 and 20. The Project site, as defined, does not include the hangars (PDF CUL-1), and the Project does not propose any modifications or alterations to the hangars. The hangars would not be impacted by the Project.

As shown on Exhibit 4.4-2, the buildings within the red dashed line—which includes both on-site and off-site areas, including the Central Boiler Plant (orange outline Structure 25), the Kitchen and Dining Building (orange outline Structure 26), and Buildings E and F (orange outline Structures 27 and 28)—were all evaluated for listing in the NRHP and CRHR using the established criteria and aspects of integrity. Buildings 25 through 28 are on-site structures and were identified as requiring evaluation because they were over 45 years of age³ and had not been previously evaluated. One of the buildings within the district—the Central Boiler Plant (i.e., steam plant)—was evaluated both as a potential contributor to the district and as an individual resource. The three additional buildings are located in an area of the parcel that developed between the mid-1950s and 2000s. They do not have the potential to constitute or contribute to a historic district, so they were evaluated individually.

Exhibit 4.4-3, Historic District Contributors, shows the results of the historic evaluation, which indicates that the Central Boiler Plant (Structure 25), the Kitchen and Dining Building (Structure 26), and Buildings E and F (Structures 27 and 28) were all determined to be ineligible for listing under the NRHP and CRHP because none of these structures meet any of the criteria. Thus, demolition, renovation, or any other alterations to Buildings E and F, the Kitchen and Dining Building, and the Central Boiler Plant would not result in a significant impact to a historical resource and no mitigation would be required. Please see Appendix C-1 to this EIR for full evaluations on the appropriate DPR 523 forms.

Polaris Flight Academy Historic District

The northwest corner of the MLDC consists of a cohesive grouping of resources constructed within the same time period and for the same purpose. As a result, the northwest corner was evaluated as a potential historic district. The buildings in the southeast portion, on the other hand, were constructed during a variety of different time periods by different entities and were, for the most part, not part of a distinct building program. They do not constitute a cohesive collection of resources developed at the same time or for the same purpose. Additionally, most of them are not yet 45 years old. As a result, the southeast half of the Project site does not constitute a potential historic district.

The Polaris Flight Academy Historic District (Historic District) played an important and unique role in military aviation during World War II. It produced an estimated 7,000 Army Air Force pilots during the war years, and was one of a small number of civilian schools in the U.S. to train British

³ In standard historic preservation practice, buildings over 45 years of age are evaluated as potential historical resources, even though the general benchmarks established for historical resources is 50 years of age, for the following reason: Large projects take several years to complete. Using 45 years instead of 50 creates a five-year cushion within which a project may be approved before the historic studies run the risk of becoming outdated.



Source: GPA 2015

Historic District Contributors

Exhibit 4.4-3

Mira Loma Women's Detention Center



pilots in the early years of the war under the Lend-Lease Act. As a result, the district appears to be significant under NRHP Criterion A for a direct association with events that have made a significant contribution to the broad patterns of our history.

The Historic District also appears to be significant under Criterion B at a statewide level for its direct association with Major Corliss C. Moseley, a significant figure in the fields of military and civilian aviation. The district represents Moseley's contributions to military aviation as a civilian contractor during World War II from 1941, the year the school opened, to 1945, the year it closed. It appears to be equal in importance and strength of association to the other two flight schools from the same period, and it also appears to be the most intact.

The Historic District meets the criteria for listing in the NRHP at a statewide level of significance under Criteria A and B and for listing in the CRHR under Criteria 1 and 2 for direct associations with military aviation during World War II and with the work of Major Corliss C. Moseley, respectively. It should, therefore, be considered a historical resource, subject to the requirements of CEQA. The period of significance under both criteria is 1941 to 1945. The historic district retains five of the seven aspects of integrity: location, materials, workmanship, feeling, and association. Its setting and design have been altered, but these alterations have not diminished its ability to convey its significance under Criteria A and B.

In its current form, the Historic District does not embody the distinctive characteristics of a type, period, or method of construction; it does not represent the work of a master, nor does it possess high artistic values. Additionally, it does not represent a significant and distinguishable entity whose components lack individual distinction. The Historic District was determined not to be eligible under Criterion C. As discussed under Threshold 4.4b below, there are no archaeological issues of concern related to the Project site, and mitigation measure (MM) CUL-1 would address the potential for impacting any unknown subterranean archaeological resources. Therefore, the Historic District was determined not to be eligible under Criterion D.

As shown, 27 buildings are considered contributors to the Polaris Flight Academy Historic District and 8 buildings are considered non-contributors. The majority of the proposed renovation and new construction would occur outside the Historic District. Changes within the Historic District would be limited to (1) demolition of non-contributing buildings (i.e., Wooden Shed, Quonset Hut, and Old Lock Building) for the creation of a parking lot and other minor utility trenching in paved areas within the District boundaries; and (2) decommissioning of the register-ineligible Central Boiler Plant (i.e., steam plant) and demolition of the ESB Building for construction of the new food warehouse and laundry. None of the District's contributing buildings or structures would be impacted by the Project. Changes in the vicinity of Hangars 1 and 2 would also be visual in nature and only minimally alter their immediate setting.

The construction of one new building within the boundaries of the Polaris Flight Academy Historic District as part of the Project would only affect non-contributing features of the Historic District. Minor changes, the conversion of vacant land to surface parking, would constitute a minimal visual change. New utility lines and utility line extensions within the boundaries of the Polaris Flight Academy Historic District would be entirely underground and would have no visual impact on the Historic District. The construction required to complete these infrastructure improvements would be generally limited to trenching, which would not pose a threat to the Historic District or its contributors in the form of excessive vibrations. Trenches would be routed around building contributors and would be subsequently filled in, so they would have no permanent visual impact on the Historic District and the hangars. The proposed communications tower would be located outside of the Historic District. Thus, the Project would not materially alter the physical characteristics that convey the significance of the historical resources. Because there would be no impacts to any contributing buildings in the Historic District (see PDF CUL-1) and because the

proposed redevelopment activities within the Historic District would have a less than significant indirect impact on the physical characteristics that convey the significance of the Historic District, impacts would be less than significant and no mitigation is required.

Long-Term Operational Impacts

After Project construction, all historical resources within the Historic District would remain eligible for listing in both the NRHP and CRHR. The operation of the MLWDC would not involve changes to the hangars or structures within the Polaris Flight Academy Historic District. No impact to nearby historical resources would occur, and no mitigation is required.

Threshold 4.4b: Would the project cause a substantial adverse change to the significance of an archaeological resource as defined in CEQA Guidelines Section 15064.5?

Short-Term Construction Impacts

No archaeological resources were discovered on site as a result of the pedestrian survey by Patrick O. Maxon, RPA, of BonTerra Psomas. Also, the site is largely paved and built over and past ground disturbance associated with the existing on-site improvements would have likely moved, disturbed, destroyed, or altered in-situ archaeological resources. However, it cannot be entirely discounted that archaeological resources may be present beneath the pavement, buildings, or ground surfaces. Grading and excavation associated with construction of the Project and subterranean utilities would have the potential to disturb any underlying archaeological resources. Impacts to archaeological resources would be a significant impact prior to mitigation.

MM CUL-1 calls for a qualified Archaeologist to be retained by the County to attend the pre-grading meeting with the Construction Contractor to establish, based on the site plans, appropriate procedures for monitoring earth-moving activities during construction. The Archaeologist would determine, based on consultation with the County, when monitoring of grading activities is needed. Monitoring should observe disturbance of the uppermost layers of sediment (soils and younger Quaternary alluvium) and any archaeological resources discovered shall be salvaged and catalogued, as necessary. Implementation of MM CUL-1 would reduce the potential for the destruction of any significant archaeological resources beneath the site. Impacts would be less than significant after mitigation.

Long-Term Operational Impacts

Operation of the MLWDC would not involve grading and excavation that may lead to the discovery of archaeological resources. No impact would occur.

Threshold 4.4c: Would the project directly or indirectly destroy a unique paleontological resource or site or unique geological feature?

Short-Term Construction Impacts

No paleontological resources were discovered on site as a result of the pedestrian survey by Patrick O. Maxon, RPA, of BonTerra Psomas. A paleontological resources records search and literature review was conducted by Dr. Samuel A. McLeod at the NHMLAC. According to the records search, no known fossil localities have been previously recorded within the Project site. The surface deposits in the Project area are comprised exclusively of younger Quaternary alluvium that usually do not contain significant vertebrate fossils, particularly in the uppermost

layers. However, Quaternary alluvium and older Quaternary sediments that are present in the Project area have yielded fossils.

Thus, excavation activities on and off the site that would extend into older Quaternary sediments underlying the surface soils, could disturb or destroy paleontological resources beneath the site. Impacts to paleontological resources would be a significant impact prior to mitigation.

MM CUL-2 calls for a qualified Paleontologist to be retained by the County to monitor excavations into undisturbed deposits in the older Quaternary alluvium, which lies at an unknown depth below the younger Quaternary alluvium. The Paleontologist would evaluate any fossil resources found during excavation activities. If a fossil resource is determined to be significant, the Paleontologist would formulate and implement a plan to recover and/or salvage the resource. Compliance with MM CUL-2 would reduce impacts to less than significant levels after mitigation.

Long-Term Operational Impacts

Operation of the MLWDC would not involve grading and excavation that may lead to the discovery of paleontological resources. No impact would occur.

Threshold 4.4d: Would the project disturb any human remains, including those interred outside formal cemeteries?

Short-Term Construction Impacts

There is no indication that human remains are present within the Project site. Past land uses on the site include a flight academy and a detention center. The literature review and records searches do not indicate the use of the site for religious or sacred purposes or as a burial area. Also, neither the NAHC nor the local Native American tribes have indicated that there are sacred places on or near the site. Ground disturbance associated with the Project and proposed infrastructure improvements, however, may unearth previously undiscovered human remains.

In compliance with Section 7050.5 of the *California Health and Safety Code*, if human remains are encountered during excavation activities, all work shall halt at the site and or any nearby areas reasonably suspected to overlie adjacent remains, and the County Coroner shall be notified (RR CUL-1). The Coroner will determine whether the remains are of forensic interest within two working days of receiving notification. If the Coroner, with the aid of the qualified Archaeologist, determines that the remains are prehistoric, the Coroner will contact the NAHC within 24 hours of the determination. The NAHC shall be responsible for designating the most likely descendant (MLD), who will be responsible for the ultimate disposition of the remains, as required by Section 5097.98 of the *California Public Resources Code*. Compliance with RR CUL-1 would ensure that impacts on human remains would be less than significant. No mitigation is required.

Long-Term Operational Impacts

Operation of the MLWDC would not involve grading or excavation that may lead to the discovery of buried human remains. No impact would occur.

4.4.7 CUMULATIVE IMPACTS

Future growth and development in Lancaster and the greater Antelope Valley, including construction of the Project and the cumulative projects, would lead to ground disturbance, which may affect in situ cultural resources in the Project area. Due to the site-specific nature of cultural resources, it is difficult to determine if significant cumulative impacts to cultural resources would

occur on individual development sites. Development on sites with native soils and where no previous developments have occurred has the potential to yield archaeological resources, and excavation into older alluvium may uncover paleontological resources. The extent or significance of these resources cannot be determined until they are discovered during surveys and subsequently evaluated upon excavation of native soils.

Cultural resources site surveys that are conducted prior to development would allow the early identification of on-site cultural resources and the preservation of significant resources. Compliance with Section 15064.5 of the State CEQA Guidelines to determine if there are important cultural resources on individual development sites would prevent cumulative impacts on cultural resources. Also, implementation of project-specific mitigation as part of individual projects and cultural resource studies would avoid significant cumulative impacts.

Implementation of MM CUL-1 and MM CUL-2 would reduce potential direct impacts to archaeological and paleontological resources to less than significant levels and would reduce the Project's contribution to significant cumulative adverse impacts to less than significant levels. Compliance with RR CUL-1 by the Project and other proposed/planned developments, as it pertains to the disposition of human remains that are discovered during excavation or grading, would prevent significant impacts, and potential impacts on human remains would not be cumulatively considerable.

The Project has been specifically defined, as set forth in PDF CUL-1, to avoid direct impacts to any historic resources. Construction activities in the Historic District to construct utilities and parking lots would not affect any "contributing structures" to the Historic District, and all direct and indirect impacts would be less than significant. All other cumulative development projects that have the potential to affect historic resources would also be subject to evaluation in compliance with applicable regulations, including Section 15064.5 of the State CEQA Guidelines; Section 106 of the NHPA (16 *United States Code* [USC] Section 470f); and the CRHR, which was established in 1992 through Sections 5020 et seq. of the *California Public Resources Code*. Because there are no Project-related significant impacts to historic resources that would require mitigation and because future cumulative projects would also need to consider and mitigate for any impacts to historic resources in compliance with applicable regulations, impacts would not be cumulatively considerable.

4.4.8 MITIGATION MEASURES

MM CUL-1 Prior to the start of construction activities, a qualified Archaeologist shall be retained by the County to attend the pre-grading meeting with the construction contractor to establish, based on the site plans, appropriate procedures for monitoring earth-moving activities during construction. The Archaeologist shall determine, based on consultation with the County, when monitoring of grading activities is needed. Monitoring should observe disturbance in the uppermost layers of sediment including the younger Quaternary Alluvium (i.e. approximately 5 feet below ground surface or shallower) and if any archaeological resources are discovered, construction activities must cease within 50 feet of the discovery, as appropriate, and they shall be protected from further disturbance until the qualified Archaeologist evaluates them using standard archaeological protocols. The Archaeologist must first determine whether an archaeological resource uncovered during construction is a "Tribal Cultural Resources" pursuant to Section 21074 of the California Public Resources Code, or a "unique archaeological resource" pursuant to Section 21083.2(g) of the California Public Resources Code or a "historical resource" pursuant to Section 15064.5(a) of the State CEQA Guidelines. If the archaeological resource is determined to be a "Tribal Cultural Resource",

“unique archaeological resource” or a “historical resource”, the Archaeologist shall formulate a Mitigation Plan in consultation with the County of Los Angeles that satisfies the requirements of the above-listed Code Sections. Upon approval of the Mitigation Plan by the Los Angeles County Director of Public Works (DPW), the Project shall be implemented in compliance with the Plan.

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

MM CUL-2 Prior to the start of ground disturbing activities in native soils, a qualified Paleontologist shall be notified and retained when earth-moving activities are anticipated to impact undisturbed deposits in the older Quaternary alluvium on the Project site (i.e. approximately 5 feet below ground surface or deeper). The designated Paleontologist shall be present during the pre-grade meeting to discuss paleontological sensitivity and to assess whether scientifically important fossils have the potential to be encountered. The Paleontologist shall determine, based on consultation with the County, when monitoring of grading activities is needed based on the on-site soils and final grading plans.

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

4.4.9 LEVEL OF SIGNIFICANCE AFTER MITIGATION

With implementation of MM CUL-1 and MM CUL-2, impacts to archaeological and paleontological resulting from implementation of the Project would be reduced to a less than significant level. No significant unavoidable direct, indirect, or cumulative impacts to cultural resources would occur.

4.4.10 REFERENCES

Antelope Valley Indian Museum (AVIM). 2015 (April 29, access date). American Indian Peoples of the Antelope Valley. Lancaster, CA: AVIM. <http://www.avim.parks.ca.gov/people/>.

Applied Earthworks. 2007. *Cultural Resources Survey for the Lane Ranch Towne Center Project in Lancaster, Los Angeles County, California*. Fresno, CA: Applied Earthworks.

Bean, L.J. and C.R. Smith. 1978. Gabrielino (pp. 538–549). In *Handbook of North American Indians* (Vol. 8, California, R.F. Heizer, Ed). Washington, D.C: Smithsonian Institution.

- Blackburn, T. and L.J. Bean. 1978. Kitanemuk. *Handbook of North American Indians, California* (Volume 8, California, R.F. Heizer, Ed.). Washington, D.C.: Smithsonian Institution.
- Byrd, B. and M. Raab. 2007. Prehistory of the Southern Bight: Models for a New Millennium (pp. 215–227). In *California Prehistory: Colonization, Culture, and Complexity* (T. Jones and K. Klar, Eds). Lanham, MD: Altamira Press.
- California State Military Museum. 2009. Historic California Posts: War Eagle Field (Liberty Field). Sacramento, CA: California State Military Museum. <http://californiamilitaryhistory.org/WarEagleField.html>.
- Chartkoff, J.L. and K.K. Chartkoff. 1984. *The Archaeology of California*. Stanford, CA: Stanford University Press.
- Freeman, P. 2015 (April 29, last revised). Abandoned & Little-Known Airfields: California – Southern Palmdale Area. http://www.airfields-freeman.com/CA/Airfields_CA_PalmdaleS.htm.
- GPA Consulting (GPA). 2015 (April). Mira Loma Women's Detention Center Historical Resource Report. El Segundo, CA: GPA.
- Greenwood and Associates. 2001. *Historical Resources Assessment, Mira Loma Detention Center – Hangars No. 1 and 2, Lancaster, California*. Pacific Palisades, CA: Greenwood and Associates.
- Koerper, H.C. 1981. Prehistoric Subsistence and Settlement in the Newport Bay Area and Environs, Orange County, California (Ph.D. dissertation). University of California, Riverside.
- Koerper, H.C. and C. Drover. 1983. Chronology Building for Coastal Orange County, The Case from CA-ORA-119-A. *Pacific Coast Archaeological Society Quarterly* 19(2):1–34.
- Lloyd, J. 2007. *Cultural Resources Survey for the Lane Ranch Towne Center Project in Lancaster, Los Angeles County, California* (On file, City of Lancaster). Fresno, CA: Applied Earthworks.
- McLeod, S. 2010. Paleontological Resources for the proposed Lancaster Solar Farm Project, in the City of Lancaster, Los Angeles County, project area. Los Angeles, CA: Natural History Museum of Los Angeles County.
- Moratto, M.J. 1984. *California Archaeology*. San Diego, CA: Academic Press.
- Norwood, R. 1995. *Phase I Cultural Resource Investigation for Parcels APN 3176-5-902; 3176-9-17, 18, 19; 3176-10-24 Lancaster, Los Angeles County, California*. Fullerton, CA: South Central Coastal Information Center, California State University, Fullerton.
- Office of Historic Preservation. 1990. *Archaeological Resource Management Reports (ARMR): Recommended Contents and Format*. Sacramento, CA: Department of Parks and Recreation, Office of Historic Preservation.
- Tang, T., M. Hogan, and C. Tibbet (Tang et al.). 2004. *Historic-Period Building Survey, Northeast Gateway Corridors Plan EIR, City of Lancaster, Los Angeles County, California*. Fullerton, CA: South Central Coastal Information Center, California State University, Fullerton.

- Wallace, W. 1955. A Suggested Chronology for Southern California Coastal Archaeology. *Southwestern Journal of Anthropology* 11: 214–230.
- Warren, C.N. 1968. Cultural Traditions and Ecological Adaptation on the Southern California Coast. In *Archaic Prehistory in the Western United States. Eastern New Mexico Contributions in Anthropology* 1(3): 1–14.
- Weeks, K. and A. Grimmer. 1995. *The Secretary of The Interior's Standards for the Treatment of Historic Properties: With Guidelines for Preserving, Rehabilitating, Restoring & Reconstructing Historic Buildings*. Washington, D.C.: U.S. Department of the Interior, National Park Service, Cultural Resource Stewardship and Partnerships, Heritage Preservation Services.

4.5 GEOLOGY AND SOILS

This section analyzes the potential impacts of the Project, as it relates to geology, seismology and soils. Information on the geologic and seismic characteristics of the site and surrounding area is largely derived from the *Geohazard Study Report – Mira Loma Detention Center, 45100 North 60th Street West, Lancaster, California* prepared by Converse Consultants in June 2014, included as Appendix D of this EIR.

4.5.1 RELEVANT PROGRAMS AND REGULATIONS

State

Alquist-Priolo Earthquake Fault Zoning Act

In response to the 1971 San Fernando Earthquake in Southern California, the Alquist-Priolo Special Studies Zones Act of 1972 was enacted. The Act was renamed in 1994 to the Alquist-Priolo Earthquake Fault Zoning (APEFZ) Act. Under this Act, Earthquake Fault-Rupture Zones have been delineated along the traces of active faults to prevent the construction of structures for human occupancy across the trace of active faults. The boundary of the fault zone is approximately 500 feet from major active faults and 200 to 300 feet from well-defined minor faults. The State Geologist defines an active fault as a fault that has previous surface displacement within the Holocene period (i.e., within the last 11,000 years). A potentially active fault is defined as any fault that has surface displacement during Quaternary time (i.e., within the last 1,600,000 years), but not within the Holocene period. There is no designated Earthquake Fault Zone on or near the site. Exhibit 4.5-1 provides a Fault Map that depicts known faults near the Project site.

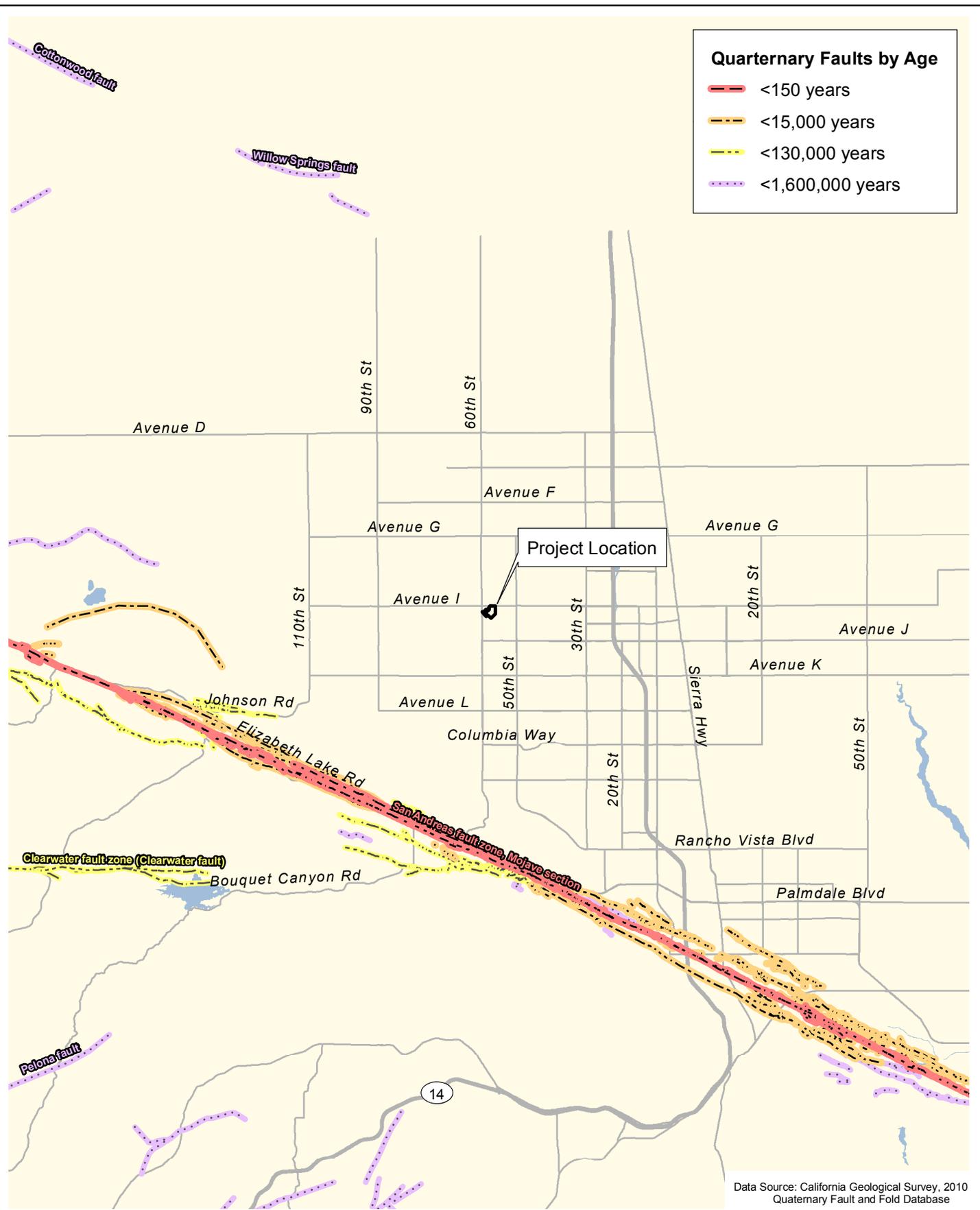
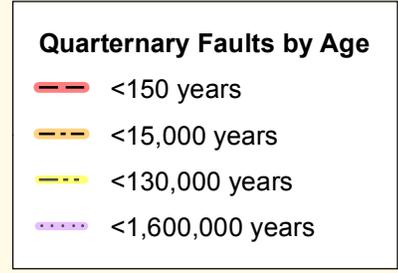
Seismic Hazards Mapping Act

The Seismic Hazards Mapping Act of 1990 (*California Public Resources Code*, Sections 2690–2699.6) directs the California Department of Conservation to identify and map areas subject to earthquake hazards, such as liquefaction, earthquake-induced landslides, and amplified ground shaking. Passed by the State legislature after the 1989 Loma Prieta Earthquake, the Seismic Hazards Mapping Act seeks to reduce the threat to public safety and to minimize potential loss of life and property in the event of a damaging earthquake event. Under the Seismic Hazards Mapping Program, Seismic Hazard Zone Maps have been prepared to identify areas with liquefaction and landslide hazards as Zones of Required Investigation. Most developments designed for human occupancy that are planned within these zones are required to conduct site-specific geotechnical investigations to identify seismic hazards and to develop appropriate mitigation measures prior to permitting by local jurisdictions.

The area immediately southeast of the site is identified in the State's Hazards Mapping Program as having liquefaction hazards. However, the site itself and its surrounding area are not located in an area with earthquake-induced landslide hazards. Exhibit 4.5-2 shows designated Seismic Hazard Zones near the site.

California Building Code

The California Building Code (CBC) is promulgated under the *California Code of Regulations* (CCR, Title 24, Parts 1 through 12), with the California Building Standards Commission (CBSC) responsible for administering CBC, including the adoption, approval, publishing, and implementation of the code. The national model code standards adopted into Title 24 apply to the



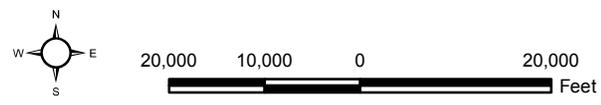
D:\Projects\COLACEO\001\MXD\EIREX_Faults_20151023.mxd

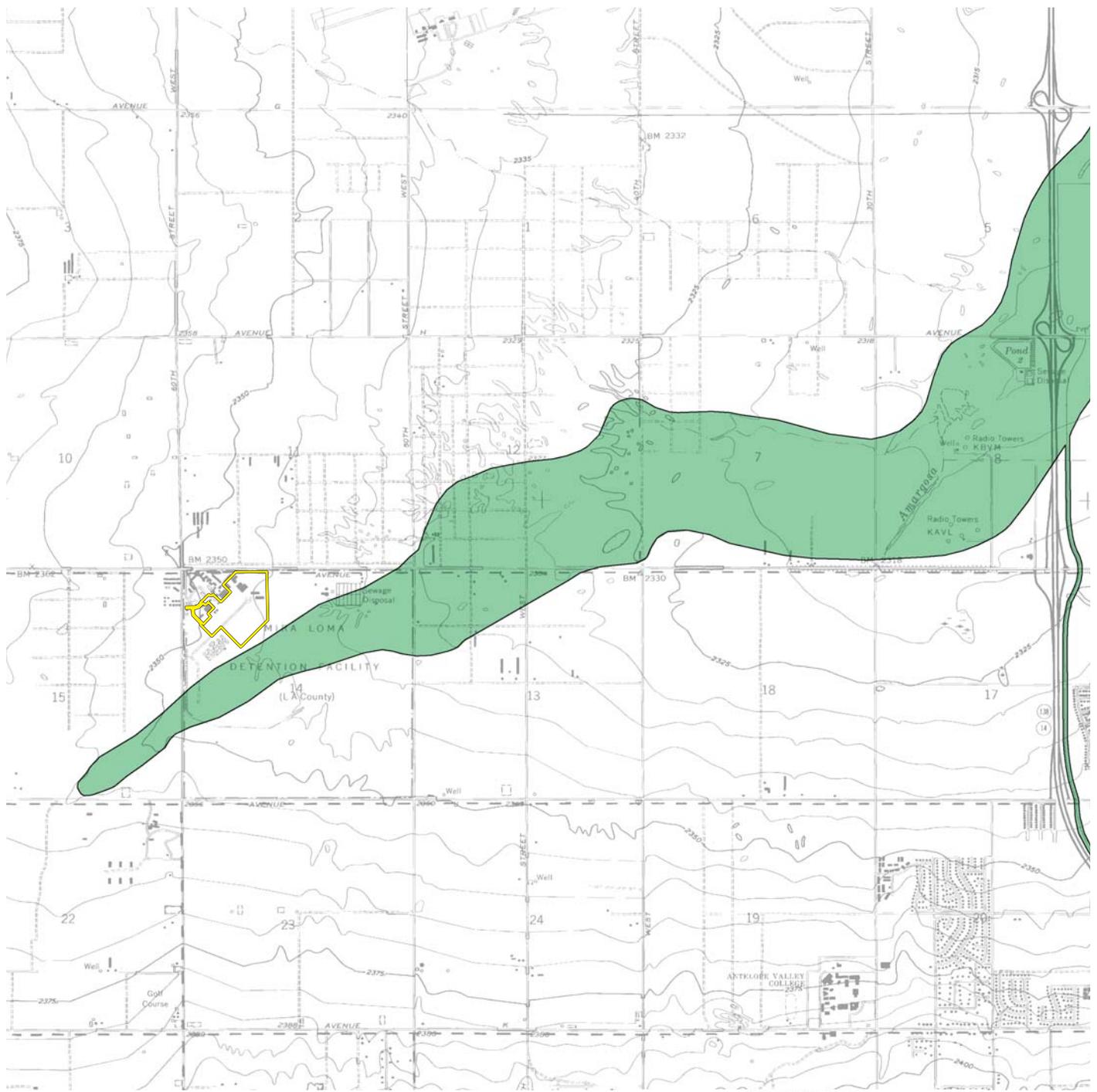
Data Source: California Geological Survey, 2010
Quaternary Fault and Fold Database

Regional Faults

Mira Loma Women's Detention Center

Exhibit 4.5-1





 Project Site



MAP EXPLANATION

Zones of Required Investigation:

Liquefaction
 Areas where historical occurrence of liquefaction, or local geological, geotechnical and ground-water conditions indicate a potential for permanent ground displacements such that mitigation as defined in Public Resources Code Section 2693(c) would be required.

Earthquake-Induced Landslides
 Areas where previous occurrence of landslide movement, or local topographic, geological, geotechnical and subsurface water conditions indicate a potential for permanent ground displacements such that mitigation as defined in Public Resources Code Section 2693(c) would be required.

NOTE: Seismic Hazard Zones identified on this map may include developed land where delineated hazards have already been mitigated to city or county standards. Check with your local building/planning department for information regarding the location of such mitigated areas.

Source: California Department of Conservation 2005

Seismic Hazard Zone

Mira Loma Women's Detention Center



Exhibit 4.5-2



design, construction, and maintenance of all buildings in California, except for modifications adopted by State agencies and local governing bodies.

The CBC requires the preparation of engineering geologic reports, supplemental ground-response reports, and/or geotechnical reports for all new construction; new structures on existing sites; and alterations to existing buildings. It also includes seismic design criteria and requirements for use in the structural design of buildings (i.e., based on seismic hazard maps and the seismic design category) and specifies building components that require special seismic certification.

County

Los Angeles County Building Code

County-owned and operated capital projects are subject to review through the County's plan check process. Beginning January 1, 2014, all plans submitted for plan check will be checked in accordance with the 2014 County of Los Angeles Building Code (Title 26), Electrical Code (Title 27), Green Building Standards Code (Title 31), Mechanical Code (Title 29), Plumbing Code (Title 28), and Residential Code (Title 30). Title 26, Building Code, of the Los Angeles County Code adopts the California Building Code, with amendments to make it more stringent on some issues that directly affect the County.

4.5.2 EXISTING CONDITIONS

Geology

The site is located in the southwestern edge of the Antelope Valley, a triangular-shaped, 2,400-square-mile valley bound on the southwest by the San Gabriel Mountains; on the northwest by the Tehachapi Mountains; and on the east by a series of hills and buttes that generally follow the Los Angeles/San Bernardino County line. The Antelope Valley includes the northern portion of Los Angeles County; the southern portion of Kern County; and the western edge of San Bernardino County and is located at the southwestern part of the Mojave Desert.

The Mojave Desert includes over 25,000 square miles of rugged mountains and valleys in southern Nevada, western Arizona, southwestern Utah, and southeastern California. It is known as the High Desert and is located between the lower and hotter Sonoran desert to the south and the cooler and higher Great Basin Desert to the north. It is bound by the Tehachapi Mountains and Garlock Fault to the north and the San Gabriel and San Bernardino Mountains and the San Andreas Fault to the south.

The California Department of Conservation identifies the geologic structures underlying the site and the surrounding areas as Quaternary alluvium (Q), which are surficial deposits of Quaternary age (approximately 2.6 million years old or younger) (CDOC 2014b). The site is relatively flat, with ground elevations ranging from approximately 2,351 to 2,352 feet above mean sea level (msl) along 60th Street West to approximately 2,345 to 2,347 feet above msl along West Avenue I; approximately 2,345 feet above msl at the eastern guard tower; and approximately 2,348 feet above msl at the southern guard tower (Penfield and Smith 2014).

Soils

The Geohazard Study Report states that the site is located on deep alluvial sediments deposited by streams, floods, and winds along the northern flank of the San Gabriel Mountains and Ritter Ridge. Layers of high moisture and low density compressible clay, classified as Lacustrine Deposits (Qpl), were encountered throughout the site at depths ranging from 10 to 30 feet below the ground surface (bgs) (Converse 2014). Exhibit 4.5-3 shows the geologic map for the Project area.

As part of the Geohazard Study Report, 25 soil borings were made on site at depths ranging from 11.5 to 51.5 feet bgs. Soils consisted of existing fills (primarily silty sands) from two to seven feet thick and natural alluvial soils (clays, sands, and silty sand soils) beneath the fill. Parking lots are overlain by up to four inches of asphalt concrete and up to four inches of aggregate base.

The U.S. Department of Agriculture (USDA) Natural Resources Conservation Service (NRCS) identifies soils on the site as Tray sandy loam, saline-alkali (in the northern portion), and Pond loam (in the southwestern portion where the barracks of the Mira Loma Detention Center are located) (NRCS 2014).

Tray sandy loam is made up of light yellowish brown, very strongly alkaline, sandy loam on the surface and is underlain by yellowish brown, very strongly alkaline, heavy sandy loam, and light yellowish brown, very strongly and strongly alkaline, sandy loam. These soils are very strongly alkaline and slightly effervescent on the surface, but are strongly effervescent below the surface. These soils are also moderately well-drained; have very slow runoff; and have moderate permeability (NRCS 2014, 2003b).

Pond loam soils consist of light gray to light brownish gray, slightly hard clay loam on the surface up to 15 inches, with very pale brown sandy clay loam and very pale brown sandy loam in the subsurface. These soils are calcareous throughout; are moderately alkaline in the upper four inches and very strongly alkaline at lower depths; and developed in granitic alluvium. Pond soils are moderately well drained; runoff is slow to very slow; and permeability is slow to moderately slow (NRCS 2014, 2003a).

Both soils generally have high corrosivity for concrete and steel; low resistance for soil compaction; somewhat limited to very limited absorption for septic tank fields and sewage lagoons; very limited infiltration; and high wind erodibility (NRCS 2014).

The expansion index test for on-site soils indicate very low expansion potential. The resistance value (R-value) test provided that a relative measure of soil strength and soils within 5 feet had R-values ranging from 12 to 33. Soils were also tested for minimum electrical resistivity, hydrogen potential (pH), and chemical content (including chloride concentrations and soluble sulfate). These tests indicate that soils are corrosive to metals.

Seismicity

There is no known earthquake fault running through or near the site or projecting through the site (CDOC 2010). The closest known fault with surface expression is the Mojave Segment of the San Andreas Fault, approximately 6.4 miles south of the Project site. The San Andreas Fault ruptured on January 9, 1857, during the magnitude 7.9 earthquake in Fort Tejon. The earthquake rupture zone extended for nearly 220 miles from Parkfield in Monterey County to the north to the Cajon Pass in San Bernardino County to the south and produced up to 9 meters of horizontal ground offset.

The San Andreas Fault Zone is considered capable of producing a maximum moment magnitude (Mw) 7.8 earthquake. The anticipated peak ground acceleration from this fault is approximately 0.54g¹ for alluvial conditions and 0.53g for soft rock conditions at the Project site. Thus, the seismic hazard at the Project site is high.

The Hitchbrook Fault runs roughly parallel and north of the San Andreas Fault, 5.5 miles south of the site. This is a pre-Quaternary fault (older than 1.6 million years) or a fault without recognized Quaternary displacement. Other faults are located farther from the site and include the Rosamond Fault, Clearwater Fault, Garlock Fault, and Llano Fault (CDOC 2014a).

Liquefaction

Liquefaction is the sudden decrease in the strength of cohesionless soils due to dynamic or cyclic shaking. Saturated soils behave temporarily as a viscous fluid (liquefaction) and, consequently, lose their capacity to support structures. The potential for liquefaction decreases with increasing clay and gravel content, but increases as the ground acceleration and duration of shaking increase. Liquefaction potential has been found to be the greatest where both groundwater and loose sands occur within 50 feet of the ground surface.

While the State's Hazards Mapping Program does not identify liquefaction hazards at the site (it identifies liquefaction hazards immediately to the southeast), soil borings on the site encountered perched groundwater at 27 feet bgs at the northern portion of the site. Thus, liquefaction analysis was performed for the upper 50 feet bgs. The results of liquefaction analyses indicate that the Project site may be susceptible to liquefaction in areas of localized perched groundwater. The estimated potential liquefaction-induced settlement ranges from 0.22 to 2.08 inches, with potential differential settlement ranging from 0.11 to 1.04 inches.

4.5.3 THRESHOLDS OF SIGNIFICANCE

The following significance criteria are derived from the Environmental Checklist in Appendix G of the California Environmental Quality Act Guidelines. A project would result in a significant adverse impact related to Geology and Soils if it would:

Threshold 4.5a: Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving (i) rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Hazard Fault Map issued by the State Geologist for the area or based on other substantial evidence of a known fault; (ii) strong seismic ground shaking; (iii) seismic-related ground failure, including liquefaction; or (iv) landslides.

Threshold 4.5b: Result in substantial soil erosion or the loss of topsoil.

Threshold 4.5c: Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse.

Threshold 4.5d: Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property.

¹ Site acceleration during a seismic event is measured as a percent of gravity, or g. For instance, 0.54g is 54 percent of the force of gravity.

Threshold 4.5e: Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater.

4.5.4 REGULATORY REQUIREMENTS

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

4.5.5 ENVIRONMENTAL IMPACT ANALYSIS

Threshold 4.5a: **Would the project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving (i) rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault; (ii) strong seismic ground shaking; (iii) seismic related ground failure, including liquefaction; or (iv) landslides?**

Short-Term and Long-Term On-Site Impacts

Fault Rupture

There are no active or potentially active faults in or near the site, and the site is not located within the Alquist-Priolo Earthquake Fault Zone for the San Andreas Earthquake Fault (CDMG 1979). The closest known fault with surface expression is the Mojave Segment of the San Andreas Fault, approximately 6.4 miles south of the Project site. Therefore, the Project would not be exposed to surface rupture hazards.

Strong Seismic Ground Shaking

Implementation of the Project would have the potential to expose people and structures to strong ground shaking due to an earthquake in the San Andreas Fault Zone, along the Garlock Fault, and/or along other active faults in the Antelope Valley and the Southern California region (CDOC 2010).

The severity of ground shaking will depend on the magnitude of the earthquake; its distance to the site; and site geologic conditions. CBC seismic parameters were calculated to determine ground shaking at the site. From a 7.8 magnitude earthquake on the San Andreas Fault, the

anticipated peak ground acceleration would be approximately 0.54g for alluvial conditions and 0.53g for soft rock conditions at the Project site. This peak ground acceleration is considered high and could lead to the damage to structures and infrastructure; personal injury and death; and utility service disruption, fire, explosion, and hazardous material spills.

The CBC and County Building Code provide the appropriate building design criteria needed to protect the structural integrity of structures and infrastructure against damage and collapse (RR GEO-1). In accordance with Section 1803.2 of the 2013 CBC, a geotechnical investigation is required that must evaluate soil classification, slope stability, soil strength, position and adequacy of load-bearing soils, the effect of moisture variation on soil-bearing capacity, compressibility, liquefaction, and expansiveness, as necessary, determined by the County Building Official. The geotechnical investigation must be prepared by registered professionals (i.e., California Registered Civil Engineer or Certified Engineering Geologist). Recommendations of the report, as they pertain to structural design and construction recommendations for earthwork, grading, slopes, foundations, pavements, and other necessary geologic and seismic considerations, must be incorporated into the design and construction of the Project.

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

Seismic-Related Ground Failure, Including Liquefaction

The liquefaction analysis indicates that the Project site may be susceptible to liquefaction. The estimated liquefaction-induced settlement could range from 0.22 to 2.08 inches, with potential differential settlement ranging from 0.11 to 1.04 inches. As such, proposed structures and infrastructure on the Project site may be exposed to liquefaction hazards, including damage to foundations; settlement of aboveground structures; and uplift of buried structures and infrastructure. Prior to the completion of final engineering design plans, additional geotechnical exploration, lab testing, and analysis may be required for planned seismic upgrades to existing buildings in order to provide detailed design recommendations. The Project's structural design, which must be completed in accordance with the recommendations of the geotechnical investigation and subject to the County Building Official (see RR GEO-1) would address liquefaction hazards to prevent damage to foundations, structures, and infrastructure.

Seismic-Related Ground Failure, Including Landslides

The Project area has relatively flat topography (CDMG 2005) and the Project is unlikely to be exposed to or to cause landslides. The Project would retain the flat topography of the site; thus, the Project would not create or be exposed to landslide hazards. No impact would occur.

Threshold 4.5b: Would the project result in substantial soil erosion or the loss of topsoil?

Short-Term Construction Impacts

Demolition and construction activities on the Project site would lead to the temporary exposure of soils. The Project site is underlain by Tray sandy loam and Pond loam soils, which have slow to very slow runoff potential and moderate erosion potential. Any disturbed soils may be subject to wind and water erosion, and the Antelope Valley can experience very high winds during certain times of the year.

Construction activities are required to implement erosion-control, sediment-control, and tracking-control Best Management Practices (BMPs) as part of the Storm Water Pollution Prevention Plan (SWPPP) that is required under the State Water Resources Control Board's (SWRCB's) Construction General Permit (see RR HYD-1). Compliance with the Construction General Permit is discussed in Section 4.8, Hydrology and Water Quality. Dust-control measures would also be implemented (see RR AIR-1), as discussed in Section 4.2, Air Quality, and would reduce wind erosion. Accordingly, the Project would be required to implement erosion-control measures to reduce wind and water erosion and to minimize sediments and loose soils from entering public roadways, storm drain systems, and adjacent areas.

Therefore, implementation of RR HYD-1 from Section 4.8 and RR AIR-1 from Section 4.2 would prevent construction activities from resulting in significant adverse impacts associated with substantial soil erosion and/or loss of topsoil. Impacts relating to erosion would be less than significant and no mitigation is required.

Long-Term Operational Impacts

As the Project site would remain largely developed with structures, pavements, landscaped areas, driveways, and parking areas upon completion of construction activities, the potential for erosion on the Project site is low. The Project would maintain the impervious surfaces on site and would add new buildings and pavements on areas that are currently built over, landscaped, or have exposed soils. Therefore, the Project would not create new erosion hazards, nor would it increase existing hazards.

Upon completion of construction activities, any exposed soils would be covered with pavements, driveways, buildings, and landscaping, which would reduce long-term soil erosion potential from both wind and water. Impacts relating to erosion would be less than significant. No mitigation is required.

Threshold 4.5c: Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?

Short-Term and Long-Term On-Site Impacts

As indicated earlier, the site is relatively flat, and there are no landslide hazards on or near the site. There is a potential for liquefaction due to the presence of perched groundwater, but compliance with RR GEO-1 would ensure that the potential for liquefaction hazards would be less than significant.

Seismically induced lateral spreading primarily involves lateral movement of earth materials due to ground shaking. It differs from slope failure in that complete ground failure involving large movement does not occur due to the relatively smaller gradient of the initial ground surface. Lateral spreading is demonstrated by near-vertical cracks with predominantly horizontal movement of the soil mass. The topography at the Project site and the surrounding area is relatively flat, with no nearby descending slopes or embankments. Thus, the potential for lateral spreading is negligible.

Subsidence is the settlement of the ground when large amounts of groundwater or oil have been withdrawn from underlying sediments; when underlying limestone deposits dissolve; or from the oxidation of organic soils. Subsidence may cause damage to the overlying structure due to differential settlement. The City of Lancaster has indicated that subsidence has occurred in the City and in the Antelope Valley (Lancaster 2009a, 2009b).

Collapsible soils are soils that shrink when the pore spaces become saturated with water, causing the loss of grain-to-grain contact. The weight of overlying structures can cause uniform or differential settlement and can lead to the damage of foundations and walls. Collapses of the ground surface may occur when the rock below the surface is naturally dissolved by groundwater, leading to sinkholes. The City of Lancaster has identified sinkholes and fissures in the City that include areas to the northeast of the site (Lancaster 2009b). The soil testing has also identified an approximately 10-foot-thick layer of compressible clayey soils at the site starting at approximately 15 to 20 feet bgs.

As required by RR GEO-1, prior to the completion of final engineering design plans, the Project's design and construction must be conducted with consideration of the effects of potential subsidence and collapsible soils. This could include remedial grading in specific areas to prepare the site to support the proposed structures; to provide a relative uniform-bearing material below shallow foundations; and/or to allow for over-excavation and re-compaction of below planned foundations. Compliance with RR GEO-1 would ensure that the potential for impacts associated with subsidence and collapsible soils would be less than significant.

In summary, the County's building regulations provide building design criteria to protect the structural integrity of structures and infrastructure against geologic hazards. The CBC and County Building Code require the preparation of a geotechnical investigation to identify the geologic characteristics on specific locations where structures and infrastructure are proposed and to develop engineering and structural recommendations and measures, prepared by registered professionals (i.e., California Registered Civil Engineer or Certified Engineering Geologist), including measures to reduce hazards from liquefaction, subsidence, and collapsible soils, and other soil characteristics so as to maintain structural integrity of the Project. Impacts would be less than significant and no mitigation is required.

Threshold 4.5d: Would the project be located on expansive soil, as defined in Section 1802.3.2 of the 2007 California Building Code, creating substantial risks to life or property?

Short-Term and Long-Term On-Site Impacts

Expansive soils are generally associated with soils that are susceptible to significant changes in volume due to expansion under wet conditions and contraction under dry conditions. Depending on the degree of soil expansion, volume changes (shrink and swell) can cause severe damage to slabs, foundations, and concrete flatwork. The Geohazard Study indicates that the upper five feet of soils on the site are not considered expansive. Thus, the Project would not be exposed to soil expansion hazards. No impacts would occur and no mitigation is required for expansive soils.

Soil corrosivity tests indicate that the minimum saturated resistivity of on-site soils is in the corrosive range to ferrous metals. Compliance with RR GEO-1 would ensure that underground metal pipes would be protected to avoid damage of underground building components and infrastructure. Compliance with RR GEO-1 would ensure that potential metal corrosion and/or damage to steel and wire reinforcement bars, utility lines, and other metal pipes and building components would be less than significant.

Threshold 4.5e: Does the planning area have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?

Short-Term and Long-Term On-Site Impacts

Sewer services to the site are provided by the Los Angeles County Sanitation District No. 14 through a 12- to 15-inch sewer line on West Avenue I that is tapped by a 12-inch sewer line extending south and southwesterly to serve the existing MLDC and the HDHS MACC (DLR Group 2014). The sewer line on West Avenue I connects to the 36-inch Avenue I West trunk line that starts near 50th Street West and continues east to join Trunk F that conveys wastewater to the District's Lancaster Water Reclamation Plant (Lancaster 2005). The Project would be served by the existing sewer lines that convey sewage and wastewater to County Sanitation District No. 14 facilities. Therefore, no septic tanks or alternative wastewater disposal systems are needed to serve the Project. No impacts would occur and no mitigation is required.

4.5.6 CUMULATIVE IMPACTS

The impacts associated with the geologic and seismic characteristics of the site typically have little, if any, cumulative relationship with the impacts of other development projects on separate sites. As such, the Project would not alter the geologic events or soil characteristics (such as groundshaking, seismic intensity, or soil expansion) at another site, nor would it change the geologic conditions or hazards at an off-site location.

However, geologic and seismic conditions are regional in nature and affect large areas, rather than individual parcels. Therefore, the Project, as well as cumulative projects in the surrounding area and in the Antelope Valley, would be subject to the same geologic hazards created by earthquake faults (e.g., ground shaking); the local geology (e.g., liquefaction); and other areawide geologic issues (i.e., subsidence).

Compliance with applicable State and local building regulations would be required of all development in the Antelope Valley. Individual projects would be designed and built in accordance with applicable standards in the CBC and the individual building regulations of local jurisdictions (see RR GEO-1), including pertinent seismic design criteria. Site-specific geologic hazards would be addressed by the Engineering Geologic Report, Supplemental Ground-Response Report, and/or Geotechnical Report required for each development project. These geologic investigations would identify the specific geologic and seismic characteristics on a site and provide guidelines for engineering design and construction to maintain the structural integrity of proposed structures and infrastructure. Therefore, compliance with applicable State and local building regulations and standard engineering practices related to seismic and geologic hazard reduction would prevent significant cumulative adverse impacts associated with geologic and seismic hazards.

Development projects in the Antelope Valley would have to connect to the public sewer system where available, as required under the California Plumbing Code (Part 5 of the California Building Code, Section 713.2). In areas where public sewer service is unavailable, development may utilize septic tanks or alternative wastewater disposal systems, subject to the requirements of the

SWRCB and the Los Angeles County Public Health Department, Environmental Health Division. These requirements include a geologic assessment and percolation tests that would determine the ability of local soils to support septic systems. Therefore, compliance with applicable State and local building regulations and standard engineering practices would prevent significant cumulative adverse impacts relating to soils incapable of supporting septic systems.

Impacts of the Project and other development projects on geology and soils would not be cumulatively considerable, with compliance with existing regulations and implementation of site-specific mitigation measures.

4.5.7 MITIGATION MEASURES

No significant adverse impacts related to geology, seismicity, and soils would occur. Therefore, no mitigation measures are required.

4.5.8 LEVEL OF SIGNIFICANCE AFTER MITIGATION

Direct, indirect, and cumulative impacts related to geology and soils would be less than significant and no mitigation is required.

4.5.9 REFERENCES

California Department of Conservation (CDOC), 2014a (June 26, date accessed). 2010 Fault Activity Map of California. Sacramento, CA: CDOC. <http://www.quake.ca.gov/gmaps/FAM/faultactivitymap.html>.

———. 2014b (June 26, date accessed). 2010 Geologic Map of California. Sacramento, CA: CDOC. <http://www.quake.ca.gov/gmaps/GMC/stategeologicmap.html>.

———. 2010. *An Explanatory Text to Accompany the Geologic Map of California*. Sacramento, CA: CDOC.

———. 2005 (February 11). *Seismic Hazard Zones – Lancaster West Quadrangle*. Sacramento, CA: CDOC.

California Department of Conservation, Division of Mines and Geology (CDMG). 2005. *Seismic Hazard Zone Report for the Lancaster West 7.5-Minute Quadrangle, Los Angeles County, California* (Seismic Hazard Zone Report 095). Sacramento, CA: CDMG. http://gmw.consrv.ca.gov/shmp/download/evalrpt/lancw_eval.pdf.

———. 1979 (January 1). *Special Studies Zones for Sleepy Valley, Del Sur, and Ritter Ridge Quadrangles*. Sacramento, CA: CDMG.

Converse Consultants (Converse). 2014 (June). *Geohazard Study Report Mira Loma Detention Center, 45100 North 60th Street West, Lancaster, California*. Monrovia, CA: Converse.

DLR Group. 2014 (September 30). *Design Criteria Document*. Santa Monica, CA: DLR Group.

Lancaster, City of. 2009a (July 14, adopted). *City of Lancaster General Plan 2030*. Lancaster, CA: the City. <http://www.cityoflancasterca.org/Index.aspx?page=427>.

———. 2009b (April). *General Plan 2030 Master Environmental Assessment*. Lancaster, CA: City of. <http://www.cityoflancasterca.org/Modules/ShowDocument.aspx?documentid=11352>.

- . 2005. Overview Map of District Sewers in Lancaster. Lancaster, CA: the City.
- Los Angeles, County of. 2013. *Los Angeles County, California Code of Ordinances*. Tallahassee, FL: Municode Corporation for the County. <http://library.municode.com/index.aspx?clientId=16274>.
- Penfield and Smith. 2014 (June 4). Topographic Map – Mira Loma Detention Center, Lancaster, California. Camarillo, CA: Penfield and Smith
- U.S. Department of Agriculture Natural Resources Conservation Service (NRCS). 2014 (June 26, date accessed). Web Soil Survey. Antelope Valley Area. Lancaster, CA: NRCS. <http://websoilsurvey.nrcs.usda.gov/app/WebSoilSurvey.aspx>.
- . 2003a (March). Official Soil Series Descriptions - Pond Series. Washington, D.C.: NRCS.
- . 2003b (January). Official Soil Series Descriptions - Tray Series. Washington, D.C.: NRCS.

This page intentionally left blank

4.6 GREENHOUSE GAS EMISSIONS

This section addresses greenhouse gas (GHG) emissions anticipated from construction and operation of the proposed Project and its potential global climate change impacts. This section also provides mitigation measures, proposed to reduce the potential GHG cumulative impacts to less than significant levels. The Project's estimated construction and operational GHG emissions were calculated by using the California Emissions Estimator Model (CalEEMod, Version 2013.2.2); the inputs and data for the Project are included in Appendix B.

4.6.1 RELEVANT POLICIES AND REGULATIONS

Federal

U.S. Environmental Protection Agency Findings

On December 7, 2009, the U.S. Environmental Protection Agency (USEPA) Administrator signed two distinct findings regarding GHGs under section 202(a) of the Clean Air Act (CAA). The findings state:

- **Endangerment Finding:** The Administrator finds that the current and projected concentrations of the six key well-mixed greenhouse gases—carbon dioxide (CO₂), methane (CH₄), nitrous oxide (N₂O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and sulfur hexafluoride (SF₆)—in the atmosphere threaten the public health and welfare of current and future generations.
- **Cause or Contribute Finding:** The Administrator finds that the combined emissions of these well-mixed greenhouse gases from new motor vehicles and new motor vehicle engines contribute to the greenhouse gas pollution which threatens public health and welfare.

These findings do not themselves impose any requirements on industry or other entities. However, this action is a prerequisite to finalizing the USEPA's proposed GHG emission standards for light-duty vehicles (USEPA 2010a). A light-duty vehicle is defined as a passenger car capable of seating 12 passengers or less (USEPA 2015b).

Light-Duty Vehicle Greenhouse Gas Emissions Standards and Corporate Average Fuel Economy Standards

The USEPA and the Department of Transportation's National Highway Traffic Safety Administration (NHTSA) have been working together on developing a National Program of regulations to reduce GHG emissions and to improve the fuel economy of light-duty vehicles. On April 1, 2010, the USEPA and NHTSA announced a joint Final Rulemaking establishing standards for 2012 through 2016 model year vehicles. This was followed up on October 15, 2012, when the agencies issued a Final Rulemaking with standards for model years 2017 through 2025. The rules require these vehicles to meet an estimated combined average emissions level of 295 grams of CO₂ per mile by 2012, decreasing to 250 grams per mile by 2016, and finally to an average industry fleet-wide level of 163 grams per mile in model year 2025. The 2016 standard is equivalent to 35.5 miles per gallon (mpg) and the 2025 standard is equivalent to 54.5 mpg if the levels were achieved solely through improvements in fuel efficiency. The agencies expect, however, that a portion of these improvements will occur due to air conditioning technology improvements (i.e., they will leak less) and due to the use of alternative refrigerants, which would not contribute to fuel economy. These standards would cut GHG emissions by an estimated 2 billion metric tons and 4 billion barrels of oil over the lifetime of the vehicles sold under the program (model years 2017–2025). The combined USEPA GHG standards and NHTSA

Corporate Average Fuel Economy (CAFE) standards resolve previously conflicting requirements under both federal programs and the standards of the State of California and other states that have adopted the California standards (USEPA 2010b; USEPA and NHTSA 2012).

State

The California Air Resources Board (CARB), a part of the California Environmental Protection Agency (CalEPA), is responsible for the coordination and administration of both federal and State air pollution control programs in California. There are numerous State plans, policies, regulations, and laws related to GHGs and global climate change. Following is a brief discussion of the plans, policies, and regulations most relevant to the Project (presented in approximate chronological order).

Clean Car Standards (Assembly Bill 1493)

Assembly Bill (AB) 1493, adopted September 2002, also known as Pavley I, requires the development and adoption of regulations to achieve the maximum feasible reduction of GHGs emitted by noncommercial passenger vehicles, light-duty trucks, and other vehicles used primarily for personal transportation in the State. Although setting emissions standards on automobiles is solely the responsibility of the USEPA, the Federal Clean Air Act allows California to set State-specific emission standards on automobiles if the State first obtains a waiver from the USEPA. The USEPA granted California that waiver on July 1, 2009. The emission standards become increasingly more stringent through the 2016 model year. California is also committed to further strengthening these standards beginning in 2017 to obtain a 45 percent GHG reduction from 2020 model year vehicles (CARB 2009).

Executive Order S-3-05

On June 1, 2005, Governor Arnold Schwarzenegger signed Executive Order S-3-05, which proclaims that California is vulnerable to the impacts of climate change. It declares that increased temperatures could reduce snowpack in the Sierra Nevada Mountains; could further exacerbate California's air quality problems; and could potentially cause a rise in sea levels. In an effort to avoid or reduce the impacts of climate change, Executive Order S-3-05 calls for a reduction in GHG emissions to the year 2000 level by 2010, to year 1990 levels by 2020, and to 80 percent below 1990 levels by 2050.

The California Global Warming Solutions Act of 2006 (Assembly Bill 32)

The California Legislature adopted the public policy position that global warming is "a serious threat to the economic well-being, public health, natural resources, and the environment of California" (*California Health and Safety Code*, Section 38501). Further, the State Legislature has determined that:

the potential adverse impacts of global warming include the exacerbation of air quality problems, a reduction in the quality and supply of water to the state from the Sierra Nevada snowpack, a rise in sea levels resulting in the displacement of thousands of coastal businesses and residences, damage to marine ecosystems and the natural environment, and an increase in the incidences of infectious disease, asthma, and other human health-related problems.

The State Legislature also states that:

Global warming will have detrimental effects on some of California's largest industries, including agriculture, wine, tourism, skiing, recreational and commercial fishing, and forestry. It will also increase the strain on electricity supplies necessary to meet the demand for summer air-conditioning in the hottest parts of the State (*California Health and Safety Code*, Section 38501).

These public policy statements became law with the enactment of Assembly Bill (AB) 32, the California Global Warming Solutions Act of 2006, signed by Governor Arnold Schwarzenegger in September 2006. AB 32 is now codified as Sections 38500 through 38599 of the *California Health and Safety Code*.

AB 32 requires that statewide GHG emissions be reduced to 1990 levels by 2020. This reduction is to be accomplished through an enforceable statewide cap on GHG emissions to be phased in starting in 2012. AB 32 directs CARB to establish this statewide cap based on 1990 GHG emissions levels; to disclose how it arrived at the cap; to institute a schedule to meet the emissions cap; and to develop tracking, reporting, and enforcement mechanisms. Emissions reductions under AB 32 are to include carbon sequestration projects and best management practices that are technologically feasible and cost effective. As of February 2015, CARB had not promulgated GHG emissions or reporting standards that are directly applicable to the Project.

Senate Bill 97 and Amendments to the California Environmental Quality Act Guidelines

Senate Bill (SB) 97 directed the California Natural Resources Agency (CNRA) to adopt amendments to the California Environmental Quality Act (CEQA) Guidelines that require evaluation of GHG emissions or the effects of GHG emissions by January 1, 2010. The CNRA has done so, and the amendments to the CEQA Guidelines, in a new Section 15064.4, entitled Determining the Significance of Impacts from Greenhouse Gas Emissions, provide that:

- a) The determination of the significance of greenhouse gas emissions calls for a careful judgment by the lead agency consistent with the provisions in Section 15064. A lead agency should make a good-faith effort, based on available information, to describe, calculate or estimate the amount of greenhouse gas emissions resulting from a project. A lead agency shall have discretion to determine, in the context of a particular project, whether to:
 - 1) Use a model or methodology to quantify greenhouse gas emissions resulting from a project, and which model or methodology to use. The lead agency has discretion to select the model it considers most appropriate provided it supports its decision with substantial evidence. The lead agency should explain the limitations of the particular model or methodology selected for use; or
 - 2) Rely on a qualitative analysis or performance based standards.
- b) A lead agency should consider the following factors, among others, when assessing the significance of impacts from greenhouse gas emissions on the environment:
 - 1) The extent to which the project may increase or reduce greenhouse gas emissions as compared to the existing environmental setting;
 - 2) Whether the project emissions exceed a threshold of significance that the lead agency determines applies to the project;

- 3) The extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of greenhouse gas emissions. Such requirements must be adopted by the relevant public agency through a public review process and must reduce or mitigate the project's incremental contribution of greenhouse gas emissions. If there is substantial evidence that the possible effects of a particular project are still cumulatively considerable notwithstanding compliance with the adopted regulations or requirements, an EIR must be prepared for the project.

The guideline amendments also add a new Section 15126.4(c), Mitigation Measures Related to Greenhouse Gas Emissions. Generally, this State CEQA Guidelines section requires lead agencies to consider feasible means—supported by substantial evidence and subject to monitoring or reporting—of mitigating the significant effects of GHG emissions. Potential measures to mitigate the significant effects of GHG emissions are identified, including examples such as those outlined in Appendix F, Energy Conservation, of the State CEQA Guidelines.

California Air Resources Board Scoping Plan

CARB approved a *Climate Change Scoping Plan* as required by AB 32. The *Climate Change Scoping Plan* proposes a “comprehensive set of actions designed to reduce overall carbon GHG emissions in California, improve our environment, reduce our dependence on oil, diversify our energy sources, save energy, create new jobs, and enhance public health” (CARB 2008). The *Climate Change Scoping Plan* has a range of GHG reduction actions which include direct regulations; alternative compliance mechanisms; monetary and non-monetary incentives; voluntary actions; market-based mechanisms such as a cap-and-trade system; and an AB 32 implementation regulation to fund the program.

The *Climate Change Scoping Plan* calls for a “coordinated set of solutions” to address all major categories of GHG emissions. Transportation emissions will be addressed through a combination of higher standards for vehicle fuel economy; implementation of the Low Carbon Fuel Standard; and greater consideration for reducing trip length and generation through land use planning and transit-oriented development. Buildings, land use, and industrial operations will be encouraged and, sometimes, required to use energy more efficiently. Utility energy supplies will change to include more renewable energy sources through implementation of the Renewables Portfolio Standard. This will be complemented with emphasis on local generation, including rooftop photovoltaics and solar hot water installations. Additionally, the *Climate Change Scoping Plan* emphasizes opportunities for households and businesses to save energy and money through increasing energy efficiency. It indicates that substantial savings of electricity and natural gas will be accomplished through “improving energy efficiency by 25 percent” (CARB 2008).

The *Climate Change Scoping Plan* identifies a number of specific issues relevant to the Project, including those listed below:

- The potential of using the green building framework as a mechanism that could enable GHG emissions reductions in other sectors (e.g., electricity, natural gas), noting that green buildings “exceed minimum energy efficiency standards, decrease consumption of potable water, reduce solid waste during construction and operation, and incorporate sustainable materials. Combined, these measures can also contribute to healthy indoor air quality, protect human health, and minimize impacts to the environment”.
- The importance of increasing the supply and utilization of green power and lower carbon intensity energy sources. Broadly defined, this includes implementation of the utility-based

Renewables Portfolio Standard (RPS), which requires that, by 2017, 20 percent of the available energy supplies are from renewable energy sources, such as use of solar hot water heating; support for the Million Solar Roofs Program; and increased use of combined heat and power.

- The importance of supporting the Department of Water Resources' work to implement the Governor's objective to reduce per capita water use by 20 percent by 2020. Specific measures to achieve this goal include water use efficiency, water recycling, and reuse of urban runoff. The *Climate Change Scoping Plan* notes that water use requires significant amounts of energy, including approximately $\frac{1}{5}$ of statewide electricity.
- Encouragement of local governments to set quantifiable emissions reduction targets for their jurisdictions and use their influence and authority to encourage reductions in emissions caused by energy use, waste and recycling, water and wastewater systems, transportation, and community design.

Senate Bill 375

Signed September 30, 2008, Senate Bill (SB) 375 provides for a new planning process to coordinate land use planning and regional transportation plans and funding priorities in order to help California meet the GHG reduction goals established in AB 32. SB 375 requires Metropolitan Planning Organizations, including the Southern California Association of Governments (SCAG), to incorporate a Sustainable Communities Strategy (SCS) in their regional transportation plans that will achieve GHG emission reduction targets set by CARB. There are two mutually important facets to SB 375: reducing vehicle miles traveled (VMT) and encouraging more compact, complete, and efficient communities for the future. SB 375 also includes provisions for exemptions from or streamlined CEQA review for projects classified as transit priority projects (SCAG 2012).

Executive Order B-30-15

On April 29, 2015, Governor Brown signed Executive Order (EO) B-30-15, which orders "A new interim statewide greenhouse gas emission reduction target to reduce greenhouse gas emissions to 40 percent below 1990 levels by 2030 is established in order to ensure California meets its target of reducing greenhouse gas emissions to 80 percent below 1990 levels by 2050" (COOG 2015). EO B-30-15 also directs CARB to update the Climate Change Scoping Plan to express the 2030 target in terms of million metric tons of carbon dioxide equivalent.

Title 24, Part 6, Energy Efficiency Standards

The Energy Efficiency Standards for Residential and Nonresidential Buildings (Title 24, Part 6 of the *California Code of Regulations* [CCR]) were established in 1978 in response to a legislative mandate to reduce California's energy consumption. The California Energy Commission (CEC) adopted the 2008 changes to the Building Energy Efficiency Standards in order to (1) "Provide California with an adequate, reasonably-priced, and environmentally-sound supply of energy" and (2) "Respond to Assembly Bill 32, the Global Warming Solutions Act of 2006, which mandates that California must reduce its greenhouse gas emissions to 1990 levels by 2020". Title 24 Part 6 of the 2013 California Building Standards Code, the 2013 California Energy Code, went into effect on July 1, 2014, and includes energy efficiency updates (CBSC 2015).

Title 24, Part 11, Green Building Standards

The 2013 California Green Building Standards Code (24 CCR, Part 11) is a code with mandatory requirements for new residential and nonresidential buildings (including buildings for retail, office, public schools and hospitals) throughout California. The code is Part 11 of the California Building

Standards Code in Title 24 of the *California Code of Regulations*, and is also known as the CALGreen Code (CBSC 2015).

The development of the CALGreen Code is intended to (1) cause a reduction in greenhouse gas emissions from buildings; (2) promote environmentally responsible, cost-effective, healthier places to live and work; (3) reduce energy and water consumption; and (4) respond to the directives by the Governor. In short, the code is established to reduce construction waste, make buildings more efficient in the use of materials and energy, and reduce environmental impact during and after construction. The CALGreen Code contains requirements for construction site selection; storm water control during construction; construction waste reduction; indoor water use reduction; material selection; natural resource conservation; site irrigation conservation; and more. The code provides for design options allowing the designer to determine how best to achieve compliance for a given site or building condition. The code also requires building commissioning, which is a process for verifying that all building systems (e.g., heating and cooling equipment and lighting systems) are functioning at their maximum efficiency.

California Air Pollution Control Officers Association

The California Air Pollution Control Officers Association (CAPCOA) is the association of Air Pollution Control Officers representing all 35 local air quality agencies throughout California. CAPCOA is not a regulatory body, but has been an active organization in providing guidance in addressing the CEQA significance of GHG emissions and climate change as well as other air quality issues.

The August 2010 CAPCOA publication, *Quantifying Greenhouse Gas Mitigation Measures, A Resource for Local Government to Assess Emission Reductions from Greenhouse Gas Mitigation Measures* provides guidance on the quantification of project-level mitigation of GHGs associated with land use, transportation, energy use, and other related project areas (CAPCOA 2010). The guidance includes detailed procedures about the approaches to assessing and calculating the GHG emissions reductions associated with project design features and mitigation measures. This publication's methods are used in the California Emissions Estimator Model (CalEEMod) computer model that is used to calculate GHG emissions.

Regional

Antelope Valley Air Quality Management District (AVAQMD)

The Project site lies within the boundaries of the AVAQMD. The AVAQMD is bound by the Kern County-Los Angeles County border to the north, the Los Angeles County-San Bernardino County border to the east, and the South Coast Air Quality Management District (SCAQMD) border to the south and southwest. The portion of the site under the jurisdiction of the AVAQMD lies within the Mojave Desert Air Basin (MDAB). The mission of the AVAQMD is to protect the people and the environment of the Antelope Valley from the effects of air pollution through developing and implementing programs and regulations to improve air quality (AVAQMD 2015).

Countywide Environmental Policies

On June 30, 2015, the Board of Supervisors provided direction and guidelines through the Countywide Environmental Sustainability Policy for the development of a County Sustainability Council (CSC) and Sustainability Program Framework. In summary, the CSC's responsibilities are to develop metrics to provide County services in an environmentally sustainable manner, track progress toward accomplishments, facilitate intra-departmental collaboration, acquire funding for sustainability programs, and incorporate environmental justice into sustainability programs. The

Framework and its goals and objectives will be developed by the CSC to ensure that the County operates in ways that reduce consumption of energy sources, enhance environmental justice, and protect natural resources (ISD 2015).

The Countywide Energy and Environmental Policy (Policy) was adopted by the Los Angeles County Board of Supervisors on January 16, 2007, to provide guidelines for the development and enhancement of energy conservation and environmental programs within County departments. The Policy was also the County's response for the need for energy conservation and reduction in GHG emissions. It directs the County to track its GHG emissions with the California Climate Action Registry, and to reduce its facilities' energy consumption by 20 percent by the year 2015.

Additionally, the County has pledged to be a "Cool County" by establishing a GHG emissions footprint; developing a GHG mitigation plan; working with local entities to reduce regional GHGs by 80 percent by 2050; and supporting federal legislation to raise CAFE standards. In addition, the County has implemented various internal programs on energy conservation; water conservation; waste reduction and recycling; green purchasing and contracting; and alternative fuel vehicle purchasing. On January 13, 2009, the County created an action plan for developing a Comprehensive Renewable Energy Program to develop renewable energy projects on existing County facilities and properties.

Los Angeles County Green Building Standards Code (Title 31)

In November 2013, the Board of Supervisors adopted the Los Angeles County Green Building Standards Code (Title 31) in response to the mandates set forth in the CALGreen Code (2010 Green Building Standards Code). Title 31 became effective on January 1, 2014. Title 22 (Planning and Zoning Code) Drought Tolerant Landscaping requirements are now found in Title 31. The purpose of Title 31 is to improve public health, safety, and general welfare by enhancing the design and construction of buildings through the use of building concepts having a reduced negative impact, or positive environmental impact, and encouraging sustainable construction practices in planning and design; energy efficiency; water efficiency and conservation; material conservation and resource efficiency; and environmental air quality (Title 31 of the Los Angeles County Code). Notably, Title 31 requires all new buildings equal to or greater than 25,000 square feet (sf) to comply with the CALGreen Code (specifically, Section A5.601.2.4, Nonresidential Voluntary Measures for CALGreen Tier 1). These measures include, but are not limited to requirements for energy efficiency, parking for fuel-efficient vehicles, cool roofs, reduction of indoor potable water use, recycled content of construction materials, reduction in construction and demolition waste, and thermal insulation.

The County's drought-tolerant landscaping requirements establish minimum standards for the design and installation of landscaping using drought-tolerant plants and native plants that require minimal use of water. These requirements include the following: (1) a minimum of 75 percent of total landscaped area must utilize non-invasive drought-tolerant plant and tree species appropriate for the climate zone region; (2) a maximum of 25 percent of landscaped areas may be turf grass; and (3) hydrozoning irrigation techniques shall be incorporated into the landscape design. Title 31 also establishes development standards for new construction that would conserve water, energy, and natural resources; divert waste from landfills; minimize impacts to existing infrastructure; and promote a healthier environment.

Title 22 of the Los Angeles County Code

Green Building Ordinance (Section 22.52.2130)

The purpose of the Green Building Ordinance is to establish green building development standards for new projects. Green building practices are intended to conserve water, energy, and natural resources; divert waste from landfills; minimize impacts to existing infrastructure; and promote a healthier environment. Additional Green Building Requirements state that for a hotel/motel, lodging house, non-residential or mixed-use building, or first-time tenant improvement, with a gross floor area of at least 10,000 sf but less than 25,000 sf, the project applicant shall retain a LEED-accredited professional or other green building professional, approved by the Director and the Director of Public Works, to be part of the project design team. In addition, the project shall achieve the equivalency of LEED certification, either through U.S. Green Building Council (USGBC) certification or through an equivalency determination by Public Works.

For a hotel/motel, lodging house, non-residential or mixed-use building, or first-time tenant improvement project with a gross floor area greater than 25,000 sf or for a high-rise building greater than 75 feet in height, the project applicant shall retain a LEED-accredited professional or other green building professional approved by the Director and the Director of Public Works to be part of the project design team. In addition, the project shall achieve the equivalency of a LEED Silver certification, either through USGBC certification or through an equivalency determination by Public Works. The building design submitted to Public Works shall show all of the building elements that will be used to achieve the certification or equivalency determination (Title 22.52.20 of the Los Angeles County Code).

Drought-Tolerant Landscaping (Section 22.52.2200)

The purpose of the Drought-Tolerant Landscaping requirements is to establish minimum standards for the design and installation of landscaping using drought-tolerant plants and native plants that require minimal use of water. These requirements will help conserve water resources by requiring landscaping that is appropriate to the region's climate and to the nature of a project's use. The requirements include the following: (1) a minimum of 75 percent of the total landscaped area shall contain plants from the drought-tolerant plant list; (2) a maximum of 25 percent of the total landscaped area shall consist of turf, but in no event shall the turf be planted in strips that are less than 5 feet wide and in no event shall the total landscaped area contain more than 5,000 sf of turf; (3) all turf in such total landscaped area shall be water-efficient (the green building technical manual shall contain a list of turf that meets this requirement); and (4) the plants in such total landscaped area shall be grouped in hydrozones in accordance with their respective water, cultural (soil, climate, sun, and light), and maintenance requirements (Title 22.52.2200 of the Los Angeles County Code).

On June 25 and December 17, 2014, the Regional Planning Commission held public hearings on the proposed Tree Planting Ordinance that would amend Title 21 (Subdivisions) and Title 22 (Planning and Zoning) of the Los Angeles County Code to repeal the Drought-Tolerant Landscaping and Green Building requirements of Sections 21.24.430 and 21.24.440 and Parts 20 and 21 of Chapter 22.52 that are now found in Title 31, in order to establish tree planting requirements for new projects (LACDRP 2014c). The Board of Supervisors Hearing has been held off indefinitely (LACDRP 2015a).

4.6.2 EXISTING CONDITIONS

Global Climate Change and Greenhouse Gases

Climate change is a recorded change in the Earth's average weather measured by variables such as wind patterns, storms, precipitation, and temperature. Historical records show that global temperature changes have occurred naturally in the past, such as during previous ice ages. The year 2014 ranks as Earth's warmest year since 1880, and the 10 warmest years in the instrumental record, with the exception of 1998, have now occurred since 2000. The average global temperature has risen about 1.4 degrees Fahrenheit (°F) (0.8 degrees Celsius [°C]) since 1880 (NASA 2015).

The global atmospheric concentration of CO₂ has increased from a pre-industrial (roughly 1750) value of about 280 parts per million (ppm) to a peak of 403.26 ppm and a seasonally adjusted 400.57 ppm in April 2015, primarily due to fossil fuel use, with land use change providing a significant but smaller contribution. The annual CO₂ concentration growth rate during the ten-year period between 1995 and 2005 was larger than the growth rate from the beginning of continuous direct measurements in 1960 to 2005 (ESRL 2015).

Greenhouse Gases

GHGs are global pollutants and are therefore unlike criteria air pollutants such as ozone (O₃), particulate matter (PM₁₀ and PM_{2.5}), and toxic air contaminants (TACs), which are pollutants of regional and local concern (see Section 4.2, Air Quality, of this EIR). While pollutants with localized air quality effects have relatively short atmospheric lifetimes (generally on the order of a few days), GHGs have relatively long atmospheric lifetimes, ranging from one year to several thousand years. Long atmospheric lifetimes allow for GHGs to disperse around the globe. Therefore, GHG effects are global, as opposed to the local and/or regional air quality effects of criteria air pollutant and TAC emissions.

As stated above, GHGs, as defined under California's AB 32, include CO₂, CH₄, N₂O, HFCs, PFCs, and SF₆. GHGs vary widely in the power of their climatic effects; therefore, climate scientists have established a unit called global warming potential (GWP). The GWP of a gas is a measure of both potency and lifespan in the atmosphere as compared to CO₂. For example, as CH₄ and N₂O are approximately 21 and 310 times (respectively) more powerful than CO₂ in their ability to trap heat in the atmosphere, they have GWPs of 21 and 310, respectively (CO₂ has a GWP of 1). Carbon dioxide equivalent (CO₂e) is a quantity that enables all GHG emissions to be considered as a group despite their varying GWP. The GWP of each GHG is multiplied by the prevalence of that gas to produce CO₂e.

General Environmental Effects of Global Climate Change

Executive Order S-3-05 mandates the preparation of biennial science assessment reports on climate change impacts and adaptation options for California. Executive Order S-13-08 directs the CNRA to develop a State Climate Adaptation Strategy and to provide State land use planning guidance related to sea level rise and other climate change impacts. Current reports resulting from these directed actions are the *Climate Action Team Report to the Governor and Legislature* and the *California Climate Adaptation Strategy* (CalEPA 2010; CNRA 2009b). These studies report that global warming in California is anticipated to impact resources including, but not limited to, those discussed below:

- **Public Health.** Many Californians currently experience the worst air quality in the nation, and climate change is expected to make matters worse. Higher temperatures would

increase the frequency, duration, and intensity of conditions conducive to air pollution formation. If global background ozone (O₃) levels increase as predicted under some scenarios, it may become impossible to meet local air quality standards. Air quality could be further compromised by more frequent wildfires, which emit fine particulate matter that can travel long distances. Rising temperatures and more frequent heat waves would increase the risk of death from dehydration, heat stroke/exhaustion, heart attack, stroke, and respiratory distress. Climate change may also increase asthma rates and the spread of infectious diseases and their vectors, as well as challenge food and water supplies. Children, the elderly, people with chronic heart or lung disease, outdoor workers, people who exercise outdoors and the economically disadvantaged would be particularly vulnerable to these changes. In addition, more frequent extreme weather events could also result in increased injuries and deaths from these phenomena.

- **Energy.** Increasing mean temperature and more frequent heat waves will drive up demand for cooling in summer; this new energy demand will only be partially offset by decreased demand for heating in winter. Hydropower, which currently provides 15 percent of in-state generation, would be threatened by declining snowpack, which serves as a natural reservoir for hydropower generation in the spring and summer. Winter storms, earlier snowmelt, and greater runoff may combine to cause flooding, which could, in turn, damage transmission lines and cause power outages.
- **Water Resources.** Rising temperatures, less precipitation, and more precipitation falling as rain instead of snow could severely diminish snowpack. Because the Sierra Nevada snowpack provides most of California's available water, this potential loss would increase the risk of summer water shortages and would hamper water distribution and hydropower generation. The diminished snowpack would also nearly eliminate all skiing and other snow-related recreation. Rising sea levels would push saltwater into California's estuaries, wetlands, and groundwater aquifers, threatening the water quality and reliability in the Sacramento/San Joaquin River Delta—a major California freshwater supply. Extreme precipitation and flooding could also damage water quality by creating sudden increases in runoff. Moreover, warming would increase evapotranspiration rates from plants, soil, and open water surfaces, which would result in greater demand for irrigation. Overall, climate change would reduce California's water supplies even as its growing population requires additional resources.
- **Sea Level and Flooding.** Sea level at California's coasts is expected to rise by 11 to 18 inches above 2000 levels by 2050 and by 23 to 55 inches by 2100. If realized, these increases would create more frequent and higher storm surges; would erode some coastal areas; and would increase pressure on existing levees. These increases would create a greater risk of flooding in previously untouched inland areas. Consequently, continued development in vulnerable coastal areas would put more people and infrastructure at risk.
- **Agriculture.** Although higher CO₂ levels can stimulate plant production and increase plant water-use efficiency, in the long-term, climate change would reduce the quantity and quality of agricultural products statewide. As temperatures rise, farmers will face greater water demand for crops and a less reliable water supply, as well as increased competition from urban water users. Sea level rise may cause saltwater intrusion in the Delta region, making it difficult to raise certain crops. Rising temperatures will likely aggravate O₃ pollution, interfering with plant growth and making plants more susceptible to disease and pests. In addition, warming would reduce the number of colder hours needed for fruit and nut production; would shift pest and weed ranges; would alter crop-pollinator timing; and would increase the frequency of droughts, heat waves, and floods. Higher average temperatures would also increase mortality and decrease productivity in livestock.

- **Forestry.** California timber production has declined over the past few decades due, in part, to warming and increased wildfires. While further warming may increase production for some species in some locations, climate change is expected to reduce overall forest growth. Increasing average temperatures and drought frequency would result in more wildfires and greater burned areas, while less frequent and more intense rainfall would increase soil erosion and landslides. Higher temperatures and less water would force many tree species to shift their ranges; those that run out of livable habitat may die out. Pests, diseases, and invasive species may also colonize new areas, further challenging forest health and biodiversity.
- **Ecosystems.** Rising average temperatures would subject plants and animals to greater thermal stress, causing some species to adapt or shift their ranges, while others may face extinction. Invasive species may also shift their ranges, threatening native species. Changing temperatures would also alter the timing of plant flowering and insect emergence, damaging species' ability to reproduce. Changing precipitation patterns would impact aquatic and riparian ecosystems by reducing snow pack, stream flow, and groundwater, while increasing the frequency of droughts, floods, and wildfires. As sea levels rise, some coastal habitats may be permanently flooded or eroded, and saltwater intrusion into freshwater resources may threaten terrestrial species. Changes in ocean circulation and temperature, ocean acidification, and increased runoff and sedimentation would threaten pelagic species. In sum, continued global warming would alter natural ecosystems and threaten California's biological diversity

Global, National, State, and Regional Contributions to GHG Emissions

Table 4.6-1 compares the magnitude of GHG emissions on the global, national, State, and regional (i.e., Los Angeles County) scales.

**TABLE 4.6-1
COMPARISON OF WORLDWIDE GHG EMISSIONS**

Area and Data Year	Annual GHG Emissions (MMTCO ₂ e)
World (2011)	45,451
United States (2013)	6,673
California (2012)	459
Los Angeles County, Unincorporated (2013)	5.6
MMTCO ₂ e: million metric tons of carbon dioxide equivalent	
Source: WRI 2012; USEPA 2015a; CARB 2014; LACDRP 2014a.	

The U.S. contributes approximately 14.7 percent of worldwide GHG emissions per year; California contributes approximately 1.0 percent; and the unincorporated portion of the County contributes approximately 0.01 percent. The most common GHG is CO₂, which constitutes approximately 84 to 85 percent of all GHG emissions in the U.S. and California. The primary contributors to California GHG emissions are (1) transportation; (2) electric power production from both in-state and out-of-state sources; and (3) industrial uses.

4.6.3 THRESHOLDS OF SIGNIFICANCE

Because the magnitude of global GHG emissions is extremely large when compared with the emissions of typical development projects, it is accepted as very unlikely that any individual development project would have GHG emissions of a magnitude to directly impact global climate change. CAPCOA's CEQA and Climate Change Report states, "GHG impacts are exclusively

cumulative impacts; there are no non-cumulative GHG emission impacts from a climate change perspective" (CAPCOA 2008). As noted by the CNRA, "Due to the global nature of GHG emissions and their potential effects, GHG emissions will typically be addressed in a cumulative impacts analysis" (CNRA 2009c). Therefore, the analysis presented in this section represents the cumulative impact analysis for the Project related to GHG emissions.

The following thresholds of significance are derived from the Environmental Checklist in Appendix G of the State CEQA Guidelines. A project would result in a significant adverse impact related to Greenhouse Gas if it would:

Threshold 4.6a Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment.

Threshold 4.6b Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases.

The AVAQMD's CEQA and Federal Conformity Guidelines include a "Significant Emissions Threshold" for GHG emissions of 100,000 tons (90,718 metric tons [MT]) per year. A project with emission rates below this value is considered to have a less than significant effect (AVAQMD 2011).

4.6.4 PROJECT DESIGN FEATURES

PDF GHG-1 Up to 1 megawatt (MW) of the Project's electricity demands will be offset through the County's existing 2-megawatt (MW) solar energy facility located immediately east of the Project site. The Contractor's Specifications will require that this County-owned renewable energy source will off-set the Project's electrical demands throughout construction as well as long-term operations.

PDF GHG-2 The Contractor's Specifications will require that the Project will provide a combined minimum of 34 video-visiting stations on-site, along with video interview rooms in transitional housing buildings.

PDF GHG-3 The Project will post Antelope Valley Transit Authority (AVTA) bus and Metrolink schedules, as well as the locations of the nearest Park-and-Ride lots, in areas visible to visitors and in the Staff Services building to encourage the use of public transportation by staff and visitors. AVTA bus and Metrolink schedule information will be updated not less than every six months to ensure that they are accurate.

PDF GHG-4 The Contractor's Specifications will require that the Project will incorporate (1) a secure storage area for staff to store bicycles into the Project design plans that allow for the individual locking of bicycles and protection from sun and inclement weather, and (2) bicycle rack(s) adjacent to the Visitor Parking Lot that allows for the individual locking of bicycles.

4.6.5 REGULATORY REQUIREMENTS

RR GHG-1 The Project will be designed and constructed in accordance with the Los Angeles County Code (Title 22, Section 22.52.2130), which requires all new buildings that are greater than 10,000 square feet (sf) and less than 25,000 sf in area will be designed and constructed to achieve the equivalency of a Leadership in Energy and Environmental Design (LEED™) certification; buildings of 25,000 sf or greater will achieve the equivalency of a LEED Silver certification. The Project will comply

with Title 22 (Section 22.52.2200 et seq., Drought Tolerant Landscaping; and Section 22.52.2100, Green Building).

- RR GHG-2** The Project will be designed and constructed in accordance with the California Code of Regulations, Title 24 Building Energy Efficiency Program, which establishes a minimum level of building energy efficiency and requires energy efficient measures, including ventilation, insulation, and construction and the use of energy-saving appliances, conditioning systems, water heating, and lighting.
- RR GHG-3** The Project will be designed and constructed in accordance with the Los Angeles County Code (Title 31, including but not limited to, Section 301.2.1 Low-rise Residential Buildings, and Section 301.3.1, Nonresidential Buildings greater than or equal to 25,000 square feet.), Section 4.106.5, Landscape Design, and Section 5.106.3, Low Impact Development or the current County code requirements in place at the time of Project design and construction. Title 31 requires project designs and practices that will result in the conservation of water and energy resources, such as measures for building commissioning, clean vehicle parking, and solid waste recycling.
- RR GHG-4** The Project will include an Employee Commute Reduction Plan (ECRP), commonly known as the Rideshare Plan, in accordance with Los Angeles County Code Chapter 5.9, Vehicle Trip Reduction. The ECRP will specify the measures to be implemented at MLWDC to achieve the target average vehicle ridership performance goal for employee vehicles subject to the Ordinance.
- RR GHG-5** The Project will be subject to the findings of the Advisory Board's evaluation of strategies to reduce negative impacts of operating the MLWDC away from the downtown Los Angeles area, including contract transportation for visitors, videoconferencing for attorney consultation, and reviewing national best practices for visiting and family reunification.

4.6.6 IMPACT ANALYSIS

Threshold 4.6a Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Long-term GHG emissions from energy sources, mobile sources (i.e., vehicles), and area sources and short-term emissions from construction equipment were calculated by using California Emissions Estimator Model (CalEEMod) Version 2013.2.2. CalEEMod is a computer program developed for all air districts in California that can be used to estimate GHG emissions associated with land development projects.

Specific inputs to CalEEMod for both construction and operation include land uses and acreages. Output operational emissions data include area sources, energy sources, mobile sources, waste generation, and water usage. The area sources include engine emissions from landscape maintenance equipment. Energy sources include natural gas and electricity usage. Mobile sources are the vehicles used by the detention center staff, visitors, and vendors. Mobile source emissions are based on trip generation forecasts for this Project; see Section 4.13, Transportation and Traffic and Appendix H of this EIR. Waste generation includes emissions from disposal of solid waste generated by the Project. Water usage emissions include the energy used to deliver potable water to the Project site and treat the wastewater subsequently generated.

Construction input data include, but are not limited to, the start and finish dates of Project construction phases; inventories of construction equipment to be used during each phase; the grading area; materials to be imported to and exported from the site; areas to be paved; and areas to be painted. It is noted that soil import and export are not anticipated for the Project. Additional details relative to the CalEEMod calculations may be found in Section 4.2, Air Quality, and in Appendix B of this EIR.

Because construction activity impacts are relatively short-term, they contribute a relatively small portion of the total lifetime GHG emissions of a project. In addition, GHG emission-reduction measures for construction equipment are relatively limited. Therefore, as originally proposed by the SCAQMD, it has become current practice (in most air districts) that construction emissions are amortized over a project lifetime (typically 30 years) so that GHG-reduction measures will address construction GHG emissions as part of the operational GHG reduction strategies (SCAQMD 2008; SMAQMD 2009). That method is used in this analysis.

Short-Term Construction Impacts

Construction activities would result in the temporary generation of GHGs through off-road and on-road construction equipment and worker vehicles. The Project is proposed for construction beginning in November 2016, with the facility in operation by the last quarter of 2019. The details of phasing, selection of construction equipment, and other input parameters are described in Section 4.2, Air Quality. The results of the CalEEMod calculations for GHGs from project construction are shown in Table 4.6-2. The construction of the Project would result in estimated GHG emissions of approximately 923 MTCO_{2e}, or annual GHG emissions of 31 MTCO_{2e} when amortized over 30 years.

**TABLE 4.6-2
ESTIMATED CONSTRUCTION ANNUAL GHG EMISSIONS**

Year	Emissions (MTCO_{2e})
2016	63
2017	306
2018	261
2019	293
Total	923
Annual Construction Emissions Amortized over 30 Years	31
MTCO _{2e} : metric tons of carbon dioxide equivalent	
Calculations in Appendix B	

Because construction emissions are amortized over a 30-year project lifetime, the level of significance for construction emissions related to the Project is included in the section on “Operational Activities”, and a separate significance finding for construction emissions is not necessary.

It should be noted that the Design-Build contractor may request an expedited schedule to work on Saturdays and/or to increase the intensity of the daily construction operations through the use of more equipment/workers on-site than anticipated in the Project’s proposed schedule (see Section 3.0, Project Description). This request would be considered for the purpose of reducing the duration of the Project construction period. The emissions modeling assumes a 5-day work week. If some or all construction would occur on a 6-day per week schedule and/or the schedule would be shortened by using more equipment, annual GHG emissions may increase for the years

affected. Because the total project effort would not change, there would be offsetting decreases later in the project and the total GHG emissions would be the same, or approximately the same as shown in Table 4.6-2. The amortized project emissions would not change.

Long-Term Operational Impacts

Operational GHG emissions for the Project were calculated in accordance with the methods described above. Mobile source input for trip generation was taken from the Project's Traffic Impact Study located in Appendix H of this EIR. As described in the Project Traffic Impact Study, it is anticipated that the relocation of inmates to the MLWDC would result in additional vehicle miles traveled (VMT) by visitors on weekends and holidays, inmate buses, and by service/delivery trucks seven days per week when compared to the Century Regional Detention Facility (CRDF) located in the City of Lynwood, which currently houses most female inmates. The worst-case estimate is an increase of 2,500 VMT on a weekday and 25,700 VMT on a weekend day or holiday. To account for the increased VMT, CalEEMod default trip distances were adjusted to add approximately 3.26 million annual VMT to the VMT generated with default trip distances.

Project-specific estimates for electricity, natural gas, water, and solid waste use were developed by the County for inputs to the calculations. The results of the calculations are shown in Table 4.6-3; CalEEMod data sheets are included in Appendix B of this EIR. The total operational GHG emissions at buildout of the Project are estimated at 5,614 MTCO₂e per year. Reductions in energy demand resulting from implementation of PDF GHG-1 and RR GHG-1 (LEED-equivalent design for the three new buildings with more than 10,000 sf of area) and RR GHG-3 were not included in the GHG emissions calculations because the reduction amounts could not be reasonably quantified. Similarly, reductions in VMT and mobile GHG emissions from implementation of PDF GHG-3 through PDF GHG-4 and RRs GHG-4 and GHG-5 cannot be reasonably quantified. Therefore, the GHG emissions estimates in Table 4.6-3 are conservatively high.

**TABLE 4.6-3
ESTIMATED OPERATIONAL ANNUAL GHG EMISSIONS**

Source	Emissions MTCO ₂ e/yr	Percent of Total
Area	5	0.1%
Energy	2,019	36.0%
Mobile	2,517	44.8%
Offroad	44	0.8%
Solid Waste	630	11.2%
Water	399	7.1%
Annual GHG Emissions	5,614	100%
MTCO ₂ e/yr: metric tons of carbon dioxide equivalent per year; GHG: greenhouse gas(es)		
Note: Totals may not add due to rounding.		

As described above, construction and operational GHG emissions are combined by amortizing the construction operations over a 30-year period. As shown in Table 4.6-4, with consideration of amortized construction emissions, the total annual estimated GHG emissions for the Project are 5,645 MTCO₂e/yr. This value is considerably less than the AVAQMD threshold of 90,718 MTCO₂e/yr. Therefore, the Project would result in less than significant GHG emissions and no mitigation is required. As previously discussed, the significance finding is cumulative, as the Project's GHG emissions alone would have no direct impact on the environment.

**TABLE 4.6-4
ESTIMATED TOTAL ANNUAL GHG EMISSIONS**

Source	Emissions MTCO ₂ e/yr
Construction (amortized) (from Table 4.6-2)	31
Operations (from Table 4.6-3)	5,614
Total	5,439
MTCO ₂ e/yr: metric tons of carbon dioxide equivalent per year	

Threshold 4.6b Would the project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Short-Term and Long-Term Impacts

The California Legislature adopted the public policy position that global warming is “a serious threat to the economic well-being, public health, natural resources, and the environment of California” (*California Health and Safety Code*, Section 38501). Further, the State Legislature has determined that:

The potential adverse impacts of global warming include the exacerbation of air quality problems, a reduction in the quality and supply of water to the state from the Sierra Nevada snowpack, a rise in sea levels resulting in the displacement of thousands of coastal businesses and residences, damage to marine ecosystems and the natural environment, and an increase in the incidences of infectious disease, asthma, and other human health-related problems.

These public policy statements became law with the enactment of AB 32 in September 2006. AB 32 is now codified as Sections 38500–38599 of the *California Health and Safety Code*. Thus, the principal State plan and policy adopted for the purpose of reducing GHG emissions is AB 32. The quantitative goal of AB 32 is to reduce statewide GHG emissions to 1990 levels by the year 2020. Statewide plans and regulations, such as GHG emissions standards for vehicles and the Low Carbon Fuel Standard, are being implemented, but compliance by individual projects is not addressed. Therefore, the Project would not conflict with these plans and regulations.

The regulations, plans, and policies adopted for the purpose of reducing GHG emissions and maximizing energy efficiency that are directly applicable to the Project include: (1) California’s Title 24, Part 6 Energy Efficiency Standards for Residential and Nonresidential Buildings; (2) California’s Title 24, Part 11 California Green Building Standards Code (CALGreen Code); (3) Title 22 of the County Code, Parts 20 (Green Building) and 21 (Drought-tolerant Landscaping); and (4) Title 31 of the County Code (Los Angeles County Green Building Standards Code). The Project would be consistent with the requirements of these energy-related regulations, as per RRs GHG-1, GHG-2, and GHG-3.

The Project would consist of two newly constructed transitional housing buildings, Building G and Building H, as shown on Exhibit 3-1. Per RR GHG-3, the construction of these buildings must comply with Title 31 of the Los Angeles County Code, specifically Section 301.2.1, Low-rise Residential Buildings. This section requires that newly constructed low-rise residential buildings shall comply with all applicable requirements of Chapter 4, Residential Mandatory Measures of CALGreen Code. Chapter 4 of CALGreen code requires design and development methods that include environmentally responsible site selection, building design, building siting, and

development to protect, restore, and enhance the environmental quality of the Project site and respect the integrity of adjacent properties.

RR GHG-3 also requires that the Project comply with Section 301.3.1 of Title 31 of the Los Angeles County Code. Section 301.3.1 requires that any newly constructed non-residential buildings greater than or equal to 25,000 square feet shall comply with Appendix A5 Non-residential Voluntary Measures of Title 31, which is also Section A5.601.2.4, Voluntary Nonresidential Voluntary Measures of the CALGreen Code. Examples of requirements in Appendix A5 include: designated parking requirements for fuel efficient vehicles; cool roofs; 30-percent reduction for indoor potable water use; recycled content of 10 percent of materials; 65-percent reduction in construction and demolition waste; resilient floor systems for 90 percent of resilient floor; and five elective measures. The requirements of Section 301.3.1 shall only apply to any building that exceeds the 25,000-square-foot minimum requirement for this ordinance, and not to the entire Project site.

Compliance with RR GHG-4, which requires development of a Project-specific ECRP, would be consistent with the goals and policies of SB 375 related to reducing emissions from mobile sources by reducing vehicle miles traveled. The ECRP could include measures such as financial incentives for carpool/ridesharing or use of public transit, use of fleet vehicles for ridesharing, or use of a computerized rideshare matching service, among other options.

Furthermore, the Project is anticipated to achieve additional GHG emissions reduction with incorporation of PDF GHG-1 through PDF GHG-4. PDF GHG-1 accounts for the off-set of up to 1 MW of the Project's electrical demand through the existing 2 MW solar facility on the County-owned property adjacent to the Project site. PDF GHG-2 requires a combined minimum of 34 video-visiting stations at the Project site along with video interview rooms in transitional housing buildings. This is anticipated to reduce VMT associated with vehicle travel to the MLWDC by inmate visitors. PDF GHG-3 requires that the Project post AVTA bus transit and Metrolink schedules to encourage the use of public transportation to and from the Project site. Additionally, the County Board of Supervisors directed the establishment of an Advisory Board that will consist of County staff, outside experts, and others including previously incarcerated participants to review the program model for the MLWDC Project to ensure that it is evidence based in reducing recidivism. As part of its charge and per RR GHG-5, the Advisory Board is tasked with further evaluating strategies to reduce negative impacts of operating the MLWDC away from the downtown Los Angeles area, including contract transportation for visitors, videoconferencing for attorney consultation as well as reviewing national best practices for visiting and family reunification. PDF GHG-4 would provide secure on-site bicycle storage for both staff commuting and visitors.

Additionally, as set forth in RR UTIL-2 from Section 4.14, Utilities and Service Systems, all construction and demolition activities on the Project site must be conducted in compliance with the County's Green Building Standards Code and Construction and Demolition Debris Recycling and Reuse Ordinance, which requires a minimum of 65 percent of the "non-hazardous construction and demolition debris by weight" to be recycled or reused unless a lower percentage is approved by the Director of Public Works

As demonstrated above, the Project would be consistent with and would not conflict with regulations and policies adopted for the purpose of reducing GHG emissions. There would be no impact; no mitigation is required.

4.6.7 CUMULATIVE IMPACTS

As discussed above, the assessment of GHG emissions is inherently cumulative because climate change is a global phenomenon. The cumulative impact of the Project's GHG emissions on climate change is less than significant, as described in Section 4.6.6.

4.6.8 MITIGATION MEASURES

No significant impacts from GHG emissions have been identified; therefore, no mitigation is required.

4.6.9 LEVEL OF SIGNIFICANCE AFTER MITIGATION

Incorporation of PDFs GHG-1 through GHG-4 and compliance with RRs GHG-1 through GHG-5 would ensure that there would be a less than significant impact related to the total annual GHG emissions of the Project. There would be no impact related to conflict with regulations and policies adopted to reduce GHG emissions.

4.6.10 REFERENCES

Antelope Valley Air Quality Management District (AVAQMD). 2015 (accessed February 6). Mission Statement. Lancaster, CA: AVAQMD. <http://www.avaqmd.ca.gov/index.aspx?page=407>.

———. 2011 (August). *Antelope Valley AQMD California Environmental Quality Act (CEQA) and Federal Conformity Guidelines*. Lancaster, CA: AVAQMD. <http://www.avaqmd.ca.gov/Modules/ShowDocument.aspx?documentid=2911>.

California Air Pollution Control Officers Association (CAPCOA). 2010 (August). *Quantifying Greenhouse Gas Mitigation Measures: A Resource for Local Government to Assess Emission Reductions from Greenhouse Gas Mitigation Measures*. Sacramento, CA: CAPCOA. <http://www.capcoa.org/wp-content/uploads/2010/11/CAPCOA-Quantification-Report-9-14-Final.pdf>.

———. 2008 (January). *CEQA & Climate Change: Evaluating and Addressing Greenhouse Gas Emissions from Projects Subject to the California Environmental Quality Act*. Sacramento, CA: CAPCOA. <http://www.capcoa.org/wp-content/uploads/downloads/2010/05/CAPCOA-White-Paper.pdf>.

California Air Resources Board (CARB). 2014 (March 24, last updated). California Greenhouse Gas Inventory for 2000–2012 — by Category, as Defined in the 2008 Scoping Plan. Sacramento, CA: CARB. http://www.arb.ca.gov/cc/inventory/data/tables/ghg_inventory_scopingplan_00-12_2014-03-24.pdf.

———. 2009 (August 7). *Staff Report: Initial Statement of Reasons for Rulemaking, Notice of Public Hearing to Consider Proposed Amendments to New Passenger Motor Vehicle Greenhouse Gas Emission Standards*. Sacramento, CA: CARB. <http://www.arb.ca.gov/regact/2009/ghgpv09/ghgpvisor.pdf>.

———. 2008 (December). *Climate Change Scoping Plan: a Framework for Change*. Sacramento, CA: CARB. http://www.arb.ca.gov/cc/scopingplan/document/adopted_scoping_plan.pdf.

California Building Standards Commission (CBSC). 2015 (accessed February 6). *Adopted 2013 Code, Triennial California Building Standards Commission (CBSC). Adopted 2013 Code, Triennial Edition*. Sacramento, CA: CBSC. <http://www.bsc.ca.gov/>.

California Environmental Protection Agency (CalEPA). 2010 (December). *Climate Action Team Report to Governor Schwarzenegger and the California Legislature*. Sacramento, CA: CalEPA. <http://www.energy.ca.gov/2010publications/CAT-1000-2010-005/CAT-1000-2010-005.PDF>.

California Natural Resources Agency (CNRA). 2009a (December 30). *Adopted Text of SB97 CEQA Guidelines Amendments*. Sacramento CA: CNRA. http://resources.ca.gov/ceqa/docs/Adopted_and_Transmitted_Text_of_SB97_CEQA_Guidelines_Amendments.pdf.

———. 2009b. *2009 California Climate Adaptation Strategy*. Sacramento CA: CNRA. http://resources.ca.gov/docs/climate/Statewide_Adaptation_Strategy.pdf.

———. 2009c (December). *Final Statement of Reasons for Regulatory Action, Amendments to the State CEQA Guidelines Addressing Analysis and Mitigation of Greenhouse Gas Emissions Pursuant to SB97*. Sacramento CA: CNRA. http://resources.ca.gov/ceqa/docs/Final_Statement_of_Reasons.pdf.

California Office of Governor Edmund G. Brown Jr. (COOG). 2015 (April 29). *Top Story - Governor Brown Establishes Most Ambitious Greenhouse Gas Reduction Target in North America*. Sacramento CA: COOG.

Los Angeles, County of. 2015 (last update). *Los Angeles County, California – Code of Ordinances*. Tallahassee, FL: Municode Corporation for the County. <https://library.municode.com/index.aspx?clientId=16274>.

Los Angeles, County of. Department of Regional Planning (LACDRP). 2015a (February 17, last accessed). *Los Angeles County General Plan 2035, Regional Planning Commission-Discussions*. Los Angeles, CA: DRP. <http://planning.lacounty.gov/generalplan/meetings>.

———. 2015b (February 12, last accessed). *Tree Planting Ordinance*. Los Angeles, CA: DRP. <http://planning.lacounty.gov/tree>.

———. 2014a. *Los Angeles County General Plan, Public Review Draft*. Los Angeles, CA: LACDRP. <http://planning.lacounty.gov/generalplan/draft2014>.

———. 2014b (July). *Unincorporated Los Angeles County Community Climate Action Plan 2020. Final*. Los Angeles, CA: LACDRP.

———. 2014c (December 17). *Draft Resolution of the Regional Planning Commission, County of Los Angeles Tree Planting Ordinance*. Los Angeles, CA: LACDRP.

———. 2014d (November 3, last updated). *Draft Antelope Valley Area Plan, Town & Country*. Los Angeles, CA: LACDRP. <http://planning.lacounty.gov/tnc/documents/>.

Los Angeles County Internal Services Department (ISD). 2015 (June 30). *Letter to the Board of Supervisors. Approval of Revised Board Policy Number 3.045-Countywide Environmental Sustainability (All Districts-3 Votes)*. Los Angeles, CA: LASD.

- National Aeronautics and Space Administration (NASA). 2015 (January 16, Posted). NASA, NOAA Find 2014 Warmest Year in Modern Record. New York, NY: NASA, the Goddard Institute for Space Studies. <http://www.giss.nasa.gov/research/news/20150116/>.
- South Coast Air Quality Management District (SCAQMD). 2008 (October). *Draft Guidance Document – Interim CEQA Greenhouse Gas (GHG) Significance Thresholds*. Diamond Bar, CA: SCAQMD.
- Sacramento Metropolitan Air Quality Management District (SMAQMD). 2009 (as revised through November 2014). *Guide to Air Quality Assessment in Sacramento County*. Sacramento, CA: SMAQMD. <http://www.airquality.org/ceqa/ceqaguideupdate.shtml>.
- Southern California Association of Governments (SCAG). 2012 (April). *Regional Transportation Plan/Sustainable Communities Strategy 2012–2035, Final Plan*. Los Angeles, CA: SCAG. <http://rtpscs.scag.ca.gov/Pages/2012-2035-RTP-SCS.aspx>.
- U.S. Department of Commerce, National Oceanic and Atmospheric Administration, Earth System Research Laboratory, Global Monitoring Division (ESRL) 2015 (May 5, last updated). Trends in Atmospheric Carbon Dioxide. Boulder, CO: ESRL. <http://www.esrl.noaa.gov/gmd/ccgg/trends/>.
- U.S. Environmental Protection Agency (USEPA). 2015a (April 15). Inventory of U.S. Greenhouse Gas Emissions and Sinks: 1990–2013. Washington, D.C.: USEPA. <http://www.epa.gov/climatechange/Downloads/ghgemissions/US-GHG-Inventory-2015-Main-Text.pdf>.
- . 2015b (April 27, last accessed). Glossary: Terms and Acronyms. Washington, D.C.: USEPA. <http://www.epa.gov/oms/imports/glossary.htm#ldv>.
- . 2010a (October 26, last updated). Endangerment and Cause or Contribute Findings for Greenhouse Gases under Section 202(a) of the Clean Air Act. Washington, D.C.: USEPA. <http://www.epa.gov/climatechange/endangerment/>.
- . 2010b (April). *Regulatory Announcement: EPA and NHTSA Finalize Historic National Program to Reduce Greenhouse Gases and Improve Fuel Economy for Cars and Trucks*. Washington, D.C.: USEPA. <http://www.epa.gov/otaq/climate/regulations/420f10014.pdf>.
- U.S. Environmental Protection Agency and U.S. Department of Transportation, National Highway Traffic Safety Administration (USEPA and NHTSA). 2012 (October 15). 2017 and Later Model Year Light-Duty Vehicle Greenhouse Gas Emissions and Corporate Average Fuel Economy Standards. *Federal Register* (Volume 77, No. 199, pp. 62623–63200). Washington, D.C.: USEPA and NHTSA.
- World Resources Institute (WRI). 2012. Climate Analysis Indicators Tool (CAIT) version 9.0. Washington, D.C.: WRI. <http://cait.wri.org/>.

4.7 HAZARDS AND HAZARDOUS MATERIALS

This section identifies existing health and safety hazards (including the use of hazardous materials and the generation of hazardous wastes) that may affect the Project, as well as hazards that may be created by the Project. The information in this section is derived from the following technical reports:

- Phase I Environmental Site Assessment Report (ESA) by Converse Consultants (May 2014)
- Limited Asbestos and Lead-based Paint Survey Report by Converse Consultants (January 2013)
- Limited Asbestos and Lead Sampling Report, Building/Barrack 7 by Converse Consultants (June 2014)
- Asbestos & Lead-based Paint Survey Report by Converse Consultants (September 2014)
- Phase II ESA by Converse Consultants (March 2015)

The Phase I ESA was prepared in accordance with the scope and limitations of the American Society for Testing and Materials (ASTM) E 1527-13 Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process and the U.S. Environmental Protection Agency's (USEPA's) Standards and Practices for All Appropriate Inquiries (40 *Code of Federal Regulations* [CFR] Part 312). The Phase II ESA was performed in general conformance with the ASTM Standard E1903-11 Standard Practice for Environmental Site Assessments: Phase II Environmental Site Assessment Process.

4.7.1 RELEVANT PROGRAMS AND REGULATIONS

Federal

Toxic Substances Control Act

The Toxic Substances Control Act (TSCA) of 1976 (15 *United States Code* [USC] 2601) gives the U.S. Environmental Protection Agency (USEPA) the ability to track 75,000 industrial chemicals currently produced or imported into the United States. The USEPA repeatedly screens these chemicals and requires reporting or testing of those that may pose an environmental or human health hazard. The USEPA also has the ability to ban the manufacture and import of chemicals that pose an unreasonable risk. The USEPA tracks thousands of new chemicals that are developed each year with either unknown or dangerous characteristics. The production, importation, use, and disposal of these toxic substances is regulated by the USEPA, as necessary, to protect human health and the environment.

Accidental Release Prevention Program

Title 40, Part 68 of the *Code of Federal Regulations* (CFR) is the federal Accidental Release Prevention Program that lists regulated toxic and flammable substances and sets requirements concerning the prevention of accidental releases. It sets threshold quantities of regulated substances at which owners or operators of a stationary source are required to prepare risk management plans. These risk management plans must contain an assessment of the risks for accidental release, prevention measures, emergency response procedures, employee training, record keeping, and incident investigations.

Resource Conservation and Recovery Act

The Resource Conservation and Recovery Act (RCRA) serves as the basis for the proper management of hazardous and nonhazardous solid wastes. The RCRA amended the Solid Waste Disposal Act of 1965 and is implemented through the following programs:

- The Solid Waste Program encourages States to develop comprehensive plans to manage non-hazardous industrial solid wastes and municipal solid wastes; sets criteria for municipal solid waste landfills and other solid waste disposal facilities; and prohibits the open dumping of solid wastes.
- The Hazardous Waste Program establishes a system for controlling hazardous waste from the time it is generated until its ultimate disposal (in effect from “cradle to grave”).
- The Underground Storage Tank Program regulates underground storage tanks (USTs) containing hazardous substances and petroleum products.

In November 1984, the RCRA was amended with the passing of the Federal Hazardous and Solid Waste Amendments (HSWAs) to phase out the land disposal of hazardous wastes; to increase the enforcement authority of the USEPA; to set more stringent hazardous waste management standards; and to develop a comprehensive UST program. The RCRA has been further amended by the Federal Facility Compliance Act of 1992 (which strengthened the enforcement of RCRA at federal facilities) and the Land Disposal Program Flexibility Act of 1996 (which provided regulatory flexibility for land disposal of certain wastes).

Hazardous Materials Transportation Regulations

The Hazardous Materials Transportation Act and Hazardous Materials Transportation Uniform Safety Act provide regulatory and enforcement authority to the Secretary of Transportation to reduce risks to life and property from hazards associated with the transport of hazardous materials. These Acts promote uniformity among different state and local highway routing regulations, to develop criteria for the issuance of federal permits to motor carriers of hazardous materials, and to regulate the transport of radioactive materials. The CFR (Title 49, Parts 172, 173, 177, and 397) contains the rules for labeling, packing, shipping, and transporting hazardous materials.

Federal Aviation Regulations

The CFR (Title 15, Part 77) contains the regulations governing objects that may affect navigable airspace. The regulations include standards for determining obstructions to air navigation; noticing requirements that will allow the Federal Aviation Administration (FAA) to determine if objects have the potential to affect navigable airspace; the need for aeronautical studies and determinations; discretionary review; and standard instrument approach procedures, take-off minimums, and obstacle departure procedures. These regulations apply to public and private use airports, heliports, military airports, joint-use (civil-military) airports, and seaplane bases.

State

California Accidental Release Prevention Program

The California Accidental Release Prevention Program (CalARP) merged the Federal Accidental Release Prevention Program and California Risk Management and Prevention Program to eliminate the need for two separate programs addressing the prevention of accidental releases of regulated toxic and flammable substances. Businesses using regulated substances exceeding

a threshold quantity are evaluated under this program to determine the potential for and impacts of accidental releases. Depending on the potential hazards, business owners may be required to develop and submit a risk management plan.

California Hazardous Waste Control Act

The California Hazardous Waste Control Act (HWCA), as contained in Section 25100 et seq. of the *California Health and Safety Code*, authorizes the California Department of Toxic Substances Control (DTSC) and the Certified Unified Program Agencies (CUPA) to regulate facilities that generate or treat hazardous wastes. The HWCA authorizes CUPAs to perform the following actions:

- Conduct inspections of any factory, plant, construction site, waste disposal site, transfer station, establishment, or any other place or environment where hazardous wastes are stored, handled, processed, disposed of, or being treated to recover resources.
- Maintain records for compliance with the HWCA.
- Require hazardous waste generators to pay inspection and administration fees to cover the costs of administering the provisions in the HWCA. Fees may include but shall not be limited to the costs of inspection, document development and processing, record keeping, enforcement activities, and informational materials development and distribution.
- Issue authorization for on-site treatment of hazardous wastes to persons that are eligible to operate pursuant to permit-by-rule, conditional authorization, or conditional exemption.
- Enforce against violations of the HWCA.

California Underground Storage Tank Regulations

The California Underground Storage Tank Regulations (Title 23, Chapter 16 of the *California Code of Regulations*) includes guidelines and standards to protect waters from hazardous substance discharges from USTs. The regulations establish construction requirements for new USTs; establish separate monitoring requirements for new and existing USTs; establish uniform requirements for unauthorized release reporting and for repair, upgrade, and closure of USTs; and specify variance request procedures. It requires responsible parties to remediate any unauthorized releases from USTs.

Certified Unified Program

In 1993, Senate Bill (SB) 1082 set up a program to foster effective partnerships between local, State, and federal agencies through designated CUPAs. The Certified Unified Program consolidated the administrative, permitting, inspection, and enforcement activities of the following environmental and emergency management programs:

- Hazardous Materials Release Response Plans and Inventories (Business Plans)
- CalARP
- UST Program
- Aboveground Petroleum Storage Act Program
- Hazardous Waste Generator and On-Site Hazardous Waste Treatment Programs
- California Uniform Fire Code's Hazardous Material Management Plans and Hazardous Material Inventory Statements.

The Certified Unified Program is implemented at the local level by government agencies certified by the Secretary of the California Environmental Protection Agency (CalEPA). The CUPA for the City of Lancaster is the Los Angeles County Fire Department.

Underground Utility Lines

The *California Code of Regulations* (Title 8; Section 1541, General Requirements) requires excavators to identify subsurface installations prior to opening an excavation and to ensure that the underground lines are marked. The excavators must receive a positive response from all known owners/operators of subsurface installations and lines; additionally, before starting the excavation, excavators must meet with owners/operators of high priority¹ subsurface installations that are located within ten feet of the proposed excavation. Only qualified persons (those meeting training and competency requirements) can perform subsurface installation locating activities. Excavators must be trained in notification and excavation activities (i.e., excavators must immediately notify the subsurface installation owner/operator of any damage discovered during or caused by excavating activities).

Sections 4216–4216.9 of the *California Government Code* require every owner/operator of a subsurface installation, except the Department of Transportation, to become a member of, participate in, and share in the costs of, a regional notification center. If the excavation will be conducted in an area that is known or that reasonably could contain subsurface installations other than the underground facilities owned or operated by the excavator, the appropriate regional notification center must be contacted by the excavator at least 2 working days but not more than 14 calendar days prior to the start of excavation. The responsibilities of the excavator and regional notification center are in place to prevent undue hazards from accidental damage to underground utility lines and are outlined in the regulations.

Hazardous Materials Transportation License

Sections 31301 through 34510 of the *California Vehicle Code* contain the general requirements regarding the transportation of hazardous materials and wastes. The requirements include route designation; licensing, records, and inspections; design, construction, and maintenance of cargo trucks; amount and types of cargo and their marking, packing, and labeling; advanced notification of routes and stops; and other provisions. Based on the amount of hazardous material and the size of the truck, the California Highway Patrol may require a Hazardous Materials Transportation License; hazard warning placards; and inspections for compliance with pertinent regulations.

Lead Abatement

Lead is regulated as a hazardous material and inorganic lead is regulated as a toxic air contaminant (TAC). The California Division of Occupational Safety and Health (also known as the California Occupational Safety and Health Administration [CalOSHA]) has adopted regulations to protect worker safety during potential exposure to lead, as contained in the *California Code of Regulations* (Title 8; Section 1532.1, Lead). All demolition that could result in the release of lead must be conducted according to set standards, which protect the general population and construction workers from respiratory and other health hazards associated with lead exposure. Also, lead abatement must be performed and monitored by contractors with appropriate certifications from the California Department of Health Services (DHS).

¹ Examples of “high priority” subsurface installations include high pressure pipelines, natural gas/petroleum pipelines, and electrical lines greater than 60,000 volts.

Asbestos Abatement

Asbestos is a known human carcinogen, and the USEPA and CalEPA have identified asbestos as a hazardous air pollutant pursuant to Section 12 of the Federal Clean Air Act. The California Air Resources Board (CARB) has also identified asbestos as a TAC pursuant to the *California Health and Safety Code* (Section 39650 et seq.). Asbestos is regulated as a potential worker safety hazard under the authority of CalOSHA. Existing regulations prohibit emissions of asbestos from demolition or construction activities; require medical examinations and monitoring of employees engaged in activities that could disturb asbestos; specify precautions and safe work practices that must be followed to minimize the potential for release of asbestos fibers; and require notice to federal and local government agencies prior to beginning renovation or demolition that could disturb asbestos.

CalOSHA regulations to protect worker safety during potential exposure to asbestos are contained in the *California Code of Regulations* (Title 8; Section 1529, Asbestos). All demolition that could result in the release of asbestos must be conducted in accordance with CalOSHA standards. These standards protect the general population and construction workers from respiratory and other health hazards associated with exposure to asbestos. Also, asbestos abatement must be performed and monitored by contractors with appropriate certifications from the California DHS.

Regional

Asbestos Removal

The Antelope Valley Air Quality Management District's (AVAQMD's) Rule 1403 provides guidelines for the proper removal and disposal of asbestos-containing materials. In accordance with Rule 1403, structures that may contain asbestos must be surveyed by a Certified Asbestos Consultant (certified by CalOSHA) to identify building materials that contain asbestos prior to its disturbance. Under this rule, the removal of asbestos must include AVAQMD notification; compliance with removal procedures and time schedules; asbestos-handling and clean-up procedures; and storage, disposal, and landfilling requirements.

Toxic and Hazardous Air Pollutant Emissions

AVAQMD Regulations X and XIV address toxic and hazardous air pollutant emissions. Regulation X adopts the National Emission Standards for Hazardous Air Pollutants (NESHAPS) as part of the AVAQMD rules, as they relate to the emissions of benzene, radon, beryllium, mercury, vinyl chloride, asbestos, radionuclide emissions, and inorganic arsenic from any stationary source. Regulation XIV specifies the limits for maximum individual cancer risk (MICR), cancer burden, and non-cancer acute and chronic hazard index (HI) from new, modified, or relocated stationary sources that emit toxic air contaminants. The rule includes regulations for various toxic air contaminants, including asbestos, hexavalent chromium, dioxin, ethylene oxide, chlorofluorocarbon, halon, lead, and other toxics.

County

Los Angeles County as a Certified Unified Program Agency

In 1997, the Health Hazardous Materials Division (HHMD) of the Los Angeles County Fire Department became a CUPA and has since been responsible for implementing various hazardous material management programs in the County, except in the cities of El Segundo,

Glendale, Long Beach, Los Angeles, Santa Fe Springs, Santa Monica, and Vernon. The Los Angeles County Fire Department implements the programs discussed below.

Hazardous Waste Generator Program. Generators of hazardous wastes (i.e., waste oil, waste coolant, waste parts cleaner, waste photo developer, waste printing inks, waste dry cleaning solvent, waste paint, and spray booth filters) are required to submit a Hazardous Waste Generator Form to the HHMD to determine the necessary permit for the facility. The HHMD inspects, enforces, and permits hazardous material handlers and hazardous waste generating businesses to ensure compliance with federal, State, and local laws and regulations.

Hazardous Materials Release Response Plans and Inventory Program. Hazardous waste generators are required to provide the HHMD with a hazardous materials inventory and contingency plan if the business handles or stores hazardous materials equal to or above the following quantities:

- 55 gallons for liquids
- 500 pounds for solids
- 200 cubic feet for gases
- Quantities of radioactive materials for which an emergency plan is required under federal regulations
- Regulated Substances (RS), which must be reported if the listed Threshold Quantity (TQ) is exceeded

All hazardous material handlers are required to develop and implement an employee training program.

California Accidental Release Prevention Program. As discussed above, this program requires businesses to minimize the possibility of an accidental release by implementing engineering and administrative controls. Owners or operators are required to develop and implement an accident prevention program. Subsequently, the owner or operator may be required to develop and submit a risk management plan (RMP) to the HHMD for review and compliance with applicable State and federal requirements.

Aboveground Storage Tank and Underground Storage Tank Programs. Operators of aboveground storage tanks (ASTs) containing over 1,320 gallons of petroleum products must prepare and annually submit a Spill Prevention Control and Countermeasure (SPCC) Plan and a Business Plan to the HHMD. The owner or operator must conduct periodic inspections of the facility to determine if their SPCC is being implemented and must immediately report the release of 42 gallons or more of petroleum. The HHMD inspects the facilities for compliance with SPCC plans and federal, State, and local laws and regulations.

Permits and fees are required for the operation, installation, modification, and removal of a UST. Modifications include changes to the primary and/or secondary containment, piping, under dispenser containment, fill and/or piping sumps, overflow protection, and system monitors. Removal of piping and/or dispensers also requires a closure report. Unauthorized releases that increase the hazard of a fire or deterioration to the tank system must be reported to the HHMD.

Los Angeles County Code

Title 11, Health and Safety, of the Los Angeles County Code addresses the underground storage and unauthorized discharges of hazardous materials, among others. The County requires that

persons in charge of a facility be responsible for the containment and clean up of any unauthorized discharge of a hazardous material.

General William J. Fox Airfield Land Use Compatibility Plan

The Los Angeles County Airport Land Use Commission (ALUC) adopted the General William J. Fox Airfield Land Use Compatibility Plan, which sets policies for development near the Fox Airfield to ensure that future land uses in the surrounding area are compatible with airport operations. The ALUC uses this plan in evaluating development proposals based on the proposed land use, intensity and/or density of the use, distance to the airport and designated runway protection zones, approach/departure zones, aircraft patterns and other airport environs, height and structures, potential noise exposure, and other safety issues.

City

Lancaster Hazard Mitigation Plan

The Lancaster Hazard Mitigation Plan (HMP) provides information to residents, organizations, agencies, and other interested individuals of the hazards in the City (i.e., windstorms, earthquakes, fires, flooding, landslides, and terrorism) and sets goals and strategies to reduce risk and prevent losses from these hazards. The HMP was developed to protect life, property and the environment from natural and human hazards; to increase public awareness; to strengthen partnerships with various agencies; and to improve emergency management.

Lancaster Emergency Operations Plan

The Lancaster Emergency Operations Plan was developed to improve emergency preparedness, response, and recovery in the City of Lancaster during large-scale disasters. It outlines the responsibilities of various City departments and agencies to coordinate all the facilities and personnel of the City when responding to any emergency associated with a natural disaster or technological incidents. The Plan's main purposes are to prevent death and destruction and to minimize property losses. It calls for public awareness; the training of City personnel assigned in incident management; warning systems; an established emergency organization; pre-emergency and emergency response responsibilities; coordination of assistance programs and support priorities as part of the recovery period; and implementation of post-disaster mitigation. The Plan is intended to guide the City's emergency operations during a major earthquake, a hazardous materials incident, a flood, a fire, dam failure, a major air crash, a railway or trucking incident, civil unrest, terrorism, a landslide, or other public health emergency (e.g., pandemic or heat emergency).

4.7.2 EXISTING CONDITIONS

Past Land Uses

The Mira Loma Detention Center (MLDC) property, which includes the Project site was undeveloped until the 1940s when a pilot training facility (Polaris Flight Academy – War Eagle Field) was built in 1941. The academy closed in 1945, but the barracks, hangars, living quarters, and swimming pool of the academy remain at the southeastern corner of West Avenue I and 60th Street West.

By 1945–1946, the site began to be used as a California Youth Authority facility run by the State Department of Corrections. The California Youth Authority ran a vocational school that focused on job training for juvenile offenders until 1953–1954, when it became known as the State Juvenile

Jail at Mira Loma. Los Angeles County transferred approximately 400 medium security prisoners to the Mira Loma facility, resulting in the relocation of the State's juvenile prisoners. Approximately 320 acres of the site remained in use as a flight field administered by the State and later by the County.

In 1957, the prison facilities on the site were expanded. Two new prison barracks (Buildings E and F), were constructed to modernize the facilities and to replace buildings from the original flight school. Then, the Mira Loma facility ceased operations for the first time in 1979. It reopened in 1983 and was expanded with the construction of several new buildings in 1986. Many of the buildings within the Project site boundaries were developed in 1986 and later as part of this expansion. The facility became a female prison and was known as the Mira Loma Female Honor Ranch, but was closed again 1993.

The MLDC was used by the U.S. Immigration and Customs Enforcement (ICE) to house alien detainees starting in 1997. In the 2000s, modular structures (i.e., courtrooms, a medical dispensary, and support offices) and new guard towers were added to the site. Since the end of the contract between ICE and the County Sheriff's Department in 2012, the detention center has remained largely unoccupied.

During its operation, the MLDC was listed in several government databases for the use of hazardous materials and the generation of hazardous wastes. It was listed as an industrial waste generator and UST site. Records indicate that six older USTs at the MLDC were removed in 1999 and contamination was found in the soils. The soil contamination was remediated and the case was closed in 2003. Five new USTs were installed at the MLDC in 1998. Four USTs were upgraded in 2005 and one UST was removed in 2006. The Los Angeles County Department of Public Works (LACDPW) issued a "Closure Certification" letter to the property on May 22, 2008, and determined that "no further action is required".

Project Site

The southern and eastern sections of the larger MLDC property are included in the 46-acre Project site, with older structures that were part of the Polaris Flight Academy at the northwestern section generally not part of the Project site. For reference, Exhibit 2-3 in Section 2.0, Environmental Setting, depicts the existing MLDC buildings with an overlay of the Project site boundary.

Current Land Uses

The existing buildings on the site include single-story steel-framed buildings with metal sidings and concrete masonry buildings. Permanent buildings are slab-on-grade, with plaster, metal or masonry walls; plaster, drywall, or suspended ceiling panels; and concrete, ceramic tile, vinyl floor tiles, or carpeted floors. Modular structures are on raised floors.

Aboveground Storage Tanks and Underground Storage Tanks

As part of the Phase I ESA, site visits in April and May 2014 identified the presence of various hazardous materials in the buildings. These included insecticide, paint, paint thinner, motor oil, cleansers, gasoline, grease, sealant, degreaser, disinfectant, coolant, and other substances. Biohazard waste drums, used oil drum, gasoline containers, nitrous oxide and oxygen cylinders, AST, USTs, hydraulic hoists, and transformers were found outdoors. No leaks were observed, except for minor staining on the carpet and hydraulic oil on the concrete floors beneath the emergency generator in the central plant (i.e., steam plant).

There are four USTs and one AST at the MLDC, with two USTs and one AST within the Project site. One UST was used for the emergency generator at the central plant; one UST was used for the emergency generator at the Administration Building 3 (War Eagle Gym); and the AST was used for the heliport. In June 2013, the facility was cited by the Los Angeles County Fire Department (LACFD) because the generator and USTs did not have current permits. The LACFD also required a Hazardous Materials Business Plan and the disposal of hazardous wastes from the facility. The UST at the central plant also failed leak detection tests (i.e., leak detention systems did not function properly) in 2013.

Asbestos and Lead-Based Paint

A survey of the existing buildings indicates that asbestos-containing materials (ACMs), asbestos-containing construction materials (ACCMs), and lead based paint are present in various buildings at the MLDC. Transit vent pipes, heating, ventilation, and air conditioning (HVAC) unit duct joint compound, pipe elbows and insulation, and condensate tank and pipe insulation and elbows were also assumed to contain asbestos. Table 4.7-1 lists the buildings and building materials that have been determined to contain asbestos and lead-based paint at concentrations that would be considered as hazardous materials.

**TABLE 4.7-1
ASBESTOS AND LEAD SAMPLING**

Building Number and Name	Building Materials with Asbestos	Building Materials with Lead-Based Paint
Building 1: Administration	Roof mastic	Wall ceramic tile, sinks
Building 2: Main Control	Roof mastic, black floor tile mastic	Wall ceramic tile
Building 3: Infirmary/Processing	Roof mastic	Wall ceramic tile, floor ceramic tile, toilet
Building 4: Inmate Services	Roof mastic	Wall ceramic tile
Building 5: Warehouse/Laundry	Roof mastic	Wall ceramic tile
Building 6: Utility Shop	Roof mastic, roof core (rolled roofing material)	Wall ceramic tile
Buildings 7–15: Low Side Barracks	Roof mastic, plaster, and skim coat	Wall ceramic tile, floor ceramic tile, large sink
Buildings 16–22: High Side Barracks	Roof mastic, plaster and skim coat	Wall ceramic tile, large sink, toilets
Building 23: Adjustment Center	Roof mastic	–
Building 24: Recreation Room	Roof mastic	Wall ceramic tile
Building 25: ICE Administration	–	–
Building 27: Immigration Courts	Modular building not sampled	Modular building not sampled
Building 28: Scheduling/Training	Modular building not sampled	Modular building not sampled
Building 29: Kitchen Armory	Modular building not sampled	Modular building not sampled
Building 30: Steam Plant	Drywall (plaster), joint compound and skim coat on ceiling, roof mastic, window putty, pipe insulation, asbestos cement wall panels, roofing material, grey rolled roofing, parapet core, mid-roof	Interior metal window frames, interior structural steel beams and columns, interior metal stairway and supports, interior metal catwalk, exterior metal window frames, exterior metal walls, wall ceramic tile, janitor sinks
Utility Tunnel	Pipe run, elbow, gasket and insulation	Pipe run supports

**TABLE 4.7-1
ASBESTOS AND LEAD SAMPLING**

Building Number and Name	Building Materials with Asbestos	Building Materials with Lead-Based Paint
Building 31: Old Side Canteen*	–	–
Building 36: Jaffey Park Booth	–	–
Buildings 3614–3621: Outside Maintenance and Storage*	Floor tile and mastic, baseboard mastic and baseboard, flooring mastic, ceiling tile mastic, vent pipe	Exterior wood beams and columns, wood door frames and doors, window components, wood door steps, exterior wood fasciae, interior plaster walls, sink
Buildings 3626, 3627, 3628, 3629: Able, Baker, Charlie, and Dog Barracks*	Roof mastic, drywall and joint compound, HVAC duct joint compound, pipe elbows, vent pipe	Interior wood ceiling beams and columns, window components, exterior wood columns, exterior wood door, ceramic sink, wall ceramic tile, sinks, wood arcade posts
Building 3630: FSB Building	Roof mastic, window putty, tar composite roof, plaster wells/ceilings with skim coat, tank insulation, pipe insulation and elbows, roof core	Interior wood sliding door, interior structural steel beams and columns, interior wood window frame, window, hallways, door frames, exterior walls, exterior columns, eaves, rafters, restroom ceramic tiles, urinals, sink
Building 3632: Old Side School*	Roof mastic, vent pipes, drywall/joint compound, roof core	Interior baseboards, exterior metal gutter, window frames and sills, wall ceramic tiles
Building 3636: – Backgrounds/ Recruitment*	Roof mastic	Wood window casings
Building 3637: Hanger 1*	Roof mastic, HVAC duct mastic, floor tile and mastic, vent pipes	Exterior wood walls and sliding doors, window frames, interior metal walls, doors, drywalls, window casings, stairs and railing, sinks, toilets, wall ceramic tiles, urinal
Garden Shed	–	–
Building 3638: Training*	Baseboard mastic, roof mastic, transite pipe	Plaster wall
Building 3642: War Eagle Tower	Floor tile and mastic, roof mastic, exterior stucco, vent pipes, tile backing and mastic, roof penetration mastic	Wood windows, wood doors, exterior wall, exterior metal railing, window casings, door frames, wall ceramic tiles
Building 3645/6: G Barracks (Hard Lock) and Metal Shop	Window putty, roof mastic	Metal walls, structural steel beams, and metal door
Building 3656: Silver Bullet Theater*	Roof mastic, ceiling tile mastic, wall texture coat, sand plaster wall, transite pipe, vent pipes	–
Building 3929: BOQ*	Floor tiles, HVAC damper and gasket, floor covering, roof mastic, floor tile mastic, exterior stucco, window putty, plaster walls, skim coat	Window sills, door frames, fasciae, beams and rafters, exterior stairs and framework, window cases, ceramic wall tiles, concrete walls, metal pipes and HVAC ducts
Building 3985: Pump House*	Pipe wrap, valve insulation, roof mastic, window putty	–
Building 4165: Kitchen/Dining	Rolled roofing, roof mastic, window putty, pipe insulation, vent pipe	Exterior concrete wall, exterior metal sheet cover, wall ceramic tiles, toilets

**TABLE 4.7-1
ASBESTOS AND LEAD SAMPLING**

Building Number and Name	Building Materials with Asbestos	Building Materials with Lead-Based Paint
Buildings 4268 and 4269: Easy and Fox Barracks	Window putty, roof mastic	Door frames, wall ceramic tiles, sinks
-: None detected; ICE: U.S. Immigration and Customs Enforcement; HVAC: heating, ventilation, and air conditioning unit; FSB: Facilities Services Bureau; BOQ: Bachelor Officers Quarters * outside the Project site Source: Converse 2014a		

Off-site Uses

Off-site buildings that are not part of the Project site but within the MLDC include the hangars (Building 3637), fueling station, water wells and reservoirs and pump house (Building 3985), swimming pool, vehicle service garage, Barracks A-D (Buildings 3626–3629), Silver Bullet (Building 3656), outside maintenance and storage (Buildings 3614–3621), old side canteen (Building 31), old side school (Building 3632), guard towers T1 and T4, and other unnamed buildings at the southwest corner of 60th Street West and West Avenue I.

As part of the Phase I ESA, two hydraulic hoists were observed in the vehicle service garage. Also, the two USTs at the fueling station were found to not have current permits and to have failed leak detection tests in 2013. Off-site buildings (with *) that contain asbestos and LBP are identified in Table 4.7-1 above.

Pipelines

No major pipelines carrying natural gas, fuel, or hazardous materials are present in or near the Project site (PHMSA 2012).

4.7.3 THRESHOLDS OF SIGNIFICANCE

The following significance criteria are derived from the Environmental Checklist in Appendix G of the State CEQA Guidelines. A project would result in a significant adverse impact related to Hazards and Hazardous Materials if it would:

Threshold 4.7a: Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.

Threshold 4.7b: Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.

Threshold 4.7c: Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.

Threshold 4.7d: Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, create a significant hazard to the public or the environment.

- Threshold 4.7e:** For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, result in a safety hazard for people residing or working in the project area.
- Threshold 4.7f:** For a project within the vicinity of a private airstrip, result in a safety hazard for people residing or working in the project area.
- Threshold 4.7g:** Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.
- Threshold 4.7h:** Expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands.

4.7.4 REGULATORY REQUIREMENTS

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

- California Health and Safety Code (Section 39650 et seq.)
- California Code of Regulations (Title 8, Section 1529)
- California Occupational Safety and Health Administration (CalOSHA) regulations (California Code of Regulations, Title 8, Section 1529 [Asbestos] and Section 1532.1 [Lead])

RR HAZ-5 Any Project-related new construction, excavations, and/or new utility lines within 10 feet or crossing existing high pressure pipelines, natural gas/petroleum pipelines, electrical lines greater than 60,000 volts, will be designed and constructed in accordance with the California Code of Regulations (Title 8, Section 1541).

RR HAZ-6 The Project will be designed and constructed in accordance with Part 77 of the Federal Aviation Regulations (FAR), which requires the County to notify the Federal Aviation Administration of proposed construction or alteration within 20,000 feet from the nearest point of the nearest runway of an airport where the structure would extend into a slope of a 100:1 and within 5,000 feet of a heliport where the structure would extend into a slope of a 25:1 from the nearest landing and take-off area of the heliport.

RR HAZ-7 The radio communications tower shall be subject to review by the Los Angeles County Airport Land Use Commission for compliance with the General William J. Fox Airfield Land Use Compatibility Plan.

The following Regulatory Requirements (RRs) are also applicable to Hazards and Hazardous Materials: RR PS-1 and RR PS-2 (from Section 4.12, Public Services and Recreation) and RR TRA-1 through RR TRA-3 (from Section 4.13, Transportation).

4.7.5 ENVIRONMENTAL IMPACT ANALYSIS

Threshold 4.7a: **Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?**

Short-Term Construction Impacts

Demolition, rehabilitation, and construction activities associated with the Project would generate hazardous wastes and would involve the use of hazardous materials that could pose risks to construction workers or lead to soil and groundwater contamination if not properly transported, stored, used, or disposed of.

Vehicles and equipment used for construction of the Project would involve the short-term use of small amounts of hazardous materials including, but not limited to, fuels, lubricating oils, solvents, antifreeze, hydraulic fluid, and compressed gases. In addition, construction activities would utilize some hazardous materials, such as paints and solvents, and would generate hazardous waste streams such as waste oil and empty containers that previously held hazardous materials. The potential exists for an accidental release of these hazardous materials during routine construction activities or routine hazardous materials transport related to construction.

Project-related construction activities also have the potential to result in exposure to these hazardous materials by workers, or by the public, if access to the construction site is not adequately controlled or if the materials are not properly handled and contained. Potential hazards

to workers, the public, and the environment from routine use, transport, or disposal of hazardous materials handled for routine construction would be reduced to the maximum extent practicable through adherence to existing pollution prevention, waste management, worker health and safety, and transportation safety regulations that would apply to the Project, and are summarized in the following paragraphs.

Throughout the demolition and renovation activities, all hazardous wastes and materials would need to be disposed at an off-site permitted facility. To prevent environmental hazards through the transport and disposal of hazardous wastes and materials, a licensed hazardous waste hauler would have to transport and dispose of hazardous materials and wastes in compliance with applicable regulations. Contractors would need to comply with existing regulations, including RR HAZ-1 for proper waste hauling and transport, RR HAZ-2 for proper hazardous waste management and accidental release protocol, and RR HAZ-3 for the proper monitoring and removal of any underground storage tanks.

Additionally, as discussed further in Section 4.8, Hydrology and Water Quality, the Project would be required to obtain coverage under an NPDES permit for discharges of storm water. In order to obtain coverage under the NPDES Construction General Permit, as stated in RR HYD-1, the Project's construction contractor would be required to perform a risk assessment for the proposed development (with differing requirements based upon the determined level) and to prepare and implement an SWPPP, which must include erosion-control and sediment-control BMPs, wind and water tracking controls, hazardous material management practices, and other site-management BMPs that would meet or exceed measures required by the determined risk level of the Construction General Permit. A CSMP that identifies monitoring and sampling requirements during construction is also a required component of the SWPPP.

The NPDES Construction General Permit requires controls of pollutant discharges that utilize best available technology economically achievable (BAT) for toxic pollutants and non-conventional pollutants, and best conventional pollutant control technology (BCT) for conventional pollutants in order to meet water quality standards. These BMPs would need to encompass measures to effectively prevent or minimize pollutants from being discharged in storm water, including but not be limited to measures for proper containment of hazardous materials and frequent inspections to ensure the BMPs practices are in place and effective.

The Project would also be required to comply with CalOSHA standards (RR HAZ-1 and RR HAZ-4) for worker safety in the handling and use of hazardous materials and hazardous wastes. These standards require an employer to monitor worker exposure to hazardous substances and notify workers of exposure to hazardous substances. The regulations specify requirements for employee training, availability of safety equipment, accident-prevention programs, and hazardous substances exposure warnings.

During the site visit, various hazardous materials and wastes were found at the central plant, kitchen/dining, George Barracks/Barracks G (Buildings 3645 and 3646), Buildings 5 and 6, and north of Buildings 2 and 3. Hazards materials and wastes that are present in these buildings would have to be disposed of in accordance with existing regulations to prevent accidental spills or releases (RR HAZ-1). In addition, there were concrete/asphalt areas that were stained with hydraulic oil and located beneath and around the emergency generator at the central plant and beneath the hole punch machine in the George Barracks. As part of the Phase II ESA, soils beneath the equipment at the central plant were tested to determine if subsurface soil contamination has occurred. The testing showed that no soil contamination is present. The hydraulic oil stains on the asphalt/concrete areas would have to be removed and disposed of in accordance with RR HAZ-1.

With compliance with the applicable RRs, potential impacts to the public or the environment during short-term construction related to the transport, use, or disposal of hazardous materials would be less than significant.

Long-Term Operational Impacts

In the long term, operation and maintenance of the proposed Mira Loma Women's Detention Center (MLWDC) would include the handling of hazardous materials (e.g., paints, paint thinners, cleaning solvents, fertilizers, pesticides, motor oil, diesel gasoline, and automotive substances) and/or the generation of hazardous wastes that can lead to the accidental release of these materials (i.e., spills, leaks, misuse, and accidents) and the potential contamination of underlying soils and/or groundwater. Also, there are public health and safety hazards associated with a fire, explosion, or spill involving hazardous materials or wastes. Compliance with existing hazardous material regulations (RR HAZ-1 through RR HAZ-3) would prevent undue hazards. With compliance with the RRs, impacts would be less than significant. No mitigation is required.

Threshold 4.7b: Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Short-Term Construction Impacts

As discussed above, construction activities would utilize hazardous materials, but compliance with existing hazardous material regulations on the storage, use, and disposal of hazardous materials would prevent hazards to the public or the environment.

There is a potential for exposure to asbestos-containing materials and lead-based paint during renovation and/or demolition activities due to the age of some of the existing buildings (i.e., pre-1980s). Demolition of the existing buildings (i.e., visiting restroom and visitor booth, scheduling/training room, armory, facilities service building) and the rehabilitation of other existing buildings could release asbestos fibers that would be hazardous to the demolition crew. Rehabilitation of a number of existing structures may also lead to the release of asbestos fibers, which would be a significant impact.

While most of the building materials have been sampled for asbestos, implementation of MM HAZ-1 would prevent the accidental release of asbestos fibers. MM HAZ-1 requires that, in the event that suspect building materials that have not been previously sampled are observed during renovation/remodeling activities, these materials should be assumed to contain asbestos, until such time that they can be accessed, sampled, and evaluated for asbestos content. The suspect building materials that are not evaluated for asbestos shall be handled, removed, transported and disposed of in compliance with existing regulations that would allow for the proper removal and disposal of ACMs and ACCMs, including AVAQMD Rule 1403 and CalOSHA regulations on asbestos abatement (RR HAZ-4).

AVAQMD Rule 1403 provides guidelines for the proper removal and disposal of ACMs, including prior notification of the AVAQMD and compliance with removal procedures and time schedules; asbestos handling and clean-up procedures; and storage, disposal, and landfilling requirements under this rule. California Health and Safety Code (Section 39650 et seq.) and the California Code of Regulations (Title 8, Section 1529) prohibit emissions of asbestos from asbestos-related demolition or construction activities; require medical examinations and monitoring of employees engaged in activities that could disturb asbestos; specify precautions and safe work practices that must be followed to minimize the potential for the release of asbestos fibers; and require notice

to federal and local government agencies prior to beginning renovation or demolition that could disturb asbestos.

Demolition and renovation activities could also expose the construction and demolition crew to lead from lead-based paint. Per RR HAZ-4, disturbance and removal of lead-painted surfaces must be performed by a State-licensed lead abatement contractor and proper disposal of lead-containing waste must be made based on lead content. Intact painted surfaces do not require stabilization prior to renovation/remodeling or demolition.

Additionally, MM HAZ-2 is needed to ensure that lead exposure is prevented. MM HAZ-2 requires that, in the event that suspect painted or ceramic surfaces that have not been previously sampled are observed during renovation/remodeling activities, these materials should be assumed to contain lead-based paint, until such time that they can be accessed, sampled, and evaluated for lead content. In the event that suspect materials that have not been previously sampled are observed during renovation/remodeling activities, these materials should be assumed to contain lead in concentrations exceeding the Los Angeles County Department of Health Services' definition of 0.7 milligrams per square centimeter (mg/cm², or 600 parts per million), until such time that they can be accessed, sampled, and evaluated for lead content. Implementation of MM HAZ-2 would ensure that impacts associated with exposure to lead-based paint would be less than significant.

The UST at the central plant would not be used or removed by the Project but any future use or removal of this UST would have to be made in accordance with the California Underground Storage Tank Regulations (RR HAZ-3), which requires a tank removal report, soil sampling, and a disposal plan. Any petroleum releases found during soil sampling would require soil and/or groundwater remediation in accordance with the Resource Conservation and Recovery Act; the Certified Unified Program; and the California Accidental Release Prevention Program. No significant impacts are expected with this UST with compliance with RR HAZ-3.

With compliance with RR HAZ-1 through RR HAZ-4 and implementation of MM HAZ-1 and MM HAZ-2, significant impacts expected from the use and disposal of hazardous materials and the potential for accidental release of hazardous materials during construction would be reduced to less than significant levels.

Long-Term Operational Impacts

Two emergency back-up diesel generators would be provided on-site, which may include an aboveground or an underground fuel storage tank. The fuel storage tank would have to be constructed, used, and monitored in accordance with existing regulations (RR HAZ-1 through RR HAZ-3). As discussed above, operation of the Project would also utilize hazardous materials, but compliance with various State, regional, and federal regulations on storage, use, handling, transport, or disposal of hazardous materials and hazardous wastes would prevent accidental releases. These include regular inspection of the USTs at emergency generators, at the fueling island, and north of Building 3 in accordance with the California Underground Storage Tank Regulations and proper storage and disposal of hazardous materials (RR HAZ-1 through RR HAZ-3).

For buildings that would not be renovated or demolished, ACM may remain in place and could release asbestos fibers if disturbed. The presence of released asbestos fibers in buildings where workers/inmates would be exposed on a daily basis would be a significant impact. MM HAZ-1 calls for the development of an Operations and Maintenance (O&M) Plan by a CalOSHA-certified Asbestos Consultant and implementation of the O&M Plan by building maintenance staff who have undergone at least 16 hours of asbestos O&M training. The O&M Plan shall require periodic

observation, inspection, and documentation by designated staff to ensure that ACMs do not become damaged and do not result in airborne asbestos fiber release. Damaged ACMs may be repaired but not removed by staff who have undergone the asbestos O&M training. Any removal would have to be conducted under the direction of a CalOSHA-certified Asbestos Consultant in accordance with RR HAZ-4. Compliance with RRs and implementation of MM HAZ-1 would reduce impacts associated with asbestos exposure to less than significant levels.

Off-Site Impacts

As discussed above, use, storage, disposal, and transport of hazardous materials/wastes during construction of off-site infrastructure improvements would be in compliance with existing regulations. In order to prevent impacts to pipelines and other high priority lines that may be present within or near the proposed water line extension to West Avenue I and other utility trenching and connections, compliance with RR HAZ-5 would require notification of the owner/operator of the existing utility lines to avoid damage to high priority lines. Impacts would be less than significant and no mitigation is required.

West Avenue I and 60th Street West are not designated as hazardous materials and explosives routes by the City of Lancaster. State Route (SR) 14, Sierra Highway, and SR-138 are the designated hazardous materials and explosives routes (Lancaster 2010a). The Project would not be exposed to hazardous material incidents on these designated routes due to distance. With compliance with RR HAZ-5, impacts would be less than significant and no mitigation is required.

Threshold 4.7c: Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

Short-Term Construction Impacts

There are no schools located within 0.25 mile of the Project site. The nearest school is Sundown Elementary School, a public elementary (Kindergarten through 5th grade) school in the Westside Union School District located at 6151 West Avenue J-8 (approximately 1.2 miles south of the Project site). However, an elementary school is proposed on Lancaster Boulevard, east of 50th Street West (approximately 0.70 mile southeast of the site) (Lancaster 2010b). Other schools in the surrounding area are mainly located near existing residential neighborhoods to the south and southeast of the site. A number of vocational and training schools are also present in the surrounding area.

As discussed in Threshold 4.7a above, hazardous materials use would occur during construction of the Project, and these hazardous materials and hazardous wastes would be handled and disposed of in accordance with applicable regulatory requirements (RR HAZ-1 through RR HAZ-4) and thus, would not have a significant adverse effect on nearby schools. Also, construction traffic (including trucks carrying hazardous materials or wastes) would mainly use SR-14 and West Avenue I, as the most direct route to access the site, and would not pass through residential areas or utilize local streets where schools are located.

Long-Term Operational Impacts

Detention activities associated with the Project would not generate hazardous emissions that may affect adjacent land uses, including schools. The Project would use, store, and dispose of hazardous materials, substances, and/or wastes as part of building and grounds maintenance, on-site operations (in the kitchen, medical clinic, laundry/maintenance building, and vocational training buildings). These hazardous materials would be used in accordance with existing

regulations (RR HAZ-1 through RR HAZ-3) and would not pose hazards to on-site inmates, staff, visitors and volunteers or to children in nearby schools. Impacts would be less than significant and no mitigation is required.

Threshold 4.7d: Would the project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, create a significant hazard to the public or the environment?

Short-Term and Long-Term Impacts

The Polaris Flight Academy and Lancaster Training Field previously operated in an area that included the Project site. The War Eagle Field was located on a portion of the MLWDC site, consisting of a pilot training facility and airstrip, with other airfields located north of and outside the site. While the Polaris Flight Academy closed in 1945, and the War Eagle Field was sold to the County in 1947, the DTSC lists the Polaris Flight Academy with a status of "inactive-needs evaluation" as of July 2005 (Converse 2014b). However, the potential media affected and the potential contaminants of concern were not identified. Funding for the evaluation, investigation, or remediation of old airfields is through Defense Environmental Restoration Account (DERA), with the DTSC as the lead agency.

A Phase II ESA was completed for the site as recommended by the Phase I ESA and included soil sampling and analysis at 14 locations to depths up to 8 feet below the ground surface. The findings of the analysis indicate that no volatile organic compounds (VOCs) are present in the soil samples. All reported metals, except arsenic, were found to be at levels below the California Human Health Screening Levels (CHHSLs) for both residential and commercial/industrial land. The arsenic levels are below the background level of 12 mg/kg level that the DTSC has determined to be naturally occurring background levels at school sites in California. Therefore, no mitigation for arsenic levels is required.

The concentrations of total petroleum hydrocarbons (TPH) in the diesel range and heavy hydrocarbon (oil) range were below the Maximum Soil Screening Levels (MSSLs) established by the Los Angeles RWQCB. Concentrations of TPH in the diesel and/or oil ranges exceeded the Regional Screening Levels (RSLs) for residential land use in two samples, but these concentrations are less than the RSLs for commercial/industrial land use. It is suspected that the TPH concentrations in these samples may be elevated as a result of the overlying asphalt surface cover having been mixed into the samples (Converse 2015a).

The TPH concentrations detected in the samples from 2 feet bgs at locations M1 and M10 only slightly exceed RSL for residential land use (RSLr), which is calculated based on an assumption that an individual would be exposed to these concentrations 350 days per year for 30 years. As such, TPH concentrations would not pose a threat to the health of construction workers, who would remain on the Project site only for short periods of time (Converse 2015b).

The risk to long-term Project site occupants (staff, visitors, and inmates) from the TPH concentrations in soil is less than significant based on the assumption that there would not be an exposure pathway. Exposure pathways would include direct touching (dermal contact) or inhalation (breathing dust) of soils with concentrations of TPH that exceeded RSLs in the two samples. The asphalt cover over the soil in these areas would prevent direct contact or the generation of dust. Due to the lack of exposure pathways, these TPH concentrations would not present a significant risk to occupants.

The two borings M2 and M3 completed in the area of the old airstrip had no significant findings, which suggests that historic uses of the site as a flight academy and airstrip did not lead to soil contamination (Converse 2015b).

The MLDC is listed in government databases as a hazardous waste generator (Converse 2014b). However, the facility is no longer in use. Existing hazardous materials and wastes that remain at various buildings at the site would have to be removed and disposed of properly in accordance with existing regulations (RR HAZ-1 through RR HAZ-4). Future hazardous material use would also be made in accordance with existing regulations, as discussed under Threshold 4.7a above.

There is an on-site UST at the central plant that failed leak detection tests and has not been corrected (Converse 2014a). This UST would not be used or removed as part of the Project. Any future use or removal of this UST would need to be made in accordance with the California Underground Storage Tank Regulations, as overseen by the LACFD (RR HAZ-3). This would avoid the creation of any potential hazards.

Other hazardous material users and hazardous waste generators in the surrounding area located near the site are not expected to affect the Project due to their distance. Impacts related to past hazardous materials use at the site would be less than significant with compliance with RRs.

Off-Site Impacts

The proposed water line extension would be connected to the water main within West Avenue I. Connection to this main line would either occur from the Project's driveway on 60th Street West, continuing within 60th Street West to West Avenue I, or would traverse through the Project site near the helipad. Under either connection scenario, the water line connection would not require the acquisition of right-of-way; the alteration of ongoing activities at adjacent structures or land uses; or the creation of a significant hazardous condition that may affect adjacent land uses. No impact would occur and no mitigation is required.

The existing fueling station is outside the Project site boundary but may be used by the Project. This fueling station has two USTs that failed leak detection tests. Thus, the continued use of these USTs may lead to future spills, leaks, and/or releases of diesel fuel into the soils that would not be detected and could result in potential soil and groundwater contamination. Repair of these USTs is required by the regulatory oversight agencies whether or not the MLWDC Project proceeds. As such, remediation of the USTs is not a component of the proposed Project; however, use of the fueling station could exacerbate an existing hazard. If the MLWDC Project would use the fueling station, then MM HAZ-3 shall be implemented to repair UST detection systems and monitoring of these USTs in accordance with RR HAZ-3.

There are two hydraulic hoists in the Vehicle Fleet Garage that have the potential to have led to subsurface soil contamination at the pits of the hoists. The Phase I ESA states that when the hydraulic hoists are removed, the soils beneath the pits shall be sampled to determine the presence of contamination. If the results of the testing show that chemical levels are present above regulatory levels, remediation and/or removal of the contamination would have to be with the oversight of applicable regulatory agencies such as the LACSD, the AVAQMD, the DTSC, and/or the U.S. Environmental Protection Agency in compliance with established MCLs. Also, the hoists and hydraulic oil would have to be disposed in accordance with existing regulations for hazardous waste disposal. However, the Vehicle Fleet Garage is located outside the Project site and no renovation of this building or removal of the Hydraulic hoists is proposed as part of the Project.

Implementation of MM HAZ-3 and compliance with RR HAZ-3 would prevent hazards to the Project from off-site areas. Impacts would be less than significant after mitigation.

Threshold 4.7e: For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?

Short-Term and Long-Term Impacts

The nearest airport to the site is the General William J. Fox Airfield, which is located 2.3 miles north of the site. This general aviation airport is owned by the County of Los Angeles and serves as a flight training facility for aircraft and pilots from the Los Angeles Basin and as an air attack base for U.S. Forest Service firefighting aircraft (Los Angeles County ALUC 2004). This airport has 154 based aircraft and an average of 224 aircraft operations per day (AirNav 2015).

The General William J. Fox Airfield Land Use Compatibility Plan shows that the Project site is located in Zone E of the Airport Influence Area of the Fox Airfield. Zone E has no requirements or limits on development density or intensity but prohibits hazards to flight and requires ALUC review of objects over 100 feet tall (Los Angeles County ALUC 2004). The Project does not propose hazards to flight (e.g., glare, dust, or electrical interference; landfill or agricultural use; stadiums; or amphitheaters). The highest existing structure on the site is a water tank at approximately 100 feet above ground and the highest proposed structure is a 180-foot high communications tower, while the proposed 2-story transitional housing buildings would be approximately 30 feet tall. An Aviation Application will need to be submitted to the ALUC for the proposed communications tower to determine compliance with the compliance with the General William J. Fox Airfield Land Use Compatibility Plan (RR HAZ-7). Any ALUC requirements would have to be implemented by the Project to ensure that no hazards to flight operations at Fox Airfield are created by the tower. No conflict with the General William J. Fox Airfield Land Use Compatibility Plan would occur with the implementation of RR HAZ-7 and no hazards to airport operations would be created by the Project.

In accordance with RR HAZ-6, an application filing shall be submitted to the FAA to secure a determination that the proposed tower structure will not pose hazards to air navigation. The determination from the FAA will also prescribe whether the communications tower should be marked and lighted for aeronautical safety. If FAA obstruction marking is required, the communications tower would be painted in seven bands of equal height in alternating colors of aviation orange and white, starting with aviation orange at the bottom. If FAA obstruction marking is not required, the galvanized tower will be unpainted. Also, if FAA obstruction lighting is required, the communications tower would be equipped with (1) one steady-burning red light with one light/lamp fixture on each tower leg 75 feet above the ground and (2) two flashing red lights or omni-directional beacons on top of the communications tower. These lights would serve as warning signs to pilots of the presence of the communications tower. Compliance with FAA regulations (RR HAZ-6) would prevent hazards to aircraft overflights.

Other nearby airports include the Los Angeles/Palmdale Regional Airport (U.S. Air Force Plant 42), which is located 7.5 miles southeast of the site, and the Edwards Air Force Base, which is approximately 23.0 miles to the northeast. The site is located outside the Airport Influence Areas of these airports (Los Angeles County ALUC 1991). Thus, the Project would not affect airport or aircraft operations at these airports.

The Project site is located within the designated High Risk of Adverse Impact Zone (HRAIZ) of nearby military airports, as shown in the County General Plan. However, the Project would not

produce electromagnetic and frequency spectrum interference. The Project would also not release into the air any substance such as steam, dust and smoke. Dust from temporary construction activities would be reduced by dust control measures, as discussed in Section 4.2, Air Quality. In addition, the Project would not produce light emissions, glare or distracting lights with the implementation of MM AES-1, as discussed in Section 4.1, Aesthetics. Also, the Project would not obstruct the HRAIZ since the proposed communications tower would have to comply with FAA regulations, as discussed above.

Impacts related to airport or aircraft operations would be less than significant with Project compliance with RR HAZ-6 and RR HAZ-7. No airport safety hazard to inmates or people working at or visiting the Project would occur. No mitigation is required.

Threshold 4.7f: For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?

Short-Term and Long-Term Impacts

There are private airstrips near the site. Bohunk's Airpark is located approximately 2.0 miles west of the site and Little Buttes Airfield is approximately 6.5 miles northwest of the site. The Agua Dulce Skypark is located 14.0 miles southwest of the site. Also, there is a helipad at the northeast corner of the MLWDC. This helipad is used once each day by Los Angeles County Sheriff's Department helicopters for crew relief, and the Project would not change the frequency of landings and take-offs from this helipad.

The Project does not propose hazards to flight (as discussed under Threshold 4.7e above) and does not involve the construction of buildings that would be higher than existing structures at the site (the highest of which is an existing water tank approximately 100 feet above the ground). Thus, no hazards to airstrip operations would occur.

The helipad will remain in place at the northeastern corner of the Project site. No improvements are proposed at the helipad, but it is anticipated to continue to be used by Sheriff's Department helicopters. In accordance with FAA guidelines (Title 14 Part 77 of the CFR), the approach zone for civil helipads is defined by an imaginary surface extending out 4,000 feet to a width of 500 feet and at a slope of 8:1 from the Final Approach and Takeoff Area (FATO) of the helipad. The transitional zone is defined by an imaginary surface extending out at a slope of 2:1 from the FATO and on both sides of the approach zone.

The Project does not propose structures near the helipad. The heights of the existing dormitory housing and portables (which are located south of the helipad) and the kitchen (to the southwest of the helipad) would not be changed. Only the renovation of these existing buildings is proposed.

The transitional housing—which is proposed as 2-story buildings to be located south of the existing dormitory housing and portables and 440 feet from the helipad—would be approximately 30 feet tall. These buildings would not be located within the FATO, the approach zone, or the transitional zone of the on-site helipad.

The proposed food warehouse/laundry and maintenance building would be located just northwest of the kitchen. The closest corner of the proposed warehouse building would be about 440 feet from the center of the helipad. This building would be within the helipad's approach zone and transitional zone and would be approximately 450 feet from the FATO. This building would be approximately 30 feet tall and would not exceed the minimum height clearance of 55 feet. Based on the Federal Aviation Regulations (FAR), this building would not extend into the imaginary surfaces for heliports and thus, would not present obstructions to navigable airspace.

The proposed fencing near the helipad would be 11 feet high on 2 sides (the "open ends") and 14 feet high on the other 2 sides (the facility perimeter fence). The fence would be about 150 feet from the center of the helipad. Given an 8:1 FATO slope, the minimum height clearance would be 18 feet, 9 inches. Thus, the proposed fencing would also not affect helipad operations.

The proposed radio communications tower would be 180 feet high and would be located outside of the restricted approach zone, or the transitional zone of the on-site helipad. Since this distance from the helipad will be more than 1,440 feet (at which the FAA height limit is 180 feet), the proposed tower would not present obstructions to navigable airspace. Compliance with RR HAZ-6, as discussed above, would also allow the tower to be designed (in accordance with FAA painting and lighting requirements) to avoid obstructions to navigable air space and prevent hazards to aircraft and helicopters.

Compliance with FAR Part 77 Regulations (RR HAZ-6) would avoid impacts to helipad and helicopter operations. Impacts would be less than significant with compliance with RR HAZ-6 and no mitigation is required.

Threshold 4.7g: Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Short-Term Construction Impacts

Construction activities at the site would not affect emergency response or evacuation of adjacent developments since activities would be confined to the site. All internal roadways would remain accessible during construction activities.

Long-Term Operational Impacts

In the event of a disaster, disturbance, or emergency, the emergency procedures that have been developed for the Project would be followed, as required by RR PS-2 in Section 4.12, Public Services and Recreation. In accordance with Title 15 of the *California Code of Regulations*, MLWDC's policy and procedures manual must outline emergency procedures that include and/or address evacuations, fire suppression, and natural disasters. In addition, the MLWDC's policy and procedures manual would include facilities and procedures that the Los Angeles County Sheriff's Department would use in the event of an emergency at the Project. The Los Angeles County Fire Department would review the Project's building plans to ensure that adequate access for emergency vehicles and evacuation routes are available at the site, as required by RR PS-2 in Section 4.12, Public Services and Recreation.

Existing developments near the site have emergency access to public roadways, which would not be affected by the Project. Long-term operation of the Project would not interfere with emergency response or evacuation of adjacent land uses. The Project site is served by a developed roadway network (including West Avenue I and 60th Street West) that would provide emergency access and evacuation routes to existing developments on and near the site.

The City of Lancaster has an adopted Hazard Mitigation Plan (HMP) that analyzes the potential for each hazard; the losses and damage that could be sustained; and the resources available to the City to address each hazard. The HMP also details the goals and strategies that would be implemented to prepare for, prevent, or reduce the different hazards in the City (Lancaster 2013). The City's Emergency Operations Plan (EOP) also establishes the procedures that the City and other cooperating agencies will follow in the event of an emergency. These procedures would reduce personal injury and property damage and would facilitate recovery operations. The Project would not obstruct implementation of the City of Lancaster's HMP or the EOP. No adverse impacts

would occur with compliance of RR PS-1 and RR PS-2, as set forth in Section 4.12, Public Services and Recreation.

Off-Site Impacts

During short-term construction activities for the water line extension and connection, trenching within West Avenue I and potentially in 60th Street West would be required. Associated driveway repairs may also be required. Potential travel lane obstruction would be minimized by compliance with RR TRA-1 through RR TRA-3, which require the implementation of temporary traffic-control measures for the maintenance of access to individual lots; vehicle traffic and pedestrian safety; reduced congestion and traffic flow interruptions; and notification of emergency personnel.

In the long-term, no change to the existing roadways and their alignments are proposed by the driveway improvements. Therefore, no change in emergency access or emergency evacuation routes would occur with the proposed Project. Rather, driveway improvements would facilitate emergency response and evacuation.

Under the City's EOP, major streets and freeways in the City would serve as evacuation routes, provided they are functional. West Avenue I, West Avenue J, and other major arterials have been identified as local evacuation routes, and SR-14, Sierra Highway, and SR-138 have been identified as regional evacuation routes (Lancaster 2009b). Driveway improvements on West Avenue I would comply with RR TRA-2 as set forth in Section 4.13, Transportation and Traffic, to minimize traffic lane obstruction. Construction activities at the Project site would not obstruct evacuation procedures or implementation of the City's HMP.

The Project may temporarily impact adjacent roadways during construction, although no new driveways are proposed. In compliance with RR TRA-2, construction activities at the site entrances on West Avenue I and 60th Street West shall comply with the Greenbook to limit roadway obstruction and the need for temporary detours. As such, roadways that provide access to the Project site and the surrounding areas would not be impacted during project construction in a way that would physically impair or impede emergency response or evacuation in the City of Lancaster. Potential impacts to emergency evacuation plans would be less than significant. With continued implementation of the City's HMP and EOP and compliance with RR TRA-1 through RR TRA-3, as set forth in Section 4.13, Transportation and Traffic, impacts related to emergency response and evacuation would be less than significant, and no mitigation is required.

Threshold 4.7h: Would the project expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

Short-Term and Long-Term Impacts

Sections 4201–4204 of the *California Public Resources Code* and Sections 51175 –51189 of the *California Government Code* direct the California Department of Forestry and Fire Protection (CAL FIRE) to map areas of significant fire hazards. The maps identify Fire Hazard Severity Zones (Very High, High, and Moderate) where the application of various mitigation strategies is needed to reduce risks associated with wildland fires. The Fire Hazard Severity Zones were developed using a computer model that factors in the fire history; existing and potential fuel (natural vegetation); flame length; blowing embers; terrain; and typical weather for an area. The severity of the hazard is based on a likelihood that, over a 30- to 50-year period, an area will burn without fuel-reduction efforts. Given the results of the modeling, the State identifies an area as a “moderate”, “high”, or “very high” Fire Hazard Severity Zone.

The Project site is not located within a Very High Fire Hazard Severity Zone. The site is at least 4.5 miles from the edge of the Very High Fire Hazard Severity Zones at the Sierra Pelona Mountains to the southwest (CAL FIRE 2011). However, brush fire hazards are possible at the adjacent undeveloped lands to the north, northwest, and southwest. The site is separated from these large vacant lands by public streets (i.e., West Avenue I and 60th Street West).

The Project would be built in accordance with the County Building Code and County Fire Code (RR PS-1) and would not create fire hazards. Also, no uses are proposed by the Project on the site that may lead to brush fires at the surrounding areas. Thus, impacts would be less than significant, and no mitigation is required.

4.7.6 CUMULATIVE IMPACTS

The cumulative impacts related to hazards and hazardous materials are analyzed for the Antelope Valley as a whole. Existing developments in the Valley pose risks to public health and safety, as they relate to the use, storage, handling, generation, transport, and disposal of hazardous materials and wastes. The Project and future growth and development in the Valley would increase these risks as more facilities or operations utilize hazardous materials and/or generate hazardous wastes.

Hazardous material spills, fire, and/or explosions and soil/groundwater contamination may potentially occur with land uses or developments that handle these materials in large quantities. However, there are numerous regulations that serve to protect public health and safety at all levels of government. Federal, State, regional, and County agencies are responsible for regulating hazardous materials use, storage, handling, generation, transport, and disposal throughout the Valley. Monitoring and enforcement by the LACFD, as the CUPA, would increase compliance with existing regulations and reduce hazards.

The Project would comply with existing regulations and would implement the mitigation measures outlined below. Compliance by other projects with pertinent regulations would preserve public health and safety and would prevent the creation of health risks and public safety hazards. Therefore, the Project and future development in the Antelope Valley are not expected to present significant risks to public health and safety. Future development projects in the Valley would also need to be made part of emergency planning efforts for natural or manmade disasters that may occur in the area.

Proposed developments would be subject to review and approval by the LACFD for fire safety and preparedness, as well as the provision of adequate emergency access and evacuation. Compliance with pertinent requirements of the County Fire Department would prevent the creation of fire hazards and would reduce public safety hazards. Cumulative adverse impacts would be less than significant.

4.7.7 MITIGATION MEASURES

MM HAZ-1 In the event that building materials are encountered during construction activities that are suspected of being asbestos-containing materials (ACMs), these materials shall be assumed to contain asbestos and shall be handled, removed, transported and/or disposed in accordance with applicable ACM regulations, until such time that they can be sampled and evaluated for asbestos content.

Prior to Project occupancy, an Operations and Maintenance (O&M) Plan shall be prepared by a CalOSHA-certified Asbestos Consultant and implemented by building maintenance staff who have undergone at least 16 hours of asbestos

O&M training. The O&M Plan shall be subject to review and approval by the County of Los Angeles Director of Public Works and shall require periodic observation, inspection, and documentation by designated staff to ensure that ACMs do not become damaged and do not result in airborne asbestos fiber release. Any required removal of asbestos shall be made under the direction of a CalOSHA Certified Asbestos Consultant.

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

MM HAZ-3 Prior to the use of the off-site fueling station by any Project-related activities, including any construction activities, the underground storage tanks (USTs) at the off-site fueling station shall be tested and repaired as necessary, subject to inspection and approval by the Los Angeles County Fire Department, as the Certified Unified Program Agency (CUPA).

4.7.8 LEVEL OF SIGNIFICANCE AFTER MITIGATION

Direct, indirect, and cumulative impacts related to hazards and hazardous materials would be less than significant after the implementation of MM HAZ-1 through MM HAZ-3. No significant unavoidable direct, indirect, or cumulative impacts related to hazards or hazardous materials would occur.

4.7.9 REFERENCES

AirNav, LLC (AirNav). 2015 (April 30, FAA information effective date). KWJF: General Wm J Fox Airfield, Lancaster, California, USA. Atlanta, GA: AirNav. <http://www.airnav.com/airport/KWJF>.

Antelope Valley Air Quality Management District (AVAQMD). 2015a (April, access date). Regulation X: National Emissions Standards for Hazardous Air Pollutants. Lancaster, CA: AVAQMD. <http://www.avaqmd.ca.gov/index.aspx?page=112>.

———. 2015b (April, access date). Regulation XIV: Toxics and Other Non-Criteria Pollutants. Lancaster, CA: AVAQMD. <http://www.avaqmd.ca.gov/index.aspx?page=116>.

———. 1989 (October, as amended through 1994). Rule 1403: Asbestos Emissions from Demolition/Renovation Activities. Lancaster, CA: AVAQMD. <http://www.avaqmd.ca.gov/Modules/ShowDocument.aspx?documentid=747>.

California Department of Forestry and Fire Protection (CAL FIRE). 2011 (September). Los Angeles County - Very High Fire Hazard Severity Zones in LRA as Recommended by CAL FIRE. Sacramento, CA: CAL FIRE.

Converse Consultants. 2015a (March). *Phase II Environmental Site Assessment Report, Mira Loma Women's Village, 45100 60th Street West, Lancaster, California*. Monrovia, CA: Converse.

- . 2015b (March 19). Personal communications. Emails among K. Starbird, Senior Project Manager (BonTerra Psomas), L. Tanaka, Manager (Converse Consultants) and A. Ramos, Project Manager (Los Angeles County Department of Public Works).
- . 2014a (September). *Asbestos & Lead-based Paint Survey Report, Mira Loma Detention Facility, 45100 60th Street West, Lancaster, California*. Monrovia, CA: Converse.
- . 2014b (May). *Phase I Environmental Site Assessment Report, Mira Loma Detention Facility and Transitional Facility (AB900), 45100 60th Street West, Lancaster, California*. Monrovia, CA: Converse.
- . 2014c (June 30). *Limited Asbestos and Lead Sampling Report, Building/Barrack 7, Mira Loma Detention Facility, 45100 60th Street West, Lancaster, California*. Monrovia, CA: Converse.
- . 2013 (January 2). *Limited Asbestos and Lead-based Paint Survey Report, Mira Loma Detention Facility, 45100 60th Street West, Lancaster, California*. Monrovia, CA: Converse.
- Lancaster, City of. 2013 (September 4, adopted). *2013 City of Lancaster Hazard Mitigation Plan*. Lancaster, CA: the City.
- . 2010a. *Emergency Operations Plan 2010*. Lancaster, CA: the City.
- . 2010b (September 6). Tract Status Map. Lancaster, CA: the City.
- . 2009a (July 14, adopted). *City of Lancaster General Plan 2030*. Lancaster, CA: the City. <http://www.cityoflancasterca.org/Index.aspx?page=427>.
- . 2009b (April). *General Plan 2030 Master Environmental Assessment*. Lancaster, CA: City of. <http://www.cityoflancasterca.org/Modules/ShowDocument.aspx?documentid=11352>.
- Los Angeles, County of. 2015 (last update). *Los Angeles County, California – Code of Ordinances*. Tallahassee, FL: Municode Corporation for the County. <https://library.municode.com/index.aspx?clientId=16274>.
- Los Angeles County Airport Land Use Commission (Los Angeles County ALUC). 2004 (December 1). *General William J. Fox Airfield Land Use Compatibility Plan*. Los Angeles, CA: Los Angeles County ALUC.
- . 1991 (December, adopted, as revised through 2004). *Los Angeles County Airport Land Use Plan*. Los Angeles, CA: Los Angeles County ALUC.
- Pipeline and Hazardous Materials Safety Administration (PHMSA). 2012. National Pipeline Mapping System. Search for Los Angeles County, California. Washington, D.C.: PHMSA. <https://www.npms.phmsa.dot.gov/PublicViewer/composite.jsf>.

4.8 HYDROLOGY AND WATER QUALITY

This section analyzes the Project's potential impacts on hydrology and water quality, based on information from the Hydraulics/Hydrology and Site Storm Drainage System (Hydrology Report) prepared by VCA Engineers dated August 13, 2014 and provided in Appendix F-1, the Preliminary Site Water Supply and Distribution Analysis Narrative (Water Report) prepared by VCA Engineers dated January 23, 2015 and provided in Appendix F-2, the Evaluation Report and Peer Review of Wet Utilities prepared by Psomas dated May 11, 2014 and provided in Appendix F-3, and the Mira Loma Women's Detention Center Facility Water Supply Assessment prepared by Psomas dated May 2015 and provided in Appendix G-2.

4.8.1 RELEVANT PROGRAMS AND REGULATIONS

Federal

Clean Water Act and National Pollutant Discharge Elimination System

In 1972, the Federal Water Pollution Control Act (or Clean Water Act [CWA]) was adopted to reduce water pollution. The CWA was amended in 1977 to establish the National Pollutant Discharge Elimination System (NPDES) Program, which regulates the discharge of pollutants into "waters of the U.S." from point sources. In 1987, the CWA was again amended to require that the U.S. Environmental Protection Agency (USEPA) establish regulations for non-point sources, such as municipal and industrial discharges of storm water and non-storm water. The USEPA published final regulations for storm water and non-storm water discharges on November 16, 1990. The regulations require that municipal separate storm sewer system (MS4) discharges to surface waters be regulated by an NPDES permit. MS4s are systems of conveyances (including roads with drainage systems, municipal streets, catch basins, curbs, gutters, ditches, manmade channels, or storm drains) used for collecting or conveying storm water (but not wastewater or combined sewage) that are owned or operated by a public agency with jurisdiction over the disposal of sewage, industrial wastes, storm water, or other wastes.

In addition, the CWA requires States to adopt water quality standards for water bodies. Water quality standards consist of designated beneficial uses for a particular water body (e.g., wildlife habitat, agricultural supply, fishing), along with the water quality criteria necessary to support those beneficial uses. Water quality criteria are prescribed concentrations or levels of constituents (e.g., lead, suspended sediment, and fecal coliform bacteria) or narrative statements that represent the quality of water necessary to support a particular beneficial use. Because California has not established a complete list of acceptable water quality criteria, the USEPA established numeric water quality criteria for certain toxic constituents in the form of the California Toxics Rule (see *Code of Federal Regulations*, Title 40, Section 131.38).

National Flood Insurance Program

The Federal Emergency Management Agency (FEMA) administers the National Flood Insurance Program (NFIP), which provides flood insurance, floodplain management, and flood hazard mapping. Communities subject to flood hazards voluntarily participate in the NFIP by adopting and enforcing floodplain management ordinances that would reduce the potential for flood damage. In turn, the NFIP offers federally funded flood insurance to homeowners, renters, and business owners in participating communities. Under this program, FEMA produces Flood Insurance Rate Maps (FIRMs) that identify properties and buildings in flood insurance risk areas. Flood hazards related to storm events are generally described in terms of the 100- or 500-year floods. These are floods that, respectively, have a 1.0 percent and 0.2 percent chance of occurring every year.

State

California Porter-Cologne Act

The Porter-Cologne Water Quality Control Act of 1970 (California Porter-Cologne Act) grants the State Water Resource Control Board (SWRCB) and the Regional Water Quality Control Boards (RWQCBs) broad powers to protect water quality in the State and to implement California's responsibilities under the Federal CWA. Under the Porter-Cologne Act, the SWRCB and the RWQCBs are responsible for (1) adopting plans and policies for water quality control; (2) regulating discharges to surface water and groundwater; (3) regulating waste disposal sites; and (4) requiring the cleanup of discharges of hazardous materials and other pollutants. The Porter-Cologne Act also establishes reporting requirements for unintended discharges of any hazardous substance, sewage, and oil or petroleum products.

Each RWQCB has adopted a water quality control plan for its region to reflect the policies in the Porter-Cologne Act and other State policies for water quality control. These plans include water discharge prohibitions applicable to particular conditions, areas, or types of wastes within the region. The RWQCBs implement the plans by (1) enforcing set discharge limitations; (2) preventing violations of the limitations; and (3) conducting investigations to determine the quality of any "waters of the State". Civil and criminal penalties are imposed on persons who violate the requirements of the Porter-Cologne Act or any SWRCB/RWQCB order.

Water Quality Control Plan – Lahontan Region

The Project site and the City of Lancaster are within the jurisdictional boundaries of the Lahontan RWQCB. The Water Quality Control Plan for the Lahontan Region (Basin Plan) took effect in 1995, replacing earlier versions, and designates beneficial uses and water quality objectives for surface and groundwater bodies in the region, with specific water quality standards for the Lake Tahoe basin. The Basin Plan also identifies water quality problems that can threaten beneficial uses in the region. Required or recommended control measures for water quality problems and discharge prohibitions are included in the Basin Plan. Water quality objectives for point source pollutants are achieved through Waste Discharge Requirements (WDRs) and NPDES permit programs, while water quality objectives for non-point source pollutants are achieved through pollution prevention through local regulations; discharge prohibitions; public outreach programs; implementation of Best Management Practices (BMPs); 401 Water Quality Certification programs; and investigations, cleanup, and regulatory enforcement actions, as necessary.

Water Quality Control Plan – Los Angeles Region

The County is a permittee of NPDES Permit No. CAS004001, Order No. R4-2012-0175 and, therefore, the Project site is subject to the Water Quality Control Plan: Los Angeles Region Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties (Basin Plan), which took effect in 1994 (LARWQCB 1995). The Basin Plan is designed to preserve and enhance water quality and protect the beneficial uses of all regional waters. The Basin Plan provides quantitative and narrative criteria for a range of water quality constituents applicable to certain receiving water bodies and groundwater basins in the Los Angeles Region. The Basin Plan (1) designates beneficial uses for surface and ground waters; (2) sets narrative and numerical objectives that must be attained or maintained to protect the designated beneficial uses and to conform to the State's antidegradation policy; and (3) describes implementation programs to protect all waters in the Region. Water quality objectives for point source pollutants are achieved through WDRs and NPDES permit programs, while water quality objectives for non-point source pollutants are achieved through pollution prevention through local regulations; discharge prohibitions; public

outreach programs; implementation of BMPs; 401 Water Quality Certification programs; and investigations, cleanup, and regulatory enforcement actions, as necessary.

NPDES General Permit No. CAS000004 (Small MS4 General Permit)

In 1990, the U.S. Environmental Protection Agency (USEPA) promulgated rules establishing Phase I of the NPDES storm water program. The Phase I program for MS4s requires operators of “medium” and “large” MS4s, that is, those that generally serve populations of 100,000 or greater, to implement a storm water management program as a means to control polluted discharges from these MS4s. On December 8, 1999, U.S. EPA promulgated Phase II storm water regulations under authority of the Clean Water Act section 402(p)(6). The Phase II Storm Water requires State Water Board to issue NPDES storm water permits to operators of Small MS4s.

On April 30, 2003, the State Water Board adopted Water Quality Order No. 2003-0005- DWQ, NPDES General Permit CAS000004 WDRs for Storm Water Discharges from Small Municipal Separate Storm Sewer Systems (General Permit). The term Small MS4s includes systems similar to separate storm sewer systems in municipalities, such as systems at military bases, large hospital or prison complexes, and highways and other thoroughfares. Order No. 2013-001-DWQ modified the Small MS4 Permit by establishing the storm water management program requirements and defining the minimum acceptable elements of a municipal storm water management program. The City of Lancaster is a small MS4 and was subject to the previous Small MS4 Permit but is no longer subject to the new NPDES General Permit No. CAS00004 (Small MS4 Permit) because there are no surface waters in the City and storm water runoff from the City does not discharge into waters of the State.

Thus, projects within the City of Lancaster are under the jurisdiction of the Lahontan RWQCB and only subject to the Lahontan RWQCB's WDRs. Since the Project is a County of Los Angeles project on County-owned property, on-site Project activities will have to comply with the Los Angeles County MS4 Permit and the County's Storm Water Management Program, while off-site activities will have to comply with the NPDES General Construction Permit.

National Pollutant Discharge Elimination System Permit No. CAS004001 (Municipal Separate Storm Sewer System Permit)

The NPDES Storm Water Program requirements for Phase I dischargers (i.e., medium and large MS4s with populations of 100,000 or more) are set forth in NPDES Permit No. CAS004001, Order No. R4-2012-0175, which reflects the most recent updates in November 2012. Los Angeles County is a permittee under this Permit. The Permit's requirements include three fundamental elements: (1) a requirement to effectively prohibit non-storm water discharges through the MS4; (2) requirements to implement controls to reduce the discharge of pollutants to the maximum extent practicable (MEP); and (3) other provisions the Regional Water Board has determined appropriate for the control of such pollutants. Pursuant to Section 13263(a) of the *California Water Code*, the requirements of this Permit implement the Water Quality Control Plan – Los Angeles Region (Basin Plan).

Order No. R4-2012-0175 is more explicit in identifying non-storm water discharge prohibitions; setting effluent and receiving water limitations and compliance requirements with waste load allocations and total maximum daily loads (TMDLs); spelling out the responsibilities of the permittees (including public information and outreach, source tracking, construction tracking, inspection, development controls, local ordinances, progressive enforcement and interagency coordination); and listing the requirements for public agency activities and facilities (including the storm drain system).

Minimum control measures for construction and storm water management are outlined in the permit, along with source-control BMPs for commercial and industrial facilities and performance criteria for new development. Select BMPs for all construction sites (including those less than one acre) are also required through each permittee's erosion- and sediment-control ordinance or building permit. The new Los Angeles County MS4 Permit also provides an option for permittees to develop a watershed management program to comply with the permit requirements.

Construction General Permit Order No. 2009-0009-DWQ, as amended

Pursuant to Section 402(p) of the CWA, the SWRCB issued a statewide NPDES General Permit for storm water discharges from construction sites (Order No. 2009-0009-DWQ, as amended by Order No. 2010-0014-DWQ and Order No. 2012-0006-DWQ). The SWRCB's NPDES General Permit for Stormwater Discharges Associated with Construction and Land Disturbance Activities is referred to as the "Construction General Permit". Under the Construction General Permit, storm water discharges from construction sites with a disturbed area of one or more acres or whose projects disturb less than one acre but are part of a larger common plan of development are required to either obtain individual NPDES permits for storm water discharges or to be covered by the Construction General Permit.

Storm water discharges must not contain pollutants that cause or contribute to an exceedance of any applicable water quality objectives or water quality standards contained in a Statewide Water Quality Control Plan, the California Toxics Rule, the National Toxics Rule, or the applicable Regional Water Board's Water Quality Control Plan (Basin Plan). Coverage under the Construction General Permit requires completion of Permit Registration Documents (PRDs), which includes a Notice of Intent (NOI), and a construction site risk assessment to determine appropriate coverage level and preparation of a Storm Water Pollution Prevention Plan (SWPPP). The SWPPP must include BMPs to be implemented during construction, site maps, a Construction Site Monitoring Program (CSMP), and sediment basin design calculations. The primary objective of the SWPPP is to ensure that the responsible party properly constructs, implements, and maintains BMPs to reduce or eliminate pollutants in storm water discharges and authorized non-storm water discharges from the construction site. The SWPPP shall also outline the monitoring and sampling program to verify compliance with discharge Numeric Action Levels (NALs) set by the Construction General Permit.

The Construction General Permit also includes post-construction requirements for projects to match pre-project runoff volume through the use of non-structural or structural measures. For sites larger than two acres, a project shall also maintain the site's pre-project runoff rate.

General Permit for Storm Water Discharges from Small Municipal Separate Storm Sewer Systems (MS4) Water Quality Order No. 2013-0001-DWQ

This General Permit establishes the storm water management program requirements and defines the minimum acceptable elements of the municipal storm water management program. The term Small MS4s includes systems similar to separate storm sewer systems in municipalities, such as systems at military bases, large hospital or prison complexes, and highways and other thoroughfares.

Consistent with Clean Water Act section 402(p)(3)(B)(iii), this Order requires controls to reduce pollutants from the MS4 to the maximum extent practicable (MEP). The MEP standard requires Permittees to apply Best Management Practices (BMPs) that are effective in reducing or eliminating the discharge of pollutants to the waters of the U.S. MEP emphasizes pollutant reduction and source control BMPs to prevent pollutants from entering storm water runoff. MEP may require treatment of the storm water runoff if it contains pollutants.

To apply for General Permit coverage authorizing storm water discharges to surface waters pursuant to this Order, the Permittees shall electronically file a Notice of Intent (NOI) using SMARTS and mail the appropriate permit fee to the State Water Board. The NOI represents the Permittee's commitment to comply with the BMPs specified in this Order to achieve compliance with the minimum control measures specified at 40 Code of Federal Regulations sections 122.34 (b)(1) through (b)(6).

Title 24 Green Building Standards Code

The California Green Building Standards Code (*California Code of Regulations*, Title 24, Part 11) (CalGreen Code) requires the use of green building principles and practices in site planning and building design to promote energy and water efficiency and conservation, material conservation and resource efficiency, and environmental quality. The voluntary and mandatory standards in the code apply to the planning, design, operation, construction, use and occupancy of new low-rise and high-rise residential buildings, newly constructed non-residential buildings, building additions of 1,000 square feet or greater, and/or building alterations with permit valuations of \$200,000 or above.

The CalGreen Code requires the development of SWPPPs and implementation of construction BMPs on construction sites smaller than one acre and provides standards for the following, among others: bicycle parking; carpool, vanpool, and electric vehicle spaces; light and glare reduction; grading and paving; energy efficient appliances; renewable energy; graywater systems; water efficient plumbing fixtures; construction waste management; recycling and recycled materials; equipment and systems testing and operations; pollutant controls (including moisture control and indoor air quality); acoustical control; storm water management; building design; insulation; and flooring and framing. Beyond these standards, optional Tier 1 status can be achieved by complying with voluntary measures, which would result in 15 percent less energy use and 30 percent less indoor water use than required by existing regulations. Optional Tier 2 status can be achieved by complying with voluntary measures, which would result in 30 percent less energy use and 35 percent less indoor water use than required by existing regulations.

Low Impact Development Practices

In 2005, the SWRCB decided to consider sustainability in all State and regional board policies, guidelines, regulatory actions, activities, and programs. Sustainable storm water management includes Low Impact Development (LID) practices that preserve water supply and protect water quality through site design that maintains the site's pre-development runoff rates and volumes. By incorporating ways to infiltrate, filter, store, evaporate, and detain runoff on site, less ground disturbance and impervious surfaces are created; natural features are conserved; and smaller infrastructure is required. LID is achieved by providing a variety of measures including bioretention basins, rain gardens, rooftop gardens, sidewalk storage, vegetated swales or buffers, tree preservation, roof leader disconnection, rain barrels and cisterns, and permeable pavers on individual development sites. The SWRCB provides technical information on LID practices; advocacy and outreach to local governments; encourages the incorporation of LID practices in storm water permits; offers grants for LID projects; and collaborates with other agencies on improving water quality in the State.

County

Stormwater and Runoff Pollution Control Ordinance

The County has complied with its obligations under the MS4 Permit through the adoption of the Stormwater and Runoff Pollution Control Ordinance (Chapter 12.80 of the Los Angeles County Code) that prohibits illicit discharges; manages runoff into and from its MS4s; and requires BMPs for new development and major redevelopment projects. The prohibitions include illicit connections to the storm drain system; littering or discharge of polluting or damaging substances, hazardous materials and sewage on streets, storm drain systems, or drainage channels; industrial and commercial activity discharges; and uncontrolled discharges. The ordinance requires implementation of good housekeeping practices; construction BMPs; and BMPs for industrial and commercial facilities, including their registration and inspection.

Standard Urban Stormwater Mitigation Plan

In compliance with the County's MS4 Permit and Stormwater and Runoff Pollution Control Ordinance, a Standard Urban Stormwater Mitigation Plan (SUSMP) is required for certain new development and significant redevelopment projects in Los Angeles County. A SUSMP must identify structural or treatment-control BMPs that would be constructed as part of the project in order to (1) infiltrate or treat the first $\frac{3}{4}$ inch of rainfall for each storm event; (2) control peak flow discharge; and (3) reduce post-development discharge of pollutants into storm water conveyance systems. The SUSMP is reviewed and approved as part of the plan check process.

Projects subject to SUSMP requirements include single-family hillside homes with 1 acre or more of surface area; residential developments with 10 or more dwelling units; automotive service facilities; restaurants; retail gasoline outlets; outdoor storage, horticulture and manufacturing facilities; animal facilities; parking lots with 5,000 square feet or more of surface area or with 25 or more parking spaces; redevelopment projects with 5,000 square feet or more of new surface area or that alter more than 50 percent of existing impervious surfaces; and projects that create 2,500 square feet or more of impervious surface area and are located within, directly adjacent to, or that discharge into an environmentally sensitive area if the discharge is likely to affect sensitive biological species or habitats.

Low Impact Development Standards

Chapter 12.84 of the Los Angeles County Code establishes LID standards to reduce pollutants in storm water runoff; to minimize pollutant loadings from development; and to minimize erosion and other hydrologic impacts on natural drainages. The standards specify design requirements for developments disturbing 1 acre or more of land; commercial and industrial projects with 10,000 square feet or more of surface area; retail gasoline outlets, restaurants, new automotive facilities, and parking lots with 5,000 square feet or more of surface area or 25 or more parking spaces; developments adjacent to or discharging directly into a Significant Ecological Area (SEA); and redevelopment projects that create, replace, or add 5,000 square feet or more of impervious area or alter 50 percent or more of the existing impervious surfaces; and redevelopment that creates, replaces, or adds 10,000 square feet or more of impervious area to a site developed with a single-family home. The LID requirements include hydrologic analysis to determine the existing and proposed runoff volumes and rates and implementation of the appropriate LID BMPs to retain the storm water quality design volume on site through infiltration, evapotranspiration, rainfall harvest and use, or a combination of BMPs. At least two LID BMPs are required for non-designated projects, and exemptions are provided for the repair of flood-control facilities; storm drains and transportation networks; redevelopment that does not increase the effective impervious area or decrease the infiltration capacity of pervious areas; projects that would not cause

hydromodification impacts; non-designated projects disturbing less than 1 acre and creating less than 10,000 square feet of impervious area; and single-family homes that incorporate LID BMPs.

Green Building Standards Code

Title 31 of the Los Angeles County Code adopts the 2013 CalGreen Code by reference for the planning, design, operation, construction, use, and occupancy of every newly constructed building or structure in the County. This ordinance amends specific sections of the CalGreen Code by requiring compliance with non-residential mandatory measures and specific voluntary measures in the Code; sets post-construction landscape design requirements; calls for compliance with the County's LID Ordinance; and mandates greater recycling and/or salvage of construction and demolition (C&D) debris.

4.8.2 EXISTING CONDITIONS

Surface Hydrology

The Project site is located within the South Lahontan Watershed, which drains into a closed basin. Stormwater flows in the region generally flow northeasterly towards Rosamond Lake. Storm water from the Project site generally sheet flows from paved areas to landscaped and unpaved areas throughout the site, as shown in Exhibit 4.8-1, Existing On-site Drainage Patterns. Existing catch basins are located near the kitchen loading dock area of the Project site that conveys flows off-site to the shallow earthen drainage along West Avenue I. There is not a complete on-site storm drain system to capture flows throughout the site. Existing catch basins and storm drain lines are limited to the northwestern section of the site, as shown in Exhibit 4.8-2. The majority of runoff from the Project site is surface sheetflow that moves to the east and southeast toward the solar energy facility and undeveloped land to the east. Runoff then flows into a shallow drainage along the southern boundary of the Challenger Memorial Youth Center, which then connects to the earthen drainage channel along 50th Street West. This channel conveys runoff in a northerly direction toward the earthen channel along West Avenue I. Storm water percolates into the earthen channels or flows northeasterly to the Piute Ponds and Rosamond Lake.

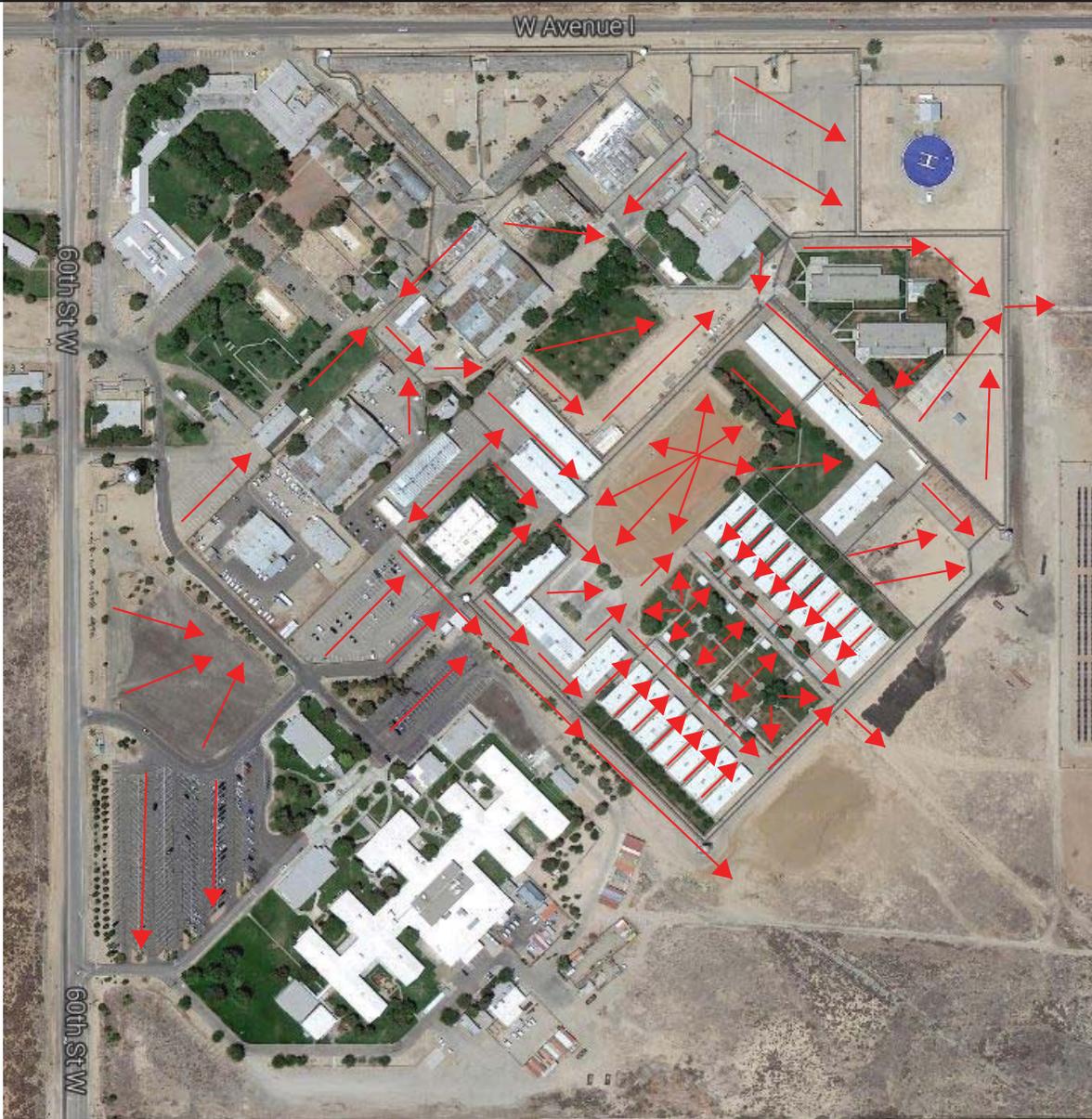
Water Quality

Water bodies that do not meet water quality standards are considered "impaired" under Section 303(d) of the federal Clean Water Act, and responsible RWQCBs are required to develop TMDLs for the impairing pollutant(s). A TMDL is an estimate of the total load of pollutants from point, non-point, and natural sources that a water body may receive without exceeding applicable water quality standards (with a factor of safety). Once established, the TMDL is allocated among current and future pollutant sources that discharge to the water body. There are no 303(d) water bodies near the site or in areas downstream of the site (SWRCB 2011).

Groundwater Resources

The Antelope Valley Groundwater Basin underlies the western Mojave Desert and is bound by the Garlock Fault to the northwest and the San Andreas Fault to the southwest. Perennial runoff from the surrounding mountains and hills is the primary source of recharge of the groundwater basin, with minor recharge from irrigation water and septic system effluent. While historic groundwater movement in the valley was northeasterly toward Rosamond Lake, Rogers Lake, and Buckhorn Lake, groundwater pumping has altered flows in Lancaster and Edwards Air Force Base and has led to land subsidence and earth fissures. Approximately 292 square miles of the Antelope Valley has experienced subsidence of more than 1 foot, which has reduced aquifer storage by 50,000 acre-feet (DWR 2004).

D:\Projects\COLACEO\001\Graphics\EIREx_OnSiteDrainagePatterns_20151023.ai



Source: DLR Group 2015

Existing On-Site Drainage Patterns

Exhibit 4.8-1

Mira Loma Women's Detention Center



The upper (principal) aquifer is the primary source of groundwater in the Antelope Valley, with the lower (deep) aquifer separated from the upper aquifer by clay layers. Estimates of groundwater pumping in 1919 was 29,000 acre-feet per year and increased to 400,000 acre-feet per year in the 1950s. For many years, groundwater pumping was greater than recharge and significant declines in groundwater levels have occurred. However, changes in groundwater levels varied in different parts of the Antelope Valley between 1975 and 2011, with decreases of over 30 feet and increases of over 30 feet in different areas.

Around 1999, agricultural interests in the Antelope Valley initiated litigation in State court seeking to determine certain rights to groundwater. In 2005, certain public water suppliers, including the Los Angeles County Waterworks District No. 40, filed a cross-action seeking an adjudication of groundwater rights within the Basin. Other agencies and parties have filed separate actions concerning groundwater rights in the Antelope Valley Area of Adjudication (AVAA). The Court has coordinated and consolidated the actions in one action in Los Angeles Superior Court. Four phases of the trial have been completed in the adjudication during which the court has defined the adjudication area boundary (i.e., the AVAA) and determined that the total safe yield of the AVAA is 110,000 AFY, that the AVAA has been in a state of overdraft for over 50 years, and the current pumping by the parties exceeds the safe yield of the AVAA. The action will result in a judgment (by trial and/or stipulation) containing a final allocation of groundwater rights and a long-term groundwater management system for the AVAA (Psomas 2015b).

While water quality in the principal aquifer is generally good, high levels of fluoride, boron, total dissolved solids, arsenic and nitrate have been found in some portions of the Antelope Valley Groundwater Basin (RWMG 2013). Groundwater drinking wells located at the California State Prison, Los Angeles County (CSP-LAC) that historically served the CSP-LAC were closed in 2013 due to high levels of naturally occurring arsenic, resulting in a connection to the County Water Works District 40 to provide for the CSP-LAC's water supply (WWD 40 2015).

The groundwater basin's Lancaster Subunit underlies the cities of Lancaster and Palmdale, and the communities of Quartz Hill, Rosamond, Antelope Acres, and other smaller communities. Groundwater levels in 2006 were estimated at 2,230 feet above mean sea level (RWMG 2013) or 120 feet below ground surface (bgs) at the site. Review of *Historically Highest Groundwater Map*, Plate No. 1.2 in the Seismic Hazard Zone Report for the Lancaster West 7.5-minute Quadrangle (1998) indicates that the historic high groundwater level at the site ranges from approximately 110 to 150 feet or more bgs. However, on-site soil borings have indicated the presence of perched groundwater at 27 feet bgs at the site (Converse 2014).

The Mira Loma Detention Center (MLDC) has two active water wells, a pumping booster station (with four pumps), and two reservoirs on the site. Water from Well No. 3 is pumped into the lower reservoir (at-grade concrete reservoir) and to the upper reservoir (overhead steel tank) that uses gravity to serve the facility. Well No. 4 is an emergency well that is tested every week. An abandoned well (Well No. 2) is located near the active wells (Psomas 2013). County of Los Angeles records of well production from 2009 to 2012 are provided in Table 4.8-1.

**TABLE 4.8-1
HISTORIC WELL PRODUCTION**

Year	Water Production (acre-feet)		
	Well No. 3	Well No. 4	Total
2009	371.90	20.16	392.06
2010	336.13	1.64	337.77
2011	358.65	4.49	363.14
2012	294.56	4.02	298.58

Source: County of Los Angeles 2014.

4.8.3 THRESHOLDS OF SIGNIFICANCE

The following significance criteria are derived from the Environmental Checklist in Appendix G of the State CEQA Guidelines. A project would result in a significant adverse impact related to Hydrology and Water Quality if it would:

- Threshold 4.8a:** Violate any water quality standards or waste discharge requirements.
- Threshold 4.8b:** Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted).
- Threshold 4.8c:** Substantially alter the existing drainage pattern of the site or area, including the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site.
- Threshold 4.8d:** Substantially alter the existing drainage pattern of the site or area, including the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site.
- Threshold 4.8e:** Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site, create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems, or provide substantial additional sources of polluted runoff.
- Threshold 4.8f:** Otherwise substantially degrade water quality.
- Threshold 4.8g:** Place housing within a 100-year flood hazard area as mapped on a Federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map.
- Threshold 4.8h:** Place within a 100-year flood hazard area structures which would impede or redirect flood flows.

Threshold 4.8i: Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam.

Threshold 4.8j: Result in inundation by seiche, tsunami, or mudflow.

4.8.4 PROJECT DESIGN FEATURES

PDF HYD-1 The Contractor's Specifications will require that the Project will be designed and constructed in accordance with the following requirements of the Los Angeles County Department of Public Works for the incorporation of source-control, site-design, and treatment-control BMPs to reduce pollutants in the storm water and to reduce runoff rates and volumes to match existing conditions:

- 2002 Standard Urban Stormwater Mitigation Plan (SUSMP)
- 2006 Hydrology Manual
- 2009 County's Low Impact Development (LID) Standards Manual
- 2010 Green Building Standards Code (California Code of Regulations Title 24, Part 11)
- 2012 Best Management Practices Handbook

PDF HYD-2 The Contractor's Specifications will require that the Project will be designed and constructed in accordance with the County's Stormwater and Runoff Pollution Control Ordinance (Chapter 12.80 of the Los Angeles County Code), which prohibits illicit discharges; manages runoff into and from its Municipal Separate Storm Sewer Systems (MS4s); and requires BMPs for new development and major redevelopment projects.

4.8.5 REGULATORY REQUIREMENTS

RR HYD-1 The Project will be constructed in accordance with the National Pollutant Discharge Elimination System (NPDES) General Permit for Storm Water Discharges Associated with the Construction and Land Disturbance Activities, Order No 2009-0009-DWQ, NPDES No. CAS000002 (or the latest approved Construction General Permit). Compliance requires filing a Notice of Intent (NOI); a Risk Assessment; a Site Map; a Storm Water Pollution Prevention Plan (SWPPP) and associated Best Management Practices (BMPs); an annual fee; and a signed certification statement.

RR HYD-2 The Project will be constructed and operated in accordance with the National Pollutant Discharge Elimination System (NPDES) General Permit for Storm Water Discharges from Small Municipal Separate Storm Sewer Systems (MS4), Order No 2013-0001-DWQ, NPDES No. CAS000004 (or the latest approved MS4 General Permit). Compliance requires controls to reduce pollutants from the MS4 to the maximum extent practicable (MEP). The MEP standard requires Permittees to apply Best Management Practices (BMPs) that are effective in reducing or eliminating the discharge of pollutants to the waters of the U.S., and emphasizes pollutant reduction and source control BMPs to prevent pollutants from entering storm water runoff.

4.8.6 ENVIRONMENTAL IMPACT ANALYSIS

Threshold 4.8a: Would the project violate any water quality standards or waste discharge requirements?

Threshold 4.8f: Would the project otherwise substantially degrade water quality?

Short-Term Construction Impacts

The Project would involve demolition, rehabilitation, and construction activities that would generate pollutants that may enter storm water runoff. These activities may lead to sediments, building materials and wastes, and other on-site materials entering the storm water drainage system. Storm water runoff from the site could contain pollutants (e.g., loose soils and sediments from grading and excavation activities) and petroleum-related pollutants due to spills or leaks from heavy equipment and machinery. Common pollutants that may be generated by construction activities include solid or liquid chemical spills; concrete and related cutting or curing residues; wastes from paints, stains, sealants, solvents, detergents, glues, acids, lime, plaster, and cleaning agents; and heavy metals from equipment.

Construction site runoff would sheet-flow across the Project site and into adjacent drainage channels and would contribute to pollutants in the storm water if not treated. The CWA establishes a framework for regulating potential water quality impacts from construction activities through the NPDES program. As stated in RR HYD-1, the Project's construction contractor would be required to obtain coverage under the NPDES Construction General Permit. This permit requires the discharger to perform a risk assessment for the proposed development (with differing requirements based upon the determined level) and to prepare and implement an SWPPP, which must include erosion-control and sediment-control BMPs, wind and water tracking controls, hazardous material management practices, and other site-management BMPs that would meet or exceed measures required by the determined risk level of the Construction General Permit.

The Permit requires controls of pollutant discharges that utilize best available technology economically achievable (BAT) for toxic pollutants and non-conventional pollutants, and best conventional pollutant control technology (BCT) for conventional pollutants in order to meet water quality standards. Compliance with the requirements of the NPDES Construction General Permit (RR HYD-1) would ensure that the Project does not violate water quality standards or substantially degrade water quality. Short-term construction impacts on water quality would be less than significant, and no mitigation is required.

Long-Term Operational Impacts

Potential storm water pollutants that could be generated by operation of the Project could come from parking areas, landscaped areas, and outdoor activities. Pollutants of concern that may be generated by the Project include, but may not be limited to those discussed below:

- **Sediments (Total Suspended Solids [TSS] and Turbidity).** Excessive erosion, transport, and deposition of sediment in surface waters can impair receiving water quality.
- **Nutrients (Nitrogen and Phosphorus).** Nutrients are inorganic forms of nitrogen and phosphorus. There are several sources of nutrients in runoff from urban areas, but potential sources from the Project site include fertilizers in runoff from lawns, atmospheric deposition, and vehicular emissions.
- **Trace Metals (Copper, Lead, Zinc).** The primary anthropogenic sources of trace metals in storm water are commercially available metals used in transportation, buildings, and

infrastructure. Metals are also found in fuels, adhesives, paints, and other coatings, and are found naturally as a part of minerals in geologic formations. Copper, lead, and zinc are the metals most frequently found in urban runoff.

- **Petroleum Hydrocarbons.** The sources of oil, grease, and other petroleum hydrocarbons in urban areas include spillage of fuels and lubricants; discharge of domestic and industrial wastes; atmospheric deposition; and runoff. Runoff can be contaminated by leachate from asphalt roads, wearing of tires, and deposition from vehicular exhaust.
- **Trash and Debris.** Trash (such as paper, plastic, polystyrene packing foam, and aluminum materials) and biodegradable organic debris (such as leaves, grass cuttings, and food waste) are general waste products on the landscape that can be entrained in urban runoff.

A TMDL is an estimate of the total load of pollutants from point, non-point, and natural sources that a water body may receive without exceeding applicable water quality. Once established, the TMDL is allocated among current and future pollutant sources that discharge to the water body. There are no 303(d) water bodies near the site or in areas downstream of the site, and therefore, there are no applicable TMDLs for water quality for the Project.

As stated in RR HYD-2, the Project would be constructed and operated in accordance with the National Pollutant Discharge Elimination System (NPDES) General Permit for Storm Water Discharges from Small Municipal Separate Storm Sewer Systems (MS4), Order No 2013-0001-DWQ, NPDES No. CAS000004 (or the latest approved MS4 General Permit). Compliance requires controls to reduce pollutants from the MS4 to the maximum extent practicable (MEP). The MEP standard requires Permittees to apply Best Management Practices (BMPs) that are effective in reducing or eliminating the discharge of pollutants to the waters of the U.S., and emphasizes pollutant reduction and source control BMPs to prevent pollutants from entering storm water runoff.

As stated under PDF HYD-1, the on-site storm drainage system would comply with storm water quality and quality control requirements under the County's SUSMP, LID standards, Hydrology Manual, Best Management Practices Handbook, and Green Building Standards Code. These requirements, along with RR HYD-2, address potential pollutant runoff from long-term operations of the Project and includes a drainage concept and storm water quality plan that reduces peak storm water runoff discharge rates; conserves natural areas; minimizes storm water pollutants of concern; protects slopes and channels; provides storm drain system stenciling and signage; properly designs outdoor material storage areas and trash storage areas; and provides proof of ongoing maintenance of structural or treatment-control BMPs that would prevent pollutants from entering the runoff. Exhibit 4.8-2, Proposed Storm Water Treatment BMPs, shows a conceptual plan that identifies the proposed location of catch basins that would have filter inserts and the storm drain lines that would lead to an underground retention system and storm water infiltration structure to be located at the open field at the center of the site. Overflows from the underground structure and storm water from catch basins at the northern section of the site would go into a bubbler catch basin at the northern edge of the site that would discharge storm water into West Avenue I. Two bubbler catch basins would be provided at the eastern edge of the site (to take in overflows from the underground structure and storm water from catch basins) that would discharge storm water into bioswales that would treat storm water, as well as reduce flow rates and volumes. The provision of these BMPs would reduce the pollutants from storm water runoff associated with operation of the Project.

In addition, the proposed storm drainage system would be designed to convey the peak flow rate from the 25-year, 24-hour rainfall event. As discussed in the Hydrology Report (Appendix F-1 of this EIR), the post-development peak volume that would be required to be mitigated under $\frac{3}{4}$ inch



- Proposed Storm Drain Line
- Underground Infiltration Structure
- Bioswale (Low Impact Development Treatment)
- Drainage Structure with filter inserts
- Storm Drain Line
- Existing Catch Basin
- Existing Manhole
- Bubbler Catch Basin and pre-treatment structure
- Bubbler Catch Basin

Bubbler catch basin overflow to adjacent dirt areas (per existing conditions)

Drainage structures will take in the incoming drainage flows

Source: DLR Group 2015

Proposed Stormwater Treatment BMPs

Exhibit 4.8-2

Mira Loma Women's Detention Center



of rainfall was determined based on the Los Angeles County Department of Public Works' SUSMP Manual. Using a ¾-inch 24-hour storm event, the Project would result in a Stormwater Quality Design Volume (SQDV) of approximately 90,000 cubic feet.

The proposed underground retention system and infiltration structure would be sized accordingly with consideration of the percolation rate provided by the geotechnical engineer and would be adequate to capture and treat the calculated SQDV. The drawdown volume capacity must be verified and calculated to meet a minimum of 48 hours for all the water infiltrated through the system. Total capacity and retention volume of storm water runoff of the infiltration structures would accommodate the storm water runoff from the Project site. An overflow line would be provided to discharge treated storm water to the adjacent drainage along West Avenue I or undeveloped area (within the Project property), as approved by the jurisdictional agency. In addition, the Design-Build contractor will include a pre-treatment method of cleaning the storm water runoff (e.g., filter inserts in catch basins, continuous deflection separation system [CDS] or other equal products that will remove sediments and other pollutants from the runoff prior to its conveyance to the infiltration system or discharge area). As part of PDF HYD-1, the County would also provide a maintenance program that includes the following:

- a. Inspection and removal of sediment, debris, and other pollutants in containment chambers and detention structures per manufacturer recommendations.
- b. Collection and removal of sediment and debris (e.g., litter, leaves, papers, cans) within the areas around the trench drains and catch basins with filter inserts.
- c. Sweeping, the frequency of which will be based on the amount of sediment and debris generated.

Under PDF HYD-2, the Project will be designed and constructed in accordance with the County's Stormwater and Runoff Pollution Control Ordinance, which prohibits the discharge of specific pollutants into storm water and requires implementation of BMPs to reduce pollutants in the storm water, as outlined in Section 12.80 of the Los Angeles County Code. The prohibitions include illicit connections to the storm drain system; littering or discharge of polluting or damaging substances, hazardous materials, and sewage on streets, storm drain systems, or drainage channels; industrial and commercial activity discharges; and uncontrolled discharges. This ordinance also requires implementation of good housekeeping practices; construction BMPs; and permanent structural and non-structural BMPs.

The Design-Build contractor would have to finalize the proposed on-site drainage system based on final construction plans and would have to comply with the requirements discussed above. Implementation of PDF HYD-1 and PDF HYD-2 and compliance with RR HYD-2 would ensure that storm water pollutants generated at the Project site would be adequately treated. Operational impacts related to the violation of water quality standards and substantial degradation of water quality would be less than significant, and no mitigation is required.

Off-Site Impacts

Construction activities for the water line extensions and connection to the main water line within West Avenue I, and any associated driveway improvements or temporary trenching activities, would have to be conducted in compliance with an SWPPP (RR HYD-1), which would reduce pollutants in storm water runoff. Once constructed, the driveways and water line extensions and connection would not generate pollutants that could enter the storm water. Impacts related to the violation of water quality standards and substantial degradation of water quality would be less than significant and no mitigation is required.

Threshold 4.8b: **Would the project substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?**

Short-Term Construction Impacts

The Project site is underlain by the Antelope Valley Groundwater Basin, which serves as the main water source for the City of Lancaster and the Antelope Valley (DWR 2004). Groundwater beneath the site is expected to be found between approximately 27 feet bgs (based on soil borings) and 120 feet bgs (RWMG 2013). Excavation and grading activities for the Project would not extend to 27 feet or more bgs. Therefore, excavation and grading would not directly affect the underlying groundwater resources.

Construction pollutants at the Project site may be carried by storm water and may percolate into the ground. However, implementation of BMPs in the SWPPP for the Project (RR HYD-1) would reduce pollutants in the storm water and would reduce their potential to affect underlying groundwater resources. Since the MLDC is not currently in active use, water needed for dust control and construction activities may be provided by the on-site water wells, replacing existing water use from minor maintenance and security activities. Construction activities are temporary in nature and would not result in a substantial depletion of groundwater supplies that could result in a lowering of the groundwater table. Impacts to groundwater supplies or recharge during construction would be less than significant.

Long-Term Operational Impacts

Water service to the Project would be provided by the Los Angeles County Waterworks District 40 (LACWWD40), with water supplies coming from groundwater supplies and from imported sources of the State Water Project through the Antelope Valley –East Kern Water Agency (AVEK). The existing on-site wells would not be used for long-term operations at the Project site. The availability of water supplies to serve the Project from existing entitlements and resources is discussed in Section 4.14, Utilities and Service Systems.

The Project site does not serve as a groundwater recharge area. The site is largely developed with existing buildings, pavement, and other site improvements. While an increase in impervious surfaces at the site would occur due to new buildings and pavements, the Project would include bioswales and an underground retention and infiltration structure that would collect and allow treated storm water to percolate into the ground. No change in ground percolation and no impact on groundwater recharge would occur with the Project. Thus, no impact to underlying groundwater resources in the Antelope Valley would occur with the Project and no mitigation is required.

Threshold 4.8c: **Would the project substantially alter the existing drainage pattern of the site or area, including the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?**

Short-Term Construction Impacts

The site is developed and runoff flows southeasterly and easterly off site and into existing drainage channels. During construction of the Project, exposed soils in areas where new structures are proposed or where existing structures have been demolished may be subject to

erosion during heavy rains or high winds. RR HYD-1 requires implementation of erosion-control BMPs to be outlined in the Project's SWPPP, which is required for coverage under the NPDES Construction General Permit. These BMPs would reduce wind and water erosion during short-term construction activities. Compliance with RR HYD-1 would prevent erosion and siltation from short-term construction activities. Impacts related to the alteration of drainage patterns and potential for substantial erosion or siltation would be less than significant and no mitigation is required.

Long-Term Operational Impacts

In the long-term, the Project would change the drainage patterns of the site. With the Project, an increase in the amount of impervious surfaces would occur due to new structures and paved areas that would be built. This would reduce the potential for wind and water erosion on-site. However, increases in impervious surfaces would result in increased storm water runoff and decreased infiltration. Increased storm water runoff could result in erosion if site improvements are not conducted in compliance with applicable regulations.

As shown on Exhibit 4.8-2, Proposed Stormwater Treatment BMPs, on-site storm water runoff would be directed into a new storm water drainage system that would discharge to approximately three discharge points at the site boundaries. The conceptual storm drainage plan for the Project shows storm drain lines, catch basins equipped with filters, bioswales, and an underground retention and infiltration structure that would treat, collect and percolate storm water into the ground, which would alter existing drainage patterns on-site.

Changes in on-site drainage patterns would occur in specific areas of the site where new structures or pavements are proposed on open ground and where ground elevations are altered. Although local drainage patterns would change as new structures are built on site and a new storm drain system is implemented, runoff from the site would continue to flow into the off-site storm drain system that serves the area, similar to existing conditions.

Due to the Project's compliance with the County's Green Building Standards Code, LID Ordinance, and SUSMP requirements, which require the incorporation of permanent BMPs into the Project design to prevent erosion and to require the maintenance of pre-project storm water runoff rates (PDF HYD-1 and PDF HYD-2), as well as compliance with the MSF General Permit (RR HYD-2), the Project would not significantly increase runoff from the site. Storm water runoff would be retained within the treatment-control BMPs (catch basin inserts and bioswales) and infiltration BMPs (underground retention and infiltration structure) to reduce storm water runoff rates at the three discharge points to pre-development conditions. Although storm water volumes may increase slightly due to the estimated increase in the impervious surfaces that would occur with the Project (7.63 acres or 17 percent of the site), the storm water runoff rates would be maintained at pre-Project levels.

The use of bioswales and an underground retention and infiltration structure would decrease storm water runoff rates that would be discharged at off-site locations. The County's LID Ordinance requires that storm water runoff flow rates be retained at pre-development conditions to ensure that no hydromodification impacts occur at downstream areas. Implementation of PDF HYD-1, PDF HYD-2, and RR HYD-2 would prevent erosion and siltation from long-term operational activities. Impacts related to the alteration of drainage patterns and potential for substantial erosion or siltation would be less than significant and no mitigation is required.

Off-Site Impacts

Changes in drainage patterns during construction of the water line extension and connection and associated driveway improvements would be temporary and erosion-control and sediment-control BMPs implemented as part of the SWPPP (RR HYD-1) would reduce erosion impacts during construction. Upon completion, the driveways would be at-grade and the water line extensions and connection would be underground. Thus, they would not cause any substantial changes in drainage patterns or lead to substantial erosion or siltation. Impacts associated with the three storm drain outlet points, as conceptually depicted on Exhibit 4.8-2, Proposed Stormwater Treatment BMPs, are discussed above. Impacts related to the alteration of drainage patterns and potential for substantial erosion or siltation from off-site improvement would be less than significant and no mitigation is required.

Threshold 4.8d: **Would the project substantially alter the existing drainage pattern of the site or area, including the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?**

Threshold 4.8e: **Would the project substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site; create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?**

Short-Term and Long-Term On-Site Impacts

As previously discussed, the site is largely developed and would remain developed, with an overall increase in impervious surfaces. Changes in drainage patterns would be confined to areas of the site where new structures and pavements are proposed and where ground elevations are altered. The Project proposes to develop a new on-site storm drain system, which would include new storm drain lines; catch basins equipped with storm water treatment features; bioswales; and an underground infiltration retention structure to remove pollutants from the storm water and to prevent an increase in runoff rates, as provided under PDF HYD-1. The bioswales and underground infiltration retention structure would not only remove pollutants from the storm water but would also allow treated water to percolate into the ground. Thus, decreases in storm water runoff rates would occur where runoff is discharged to the adjacent drainage channels or undeveloped areas.

The increase in the estimated impervious surfaces that would occur with the Project (an additional 7.63 acres of impervious area or approximately of 17 percent of the Project site) would be coupled with the infiltration that would occur with the bioswales and underground retention and infiltration structure and the proposed three separate points of runoff discharge. Thus, an increase in runoff rates is not expected and an upgrade of the off-site storm drain channel serving the site would not be required. The Project would have limited impact on the capacity of existing storm drain facilities serving the site and no downstream flooding would be created by the Project.

As discussed above, compliance with the County's LID Ordinance would retain storm water runoff flow rates at pre-development conditions. Thus, no exceedance of the capacity of existing drainage systems or off-site flooding would occur. At the same time, treatment-control BMPs required by the County's Green Building Standards Code and SUSMP requirements would remove pollutants in the runoff. Under PDF HYD-1, the reduction in storm water pollutants exiting the site would prevent negative impacts to storm water quality at downstream storm drain facilities or drainages. The Project would also not create a need for larger storm drain lines and channels

at off-site locations. Impacts related to the alteration of drainage patterns and the potential for flooding and pollutants in the runoff would be less than significant and no mitigation is required.

Off-Site Impacts

Changes in drainage patterns during construction of the water line extension and connection and associated driveway improvements would be temporary and erosion-control and sediment-control BMPs implemented as part of the SWPPP (RR HYD-1) would reduce surface runoff impacts during construction. The proposed driveway improvements would be at-grade and the water line extensions and connection would be placed underground. Also, they would not measurably increase impervious surfaces or runoff volumes or rates due to the limited areas of disturbance and paving. No flooding would occur and no new storm drain facilities would be needed by these off-site improvements and no mitigation is required.

Threshold 4.8g: Would the project place housing within a 100-year flood hazard area as mapped on a Federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?

Threshold 4.8h: Would the project place within a 100-year flood hazard area structures which would impede or redirect flood flows?

Short-Term and Long-Term On-Site Impacts

As depicted in Exhibit 4.8-3, Flood Hazards, neither the Project site nor the off-site improvement areas are located within the 100-year floodplain (areas subject to inundation by a 1.0 percent annual chance flood) or the 500-year floodplain (areas subject to inundation by a 0.2 percent annual chance flood), as mapped by FEMA (FEMA 2008). This includes areas with 1 percent annual chance flood with average depths less than 1.0 foot or with drainage areas less than 1.0 square mile and areas protected by levees from 1.0 percent annual chance flood. The 500-year floodplain is located to the west, southeast, and northeast of the site but does not include the site.

The Project would not be exposed to flood hazards. The site is developed and proposed structures would increase impervious areas, but the proposed bioswales and underground infiltration retention structure provided to comply with the County's LID Ordinance would retain storm water runoff flow rates at pre-development conditions (PDF HYD-1). This would also prevent flooding on-site and off-site. No inmate housing would be placed within the 100-year flood hazard area and proposed structures would not impede or redirect flood flows in adjacent areas. No impacts related to flooding or the redirection of flood flows would occur and no mitigation is required.

Threshold 4.8i: Would the project expose people or structures to a significant risk of loss, injury, or death involving flooding, including flooding as a result of the failure of a levee or dam?

Short-Term and Long-Term On-Site Impacts

The Fairmont Reservoir has a 493-acre-foot capacity and is located along the Los Angeles Aqueduct, west of the site. Adjacent to the reservoir is the older Fairmont Dam, which is no longer in use (Lancaster 2010). The Safety Element of the previous Los Angeles County General Plan showed the site within the inundation area for the Fairmont Reservoir. Thus, the Project site could be subject to potential inundation in the event of dam failure (LACDRP 1990).

The California Department of Water Resources Division of Safety of Dams (DSOD) regulates and monitors dams for structural safety, in accordance with Division 3, Dams and Reservoirs, of the



Project Site



Zone X - Areas of 0.2% annual chance flood; areas 1% annual chance flood with average depths of less than 1 foot or with drainage areas less than 1 square mile; and areas protected by levees from 1% annual chance flood.



Zone X - Areas determined to be outside the 0.2% annual chance floodplain.



Source: FEMA 2008

Flood Hazards

Exhibit 4.8-3

Mira Loma Women's Detention Center



California Water Code. The City of Los Angeles' (who owns the reservoir) compliance with the DSOD requirements would reduce the potential for dam failure. The Emergency Operations Plan for the City of Lancaster also states that this reservoir is rarely filled to capacity and failure of the reservoir would confine waters in the dam, while failure of the reservoir and dam would release waters toward 160th Street West, which would dissipate at 110th Street West, approximately 5 miles west of the Project site (Lancaster 2010).

The reservoir and dam are located approximately 11.5 miles west of the site and the potential inundation area consists largely of undeveloped land. It is also expected that waters from the dam and reservoir would dissipate at 110th Street West (Lancaster 2010). Thus, inundation due to failure of the dam and reservoir is not expected to result in large amounts of water reaching the site. Also, the Project does not propose the construction of a dam or a large water body that may pose inundation hazards to the surrounding area. This impact would be less than significant. No mitigation is required.

Threshold 4.8j: Would the project result in inundation by seiche, tsunami, or mudflow?

Short-Term and Long-Term On-Site Impacts

Seiches are large waves generated in enclosed bodies of water in response to ground shaking. In the event of an earthquake, a seiche can occur and potentially cause major flooding and water inundation damage. The Geohazard Study Report states that seiches do not appear to pose a hazard to the site (Converse 2014).

There are no large open water bodies in or near the site that may pose seiche hazards to the Project or that would subject the site to inundation hazards from a seiche. Apollo Lake is a recreational fishing lake located within Apollo Park, on the eastern side of the General William J. Fox Airfield. This lake is located approximately 3.0 miles to the northeast of the site. Rosamond Lake (within Edwards Air Force Base property) is a dry lakebed located approximately 10.0 miles to the northeast. Lake Palmdale and Lake Elizabeth are located 11.5 miles to the southeast and 9.0 miles to the southwest of the site, respectively. The Little Rock Reservoir and Dam are located approximately 19.0 miles to the southeast of the site in the Angeles National Forest. Any potential seiche on these water bodies would not affect the site due to their downstream location or distance from the site.

Tsunamis are tidal waves generated by fault displacement or major ground movement. Tsunami hazards are not present in the City of Lancaster or the Antelope Valley due to elevation and distance from the Pacific Ocean (i.e., over 45 miles). The site is located outside the tsunami inundation areas, as identified in the Los Angeles County Tsunami Inundation Maps prepared by the California Emergency Management Agency (CalEMA 2009). The Project would not be exposed to tsunami hazards.

The Project site is not located near an ocean, mountain, or hill (CDOC 2014); therefore, tsunami or mudslide hazards are not expected to affect the Project. The site is relatively flat and the nearest hillside area is located 4.75 miles southwest of the site, at Ritter Ridge. Mudflows from the adjacent hills and mountains would not affect the site due to distance and the presence of intervening structures. No impacts would occur and no mitigation is required.

4.8.7 CUMULATIVE IMPACTS

Cumulative hydrology and water quality impacts are considered within the Rosamond Lake Watershed, where the site is located.

Water Quality

Future growth and development in the Antelope Valley in the Rosamond Lake Watershed (which includes the City of Lancaster and the Project site) would generate new sources of urban pollutants that could degrade water quality in surface water bodies and in the groundwater. However, construction activities on sites of one acre or more are required to implement BMPs listed in individual SWPPPs, which are required under the NPDES Construction General Permit (RR HYD-1).

The CalGreen Code (which has been adopted by the City of Lancaster and the County) also requires SWPPPs for projects on sites less than one acre (PDF HYD-1). Compliance with these regulations would prevent short-term construction activities from resulting in significant water quality impacts from the Project and other projects in the same watershed.

The Lahontan RWQCB has issued WDRs that impose regulations for storm water discharges from individual developments that may lead to pollutant discharges into the storm drain system or surface water bodies. These regulations implement the Basin Plan for the Lahontan region and help meet the established water quality objectives for both groundwater and surface water bodies. Compliance with the WDRs would prevent violation of water quality standards. The Project will be constructed and operated in accordance with the National Pollutant Discharge Elimination System (NPDES) General Permit for Storm Water Discharges from Small Municipal Separate Storm Sewer Systems (MS4), Order No 2013-0001-DWQ, NPDES No. CAS000004 (or the latest approved MS4 General Permit). Compliance requires controls to reduce pollutants from the MS4 to the maximum extent practicable (MEP). The MEP standard requires Permittees to apply Best Management Practices (BMPs) that are effective in reducing or eliminating the discharge of pollutants to the waters of the U.S., and emphasizes pollutant reduction and source control BMPs to prevent pollutants from entering storm water runoff.

With the implementation of treatment-control and source-control BMPs by the Project, and with compliance by the cumulative projects with applicable Lahontan RWQCB's WDRs for storm water discharges, future growth and development within the Rosamond Lake Watershed would not increase pollutant loads in storm water runoff such that a violation of water quality standards would occur. Cumulative adverse impacts related to water quality would be less than significant. No mitigation is required.

Groundwater

Increases in the resident population and intensity of development in the Rosamond Lake Watershed would translate to a greater demand for water. Due to overdrafting of the Antelope Valley Groundwater Basin, the increase in groundwater pumping could lead to adverse impacts on the groundwater. An adjudication process is currently underway to protect local groundwater resources. An increase used in imported water and recycled water and in water conservation measures would be necessary to reduce impacts on the local groundwater. Also, implementation of the final resolution of the adjudication would maintain pumping levels within the limits of the safe yield of the Antelope Valley Groundwater Basin and prevent adverse impacts to the Basin.

As the Project does not propose the use of groundwater supplies for its long-term operations, it would not contribute to the use or depletion of local groundwater supplies. No cumulative impact on groundwater resources would occur with the Project.

Hydrology and Storm Drainage

Future growth and development in the Rosamond Lake Watershed would increase impermeable surfaces and decrease water percolation areas. Increase in impervious surfaces could increase storm water volumes and flow rates in local and regional drainage channels. However, new development and major redevelopment projects are subject to the CalGreen Code and, if located within the City of Lancaster, the City's Drainage Regulations (Chapter 13.04 of the Lancaster Municipal Code). Compliance with these regulations would reduce storm drain capacity impacts and would prevent flood hazards. Cumulative projects proposed in the City of Lancaster and in designated flood hazard areas would also need to comply with flood-control regulations in the City's Zoning and Building Code (Titles 15 and 17 of the City's Municipal Code) to reduce the potential hazards to life and property from flood events. Therefore, no cumulative adverse impacts related to flood hazards or inadequate storm drainage would occur with compliance with existing regulations. No mitigation is required.

Dam and Reservoir Facilities

Apollo Lake, Lake Palmdale, Lake Little Rock Reservoir and Dam, Fairmont Reservoir and Dam, and other open bodies of water in the Antelope Valley pose inundation hazards to the area in the event of dam failure. Failure of any of these dams and facilities could affect existing and future developments within identified inundation areas in the Rosamond Lake Watershed. The potential for property damage and personal injury is decreased by the construction of dams in accordance with State and federal dam safety regulations and the preparation of the required emergency action plans for individual dams, which include warning, evacuation, and post-disaster actions. Cumulative impacts from dam inundation would be less than significant.

Future development in the Antelope Valley would not be exposed to tsunami hazards. Seiche hazards would affect local areas adjacent to an open water body or reservoir and would not create cumulative impacts. Future development on steep hillside areas in Ritter Ridge and the San Gabriel Mountains may be exposed to potential mudflow hazards. Compliance with hillside management guidelines would prevent mudflow hazards. Therefore, cumulative adverse impacts related to dam inundation, tsunami, seiches, and mudflows would be less than significant. No mitigation is required.

4.8.8 MITIGATION MEASURES

With implementation of PDF HYD-1 and PDF HYD-2 and compliance with existing regulations (RR HYD-1 through RR HYD-2), no significant adverse impacts related to hydrology and water quality would occur. Therefore, no mitigation measures are required.

4.8.9 LEVEL OF SIGNIFICANCE AFTER MITIGATION

Direct, indirect and cumulative impacts related to hydrology and water quality would be less than significant with compliance with existing regulations.

4.8.10 REFERENCES

California Department of Conservation (CDOC), 2014 (June 26, date accessed). 2010 Geologic Map of California. Sacramento, CA: CDOC. <http://www.quake.ca.gov/gmaps/GMC/stategeologicmap.html>.

California Department of Water Resources (DWR). 2004 (February 27). *California's Groundwater Bulletin 118 – Antelope Valley Groundwater Basin*. Sacramento, CA: DWR.

- California Emergency Management Agency (CalEMA). 2009 (March 1). *Tsunami Inundation Map For Emergency Planning – Beverly Hills Quadrangle*. Sacramento, CA: CalEMA.
- Converse Consultants. 2014 (June). *Geohazard Study Report – Mira Loma Detention Center*. Monrovia, CA: Converse.
- Federal Emergency Management Agency (FEMA). 2008 (September 26). Flood Insurance Rate Map – Map No. 06037C0405F. Washington, D.C.: FEMA.
- Lahontan Regional Water Quality Control Board (Lahontan RWQCB). 1995 (as amended). *Water Quality Control Plan for the Lahontan Region – North and South Basins*. South Lake Tahoe and Victorville, CA: Lahontan RWQCB.
- Lancaster, City of. 2015 (May, last updated). *Lancaster, California – Code of Ordinances*. Tallahassee, FL: Municode Corporation for the City. https://www.municode.com/library/ca/lancaster/codes/code_of_ordinances?nodeId=16042.
- . 2013 (September 4, adopted). *2013 City of Lancaster Hazard Mitigation Plan*. Lancaster, CA: the City.
- . 2010. *Emergency Operations Plan 2010*. Lancaster, CA: the City.
- Los Angeles, County of. 2015. *Los Angeles County, California Code of Ordinances*. Tallahassee, FL: Municode Corporation for the County. <http://library.municode.com/index.aspx?clientId=16274>.
- . 2014. *MLDF-Water Usage 2009–2012*. Los Angeles, CA: the County.
- Los Angeles County Department of Regional Planning (LACDRP). 2014 (January). *Los Angeles County General Plan 2035*. Los Angeles, CA: the County. <http://planning.lacounty.gov/generalplan/draft2014>.
- . 1990. *Safety Element – Los Angeles County General Plan*. Los Angeles, CA: the County. <http://planning.lacounty.gov/generalplan/existing>
- Los Angeles, County of, Water Works District 40 (WWD 40). 2015 (March 3). Personal communication. Meeting included D. Rydman and R. Gindi of WWD 40; H. Parker of the County Chief Executive Office and K. Starbird of BonTerra Psomas.
- Psomas. 2015a (May). *Evaluation Report of Sanitary and Stormwater Utilities – Mira Loma Women's Detention Center, Lancaster, CA (Proposal No. 15-0223-SC)*. Santa Clarita, CA: Psomas.
- . 2015b (May). *Mira Loma Women's Detention Center Facility Water Supply Assessment*. Santa Ana, CA: Psomas.
- . 2013 (September). *Report on Evaluation of Two Existing Wells at the Mira Loma Detention Facility, Lancaster, California*. Los Angeles, CA: Psomas.
- Regional Water Management Group (RWMG). 2013. *Antelope Valley Integrated Regional Water Management Plan – Final, 2013 Update*. <http://www.avwaterplan.org/>.

Regional Water Quality Control Board, Los Angeles Region (LARWQCB). 2012 (November 8). Order No. R4-2012-0175 NPDES Permit No. CAS004001 Waste Discharge Requirements For Municipal Separate Storm Sewer System (Ms4) Discharges Within The Coastal Watersheds Of Los Angeles County, Except Those Discharges Originating From The City Of Long Beach. Monterey Park, CA: LARWQCB. http://www.waterboards.ca.gov/losangeles/water_issues/programs/stormwater/municipal/la_ms4/2012/Order%20R4-2012-0175%20-%20A%20Final%20Order%20revised.pdf.

———. 1995 (February 23, as approved). *Water Quality Control Plan, Los Angeles Region: Basin Plan for the Coastal Watershed of Los Angeles and Ventura Counties*. Monterey Park, CA: LARWQCB.

State Water Resources Control Board (SWRCB). 2013 (February). State Water Resources Control Board Water Quality Order No. 2013-0001-DWQ National Pollutant Discharge Elimination System (NPDES) General Permit No. CAS000004 Waste Discharge Requirements (WDRs) For Storm Water Discharges From Small Municipal Separate Storm Sewer Systems (MS4s) (General Permit). Sacramento, CA: SWRCB.

———. 2011 (October 11). Final 2010 Integrated Report (CWA Section 3030(d) List/305(b) Report). Sacramento, CA: SWRCB.

VCA Engineers. 2015 (January). *County of Los Angeles Mira Loma Detention Center Preliminary Site Water Supply and Distribution Analysis Narrative*. Los Angeles, CA: VCA.

———. 2014 (August). *County of Los Angeles Mira Loma Detention Center, Hydraulics/Hydrology and Site Storm Drainage System*. Los Angeles, CA: VCA Engineers.

4.9 LAND USE AND PLANNING

This section describes the current and planned land uses in and near the proposed Mira Loma Women's Detention Center (MLWDC) and addresses potential land use impacts that could result from implementation of the proposed Project on a portion of the Mira Loma Detention Center (MLDC) property. Information presented in this section is based on field reconnaissance, review of aerial photographs, and review of relevant planning documents as identified herein. The Project's consistency with applicable land use designations, zoning, and policies is assessed through review of the land use goals and policies contained in the Lancaster General Plan and other related planning programs, including the Southern California Association of Governments' (SCAG's) regional plans.

The Project site is located in the City of Lancaster, but the property is owned by the County and, thus, is not subject to the City of Lancaster's land use regulations. At the same time, the Project site is not specifically addressed by the County General Plan as it is located within the City limits. Therefore, there are no adopted land use plans that are applicable to the Project site. However, this section will evaluate the project's consistency with County plan policies and also, as part of the inter-jurisdictional consultation process required in Section 65402 of the *California Government Code*, this EIR section addresses the Project's consistency with City of Lancaster land use plans and policies.

4.9.1 RELEVANT PROGRAMS AND REGULATIONS

State

California Government Code

Section 65402 of the *California Government Code* states that, if a city general plan has been adopted, a County cannot authorize or construct a building within the corporate limits of the city until the city's planning agency has received and reported upon the project's conformity with the city's general plan. The planning agency has 40 days to report on the conformity with the general plan and failure to timely respond becomes a conclusive determination that the project conforms to the city general plan.

Senate Bill SB 375

Senate Bill (SB) 375, signed by California Governor Schwarzenegger on September 30, 2008, provides a planning process that coordinates land use planning, regional transportation plans, and funding priorities in order to help California meet greenhouse gas (GHG) reduction goals established in Assembly Bill (AB) 32 (discussed in detail in Section 4.6, Greenhouse Gas Emissions). SB 375 requires regional transportation plans, developed by Metropolitan Planning Organizations (MPOs) like SCAG, to incorporate a "sustainable communities strategy" (SCS) in its regional transportation plan (RTP). The SCS is intended to demonstrate how the coordination of land use and transportation planning efforts may achieve GHG emissions reduction targets set by AB 32. If an SCS cannot achieve the GHG emissions target, the MPO is required to adopt an "alternative planning scenario" (APS) that will demonstrate what would need to be done to achieve the GHG emissions reduction target and to define the barriers to accomplishing the reduction.

Regional

Southern California Association of Governments Plans

SCAG is the MPO for the Counties of Los Angeles, Orange, San Bernardino, Riverside, Ventura, and Imperial. This region encompasses a population exceeding 18 million persons in an area of more than 38,000 square miles. SCAG divides Los Angeles County into nine SCAG subregions, and the Project site is located in the North Los Angeles County subregion. As the designated MPO, SCAG is mandated by the federal government to develop plans for transportation, growth management, hazardous waste management, and air quality. SCAG's organizational responsibilities include (SCAG 2015):

- Maintain a continuous, comprehensive, and coordinated planning process (the "3 Cs") resulting in a Regional Transportation Plan (RTP) and a Federal Transportation Improvement Program (FTIP)
- Develop a Sustainable Communities Strategy (SCS) to address greenhouse gas emissions as an element of the RTP
- Develop demographic projections
- Develop integrated land use, housing, employment, transportation programs and strategies for the South Coast Air Quality Management Plan
- Co-lead agency for air quality planning in the Central Coast and Southeast Desert air basin districts
- Responsible for developing and ensuring that the Regional Transportation Plan and the Federal Transportation Improvement Program conform to the purposes of the State Implementation Plans for specific transportation-related criteria pollutants, per the Clean Air Act
- Authorized regional agency for intergovernmental review of proposed programs for federal financial assistance and direct development activities
- Review environmental impact reports for projects having regional significance to ensure they are in line with approved regional plans
- Develop an area-wide, waste treatment management plan
- Responsible for preparation of the Regional Housing Needs Assessment
- Along with the San Diego Association of Governments and the Santa Barbara County/Cities Area Planning Council, SCAG is responsible for preparing the Southern California Hazardous Waste Management Plan

SCAG has developed a number of plans to achieve regional objectives, and applicable plans are discussed below.

Regional Comprehensive Plan

SCAG developed the Regional Comprehensive Plan (RCP) to address the Southern California region's challenges related to land use and housing, open space and habitat, water, energy, air quality, solid waste, transportation, security and emergency preparedness, and the economy. The RCP vision seeks to improve the mobility of all residents through an efficient transportation system; to foster livability in safe and healthy communities; to enable prosperity for all people by promoting economic vitality through job training and education; and to promote sustainability for

future generations by promoting responsible development and growth that uses natural resources efficiently.

The RCP includes goals, outcomes, and an action plan of policies and initiatives that may be used by SCAG, State and local governments, transportation commissions, resource agencies and conservation groups, the private sector, and the general public in the following endeavors (SCAG 2008):

- Developing long-range regional plans and strategies that provide for efficient movement of people, goods and information; enhance economic growth and international trade; and improve the environment and quality of life.
- Providing quality information services and analysis for the region.
- Using an inclusive decision-making process that resolves conflicts and encourages trust.
- Creating an educational and work environment that cultivates creativity, initiative, and opportunity.

Regional Housing Needs Assessment

SCAG's Regional Housing Needs Assessment (RHNA) provides an allocation of the existing and future housing needs by jurisdiction, which is based on income level; existing housing needs within each city and county; and the fair share allocation of the projected regional population growth. The RHNA is used for land use planning; developing local housing programs; prioritizing local resource allocation; addressing identified existing housing deficiencies; and accommodating future housing needs resulting from population, employment, and household growth. The RHNA shows that the City of Lancaster has a future housing need of 2,510 new dwelling units (SCAG 2014a) and an existing housing need of 7,642 units for households that are using 40 percent or more of their household income for rental payments (6,940 households) and for households living in units without kitchen or plumbing facilities (702 households) (SCAG 2014b).

Regional Transportation Plan/Sustainable Communities Strategy

The Regional Transportation Plan (RTP) is a long-range transportation plan that is developed and updated by SCAG every four years to guide transportation investments throughout the region. The Sustainable Communities Strategy (SCS) is a required element of the RTP that integrates land use and transportation strategies to achieve California Air Resources Board (CARB) emissions reduction targets pursuant to Senate Bill (SB) 375.

In the past, SCAG prepared the Regional Transportation Plan with an emphasis on mobility. However, the current *2012–2035 Regional Transportation Plan/Sustainable Communities Strategy* (RTP/SCS) places greater importance on sustainability. The RTP/SCS does not exclude mobility as its primary goal, but has created a vision that incorporates new solutions that focus more on the region's future needs for "mobility, economy, and sustainability" (SCAG 2012b).

One of the RTP/SCS's commitments toward a "sustainable future" is to reduce the amount of emissions produced from transportation sources through the operation of low or no emission transportation systems by 2035. The benefits of this strategy will ensure "energy security, increased public support for infrastructure, GHG reduction, and economic development" (SCAG 2012b). The RTP/SCS also focuses on the economy with expectations of shortening the gap between the regional transportation system and economic vitality.

To address the mobility challenge of the region's continuing roadway congestion, transportation investments will be made in transit; passenger and high-speed rail; active transportation; transportation demand management; transportation systems management; highways; arterials; goods movement; aviation and airport ground access; and operations and maintenance projects. These will indirectly create investment opportunities in the region. The RTP/SCS also seeks to reduce GHG emissions by 16 percent in 2035; to create closer "high quality" transit for households; to decrease roadway congestion; to improve safety; and to generate over 500,000 jobs per year. This will improve and establish a platform for sustainable living situations for the region's existing and future population (SCAG 2012b). The Federal Transportation Improvement Project (FTIP) is a prioritized list of transportation projects that implement the RTP/SCS.

County

County of Los Angeles General Plan

The County of Los Angeles Board of Supervisors approved the General Plan Update in March 2015. The General Plan 2035 serves as the land use policy for the unincorporated areas of Los Angeles County and was developed in accordance with five guiding principles: smart growth; sufficient community services and infrastructure; strong and diverse economy; excellent environmental resource management; and healthy, livable and equitable communities. The General Plan discusses the Antelope Valley Planning Area and its opportunity areas, consisting of rural town centers and areas with opportunities for economic growth and development. The Elements of the General Plan discuss issues affecting the County and outline goals, policies, and implementation programs that address the needs of the County and achieve its long range vision for growth and development.

Antelope Valley Area Plan

The *Antelope Valley Area Plan* (AVAP) was adopted in June 2015 and is a component of the *Los Angeles County General Plan* and applies to the unincorporated area of the Antelope Valley, which covers a geographic area of 1,800 square miles or 44 percent of the total County land area. This area surrounds the cities of Lancaster and Palmdale and is bound by the San Bernardino County line to the east, the Ventura County line to the west, the Kern County line to the north and the Angeles National Forest (inclusive) to the south. It provides more specific goals and policies for unincorporated County land in the Antelope Valley area than the County General Plan. The AVAP does not include the Project site, as the site is located within the City of Lancaster. Thus, the AVAP has no land use designation for the site. (LACDRP 2015b).

City

Lancaster General Plan

The City of Lancaster's *General Plan 2030* regulates land use and development in the City of Lancaster. It includes the City's goals, objectives, policies, and actions for the natural environment, public health and safety, active living, physical mobility, municipal services and facilities, economic development and vitality, and physical development. The General Plan Land Use Map shows the land use designation for the Project site is Public Use – Public (P). Areas designated as Public include lands in public ownership, including governmental administration and service facilities, with a maximum allowable floor area ratio of 1.0. Permitted land uses also include public schools and educational institutions. As stated above, the Project site is owned by the County and, thus, is not subject to the City of Lancaster's land use regulations.

Lancaster Zoning Ordinance

The Lancaster Zoning Ordinance is contained in Title 17 of the Lancaster Municipal Code. The Project site is zoned P (Public Use) in the Lancaster Zoning Map. The purpose of the Public Use zone is “to allow the development of public facilities and uses in order to provide a full range of urban services” in the City (Lancaster 2015). Permitted uses include airports, animal shelters, flood control and drainage facilities, maintenance yards, government offices, prisons, sewage treatment plants, water reservoirs, dams, treatment plans and other similar uses. As stated above, the Project site is owned by the County and, thus, is not subject to the City of Lancaster’s land use regulations.

4.9.2 EXISTING CONDITIONS

The 46-acre Project site is located on a 620-acre block of County and State-owned properties bordered by West Avenue I, 50th Street West, West Avenue J, and 60th Street West. The Project would be developed on portions of the existing Mira Loma Detention Center.

On-Site Land Uses

Section 2.0 of this EIR discusses the existing environmental setting. Exhibit 2-2, Aerial Photograph of Land Uses, provides an aerial view of the Project site and surrounding areas. Exhibit 2-3, Existing MLDC Facilities, shows existing structures on the site, which include a number of administrative, programming, barracks, and maintenance buildings associated with the MLDC and its most recent use as a U.S. Immigration and Customs Enforcement (ICE) Detention Center. As the Mira Loma Detention Center is currently not occupied by inmates or serving any detention functions, most of the buildings are unoccupied.

While the County owns the Project site, the property is located within the jurisdictional boundaries of the City of Lancaster. Thus, the County General Plan does not have a land use designation or zoning for the site. As shown on Exhibit 4.9-1, City of Lancaster General Plan Land Use Designation, the Project site is designated by the City of Lancaster as Public in its Land Use Map. As shown on Exhibit 4.9-2, City of Lancaster General Plan Land Use Designation, it is zoned as Public Use in the Lancaster Zoning Map.

Surrounding Off-Site Land Uses

Land Uses to the North

The area located immediately to the north and northwest of the Project site includes ancillary facilities that are part of the MLDC, but are outside of the primary secured area and outside the Project site boundary. Many of the buildings found in this area are associated with the military airfield uses that previously operated as part of the Polaris Flight Academy, including the Silver Bullet theater; the A, B, C, and D barracks; hangars; the old side canteen, and a school. The uses of these various buildings have changed over the years, but all of them are currently vacant or used for storage. This area has a Lancaster General Plan designation of Public Use (P) and is zoned as Public (P). Farther north of West Avenue I is largely vacant and undeveloped, with the exception of a few single-family residential homes. This area has a Lancaster General Plan designation of Light Industrial (LI) and Non-Urban Residential (NU) and is zoned as Light Industrial (LI) and Rural Residential – 2.5 (RR-2.5).

D:\Projects\COLACEO\001\Graphics\EIR\Ex_Zoning_20151023.ai

Legend

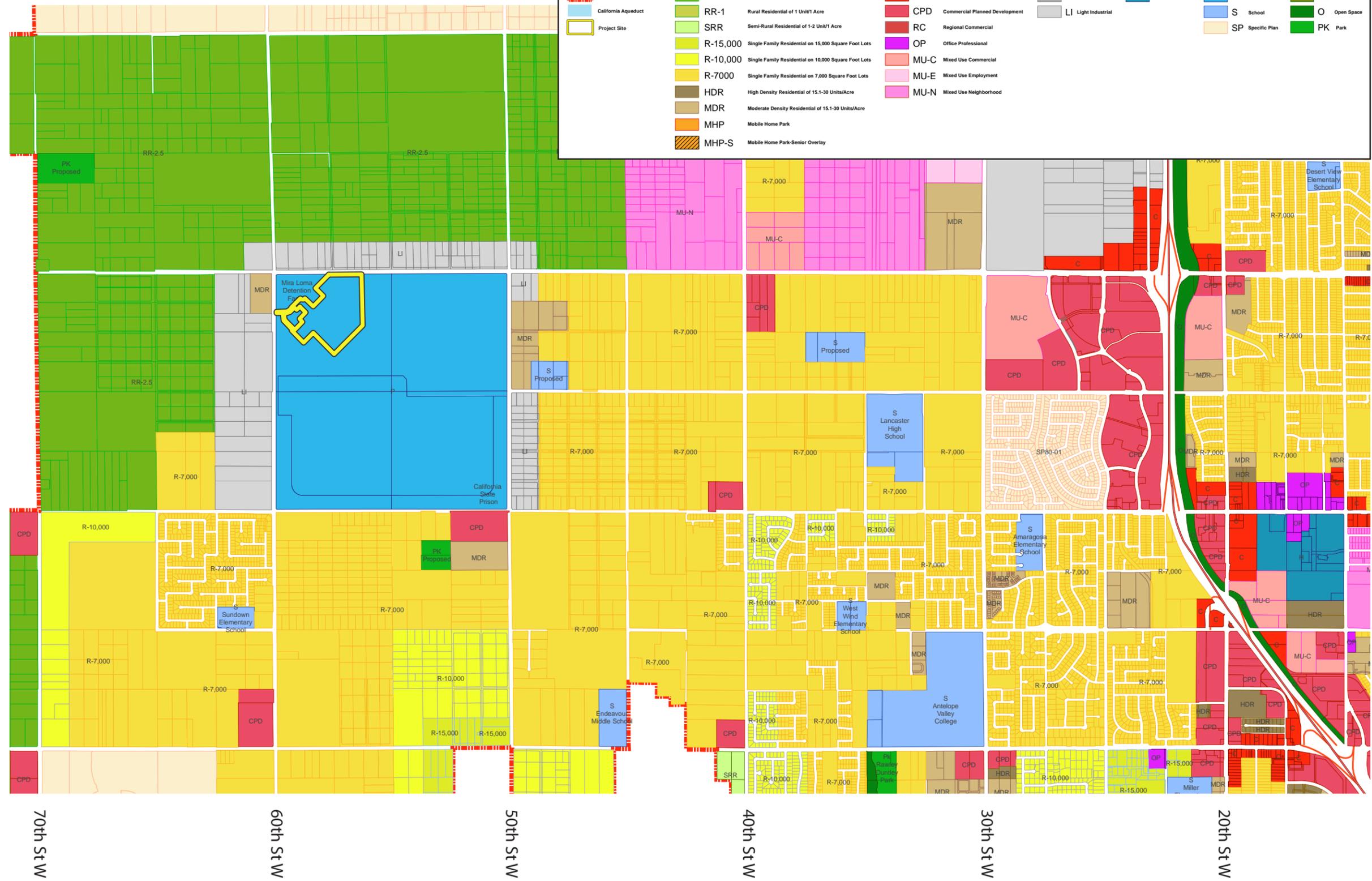
City Limits	RR-2.5 Rural Residential of 1 Unit/2.5 Acres	C Commercial	HI Heavy Industrial	H Health Care	P Health Care	CE Cemetery
California Aqueduct	RR-1 Rural Residential of 1 Unit/1 Acre	CPD Commercial Planned Development	LI Light Industrial	S School	S School	O Open Space
Project Site	SRR Semi-Rural Residential of 1-2 Units/1 Acre	RC Regional Commercial		SP Specific Plan	SP Specific Plan	PK Park
	R-15,000 Single Family Residential on 15,000 Square Foot Lots	OP Office Professional				
	R-10,000 Single Family Residential on 10,000 Square Foot Lots	MU-C Mixed Use Commercial				
	R-7,000 Single Family Residential on 7,000 Square Foot Lots	MU-E Mixed Use Employment				
	HDR High Density Residential of 15.1-30 Units/Acre	MU-N Mixed Use Neighborhood				
	MDR Moderate Density Residential of 15.1-30 Units/Acre					
	MHP Mobile Home Park					
	MHP-S Mobile Home Park-Senior Overlay					

Avenue H

Avenue I

Avenue J

Avenue K

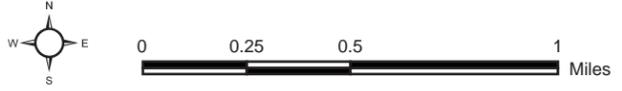


Source: City of Lancaster 2011

City of Lancaster Zoning

Exhibit 4.9-2

Mira Loma Women's Detention Center



Land Uses to the East

The County's solar energy facility is located immediately to the east of the MLDC and can generate up to two megawatts (MW) of solar energy to off-set the electrical demand generated by adjacent County facilities. The County of Los Angeles Department of Animal Care and Control – Lancaster Shelter is located approximately 0.36 mile east of the Project site, and the County Probation Department's Challenger Memorial Youth Center (CMYC) is approximately 0.17 mile east of the Project site. This area has a Lancaster General Plan designation of Public Use (P) and zoned as Public (P). Further east across 50th Street West is largely vacant and undeveloped, with the exception of a few single-family residential homes along West Avenue I. This area has a Lancaster General Plan designation of LI and Multi-Residential (MR1) and zoned as LI and Medium Density Residential (MDR).

Land Uses to the South

The County's former High Desert Health System Multi-Ambulatory Care Center (HDHS MACC) is located directly southwest of the Project site and was an outpatient medical services facility that relocated to the intersection of East Avenue I and 5th Street East in Lancaster. Medical and health services have largely been transitioned out of the existing HDHS MACC facility, and it is now largely vacant with mostly unoccupied buildings. The California State Prison, Los Angeles County (CSP-LAC) is owned and operated by the State of California and is located on the southern 262 acres of the 620-acre block. The State Prison has a Lancaster General Plan designation of Public Use (P) and zoned as Public (P). The land south of West Avenue J consists of residential subdivision developments at 60th Street West and 52nd Street West, as well as undeveloped vacant land. This area has a Lancaster General Plan designation of Urban Residential (UR) and is zoned as Single-Family Residential – 7000 (R-7,000).

Land Uses to the West

As discussed above, the area located to the west and northwest of the Project site includes ancillary facilities that are technically part of the MLDC, but are outside the primary secured area and outside the Project site boundary. Many of the buildings found in this area are associated with the military airfield uses that previously operated as part of the Polaris Flight Academy, including maintenance warehouses and storage areas; water tanks and pump houses; the fueling island; parking lots and roadways; and other structures at the western section of the MLDC.

The western edge of the block, which includes the primary ingress/egress to the Project site, runs along 60th Street West. The land west of 60th Street West is largely vacant and undeveloped, with the exception of a small apartment complex located to the west of the Project site. This area has a Lancaster General Plan designation of LI and MR1 and is zoned as LI and MDR. The nearest residential use is approximately 65 feet from the anticipated construction of the access/entrance to the Project site and approximately 0.15 mile from the proposed operations and buildings internal to the Project site.

4.9.3 THRESHOLDS OF SIGNIFICANCE

The following significance criteria are derived from the Environmental Checklist in Appendix G of the State CEQA Guidelines. A project would result in a significant adverse impact related to Land Use and Planning if it would:

Threshold 4.9a: Physically divide an established community.

Threshold 4.9b: Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating and environmental effect.

Threshold 4.9c: Conflict with any applicable habitat conservation plan or natural community conservation plan?

4.9.4 ENVIRONMENTAL IMPACT ANALYSIS

Threshold 4.9a Would the project physically divide an established community?

Short-Term and Long-Term Impacts

There are no residential uses on the Project site, and there are no established communities near the site that would be divided by the Project. As shown in the aerial photograph provided in Exhibit 2-2 and described in Section 2.2, Local Setting, the Project would be developed in the northwest corner of the County-owned property within the existing MLDC facility. The nearest residential use is a small apartment complex across 60th Street West. The Project would not alter these residences.

East of the Project site are the youth detained at the CYMC, and to the south of the site are the inmates at the CSP-LAC. These are both public facilities that include the same zoning and land use designation as the Project site, and neither facility would be altered by Project implementation. Land to the north is largely vacant and undeveloped, with the exception of a few single-family residential homes. The Project would not alter these residences or create physical obstructions or barriers to the community.

While the City of Lancaster is a mid-sized city in Los Angeles County, the MLDC was built on the site before significant growth occurred in the City and in the Antelope Valley. The site operated as a detention facility by various agencies from 1945 through 2012. When considered in the context of the past uses of the Project site, the proposed reuse of the MLDC property as a detention center is not an introduction of a new land use into the area. The detainee population of low- to medium-security-level female inmates, housed in an education, treatment, vocational training-based facility that has a campus character, would not create a land use conflict with the surrounding rural residential community.

The reuse of portions of the MLDC would not conflict with other existing public facilities on the 620-acre block, including the CYMC and the CSP-LAC. Therefore, the long-term operation of the Project is not anticipated to alter the community in this portion of western Lancaster and would not disrupt the physical arrangement of an established community. No impact would occur and no mitigation is required.

Threshold 4.9b: Would the project conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating and environmental effect?

Short-Term and Long-Term Impacts

The Project site is located in the City of Lancaster, but the property is owned by the County and, thus, is not subject to the City of Lancaster's land use regulations. At the same time, the Project

site is not specifically addressed by the County General Plan as it is located within the Lancaster City limits. Therefore, there are no adopted land use plans that are applicable to the Project site. However, consistent with the consultation process in Section 65402 of the *California Government Code*, this EIR section addresses the Project's consistency with the City of Lancaster's land use plans and policies.

Lancaster General Plan 2030

The Project site is located in the City of Lancaster, and the City's General Plan 2030 sets land use policies for all land in the City. The General Plan consists of eight sections that include the following components: Plan for Natural Environment, Plan for Public Health and Safety, Plan for Active Living, Plan for Physical Mobility, Plan for Physical Development, Plan for Economic Development, Plan for Municipal Services and Facilities, and Housing Element. Consistency with relevant goals, objectives, and policies in the General Plan 2030 is provided in Table 4.9-1. Importantly, while there are specific actions listed under each policy, these actions would be implemented by the City of Lancaster, and the County of Los Angeles has no authority, responsibility, or control over them. Thus, no consistency analysis is provided for specific actions listed in the Lancaster General Plan 2030.

**TABLE 4.9-1
LANCASTER GENERAL PLAN CONSISTENCY**

General Plan Goal/Objective/Policy	Project Consistency
<p>OBJECTIVE 3.1 Protect, maintain, and replenish groundwater supplies to meet present and future urban and rural needs.</p> <p>Policy 3.1.1: Ensure that development does not adversely affect the groundwater basin.</p>	<p>Consistent: The Project would have less than significant impacts on groundwater resources with incorporation of Best Management Practices (BMPs) and Low Impact Development (LID) standards, as discussed in Section 4.8, Hydrology and Water Quality. Project operation would not utilize the groundwater wells on the Project site, and water service would be provided via County Waterworks District 40. A Water Supply Assessment was prepared for the Project and is summarized in Section 4.14, Utilities and Service Systems.</p>
<p>Policy 3.2.1: Promote the use of water conservation measures in the landscape plans of new developments.</p>	<p>Consistent: The Project would comply with the California Green Building Standards Code (CalGreen Code) and the County's Drought Tolerant Landscaping requirements, which include water conservation measures for landscaping, as discussed in Section 4.6, Greenhouse Gas.</p>
<p>Policy 3.2.2: Consider the potential impact of new development projects on the existing water supply.</p>	<p>Consistent: The Project would have less than significant impacts on groundwater resources with incorporation of BMPs and LID standards, as discussed in Section 4.8, Hydrology and Water Quality. Project operation would not utilize the groundwater wells on the Project site, and water service would be provided via County Waterworks District 40. The existing Central Plant, which is cooled by water, would be decommissioned. A Water Supply Assessment was prepared for the Project and is summarized in Section 4.14, Utilities and Service Systems.</p>
<p>Policy 3.2.3: Encourage incorporation of water-saving design measures into existing developments.</p>	<p>Consistent: The Project would comply with the CalGreen Code and the County's Drought Tolerant Landscaping requirements, which include water conservation measures for landscaping, as discussed in Section 4.6, Greenhouse Gas.</p>
<p>Policy 3.2.5: Promote the use of water conservation measures in the design of new developments.</p>	

**TABLE 4.9-1
LANCASTER GENERAL PLAN CONSISTENCY**

General Plan Goal/Objective/Policy	Project Consistency
Policy 3.3.1: Minimize the amount of vehicular miles traveled.	Consistent: The Project would substantially increase the number of video visiting stations available to inmates when compared to current operations at the Century Regional Detention Facility (CRDF), which would increase opportunities for visitation without vehicular travel. The Project would include an Employee Commute Reduction Plan (ECRP), commonly known as the Rideshare Plan, in accordance with the Los Angeles County Code (Chapter 5.9, Vehicle Trip Reduction), as discussed in Section 4.6, Greenhouse Gas.
Policy 3.3.3: Minimize air pollutant emissions generated by new and existing development.	Consistent: The Project would have less than significant impacts to air quality through compliance with applicable Antelope Valley Air Quality Management District (AVAQMD) Rules. Potential exposure of on-site construction workers to Valley Fever spores due to disturbance of soils would be less than significant with mitigation, as discussed in Section 4.2, Air Quality.
Policy 3.3.4: Protect sensitive uses such as homes, schools and medical facilities, from the impacts of air pollution.	
Policy 3.3.5: Cooperate with the AVAQMD and other agencies to protect air quality in the Antelope Valley.	
Policy 3.4.4: Ensure that development proposals, including City sponsored projects, are analyzed for short- and long-term impacts to biological resources and that appropriate mitigation measures are implemented.	Consistent: Section 4.3, Biological Resources, analyzes Project impacts on sensitive biological resources, and mitigation has been developed to reduce impacts to nesting birds and roosting bats to levels less than significant.
Policy 3.5.1: Minimize erosion problems resulting from development activities.	Consistent: The Project would have less than significant impacts on erosion with incorporation of BMPs and geotechnical requirements, as discussed in Section 4.8, Hydrology and Water Quality, and 4.5, Geology and Soils.
Policy 3.5.2: Since certain soils in the Lancaster study area have exhibited shrink-swell behavior and a potential for fissuring, and subsidence may exist in other areas, minimize the potential for damage resulting from the occurrence of soils movement.	Consistent: Implementation of the recommendations of the geotechnical report would reduce impacts related to unstable soils, as discussed in Section 4.5, Geology and Soils.
<p>OBJECTIVE 3.6 Encourage efficient use of energy resources through the promotion of efficient land use patterns and the incorporation of energy conservation practices into new and existing development, and appropriate use of alternative energy.</p> <p>Policy 3.6.2: Encourage innovative building, site design, and orientation techniques which minimize energy use.</p> <p>Policy 3.6.3: Encourage the incorporation of energy conservation measures in existing and new structures.</p>	Consistent: The Project would redevelop an existing land use, thereby conserving open spaces and repurposing existing facilities. The Project would comply with the CalGreen Code, which includes energy conservation measures, as discussed in Section 4.6, Greenhouse Gas. The Project's electrical demand would be off-set by up to one MW of solar-generated energy by the County's adjacent solar energy facility, and buildings over 10,000 square feet would be constructed to achieve the equivalency of a Leadership in Energy and Environmental Design (LEED) certification.
Policy 3.6.6: Consider and promote the use of alternative energy such as wind energy and solar energy. (Note: Policy 15.2.1 considers the use of waste to energy cogeneration systems as an energy source.)	
<p>OBJECTIVE 4.1 Minimize the potential for loss of life, physical injury, property damage, and social disruption resulting from seismic ground shaking and other geologic events.</p>	

**TABLE 4.9-1
LANCASTER GENERAL PLAN CONSISTENCY**

General Plan Goal/Objective/Policy	Project Consistency
<p>Policy 4.1.1: Manage potential seismic hazards resulting from fault rupture and strong ground motion to facilitate rapid physical and economic recovery following an earthquake through the identification and recognition of potentially hazardous conditions and implementation of effective standards for seismic design of structures.</p>	<p>Consistent: The Project would comply with current building codes, including appropriate seismic design criteria. Implementation of the recommendations of the geotechnical report would also address the effects of seismically induced settlement, as discussed in Section 4.5, Geology and Soils.</p>
<p>Policy 4.3.1: Ensure that noise-sensitive land uses and noise generators are located and designed in such a manner that City noise objectives will be achieved.</p>	<p>Consistent: Short-term construction noise would be reduced to levels considered less than significant through mitigation, as discussed in Section 4.10, Noise. Permanent noise increases from long-term Project operations would not be perceptible and would not adversely affect nearby noise-sensitive land uses.</p>
<p>Policy 4.3.2: Wherever feasible, manage the generation of single event noise levels (SENL) from motor vehicles, trains, aircraft, commercial, industrial, construction, and other activities such that SENL levels are no greater than 15 dBA above the noise objectives included in the Plan for Public Health and Safety.</p>	<p>Consistent: Single noise events might exceed 15 dBA above noise objectives for residential land uses during short-term construction activities; however, mitigation is set forth to reduce these impacts. There are no long-term operational single noise events that would impact public health or safety.</p>
<p>Policy 4.4.2: Limit the uses surrounding airport facilities at Fox Field, Edwards Air Force Base, and Plant 42 to ensure their continued safe operation.</p>	<p>Consistent: As discussed in Section 4.7, Hazards and Hazardous Materials, the Project would not affect airport operations at the Fox Airfield or other airports in the region.</p>
<p>OBJECTIVE 4.5 Protect life and property from the potential detrimental effects (short and long term) of the creation, transportation, storage, treatment, and disposal of hazardous materials and wastes within the City of Lancaster.</p>	<p>Consistent: The Project would comply with existing regulations on the use, storage, transport and disposal of hazardous materials and wastes, as discussed in Section 4.7, Hazards and Hazardous Materials.</p>
<p>Policy 4.5.1: Ensure that activities within the City of Lancaster transport, use, store, and dispose of hazardous materials in a responsible manner which protects the public health and safety.</p>	
<p>Policy 4.6.2: Ensure that the design of new development discourages opportunities for criminal activities to the maximum extent possible.</p>	<p>Consistent: The Project would include physical and operational security measures to prevent criminal activities on the site, in accordance with Title 15 of the California Code of Regulations.</p>
<p>OBJECTIVE 4.7 Ensure that development occurs in a manner that minimizes the risk of structural and wildland fire.</p>	<p>Consistent: The Project would be constructed in accordance with the current County Fire Code to minimize the risk of structural fire, as discussed in Section 4.7, Hazards and Hazardous Materials.</p>
<p>Policy 4.7.2: Ensure that the design of new development minimizes the potential for fire.</p>	

**TABLE 4.9-1
LANCASTER GENERAL PLAN CONSISTENCY**

General Plan Goal/Objective/Policy	Project Consistency
<p>Goal 12 To promote community appreciation for the unique history of the Antelope Valley and the City of Lancaster and to promote community involvement in the protection, preservation, and restoration of the area's significant cultural, historical, or architectural features.</p> <p>OBJECTIVE 12.1 Identify and preserve and/or restore those features of cultural, historical, or architectural significance.</p> <p>Policy 12.1.1: Preserve features and sites of significant historical and cultural value consistent with their intrinsic and scientific values.</p>	<p>Consistent: The Project included a historic evaluation of the entire MLDC that identified the Polaris Flight Academy structures in the western portion of the MLDC as potentially eligible for listing in the NRHP and CRHR as a Historic District. The potentially eligible Historic District would not be adversely affected by the Project through avoidance of impacts to contributing structures, including the hangars, as discussed in Section 4.4, Cultural Resources. Mitigation for archaeological and paleontological resources are included to reduce impacts to levels considered less than significant.</p>
<p>Policy 14.3.1: Maintain an adequate supply of parking that will support the present level of automobiles and allow for the expected increase in alternative modes of transportation.</p>	<p>Consistent: The Project would be served by a Visitor Parking Lot, a Staff Parking Lot, and an Executive Parking Lot, which would accommodate the Project's parking demands, as discussed in Section 4.13, Transportation and Traffic. The Project would include an ECRP, in accordance with Los Angeles County Code (Chapter 5.9, Vehicle Trip Reduction), as discussed in Section 4.6, Greenhouse Gas.</p>
<p>Policy 14.3.2: Provide safe and convenient parking that has minimal impacts on the natural environment, the community image, and quality of life.</p>	<p>Consistent: Separate parking areas would be located near the visitor entrance and the staff entrances to ensure convenient and safe entry into the Project site.</p>
<p>Policy 15.1.2: Cooperate with local water agencies to provide an adequate water supply system to meet the standards for domestic and emergency needs.</p>	<p>Consistent: Project operations would eliminate the use of the groundwater wells on the Project site and would be provided water service via County Waterworks District 40. A separate potable water and fire water piping system would be developed on the Project site. A Water Supply Assessment was prepared for the Project and is summarized in Section 4.14, Utilities and Service Systems.</p>
<p>Policy 15.1.5: Ensure sufficient infrastructure is built and maintained to handle and treat wastewater discharge.</p>	<p>Consistent: The Los Angeles County Sanitation District (LACSD) has indicated that there is adequate capacity at the LACSD trunk sewer and treatment plant to serve the Project, as discussed in Section 4.14, Utilities and Service Systems.</p>
<p>Policy 16.1.1: Promote a jobs/housing balance that places an emphasis on the attraction of high-paying jobs which will enable the local workforce to achieve the standard of living necessary to both live and work within the community.</p>	<p>Consistent: The Project would require approximately 523 employees. These employees could be current LASD employees who live in the area and request a transfer or are all new employees not living in the Antelope Valley or Santa Clarita areas who would relocate to the area. Some inmate families may also relocate to the area but this is expected to be minimal. Vacant housing units in the City would accommodate the potential housing demand. New jobs would improve the City's jobs/housing balance, as discussed in Section 4.11, Population and Housing.</p>
<p>Policy 16.2.5: Encourage the attraction of public and quasi-public uses to locate in Lancaster.</p>	<p>Consistent: The Project is a public land use that would re-introduce jobs at the MLDC and into the Lancaster area.</p>
<p>Policy 16.6.2: Require new development to ensure that all new off-site capital improvements necessitated by their project are available, consistent with performance criteria identified in Objective 15.1.</p>	<p>Consistent: The Project is a public land use that would redevelop an existing facility. As discussed in Section 4.14, Utilities and Service Systems, new water pipeline infrastructure would be developed within West Avenue I to provide access to the County Waterworks District 40 water distribution system.</p>

**TABLE 4.9-1
LANCASTER GENERAL PLAN CONSISTENCY**

General Plan Goal/Objective/Policy	Project Consistency
Policy 19.2.3 Encourage the rehabilitation and revitalization of declining development, in a manner consistent with community design and development objectives.	Consistent: The Project would include the demolition of older structures and rehabilitation of other existing structures at the site, along with the construction of new structures to create an architecturally cohesive facility, as discussed in Section 4.1, Aesthetics.
OBJECTIVE 19.3 Improve the city's visual identity by utilizing design standards that instill a sense of pride and well-being in the community.	Consistent: As discussed in Section 4.1, Aesthetics, off-site improvements shall comply with the City's Design Guidelines. The Project included a historic evaluation of the entire MLDC that identified the Polaris Flight Academy structures in the western portion of the MLDC as potentially eligible for listing in the NRHP and CRHR as a Historic District. The potentially eligible Historic District would not be adversely affected by the Project through avoidance of impacts to contributing structures, including the hangars, as discussed in Section 4.4, Cultural Resources.
Policy 19.3.1 Promote high quality development by facilitating innovation in architecture/building design, site planning, streetscapes, and signage.	
Policy 19.3.4 Preserve and protect important areas of historic and cultural interest that serve as visible reminders of the City's social and architectural history.	
OBJECTIVE 20.1 Coordinate planning efforts and development decisions between Lancaster, Palmdale, Los Angeles County, Kern County, and San Bernardino County, including County unincorporated areas, regional, state and federal agencies and representative town councils.	Consistent: The planning and scope of the Project was coordinated with the City of Lancaster during the detention center's State Grant application process and the City has been consulted during the CEQA scoping process through the Notice of Preparation of a Draft Environmental Impact Report and Notice of Scoping Meeting and through the land use consultation on general plan consistency.
Policy 20.1.1: Promote harmonious and mutually beneficial uses of land between the City of Lancaster, the City of Palmdale, the Counties of Los Angeles, Kern and San Bernardino, and the United States Air Force (see also Policy 18.1.1 and related specific actions).	Consistent: The Project is consistent with the land use designation of the site in the Lancaster General Plan.
Source: Lancaster 2009a (Objectives and Policies).	

The City's General Plan also sets traffic levels of service (LOS) for various public facilities and services. The Project would not exceed LOS D during peak hours for streets (see Section 4.13, Transportation). The Project would also not exceed infrastructure and treatment capacity for water and wastewater systems, and adequate fire flows would be provided to serve the Project (see Section 4.14, Utilities and Service Systems). The Project would not be exposed to flood hazards, nor would it create flood hazards, as discussed in Section 4.8, Hydrology and Water Quality.

The Project would be a secured facility and would not have significant adverse effects on police, fire, or paramedic services. Also, it would have on-site facilities (e.g., classrooms, library, recreation room, and fields) and would not directly generate demand for off-site facilities. The Project would not exceed service levels for police protection, fire protection, paramedic services, parks and recreation, libraries, or schools (see Section 4.11, Public Services and Recreation). No conflict with Lancaster's General Plan 2030 would occur with implementation of the Project.

Lancaster Zoning Ordinance

The Project site is zoned P (Public Use) in the Lancaster Zoning Map. The purpose of the Public Use zone is "to allow the development of public facilities and uses in order to provide a full range

of urban services” in the City (Lancaster 2015). Permitted uses include airports, animal shelters, flood-control and drainage facilities, maintenance yards, government offices, prisons, sewage treatment plants, water reservoirs, dams, treatment plans and other similar uses. The Project is consistent with this City land use designation. No conflict with the Lancaster Zoning Ordinance would occur with implementation of the Project.

County General Plan 2035

While the County General Plan does not apply to the site, a summary of the consistency of the Project with guiding principles and relevant goals and policies in the County General Plan 2035 is provided in Table 4.9-2. As discussed below, the Project would not conflict with the guiding principles and relevant goals and policies in the County General Plan 2035.

**TABLE 4.9-2
COUNTY GENERAL PLAN CONSISTENCY**

Goal/Policy	Project Consistency
Guiding Principle	
1. Employ smart growth	Consistent: The Project would not be considered a transit-oriented project but would reuse an existing detention facility and would not conflict with smart growth strategies for sustainable practices and the conservation of natural resources.
2. Ensure community services and infrastructure are sufficient to accommodate growth	Consistent: The Project would be adequately served by public services and utilities (see Section 4.12, Public Services and Section 4.14, Utilities and Service Systems).
3. Provide the foundation for a strong and diverse economy	Consistent: The Project would reintroduce jobs to the MLDC and either have minimal impact or would improve the jobs-housing balance in the Lancaster area (see Section 4.11, Population and Housing).
4. Excellence in environmental resources management	Consistent: The Project would have no or less than significant impacts on air, wildlife habitats, mineral resources, agricultural land, forests, and open space. Impacts on groundwater resources would be reduced by obtaining water service from County Waterworks District 40.
5. Provide healthy, livable and equitable communities	Consistent: The Project would comply with existing regulations related to public health and safety. It would also avoid impacts to the Polaris Flight Academy Historic District (see Section 4.4, Cultural Resources).
Land Use Element Goal/Policy	
Policy LU 4.1: Encourage infill development on vacant, underutilized, and/or brownfield sites	Consistent: The Project is consistent with this policy since it involves the rehabilitation and reuse of an underutilized detention facility.
Policy LU 4.2: Encourage the adaptive reuse of underutilized structures and the revitalization of older, economically distressed neighborhoods	
Policy LU 7.6: Ensure that proposed land uses located within Airport Influence Areas are compatible with airport operations through compliance with airport land use compatibility plans.	Consistent: The Project would not conflict with the General William J. Fox Airfield Land Use Compatibility Plan or the FAR Part 77 Regulations for the on-site helipad, as discussed in Section 4.7, Hazards and Hazardous Materials, of this EIR.
Policy LU 7.7: Review all proposed projects located within Airport Influence Areas for consistency with policies of the applicable airport land use compatibility plan.	

**TABLE 4.9-2
COUNTY GENERAL PLAN CONSISTENCY**

Goal/Policy	Project Consistency
Policy LU 7.4: Ensure land use compatibility in areas adjacent to military installations and where military operations, testing, and training activities occur.	Consistent: The Project site is located near military installations but proposed buildings would not be located where military operations, testing, and training activities occur.
<p>Policy LU 8.2: Evaluate the potential impact of new structures within MOAs and HRAIZs to ensure the safety of the residents on the ground and continued viability of military operations. In the review of development within MOAs and HRAIZs, consider the following:</p> <ul style="list-style-type: none"> • Uses that produce electromagnetic and frequency spectrum interference, which could impact military operations; • Uses that release into the air any substance such as steam, dust and smoke, which impair pilot visibility; • Uses that produce light emissions, glare or distracting lights, which could interfere with pilot vision or be mistaken for airfield lighting; and • Uses that physically obstruct any portion of the MOA and/or HRAIZ due to relative height above ground level. 	Consistent: The Project site is located within the designated High Risk of Adverse Impact Zone (HRAIZ) in the County General Plan. The Project would not produce electromagnetic and frequency spectrum interference. The Project would not release into the air any substance such as steam, dust and smoke. Dust from temporary construction activities would be reduced by dust control measures, as discussed in Section 4.2, Air Quality. The Project would not produce light emissions, glare or distracting lights, as discussed in Section 4.1, Aesthetics. Also, the Project would not obstruct the HRAIZ since the proposed buildings would be approximately 30 feet tall and would not be higher than existing structures on the site, and the communications tower would comply with FAA height restrictions.
Policy LU 10.3: Consider the built environment of the surrounding area in the design and scale of new or remodeled buildings, architectural styles, and reflect appropriate features such as massing, materials, color, detailing or ornament	Consistent: New buildings would be constructed in a similar scale and massing to the buildings that would remain on the site (see Section 4.1, Aesthetics).
Policy LU 10.4: Promote environmentally sensitive and sustainable design	Consistent: New buildings would be designed and constructed with sustainable principles to obtain the equivalency of LEED certification. The Project would also comply with the County's LID Ordinance, Green Building Standards Code, Green Building Ordinance (see Section 4.6, Greenhouse Gas).
Goal LU 11: Development that utilizes sustainable design techniques.	
Mobility Element Goal/Policy	
Policy M 4.15: Reduce vehicle trips through the use of mobility management practices, such as the reduction of parking requirements, employer/institution based transit passes, regional carpooling programs, and telecommuting.	Consistent: The Project will include an Employee Commute Reduction Plan (ECRP), commonly known as the Rideshare Plan, in accordance with Los Angeles County Code Chapter 5.9-Vehicle Trip Reduction.
Air Quality Element Goal/Policy	
Policy AQ 1.2: Encourage the use of low or no volatile organic compound (VOC) emitting materials.	Consistent: As discussed in Section 4.1, Air Quality, the Project would comply AVAQMD Rule 1113, which limits the volatile organic compound content of architectural coatings.
Policy AQ 1.3: Reduce particulate inorganic and biological emissions from construction, grading, excavation, and demolition to the maximum extent feasible.	Consistent: As discussed in Section 4.1, Air Quality, the Project would comply with all applicable regulations and County's Specifications No. 7266 to reduce particulate emissions during construction, grading, excavation, and demolition.

**TABLE 4.9-2
COUNTY GENERAL PLAN CONSISTENCY**

Goal/Policy	Project Consistency
Policy AQ 3.2: Reduce energy consumption in County operations by 20 percent by 2015.	Consistent: New buildings would be designed and constructed with sustainable principles to obtain the equivalency of LEED certification and the Project would comply with the County's Green Building Standards Code, Green Building Ordinance. The Project's electrical demand would be off-set by up to one MW of solar-generated energy by the County's adjacent solar energy facility and would have video-visiting stations (see Section 4.6, Greenhouse Gas).
Policy AQ 3.3: Reduce water consumption in County operations.	Consistent: The Project would incorporate water conservation measures as required by County's Green Building Standards Code and other measures to obtain the equivalency of LEED certification.
Policy AQ 3.5: Encourage energy conservation in new development and municipal operations.	Consistent: The Project would implement energy conservation measures, as discussed under Policy AQE 3.2 above and in Section 4.6, Greenhouse Gas.
Conservation and Natural Resources Element Goal/Policy	
Policy C/NR 5.1: Support the LID philosophy, which seeks to plan and design public and private development with hydrologic sensitivity, including limits to straightening and channelizing natural flow paths, removal of vegetative cover, compaction of soils, and distribution of naturalistic BMPs at regional, neighborhood, and parcel-level scales	Consistent: The Project would comply with NPDES and County regulations, including the County's LID Ordinance, to reduce its impact on the local hydrology and prevent increases in runoff volume and velocity. Impacts to groundwater resources underlying the site would be avoided by obtaining water service from the Los Angeles County Waterworks District No. 40 (see Section 4.8, Hydrology and Water Quality).
Policy C/NR 5.2: Require compliance by all County departments with adopted Municipal Separate Storm Sewer System (MS4), General Construction, and point source NPDES permits.	
Policy C/NR 6.1: Support the LID philosophy, which incorporates distributed, post-construction parcel-level stormwater infiltration as part of new development	
Policy C/NR 7.1: Support the LID philosophy, which mimics the natural hydrologic cycle using undeveloped conditions as a base, in public and private land use planning and development design.	
C/NR 14.1: Mitigate all impacts from new development on or adjacent to historic, cultural, and paleontological resources to the greatest extent feasible.	Consistent: The Project would not affect the contributing structures within the Polaris Flight Academy Historic District and would protect any discovered archaeological and paleontological resources (see Section 4.4, Cultural Resources).
Policy C/NR 14.3: Support the preservation and rehabilitation of historic buildings.	
Policy C/NR 14.5: Promote public awareness of historic, cultural, and paleontological resources.	
Policy C/NR 14.6: Ensure proper notification and recovery processes are carried out for development on or near historic, cultural, and paleontological resources.	
Safety Element Goal/Policy	
Policy S 4.5: Ensure that there are adequate resources, such as sheriff and fire services, for emergency response.	Consistent: The Project would comply with State regulations for the development and implementation of a fire suppression pre-plan, an evacuation plan, a plan for the emergency housing of inmates in the case of fire, and a manual for emergency procedures (see Section 4.12, Public Services).

**TABLE 4.9-2
COUNTY GENERAL PLAN CONSISTENCY**

Goal/Policy	Project Consistency
Public Services and Facilities Element Policy	
Policy PS/F 1.2: Ensure that adequate services and facilities are provided in conjunction with development through phasing or other mechanisms.	Consistent: Project impacts on public services would be less than significant (see Section 4.12, Public Services and Recreation). Infrastructure improvements would be made on-site and off-site to serve the Project (see Section 4.14, Utilities and Service Systems).
Policy PS/F 1.3: Ensure coordinated service provision through collaboration between County departments and service providers.	Consistent: The Project would be served by County Waterworks District No. 40 and County Sanitation District No. 14.
Policy PS/F 2.1: Support water conservation measures.	Consistent: The Project would implement water conservation measures required under the County's Green Building Standards Code and other water conservation measures to obtain the equivalency of LEED certification.
Policy PS/F 3.1: Increase the supply of water through the development of new sources, such as recycled water, gray water, and rainwater harvesting.	Consistent: The schematic storm drainage plan for the Project would allow treated stormwater to percolate into the ground and incrementally contribute to underlying groundwater resources, while the Project would obtain imported water to support Project operations (see Section 4.8, Hydrology and Water Quality).
Policy PS/F 5.5: Reduce the County's waste stream by minimizing waste generation and enhancing diversion.	Consistent: The Project would comply with the County's Green Building Standards Code and Construction and Demolition Debris Recycling and Reuse Ordinance and would implement waste reduction and recycling measures per County policies (see Section 4.14, Utilities and Service Systems).
Policy PS/F 5.6: Encourage the use and procurement of recyclable and biodegradable materials.	
Policy PS/F 5.7: Encourage the recycling of construction and demolition debris generated by public and private projects.	
Policy PS/F 5.9: Encourage the availability of trash and recyclables containers in new developments, public streets, and large venues.	
Policy PS/F 6.8: Encourage projects that incorporate onsite renewable energy systems.	Consistent: The Project's electrical demand would be off-set by up to one MW of solar-generated energy by the County's adjacent solar energy facility.
Economic Development Element Policy	
Policy ED 5.10: Initiate vocational training programs that provide the skills necessary for participation in the labor force.	Consistent: The Project would provide vocational training for female inmates. Also, the Project would create jobs for residents in the surrounding area.
Source: LACDRP 2015a (Goals and Policies)	

The Mobility Element identifies West Avenue I as an existing Major Highway and 60th Street West is designated as a proposed Expressway. Aside from driveway improvements, no roadway improvements are proposed by the Project; thus, the Project would not conflict with the Mobility Element. The Safety Element also identifies West Avenue I as a highway disaster route but no improvements are proposed by the Project on this road. No conflict with the Safety Element is expected.

The Antelope Valley Areawide General Plan does not apply to areas within incorporated cities and does not have a land use designation for the Project site. Similarly, the County Zoning Code does not have a zoning designation for the site. Chapter 22.36 of Title 22, Planning and Zoning, of the County Code states that County-owned property may be used for any use, in addition to the uses permitted in the zone in which it is located. The Project site is designated as Public Use

in the Lancaster General Plan Land Use Map and Zoning Map, where detention facilities are allowed. The Project would not conflict with the Antelope Valley Areawide General Plan or Title 22, Planning and Zoning, of the County Code.

SCAG's Regional Plans

The Project would not conflict with plans, policies, or regulations related to regional land use, transportation, air quality, or other issues. Consistency with SCAG's RCP, the RHNA, and the RTP/SCS is provided below.

Regional Comprehensive Plan

Table 4.9-3 assesses the Project's consistency with the goals of the RCP. As shown in the analysis, the Project would not conflict with relevant goals in the RCP.

**TABLE 4.9-3
REGIONAL COMPREHENSIVE PLAN CONSISTENCY**

RCP Issue	RCP Goal	Specific Plan Consistency
Land Use and Housing	Focusing growth in existing and emerging centers and along major transportation corridors.	Consistent: The Project would be located on a currently developed site.
	Creating significant areas of mixed-use development and walkable, people-scaled communities.	Not Applicable: The Project would not be an appropriate use in a mixed-use development.
	Providing new housing opportunities, with building types and locations that respond to the region's changing demographics.	Not Applicable: The Project would provide transitional housing to female inmates in the County and would not be responsive to housing needs based on regional demographics.
	Targeting growth around existing and planned transit stations.	Not Applicable: The Project involves the redevelopment of an existing land use and would not be an appropriate land use for targeted growth associated with transit-oriented development.
	Injecting new life into underused areas by creating vibrant new business districts, redeveloping old buildings and building new businesses and housing on vacant lots.	Consistent: The Project would reuse an existing detention center through rehabilitation and renovation of existing structures and the construction of new buildings.
	Preserving existing, stable single-family neighborhoods.	Not Applicable: No single-family neighborhood would be affected by the Project.
	Protecting important open space, environmentally sensitive areas, and agricultural lands from development.	Consistent: The Project would reuse an existing detention center and would not affect or encourage the development of open spaces, environmentally sensitive lands, or agricultural lands.

**TABLE 4.9-3
REGIONAL COMPREHENSIVE PLAN CONSISTENCY**

RCP Issue	RCP Goal	Specific Plan Consistency
Open Space and Habitat	<p>Ensure a sustainable ecology by protecting and enhancing the region's open space infrastructure and mitigate growth and transportation related impacts to natural lands by:</p> <ul style="list-style-type: none"> • Conserving natural lands that are necessary to preserve the ecological function and value of the region's ecosystems; • Conserving wildlife linkages as critical components of the region's open space infrastructure; • Coordinating transportation and open space to reduce transportation impacts to natural lands. 	<p>Consistent: The Project would reuse an existing detention center and would not affect or encourage the development of open spaces, environmentally sensitive lands, or agricultural lands. Section 4.3, Biological Resources, analyzes Project impacts on sensitive biological resources and mitigation has been developed to reduce impacts to nesting birds and roosting bats to levels less than significant.</p>
	<p>Enhance the region's parks, trails and community open space infrastructure to support the aesthetic, recreational and quality-of-life needs, providing the highest level of service to our growing region by:</p> <ul style="list-style-type: none"> • Creating new community open space that is interconnected, accessible, equitably distributed, provides public health benefits, and meets the changing and diverse needs of communities; • Improving existing community open space through urban forestry and other programs that provide environmental benefits. 	<p>Not Applicable: The Project would not be located near open space areas, parks, or trails, nor would it affect the development such land uses.</p>
	<p>Preserve the productivity and viability of the region's agricultural lands while supporting a sustainable economy and region by:</p> <ul style="list-style-type: none"> • Maintaining a viable level of agriculture to support economic and food supply needs for the region while supporting sustainable energy, air quality and transportation policies; • Promote and support a strong locally-grown food system by encouraging community farming and developing cooperative farming initiatives that use sustainable farming practices. 	<p>Consistent: The Project would reuse an existing detention center and would not affect or encourage the development of open spaces, environmentally sensitive lands, or agricultural lands. As described in Section 3.0, Project Description, the Culinary Arts program for inmates is consistent with this goal as well and would include cooking and baking instructions, a restaurant-setting room, and access to food supplies and a small kitchen, with defined gardening areas for both vegetable and flower cultivation.</p>

**TABLE 4.9-3
REGIONAL COMPREHENSIVE PLAN CONSISTENCY**

RCP Issue	RCP Goal	Specific Plan Consistency
<p>Water</p>	<p>Develop sufficient water supplies through environmentally sustainable imports, local conservation and conjunctive use, reclamation and reuse to meet the water demands created by continuing regional growth.</p>	<p>Consistent: Water supply and service to the Project site would be provided by County Waterworks District 40, as discussed in Section 4.14, Utilities and Service Systems.</p>
	<p>Achieve water quality improvements through implementation of land use and transportation policies and programs that promote water stewardship and eliminate water impairments and waste in the region.</p>	<p>Consistent: This Project would not influence watershed planning or land use or transportation policies or programs. The Project would have less than significant impacts on water quality groundwater resources with incorporation of Best Management Practices (BMPs) and Low Impact Development (LID) standards, as discussed in Section 4.8, Hydrology and Water Quality. Project operations would eliminate the use of the groundwater wells on the Project site and would be provided water service via County Waterworks District 40. A Water Supply Assessment was prepared for the Project and is summarized in Section 4.14, Utilities and Service Systems.</p>
	<p>Foster comprehensive and collaborative watershed planning within the region that produces waterwise programs and projects with multiple benefits and ecosystem protections, integrating local government planning efforts with those of special districts, environmental advocates and other watershed stakeholders.</p>	
<p>Energy</p>	<p>Reduce our region's consumption of non-renewable energy by:</p> <ul style="list-style-type: none"> • Supplying the energy needs of the region today in a way that reduces the negative environmental impacts, social inequities, and economic hardship on future generations; • Developing the infrastructure and social capital to adapt to a future energy economy with a constrained supply. 	<p>Consistent: The Project would redevelop an existing land use, thereby conserving resources through re-purposing of existing facilities. The Project would comply with the California Green Building Standards (CalGreen) Code, which includes energy conservation measures, as discussed in Section 4.6, Greenhouse Gas. The Project would also be served by the County's adjacent solar energy facility, and buildings over 10,000 square feet would be constructed to achieve the equivalency of a Leadership in Energy and Environmental Design (LEED) certification.</p>
	<p>Increase the share of renewable energy in the region by:</p> <ul style="list-style-type: none"> • Ensuring the resiliency of the region's economy by encouraging and supporting renewable energy infrastructure; and • Developing renewable energy sources that reduce the amount of air emissions emitted through the combustion of fossil fuels. 	

**TABLE 4.9-3
REGIONAL COMPREHENSIVE PLAN CONSISTENCY**

RCP Issue	RCP Goal	Specific Plan Consistency
Air Quality	Reduce emissions of criteria pollutants to attain federal air quality standards by prescribed dates and state ambient air quality standards as soon as practicable.	Consistent: The Project would have less than significant impacts to air quality through compliance with applicable Antelope Valley Air Quality Management District (AVAQMD) Rules. Potential exposure of on-site construction workers to Valley Fever spores due to disturbance of soils would be less than significant with mitigation, as discussed in Section 4.2, Air Quality.
	Reverse current trends in greenhouse gas emissions to support sustainability goals for energy, water supply, agriculture, and other resource areas.	Consistent: The Project would have less than significant impacts to GHG emissions, as discussed in Section 4.6, Greenhouse Gas. The Project would comply with the CalGreen Code, which includes energy conservation measures, as discussed in Section 4.6, Greenhouse Gas. The Project's electrical demand would be off-set by up to one MW of solar-generated energy by the County's adjacent solar energy facility, and buildings over 10,000 square feet would be constructed to achieve the equivalency of a LEED certification.
	Minimize land uses that increase the risk of adverse air pollution-related health impacts from exposure to toxic air contaminants, particulates (PM10, PM2.5, ultrafine), and carbon monoxide.	Consistent: The Project does not propose heavy industrial uses that could be major stationary sources of air pollutants. The Project would include an Employee Commute Reduction Plan (ECRP), commonly known as the Rideshare Plan, in accordance with the Los Angeles County Code (Chapter 5.9, Vehicle Trip Reduction). The Project would also provide bicycle storage for both visitors and employees.
	Expand green building practices to reduce energy-related emissions from developments to increase economic benefits to business and residents.	Consistent: The Project would comply with the CalGreen Code, which includes energy conservation measures, as discussed in Section 4.6, Greenhouse Gas. The Project's electrical demand would be off-set by up to one MW of solar-generated energy by the County's adjacent solar energy facility, and new buildings over 10,000 square feet would be constructed to achieve the equivalency of a LEED certification.
Solid Waste	A region that conserves our natural resources, reduces our reliance on landfills, and creates new economic opportunities in the most environmentally responsible manner possible.	Consistent: The Project would redevelop an existing land use, thereby conserving resources through repurposing existing facilities. The Project would implement recycling and waste-reduction measures per County regulations and policies, as discussed in Section 4.14, Utilities and Service Systems.

**TABLE 4.9-3
REGIONAL COMPREHENSIVE PLAN CONSISTENCY**

RCP Issue	RCP Goal	Specific Plan Consistency
Transportation	A more efficient transportation system that reduces and better manages vehicle activity.	Not Applicable: This is a broad goal outside the Project's scope. Project impacts on the local street system are discussed in Section 4.13, Transportation and Traffic.
	A cleaner transportation system that minimizes air quality impacts and is energy efficient.	Not Applicable: This is a broad goal outside the Project's scope.
Security and Emergency Preparedness	Ensure transportation safety, security, and reliability for all people and goods in the region.	Not Applicable: The Project would not change the roadway network in the planning area or otherwise affect transportation reliability. The Project would implement an Emergency Response Plan, as addressed in Section 4.7, Hazards and Hazardous Materials. Impacts on transportation are discussed in Section 4.13, Transportation and Traffic.
	Prevent, protect, respond to, and recover from major human-caused or natural events in order to minimize the threat and impact to lives, property, the transportation network and the regional economy.	
Economy	Achieve economic development while being consistent with the region's sustainability goals for land use, air quality, and other resource areas.	Consistent: The Project would create employment opportunities in Lancaster and improve the local jobs/housing balance. The Project is consistent with the City's general plan and zoning regulations, and would have less than significant impacts on air quality, cultural resources, and biological resources with the incorporation of mitigation.
	Enable business to be profitable and competitive (locally, regionally, nationally, and internationally).	Not Applicable: The Project is not a business enterprise.
	Ensure that the maximum number of residents participate in the growth of prosperity in the SCAG region.*	Not Applicable: This is a broad goal outside the Project's scope.
	Promote sustained economic health through diversifying the region's economy, strengthening local self-reliance and expanding competitiveness.	Consistent: The Project would create employment opportunities in Lancaster and improve the local jobs/housing balance.
	Ensure a healthy, flourishing economy that provides sufficient employment opportunities to decrease poverty and meet the basic needs of all the people who participate in our economy by promoting education and workforce training policies that give residents an opportunity to compete for the full range of jobs available with good wages and benefits.	
<p>* Note that the goal of broadly shared prosperity does not imply a strategy of redistributing today's income. It is based on expanding opportunity and the commitment of business and government leaders to recognize that individuals and communities left behind today must be made full partners in the growth of tomorrow's economy.</p> <p>Source: SCAG 2008 (Issues and Goals).</p>		

Regional Housing Needs Assessment

The RHNA is not a written document with set goals for regional housing development or programs. Instead, it allocates the region's future housing needs to individual jurisdictions by quantifying the

number of dwelling units that are needed to meet future growth by income group. It also estimates the existing housing needs of each jurisdiction for use in developing housing programs and policies to be included in the Housing Element of each jurisdiction. The Project does not propose construction of new housing; demolition of existing housing; or alteration of the City's housing stock or policies. No change in the existing or future housing needs of the City would occur with the Project. Thus, no conflict with the RHNA would be created by the Project.

Regional Transportation Plan/Sustainable Communities Strategy

The RTP/SCS serves as the planning document for improving the transportation system of the region. Table 4.9-4 assesses the Project's consistency with the goals of the RTP/SCS.

**TABLE 4.9-4
REGIONAL TRANSPORTATION PLAN/SUSTAINABLE
COMMUNITIES STRATEGY CONSISTENCY**

RTP/SCS Goal	Project Consistency
Align the plan investments and policies with improving regional economic development and competitiveness.	Consistent: The Project would create employment opportunities in Lancaster and improve the local jobs/housing balance.
Maximize mobility and accessibility for all people and goods in the region.	Not Applicable: The Project would not change the roadway network. The Project would have no effect on regional mobility or accessibility for the transport of people or goods. The Project would also include video visitation stations and video interview rooms to decrease vehicle trips to the Project site.
Ensure travel safety and reliability for all people and goods in the region.	
Preserve and ensure a sustainable regional transportation system.	
Maximize the productivity of our transportation system.	Consistent: The Project would utilize the existing roadway network and public transit with no significant impacts to local intersection or roadway operations.
Protect the environment and health of our residents by improving air quality and encouraging active transportation (non-motorized transportation, such as bicycling and walking).	Consistent: There is an Antelope Valley Transit Authority (AVTA) bus route that serves the site and that connects to Metrolink's passenger train services. The Project would also include video visitation stations and video interview rooms to decrease vehicle trips to the Project site. The Project would include an Employee Commute Reduction Plan (ECRP), commonly known as the Rideshare Plan, in accordance with the Los Angeles County Code (Chapter 5.9, Vehicle Trip Reduction). The Project would also implement bicycle storage for both visitors and employees.
Actively encourage and create incentives for energy efficiency, where possible.	Consistent: The Project would have less than significant impacts to greenhouse gas (GHG) emissions, as discussed in Section 4.6, Greenhouse Gas. The Project would comply with the California Green Building Standards (CalGreen) Code, which includes energy conservation measures, as discussed in Section 4.6, Greenhouse Gas. The Project's electrical demand would be off-set by up to one MW of solar-generated energy by the County's adjacent solar energy facility, and buildings over 10,000 square feet would be constructed to achieve the equivalency of LEED certification.
Encourage land use and growth patterns that facilitate transit and non-motorized transportation.	Consistent: There is an AVTA bus route that serves the site and that connects to Metrolink's passenger train services. The Project would also include video visitation stations and video interview rooms to decrease vehicle trips to the Project site. The Project would include an ECRP, commonly known as the Rideshare Plan, in accordance with the Los Angeles County Code (Chapter 5.9, Vehicle Trip Reduction). The Project would also implement bicycle storage for both visitors and employees.

**TABLE 4.9-4
REGIONAL TRANSPORTATION PLAN/SUSTAINABLE
COMMUNITIES STRATEGY CONSISTENCY**

RTP/SCS Goal	Project Consistency
Maximize the security of the regional transportation system through improved system monitoring, rapid recovery planning, and coordination with other security agencies.	Not Applicable: The Project would not affect security on the roadways or otherwise implement monitoring or planning for the transportation system.
Source: SCAG 2012b (Goals).	

The RTP/SCS also identifies SCAG’s main safety and security goals. These are the same goals in the RCP, as discussed in Table 4.9-2 above. The RTP/SCS also lists its goals and benefits as better placemaking; lower cost to taxpayers and families; benefits to public health and the environment; greater responsiveness to demographics and the changing housing market; and improved access and mobility. These are broad goals that are outside the Project’s scope and would not be affected by the Project. Other goals in the RTP/SCS for environmental justice, zero-emissions rail system, and dense bicycle network are not relevant to the Project.

Thus, the Project is consistent with the goals of the RTP/SCS. No FTIP projects, which implement the RTP/SCS, are specifically located adjacent to the site, and no FTIP projects in the City of Lancaster or in the Antelope Valley would be affected by the Project. No conflict with the RTP/SCS would occur.

Regional Growth Forecasts

Growth projections for individual cities and counties have been prepared by SCAG as part of its regional planning efforts for the development of the RCP, RTP/SCS, and RHNA. These growth projections are based on input provided by the individual cities and counties. The Project would not conflict with the Lancaster General Plan, which the City uses, along with other data, in developing growth projections provided to SCAG for use in regional growth forecasts. While the Project would increase employment in the City of Lancaster, no change in land use is proposed by the Project. The City of Lancaster has also been informed about the Project and can adjust their local input to account for the jobs and inmates that would accompany future Project implementation. Thus, no inconsistency with the growth projections for Lancaster (as provided in Table 4.11-6 in Section 4.11, Population and Housing, of this EIR), as used by SCAG in the development of regional plans, would occur. No conflict with existing land use plans and policies would occur and no mitigation is required.

Threshold 4.9c: Would the project conflict with any applicable habitat conservation plan or natural community conservation plan?

The Project site is located within the boundaries of the *California Desert Conservation Area Plan* and the *West Mojave Plan*, which is an amendment to the California Desert Conservation Area Plan (BLM 2006, 2014). The Project site is developed and does not support sensitive species proposed for conservation by these plans. No conflict with the California Desert Conservation Area Plan or the West Mojave Plan would occur with the Project. This is discussed in greater detail in Section 4.3, Biological Resources, of this EIR.

4.9.5 CUMULATIVE IMPACTS

Cumulative land use impacts can be considered in light of increasing planned and proposed projects in the surrounding area (cumulative projects) and growth and development in the Antelope Valley due to new development, redevelopment and increased development densities and intensities. Cumulative changes in land uses are expected over time, as undeveloped land is developed with urban uses and as rural areas support higher housing densities and more intensive development. These changes in land uses are expected to be subject to the land use controls and regulations of local jurisdictions (Cities of Lancaster or Palmdale or the County of Los Angeles) and would be allowed in accordance with adopted land use policies and plans. No land use conflict or incompatibilities are expected.

As discussed above, the Project would not divide an established community; would not conflict with the County General Plan and Antelope Valley Areawide General Plan goals and policies or the City of Lancaster's General Plan goals and policies. Also, the Project would not conflict with SCAG's regional plans, with the *California Desert Conservation Area Plan*, or with the *West Mojave Plan*. Therefore, the Project would not have an incremental contribution to cumulatively land use impacts that may occur with other development projects and future growth and development in the Antelope Valley. No cumulative impacts on land use and planning would occur and no mitigation is required.

4.9.6 MITIGATION MEASURES

There would be no significant impacts related to land use and planning and no mitigation is required.

4.9.7 LEVEL OF SIGNIFICANCE AFTER MITIGATION

The Project would not result in significant impacts related to land use and planning. No significant unavoidable or cumulative impacts would occur.

4.9.8 REFERENCES

Lancaster, City of. 2015 (May, last updated). *Lancaster, California – Code of Ordinances*. Tallahassee, FL: Municode Corporation for the City. https://www.municode.com/library/ca/lancaster/codes/code_of_ordinances?nodeId=16042.

———. 2010 (July 13). Central Zoning Map. Lancaster, CA: the City.

———. 2009a (July 14). *General Plan 2030*. Lancaster, CA: the City.

———. 2009b (July 14). Lancaster General Plan Land Use Map. Lancaster, CA: the City.

Los Angeles County Department of Regional Planning (LACDRP). 2015a (March). General Plan 2035. Los Angeles, CA: LACDRP. <http://planning.lacounty.gov/generalplan>. <http://planning.lacounty.gov/generalplan/draft>.

———. 2015b (March 10, access date). Town and Country (Antelope Valley Area Plan Update) Latest News. Los Angeles, CA: LACDRP. <http://planning.lacounty.gov/tnc>.

———. 2014 (August 22). *Town and Country- Documents for review and Comment – Draft Plan*. Los Angeles, CA: LACDRP. <http://planning.lacounty.gov/tnc/documents/>.

- Southern California Association of Governments (SCAG). 2015. About SCAG (Organizational Responsibilities). Los Angeles, CA: SCAG. <http://www.scag.ca.gov/about/Pages/Home.aspx>.
- . 2014a. RHNA & Housing (5th Cycle Final RHNA Allocation). Los Angeles, CA: SCAG. <http://www.scag.ca.gov/programs/Pages/Housing.aspx>.
- . 2014b. RHNA Allocation Methodology Technical Appendices. Los Angeles, CA: SCAG. <http://www.scag.ca.gov/Documents/RHNAFinalMethodologyAppendices110311.pdf>.
- . 2014c (September 11). 2015 Adopted FTIP. Los Angeles, CA: SCAG. <http://ftip.scag.ca.gov/Pages/2015/adopted.aspx>.
- . 2012a. Adopted 2012 RTP Integrated Growth Forecast. Los Angeles, CA: SCAG.
- . 2012b. (April). *2012–2035 Regional Transportation Plan/Sustainable Communities Strategy*. Los Angeles, CA: SCAG. <http://rtpscs.scag.ca.gov/Pages/2012-2035-RTP-SCS.aspx>.
- . 2012c. Growth Forecast by Subregion. Los Angeles, CA: SCAG.
- . 2008 (October 2). Regional Comprehensive Plan. Los Angeles, CA: SCAG. http://www.scag.ca.gov/rcp/pdf/finalrcp/f2008RCP_Complete.pdf.
- U.S. Department of the Interior Bureau of Land Management (BLM). 2014 (June 18). West Mojave (WEMO) Plan Amendment Activity. Moreno Valley, CA: BLM. http://www.blm.gov/ca/st/en/fo/cdd/west_mojave__wemo.html
- . 2006. California Desert Conservation Area Plan. Washington, D.C.: BLM.

This page intentionally left blank

4.10 NOISE

This section analyzes potential noise impacts associated with development of the proposed Project. This section provides background information on noise and noise assessment criteria; presents existing noise levels in the Project area; and examines noise impacts that could potentially occur during construction and operation of the Project. When necessary, mitigation measures are recommended to meet County of Los Angeles noise standards.

Noise and Vibration Definitions

Sound is a vibratory disturbance created by a moving or vibrating source that is capable of being detected by the hearing organs. Noise is defined as sound that is loud, unpleasant, unexpected, or undesired and may therefore be classified as a more specific group of sounds. The effects of noise on people can include general annoyance, interference with speech communication, sleep disturbance and, in the extreme, hearing impairment.

Decibels and Frequency

In its most basic form, a continuous sound can be described by its frequency or wavelength (pitch) and its amplitude (loudness). Sound pressure levels are described in units called the decibel (dB). Decibels are measured on a logarithmic scale that quantifies sound intensity in a manner similar to the Richter scale used for earthquake magnitudes. Thus, a doubling of the energy of a noise source, such as doubling of traffic volume, would increase the noise level by 3 dB; a halving of the energy would result in a 3 dB decrease.

Groundborne vibration consists of oscillatory waves that propagate from the source through the ground to adjacent structures. The frequency of a vibrating object describes how rapidly it is oscillating. The number of cycles per second of oscillation is the vibration frequency, which is described in terms of hertz (Hz). The normal frequency range of most groundborne vibration that can be felt generally starts from a low frequency of less than 1 Hz to a high of about 200 Hz.

Perception of Noise and Vibration

Noise

The human ear is not equally sensitive to all frequencies on the sound spectrum. To accommodate this phenomenon, the A-scale, which approximates the frequency response of the average young ear when listening to most ordinary everyday sounds, was devised. When people make relative judgments of the loudness or annoyance of a sound, their judgments correlate well with the A-scale sound levels of those sounds. Therefore, the "A-weighted" noise scale is used for measurements and standards involving the human perception of noise. Noise levels using A-weighted measurements are written dB(A) or dBA. Table 4.10-1, Noise Levels for Common Activities shows the relationship of various noise levels in dBA to commonly experienced indoor and outdoor activities.

**TABLE 4.10-1
NOISE LEVELS FOR COMMON ACTIVITIES**

Common Outdoor Activities	Noise Level (dBA)	Common Indoor Activities
–	110	Rock Band
Jet Fly-over at 300 m (1,000 ft)	100	–
Gas Lawn Mower at 1 m (3 ft)	90	–
Diesel Truck at 15 m (50 ft) at 80 km/hr (50 mph)	80	Food Blender at 1 m (3 ft); Garbage Disposal at 1 m (3 ft)
Noisy Urban Area, Daytime Gas Lawn Mower at 30 m (100 ft)	70	Vacuum Cleaner at 3 m (10 ft)
Commercial Area, Heavy Traffic at 90 m (300 ft)	60	Normal Speech at 1 m (3 ft)
Quiet Urban Daytime	50	Large Business Office Dishwasher in Next Room
Quiet Urban Nighttime	40	Theater, Large Conference Room (Background)
Quiet Suburban Nighttime	30	Library
Quiet Rural Nighttime	20	Bedroom at Night, Concert Hall (Background)
–	10	Broadcast/Recording Studio
Lowest Threshold of Human Hearing	0	Lowest Threshold of Human Hearing
dBA: A-weighted decibels; m: meter; km/hr: kilometers per hour; ft: feet; mph: miles per hour		
Source: Caltrans 2013a.		

Human perception of noise has no simple correlation with acoustical energy. The perception of noise is not linear in terms of dBA or in terms of acoustical energy. Two noise sources do not “sound twice as loud” as one source. It is widely accepted that the average healthy ear can barely perceive changes of a 3 dBA increase or decrease; that a change of 5 dBA is readily perceptible; and that an increase or decrease of 10 dBA sounds twice or half as loud, respectively.

As noise travels from the source to the receiver, noise changes both in level and frequency spectrum. The most obvious change is the decrease in noise as the distance from the source increases. The manner in which noise reduces with distance (noise attenuation) depends on a number of factors, such as ground absorption, atmospheric effects, and shielding (as by natural and man-made barriers). Two types of site conditions are commonly used in noise prediction: soft site and hard site conditions. Hard sites (i.e., sites with a reflective surface between the source and the receiver, such as parking lots or smooth bodies of water) receive no excess ground attenuation, and the changes in noise levels with distance (drop-off rate) are simply the geometric spreading of the source. Soft sites are sites that have an absorptive ground surface (e.g., soft dirt, grass, or scattered bushes and trees) and receive an excess ground attenuation value of 1.5 dBA per doubling of distance.

Vibration

While people have varying sensitivities to vibrations at different frequencies, in general they are most sensitive to low-frequency vibration. Vibration in buildings caused by construction activities may be perceived as motion of building surfaces or rattling of windows, items on shelves, and pictures hanging on walls. Vibration of building components can also take the form of an audible low-frequency rumbling noise, which is referred to as groundborne noise. Groundborne noise is usually only a problem when the originating vibration spectrum is dominated by frequencies in the upper end of the range (60 to 200 Hz), or when the structure and the construction activity are connected by foundations or utilities, such as sewer and water pipes.

Although groundborne vibration is sometimes noticeable in outdoor environments, groundborne vibration is almost never annoying to people who are outdoors. The primary concern from vibration is the ability to be intrusive and annoying to residents and other vibration-sensitive land uses. Vibration energy spreads out as it travels through the ground, causing the vibration level to diminish with distance away from the source. The high-frequency vibrations reduce much more rapidly than low frequencies, so that low frequencies tend to dominate the spectrum at large distances from the source.

Noise and Vibration Metrics

Several rating scales (or noise “metrics”) exist to analyze the effects of noise on a community. These scales include the equivalent noise level (L_{eq}), the community noise equivalent level (CNEL), and the day-night average sound level (L_{dn}). Average noise levels over a period of minutes or hours are usually expressed as dBA L_{eq} , which is the equivalent noise level for that time period. The period of time averaging may be specified; for example, $L_{eq(3)}$ would be a three-hour average. When no period is specified, a one-hour average is assumed. It is important to understand that noise of short duration (i.e., a time period substantially less than the averaging period) is averaged into ambient noise during the period of interest. Thus, a loud noise lasting many seconds or a few minutes may have minimal effect on the measured sound level averaged over a one-hour period. Another measure of noise levels is L_N , where N is the percentage of time that the noise level is exceeded. For example, L_{10} is the noise level that is exceeded 10 percent of the time.

To evaluate community noise impacts, a descriptor was developed that accounts for human sensitivity to nighttime noise. The descriptor is the L_{dn} , which represents the 24-hour average sound level with a penalty for noise occurring at night. The L_{dn} computation divides the 24-hour day into 2 periods: daytime (7:00 AM to 10:00 PM) and nighttime (10:00 PM to 7:00 AM). The nighttime sound levels are assigned a 10 dBA penalty prior to averaging with daytime hourly sound levels. CNEL is similar to L_{dn} except that it separates a 24-hour day into 3 periods: daytime (7:00 AM to 7:00 PM), evening (7:00 PM to 10:00 PM), and nighttime (10:00 PM to 7:00 AM). The evening sound levels are assigned a 5 dBA penalty and nighttime sound levels are assigned a 10 dBA penalty prior to averaging with daytime hourly sound levels.

Vibration levels are usually expressed as single-number measurements of vibration magnitude, in terms of velocity or acceleration, which describes the severity of the vibration without the frequency variable. The peak particle velocity (ppv) is defined as the maximum instantaneous positive or negative peak of the vibration signal, usually measured in inches per second (in/sec). As it is related to the stresses that are experienced by buildings, ppv is often used to monitor blasting vibration.

Sensitive Receptors

Noise-sensitive receptors are generally considered to be humans who are engaged in activities or who are utilizing land uses that may be subject to the stress of significant interference from noise. Activities usually associated with sensitive receptors include but are not limited to talking, reading, and sleeping. Noise-sensitive land uses are generally considered to include those uses where noise exposure could result in health-related risks to individuals and places where quiet is an essential element of the intended purpose.

Vibration-sensitive receptors are generally considered to be humans who are engaged in activities or who are utilizing land uses that may be subject to significant interference from vibration. Activities and land uses often associated with vibration-sensitive receptors are similar to those associated with noise-sensitive receptors. Construction vibration is generally associated with pile

driving and rock blasting. Occasionally, large bulldozers and loaded trucks can cause perceptible vibration levels at close proximity. Vibration generated by construction activity has the potential to cause structural damage (i.e., cracking of floor slabs, foundations, columns, beams, or wells) or cosmetic/architectural damage (i.e., cracked plaster, stucco, or tile). Although it is possible for vibration from construction projects to cause building damage, the vibration from construction activities is almost never of sufficient amplitude to cause more than minor cosmetic damage to buildings.

Sensitive noise and vibration receptors are defined in the Los Angeles County General Plan Update Draft EIR as including “residential, schools, libraries, churches, nursing homes, hospitals, and open space/recreation areas where quiet environments are necessary for enjoyment, public health, and safety. Commercial and industrial uses are generally not considered noise- and vibration-sensitive uses, unless noise and vibration would interfere with their normal operations and business activities.” Prisons and detention facilities, being less common land uses, are not specified as being sensitive noise and vibration receptors, but are analyzed as sensitive receptors in this EIR to ensure a conservative analysis, although this means noise impacts may be overstated.

4.10.1 RELEVANT POLICIES AND REGULATIONS

State

California Land Use Compatibility Guidelines

Title 24 of the *California Code of Regulations*, also known as the California Building Standards Code, or more commonly as the California Building Code, requires that residential structures other than detached single-family dwellings be designed to prevent exterior noise intrusion so that the interior community noise exposure level (CNEL) attributable to exterior sources do not exceed 45 dBA in any habitable room with closed windows (CBSC 2015).

Noise compatibility guidelines from the State General Plan Guidelines are shown below in Table 4.10-2, California Land Use compatibility Guidelines (OPR 2003). The noise compatibility guidelines are intended to be incorporated into land use planning decisions to reduce future noise and land use incompatibilities. For example, as shown below in Table 4.10-2, a CNEL at multiple-family homes that does not exceed 65 dB is considered normally acceptable, while levels exceeding 75 dB would be considered clearly unacceptable. These guidelines are primarily used to assess transportation noise impacts to new developments.

**TABLE 4.10-2
CALIFORNIA LAND USE COMPATIBILITY GUIDELINES**

Land Use Category	Community Noise Exposure L _{dn} or CNEL, dB						
	55	60	65	70	75	80	85
Residential (Low-Density Single-Family, Duplex, Mobile Homes)							
Residential (Multiple-Family Homes)							

**TABLE 4.10-2
CALIFORNIA LAND USE COMPATIBILITY GUIDELINES**

Land Use Category	Community Noise Exposure L _{dn} or CNEL, dB						
	55	60	65	70	75	80	85
Transient Lodging (Motels, Hotels)							
Schools, Libraries, Churches, Hospitals, Nursing Homes							
Auditoriums, Concert Halls, Amphitheaters							
Sports Arena, Outdoor Spectator Sports							
Playgrounds, Neighborhood Parks							
Golf Courses, Riding Stables, Water Recreation, Cemeteries							
Office Buildings, Business, Commercial and Professional							
Industrial, Manufacturing, Utilities, Agriculture							
	Normally Acceptable		Conditionally Acceptable		Normally Unacceptable		Clearly Unacceptable
Specified land use is satisfactory based upon the assumption that any buildings involved are of normal conventional construction, without any special noise insulation requirements.	New construction or development should be undertaken only after a detailed analysis of the noise reduction requirement is made and needed noise insulation features are included in the design. Conventional construction, but with closed windows and fresh air supply systems or air conditioning, will normally suffice.	New construction or development should generally be discouraged. If new construction or development does proceed, a detailed analysis of the noise reduction requirements must be made and needed noise insulation features included in the design. Outdoor areas must be shielded.	New construction or development should generally not be undertaken. Construction costs to make the indoor environment acceptable would be prohibitive and the outdoor environment would not be acceptable.				
L _{dn} : Day-Night Average Sound Level; CNEL: Community Noise Equivalent Level; dB: decibel Source: OPR 2003.							

County

County of Los Angeles General Plan Noise Element

The Los Angeles County General Plan 2035 and associated General Plan Update EIR state that the County will utilize the State Land Use Compatibility Guidelines, which are presented in Table 4.10-2 above. As discussed in Section 4.9, Land Use and Planning, the Project site is not specifically addressed by the County General Plan because it is located within the City of Lancaster.

County of Los Angeles Noise Ordinance

Section 12.08 of the County of Los Angeles Code (County Code) contains the County's Noise Ordinance (Noise Ordinance). The Noise Ordinance prohibits unnecessary, excessive, and annoying sounds from sources on private properties by setting limits that cannot be exceeded at adjacent properties.

Transportation Sources

The County's Noise Ordinance requirements are not applicable to mobile noise sources such as automobiles or heavy trucks when traveling in a legal manner on public roadways or on private property. Mobile noise source control is regulated by federal and State laws.

Construction Hours

Section 12.08.440 of the County Code prohibits construction noise between the hours of 7:00 PM and 7:00 AM on weekdays and at any time on Sunday or a federal holiday if it creates a disturbance across a residential or commercial real-property line.

Construction Noise Limits

The County sets maximum construction noise levels "at residential structures" as summarized in Table 4.10-3, County of Los Angeles Construction Equipment Noise Limits. Although Table 4.10-3 allows higher noise levels in the hour between 7:00 PM and 8:00 PM on all days except Sundays and legal holidays, Project construction would be prohibited after 7:00 PM in compliance with Section 12.08.440 of the County Code.

**TABLE 4.10-3
COUNTY OF LOS ANGELES CONSTRUCTION EQUIPMENT NOISE LIMITS**

Time Interval	Single-Family Residential (dBA)	Multi-Family Residential (dBA)	Semi-Residential or Commercial (dBA)
Mobile Equipment			
Daily, except Sundays and legal holidays, 7:00 AM to 8:00 PM	75	80	85
Daily, 8:00 PM to 7:00 AM, and all day Sunday and legal holidays	60	64	70
Stationary Equipment			
Daily, except Sundays and legal holidays, 7:00 AM to 8:00 PM	60	65	70
Daily, 8:00 PM to 7:00 AM, and all day Sunday and legal holidays	50	55	60
dBA: A-weighted decibels			
Source: County of Los Angeles Code §12.08.			

Operation

The County of Los Angeles Noise Ordinance also specifies exterior noise levels that cannot be exceeded at the receiving properties for a specified time period. The general application of these standards is to noise made from one property to another. As stated in the ordinance,

Unless otherwise herein provided, no person shall operate or cause to be operated, any source of sound at any location within the unincorporated county, or allow the creation of any noise on property owned, leased, occupied or otherwise controlled by such person which causes the noise level, when measured on any other property either incorporated or unincorporated, to exceed any of the following exterior noise standards.

Exceptions to the exterior standards include, but are not limited to, construction and residential air conditioning or refrigeration equipment. These two cases are regulated separately, as described below. The County-specified noise standards are listed in Table 4.10-4, County of Los Angeles Exterior Noise Standards. It should be noted that these standards do not apply to the assessment of land use compatibility for transportation noise.

**TABLE 4.10-4
COUNTY OF LOS ANGELES EXTERIOR NOISE STANDARDS**

Noise Zone	Designated Noise Zone Land Use	Time Interval	Exterior Noise Level (dBA)
I	Noise-Sensitive Area	Anytime	45
II	Residential Area	10:00 PM to 7:00 AM	45
		7:00 AM to 10:00 PM	50
III	Commercial Area	10:00 PM to 7:00 AM	55
		7:00 AM to 10:00 PM	60
IV	Industrial Area	Anytime	70
dBA: A-weighted decibels			
Source: County of Los Angeles Code §12.08			

There are no known designated Noise Zone I (noise-sensitive)¹ areas in the Project site vicinity. However, there are Zone II (residential) areas to the west and, at some distance, to the north.

The applicable standards listed in Table 4.10-4 should not be exceeded at the property line of a noise-sensitive use for:

- a cumulative period of more than 30 minutes in any hour. If the ambient L_{50} exceeds the foregoing level, then the ambient L_{50} becomes this standard.
- the applicable standard plus 5 dBA for a cumulative period of more than 15 minutes in any hour. If the ambient L_{25} exceeds the foregoing level, then the ambient L_{25} becomes this standard.
- the applicable standard plus 10 dBA for a cumulative period of more than 5 minutes in any hour. If the ambient L_8 exceeds the foregoing level, then the ambient L_8 becomes this standard.
- the applicable standard plus 15 dBA for more than the standard for a cumulative period of more than 1 minute in any hour. If the ambient L_2 exceeds the foregoing level, then the ambient L_2 becomes this standard.
- the noise standard plus 20 dBA for any time period. If the ambient L_0 exceeds the foregoing level, then the ambient L_0 becomes this standard.

If the measurement location is on a boundary of a property between two different noise zones (see Table 4.10-3), the exterior noise level shall be the arithmetic mean of the exterior noise levels of the subject zones.

County of Los Angeles Vibration Standards

Section 12.08.560 of the County Code prohibits the operation of any device that creates vibration that is above the vibration perception threshold of any individual at or beyond the property boundary of the source if the source is on private property or at 150 feet (46 meters) from the source if on a public space or public right-of-way. According to the County Noise Ordinance, the perception threshold is a motion velocity of 0.01 inch per second (in/sec) over the range of 1 to 100 Hz.

City of Lancaster

The following City of Lancaster regulations are provided for information. For construction noise impacts, the Los Angeles County Code is more restrictive on construction activities and is applied to this analysis. For operational issues, there are no applicable City of Lancaster noise standards.

City of Lancaster Municipal Code

Construction

Per Section 8.24.040 of the City's Municipal Code, a person at any time on Sunday or any day between the hours of 8:00 PM and 7:00 AM shall not perform any construction or repair work of any kind upon any building or structure or perform any earth excavating, filling, or moving where any of the foregoing entails the use of any air compressor; jack hammer; power-driven drill; riveting machine; excavator; diesel-powered truck; tractor or other earth-moving equipment; hard

¹ Noise Zone I, Noise-Sensitive Area, is an area designated by the health officer for the purpose of ensuring exceptional quiet. These areas must be indicated by the display of conspicuous signs in at least 3 separate locations within 164 meters (0.1 mile) of the institution or facility.

hammers on steel or iron or any other machine, tool, device, or equipment which makes loud noises within 500 feet of an occupied dwelling, apartment, hotel, mobile home, or other place of residence (Lancaster 2015).

4.10.2 EXISTING CONDITIONS

Existing Noise Environment

As previously described, while there are no applicable regulations or plans classifying prisons or detention facilities as sensitive noise receptors, these land uses are assumed to be noise sensitive in this EIR.

There are no sensitive receptors on the Project site. The nearest off-site sensitive receptors are residents living in the small apartment complex and other residential uses located west of the Project site on the west side of 60th Street West; the closest sensitive receptors are located approximately 65 feet from the anticipated construction of the access/entrance to the Project site and approximately 0.15-mile from the proposed operations and buildings internal to the site. Other sensitive receptors in the vicinity of the Project site include two residential homes approximately 0.2 mile and 0.32 mile to the north of the Project site boundary; juveniles at the Challenger Memorial Youth Center (CMYC), which is located 0.17-mile east of the Project site boundary; and prisoners at the housing units of the California State Prison, Los Angeles County (CSP-LAC), which is located approximately 0.3 mile south of the Project site.

Current staffing levels on the Project site are minimal, with Los Angeles County Sheriff's Department staff on site daily for security. There is a helipad at the northeast corner of the Mira Loma Detention Center. This helipad is currently used by the Sheriff's Department on a daily basis. Thus, there is occasional noise from helicopter approach and departure. There are no other notable sources of noise on the site.

The primary sources of noise at the Project site are vehicles on 60th Street West and West Avenue I. Existing average daily traffic (ADT) volumes on the roadway segments adjacent to the project site are 5,450 on 60th Street West and 5,975 on West Avenue I; data were taken in the Spring of 2014 (Lancaster 2014). The posted speed limits on 60th Street West and West Avenue I are 55 miles per hour (mph) and 40 to 50 mph, respectively (LLG 2015). Based on speed and volume data, the existing average daytime noise level at 50 feet from 60th Street West is estimated at 66 dBA L_{eq} and the 24-hour noise level is estimated at 68 dBA CNEL. The existing average daytime noise level at 50 feet from West Avenue I is estimated at 65 dBA L_{eq} and the 24-hour noise level is estimated at 67 dBA CNEL.

4.10.3 THRESHOLDS OF SIGNIFICANCE

The following thresholds of significance are derived from the Environmental Checklist in Appendix G of the State CEQA Guidelines. A project would result in a significant adverse impact related to Noise if it would:

Threshold 4.10a: Expose people to or generate noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies.

Threshold 4.10b: Expose people to or generate excessive groundborne vibration or groundborne noise levels.

Threshold 4.10c: Result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project.

Threshold 4.10d: Result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project.

Threshold 4.10e: For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, expose people residing or working in the Project area to excessive noise levels.

Threshold 4.10f: For a project within the vicinity of a private airstrip, expose people residing or working in the project area to excessive noise levels.

4.10.4 PROJECT DESIGN FEATURES

PDF NOI-1 The Contractor's Specifications will require that the Project will use construction vehicles and equipment, either fixed or mobile, that will be equipped with properly operating and maintained mufflers (equivalent or better than original factory equipment), which will be periodically inspected to ensure compliance. Equipment maintenance and staging areas will be located at least 450 feet from residences on 60th Street West.

4.10.5 REGULATORY REQUIREMENTS

RR NOI-1 The Project will be constructed in accordance with Section 12.08.440 of the County Code, which prohibits construction activities that generate noise that could create a disturbance across a residential or commercial property line from occurring between 7:00 PM and 7:00 AM on weekdays, or at any time on Sunday or a federal holiday.

4.10.6 IMPACT ANALYSIS

Threshold 4.10a: **Would the project expose persons to or generate noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?²**

Threshold 4.10d: **Would the project result in a temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?**

Short-Term Construction Impacts

Mobile and Stationary Equipment

This section evaluates temporary noise impacts from construction of the Project to receptors adjacent to or near the Project site. Noise generated by on-site activities is evaluated based on County of Los Angeles noise standards.

Construction noise is related primarily to the use of heavy equipment. Construction equipment can be considered to operate in two modes: stationary and mobile. Stationary equipment operates in one location for one or more days at a time, with either a fixed-power operation (such as pumps,

² The following analysis of Threshold 4.9a focuses on construction noise only. The analysis of operational noise pursuant to Threshold 4.9a is provided later in this section in combination with Threshold 4.9c.

generators, and compressors) or a variable noise operation (such as pile drivers, rock drills, and pavement breakers). Mobile equipment moves around a construction site with power applied in cyclic fashion (such as bulldozers, graders, and loaders).

To determine the L_{eq} of the equipment's operation, the power variation is accounted for by describing the noise at a reference distance from the equipment operating at full power and adjusting it based on the duty cycle of the activity (fraction of time the equipment operates at maximum power). Typical duty cycles and noise levels generated by representative pieces of construction equipment are listed in Table 4.10-5, Typical Maximum Construction Noise Levels.

**TABLE 4.10-5
TYPICAL MAXIMUM CONSTRUCTION NOISE LEVELS**

Equipment	Noise Level (dBA) at 50 ft	Typical Duty Cycle*
Auger Drill Rig	85	20%
Backhoe	80	40%
Blasting	94	1%
Chain Saw	85	20%
Clam Shovel	93	20%
Compactor (ground)	80	20%
Compressor (air)	80	40%
Concrete Mixer Truck	85	40%
Concrete Pump	82	20%
Concrete Saw	90	20%
Crane (mobile or stationary)	85	20%
Dozer	85	40%
Dump Truck	84	40%
Excavator	85	40%
Front-End Loader	80	40%
Generator (25 KVA or less)	70	50%
Generator (more than 25 KVA)	82	50%
Grader	85	40%
Hydra Break Ram	90	10%
In situ Soil Sampling Rig	84	20%
Jackhammer	85	20%
Mounted Impact Hammer (hoe ram)	90	20%
Paver	85	50%
Pile Driver, Impact (diesel or pneumatic)	95	20%
Pile Driver, Vibratory	95	20%
Pneumatic Tools	85	50%
Pumps	77	50%
Rock Drill	85	20%
Scraper	85	40%
Tractor	84	40%
Vacuum Excavator (vac-truck)	85	40%
Vibratory Concrete Mixer	80	20%

dBA: A-weighted decibels; ft: foot/feet; KVA: kilovolt amps
* Typical duty cycle: the typical relationship between the operating and resting time of a motor.
Source: Thalheimer 2000.

Each construction stage has a different equipment mix depending on the work to be accomplished during that stage. Each stage also has its own noise characteristics; some will have higher continuous noise levels than others, and some have high-impact noise levels. The L_{eq} of each stage is determined by combining the L_{eq} contributions from each piece of equipment used in that stage. Typical heavy construction equipment would include bulldozers, excavators, dump trucks, front-end loaders, graders, and industrial/concrete saws. In typical construction projects (such as the proposed Project), demolition and grading activities generate the highest noise levels; demolition usually requires impact equipment such as hoe-rams or jackhammers and grading involves the largest equipment. Construction of the Project involves both demolition and grading. Construction activities associated with the Project would not require blasting or pile driving.

Because of the effects of noise attenuation, the distance from the noise source to a receptor is a primary consideration in determining the noise level experienced at the receptor. The distances and locations of sensitive receptors near the Project site are discussed below. Because different construction stages involve different pieces of equipment and may involve only localized portions of a site, each construction stage can result in different noise levels being generated depending on the relative distance to sensitive receptors.

Construction of the Project is expected to begin in December 2016, with completion by the fourth quarter of 2019. Construction would be limited to the hours of 7:00 AM to 7:00 PM daily, except for any time on Sundays or federal holidays. Therefore, the construction noise standards of the County, which are hours limits (RR NOI-1) would not be exceeded (Threshold 4.10a), and the construction hours would also not exceed the limits of the County noise ordinance.

Mobile Equipment

The closest sensitive receptors to the Project site are the residences on the west side of 60th Street West and opposite the Project site entrance. The closest substantial construction activities (i.e., site preparation, demolition, grading, and paving on a relatively large area) to these receptors would occur at the proposed parking lots at a distance of more than 350 feet from the residences. If it is assumed that a hoe-ram and excavator both operate at full power at a distance of 350 feet from the residences, the maximum noise level would be 75 dBA. However, because equipment cycles from full power to lower power levels and moves around a construction area, the realistic average noise level at the closest receptors from work at the closest parking lot areas is not anticipated to exceed 69 dBA L_{eq} . Project equipment maintenance and staging areas would be located at least 450 feet from residences per PDF NOI-1. PDF NOI-1 also requires that construction equipment would be equipped with properly operating and maintained mufflers to control engine exhaust noise. Project demolition and construction work for the remainder of the site would occur at distances up to 1,600 feet or more from the closest receptors. Therefore, average noise levels at the receptors during the 33-month construction period would be expected to range from less than 60 dBA L_{eq} to 69 dBA L_{eq} . Noise levels would not exceed 75 dBA, which is the most restrictive County daytime mobile equipment noise standard (Threshold 4.10a).

Less substantial construction activities (i.e., shorter in duration and with less equipment) would occur closer to the residences on 60th Street West. These activities would include the installation of a water pipeline extension within 60th Street West and into the Project site and repaving, as needed, of the driveways and access roads from 60th Street West into the Project site. These activities are linear in nature, with equipment near any individual receptor for relatively short periods (i.e., approximately 3 days or less). Noise levels would be similar to typical roadway and utility maintenance work. Hourly noise levels may sometimes exceed 75 dBA L_{eq} at individual residences; however, because work would be adjacent to any one residence for only a short duration of time and in compliance with the time restrictions set forth in RR NOI-1, the noise increase is not considered to be substantial and the impact would be less than significant.

Construction noise levels from less than 60 dBA L_{eq} to 69 dBA L_{eq} at the 60th Street West receptors would equate to less than the average daytime noise level of 66 dBA L_{eq} to 3 dBA greater than the average daytime noise level, respectively. As previously noted, a 3 dBA noise increase is barely perceived by most persons. Further, construction noise levels would likely be less than 66 dBA L_{eq} for most of the construction period because most of the work would occur at distances of 1,000 feet or more from these residences. It is therefore concluded that the temporary increase in ambient noise levels due to on-site construction mobile sources would not be substantial (Threshold 4.10d).

It should be noted that the Design-Build contractor may request an expedited schedule to work on Saturdays and/or to increase the intensity of the daily construction operations through the use of more equipment/workers on-site than anticipated in the Project's proposed schedule (see Section 3.0, Project Description). This request would be considered for the purpose of reducing the duration of the Project construction period. For the purposes of this analysis, and to provide a conservative assessment of possible noise intensity, construction equipment was assumed to be double what is assumed under the typical construction scenario. A potential doubling of the intensity of construction activities could increase the noise levels at sensitive receptors by up to 3 dBA, to a maximum of 72 dBA L_{eq} . If this increase occurred, the maximum noise levels would remain below the 75 dBA threshold and the noise increase, while more perceptible, would not be significant or require any additional mitigation. MM NOI-1 would still be applicable.

Stationary Equipment

Stationary noise sources associated with Project construction would include air compressors, generators, and cranes. As shown on Table 4.10-5, the maximum noise levels from operation of a generator at 50 feet are approximately 82 dBA with a load factor of 50 percent. The most restrictive County daytime stationary equipment noise standard is 60 dBA. The noise level from a generator would not exceed 60 dBA L_{eq} at distances of 450 feet. Project construction that would occur within 450 feet of the receptors on 60th Street West would not be anticipated to use a generator or other stationary piece of diesel equipment. However, to limit stationary source noise to less than the County noise ordinance limit, MM NOI-1 would be incorporated into the Project. MM NOI-1 would require stationary equipment to operate at a distance of greater than 450 feet or provide an enclosure or similar noise attenuation to limit the average hourly daytime noise level to 60 dBA or less. With the incorporation of MM NOI-1, the temporary increase in ambient noise levels due to on-site construction stationary sources would be less than significant (Threshold 4.10d).

Construction Traffic (Off-Site)

During construction, noise would be generated on local roadways by heavy trucks removing demolished buildings and pavement, construction material deliveries, and workers commuting to and from the job site. During the 2-month demolition period, there would be an average of 18 to 20 one-way haul truck trips per weekday to remove debris from the site. During the building construction period, it is estimated that an average of 60 workers per weekday would be required and 20 one-way truck trips to and from the site would be necessary to provide construction materials. If it assumed that the peak truck trip rate would be 5 trips and 30 worker trips in 1 hour and that all trips would use 60th Street West, the average daytime hourly average noise level would increase by less than 1 dBA, which would not be perceptible.

As described above, the Design-Build contractor may request an expedited schedule to work on Saturdays and/or to increase the intensity of the daily construction operations through the use of more equipment/workers on-site than anticipated in the Project's proposed schedule (see Section 3.0, Project Description). This change in the intensity of daily construction activities would

increase the frequency of off-site construction traffic. By conservatively doubling construction traffic, the peak truck trip rate would be 10 truck trips and 60 worker trips in 1 hour and the average daytime hourly average noise level would increase by approximately 1.5 dBA. The increased daytime noise level would still not be perceptible. Therefore, the temporary increase in ambient noise levels due to off-site construction traffic would not be significant or require any additional mitigation (Threshold 4.10d). MM NOI-1 would still be applicable.

Both on-site, with the incorporation of MM NOI-1, and off-site construction activities would not exceed County noise standards and would not result in a substantial temporary increase in ambient noise levels and the impact would be less than significant.

Threshold 4.10a: **Would the project expose persons to or generate noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?**³

Threshold 4.10c: **Would the project result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?**

Long-Term Operational Impacts

On-Site Noise Levels

As described above, the existing 24-hour noise level at 50 feet from 60th Street West is estimated at 68 dBA CNEL and the existing 24-hour noise level at 50 feet from West Avenue I is estimated at 67 dBA CNEL. The nearest on-site sensitive receptor to 60th Street West would be Building 22 (the orientation barracks), which would be approximately 1,000 feet from 60th Street West. Over that distance, the traffic noise level with the Project would be reduced by at least 13 dBA, without assuming attenuation by intervening structures or soft terrain. Therefore, exterior noise levels would be less than 55 dBA CNEL. The nearest on-site sensitive receptor to West Avenue I would be Building E (barracks), which would be approximately 500 feet from West Avenue I. Over that distance, the traffic noise level with the Project would be reduced by at least 10 dBA, without assuming attenuation by intervening structures or soft terrain. Therefore, exterior noise levels would be less than 57 dBA CNEL.

Typical building construction reduces exterior-to-interior noise levels by at least 12 dBA with windows open and by 20 dBA with windows closed. Therefore, interior noise levels would not exceed 45 dBA CNEL. Future traffic noise levels at on-site sensitive receptors would be within the "Normally Acceptable" range in the County standards (see Table 4.10-4). Building 22 and Building E are existing barracks and therefore not required to be designed to meet the State noise standard for new construction; however, it is noted that interior noise levels at these buildings would not exceed the 45 dBA CNEL of the California Building Code. New barracks Buildings G and H would be located further from the roads than Buildings 22 and E; exterior noise levels at these new buildings would not exceed 57 dBA CNEL and interior noise levels would comply with the California Building Code (Threshold 4.10a).

Project-Related Traffic Noise Levels

The Traffic Impact Analysis (LLG 2015) estimates that the Project would generate 980 ADT on weekdays. This ADT is used in the analysis below and not the passenger car equivalent (PCE) trips. Based on the Traffic Impact Analysis, it is estimated that 80 percent of the trips would access

³ The following analysis of Threshold 4.10a focuses on operational noise only. The analysis of construction noise pursuant to Threshold 4.10a is provided above in combination with Threshold 4.10d.

the site on 60th Street West and 20 percent of the trips would access the site on West Avenue I. Further, it is estimated that on 60th Street West approximately 60 percent of the total ADT would come from and go to the north (towards West Avenue I) and 20 percent of the total ADT would come from and go to the south (towards West Avenue J). However, for purposes of this analysis it is conservatively assumed that some residences on 60th Street West would be exposed to all traffic using 60th Street West (80 percent), or 784 ADT. When added to existing traffic volumes, the noise level would increase by less than 1 dBA. Therefore, the change in weekday traffic noise would not be perceptible to human hearing and, accordingly, not considered substantial.

It is estimated that visitor trips would generate an additional 474 ADT on weekend days and that all of these trips would access the site from 60th Street West (LLG 2015). It is also conservatively assumed that some residences on 60th Street West would be exposed to all Project-generated traffic using 60th Street West, or 1,258 ADT. When added to existing traffic volumes, the noise level would increase by less than 1 dBA, which would not be perceptible by most persons and would not be considered significant. It should also be noted that the increased weekend traffic would occur entirely in the daytime hours.

When Project-generated traffic is compared to future traffic volumes, the noise impact of the Project-generated traffic would be less than calculated in the Traffic Impact Analysis for the existing plus Project condition because future without-Project traffic volumes would be greater than existing traffic volumes and the Project-generated fraction would be smaller. Therefore, the change in traffic noise would not be perceptible.

The permanent noise increases resulting from Project-generated traffic would not be substantial. The impact would be less than significant and no mitigation is required (Threshold 4.10c).

Noise from On-Site Operations

Operational noise sources associated with the Project would include, but not be limited to, mechanical equipment (e.g., HVAC units); landscape maintenance equipment; vehicles entering and leaving the site; trash disposal; and a public address system. HVAC equipment could be expected to operate continuously during daytime and nighttime. Large commercial HVAC equipment (20 tons, for example) generate noise levels of approximately 59 dBA at 60 feet without considering noise reductions from parapets, screening, soft terrain, and the barrier effects of rooftop installation or intervening buildings. As discussed in Section 4.10.2, the closest sensitive receptors are located approximately 0.15-mile (790 feet) from the proposed operations and buildings internal to the site. At this distance, without the noise attenuation effect described above, noise from one HVAC unit would be less than 37 dBA Leq at the property line. Considering multiple HVAC units and additional noise attenuation that would exist, the combined noise levels would not exceed the 45 dBA Leq nighttime noise ordinance limit at residential receptors (Table 4.10-4).

Noise from driveway access, loading and unloading, trash disposal, and landscape maintenance would occur intermittently and would not be anticipated to exceed the noise ordinance limits, which allow noise events to exceed the continuous noise limits when noise events occur for less than 30 minutes in an hour. The public address (PA) system would not be used for routine communications within the MLWDC. Use of the public address system would be limited to emergencies and would therefore occur only occasionally, as discussed in Section 3.0, Project Description. Noise impacts from on-site sources would be less than significant; no mitigation is required.

Threshold 4.10b: Would the project expose persons to or generate excessive groundborne vibration or groundborne noise levels?

Short-Term Construction Impacts

Groundborne vibration generated by construction projects is usually highest during pile driving, soil compacting, jack-hammering, and demolition-related activities. Pile driving and blasting would not be required for construction of the proposed Project. However, the Project would require demolition activities on the site. Next to demolition, grading activities have the greatest potential for vibration impacts as the largest and heaviest equipment would be used during this stage. Table 4.10-6, Vibration Levels During Construction, summarizes typical vibration levels measured during construction activities for various vibration-inducing pieces of equipment at a distance of 25 feet, and the calculation of these levels at a distance of 10 feet. A distance of 10 feet was selected because it is possible that heavy construction would occur within 10 feet of existing buildings.

**TABLE 4.10-6
VIBRATIONS LEVELS DURING CONSTRUCTION**

Equipment	ppv at 25 ft (in/sec)	ppv at 10 ft (in/sec)
Large bulldozer	0.089	0.24
Caisson drilling	0.089	0.24
Loaded trucks	0.076	0.21
Jackhammer	0.035	0.096
Small bulldozer	0.003	0.008
ppv: peak particle velocity; in/sec: inch(es) per second; ft: feet		
Source: FTA 2006.		

There are no County or City standards for structural damage from vibration. The California Department of Transportation (Caltrans) vibration damage potential threshold guidelines are shown in Table 4.10-7, Guideline Vibration Damage Potential Threshold Criteria.

**TABLE 4.10-7
GUIDELINE VIBRATION DAMAGE POTENTIAL THRESHOLD CRITERIA**

Structure and Condition	Maximum ppv (in/sec)	
	Transient Sources	Continuous/Frequent Intermittent Sources
Extremely fragile historic buildings, ruins, ancient monuments	0.12	0.08
Fragile buildings	0.2	0.1
Historic and some old buildings	0.5	0.25
Older residential structures	0.5	0.3
New residential structures	1.0	0.5
Modern industrial/commercial buildings	2.0	0.5
ppv: peak particle velocity; in/sec: inch(es) per second		
Note: Transient sources create a single isolated vibration event, such as blasting or drop balls. Continuous/frequent intermittent sources include impact pile drivers, pogo-stick compactors, crack-and-seat equipment, vibratory pile drivers, and vibratory compaction equipment.		
Source: Caltrans 2013b.		

While Table 4.10-7 does not include institutional structures, such as the proposed Project, the highest potential vibration level at 10 feet shown in Table 4.10-6, 0.24 ppv in/sec, would be less than the structural damage guidelines for "Historic and some old buildings" in Table 4.10-7 of 0.25 ppv in/sec. With respect to structural integrity and resistance to damage from vibration, the existing on-site buildings adjacent to Project's construction activities (e.g., hangars; see Exhibit 2-3 in Section 2.0) are as substantial or more substantial than buildings in the "Historic and some old buildings" classification as they are largely constructed of concrete block. Therefore, it is concluded that there would be no potential for structural damage to existing structures on the Project site. There would be no impact and no mitigation is required.

The Project site would be unoccupied during construction. There would be no potential for human annoyance due to vibration.

Long-Term Operational Impacts

There would be no operational activities with the potential to cause vibration impacts.

Threshold 4.10e: For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the Project expose people residing or working in the Project area to excessive noise levels?

Short-Term and Long-Term Impacts

The nearest airport to the site is the General William J. Fox Airfield, which is located 2.3 miles north of the site. This general aviation airport is owned by the County of Los Angeles and serves as a flight training facility for aircraft and pilots from the Los Angeles Basin and as an air attack base for U.S. Forest Service firefighting aircraft (ALUC 2004). This airport has 154 based aircraft and an average of 224 aircraft operations per day (AirNav 2015b). The airport also hosts an annual air show that has featured the U.S. Navy Blue Angels and U.S. Air Force Thunderbirds (County of Los Angeles 2015a).

The *General William J. Fox Airfield Master Plan Update* was prepared in 2013 and is a long-range 20-year planning document (County of Los Angeles 2013). The environmental noise evaluation in the Master Plan Update states the following:

Based on the anticipated increase in aircraft activity at Fox Airfield, aircraft noise has the potential to increase over the 20-year planning period. To determine the level of noise predicated over the planning period, the FAA's [Federal Aviation Administration's] Integrated Noise Model (INM) version 7.01 (b) was used to model Community Noise Exposure Levels (CNEL) for the 5-, 10- and 20-year time periods. The decibel levels used for this noise analysis include the 55, 60 and 65 CNEL . . . The 65 CNEL noise contour remains on airport owned property for Alternatives A, B and C. Alternative D assumes commuter/on-demand service does not develop during the planning period; therefore, the noise contours also remain on airport property.

Because the 65 dBA CNEL noise contour would be more than 2 miles from the Project site, staff, inmates, and visitors would not be exposed to excessive noise levels. The impact would be less than significant; no mitigation is required.

Threshold 4.10f: For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?

The nearest private airstrip to the Project site is Bohunk's Airpark, which is located approximately 2 miles west of the site. There are 20 single-engine airplanes and 1 helicopter based at the airport (AirNav 2015a). There are no published noise contours for Bohunk's Airpark; however, considering the distance from the Project site and the low number of based aircraft, it is concluded that staff, inmates, and visitors would not be exposed to excessive noise levels. The impact would be less than significant; no mitigation is required.

The existing helipad landing area at the northeast corner of the Mira Loma Detention Center is approximately 175 feet from Barracks E. Barracks F is approximately 275 feet from the landing area and the proposed Barracks G would be approximately 400 feet from the landing area. This helipad is currently used by the Sheriff's Department and would continue to be used on a daily basis. It is assumed that normal helicopter operations at the helipad would occur during daylight hours and would not cause any sleep disturbance. While approaches and departures would be heard by staff, inmates, and visitors at the facility, the daytime occurrence of occasional helicopter operations would not be considered excessive noise exposure. The impact would be less than significant; no mitigation is required.

4.10.7 CUMULATIVE IMPACTS

This section provides an analysis of cumulative impacts from construction and operation of the Project and other past, present, and reasonably foreseeable future projects, consistent with Section 15130 of the State CEQA Guidelines. The past, present, and reasonably foreseeable future projects (i.e., related projects) used for this analysis are presented in Section 2.4, Cumulative Projects, of this EIR. Because noise is attenuated over distance, and point source noise would be attenuated by approximately 30 dBA over a distance of ¼ mile, the study area for cumulative impacts related to noise generated on the Project site is within ¼ mile (1,320 feet) of the Project site.

Construction Activities

Noise and vibration impacts during Project construction would be localized and would occur intermittently for varying time periods throughout the construction period. Short-term cumulative impacts related to ambient noise levels could occur if construction associated with the Project as well as surrounding current and future development were to occur simultaneously. Based on the data in Section 2.4 of this EIR, the closest potentially cumulative projects are more than ½ mile to the south and more than ½ mile to the east of the Project site. Due to distance between these sites and the Project site, the Project would not contribute to cumulative noise levels and impacts would be less than significant.

Operational Activities

Operational cumulative noise impacts describe how much noise levels are anticipated to increase over existing conditions due to traffic associated with the development of the Project and all other future traffic growth. The analysis of potential traffic-related noise impacts presented above was based on the Traffic Impact Analysis prepared for the proposed Project. The Future with Project Conditions scenario from the Traffic Impact Analysis includes cumulative traffic due to the combined effects of continuing development and ambient growth (LLG 2015). As discussed above, the change in traffic noise in the future conditions scenario would not be perceptible.

Therefore, the cumulative operational impact would not be cumulatively considerable and no mitigation is required.

4.10.8 MITIGATION MEASURES

MM NOI-1 The County of Los Angeles Department of Public Works shall include the following requirement in the Contractor's Specifications:

Stationary equipment, such as generators and air compressors, shall be located at least 450 feet from the residences on 60th Street West opposite the Project site. If stationary equipment use is required to be closer than 450 feet, the equipment shall include an enclosure or similar noise attenuation if needed to limit the average hourly daytime noise level at the nearest residential property line to 60 A-weighted decibels (dBA) or less. Proof of compliance, such as noise measurements during construction activities, shall be provided to the County of Los Angeles Department of Public Works within one week of the start of use of stationary equipment within 450 feet of a residence.

4.10.9 LEVEL OF SIGNIFICANCE AFTER MITIGATION

With incorporation of MM NOI-1, there would be less than significant impacts related to construction noise at the nearest and all other off-site receptors. There would be no significant unavoidable or cumulative impacts related to noise; therefore, mitigation is not required.

4.10.10 REFERENCES

- AirNav, LLC (AirNav). 2015a (April 30, FAA information effective date). OCL6: Bohunk's Airpark, Lancaster, California, USA. Atlanta, GA: AirNav. <http://www.airnav.com/airport/OCL6>.
- . 2015b (April 30, FAA information effective date). KWJF: General Wm J Fox Airfield, Lancaster, California, USA. Atlanta, GA: AirNav. <http://www.airnav.com/airport/KWJF>.
- California Building Standards Commission (CBSC). 2015. Supplement to Part 2, California Building Code, Volume 1. Sacramento, CA: CBSC. <http://www.bsc.ca.gov/Home/Current2013Codes.aspx>.
- California Department of Transportation (Caltrans). 2013a (September) *Technical Noise Supplement to the Traffic Noise Analysis Protocol*. Sacramento, CA: Caltrans. http://www.dot.ca.gov/hq/env/noise/pub/TeNS_Sept_2013A.pdf.
- . 2013b (September) *Transportation and Construction Vibration Guidance Manual*. Sacramento, CA: Caltrans. http://www.dot.ca.gov/hq/env/noise/pub/TCVGM_Sep13_FINAL.pdf.
- California, State of, Governor's Office of Planning and Research (OPR). 2003 (October). *State of California General Plan Guidelines*. Sacramento, CA: OPR.
- Lancaster, City of. 2015 (May, last updated). *Lancaster, California – Code of Ordinances*. Tallahassee, FL: Municode Corporation for the City. https://www.municode.com/library/ca/lancaster/codes/code_of_ordinances?nodeId=16042.

-
- . 2014 (January 6, last updated). City of Lancaster, Traffic Engineering (Average Daily Traffic Map). Lancaster, CA: the City. <http://www.cityoflancafterca.org/index.aspx?page=407>.
- Linscott, Law & Greenspan, Engineers (LLG). 2015 (April 28). *Traffic Impact Study, Mira Loma Detention Center Women's Facility Project, City of Lancaster, California*. Pasadena Hills, CA: LLG.
- Los Angeles, County of. 2015a (accessed March 2). Los Angeles County Airports, General Wm. J. Fox Airfield. Alhambra, CA: the County, Department of Public Works. <http://dpw.lacounty.gov/avi/airports/GeneralWMJFox.aspx>.
- . 2015b (last update). *Los Angeles County, California – Code of Ordinances*. Tallahassee, FL: Municode Corporation for the County. <https://library.municode.com/index.aspx?clientId=16274>.
- . 2015c (March). Los Angeles County General Plan 2035: Draft General Plan 2015. Los Angeles, CA: the County. <http://planning.lacounty.gov/generalplan/draft>.
- . 2015d (March). Los Angeles County General Plan 2035: General Plan Update Program - CEQA. Los Angeles, CA: LACDRP. <http://planning.lacounty.gov/generalplan/ceqa>.
- . 2013 (August). *General William J. Fox Airfield Master Plan Update, Lancaster, California*. Alhambra, CA: the County, Department of Public Works. http://dpw.lacounty.gov/avi/airports/documents/GeneralWMJFox_MP.pdf.
- Los Angeles County Airport Land Use Commission (ALUC). 2004 (December). *General William J. Fox Airfield Land Use Compatibility Plan*. Los Angeles, CA: Los Angeles County ALUC. http://planning.lacounty.gov/assets/upl/project/aluc_fox-lucp.pdf.
- Thalheimer, E. 2000. Construction Noise Control Program and Mitigation Strategy as the Central Artery/Tunnel Project. *Noise Control Engineering Journal* 48(5), Sep–Oct. Indianapolis, IN: Institute of Noise Control Engineering.
- U.S. Department of Transportation, Federal Transit Administration (FTA). 2006 (May). *Transit Noise and Vibration Impact Assessment, FTA-VA-90-1003-06* (prepared by Harris Miller Miller & Hanson, Inc.). Vienna, VA: HMMH. http://www.fta.dot.gov/documents/FTA_Noise_and_Vibration_Manual.pdf.

4.11 POPULATION AND HOUSING

This section looks at changes in population, housing, and employment that would occur with implementation of the proposed MLWDC Project. This section addresses the existing population, housing, and employment conditions in the City of Lancaster (City), as well as estimated population growth and trends related to future housing and employment. The environmental effects of increased population, housing, and employment on factors such as traffic, air quality, and noise are addressed in their respective sections of this EIR.

Information below is derived from California Department of Finance (DOF) estimates of population and housing as of January 1, 2015; California Employment Development Department (EDD) unemployment rates for March 2015; and the Southern California Association of Governments' (SCAG's) 2012 Integrated Growth Forecast for the City of Lancaster. It also includes information from the Los Angeles County Department of Public Works on the existing employment and prison population that would be affected by the Project.

4.11.1 RELEVANT PROGRAMS AND REGULATIONS

There are no federal, State, County or local programs or regulations that relate to detention centers and their impacts on population, housing, and employment.

4.11.2 EXISTING CONDITIONS

Population

Regional Population

Los Angeles County had a January 2015 population of 10,136,559 persons, of which 1,051,872 persons (or 10.38 percent) were in unincorporated areas and the rest in incorporated cities (DOF 2015). Table 4.11-1 presents recent trends in the County's population growth. Population growth rates have been less than 1.0 percent since 2010, with persons in group quarters, which includes prisons, jails, dormitories, convalescent homes, group homes (a residential facility that provides 24-hour care and supervision to children), and other similar facilities, making up 1.77 to 1.80 percent of the total County population.

**TABLE 4.11-1
COUNTY OF LOS ANGELES POPULATION GROWTH 2010–2015**

Year	Countywide Residents		Residence in Group Quarters		
	Total Residents	Annual Percentage Change	Residents in Group Quarters	Annual Percentage Change	Percent of Population
2010	9,818,605	–	175,292	–	1.79%
2011	9,847,712	0.30%	173,916	-0.78%	1.77%
2012	9,908,030	0.61%	175,935	1.16%	1.78%
2013	9,980,432	0.73%	179,463	2.01%	1.80%
2014	10,054,852	0.75%	181,405	1.08%	1.80%
2015	10,136,559	0.81%	182,164	0.42%	1.80%

Source: DOF 2015.

The County estimated the Antelope Valley area population at 382,973 persons in 2010 (County of Los Angeles 2014). By 2014, the Greater Antelope Valley area, which includes the cities of Lancaster and Palmdale in Los Angeles County, the cities of Tehachapi, Ridgecrest and California City in Kern County, and adjacent unincorporated areas, was estimated to have a resident population of 520,690 persons, of which 403,565 persons were in the Los Angeles County portion (GAVEA 2014).

In 2008, the estimated population of the entire Santa Clarita Valley was 252,000 persons, with 75,000 persons in the unincorporated County areas and the remainder residing within the City of Santa Clarita (County of Los Angeles 2010).

Local Population

The City of Lancaster had a January 2015 population of 160,784 persons. Of the total resident population, 7,260 persons (i.e., 4.52 percent) live in group quarters. Table 4.11-2 presents recent trends in the City's population growth. As shown, the City's resident population has been increasing since 2010, but the number of persons in group quarters has been decreasing.

**TABLE 4.11-2
CITY OF LANCASTER POPULATION GROWTH 2010–2015**

Year	Citywide Residents		Residence in Group Quarters		
	Total Residents	Annual Percentage Change	Residents in Group Quarters	Annual Percentage Change	Percent of Population
2010	156,633	–	8,259	–	5.27%
2011	157,624	0.63%	8,190	-0.84%	5.20%
2012	158,158	0.34%	7,609	-7.09%	4.81%
2013	158,909	0.47%	7,488	-1.59%	4.71%
2014	159,956	0.66%	7,441	-0.63%	4.65%
2015	160,784	0.52%	7,260	-2.43%	4.52%

Source: DOF 2015.

Group quarters include detention centers which, in Lancaster, include the MLDC, the California State Prison to the south of the site, and the Challenger Memorial Youth Center to the east. The MLDC was designed to accommodate 1,040 inmates, but does not currently house inmates. The California State Prison has a design capacity of 2,300 beds and, in September 2014, had 3,571 inmates (CDCR 2014). The Challenger Memorial Youth Center has 660 beds (Lancaster 2009b).

The decrease in persons in group quarters in 2012 could be, in part, due to the closure of the Mira Loma Detention Center in 2012, when the U.S. Immigration and Customs Enforcement (ICE) terminated their contract with the County and ceased to house illegal immigrants at the facility.

Housing

Regional Housing

The County's 2015 housing stock consists of 3,487,434 dwelling units. This includes 1,721,724 single-family detached units; 229,854 single-family attached units; 285,395 units in two- to four-unit developments; 1,192,188 units in developments with five units or more; and 58,273 mobile homes. Some 202,274 units (5.8 percent) were vacant and the average household size was 3.03 persons per household (DOF 2015).

In 2006, the Antelope Valley Area had 90,081 housing units (County of Los Angeles 2014). There were 158,996 housing units in the Greater Antelope Valley area in 2014, with a vacancy rate of 9.34 percent and an average household size of 3.17 persons per household (GAVEA 2014).

As of 2008, there were approximately 80,000 dwelling units in the Santa Clarita Valley, of which 23,000 units were in the unincorporated areas and 57,000 units were within the City of Santa Clarita (County of Los Angeles 2010).

Local Housing

The City of Lancaster's 2015 housing stock consists of 52,636 dwelling units. This includes 36,908 single-family detached units; 832 single-family attached units; 3,090 units in two to four-unit developments; 7,880 units in developments with five units or more; and 3,926 mobile homes. Some 4,912 units (9.3 percent) were vacant and the average household size was 3.22 persons per household (DOF 2015).

Employment

Regional Employment

According to the California Employment Development Department (EDD), Los Angeles County's labor force consisted of 5.044 million persons in March 2015, of which 4.679 million persons were employed and 365,100 persons were unemployed. This translates to the County's unemployment rate of 7.2 percent (EDD 2015).

SCAG estimates for the number of jobs in the County are included in Table 4.11-3. This shows the loss of jobs during the economic recession during the late 2000s and subsequent job growth since 2010.

**TABLE 4.11-3
COUNTY EMPLOYMENT GROWTH 2007–2012**

Year	County of Los Angeles	
	Total Jobs	Percent Increase
2007	4,520,583	–
2008	4,460,042	-1.36%
2009	4,187,412	-6.51%
2010	4,130,998	-1.37%
2011	4,154,603	0.57%
2012	4,209,116	1.30%

Source: SCAG 2013b

In 2013, the County estimated that there were 31,838 jobs in the Antelope Valley, comprising 0.7 percent of the County's total employment base of 4.506 million jobs (County of Los Angeles 2014).

In 2005, the Santa Clarita Valley had 124,200 jobs, of which 49,311 jobs (approximately 40 percent) were located in the unincorporated areas, primarily west of Interstate 5, and 74,889 jobs were located within the City of Santa Clarita (County of Los Angeles 2010).

Local Employment

Since the ICE operations at the MLDC ceased in 2012, there are no detainees residing at the facility, and ICE staffing levels have been reduced accordingly. The Los Angeles County Sheriff's Department maintains a staff presence on site daily for security, and the County Internal Services Department maintains a staff presence on site daily for maintenance and landscaping activities.

According to the EDD, Lancaster's labor force consisted of 64,200 persons in March 2015, of which 59,000 persons were employed and 5,200 persons were unemployed. This translates to the City's unemployment rate of 8.1 percent, which is higher than the Countywide unemployment rate of 7.2 percent for the same time period (EDD 2015).

Approximately 25.73 percent of local residents (9,909 residents) worked in the City in 2010, with 74.27 percent commuting to other cities and counties. SCAG estimates the number of jobs based in the City in Table 4.11-4. Comparison of residents working in and outside Lancaster shows that many of the City's jobs are filled by persons living outside the City.

**TABLE 4.11-4
LANCASTER EMPLOYMENT GROWTH 2007–2012**

Year	City of Lancaster	
	Total Jobs	Percent Increase
2007	51,422	–
2008	51,117	-0.60%
2009	48,777	-4.80%
2010	48,121	-1.36%
2011	48,261	0.29%
2012	48,814	1.13%

Source: SCAG 2013a

Jobs/Housing Relationship

The relationship between the employment rate and the availability of housing in an area is an important indicator of whether the area has the appropriate mix of land uses. A “balanced” community would be one where people can both live and work. The ratio of jobs to housing is generally measured in terms of the proportion of jobs per household (i.e., employment opportunities compared to workforce population). An ideal balance would be when the jobs/housing ratio is equal, but a broader range for an area with a good balance of jobs to housing would be in the range of 0.8 to 1.2 jobs per household (Cervero and Duncan 2006). A region with too many jobs when compared to employed residents may result in a lack of affordable housing options and increased home prices, potentially resulting in the “importing” of workers. When workers from outside the area are encouraged to travel to take advantage of employment opportunities, the number of vehicle miles traveled (VMT) increases, resulting in increased traffic congestion and increased air pollution from vehicles.

The latest available data on jobs and housing in the County of Los Angeles and the City of Lancaster is provided in Table 4.11-5 below. As shown, the Los Angeles County area has a jobs/housing ratio of 1.22 jobs per housing unit, with Lancaster having 0.93 job per housing unit.

**TABLE 4.11-5
JOBS HOUSING RATIOS (2012)**

	Total Jobs	Total Housing	Jobs/Housing Ratio
Los Angeles County	4,209,116	3,454,093	1.218588
Lancaster	48,814	52,285	0.933614
Source: DOF 2015; SCAG 2013a, 2013b.			

Growth Projections

Growth projections for individual cities and counties have been prepared by SCAG as part of its regional planning efforts for the development of the Regional Comprehensive Plan (RCP), Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), and the Regional Housing Needs Assessment (RHNA). Table 4.11-6 presents the growth projections for Lancaster.

**TABLE 4.11-6
GROWTH PROJECTIONS**

	Year		
	2008	2020	2035
SCAG Region			
Population	17,895,000	19,663,000	22,091,000
Increase	–	1,768,000	2,428,000
Households	5,814,000	6,458,000	7,325,000
Increase	–	644,000	867,000
Employment	7,738,000	8,414,000	9,441,000
Increase	–	676,000	1,027,000
Los Angeles County			
Population	9,778,000	10,404,000	11,353,000
Increase	–	626,000	949,000
Households	3,228,000	3,513,000	3,852,000
Increase	–	285,000	339,000
Employment	4,340,000	4,558,000	4,827,000
Increase	–	218,000	269,000
North Los Angeles County*			
Population	651,929	787,438	946,557
Increase	–	135,509	159,119
Households	200,636	251,558	304,241
Increase	–	50,922	52,683
Employment	213,899	264,354	321,743
Increase	–	50,455	57,389
Lancaster			
Population	154,500	174,800	201,300
Increase	–	20,300	26,500
Households	46,300	52,200	58,800
Increase	–	5,900	6,600
Employment	49,700	51,900	54,200
Increase	–	2,200	2,300
* includes the Antelope Valley and Santa Clarita area.			
Source: SCAG 2012a.			

Future jobs/housing ratios based on the growth projections above are shown in Table 4.11-7.

**TABLE 4.11-7
PROJECTED JOBS/HOUSING RATIO**

	Jobs/Housing Ratio	
	2020	2035
SCAG Region	1.302880	1.288874
Los Angeles County	1.297467	1.253115
North Los Angeles County*	1.050867	1.057527
Lancaster	0.994253	0.921769
* includes the Antelope Valley and Santa Clarita area.		
Source: SCAG 2013a.		

4.11.3 THRESHOLDS OF SIGNIFICANCE

The following significance criteria are derived from the Environmental Checklist in Appendix G of the State CEQA Guidelines. A project would result in a significant adverse impact related to Population and Housing if it would:

- Threshold 4.11a:** Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure).
- Threshold 4.11b:** Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere.
- Threshold 4.11c:** Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere.

4.11.4 ENVIRONMENTAL IMPACT ANALYSIS

Threshold 4.11a: Would the project induce substantial population growth in an area, either directly (for example, by proposed new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

Short-Term Construction Impacts

Construction activities at the site would lead to the temporary presence of construction crews. These crews may come from the Antelope Valley area or other areas of the County or the surrounding regions, depending on selected contractors and skills and trades needed. Because construction jobs are in various and ever-changing locations, the construction contractors will travel to where the jobs are located. Beneficial impacts on employment, although short-term, would occur in the region.

Also, although construction activities would occur at the Project site for approximately 35 months, each phase of construction would require a specific skill set that would be required for a much shorter duration (e.g., grading, building construction, utility installation, interior finishing), and the short-term nature of the construction activity would not be of sufficient duration to encourage new

residents to move into the Project area. As such, construction activities are not expected to create a demand for housing due to the short-term nature of employment for each trade at the site.

Demand for goods and services (e.g., food, gasoline) by the construction crews would be limited, but would likely come from local businesses in the area. Therefore, it is possible that increased construction activities would have a positive increase on sales/revenue for existing local businesses. Project-related construction demands for goods and services would occur for 35 months but this new demand is not expected to indirectly induce substantial population growth since demand will vary at each construction phase and will cease upon completion of construction activities. In summary, construction activities are not expected to induce population growth in the area, nor would construction activities permanently change population, housing, or employment in the City.

Long-Term Operational Impacts

Inmate-Related Population, Housing, and Employment

Long-term operation of the Project would increase the number of persons living in group quarters in the City of Lancaster by 1,604 persons (i.e., MLWDC inmate capacity). This population increase would be due to the housing of female inmates sent to County jail at the renovated Project site. This increase in the local population would represent a 1.0 percent increase in the City's 2015 population of 160,784 residents and would not be considered substantial population growth. No exceedance of the City's population growth projections (estimated at 174,800 residents by 2020 and 201,300 residents by 2035) would occur.

The increase in the number of persons in group quarters in the City of Lancaster of 1,604 persons would have no direct effect on the local housing availability because the female inmates would all be located within the MLWDC and would create no new direct demand for housing.

The increase in the number of persons in group quarters in the City of Lancaster of 1,604 persons would have no direct effect on local employment because they are incarcerated and not a part of the City's available workforce. This increase in the local resident population would not directly lead to a demand for new housing or business growth in the surrounding area since the Project's inmates would not have access to goods and services in the community.

However, the visitors of these inmates may create a demand for goods or services in areas adjacent to the site and in the City and surrounding areas. Visitation hours at MLWDC would be on weekends and designated holidays only. Contact visitation would be permitted for qualifying inmates only and would be available during the dayshift hours of 8:00 AM through 6:00 PM on Saturdays, Sundays, and designated holidays. All inmate visitations must be scheduled in advance and would be limited to available appointment times and dates. Increased weekend and holiday demands for local goods and services that would be generated by visitors would have beneficial economic impacts on area businesses but are not expected to be substantial enough to indirectly increase business ventures and employment and is not expected to cause a substantial growth in population since visitation would be capped at 30-minute or 1-hour increments throughout the day.

With 40 visiting booths, 16 appointment times per day, and a maximum of 3 visitors per appointment, as many as 1,920 visitors per day may come at staggered times to the site on weekends and holidays. It is anticipated that existing commercial uses in the Antelope Valley would be able to meet the demand for goods and services from these visitors.

In 2014, the County's female inmate population consisted of approximately 2,300 inmates, 30 percent of whom were sentenced under AB 109 and met the security qualifications as low- to medium-security level inmates with no special medical or mental health needs. The remaining 70 percent of the female inmate population were awaiting court sentences (at the pre-trial phase) and eventual transfers (County of Los Angeles 2013). Based on information from the Sheriff's Department, the average length of stay for female inmates sentenced under AB 109 (State Re-alignment) was 380 days and female inmates awaiting court sentences have an average stay of 87 days. Thus, it is anticipated that and same 30 percent of the 1,604 inmates (481 inmates) at the MLWDC would be housed at the facility for an average of 380 days and 70 percent (1,123 inmates) would be housed at the MLWDC for 87 days.

For comparison, the California State Prison, which is adjacent to the Project site and had 3,571 inmates as of September 2014, contains high-security prisoners that may be at the State Prison for numerous years or even with life-sentences. It is possible that, due to the long-term incarceration at the State Prison, the families of these prisoners may relocate to the Lancaster area in order to be closer for the convenience of regular visitations. However, due to the relatively short duration of time that inmates would be located at MLWDC, family relocation is anticipated to be minimal.

If the visiting families of the inmates choose to relocate to the Lancaster area, it would indirectly create demands for housing, goods and services, and public services in the surrounding area. While specific estimates of this visiting family relocation cannot be readily made, it is expected that the demand for housing could be met by the 4,912 vacant housing units in the City as of January 2015 (DOF 2015). Future housing demand could also be met by future housing units that could be built on the City's vacant residential-zoned land (9,620 acres), as called out in its 2013 Housing Element of the Lancaster General Plan (Lancaster 2013). Thus, potential increases in population that may indirectly accompany the Project can be served by available housing units or future housing development that has been accounted by the City in its General Plan and, thus, would not be considered substantial housing growth over the City's 2015 housing stock of 52,636 dwelling units. Also, no exceedance of the City's household growth projections (estimated at 58,800 households by 2035) would occur. As such, the long-term presence of inmates at the MLWDC is not expected to induce substantial direct or indirect impacts on population growth.

Upon release from the MLWDC at the Inmate Reception Center (IRC) located in downtown Los Angeles, former inmates are anticipated to return to their previous neighborhoods and/or communities to rejoin their families. The likelihood that released inmates would locate into Lancaster area who had not previously been living there cannot be determined, as housing choice generally depends on factors such as employment opportunities, housing price, social networks, and other quality of life factors. Inmates who had lived in the Lancaster area before their incarceration would be returning to their home communities and not relocating if they again chose to live in Lancaster. Inmates whose families relocated into the Lancaster area during their incarceration would also not be relocating if their families chose to remain in Lancaster. Inmates who did not live in the Lancaster may relocate to the area upon release for any number of reasons, including their past incarceration at MLWDC. Any estimate of inmate relocation into Lancaster due to past detention at the Project would be highly speculative and no determination of impacts significance needs to be made.

Los Angeles Sheriff's Department Employee-Related Population, Housing, and Employment

The number of new employees that may be generated by the long-term operation of the Project is difficult to determine given the nature of the employment-hiring protocols within the Los Angeles Sheriff's Department (LASD). As stated in Section 3.0, Project Description, the Project would be

staffed by approximately 523 employees in total, with approximately 225 employees during the morning shift (6:00 AM to 2:00 PM); approximately 177 employees during the afternoon shift (2:00 PM to 10:00 PM); and approximately 121 employees during the evening shift (10:00 PM to 6:00 AM). This employment would include LASD security/sworn staff, LASD civilian staff, teachers, counselors, maintenance personnel, physicians, registered nurses, registered nurse practitioners, and other County employees.

The LASD staffing of MLWDC and hiring protocol would allow a "first right of refusal" to a pool of approximately 70 LASD staff members who remain employees and previously worked at the MLDC under the federal ICE operations. It is unknown how many of these former LASD employees would transfer back to work at the MLWDC. After former employees under the ICE operations are offered an opportunity to fill positions at the MLWDC, the LASD would then open up opportunities throughout the existing LASD employment workforce based on seniority. Again, it is not known how many existing LASD employees would choose to work at the MLWDC. It can be assumed that current LASD employees that live in the Antelope Valley area may be interested in working at the MLWDC to reduce their commutes to other LASD facilities.

Detailed review of all LASD staff zip code data shows that a total of 2,602 employees (or 14.5 percent of all 17,923 employees) currently reside in the Santa Clarita and Antelope Valley areas. The MLWDC will have a total employment of 523 positions, which is around 3 percent of all employment. If all 523 MLWDC employees come from the pool of 2,602 LASD employees already living in the area, there would be no expected relocations into the City of Lancaster. Thus, no effect on the local population and housing demand would occur from employment at the site.

If there are remaining positions at the MLWDC after LASD employee transfer requests, the last group would consist of newly hired employees. Under the most conservative scenario possible, in which it is assumed all 523 employees would be new hires and would all relocate from other places into the City of Lancaster itself, the 523 new employees at the Project site would equate to a maximum demand for 523 housing units, leading to an increase in the City's population by 1,684 persons (assuming an average household size of 3.22 persons per household, which is the City's average household size in 2015 (DOF 2015)). The introduction of 1,684 new residents into the City would represent a 1.05 percent increase in the City's 2015 population of 160,784 persons.

As discussed above, long-term operation of the Project would increase the number of persons living in group quarters in the City of Lancaster by 1,604 persons (1.0 percent population increase) and the worst-case scenario of 1,684 new residents associated with the new employees at the Project site (1.05 percent population increase) would result in an approximately 2.05 percent population growth in the City of Lancaster. This number could be slightly higher if inmate families decided to relocate to the City of Lancaster or if a higher percentage of workers at the MLWDC would be "new" hires that would relocate to the area. This approximate 2.05 percent or slightly higher increase in the City's 2015 population of 160,784 residents would not be considered substantial population growth.

With the Project, the LASD is likely to hire new employees from positions vacated by current employees who transfer to the MLWDC. With an unemployment rate of 8.1 percent in the City and 7.2 percent in the County as of March 2015, new hires could be filled by the available unemployed local labor force of 5,200 persons in the City of Lancaster and the unemployed labor force from other areas in Los Angeles County and region, based on individual eligibility for the vacant positions and the LASD's hiring protocol and requirements. Beneficial impacts on employment would occur in the region.

The number of jobs available in the City of Lancaster would increase by 523 positions from the 48,814 jobs in 2012 (SCAG 2013a) to 49,337 jobs. The increase would be within SCAG

projections of 51,900 jobs by 2020 and 54,200 jobs by 2035. The Project would not result in substantial employment growth in the City beyond what SCAG has projected to occur in 2020 and 2035. Thus, there would be no exceedance of SCAG's population projections for the City for 2020 and 2035, and no substantial employment growth would occur with the Project.

As discussed above, there are 4,912 vacant housing units in the City as of January 2015 and a large amount of vacant residential land that may be developed with new housing. The addition of as much as 523 new households would not substantially affect the availability of housing in the City of Lancaster. The increased demand for public services related to this population growth, and the impacts on these services are discussed in Section 4.12, Public Services and Recreation. Demands for utility services are discussed in Section 4.14, Utilities and Service Systems.

The demand for commercial goods and services from any new residents to the Lancaster area is anticipated to be met by existing local commercial/retail businesses and/or the expansion of such businesses. This increased demand would be negligible when compared to the City's total population (which is served by the City's existing commercial base and other commercial uses in the Antelope Valley) and would not substantially increase employment opportunities that could result in substantial increases in population.

Short-term demand for building materials and long-term demand for supplies and services to the Project would be met by existing businesses in the Antelope Valley and in the region. Unmet demands may present business opportunities for new employment, construction materials/home improvement, maintenance, commercial service providers, and other non-residential developments. The increased demand would encourage new businesses and/or the expansion of existing businesses that address the needs of the Project and in turn, create additional jobs in the area and the region, resulting in indirect demands for housing, commercial goods and service, public services and utilities. This impact would be incremental and considered less than significant.

Jobs/Housing Relationship

As indicated above, the Project would create 523 employment positions in the City of Lancaster. This would increase the City's job base in 2012 consisting of 48,814 jobs to 49,337 jobs with the Project. Assuming that due to the high housing vacancy, no new houses are built to accommodate the future relocation of Project employees and/or inmate households; then the City's jobs-housing ratio would change from the 2012 estimate of 0.93 to 0.94 jobs per housing unit with the Project. This increase would improve the City's jobs-housing ratio (providing more jobs for local residents) and is consistent with SCAG projections for an increase in jobs-housing ratio in Lancaster by 2020 (0.99 jobs per housing unit). Growth-inducing impacts would be less than significant and no mitigation is required.

Threshold 4.11b: Would the project displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?

Short-Term and Long-Term Impacts

There are no dwelling units, residents, households, or inmates at the Project site, and no housing or household displacement would occur with the Project. Although no housing units are proposed by the Project, group quarters for 1,604 inmates would be provided. No displacement impacts to the apartment complex located west of the site across 60th Street West would occur with the Project. Construction activities and operation of the Project would not involve the demolition or alteration of existing housing units. No housing displacement impacts would occur with the Project; no mitigation is required.

Threshold 4.11c: Would the project displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?

Short-Term and Long-Term Impacts

The Project would not displace residents or inmates at the MLDC since the facility has been closed since 2012 and no longer houses inmates. The Project would not result in the displacement of existing employees, as previously discussed, because former LASD employees and current LASD employees would have an opportunity to become employed at MLWDC. There would be no impacts associated with displacing people.

4.11.5 CUMULATIVE IMPACTS

Increases in the population and employment base of the City of Lancaster are expected with the Project, along with indirect increases in population and housing from relocating visitors and employees. Cumulative development projects in the area would also increase population, housing, and employment in the Antelope Valley. Future growth and development in the City and in the Antelope Valley would lead to the development of new homes; the creation of new jobs; and increases in the resident population of the City and the Valley. SCAG estimates that there could be as many as 787,438 persons, 251,558 households, and 264,354 jobs throughout the Antelope Valley (North Los Angeles County) by 2020 (SCAG 2012b). This would include the growth projections for the City of 174,800 residents, 52,200 households, and 51,900 jobs by 2020 (SCAG 2012a). Growth in the Antelope Valley between 2010 and 2020 is estimated at 128,683 residents, 48,848 households, and 74,200 jobs.

The increase in population itself is not expected to be a significant cumulative adverse impact as long as there is housing that can adequately accommodate the population and there are goods and services available to meet residents' needs. (The increase in the City's population is indirectly associated with relocating employees and visitors of the Project that would choose to permanently reside in the City.) The cumulative increase in population in the Antelope Valley would be accompanied by a decrease in housing vacancy and/or an increase in housing stock, as projected by SCAG. Also, there is a large amount of vacant residential land in the City that could be developed to accommodate the future demand for housing. Housing availability is expected to closely match demand, such that the rate of housing development by private developers in the various cities and communities in the Antelope Valley will follow the increase in housing demand in the area.

Demand for commercial goods and services is expected to be met by existing businesses and new business ventures that serve the marketplace. This may include businesses in the City and adjacent areas. Public service demand by future residents is expected to be met by various public service providers in the Antelope Valley, including the City. This is discussed in Section 4.12, Public Services and Recreation, of this EIR. Cumulative impacts would be less than significant.

The Project would not result in housing displacement. No significant cumulative adverse impacts related to housing displacement would occur. No employment displacement would occur, and the Project would not contribute to cumulative employment displacement.

Cumulative impacts related to population, housing, and employment would be less than significant and no mitigation is required.

4.11.6 MITIGATION MEASURES

No significant adverse impacts on population, housing, or employment have been identified; therefore, no mitigation is required.

4.11.7 LEVEL OF SIGNIFICANCE AFTER MITIGATION

Direct, indirect and cumulative impacts on population, housing, and employment would be less than significant.

4.11.8 REFERENCES

California Department of Corrections and Rehabilitation (CDCR). 2014 (October 1). Monthly Report of Population as of Midnight September 30, 2014. Sacramento, CA: CDCR.

California Department of Finance (DOF). 2015 (May 1). E-5 Population and Housing Estimates for Cities, Counties, and the State, January 1, 2011 – 2015. Sacramento, CA: DOF.

California Employment Development Department (EDD). 2015 (April 17). Monthly Labor Force Data for Cities and Census Designated Places (CDP) – March 2015 – Preliminary. Sacramento, CA: EDD.

Cervero, R. and M. Duncan. 2006 (Autumn). Which Reduces Vehicle Travel More: Jobs-Housing Balance or Retail-Housing Mixing? *Journal of the American Planning Association*. 72(4): 475–490. Chicago, IL: American Planning Association. <http://www.uctc.net/papers/825.pdf>.

Greater Antelope Valley Economic Alliance (GAVEA). 2014. 2014 Economic Roundtable Report. Lancaster, CA: GAVEA.

Lancaster, City of. 2013 (October 22, adopted). City of Lancaster General Plan Housing Element (2014 to 2021). Lancaster, CA: Lancaster.

———. 2009a (July 14, adopted). *City of Lancaster General Plan 2030*. Lancaster, CA: the City. <http://www.cityoflancasterca.org/Index.aspx?page=427>.

———. 2009b (April). *General Plan 2030 Master Environmental Assessment*. Lancaster, CA: City of. <http://www.cityoflancasterca.org/Modules/ShowDocument.aspx?documentid=11352>.

Los Angeles, County of. 2014 (August). *Antelope Valley Area Plan Draft Environmental Impact Report*. Los Angeles, CA: the County.

———. 2013. (July 5). *Los Angeles County Jail Plan Independent Review and Comprehensive Report – Final Report*. Prepared by Vanir Construction Management, Inc.

———. 2010. *One Valley One Vision Revised Draft Program Environmental Impact Report*. Los Angeles, CA: the County.

Southern California Association of Governments (SCAG). 2013a (May). Profile of City of Lancaster. Los Angeles, CA: SCAG.

———. 2013b (May). Profile of Los Angeles County. Los Angeles, CA: SCAG.

- . 2012a (April). Growth Forecast Appendix – 2012-2035 Regional Transportation Plan/Sustainable Communities Strategy. Los Angeles, CA: SCAG.
- . 2012b. Growth Forecast by Subregion. Los Angeles, CA: SCAG.

This page intentionally left blank

4.12 PUBLIC SERVICES AND RECREATION

This section of the EIR describes existing public services in the Project area and addresses potential Project impacts related to the services listed below. Information provided in this section regarding these public services is based on written responses to the Notice of Preparation (Appendix A); written correspondence from various public service providers (Appendix G); and the websites of the service providers (the service provider is noted in parenthesis):

- Fire protection (Los Angeles County Fire Department [LACFD]);
- Hospital services (Antelope Valley Health Care District, High Desert Health System, and private companies);
- Police protection (Los Angeles County Sheriff's Department [LASD]);
- School services (Lancaster School District [LSD], Westside Union School District [WUSD], Eastside Union School District [EUSD], and Antelope Valley Union High School District [AVUHSD]);
- Parks (City of Lancaster and County of Los Angeles Department of Parks and Recreation); and
- Library services (County of Los Angeles Public Library).

4.12.1 RELEVANT PROGRAMS AND REGULATIONS

State

2013 California Fire Code

The California Fire Code (*California Code of Regulations*, Title 24, Part 9) is designed to be adopted by reference into local ordinances. The purpose of the Code is to ensure the safeguarding of life and property from fire and explosion hazards arising from the storage, handling and use of hazardous substances, materials, and devices and from conditions hazardous to life or property. It includes regulations for Group I-3 buildings, which includes detention centers, jails, and prisons. Requirements include annual employee training on fire suppression equipment; 24-hour staffing; release locks for emergency evacuations; sprinkler system requirements; flame-resistant furniture; fire alarm systems; and refuge area capacity standards.

County

Los Angeles County Fire Code

The County of Los Angeles Fire Code (County of Los Angeles Code, Title 32), which incorporates, by adoption, the 2013 California Fire Code, provides minimum standards to safeguard the public's safety and welfare in relation to fire hazards. Specifically, Title 32 describes all standards and requirements for development pertaining to fire prevention and suppression in unincorporated County areas. These building standards and requirements address, among other requirements, construction materials; building access and evacuation routes; automatic fire extinguisher systems; standards for multi-family housing and commercial/retail land uses; site access/fire lanes; hydrants; water availability; and fire flows (pressures). The Code also addresses construction in fire hazard areas; the storage, use, handling, and transportation of hazardous materials; and the use of equipment and activities involving fire. New construction, rehabilitation, alteration, and/or expansion are required to comply with the Fire Code, with the County Fire

Department having authority to inspect buildings and premises for compliance and to correct conditions that may cause fire or contribute to its spread.

Los Angeles County Code

Title 13 of the Los Angeles County Code provides the County's regulations for protecting the public peace, morals, and welfare. These regulations address offenses by or against public officers and government; offenses against public decency; offenses against public peace; protection for consumers; offenses by or against minors; weapons violations; discrimination against persons with AIDS; and nuisance abatement for counterfeit goods. Title 15 of the County Code includes regulations for vehicles and traffic on roads, crosswalks, bicycle lanes, railroad crossings, parking, and other related traffic conditions. Chapters 66 and 67 of Title 26 of the County Code also contain minimum standards of construction for security. These regulations are enforced by the LASD, along with other regulations regarding public safety and police protection.

County of Los Angeles General Plan

The Los Angeles County Board of Supervisors approved the General Plan Update in March 2015. The Public Services and Facilities Element of the General Plan 2035 promotes the orderly and efficient planning of public services and facilities. This Element calls for effective service and facilities planning and maintenance and coordination of land use and school and library facilities and planning. The Safety Element of the General Plan 2035 sets goals and policies to reduce the demand for fire and police protection services and adequate sheriff and fire services for emergency response. The Parks and Recreation Element of the General Plan 2035 sets the County goals at 4 acres of local parkland per 1,000 residents in the unincorporated areas and 6 acres of regional parkland per 1,000 residents of the total population of Los Angeles County.

Antelope Valley Areawide General Plan

The Antelope Valley Areawide General Plan (AVAGP) is a component of the *County of Los Angeles General Plan* and is intended to provide focused direction for development within the unincorporated portions of the Antelope Valley. The AVAGP includes a policy to consider the feasibility of providing a detention facility in the Antelope Valley and to expand fire stations commensurate with population growth. The LACDRP is in the process of updating the AVAGP and anticipates adoption of the draft Antelope Valley Area Plan in 2015 (Nadela 2014). The draft Antelope Valley Area Plan includes policies to require that all new developments provide sufficient access for emergency vehicles and sufficient evacuation routes for residents and animals and to provide strict enforcement of the Fire Code and all Fire Department policies and regulations.

City

Lancaster General Plan

The *City of Lancaster General Plan 2030* includes the City's goals, objectives, policies, and actions for the natural environment, public health and safety, active living, physical mobility, municipal services and facilities, economic development and vitality, and physical development. Its performance objective for fire protection is to provide a 5-minute average response time from receipt of an alarm at station to time of arrival on scene. Its performance objective for police protection is to reduce Part I crimes¹ to be below 300 crimes per 10,000 people. The General

¹ Part I crimes are also called "index crimes" and include homicide, rape, robbery, aggravated assault, burglary, larceny/theft, motor vehicle theft, and arson.

Plan also has an objective to provide sufficient neighborhood and community park facilities at a rate of 5.0 acres of parkland per 1,000 residents (Lancaster 2009a).

Lancaster Municipal Code

Chapter 15.32, Fire Code, of the Lancaster Municipal Code adopts the 2014 County of Los Angeles Fire Code, incorporating by adoption the 2013 California Building Code.

The LASD provides police protection and law enforcement services in the City of Lancaster and enforces the City's regulations as contained in the Lancaster Municipal Code (specifically Title 9, Public Peace, Morals and Welfare, and Title 10, Vehicles and Traffic) as well as other City regulations on public safety and police protection.

4.12.2 EXISTING CONDITIONS

Fire Protection and Emergency Medical Services

The Los Angeles County Fire Department (LACFD) provides fire protection and emergency medical services to the Cities of Lancaster and Palmdale and the surrounding unincorporated County areas through various fire stations in the Antelope Valley.

The addresses and distances from the site of fire stations that are located nearest the Project site are provided below in Table 4.12-1.

**TABLE 4.12-1
FIRE STATIONS IN THE PROJECT AREA**

Fire Station Number	Address	Distance from Project Site
84	5030 West Avenue L-14 Quartz Hill, CA 93536	3.75 miles south
112	8812 West Avenue E-8 Lancaster, CA 93536	4.37 miles northwest
130	44558 40 th Street West Lancaster, CA 93536	1.78 miles east
134	43225 25 th Street West Lancaster, CA 93534	3.87 miles southeast

* Source: Lancaster 2009b.

Fire Station 130 is located closest (1.78 miles) to the site and is the jurisdictional station (i.e., first due) for the Project site. This station is manned by a three-person engine company and a three-person urban search and rescue squad. Effective January 1, 2015, the three-person engine company was converted to a four-person assessment engine, which is an engine company with some limited paramedic capabilities (LACFD 2014.)

Neither the Project site nor the City of Lancaster is located within areas identified to have Very High Fire Hazard Severity, as mapped by the California Department of Forestry and Fire Protection (CAL FIRE) (CAL FIRE 2011).

Hospital Services

There are several hospitals and medical facilities in the Antelope Valley that serve the medical needs of the area's residents, visitors, and employees. These include the following:

- Antelope Valley Hospital is a 420-bed, non-profit, acute care, medical and surgical hospital located at 1600 West Avenue J in Lancaster. It is operated by the Antelope Valley Health Care District;² is Antelope Valley's only full-service hospital; and has a medical staff of over 450 physicians and a total staff of 2,500 employees. This hospital includes a 24-hour emergency room; obstetrics; rehabilitation, occupational, and physical therapy; comprehensive diagnostic imaging services; home care, including skilled nursing, intravenous therapy, wound care, newborn baby/mother visits, pediatrics, medication administration, pain management, medical social workers; and forensic services (AVH 2015). Antelope Valley Hospital is the health care facility located nearest to the Mira Loma Detention Center (MLDC), approximately 4.5 miles to the southeast.
- The High Desert Health System or the High Desert Multi-Ambulatory Care Center (HDHS MACC) provides health services to the Antelope Valley through five centers. The main center is the High Desert Regional Health Center (HDRHC), located at 335 East Avenue I in Lancaster. It is a County-operated outpatient facility offering primary care services in pediatrics and adult internal medicine; it also has a women's clinic and offers urgent care services. HDRHC's specialty care services include cardiology; clinical psychology; nephrology; oncology; ophthalmology; orthopedic surgery; physical, occupational, and speech therapy; podiatry; psychiatry; respiratory therapy; and urology. The HDRHC is located 5.9 miles east of the Mira Loma Detention Center. The other centers are the Foster Care HUB Clinic, Suspected Child Abuse and Neglect (SCAN) Clinic, the Hope Center Human Immunodeficiency Virus (HIV)/Acquired Immune Deficiency Syndrome (AIDS) Clinic, Disease Management Clinics for Asthma and Diabetes, and the Pediatric Behavior Disorders Clinic (DHS 2015).
- The Palmdale Regional Medical Center (PRMC) is a 157-bed private hospital located at 38600 Medical Center Drive in Palmdale. This hospital features inpatient and outpatient surgery, cardiac services, and a 35-bed 24-hour emergency department. Over 400 physicians are on the medical staff of PRMC, with a total of approximately 800 employees. Their services include anesthesiology, cardiology, case management, diabetes management, emergency services, gastroenterology, neurology, nuclear medicine, oncology, orthopedic surgery, pathology, plastic surgery, radiology, respiratory services, and vascular services, among others (PRMC 2014). PRMC is located 9.2 miles southeast of the Project site.
- Kaiser Permanente (KP) has several medical offices located in the Antelope Valley. However, individuals who are insured by Kaiser Permanente and are in need of hospital services in the Valley are directed to Antelope Valley Hospital (KP 2015).
- The Antelope Valley Surgery Center (AVSC) is an ambulatory surgery center located on 44301 North Lorimer Street in Lancaster. It is a 22-bed outpatient surgery center with approximately 20 physicians and 30 employees. The AVSC offers procedures in anesthesiology, general surgery, gynecology, ophthalmology, orthopedic surgery, pain management, plastic surgery, podiatry, urology, and vascular surgery (AVSC 2015). AVSC is located 4.0 miles southeast of the site.

² The Local Health Care District Law authorizes the creation of special districts to build and operate health care facilities in under-served areas. There are 78 health care districts in California, one of which is the Antelope Valley Health Care District.

Police Protection and Law Enforcement

Law enforcement services in the City of Lancaster are provided by the LASD, with the Lancaster Sheriff's Station located at 501 West Lancaster Boulevard, approximately 5.2 miles east of the Project site. This station also serves the communities of Lake Los Angeles, Quartz Hill, and Antelope Acres. Personnel at the Lancaster Sheriff's Station includes 189 sworn officers and 74 civilian personnel (LASD 2015).

In 2013, the station handled 4,907 reported Part I crimes and, as of the end of September 2014, there were 3,828 reported Part I crimes. This translates to a crime rate of 194.48 crimes per 10,000 population in 2013 and 203.63 crime rate in 2014 (LASD 2014a).

The Project site is within the patrol area of the Lancaster Sheriff's Station and will be operated by the LASD's Custody Services Division. This division is responsible for the operation of County jails and the care, custody, security and rehabilitation of all sentenced and pretrial inmates in the County jail facilities (LASD 2014b).

School Services

The Lancaster area is served by four public school districts: Lancaster School District (LSD), Westside Union School District (WUSD), Eastside Union School District (EUSD), and Antelope Valley Union High School District (AVUHSD). The Project site is located within the service boundaries of the WUSD and the AVUHSD (Lancaster 2009b). The nearest school is Sundown Elementary School, located at 6151 West Avenue J-8, approximately 1.2 miles southwest of the Project site.

The WUSD has seven elementary schools (Kindergarten through 6th grade), four senior elementary schools (Kindergarten through 8th grade), and three middle schools (6th grade through 8th grade). The Project site is located within the service boundaries of Sundown Elementary School and Del Sur K-8 School (WUSD 2014).

The AVUHSD has eight high schools, and the site is within the service boundaries of Lancaster High School. This high school is located at 44701 North 32nd Street West, 2.2 miles east of the site (AVUHSD 2014).

Other schools in the surrounding area include the Bethel Christian School (3.0 miles to the southeast); Desert Christian High School (4.1 miles to the southeast); Antelope Valley Adventist School (5.0 miles to the east); Antelope Valley Christian School (3.5 miles to the southeast); Pinecrest School (3.9 miles to the southeast); Paraclete High School (4.5 miles to the southeast); Antelope Valley College (2.7 miles to the southeast); Lancaster Learning Center of the University of Phoenix (4.7 miles to the southeast); University of Antelope Valley (5.5 miles to the southeast); Charter College Lancaster (6.1 miles to the southeast); San Joaquin Valley College – Antelope Valley (5.8 miles to the southeast); and West Coast Baptist College (9.7 miles to the east).

Recreational Facilities

The Antelope Valley affords residents convenient access to a variety of open space, parks, and other recreational resources managed by the State, by the County, and by local cities. There are several State and County parks and recreational facilities available to residents of the City of Lancaster, including the California Poppy Reserve, Arthur B. Ripley Desert Woodland Preserve, Saddleback Butte State Park, Antelope Valley Indian Museum, Antelope Valley Fairgrounds, Apollo County Park, and George Lane County Park. In addition, the City of Lancaster Parks, Recreation, and Arts Department operates 12 parks and recreational and cultural facilities in the

City on approximately 448 acres (Lancaster 2009b). The Angeles National Forest, along the southern and western borders of the Antelope Valley, also offers numerous opportunities for recreation.

The nearest park to the site is Rawley Duntley Park, located 2.85 miles to the southeast. This 20-acre City park is developed with a playground, lighted baseball fields, basketball courts, volleyball courts, picnic areas, restrooms, walking trails, open fields, and a parking lot (Lancaster 2010). Apollo Regional Park, located 3.08 miles to the northeast, is a 54-acre County park developed with 3 man-made lakes for fishing, walking/bike paths, playgrounds, a concession building, picnic areas, pergolas, restrooms, and parking areas (LACDPR 2014).

In addition to parks and natural open space areas designated for recreational use, the County and the City both operate a system of riding and hiking trails and there are both public and private golf courses located in the area (Lancaster 2009b). However, there are no bikeways or trails near the site.

Library Services

The County of Los Angeles Public Library provides library services and operates libraries in both unincorporated and incorporated areas of Los Angeles County. The County operates four libraries available in the Antelope Valley, including the Lancaster Library, the Quartz Hill Library, the Lake Los Angeles Library, and the Littlerock Library (County Library 2015a).

The Lancaster Regional Library is located at 601 West Lancaster Boulevard, 5.1 miles east of the site. This library was built in 1996 and has 48,721 square feet of floor area. The facility includes a meeting room, an adult reading room, a children's area, a young adult area, a study room, a circulation desk with ten check-out terminals, and several public use computers (County Library 2015b).

The Quartz Hill Library is located at 42018 50th Street West, 3.9 miles south of the site. This library was founded in July 1959 and has 3,530 square feet of floor area, which contains a children's area and a teen space. The library contains 68,479 resource, education, and recreation materials (which include books, periodicals, magazines, audio tapes, video tapes, and compact discs), and 9 public use computers (County Library 2015c).

The Lake Los Angeles Library and the Littlerock Library are located farther east and southeast of the site, respectively. Antelope Valley College has an on-campus library at the northwest corner of West Avenue K and 30th Street West that is open to the public (AVC 2015).

4.12.3 THRESHOLDS OF SIGNIFICANCE

The following thresholds of significance are derived from the Environmental Checklist in Appendix G of the State CEQA Guidelines. The Project would result in a significant impact related on Public Services if it would:

Threshold 4.12a: Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:

- Fire protection services,

- Police protection services,
- Schools,
- Parks, and/or
- Other public facilities.

A project would result in a significant adverse impact on Recreation if it would:

Threshold 4.12b: Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated.

Threshold 4.12c: Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment.

4.12.4 PROJECT DESIGN FEATURES

PDF PS-1 The Contractor's Specifications will require that the Project will include space to accommodate both indoor and outdoor recreational facilities for inmate use only, including a recreational building for indoor recreation (e.g., game tables and a craft room); a full sized sports court for volleyball and basketball; a soccer field; a running track; and gardening areas, for both vegetable and flower cultivation.

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

PDF PS-3 The Contractor's Specifications will require that the Project will include space to accommodate a Medical Building and Inmate Processing Area that will provide medical screening; mental health screening; a pharmacy; dental care services; radiology; laboratory services; obstetrics and gynecological services; orthopedic and dermatology services; wellness, hygiene, and diseases prevention training; preventative medical care; sick call services; emergent care; annual medical and dental exams; and tele-medicine/tele-psychiatry services.

4.12.5 REGULATORY REQUIREMENTS

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

RR PS-2 The Project will be designed, constructed and operated in accordance with pertinent provisions of Title 15 of the California Code of Regulations (Crime Prevention and Corrections) and other applicable State and federal requirements. Title 15 (specifically Division 1, Chapter 1, Subchapter 4) outlines the minimum standards for local detention facilities, court holding facilities, temporary holding facilities, and law enforcement facilities, including lockups (a locked room or secure

enclosure under the control of a peace officer or custodial officer and primarily used for the temporary confinement).

4.12.6 ENVIRONMENTAL IMPACT ANALYSIS

Threshold 4.12a: **Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities the construction of which would cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for:**

(i) fire protection?

(iv) other public facilities (medical)?

Short-Term Construction Impacts

The Project would lead to the expansion and reuse of the existing unoccupied detention facility and the re-introduction of inmates and staff to the Project site, which would increase the demand for fire protection services at the Project site.

Construction activities at the site would create a potential demand for fire-protection services due to the presence fire sources that could ignite flammable and combustible materials. Short-term construction activities have the potential to increase the risks associated with fires due to the presence of heavy construction equipment (including the use of flammable liquids) and the presence of combustion engines (which could result in leaks that create fire risks). As with all construction activities in California, the County would be required to implement applicable requirements of Chapter 33 of the California Fire Code (Fire Safety During Construction and Demolition), which has been incorporated into the County Fire Code (RR PS-1). This chapter prescribes minimum safeguards to prevent fire and to provide reasonable safety to life and property. Building plans would be reviewed and structures inspected by the Los Angeles County Fire Department and the Los Angeles County Building and Safety Department for compliance with applicable standards for ingress/egress access, fire flow, fire sprinkler systems, fire hydrants, driveway widths and turning radii, and other pertinent requirements. These standards specify site design and building material and construction methods that would reduce the demand for fire protection services and would facilitate emergency response and evacuation.

Also, construction-related activities, primarily from the hauling of large equipment and materials to and from the Project site, could temporarily increase traffic volumes and obstruct traffic circulation in the Project area, thereby potentially impacting fire department response times. However, as discussed in Section 4.12, Transportation, the addition of the anticipated level of construction traffic to existing traffic conditions in the area would not be expected to noticeably alter traffic patterns or cause congestion in the immediate area.

As discussed in Section 4.11, Population and Housing, the local population in the Antelope Valley could provide adequate skilled workers and construction crews to fill the construction-related positions; however, even if all workers come from outside the Antelope Valley, they are not likely to relocate to the surrounding area since the construction employment would be temporary and short-term. Therefore, short-term impacts due to the presence of construction workers would not require additional fire protection services or facilities. Compliance with RR PS-1 would ensure less than significant short-term construction impacts related to fire protection and no mitigation is required.

Long-Term Operational Impacts

The Project would involve the renovation of some existing structures; the demolition of some of the existing structures; and construction of new structures. All new structures and building expansions would be required to comply with Title 24 building code standards, and renovated structures may also be required to comply with Title 24 building code standards if the renovations affect the “envelope” of the building (e.g., walls, doors, and windows).

The Notice of Preparation (NOP) comment letter from the LACFD identifies a number of development standards that the Project would need to incorporate into the site planning and building design. As required under RR PS-1, the Project would be constructed in accordance with all County Fire Code requirements regarding fire prevention and suppression measures, including construction materials; building access and evacuation routes; automatic fire-extinguishing systems; site access/fire lanes; water availability; fire flows; and hydrants, among other requirements. The LACFD would review and approve all building plans, and inspections for compliance with fire safety regulations shall be completed prior to issuance of certificate of occupancy.

Compliance with the County Fire Code would avoid the creation of structural fire hazards and would reduce potential demands for fire protection services. Thus, the risk of fire from older electrical and gas systems would be reduced by the Project. While an increase in the number and size of structures and the introduction of an inmate population and employees may lead to an increased risk of structural fires due to human errors and accidents and/or additional demand for emergency medical services, the Project would reduce the potential for accidental fire from faulty electrical and gas systems and appliance malfunctions.

The Project would include security and safety provisions for detention facilities (RR PS-2) and would protect the public by safely keeping the inmates. These standards require that each facility have a plan for fire suppression that is developed with the local fire department and/or the State Fire Marshal and that includes, but is not limited to: (1) fire suppression pre-plan developed with the local fire department to be included as part of the policy and procedures manual, (2) regular fire prevention inspections by facility staff on a monthly basis with two year retention of the inspection record; (3) fire prevention inspections as required by the California Health and Safety Code, which requires inspections at least once every two years; (4) an evacuation plan; and (5) a plan for the emergency housing of inmates in the case of fire.

As required under RR PS-2, the facility's policy and procedures manual shall outline emergency procedures that include and/or address: (1) fire suppression pre-plan; (2) escape, disturbances, and the taking of hostages; (3) civil disturbance; (4) natural disasters; (5) periodic testing of emergency equipment; and (6) storage, issue, and use of weapons, ammunition, chemical agents, and related security devices. Compliance with the Project's emergency procedures would reduce the incidence of fire and the demand for fire protection services.

The LACFD indicated that fire protection services serving the area “appears to be adequate for the existing development/land use. While each additional development creates greater demands on existing resources, in the absence of cumulative impact, this project appears to have a less than significant impact on fire protection services” (LACFD 2014).

Operation of the Project would also be subject to inspections by the Board of the State and Community Corrections, the Los Angeles County Department of Public Health, and the State Fire Marshall. These inspections are expected to regularly review site conditions and operations and would serve to prevent the creation of fire hazards and other health safety hazards at the facility.

Thus, implementation of the Project would not result in significant demands for LACFD services and facilities in the Antelope Valley. With a less than significant impact on LACFD services, it is not expected that additional staffing and/or resources or an increase or exceedance in service ratios, response times, or other performance objectives would occur.

The Project is anticipated to have a total of approximately 523 employees. Based on LASD hiring protocols, it is highly likely that former employees at the MLDC under the U.S. Immigration and Customs Enforcement (ICE) operations and current LASD employees who live in the Antelope Valley and Santa Clarita areas may choose to work at the Project site to reduce their commutes to other LASD facilities. Under this scenario, no relocations into the City would occur. Under the most conservative scenario where all Project employees choose to relocate from other places into the City of Lancaster, the 523 employees and households potentially relocating into the area would equate to a maximum demand for 523 housing units.

In addition, some families of the inmates may choose to relocate to the Lancaster area for ease of visitation. However, due to the relatively short duration of time that inmates would be housed at MLWDC, family relocation is anticipated to be minimal, as discussed in Section 4.11, Population and Housing, of this EIR. Also, potential MLWDC employee relocations and visitor/family member relocations are anticipated to be met by existing vacant dwelling units in the City of Lancaster or the surrounding area.

The Project could result in indirect impacts related to population growth due to the provision of new employment opportunities and, potentially, visitors/families that relocate, but this would not result in substantial housing growth and would therefore not result in significant indirect impacts associated with the need for and the provision of new fire protection services. There would be less than significant long-term impacts to fire protection services and no mitigation is required.

Emergency medical services would be provided by LACFD paramedics and local hospitals, such as Antelope Valley Hospital and Palmdale Regional Medical Center. These hospitals provide emergency medical services in accordance with Section 1317 of the *California Health and Safety Code*, which states that emergency services and care shall be provided to any person requesting the services or care for a condition in which the person is in danger of loss of life or serious injury or illness at any health facility that maintains and operates an emergency department.

Inmates taken to area hospitals for emergency medical services and/or treatment would be provided with security by deputy personnel who would be assigned by the Watch Commander.

Other non-emergency medical needs of the inmates would be handled by the staff at the on-site Medical Building (PDF PS-3) or at a local contract provider facility. Female inmates requiring a higher level of medical or mental health care would not be housed at the Project.

The Project would be built in accordance with RR PS-1 and operated in accordance with RR PS-2, as well as other applicable laws and regulations. Thus, Project implementation would not create a public health or safety hazard that would generate a high demand for emergency or non-emergency medical services. The demand for emergency medical services from the Project is not expected to create a significant impact on local hospitals or local contract provider facilities. Impacts would be less than significant and no mitigation is required.

Threshold 4.12a: **Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities the construction of which would cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for:**

(v) police protection?

Short-Term Construction Impacts

The Project would lead to an increase in structures and property as well as the re-introduction of inmates and staff to the site, which would increase the demand for police protection and law enforcement services at the Project site.

The presence of equipment and building materials during construction activities can provide opportunities for theft or vandalism. However, there would be no unusually valuable or out of the ordinary equipment or materials associated with construction of the Project that would be unusually attractive for criminal activity. Additionally, it is anticipated that crime would be deterred at the Project site given the Project site's location within the MLDC; in proximity to law enforcement personnel; and with the construction area contained inside existing security fencing. There would be less than significant construction-related impacts on police protection services and no mitigation is required.

Long-Term Operational Impacts

The Project would be operated by the LASD through its Custody Division. A total 523 employees would be on site to operate the facility, the majority of which would be LASD employees who would provide appropriate security and support services in accordance with the mandates of Title 15 of the *California Code of Regulations* (RR PS-2) and the LASD's determination of the needed staffing to properly operate the facility.

Based on consultation with the LASD, the Department has indicated that the Project would result in a less than significant impact on law enforcement resources and operations because the previously occupied facility was already within the Lancaster Station's service area (LASD 2014b).

The Project would include security and safety provisions for detention facilities (RR PS-2) and would protect the public by safely keeping the inmates. The standards in Title 15 of the *California Code of Regulations* require that each facility have a plan for fire suppression that is developed with the local fire department and/or the State Fire Marshal and that includes, but is not limited to: (1) fire suppression pre-plan developed with the local fire department to be included as part of the policy and procedures manual, (2) regular fire prevention inspections by facility staff on a monthly basis with two year retention of the inspection record; (3) fire prevention inspections as required by the California Health and Safety Code, which requires inspections at least once every two years; (4) an evacuation plan; and (5) a plan for the emergency housing of inmates in the case of fire.

Under RR PS-2, the facility's policy and procedures manual should also outline emergency procedures that include and/or address: (1) fire suppression pre-plan; (2) escape, disturbances, and the taking of hostages; (3) civil disturbance; (4) natural disasters; (5) periodic testing of emergency equipment; and (6) storage, issue, and use of weapons, ammunition, chemical agents, and related security devices.

The long-term operation and management of the Project may require the hiring of some new employees, including sworn LASD officers. However, the number of new employees that may be

generated by the long-term operation of the Project is difficult to determine given the nature of the LASD's employment-hiring protocols, as described in Section 4.11, Population and Housing. The Project facility would accommodate all new employees and no additional LASD facilities would be required. Thus, the Project would not create a need for additional staffing and/or resources beyond what was anticipated and accounted for through the Project's facilities, nor would it result in an increase or exceedance in service ratios, response times, or other performance objectives of the Lancaster Sheriff's Station.

As discussed above, indirect impacts related to population growth due to the provision of new employment opportunities and relocating visitors/families would not result in substantial housing growth and would therefore not result in significant indirect impacts associated with the provision of new police protection and law enforcement services in the Lancaster and the Antelope Valley areas. There would be less than significant long-term impacts to police protection services and no mitigation is required.

Threshold 4.12a: Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities the construction of which would cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for:
(vi) schools?

Short-Term Construction Impacts

As discussed in Section 4.11, Population and Housing, it is anticipated that the local population could provide adequate skilled workers to satisfy the construction-related positions and there would be no need to relocate workers from other areas. Therefore, the presence of construction workers would not directly or indirectly result in new demands for additional school or other educational facilities because the construction workers are not likely to relocate to areas near the site due to temporary employment. No impact would occur.

Long-Term Operational Impacts

The Project would serve adult female inmates. Juveniles, who may still be enrolled in public schools, are not processed and housed through the County jail system. Rather, they are processed and housed through the County's juvenile detention system.

The adult inmate population at the Project site would not require school services from local school districts because the inmates would be confined to the site and education and training programs would be provided by on-site facilities and programs (PDF PS-2). There would be no opportunities for the female inmates to utilize public school facilities or services.

The Project does not include residential land uses and would not therefore directly generate population growth that would result in additional demand for school services in the Project area. However, Project employees have the potential to indirectly generate a demand for schools if new residents are drawn to the area due to employment at the Project site. Also, inmate family households may relocate to the area and indirectly generate a demand for schools.

As discussed in Section 4.11, Population and Housing, family relocation into the Lancaster area may occur with the Project but is anticipated to be minimal. Also, the Project is anticipated to be staffed by approximately 523 employees who could be currently residing in the area or who would potentially relocate into the area. Based on LASD hiring protocols, it is highly likely that former employees at the MLDC under the U.S. Immigration and Customs Enforcement (ICE) operations

and current LASD employees who live in the Antelope Valley and Santa Clarita areas may choose to work at the Project site to reduce their commutes to other LASD facilities. Under this scenario, no relocations would occur. Under the most conservative scenario where all Project employees relocate from other places into the City of Lancaster, the 523 employees and households potentially relocating into the area would equate to a maximum demand for 523 housing units. This demand could be slightly higher if inmate families decided to relocate to the City of Lancaster. The demand for housing from inmate families and employees potentially relocating into the area would be easily met by the 4,912 vacant housing units in the City of Lancaster as of January 2015 (DOF 2015).

Vacant residential units in the City of Lancaster and the Antelope Valley area would have paid school mitigation fees in accordance with the School Facilities Act (Section 65970 of the *California Government Code*) during the initial construction of these homes/residences. As such, the demand for school services from these homes would have been paid by school mitigation fees at that time to reduce their impacts on school services. Thus, the Project could result in indirect impacts related to population growth and could create indirect impacts associated with increased demand for Antelope Valley area schools or other educational facilities or services. However, these impacts would be less than significant and no mitigation is required.

Threshold 4.12a: **Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities the construction of which would cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for:**

(vii) parks?

Threshold 4.12c: **Would the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?**

Short-Term Construction Impacts

As set forth in PDF PS-1, the Project would provide recreational facilities on the Project site for the exclusive use by inmates. These would include a recreational building for indoor recreation (e.g., game tables and a craft room) and outdoor recreation yards with a sports field, game courts, patios, outdoor seating, walkways, and gardens. The impacts of constructing these facilities are evaluated in other sections of this EIR. Notably, local and regional air quality impacts are addressed in Section 4.2, Air Quality; noise and vibration impacts are addressed in Section 4.10, Noise; and traffic impacts are addressed in 4.13, Transportation/Traffic. As identified through the analysis presented in this EIR, implementation of the Project would result in less than significant impacts for all environmental topics with implementation of the Project Design Features (PDFs), Regulatory Requirements (RRs), and Mitigation Measures (MMs) described herein and summarized in the Executive Summary of this document.

Long-Term Operational Impacts

The Project would provide recreational facilities on the Project site for the exclusive use by inmates. All recreational needs would be provided by on-site facilities (see PDF PS-1) and there would be no long-term demands for additional off-site parks or other recreational facilities. There would be no long-term impacts associated with the Project because they would not be public facilities that could generate traffic or other environmental consequences. Impacts would be less than significant and no mitigation is required.

Threshold 4.12b: Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

Short-Term Construction Impacts

As discussed in Section 4.11, Population and Housing, it is anticipated that the local population could provide adequate skilled workers to satisfy the construction-related positions and there would be no need to relocate workers from other areas. Therefore, the presence of construction workers would not directly or indirectly result in new demands for additional parks or recreational facilities because the construction workers are not likely to relocate to areas near the site due to temporary employment. No impact would occur.

Long-Term Operational Impacts

Project inmates would not increase in the use or demand for recreational facilities in the City of Lancaster or the surrounding area, as the inmates would not be allowed off site. On-site recreational facilities would be provided for inmate use (PDF PS-1). However, Project employees and inmate family households have the potential to indirectly generate a demand for recreational facilities if they move to the City of Lancaster or the Antelope Valley.

The Project does not include residential land uses, and would not therefore directly generate population growth that would result in additional demand for parks or recreational facilities in the Project area. However, Project employees have the potential to indirectly generate a demand for parks if new residents are drawn to the area due to employment at the Project site. Also, inmate family households may relocate to the area and indirectly generate a demand for parks.

As discussed in Section 4.11, Population and Housing, under the most conservative scenario where all Project employees relocate from other places into the City of Lancaster, the 523 employees and households relocating into the area would equate to a maximum demand for 523 housing units. This demand could be slightly higher if inmate families relocate to the City of Lancaster.

This demand would be easily met by the 4,912 vacant housing units in the City of Lancaster as of January 2015 (DOF 2015). Vacant residential units in the City of Lancaster and the Antelope Valley area would have satisfied the General Plan objective to provide sufficient neighborhood and community park facilities at a rate of 5.0 acres of park land per 1,000 residents during the initial construction of these homes/residences. These housing developments are expected to have provided on-site common recreational facilities in multi-family developments or to have paid in lieu fees for parkland in accordance with the Chapter 15.72 of the Lancaster Municipal Code.

The Project could result in indirect impacts related to population growth and could create indirect impacts associated with increased demand for Antelope Valley area recreational facilities. However, these impacts would be less than significant and no mitigation is required.

Libraries

Threshold 4.12a: Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities the construction of which would cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for:

(viii) other public facilities (libraries)?

Short-Term Construction Impacts

As discussed in Section 4.11, Population and Housing, it is anticipated that the local population could provide adequate skilled workers to satisfy the construction-related positions and there would be no need to relocate workers from other areas. Therefore, the presence of construction workers would not directly or indirectly result in new demands for additional libraries because the construction workers are not likely to relocate to areas near the site due to temporary employment. No impact would occur.

Long-Term Operational Impacts

Project inmates would not increase the use or demand for libraries in the City of Lancaster or the surrounding area, as the inmates would not be allowed off site. As set forth in PDF PS-2, the female inmate population would be served by the on-site library facilities that would be located in the Learning Center. There would be no opportunities for the female inmates to utilize public library facilities. The Project does not include residential land uses and would not therefore directly generate population growth that would result in additional demand for library services in the Project area. However, Project employees have the potential to indirectly generate a demand for library services if new residents are drawn to the area due to employment at the Project. Also, inmate family households may relocate to the area and indirectly generate a demand for library services if they move to the City of Lancaster or the Antelope Valley.

As discussed in Section 4.11, Population and Housing, under the most conservative scenario where all Project employees relocate from other places into the City of Lancaster, the 523 employees and households relocating into the area would equate to a maximum demand for 523 housing units. This demand could be slightly higher if inmate families decided to relocate to the City of Lancaster. Indirect housing demand would be easily met by the 4,912 vacant housing units in the City of Lancaster as of January 2015 (DOF 2015).

The County Library has indicated that the Lancaster Library meets the service level guidelines for facility size and reader seats, but not the guidelines for items (e.g., books and other library materials) per capita or computers. People moving to live in the area would create a demand for library services and people working in the area would create an indirect impact on library services. The Public Library applies a Library Facilities Mitigation Fee on new residential projects in unincorporated areas. Thus, library demand from homes located in unincorporated areas (and that may be occupied by Project employees or inmate family households) would have been paid during the initial construction of these homes. Library demand from homes in the City of Lancaster would have been met by payment of library facilities fees by residential development, as required by Section 15.64.140 of the Lancaster Municipal Code. These include existing vacant homes in the City that would likely be occupied by relocating households. Similarly occupancy of homes in the City of Palmdale would generate a demand for library services that would have been paid as part of the Public Facility Development Impact Fee imposed by the City in Section 3.45.0202 of the Palmdale Municipal Code. The Project would not generate significant adverse impacts on library services. No mitigation is required.

Threshold 4.12a: **Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities the construction of which would cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for:**
(ix) other public facilities?

Short-Term Construction Impacts

Construction activities for the Project would require County services related to building plan check and construction management. This demand would be temporary and minor and would not require new public facilities. Impacts would be less than significant and no mitigation is required.

Long-Term Operational Impacts

The Project would require 523 employees that would be hired by the County to maintain and operate the facility. These employees would be stationed at the Project site and the administration building and staff services building would provide offices, locker rooms, dining areas, and other facilities for staff. No other public facility would be needed for these employees. Impacts would be less than significant and no mitigation is required.

4.12.7 CUMULATIVE IMPACTS

The study area for cumulative impacts to public services includes the Antelope Valley, which encompasses the respective service areas of the LACFD, the Antelope Valley Health Care District, LASD, school districts (LSD, WUSD, EUSD, AVUHSD), the Lancaster Department of Parks and Recreation, and the County Library System.

The cumulative impacts associated with the development of the site along with cumulative projects may require additional staffing, equipment, and facilities for the LACFD and the LASD in order to maintain adequate levels of service and protection throughout the Project area. All future development projects in the County must comply with the County Fire Code to prevent the creation of fire hazards and to reduce the demands for fire protection and law enforcement services. Therefore, the incremental contribution of the Project on LACFD and LASD services would not result a cumulatively considerable impact to fire protection and law enforcement services. Increased demand for hospital services by the Project and cumulative projects is expected to be met by both public and private hospitals in the Antelope Valley.

School services, parks/recreation, and library services are all driven primarily by population growth. As discussed above and in Section 4.11, Population and Housing, of this EIR, the Project would not generate direct population growth and the new employment opportunities generated by the proposed Project would not equate with a need for new housing (due to the availability of vacant housing in the area) or associated public services in the Antelope Valley area. Therefore, because the proposed Project would not significantly contribute to the demand for schools, parks/recreation, or library services, there would be no cumulative impacts to these public services with implementation of the Project in addition to the cumulative projects identified in Tables 2-1 and 2-2 in Section 2.0, Environmental Setting.

The study area for cumulative impacts to other public facilities includes the Antelope Valley and the City of Lancaster. The demand for other public services would be driven primarily by population growth. As discussed above and in Section 4.11, Population and Housing, the proposed Project would not generate direct population growth and the new employment opportunities generated by the proposed Project would not equate with a need for new housing or associated public services in the Antelope Valley area. Therefore, because the proposed Project would not significantly contribute to the demand for other public facilities, there would be no cumulative impacts with implementation of the Project in addition to the cumulative projects identified in Tables 2-1 and 2-2 in Section 2.0, Environmental Setting.

Cumulative impacts on public services and recreation would be less than significant with compliance with existing regulations and no mitigation is required.

4.12.8 MITIGATION MEASURES

There would be no significant impacts to fire protection and emergency medical services, law enforcement services, school services, parks/recreation, or library services; therefore, no mitigation measures are required.

4.12.9 LEVEL OF SIGNIFICANCE AFTER MITIGATION

The Project would result in less than significant impacts related to public services and recreation. No significant unavoidable or cumulative impacts would occur.

4.12.10 REFERENCES

Antelope Valley Seventh-Day Adventist School. 2015 (March, last accessed). About Us. Lancaster, CA: Antelope Valley Seventh-Day Adventist School. <http://www.avaseagles.com/article/2/about-our-school>.

Antelope Valley Christian School (AVCS). 2014 (October 8, Last accessed). Welcome to Antelope Valley Christian School. Lancaster, CA: AVCS. <http://www.avcs.edu/>.

Antelope Valley College (AVC). 2015 (January 16, date accessed). Antelope Valley College Library, Using YOUR Library. Lancaster, CA: AVC. <http://avc.libguides.com/libraryservices>.

———. 2014. Academics. Lancaster, CA: AVC. <http://www.avc.edu/academics/>.

Antelope Valley Hospital (AVH). 2015 (May, access date). Services. Lancaster, CA: AVH. <http://avhospital.org/Services/Pages/default.aspx>.

Antelope Valley Surgery Center (AVSC). 2015 (May, access date). About Us. Lancaster, CA: AVSC. <http://www.antelopevalleysurgerycenter.com/AboutUs>.

Antelope Valley Union High School District (AVUHSD). 2014 (October 8, date accessed). Schools. Lancaster, CA: AVUHSD. http://www.avdistrict.org/apps/pages/index.jsp?uREC_ID=244406&type=d&pREC_ID=565177.

Bethel Christian School (BCS). 2014 (October 6, Last accessed). About Bethel Christian School. Lancaster, CA: BCS. <http://www.bethelchristian.net/about/>.

California Department of Finance (DOF). 2015 (May 1). E-5 Population and Housing Estimates for Cities, Counties, and the State, January 1, 2011 – 2015. Sacramento, CA: DOF.

California Department of Forestry and Fire Protection (CAL FIRE). 2011 (September). Los Angeles County – Very High Fire Hazard Severity Zones in LRA as Recommended by CAL FIRE. Sacramento, CA: CAL FIRE.

Charter College. 2015 (May, access date). Charter College Lancaster. Lancaster, CA: Charter College. <http://www.chartercollege.edu/locations/lancaster-ca>.

Desert Christian Schools (DCS). 2014a (October 8, last accessed). About Us. Lancaster, CA: DCS. <http://www.desertchristian.com/about-us/index.cfm>.

-
- . 2014b (October 8, Last accessed). Desert Christian High School. Lancaster, CA: DCS. <http://www.desertchristian.com/academics/high-school.cfm>.
- Kaiser Permanente. 2015 (January 16, date accessed). Antelope Valley: Emergency and Urgent Care. Oakland, CA: Kaiser Permanente. <http://southerncalifornia.kaiserpermanente.org/antelopevalley/emergency-urgent-care/>.
- Lancaster, City of. 2015 (January 13, last update). *Lancaster, California Code of Ordinances*. Tallahassee, FL: Municipal Code Corporation for the City. <http://library.municode.com/index.aspx?clientId=16042&stateId=5&stateName=California>.
- . 2010 (December 28, last update). Rawley Duntley Park. Lancaster, CA: Lancaster. <http://www.cityoflancasterca.org/Index.aspx?page=50>
- . 2009a (July 14, adopted). *City of Lancaster General Plan 2030*. Lancaster, CA: the City. <http://www.cityoflancasterca.org/Index.aspx?page=427>.
- . 2009b (April). *General Plan 2030 Master Environmental Assessment*. Lancaster, CA: Lancaster.
- Los Angeles, County of. 2015 (current through). *Los Angeles County, California – Code of Ordinances*. Tallahassee, FL: Municipal Code Corporation for the County. https://www.municode.com/library/ca/los_angeles_county.
- Los Angeles County Department of Health Services (DHS). 2015 (January 16, date accessed). High Desert Regional Health Center. Los Angeles, CA: Los Angeles County DHS. <http://dhs.lacounty.gov/wps/portal/dhs/highdesert>.
- Los Angeles County Department of Parks and Recreation (LACDPR). 2014 (November 14, date accessed). Apollo Community Regional Park. Los Angeles, CA: LACDPR. http://parks.lacounty.gov/wps/portal/dpr/Parks/Apollo_Community_Regional_Park.
- Los Angeles County Department of Regional Planning (LACDRP). 2015 (March). General Plan 2035. Los Angeles, CA: LACDRP. <http://planning.lacounty.gov/generalplan/draft>.
- . 2014 (November). *Draft Antelope Valley Area Plan: Town & Country*. Los Angeles, CA: LACDRP. <http://planning.lacounty.gov/tnc/documents/>.
- . 1986 (December 4). *Antelope Valley Areawide General Plan*. Los Angeles, CA: LACDRP.
- Los Angeles, County of, Public Library (County Library). 2015a (May, access date). Hours and Locations. Los Angeles, CA: County Library. <http://www.colapublib.org/libs/>.
- . 2015b (May, access date). Lancaster Library. Los Angeles, CA: County Library. <http://www.colapublib.org/libs/lancaster/index.php>.
- . 2015c (May, access date). Quartz Hill Library. Los Angeles, CA: County Library. <http://www.colapublib.org/libs/quartzhill/index.php>.
- Los Angeles County Fire Department (LACFD). 2014 (December 2). Personal communication. Correspondence from L. Bagwell (LACFD) to D. Sarraf (BonTerra Psomas). Los Angeles, CA: LACFD.

- Los Angeles County Sheriff's Department (LASD). 2015 (January 16, date accessed). Los Angeles County Sheriff's Department Lancaster Station, About Us. Monterey Park, CA: LASD. <http://shq.lasdnews.net/content/uoa/LAN/lacasterPhoneNos.pdf>
- . 2014a (October 5). *Patrol Station Part I Crime Summary, YTD 09/30/2014 – Part I Crime Rate Per 10,000 Population – Preliminary Data*. Monterey Park, CA: LASD.
- . 2014b (October 15). *Review Comments, Initial Study and Notice of Preparation of an Environmental Impact Report, Mira Loma Detention Center Women's Facility Project*. Monterey Park, CA: LASD.
- Nadela, C. 2014 (December 4). Personal Communication. Telephone conversation between C. Nadela, Senior Regional Planner (County of Los Angeles Department of Regional Planning) and D. Sarraf, Environmental Planner (BonTerra Psomas).
- Palmdale, City of. 2015 (February, current through). *Palmdale Municipal Code*. Seattle, WA: Code Publishing Company for the City. <http://www.codepublishing.com/ca/palmdale.html>.
- Palmdale Regional Medical Center (PRMC). 2014 (October, access date). About the Hospital. Palmdale, CA: PRMC. <http://www.palmdaleregional.com/patients-and-visitors/about-the-hospital>.
- Paraclete High School (PHS). 2014 (October 8, Last accessed). Paraclete High School. Lancaster, CA: PHS. <http://www.paracletehs.org/>.
- Pinecrest Schools. 2015 (May, access date). Lancaster Campus. Sherman Oaks, CA: Pinecrest Schools. <http://www.pinecrestschools.com/lancaster/>.
- San Joaquin Valley College (SJVC). 2014 (October 7, last accessed). SJVC Antelope Valley: Antelope Valley (Lancaster) Campus. Lancaster, CA: SJVC. <http://lancaster.sjvc.edu/>.
- University of Antelope Valley (UAV). 2014. Programs and Degrees. Lancaster, CA: UAV. <http://www.uav.edu/index.aspx?page=3>.
- University of Phoenix. 2014 (October, access date). Lancaster Learning Center. Lancaster, CA: University of Phoenix. <http://www.phoenix.edu/campus-locations/ca/southern-california-campus/lancaster-learning-center.html>.
- West Coast Baptist College (WCBC). 2014 (October 7, Last accessed). About Us. Lancaster, CA: WCBC. <http://wcbc.edu/about-us>.
- Westside Union School District (WUSD). 2014. Schools of Westside. Quartz Hill, CA: WUSD. <http://westside.k12.ca.us/schools>.

This page intentionally left blank

4.13 TRANSPORTATION AND TRAFFIC

Existing traffic conditions in the planning area and the potential traffic impacts of the proposed Project are evaluated in the Traffic Impact Study prepared by Linscott, Law and Greenspan (LLG) in April 2015. The findings of the Traffic Impact Study are summarized below, and the study is included in Appendix H of this EIR.

The Traffic Impact Study for the proposed Mira Loma Women's Detention Center (MLWDC) was developed using the methods summarized below and discussed in detail in the study. The methodology for this analysis was approved by both the City of Lancaster and County of Los Angeles Public Works staffs following consultation.

Traffic Performance

In accordance with the City of Lancaster's traffic study guidelines and consistent with traffic impact assessment guidelines in the 2010 Congestion Management Program (CMP) for Los Angeles County, the Traffic Impact Study evaluates the levels of service during the weekday morning and afternoon peak hours at ten intersections. The intersections were selected based on their proximity to the site and those documented to have current or projected future adverse operational issues or that are forecasted to experience a relatively greater percentage of project-related turning movements. The intersection analysis utilizes the Intersection Capacity Utilization (ICU) method that determines the Volume-to-Capacity (V/C) ratio and corresponding Level of Service (LOS) to describe intersection operations.

Level of Service varies from LOS A (free flow) to LOS F (jammed condition). Table 4.13-1 defines and describes the LOS for roadway intersections and the corresponding Load Factor and Equivalent ICU for each LOS. Load Factor is the proportion of the signal cycles during the peak hour which are fully loaded (i.e., when all of the vehicles waiting at the beginning of green phase are not able to clear on that green phase). The ICU represents the proportion of the total hour required to accommodate intersection demand volumes if the key conflicting traffic movements are operating at capacity.

**TABLE 4.13-1
LEVEL OF SERVICE DEFINITIONS**

LOS	Intersection Description	V/C Ratio	Load Factor	Equivalent ICU
A	There are no loaded cycles and few are even close to loaded at this service level. No approach phase is fully utilized by traffic and no vehicle waits longer than one red indication.	0.00–0.60	0.0	0.00–0.60
B	This level represents stable operation where an occasional approach phase is fully utilized and a substantial number are approaching full use. Many drivers begin to feel restricted within platoons of vehicles.	>0.60–0.70	0.0–0.1	0.61–0.70
C	At this level stable operation continues. Loading is still intermittent but more frequent than at LOS B. Occasionally drivers may have to wait through more than one red signal indication and backups may develop behind turning vehicles. Most drivers feel somewhat restricted, but not objectionably so.	>0.70–0.80	0.1–0.3	0.71–0.80

**TABLE 4.13-1
LEVEL OF SERVICE DEFINITIONS**

LOS	Intersection Description	V/C Ratio	Load Factor	Equivalent ICU
D	This level encompasses a zone of increasing restriction approaching instability at the intersection. Delays to approaching vehicles may be substantial during short peaks within the peak hour, but enough cycles with lower demand occur to permit periodic clearance of queues, thus preventing excessive backups. Drivers frequently have to wait through more than one red signal. This level is the lower limit of acceptable operation to most drivers.	>0.80–0.90	0.3–0.7	0.81–0.90
E	This represents near capacity and capacity operation. At capacity (ICU = 1.0) it represents the most vehicles that the particular intersection can accommodate. However, full utilization of every signal cycle is seldom attained no matter how great the demand. At this level all drivers wait through more than one red signal, and frequently through several.	>0.90–1.00	0.7–1.0	0.91–1.00
F	Jammed conditions. Traffic backed up from a downstream location on one of the street restricts or prevents movement of traffic through the intersection under consideration.	>1.00	N/A	N/A

LOS: level of service; V/C: volume-to-capacity; ICU: Intersection Capacity Utilization; N/A: not applicable
Source: LLG 2015

It should be noted that LOS D is typically recognized as the minimum acceptable level of service in urban areas.

Trip Generation Estimate

A comprehensive review was conducted of the Project's potential vehicular trip generation comparing a modeled trip generation forecast (i.e., based on site-specific employee numbers and shift times, expected visitation figures, and expected service and delivery data, among other factors) with a forecast based on published industry-standard trip generation rates published by the Institute of Transportation Engineers (ITE). The traffic volumes expected to be generated by the proposed Project during the commuter weekday AM and PM peak hours (which are the time periods when the adjacent street system is most heavily constrained) were found to be higher using rates published in the ITE Trip Generation Manual. Using ITE rates is also in accordance with the City of Lancaster traffic study guidelines.

The Project's employee shift changes would not coincide with the AM or PM peak period of the adjacent street system (i.e., the commuter peak hours), but the forecasted AM and PM peak hour Project traffic volumes account for all user-type trips (e.g., service vehicles, medical personnel, court personnel, inmate attorney consultations, inmate transport). Thus, application of the ITE trip rates during the peak hours was considered conservative for purposes of complying with the City of Lancaster's analysis criteria.

Traffic volumes expected to be generated by the proposed Project during the peak hours were therefore based on ITE Land Use Code 571 (Prison) trip generation rates to conservatively forecast the weekday AM and PM peak hour traffic volumes expected to be generated by the Project.

However, the estimate of the Project's daily trip generation was based on specific data provided by the Los Angeles County Sheriff's Department and includes employee shift times, number of employees per shift, frequency of inmate transport buses, and miscellaneous service/delivery

vehicles, among other factors. In addition, as inmate visitation is by appointment only during the weekends and holidays, the weekend daily trip generation for the Project was also forecasted based on a review of existing visitation levels at the Century Regional Detention Facility (CRDF) located in the City of Lynwood and site-specific data at the Project site as provided by the Sheriff's Department.

Daily trip estimates on weekdays assume a total of 523 staff personnel at the site during 3 shifts over a typical 24-hour weekday period; an average vehicle ridership of 1.135 staff members per vehicle; 4 inmate transport buses per day with a passenger car equivalency (PCE) factor of 2.0; and miscellaneous vehicle trips due to service/delivery, medical delivery, and court personnel transport at no more than 25 vehicles per weekday with a PCE factor of 2.0.

Weekend daily trips include the same staff commutes and inmate transport buses; miscellaneous vehicle trips on the weekends at $\frac{1}{2}$ of a typical weekday; and inmate visitation at 39 percent of the available appointment slots or about 28,543 visits per year (the same rate as existing at the CRDF). Forecasts assume 250 inbound visitor trips and 250 outbound visitor trips per day during the 114 weekend days and holidays per year.

Traffic Analysis

The Project's traffic impacts were analyzed under four scenarios for the weekday AM and PM peak hours:

- Existing Conditions
- Existing plus Project Conditions
- Future Pre-Project Conditions
- Future with Project Conditions

The Existing Conditions plus a 1.0 percent ambient traffic growth through Year 2019 plus traffic from the cumulative projects is considered the Future Pre-Project conditions.

Based on the regional trip distribution approved by City of Lancaster staff, a nominal amount of Project traffic is expected to be generated to/from points westerly from the site since regional access is provided by State Route (SR) 14, located east of the Project site. Therefore, other corridors located west of the site (e.g., 70th Street West) were not included in the traffic analysis.

Weekend (Saturday) midday peak period manual traffic counts (i.e., from 12:00 PM to 3:00 PM) were conducted at the two intersections closest to the Project site. The weekend peak period traffic counts were conducted in February 2015 at both the 60th Street West/West Avenue I and 60th Street West/West Avenue J intersections and showed significantly lower weekend midday traffic volumes when compared to both the weekday AM and PM commuter peak hours. The counts showed approximately 30 percent lower traffic volumes during the weekend midday peak hour compared to the weekday PM peak hour. Since system-wide traffic volumes are considerably lower on weekends than weekdays, no further analysis of weekend conditions is required or warranted.

Ramp Queuing

Potential vehicle queuing on the SR-14 northbound and southbound off-ramps at West Avenue I was also reviewed. The analysis was based on the latest edition of the 2010 Highway Capacity Manual (HCM) operational analysis methods pursuant to the California Department of

Transportation's (Caltrans') Guide for the Preparation of Traffic Impact Studies. The queuing analysis was prepared using the Synchro 8 software package, which implements the HCM operational methods.

4.13.1 RELEVANT PROGRAMS AND REGULATIONS

A number of programs and regulations have been adopted by regional, County, and local agencies to promote the efficient transport of people or goods in the region. Those that have direct relevance to traffic and circulation issues for the Project are summarized below.

State

Senate Bill 743

On September 27, 2013, Governor Brown signed Senate Bill (SB) 743, which creates a process to change the analysis of transportation impacts under the California Environmental Quality Act (CEQA). On December 30, 2013, the California Office of Planning and Research (OPR) released a preliminary evaluation of alternative methods of transportation analysis. In August 2014, the OPR released a Preliminary Discussion Draft of Updates to CEQA Guidelines Implementing SB 743. The report recommends amendments to the CEQA Guidelines to replace the Level of Service (LOS), auto-delay-based standard with other metrics to measure transportation impacts; these other metrics may include, but are not limited to, vehicle miles traveled (VMT), vehicle miles traveled per capita, and automobile trips generated in order to align CEQA analyses more closely with other State goals, most notably the greenhouse gas emission reduction goals contained in the State's climate change law, Assembly Bill (AB) 32.

The SB 743 legislation does not authorize OPR to set thresholds, but it does direct OPR to develop guidelines for determining the significance of transportation impacts for projects. OPR is expected to circulate a revised guidance document sometime in 2015. The current schedule has the adoption of the OPR amendment to the CEQA Guidelines by sometime after January 2016, thus no specific significance thresholds have yet been adopted for purposes of complying with SB 743. In addition, the OPR guidance does not preclude an agency from establishing their own significance thresholds prior to the adoption of the OPR amendment to the CEQA Guidelines and/or permitting additional analysis beyond the typical auto delay based standards in the interim.

Neither the City of Lancaster nor the County of Los Angeles have specifically adopted elements of SB 743 into their current traffic study guidelines.

Regional/County

Regional Transportation Plan/Sustainable Communities Strategy

The 2012–2035 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) addresses the region's future needs for "mobility, economy, and sustainability". The RTP/SCS combines the need for mobility with a "sustainable future" through a reduction in the amount of emissions produced from transportation sources through the operation of low or no emission transportation systems by 2035. The RTP/SCS also focuses on the economy with expectations of shortening the gap between the regional transportation system and economic vitality.

To address the mobility challenge of the region's continuing roadway congestion, transportation investments will be made in transit; passenger and high-speed rail; active transportation; transportation demand management; transportation systems management; highways; arterials; goods movement; aviation and airport ground access; and operations and maintenance projects.

These will indirectly create investment opportunities in the region. The RTP/SCS seeks to reduce GHG emissions; to create closer “high quality” transit for households; to decrease roadway congestion; to improve safety; and to generate over 500,000 jobs per year. This will improve and establish a platform for sustainable living situations for the region’s existing and future population (SCAG 2012).

Federal Transportation Improvement Program

The Federal Transportation Improvement Program (FTIP) pulls together a prioritized list of transportation projects for the Southern California Association of Governments (SCAG) region that would implement the RTP/SCS’s policies, programs, and projects for improving the mobility, efficiency, and safety of the transportation system, while reducing transportation-related air pollution. The 2015 FTIP includes transportation projects that would be implemented within the next six years: highway improvements; transit, rail, and bus facilities; high occupancy vehicle lanes; signal synchronization; intersection improvements; freeway ramps; and non-motorized projects. The FTIP is prepared in compliance with federal and State requirements and is submitted to Caltrans and federal funding agencies. The 2015 Federal Statewide Transportation Improvement Program (FSTIP), which includes SCAG’s 2015 FTIP, was approved by the Federal Highway Administration (FHWA) and Federal Transit Administration (FTA) on December 15, 2014 (FHWA 2014).

Projects located near the site that are listed in 2015 FTIP include interchange overpass improvements on West Avenue L/SR-14; the West Avenue L gap closure from 60th Street West to 30th Street West; widening of 30th Street West from Avenue M to Avenue L; Avenue I corridor improvements; several SR-14 interchange improvement projects; traffic signal modernization; and transit improvements.

Congestion Management Program for Los Angeles County

The Los Angeles County Metropolitan Transportation Authority (Metro) has developed and implements the Congestion Management Program (CMP) for Los Angeles County. The CMP was last updated in 2010 and links transportation, land use, and air quality decisions in the County and addresses the impact of local growth on the regional transportation system. The CMP calls for (1) monitoring the CMP highway and roadway system; (2) a multi-modal system performance analysis; (3) a Transportation Demand Management Program to promote alternative modes of transportation; (4) a Land Use Analysis Program; (5) a seven-year capital improvement program of projects on the CMP highway and roadway system; and (6) a deficiency plan to maintain LOS standards.

The CMP requires monitoring of land use and roadway performance by individual jurisdictions and provides guidelines for conducting a Traffic Impact Analysis (TIA). The CMP sets the LOS standard in Los Angeles County at LOS E, except where base year LOS is worse than E. The CMP highway system includes SR-14 and SR-138 in the Antelope Valley. The SR-14 and SR-138 intersections operated at LOS D or better during the AM and PM peak hours in 2009 (Metro 2010).

Local

Lancaster General Plan

The Lancaster General Plan includes a Plan for Physical Mobility that address transportation and circulation in the City. The Plan includes goals, objectives, policies, and actions to create and maintain a well-balanced transportation and circulation system that balances the need for free traffic flow with economic realities; protects environmental, aesthetic, and quality of life issues;

addresses the supply and demand for parking; promotes alternatives to the single-occupant automobile; safely moves commodities; and promotes air transportation services. The General Plan sets the minimum acceptable LOS standard for roadway segments at LOS D during peak hour traffic.

Lancaster Municipal Code

Title 10 of the Lancaster Municipal Code is the City's Traffic Code, which regulates traffic control devices and signs on public roads; parking restrictions; restrictions on use of public roadways; parking regulations for vehicles transporting hazardous materials; and temporary (construction) traffic controls and road closures.

4.13.2 EXISTING CONDITIONS

Freeway and Roadway System

Regional access to the site is provided by the Antelope Valley Freeway (SR-14/SR-138).

SR-14/SR-138 is a major north-south freeway connecting the Cities of Lancaster, Palmdale, and Santa Clarita to the City of Los Angeles via the Golden State Freeway (Interstate [I] 5) to the south. SR-14/SR-138 has two to three mainline freeway lanes in each direction in Lancaster. High occupancy vehicle (HOV) lanes are provided on the freeway during the weekday morning peak periods (5:00 AM to 9:00 AM) in the southbound direction and during the weekday afternoon peak periods (3:00 PM to 7:00 PM) in the northbound direction. Approximately 3.4 miles east of the site, there are northbound and southbound on- and off-ramps on SR-14/SR-138 at West Avenues G, H, I, and K. At West Avenue J, only a southbound off-ramp and a northbound on-ramp are provided.

Local streets generally form a grid system, with letter streets running in an east-west direction and number streets in a north-south direction. Division Street serves as the boundary between East and West street prefixes and suffixes.

60th Street West is a north-south roadway along the site's western boundary. The City of Lancaster Master Plan of Streets and Highways classifies 60th Street West as a "Regional Arterial" between West Avenue G and West Avenue L. It has one to two travel lanes in each direction near the site. Separate (exclusive) left-turn lanes are provided on 60th Street West at both the West Avenue I and West Avenue J intersections. In the immediate vicinity of the California State Prison, Los Angeles County (CSP-LAC) driveway on 60th Street West, the northbound approach provides two through travel lanes and one right-turn only lane and the southbound approach provides one left-turn lane and one through travel lane. The two northbound through travel lanes extend to the southern HDHS MACC facility driveway, where it then transitions to one northbound through travel lane via formal lane drop pavement markings and signage.

50th Street West is a north-south roadway east of the Project site. The City of Lancaster Master Plan of Streets and Highways classifies 50th Street West as a Major Arterial. It has one to two travel lanes in each direction near the site, with separate (exclusive) left-turn lanes at major intersections. At its intersection with West Avenue J, separate right-turn only lanes are provided.

30th Street West is a north-south roadway east of the Project site. The City of Lancaster Master Plan of Streets and Highways classifies 30th Street West as a Major Arterial. It has two to three travel lanes in each direction near the site, with dual left-turn lanes and exclusive right-turn only lanes in both directions at the West Avenue I intersection.

Valley Central Way is a north-south discontinuous roadway that extends from north of West Avenue I southerly to West Avenue J, just west of SR-14. The City of Lancaster Master Plan of Streets and Highways classifies Valley Central Way as a Secondary Arterial. It has two travel lanes in each direction near the site, with separate (exclusive) left-turn lanes at major intersections. A dedicated bicycle lane is also provided along the east side of Valley Central Way, north of West Avenue J.

West Avenue I is an east-west roadway along the site's northern boundary. The City of Lancaster Master Plan of Streets and Highways classifies West Avenue I as a Regional Arterial between 60th Street West and SR-14 and as a Major Arterial for the remainder of the roadway. It has two to three travel lanes in each direction near the site, with separate (exclusive) left-turn lanes at major intersections and dual left-turn lanes at several locations (e.g., at the 30th Street West intersection).

West Avenue J is an east-west roadway south of the Project site. The City of Lancaster Master Plan of Streets and Highways classifies West Avenue J as a Major Arterial. It has two travel lanes in each direction near the site, with separate (exclusive) left-turn lanes. At its intersection with 60th Street West, separate right-turn-only lanes are also provided.

Access to the site is provided by existing driveways on 60th Street West and West Avenue I. There are four driveways on 60th Street West and two driveways on West Avenue I. The two southern driveways on 60th Street West provide access to the parking lot for the former HDHS MACC facility. The two northern driveways on 60th Street West and the two driveways on West Avenue I provide access to the Mira Loma Detention Center (MLDC).

Intersection Analysis

The analysis of traffic impacts focuses on ten intersections near the site, which have been selected based on coordination with City of Lancaster staff and their approval. Two of these intersections are under Caltrans jurisdiction. These intersections are controlled by traffic signals, and the lane configurations of these intersections are shown in Exhibit 4.13-1, Existing Lane Configurations.

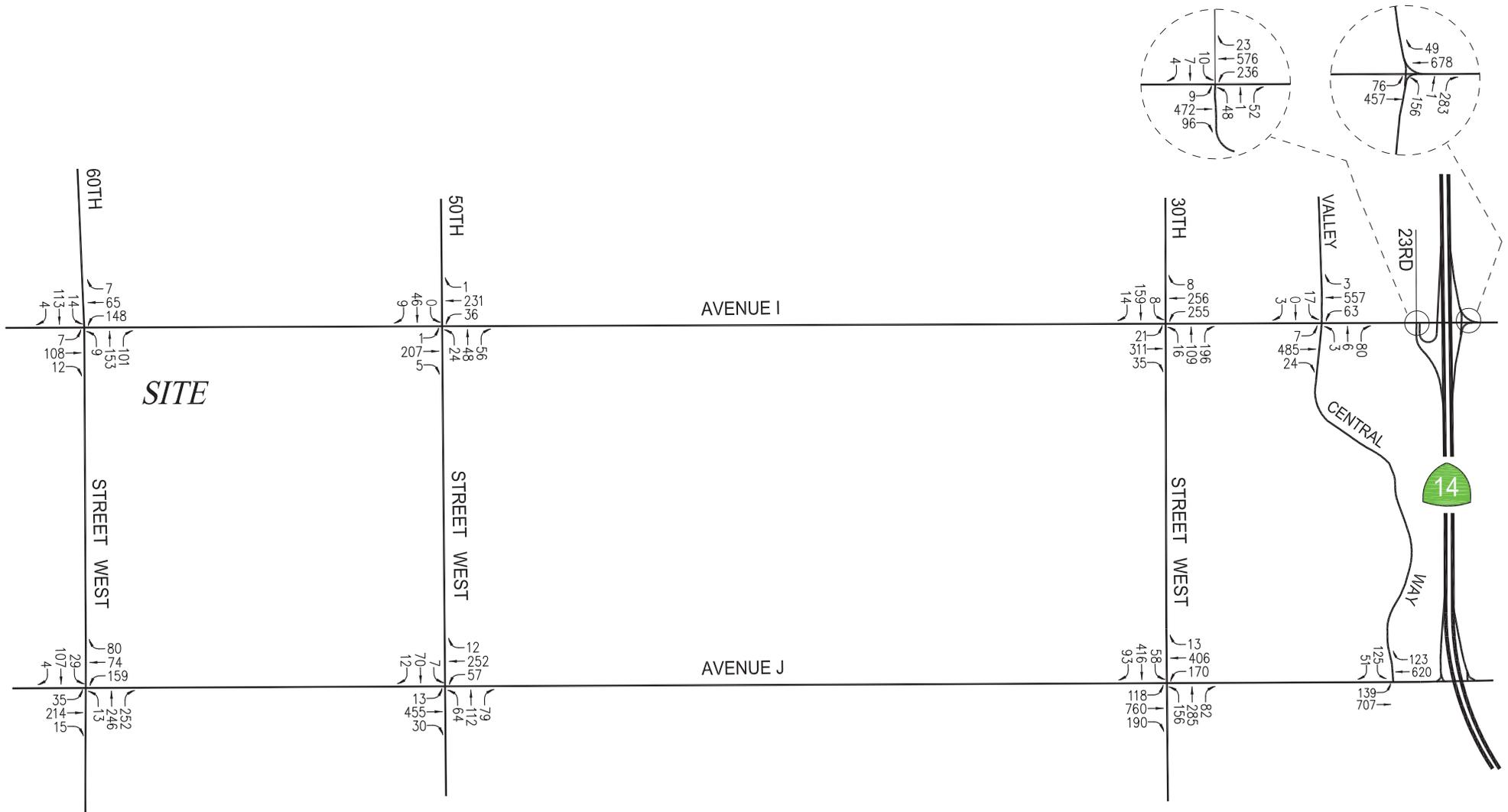
Manual intersection traffic counts were collected during the weekday morning (AM) and afternoon (PM) commuter periods in April 2015 to determine existing intersection operations when the street system is most heavily constrained. Table 4.13-2 shows existing traffic volumes (number of vehicles per hour) during the AM peak hours (7:00 AM to 9:00 AM) and PM peak hours (4:00 PM to 6:00 PM) for each leg of the study intersections.

**TABLE 4.13-2
EXISTING TRAFFIC VOLUMES**

Intersection	Date	Direction	AM Peak Hour		PM Peak Hour	
			Time Began	Volume	Time Began	Volume
1 60 th St West/West Ave I	4/16/2015	NB SB EB WB	7:00 AM	263 131 127 220	4:00 PM	222 168 125 134
2 60 th St West/West Ave J	4/16/2015	NB SB EB WB	7:00 AM	511 140 264 313	4:30 PM	181 305 112 255
3 50 th St West/West Ave I	4/16/2015	NB SB EB WB	7:00 AM	128 55 213 268	4:00 PM	74 96 286 172
4 50 th St West/West Ave J	4/16/2015	NB SB EB WB	7:00 AM	255 89 498 321	5:00 PM	135 129 252 380
5 30 th St West/West Ave I	4/16/2015	NB SB EB WB	7:00 AM	321 181 367 519	4:30 PM	230 157 311 388
6 30 th St West/West Ave J	4/16/2015	NB SB EB WB	7:00 AM	523 567 1068 589	5:00 PM	526 487 488 859
7 Valley Central Way/West Ave I	4/16/2015	NB SB EB WB	7:00 AM	89 20 516 623	4:15 PM	281 26 446 636
8 Valley Central Way/West Ave J	4/16/2015	NB SB EB WB	7:15 AM	0 176 846 743	4:30 PM	0 590 616 1386
9 23 rd St West/SR-14 SB ramps/ West Ave I	4/16/2015	NB SB EB WB	7:00 AM	101 21 577 835	4:30 PM	223 94 673 912
10 SR-14 NB ramps/West Ave I	4/16/2015	NB SB EB WB	7:00 AM	440 0 533 727	4:30 PM	510 0 637 890
SR: State Route; NB: northbound; SB: southbound; EB: eastbound; WB: westbound						
Source: LLG 2015						

Existing traffic volumes at these intersections during the AM peak hour on weekdays are shown in Exhibit 4.13-2, Existing AM Peak Hour Volumes. Existing traffic volumes during the PM peak hour on weekdays are shown in Exhibit 4.13-3, Existing PM Peak Hour Volumes.

Based on intersection capacity, traffic volumes, and turning movements, the existing LOS operations at the study intersections are provided in Table 4.13-3. As shown, all intersections are operating at LOS A or B during the AM and PM peak hours.



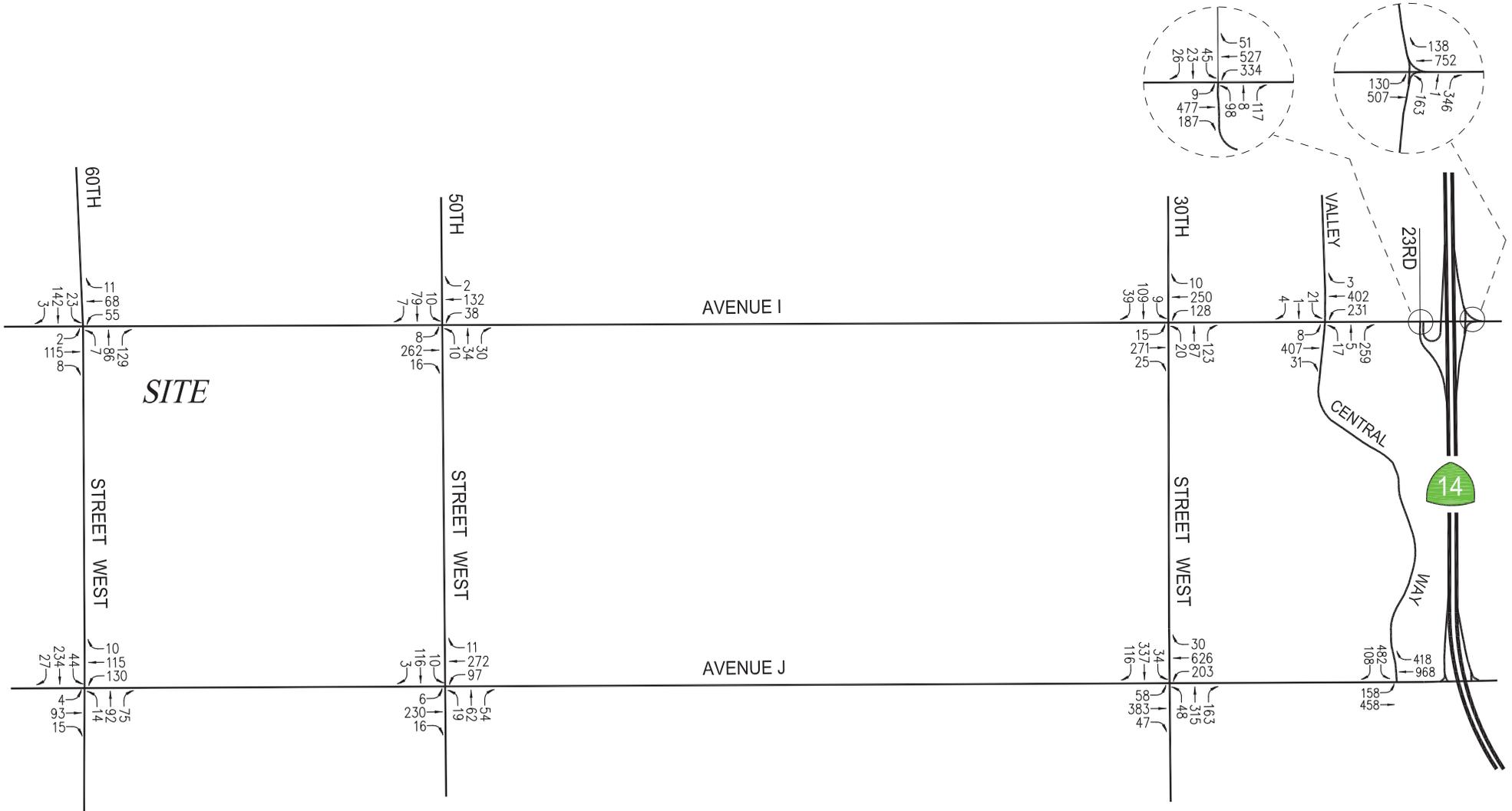
Source: LLG 2015

Existing AM Peak Hour Volumes

Exhibit 4.13-2

Mira Loma Women's Detention Center





Source: LLG 2015

Existing PM Peak Hour Volumes

Exhibit 4.13-3

Mira Loma Women's Detention Center



**TABLE 4.13-3
EXISTING INTERSECTION LOS**

No.	Intersection	Peak Hour	Existing Condition	
			V/C	LOS
1	60 th St West/West Ave I	AM	0.372	A
		PM	0.306	A
2	60 th St West/West Ave J	AM	0.442	A
		PM	0.382	A
3	50 th St West/West Ave I	AM	0.320	A
		PM	0.358	A
4	50 th St West/West Ave J	AM	0.523	A
		PM	0.399	A
5	30 th St West/West Ave I	AM	0.292	A
		PM	0.232	A
6	30 th St West/West Ave J	AM	0.608	B
		PM	0.456	A
7	Valley Central Way/West Ave I	AM	0.239	A
		PM	0.288	A
8	Valley Central Way/West Ave J	AM	0.359	A
		PM	0.568	A
9	23 rd Street West/SR-14 SB ramps/West Ave I	AM	0.304	A
		PM	0.398	A
10	SR-14 NB ramps/West Ave I	AM	0.386	A
		PM	0.446	A

V/C: volume-to-capacity ratio; LOS: level of service; NB: northbound; SB: southbound.
Source: LLG 2015

Alternative Transportation

Alternative transportation systems in the City of Lancaster include bus transit, passenger train, airport, and bicycle lanes.

Bus Transit

Public bus transit services in the high desert area in the Cities of Lancaster and Palmdale is provided by the Antelope Valley Transit Authority (AVTA). These services include local fixed-route buses; on-demand dial-a-ride services; and longer-distance commuter coach services to the West San Fernando Valley, Century City/West Los Angeles, and Downtown Los Angeles. AVTA Bus Route 7 runs along the site boundaries on 60th Street West and travels between the Palmdale Transportation Center to the Lancaster Metrolink Station through the Antelope Valley Mall, several high schools, and the Antelope Valley Fairgrounds (AVTA 2014b). Two bus headways run in the northbound direction and one bus headway runs in the southbound direction during the AM peak hours and one bus headway runs in each direction during the PM peak hours.

In the Project vicinity, AVTA Route 7 has two stops along 60th Street West: one located south of the CSP-LAC and the other in the parking lot of the former HDHS MACC facility. AVTA Route 7 ridership data shows that, in 2014, there were approximately 600 boardings during the typical weekday and 282 boardings during the typical weekend (Saturday).

Other bus routes running near the site include AVTA Bus Route 12, 11, and 5, with Routes 11 and 5 having connections to AVTA Bus Route 7 (AVTA 2014a).

Passenger Train

Passenger train service in the City of Lancaster is provided by Metrolink trains. The closest Metrolink station is the Lancaster Station at the intersection of Sierra Highway and Lancaster Boulevard (44812 Sierra Highway), approximately 5.0 miles east of the site. The trains run southbound from this station to Union Station in Downtown Los Angeles nine times per day and northbound from Union Station to the Lancaster station also nine times per day on weekdays. Six trains run to and from the Lancaster Station on weekends (Metrolink 2014). There is one train running in each direction during the AM peak hour and two trains running northbound during the PM peak hour on weekdays.

The City of Lancaster considered the closure of the Lancaster Metrolink Station in mid-2014 but is instead, currently working with Metrolink, Metro, and the County to address security and transient issues at the station (Lancaster 2015a).

Airport

The nearest airport to the site is the General William J. Fox Airfield, which is located 2.3 miles north of the site. This general aviation airport is owned by the County of Los Angeles and serves as a flight training facility for aircraft and pilots from the Los Angeles Basin and as an air attack base for U.S. Forest Service firefighting aircraft (Los Angeles County ALUC 2004). This airport has 154 based aircraft and an average of 224 aircraft operations per day (AirNav 2015).

Bicycle Lanes

The City of Lancaster has no existing or proposed bikeways on 60th Street West and West Avenue I along the site boundaries (Lancaster 2009b).

4.13.3 THRESHOLDS OF SIGNIFICANCE

The following significance criteria are derived from the Environmental Checklist in Appendix G of the State CEQA Guidelines. The Project would result in a significant adverse impact related to Transportation if it would:

- Threshold 4.13a:** Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit.
- Threshold 4.13b:** Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways.
- Threshold 4.13c:** Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks.
- Threshold 4.13d:** Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).
- Threshold 4.13e:** Result in inadequate emergency access.

Threshold 4.13f: Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities.

Jurisdictions generally set an LOS standard for roadway segments and/or intersections to determine when improvements to the roadway network are needed. The LOS standards for the City of Lancaster are used in the analysis of traffic impacts from the Project. Based on City of Lancaster requirements, the ICU calculations use a lane capacity of 1,600 vehicles per hour (vph) for left-turn, through, and right-turn lanes and 2,880 vph for dual left-turn lanes. A clearance interval of 0.10 is also included in the ICU calculations.

The City of Lancaster traffic study guidelines indicate that a significant impact would occur in the City of Lancaster when the V/C ratio at a signalized intersection equals or exceeds 0.900 (LOS E or F) and the Project-related increase in the V/C ratio or delay is equal to or greater than 0.020. The City requires mitigation of Project traffic impacts whenever traffic generated by a proposed development causes an increase of the analyzed intersection V/C ratio by 0.020 or greater.

4.13.4 PROJECT DESIGN FEATURES

PDF TRA-1 The Contractor's Specifications will require that the Vehicular access to the Project will be via two existing driveways: one at 60th Street West south of West Avenue I and one at West Avenue I. The site access driveways will be stop-sign controlled with a stop-sign facing the minor street approach (i.e., at the Project driveway). The Project driveways will have one inbound travel lane and one outbound travel lane. As determined by the County of Los Angeles Department of Public Works improvements to driveways to accommodate ingress/egress, including new curb and gutter improvements, may be required.

PDFs GHG-2, GHG-3, and GHG-4 from Section 4.6, Greenhouse Gas Emissions, are also applicable to this analysis.

4.13.5 REGULATORY REQUIREMENTS

There are existing City, State, and regional regulations that relate to transportation and the prevention of traffic congestion. Compliance with these regulations would be required for the Project. These include the Regulatory Requirements (RRs) listed below.

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

RR TRA-2 The Project's construction activities on public rights-of-way will be conducted in accordance with the current Standard Specifications for Public Works Construction (Greenbook) and Additions and Amendments to the Standard Specifications for Public Works Construction (Graybook), including Traffic Control Provisions.

RR TRA-3 For any off-site traffic or parking-related activities within the City of Lancaster, the Project's construction activities will be conducted in accordance with the City of Lancaster's Traffic Code (Title 10 of the Lancaster Municipal Code), related to vehicle parking on public roads; construction traffic signs and traffic control; and other related regulations.

4.13.6 ENVIRONMENTAL IMPACT ANALYSIS

Threshold 4.13a: **Would the project conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?**

Short-Term Construction Impacts

The Project would generate new vehicle trips from (1) demolition, renovation, and construction activities from construction worker travel and (2) trucks arriving and departing the site to deliver construction materials and remove debris generated by on-site demolition/grading activities. Both the number of construction workers and trucks would vary throughout the construction phase in order to maintain a reasonable schedule of completion. The hours of construction for the Project would be between 7:00 AM and 7:00 PM daily, except Sundays and holidays (per County regulations). In order to provide a more conservative (i.e., higher) forecast of potential hourly construction traffic trip generation, an 8-hour weekday workday was assumed. Thus, it is assumed that the majority of the workers will work within one shift starting by 7:00 AM and concluding by 4:00 PM (with some workers ending their workday before 4:00 PM).

The total construction period for the Project is anticipated to extend for approximately 35 months, from December 2016 to the fourth quarter of 2019. During construction, existing driveways off West Avenue I and 60th Street West will be available for contractor ingress and egress. Assumptions on construction activities that were provided by the County include:

- Demolition activities are anticipated to last approximately 12 weeks involving up to 14 daily truck trips and up to 8 daily construction worker trips. These activities would generate approximately two truck trips per hour.
- Site preparation (clearing and grubbing) would occur for approximately 3 months with the most intense work occurring in a 15-working day period (i.e., 3 weeks). This would involve up to ten construction worker trips per day and the use of standard construction equipment such as one tractor, one loader, and backhoes. A total of approximately 400 heavy truck trips (200 inbound trips and 200 outbound truck trips) would occur during this phase, which corresponds to (roughly) 7 daily truck trips.
- Grading activities would occur for approximately 3 months and would involve approximately 35,000 cubic yards of soil movement over approximately 7 acres of the site. No import/export of soil is expected as grading is expected to be balanced on site. Grading activities would generate approximately 24 construction daily worker trips.
- The installation of the underground utilities is anticipated to take approximately four months and would involve up to eight daily truck trips and eight daily construction worker trips. This translates to no more than one truck in any given hour.
- Building construction would occur for approximately 26 months. This would involve up to 60 daily construction worker trips and 20 trucks trips per day. If these trips occur during an eight-hour period, there would be two to three truck trips per hour during this phase (i.e., includes both heavy trucks and vendor trucks). This can be considered the peak overall phase of construction activity.

- The paving and landscaping activities at the site are anticipated to occur during the last seven months of the overall construction schedule. This will involve up to ten daily construction worker trips and ten daily truck trips for various uses (i.e., roller, paving equipment, and asphalt/concrete). This represents one to two trucks per hour.

Activities related building construction would generate the highest overall number of peak hour vehicle trips (i.e., combination of construction worker and truck trips during either the weekday AM or PM commute peak hours) during its overlap with the paving and landscaping phase. Thus, the greatest potential for impact on the adjacent street system is expected to occur during this overlap of construction activities. During this overlap, a peak of 78 daily construction worker trips would be anticipated. The majority of the construction workers are expected to arrive at the Project site during off-peak hours (i.e., arrive prior to 7:00 AM) thereby avoiding the weekday AM commute peak period. Also, construction workers would remain on site throughout the day. While some of the outbound worker trips could be expected to occur outside the PM commuter peak hour, in order to provide a conservative analysis all outbound construction worker trips have been assumed to overlap with the PM commuter peak hour (i.e., one hour between 4:00 and 6:00 PM). Therefore, for purposes of this analysis, it is assumed that all 39 outbound construction worker vehicle trips occur during the PM commuter peak hour.

It should be noted that the design-build contractor may request an expedited schedule to work on Saturdays and/or to increase the intensity of the daily construction operations through the use of more equipment/workers on-site than anticipated in the Project's proposed schedule (see Section 3.0, Project Description). If construction activities would occur on Saturdays, the duration for each phase and the overall construction schedule would be shortened. However, it is assumed that the peak construction traffic above would remain the same for a conservative analysis. Also, spot traffic counts at two locations near the site on Saturdays showed that weekend volumes are lower than weekday volumes. Thus, detailed analysis of construction traffic impacts on weekends is not necessary.

In general, it is anticipated that construction worker-related traffic would be largely freeway oriented. Construction workers would likely arrive and depart via nearby on- and off-ramps at the SR-14 Freeway. The most commonly used freeway ramps would be those nearest the Project site, including the SR-14 ramps at West Avenue I and West Avenue J.

Heavy construction equipment would be stored within the perimeter fence area on site during demolition and grading activities and would not travel to and from the Project site on a daily basis. However, truck trips would be generated so as to remove materials from the site and to import building materials to the site. Temporary lane and sidewalk closures are not expected to be required along the adjacent public streets to accommodate truck or equipment staging. An average of two trucks per hour would occur on the peak day. With a PCE factor of 2.5 to account for the heavy vehicle type and slower speeds when fully loaded, the 4 truck trips per hour (i.e., 2 inbound and 2 outbound truck trips per hour) equates to approximately 10 PCE vehicle trips (5 inbound trips and 5 outbound trips) would occur during each weekday AM peak hour and PM peak hour. Construction trucks are expected to occur along designated truck routes, as required by the City of Lancaster (RR TRA-3).

Approximately 10 new weekday AM peak hour PCE vehicle trips (5 inbound and 5 outbound) and 49 new weekday PM peak hour PCE vehicle trips (5 inbound and 44 outbound) would occur during Project construction. Project operations would generate 160 new weekday AM peak hour vehicle trips (86 inbound and 74 outbound) and 80 new weekday PM peak hour vehicle trips (8 inbound and 72 outbound) (see Table 4.13-4 below). If the intensity of construction activity is increased (i.e., doubled), higher weekday PM peak hour trip generation could occur (e.g., 10 inbound vehicle trips and 88 outbound trips). This increase in construction traffic is not anticipated

to exceed the significance thresholds established by the City of Lancaster, as the increases in the v/c ratios are less than 0.02 and the Levels of Service (LOS) are not at LOS E or F.

The traffic analysis below shows that no significant traffic impacts are expected with long-term operation of the proposed Project, which would generate 160 new weekday AM peak hour trips and 80 new weekday PM peak hour trips and 426 new weekend midday peak hour trips. Since the forecasted traffic generation during peak construction activities would be less than the trip generation during Project operations, the traffic impacts associated with construction activities are also determined to be less than significant.

Temporary lane and sidewalk closures are not expected to be required along the adjacent public streets to accommodate truck or equipment staging. If necessary, flagpersons would be used to control traffic movement during the ingress or egress of trucks and heavy equipment from the construction site. Installation of signs and use of flagpersons, detours, and other traffic control devices during construction shall be conducted in accordance with the MUTCD (RR TRA-1) and Greenbook/Graybook (RR TRA-2). The MUTCD includes standards for signs, markings, and traffic-control devices needed to promote pedestrian and vehicle safety and traffic efficiency. The standards include temporary traffic controls during construction; traffic controls for school areas; and traffic controls for highway-rail/light rail transit grade crossings. Construction practices outlined in the Greenbook include the following:

- Maintaining existing access for land uses near the Project site.
- Limiting potential lane closures to off-peak travel periods.
- Scheduling receipt of construction materials during non-peak travel periods to the extent possible.
- Coordinating deliveries to reduce the potential of trucks waiting to unload for extended periods of time.
- Prohibiting parking by construction workers on adjacent streets and directing construction workers to available (on-site) parking.
- Maintaining Americans with Disabilities Act (ADA) and path of travel access to the existing bus stops (located along 60th Street West south of the site).

In compliance with RR TRA-3, the traffic control signs and other traffic control devices, temporary lane and sidewalk closures, detours, designated truck haul routes, designated parking and staging areas, and/or construction traffic measures to minimize potential conflicts between construction activity and through traffic would be shown in a Construction Traffic Management Plan that is submitted to the City and the County.

Construction activities would be short-term and would not permanently affect the local circulation system and operational levels of service. Impacts would be less than significant with compliance with the RRs.

Long-Term Operational Impacts

Project implementation would generate new vehicle trips from employee and volunteer commutes, service/delivery vehicles, inmate transport buses, and lawyer and visitor trips. These new vehicle trips would utilize local roadways and intersections in the Project vicinity, as well as SR-14/SR-138 (Antelope Valley Freeway), I-5 (Golden State Freeway), and other freeways in the region.

Trip Generation

Daily and AM and PM peak hour trip generation by the Project is provided in Table 4.13-4. Daily trip generation is estimated at 160 vehicle trips during the AM peak hour; 80 vehicle trips during the PM peak hour; and 1,038 vehicle trips during a weekday 24-hour period. The Project is also expected to generate 426 new vehicle trips (192 inbound trips and 234 outbound trips) during the weekend midday peak hour, which includes all trip types (i.e., staff and employees, service, and inmate visitation trips). Over a 24-hour (daily) weekend period, the Project is forecasted to generate approximately 1,486 daily trip ends (743 inbound trips and 743 outbound trips).

**TABLE 4.13-4
PROJECT TRIP GENERATION**

Land Use	Size	Daily Trips	AM Peak Hour			PM Peak Hour		
			In	Out	Total	In	Out	Total
Prison	1,604 beds	1,038	86	74	160	8	72	80
Source: LLG 2015								

The weekday vehicle trips projected to enter and exit the site were distributed and assigned to the adjacent street system based on the following considerations:

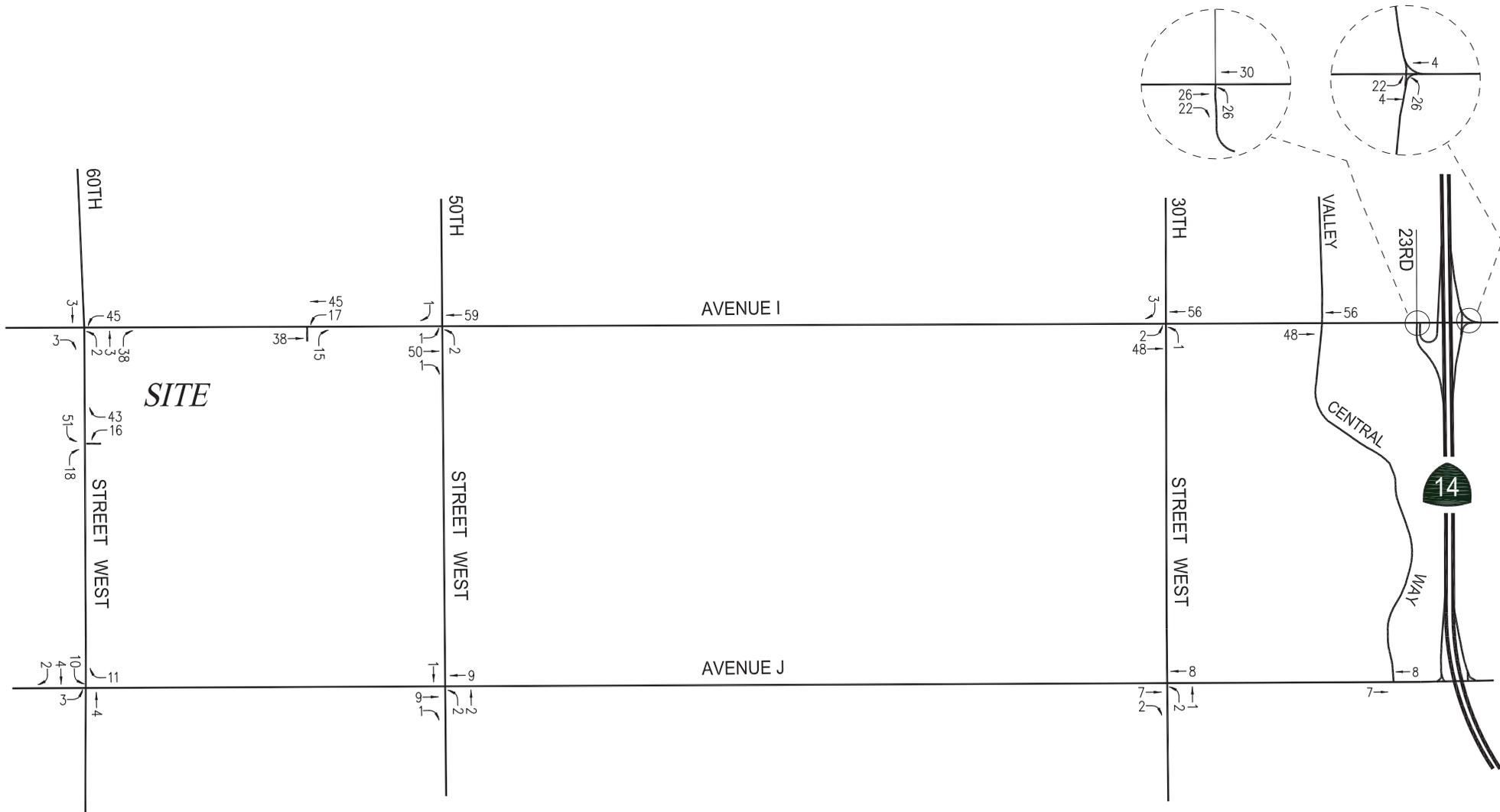
- The site's proximity to major traffic corridors (e.g., 60th Street West, West Avenue I, West Avenue J).
- Expected localized traffic flow patterns based on adjacent roadway channelization and presence of traffic signals.
- Existing intersection traffic volumes.
- Ingress/egress availability at the Project site assuming site access and circulation.
- Location of proposed parking areas.
- Nearby population and employment centers.
- Input from City of Lancaster staff.

This trip distribution is shown in Exhibit 4.13-4. Project-related AM and PM peak hour traffic volumes are shown in Exhibits 4.13-4 and 4.13-5, respectively.

As stated in RR GHG-4, the Project will include an Employee Commute Reduction Plan (ECRP), commonly known as the Rideshare Plan, in accordance with Los Angeles County Code Chapter 5.9-Vehicle Trip Reduction. Compliance with this RR is anticipated to result in an average vehicle ridership of 1.135 staff members per vehicle to account for some limited transit use, carpooling, and use of alternative modes of transportation. Implementation of PDF GHG-3 and PDF GHG-4 could also result in a reduction in vehicle trips generated by the Project, but this cannot be readily quantified and thus, is not considered in the analysis below.

Existing Plus Project Traffic Conditions

Projected increases in V/C ratios at the ten study intersections are provided in Table 4.13-5 and include the addition of Project-related traffic to the existing AM and PM peak hour traffic volumes. As shown, all intersections are expected to remain operating at LOS A or B during the AM and PM peak hours. No exceedance of Lancaster's LOS standard would occur. Thus, the increases in traffic volumes at the study intersections would not be considered a significant impact.



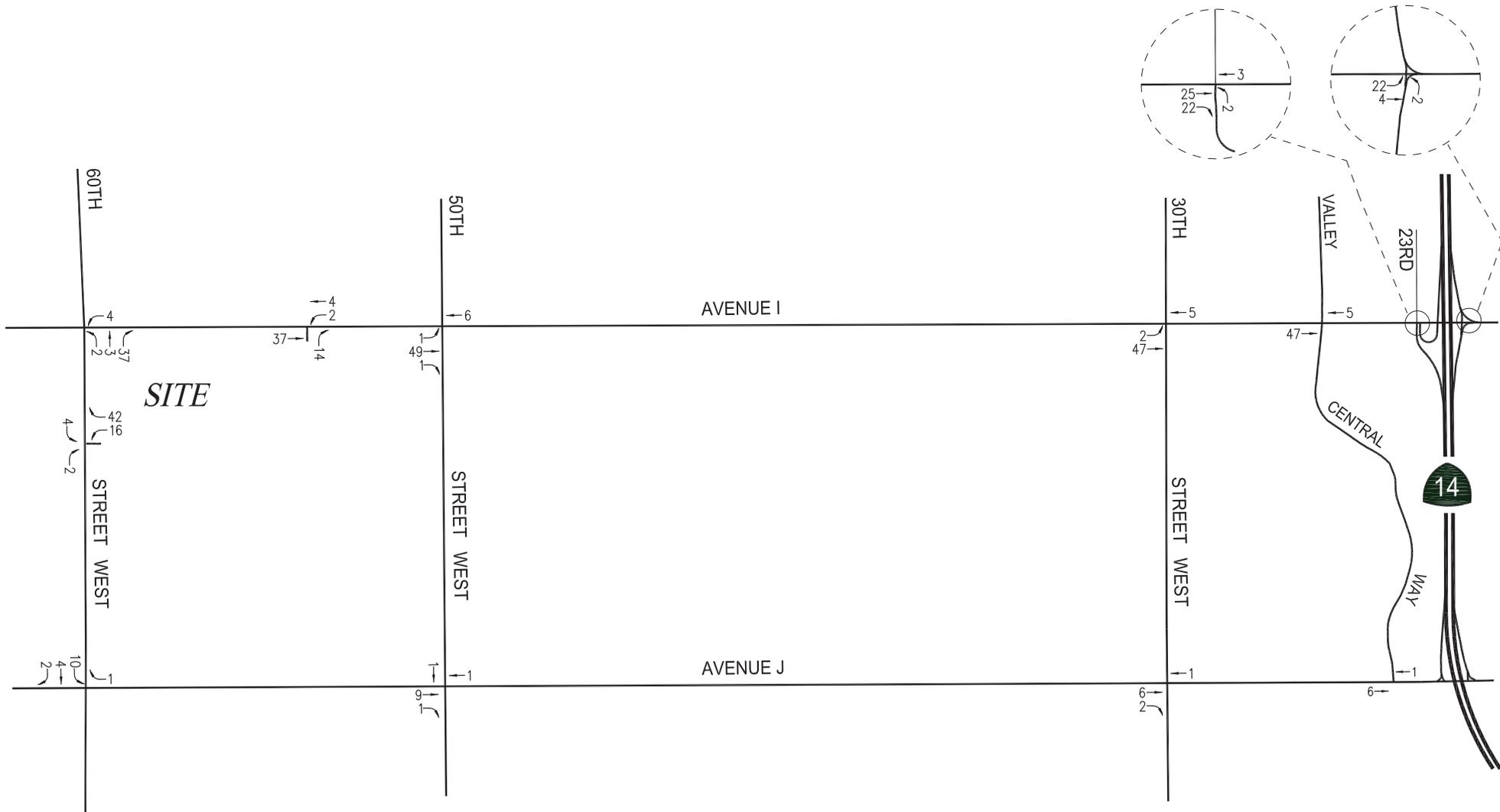
Source: LLG 2015

Project Related AM Peak Hour Traffic Volumes

Exhibit 4.13-4

Mira Loma Women's Detention Center





Source: LLG 2015

Project Related PM Peak Hour Traffic Volumes

Exhibit 4.13-5

Mira Loma Women's Detention Center



**TABLE 4.13-5
EXISTING PLUS PROJECT
INTERSECTION LEVEL OF SERVICE**

No.	Intersection	Peak Hour	Existing Condition		Existing Plus Project		Change	
			V/C	LOS	V/C	LOS	V/C	Significant Impact?
1	60 th St West/West Ave I	AM	0.372	A	0.404	A	0.032	No
		PM	0.306	A	0.332	A	0.026	No
2	60 th St West/West Ave J	AM	0.442	A	0.448	A	0.006	No
		PM	0.382	A	0.386	A	0.004	No
3	50 th St West/West Ave I	AM	0.320	A	0.352	A	0.032	No
		PM	0.358	A	0.389	A	0.031	No
4	50 th St West/West Ave J	AM	0.523	A	0.531	A	0.008	No
		PM	0.399	A	0.406	A	0.007	No
5	30 th St West/West Ave I	AM	0.292	A	0.302	A	0.010	No
		PM	0.232	A	0.242	A	0.010	No
6	30 th St West/West Ave J	AM	0.608	B	0.611	B	0.003	No
		PM	0.456	A	0.457	A	0.001	No
7	Valley Central Way/West Ave I	AM	0.239	A	0.249	A	0.010	No
		PM	0.288	A	0.298	A	0.010	No
8	Valley Central Way/West Ave J	AM	0.359	A	0.361	A	0.002	No
		PM	0.568	A	0.568	A	0.000	No
9	23 rd St West/SR-14 SB ramps/West Ave I	AM	0.304	A	0.318	A	0.014	No
		PM	0.398	A	0.412	A	0.014	No
10	SR-14 NB ramps/West Ave I	AM	0.386	A	0.398	A	0.008	No
		PM	0.446	A	0.454	A	0.008	No

V/C: volume-to-capacity ratio; LOS: level of service; SR: State Route; SB: southbound; NB: northbound
Source: LLG 2015

Year 2019 Traffic Conditions

A number of other development projects have been proposed near the site that may affect traffic volumes and intersection operations at that time. A total of 81 cumulative projects were identified based on information on file at the City of Lancaster, as listed in Table 2-1 and shown in Exhibit 2-5 in Section 2.0, Environmental Setting. These projects include a total of 6,490 single-family detached homes; 355 condominium units; a church addition (33,532 square feet); 2 discount superstores (with a total of 769,328 square feet); 172,416 square feet of retail and restaurant uses; 181 rooms in 2 hotels; and a State Prison health care clinic. These projects are projected to generate a total of 112,477 vehicle trips per day, with 6,786 trips during the AM peak hour and 10,881 trips during the PM peak hour.

In addition, the existing traffic volumes were increased at an annual rate of 1.0 percent to the year 2019 (i.e., the anticipated year of Project buildout). The ambient growth factor was based on general traffic growth factors and the current expectations of economic activity in the area, as determined in consultation with the City of Lancaster. The use of both trip generation by the known cumulative projects plus an ambient growth traffic factor results in a conservative estimate of future traffic volumes at the study intersections.

Table 4.13-6 shows the V/C ratio and LOS at the study intersections with the addition of a 1.0 percent ambient growth through Year 2019 and the traffic volumes from the cumulative projects. As shown, all study intersections are expected to operate at LOS D or better during one

or both peak hours with the addition of growth in ambient traffic volumes and cumulative project traffic.

**TABLE 4.13-6
YEAR 2019 FUTURE PRE-PROJECT
INTERSECTION LEVEL OF SERVICE**

No.	Intersection	Peak Hour	Year 2019 Future Pre-Project with Ambient Growth		Year 2019 Future Pre-Project with Ambient Growth and Cumulative Projects	
			V/C	LOS	V/C	LOS
1	60 th St West/West Ave I	AM	0.383	A	0.458	A
		PM	0.315	A	0.454	A
2	60 th St West/West Ave J	AM	0.456	A	0.698	B
		PM	0.393	A	0.795	C
3	50 th St West/West Ave I	AM	0.329	A	0.415	A
		PM	0.368	A	0.464	A
4	50 th St West/West Ave J	AM	0.539	A	0.883	D
		PM	0.411	A	0.776	C
5	30 th St West/West Ave I	AM	0.300	A	0.452	A
		PM	0.238	A	0.375	A
6	30 th St West/West Ave J	AM	0.628	B	0.843	D
		PM	0.471	A	0.881	D
7	Valley Central Way/West Ave I	AM	0.245	A	0.352	A
		PM	0.295	A	0.380	A
8	Valley Central Way/West Ave J	AM	0.370	A	0.476	A
		PM	0.586	A	0.793	C
9	23 rd St West/SR-14 SB ramps/West Ave I	AM	0.312	A	0.402	A
		PM	0.410	A	0.542	A
10	SR-14 NB ramps/West Ave I	AM	0.397	A	0.497	A
		PM	0.460	A	0.548	A

V/C: volume-to-capacity ratio; LOS: level of service; SR: State Route; SB: southbound; NB: northbound
Source: LLG 2015

With the addition of Project-generated traffic, V/C ratios are expected to further increase, but intersections would still operate at LOS D or better (see Table 4.13-7 below). Changes in V/C ratios would be less than significant and no mitigation is required.

**TABLE 4.13-7
YEAR 2019 FUTURE PLUS PROJECT
INTERSECTION LEVEL OF SERVICE**

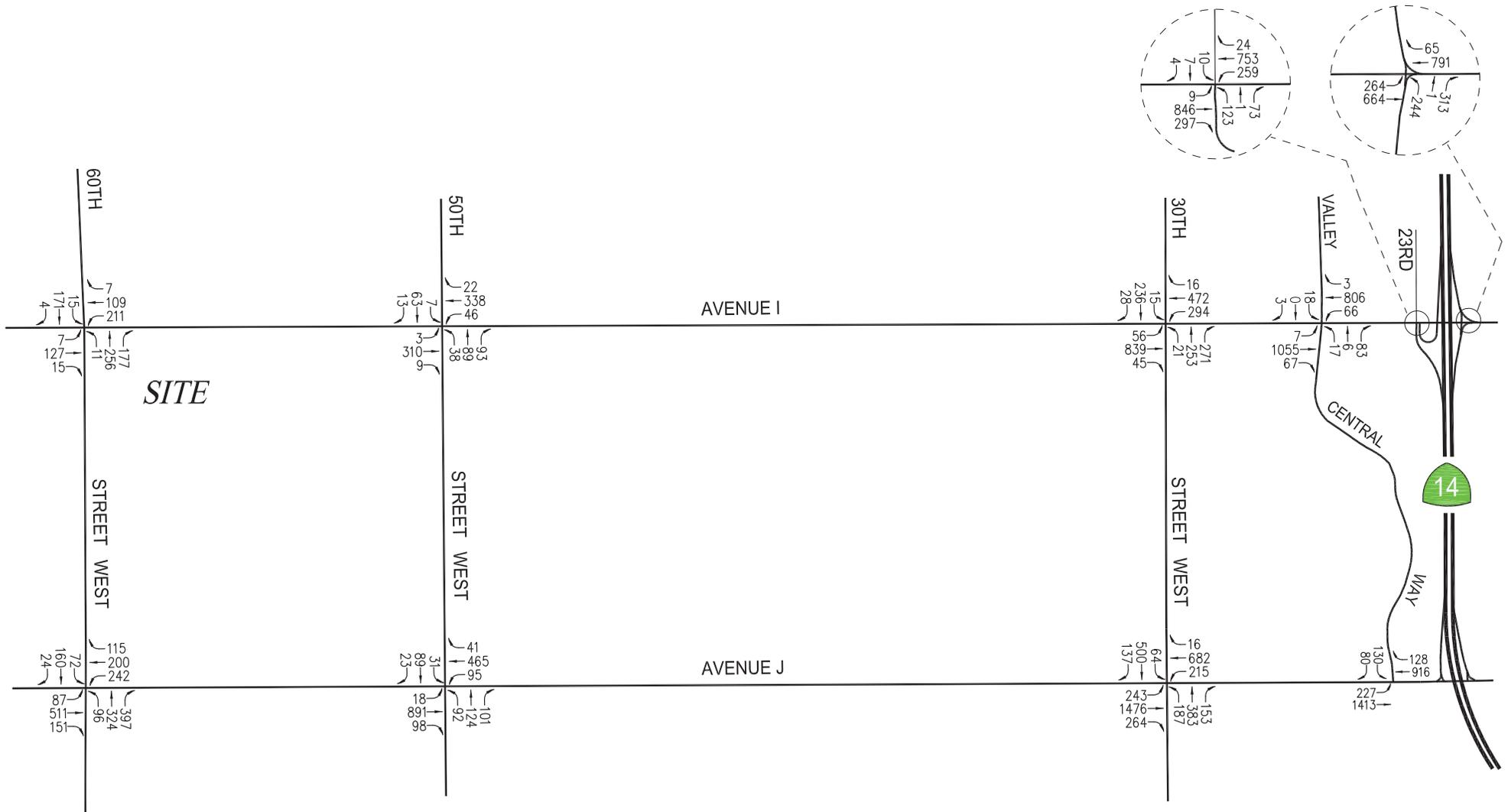
No.	Intersection	Peak Hour	Year 2019 Future Pre-Project Condition		Year 2019 Future Plus Project		Change	
			V/C	LOS	V/C	LOS	V/C	Significant Impact?
1	60 th St West/West Ave I	AM	0.458	A	0.490	A	0.032	No
		PM	0.454	A	0.458	A	0.004	No
2	60 th St West/West Ave J	AM	0.698	B	0.704	C	0.006	No
		PM	0.795	C	0.799	C	0.004	No
3	50 th St West/West Ave I	AM	0.415	A	0.447	A	0.032	No
		PM	0.464	A	0.495	A	0.031	No
4	50 th St West/West Ave J	AM	0.883	D	0.891	D	0.008	No
		PM	0.776	C	0.777	C	0.001	No
5	30 th St West/West Ave I	AM	0.452	A	0.462	A	0.010	No
		PM	0.375	A	0.385	A	0.010	No
6	30 th St West/West Ave J	AM	0.843	D	0.846	D	0.003	No
		PM	0.881	D	0.881	D	0.000	No
7	Valley Central Way/West Ave I	AM	0.352	A	0.362	A	0.010	No
		PM	0.380	A	0.390	A	0.010	No
8	Valley Central Way/West Ave J	AM	0.476	A	0.478	A	0.002	No
		PM	0.793	C	0.793	C	0.000	No
9	23 rd St West/SR-14 SB ramps/West Ave I	AM	0.402	A	0.425	A	0.023	No
		PM	0.542	A	0.556	A	0.014	No
10	SR-14 NB ramps/West Ave I	AM	0.497	A	0.487	A	0.008	No
		PM	0.548	A	0.556	A	0.008	No

V/C: volume-to-capacity ratio; LOS: level of service; SR: State Route; SB: southbound; NB: northbound
Source: LLG 2015

The Year 2019 Future with Project traffic volumes at the study intersections during the weekday AM and PM peak hours are shown in Exhibits 4.13-6 and 4.13-7, respectively.

Ramp Queuing

Both the SR-14 Freeway Southbound Off-Ramp at the 23rd Street/West Avenue I intersection and the SR-14 Northbound Off-Ramp at West Avenue I intersection are controlled by traffic signals and are operating at an acceptable LOS. Table 4.13-8 shows the maximum back of vehicle queues with 95th percentile traffic volumes. As shown, adequate 85th percentile storage lengths are provided to accommodate the forecasted 95th percentile queues under the Year 2019 Future Plus Project Conditions. Therefore, vehicle queuing back onto the SR-14 mainline travel lanes is not expected with the Project. Impacts on Caltrans facilities would be less than significant and no mitigation is required.



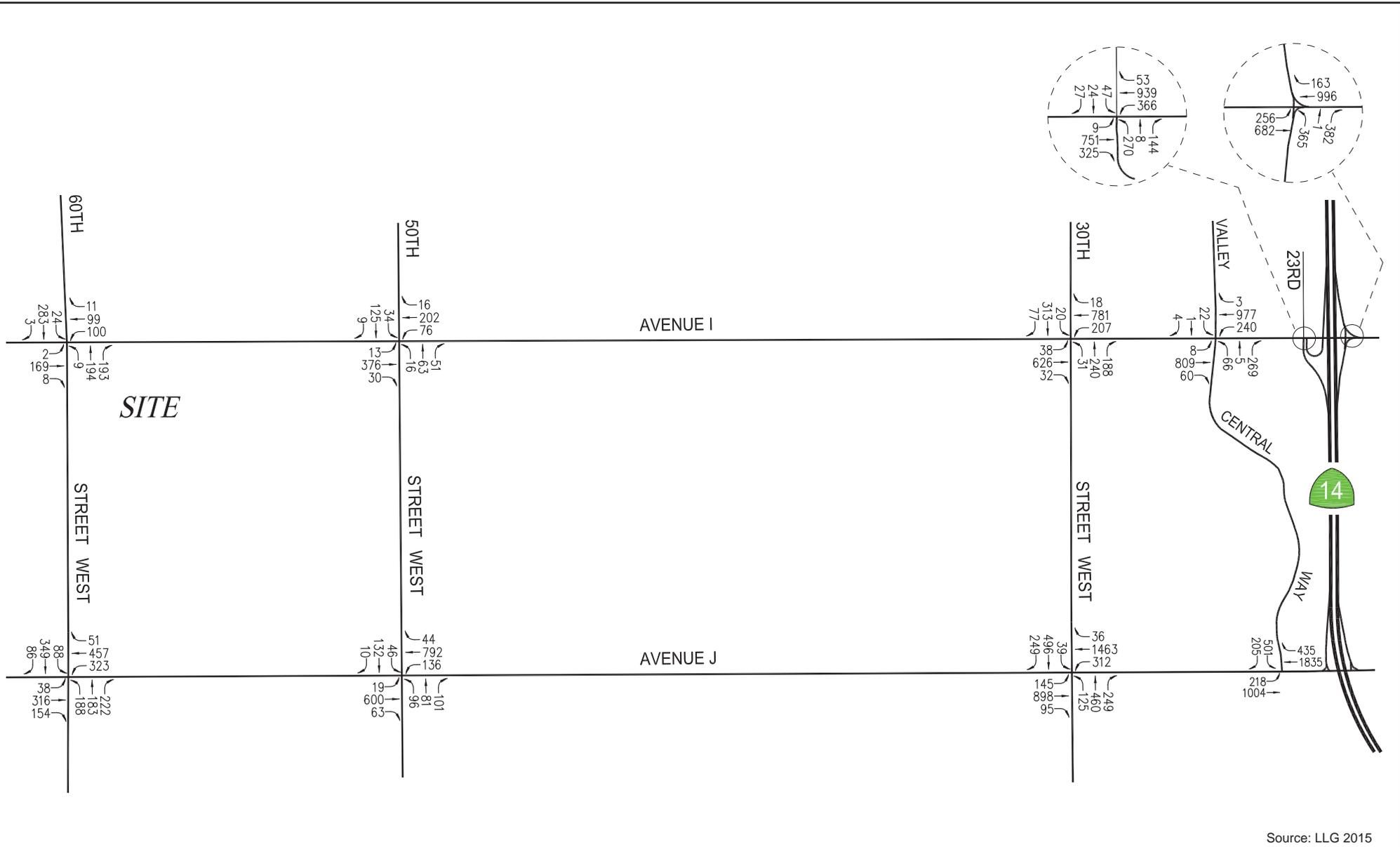
Source: LLG 2015

Year 2019 With Project AM Peak Hour Traffic Volumes

Exhibit 4.13-6

Mira Loma Women's Detention Center





**TABLE 4.13-8
FREEWAY OFF-RAMP VEHICLE QUEUING^a**

Ramp Location	Peak Hour	Available Storage ^b (feet)	Year 2019 Future with Project Conditions		
			95 th Percentile Queue ^c (feet)	Adequate Storage (Yes/No)	Delay/LOS ^d
No. 9 SR-14 SB Off-Ramp to West Ave I	AM	1,750	243	Yes	18.9 sec/B
	PM	1,750	485	Yes	27.1 sec/C
No. 10 SR-14 NB Off-Ramp to West Ave I	AM	1,380	368	Yes	14.8 sec/B
	PM	1,380	485	Yes	17.0 sec/B

LOS: Level of Service; SB: southbound; sec: seconds; NB: northbound

^a The intersection queuing analysis is based on the Highway Capacity Manual (HCM) methods.

^b Available storage is based on aerial measurements from Caltrans Earth for the 85th percentile storage capacity.

^c The 95th percentile queue is the maximum back of queue with 95th percentile traffic volumes. An average vehicle length of 25 feet is utilized.

^d Overall intersection control delay in seconds per vehicle and the corresponding levels of service.

Source: LLG 2015

Vehicle Miles Traveled

Based on a review of the locations of the residences of existing female inmates, it is anticipated that there will be an increase in the total overall vehicle miles traveled when comparing the CRDF location in Lynwood to the Mira Loma Women's Detention Center in Lancaster. The increase in vehicle miles traveled is based on following:

- The existing geographic distribution of inmate origins remains fairly comparable to what occurs today. Based on an extensive review of existing inmate zip code origin data, it was determined that the average visitation trip length is approximately 25 miles per 1-way trip to the CRDF facility in Lynwood and would be expected to increase to 74 miles per 1-way trip to the Project site. Thus, inmate visitation trip lengths to the Project site will increase.
- Based on a detailed review of all Los Angeles Sheriff's Department (LASD) zip code data, a total of 2,602 employees (or 14.5 percent of all 17,923 employees) currently reside in the Santa Clarita and Antelope Valley areas. The MLWDC will have a total employment of 523 positions, which is just under 3 percent of all employment. Employee origins are expected to be a combination of existing CRDF employees to be relocated and other LASD employees living closer to the Project site. Under the LASD's current policy of assigning staff based on seniority, the staffing of the MLWDC and LASD's hiring protocol would allow a first right of refusal to those employees who were assigned to the MLDC under the ICE contract, followed by employees (by seniority) who request to be reassigned to the MLWDC, followed by newly hired employees as the last group. As such, it can be assumed that most, if not all, of the 523 MLWDC employees can come from the pool of 2,602 LASD employees already living in the area and the Project could likely result in a lower VMT by providing an employment opportunity nearer to their homes. In order to be conservative, it is assumed that no increase (rather than a potential decrease) in employee VMT would occur as a result of the Project.
- Miscellaneous trips due to service/delivery trip generation, medical and court personnel, and other trips has conservatively been assumed to involve an average trip length increase of approximately 50 miles per 1-way trip. Based on coordination with the County, the majority of these trips will be from the central Los Angeles area.

In order to provide an approximation of the increases in vehicle miles traveled due to the proposed Project, the above-described average trip lengths were utilized and applied to the corresponding

forecast of trip generation by trip type. The calculation of VMT increases during the weekend day includes an increase of roughly 49 miles per 1-way visitor trip and an expected 250 inmate visitation appointments per weekend day/holiday for a total increase of 24,500 VMT per weekend/holiday day (i.e., 250 appointments per weekend day/holiday x 49 miles per 1-way trip x 2 trips per day).

It is possible that increased VMT could become a discouraging factor for some visitors when considering increased distance, time and travel costs between the CRDF and the MLWDC. Thus, the substantial increase in opportunities for qualifying inmates to participate in video visitation at the MLWDC would provide more options for visitation, and could result in more frequent visitation without increasing VMT. As stated in PDF GHG-1, a combined minimum of 34 video-visiting stations will be provided in Building 3 and within each of the barracks a MLWDC, along with video interview rooms in transitional housing buildings. This compares to 2 video-visiting stations currently located within CRDF.

Employee travel is likely to have a reduction in VMT, however, no increase has been assumed. The miscellaneous trips could result in an increase of 1,200 VMT per weekend day (12 vehicles per day x 2 trips per day x 50 miles average trip length = 1,200 VMT). Thus, the increase in VMT that could potentially occur during a weekend/holiday day totals 25,700 VMT with the proposed Project (24,500 VMT [inmate visitation] + 1,200 VMT [miscellaneous trips] = 25,700 VMT). However, no specific significance thresholds related to VMT increases have been adopted by the City of Lancaster or the County of Los Angeles and therefore, this discussion is provided for informational purposes.

Regional Transportation Plan/Sustainable Communities Strategy Consistency

As discussed in Section 4.9, Land Use and Planning, the proposed Project is consistent with the goals of the RTP/SCS. No FTIP projects, which implement the RTP/SCS, are specifically located adjacent to the site, and FTIP projects in the City of Lancaster and in the Antelope Valley would not be affected by the proposed Project. No impacts on the RTP/SCS are expected, and no mitigation is required.

Threshold 4.13b: Would the project conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?

Short-Term and Long-Term Impacts

Construction activities would be short-term and would not permanently affect the local circulation system. Since intersections near the site currently operate at LOS A, the addition of construction-related traffic would not lead to LOS E or F operations. Impacts would be less than significant.

The CMP is a State-mandated program that was enacted in 1990 to address the impact of local growth on the regional transportation system. The 2010 CMP for Los Angeles County states that a "significant impact occurs when the proposed Project increases traffic demand on a CMP facility by 2 percent of capacity ($V/C \geq 0.02$), causing LOS F ($V/C > 1.00$); if the facility is already LOS F, a significant impact occurs when the proposed Project increases traffic demand on a CMP facility by 2 percent of capacity ($V/C \geq 0.02$)" (Metro 2010).

A review of Project impacts to CMP freeway and intersection monitoring stations was conducted to determine if a Traffic Impact Assessment (TIA) per CMP requirements is required for the Project.

SR-14 is on the CMP highway system and the nearest freeway monitoring location is located at SR-14, south of Junction Route 48. The Project will not add 150 or more trips (in either direction), during the weekday AM or PM peak hours to this CMP freeway monitoring location. A total of 160 vehicle trips would be generated by the Project during the AM peak hour and 80 trips during the PM peak hour. Of these, only 26 trips during the AM peak hour and 22 trips during the PM peak hour would be using SR-14, south of Junction Route 48. The nearest CMP intersection monitoring location is at West Avenue D and 60th Street West. The Project will not add 50 or more trips (in either direction) during the weekday AM or PM peak hours to this CMP intersection monitoring location. No more than six vehicle trips during the AM peak hour and no more than three trips during the PM peak hour would use this CMP intersection. Therefore, no TIA is required.

No conflict with the CMP will occur with the Project. Also, Project impacts on the CMP highway system would be less than significant, and no mitigation is required.

Threshold 4.13c: Would the project result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?

Short-Term and Long-Term Impacts

The Project would not be directly served by air transportation and would not affect air traffic volumes at the William J. Fox Airport, the nearest airport to the Project site. Also, due to the distance of the site to this airport (approximately 2.3 miles to the north), no impacts to aircraft operations at the William J. Fox Airport would occur with the proposed Project.

As discussed in Section 4.8, Hazards and Hazardous Materials, the on-site helipad is used every day by Los Angeles County Sheriff's Department helicopters for crew relief, and the Project would not change the frequency of landings and take-offs from this helipad. Also, the Project would not create hazards or adversely affect helipad operations. No impacts on air traffic patterns or operations are expected; no mitigation is required.

Threshold 4.13d: Would the project substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

Short-Term and Long-Term Impacts

No changes to the alignment of the off-site roads and existing driveways serving the site are proposed by the Project. No new roads, sharp curves, or dangerous intersections would be created near the site. Also, no roads are proposed to be vacated.

The Project would provide two access point driveways: one existing driveway on 60th Street West and one existing driveway on West Avenue I. No changes to the existing driveway operation or traffic controls are proposed as part of the Project. An exclusive southbound left-turn pocket (or two-way left-turn lane) at the 60th Street West access point (which allows ingress and egress traffic movements to/from the site) is not recommended as part of the Project due to the relatively low opposing northbound through traffic volumes and the presence of acceptable gaps in both the northbound and southbound through traffic volumes.

While 60th Street West has been widened south of the Project site (i.e., adjacent to the CSP-LAC), the City of Lancaster is anticipated to continually monitor overall corridor traffic volumes as buildout occurs so as to determine the appropriate timing for the widening of 60th Street West to meet General Plan (Year 2030) requirements and standards.

The secondary access driveway for the Project would be widened as part of the Project to provide full ingress and egress turning movements (i.e., right-turn and left-turn inbound and outbound access), but will be limited for use by inmate transport vehicles, employee vehicle and service delivery vehicles only (PDF TRA-1). A new entry guard house would be constructed near the West Avenue I driveway. Connectivity throughout the site will be provided via internal drive aisles between the various parking/service-related areas (e.g., parking lots, building entrances, and loading areas) of the site.

The three other driveways located along 60th Street West and the one other driveway on West Avenue I are not planned for use or shared access by the proposed Project. The surface parking areas would provide an adequate amount of parking spaces based on County requirements and would accommodate the demands of anticipated staff and visitor parking needs. Both the Los Angeles County Code and Lancaster Zoning Code do not specify parking requirements for prison type uses but state that parking for a use that is not specified shall be provided in an amount which the director finds adequate to prevent traffic congestion and excessive on-street parking and based upon the requirements for the most comparable use. The Project would comply with this standard.

Off-Site Impacts

During the construction of the water line extension and connection to the water main in West Avenue I, and potential associated driveway improvements, traffic flows along 60th Street West and West Avenue I may be affected as travel lanes could be temporarily blocked to traffic. Relevant standards in the Greenbook/Graybook and MUTCD would have to be followed for all construction work on public rights-of-way (RR TRA-1 and RR TRA-2). The standards call for the provision of warning signs/lights, temporary striping, driveway access, street closures, detours and barricades, flag persons, and other measures to maintain public convenience and safety for motorists, cyclists, pedestrians, and construction workers.

In addition, compliance with the City of Lancaster Traffic Code would also be required on the City's public rights-of-way (RR TRA-3). Compliance with these RRs would minimize traffic obstruction during the construction phase and would prevent hazards to all persons near the construction zones. Impacts due to temporary construction activities on public roadways would be less than significant; no mitigation is required. Impacts related to traffic hazards would be less than significant and no mitigation is required.

Threshold 4.13e: Would the project result in inadequate emergency access?

Short-Term and Long-Term Impacts

The Project site is served by a developed roadway network (including West Avenue I and 60th Street West) that provides emergency access and evacuation routes to the site and existing developments on and near the site.

No changes to roadways are proposed by the Project, and the Project would be developed in accordance with current regulations, including emergency access for fire protection personnel. Compliance with the California Fire Code (see RR PS-1 from Section 4.12, Public Services and Recreation) would ensure the availability of adequate emergency access to the structures

proposed on site. Compliance with RR PS-2 (from Section 4.12) regarding the establishment of emergency procedures would also facilitate emergency access and evacuation. No significant adverse impacts to emergency access would occur.

Off-Site Impacts

Major streets and freeways in the City would serve as evacuation routes provided they are functional. West Avenue I, West Avenue J, and other major arterials have been identified as local evacuation routes, and SR-14, Sierra Highway, and SR-138 have been identified as regional evacuation routes (Lancaster 2009b).

Construction of the water line extension and connection to the water main in West Avenue I would occur on public roads serving as emergency access to abutting developments. Construction on or near public rights-of-way may temporarily block traffic and access near the construction zone. Compliance with RR TRA-1 and RR TRA-2 would maintain emergency access to individual parcels at all times, and emergency personnel would be notified of construction zones to facilitate emergency response to and through the construction area. Upon completion, the driveways would be at-grade and the water line extensions and connection would be underground and would have no impacts on emergency access. Impacts on traffic flows for emergency response and access or for evacuation would be temporary and less than significant; no mitigation is required.

Threshold 4.13f: Would the project conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?

Short-Term Construction Impacts

Construction equipment, trucks and construction crews are unlikely to utilize alternative transportation due to the size of loads and the need to bring tools and equipment to the site. No impact on alternative transportation would occur in the short-term.

Long-Term Operational Impacts

During long-term operations, an increase in the use of available alternative transportation may occur. While inmates will be transported to and from the Project site and the IRC by County vehicles, employees and visitors of the Project may generate a demand for public transportation services. Thus, the Project would increase the use of alternative transportation systems near the site.

Bus Transit

While inmates would not be allowed to use public bus transit services, inmate visitors and employees would increase the use of bus transit services. Pursuant to the transit demand factors in the CMP (i.e., person trips equal 1.4 times vehicle trips, and transit trips equal 3.5 percent of the total person trips) transit trip generation under the proposed Project is estimated at 8 transit trips during the weekday AM peak hour, 4 transit trips during the weekday PM peak hour, and a total of approximately 51 daily transit trips during the weekday. The calculations are as follows:

- AM Peak Hour = $160 \times 1.4 \times 0.035 = 8$ Transit Trips
- PM Peak Hour = $80 \times 1.4 \times 0.035 = 4$ Transit Trips
- Daily Trips = $1,038 \times 1.4 \times 0.035 = 51$ Transit Trips

As discussed above, AVTA Route 7 runs along the Project frontage on 60th Street West, with a stop at the former HDHS MACC facility immediately south of the site. With 3 buses running during the AM peak hour and 2 buses during the PM peak hour on weekdays, and 30 bus runs per day, an average increase of 2 to 3 riders per bus would occur with the Project. AVTA Route 7 also operates during the typical weekend (Saturday) period.

Given the low number of Project-generated transit trips, AVTA Route 7 can readily accommodate increases in the number of transit riders that would be generated by the Project. Visitors and employees coming from Downtown Los Angeles and other areas in the region and those along the Metrolink line to Lancaster may also use of Metrolink trains, in combination with AVTA buses, to reach the Project site.

It is anticipated that the existing transit services in the area and the region will adequately accommodate the increase of Project-generated transit trips. No new or expanded transit services are needed to serve the Project. Impacts would be less than significant and no mitigation is required.

Bicycle Lanes and Sidewalks

There are no existing or proposed bikeways on 60th Street West and West Avenue I near the site that may be utilized by employees or visitors. However, roadway shoulders and sidewalks in the area may be used by bicyclists and pedestrians coming to or going from the Project site. Since the surrounding area is not heavily populated and the times and number of inmate visitors would be controlled, the increase in bicyclists and pedestrians that may be generated by the Project is not expected to be substantial.

The environmental impacts of the Project on alternative transportation systems would be less than significant; no mitigation is required.

4.13.7 CUMULATIVE IMPACTS

Cumulative transportation impacts are evaluated based on impacts to the roadway transportation network serving the Antelope Valley. The cumulative projects listed in Table 2-1 in Section 2.4 and the proposed Project would add vehicle trips to roads, intersections, and freeways near the site and in the region. At Project initiation, coordination with the City's Planning Department and the County's Department of Regional Planning was by made LLG to obtain the necessary information to compile a list of past, present and probable future projects. In addition, an annual growth in ambient traffic volumes was used in the analysis as based on a review of growth factors contained in the 2010 Congestion Management Program for Los Angeles County and in coordination/direction received from the City of Lancaster Public Works staff.

Short-Term Construction Impacts

While some cumulative projects are proposed near the site, the construction schedules of these projects are not known and there is a potential for them to be constructed at the same time as the proposed Project. While increases in construction traffic in the surrounding area would occur, these impacts would be temporary and would vary depending on the phase of construction at each cumulative project site. Compliance with RR TRA-1, RR TRA-2, and RR TRA-3 would avoid traffic congestion and safety hazards during construction. Impacts would be less than significant.

Long-Term Operational Impacts

The Year 2019 traffic analysis above accounts for increases in vehicle trips due to proposed developments near the site plus an ambient growth in traffic volumes due to other developments in the area. Therefore, the analysis includes the assessment of cumulative traffic impacts from the Project and future growth and development in the surrounding area and the Antelope Valley.

The analysis shows that no significant adverse impacts would occur at the study intersections and freeway ramps. Therefore, no significant and unavoidable cumulative impacts would occur.

Based on regional traffic forecasts, SCAG has identified regional transportation improvements to meet the transportation and circulation needs of the region in its RTP/SCS and FTIP. Additional freeway travel lanes, improved interchanges, widened roadways, expanded transit services, and other projects are planned and would accommodate increases in vehicle trips due to growth and development throughout the Antelope Valley. These projects would improve the regional transportation network and mitigate cumulative impacts on some of the major roadways and freeways in the Antelope Valley.

In addition, individual developments are expected to construct needed improvements to roads within and abutting each project site and/or pay fair share fees for impacts to nearby roadways and intersections. Compliance with City regulations by individual projects would prevent adverse impacts on alternative transportation systems; would avoid the creation of traffic hazards; and would not lead to inadequate emergency access. Cumulative impacts on transportation would be less than significant and no mitigation is required.

4.13.8 MITIGATION MEASURES

With implementation of PDFs and compliance with existing regulations (as discussed above), no significant adverse impacts related to traffic and transportation would occur. Therefore, no mitigation measures are required.

4.13.9 LEVEL OF SIGNIFICANCE AFTER MITIGATION

Direct, indirect and cumulative impacts on traffic and transportation would be less than significant with compliance with existing regulations.

4.13.10 REFERENCES

AirNav, LLC (AirNav). 2015 (April 30, FAA information effective date). KWJF General Wm J Fox Airfield, Lancaster, California USA. Atlanta, GA: AirNav, LLC.
<http://www.airnav.com/airport/KWJF>.

Antelope Valley Transit Authority (AVTA). 2014a. Local Transit Service – Summer 2014. Lancaster, CA: AVTA.

———. 2014b (July 14). Route 7 – Quartz Hill. Lancaster, CA: AVTA.

Federal Highway Administration (FHWA). 2014 (December 15). Approval of the 2015 Federal Statewide Transportation Improvement Program. Sacramento, CA: FHWA.

Lancaster, City of. 2015a (April 17, last updated). Environmental Review: CANCELLATION – Scoping Meeting for the Lancaster Metrolink Station Closure. Lancaster, CA: the City.
<http://www.cityoflancasterca.org/index.aspx?page=110>.

- . 2015b (May, last updated). *Lancaster, California – Code of Ordinances*. Talahassee, FL: Municode Corporation for the City. https://www.municode.com/library/ca/lancaster/codes/code_of_ordinances?nodeId=16042.
- . 2009a (July 14, adopted). *City of Lancaster General Plan 2030*. Lancaster, CA: the City. <http://www.cityoflancasterca.org/Index.aspx?page=427>.
- . 2009b (April). *General Plan 2030 Master Environmental Assessment*. Lancaster, CA: the City. <http://www.cityoflancasterca.org/Modules/ShowDocument.aspx?documentid=11352>.
- Linscott, Law and Greenspan (LLG). 2015 (April). *Traffic Impact Study, Mira Loma Women's Detention Center, City of Lancaster, California*. Pasadena, CA: LLG.
- Los Angeles County Airport Land Use Commission (Los Angeles County ALUC). 2004 (December 1). General William J. Fox Airfield Land Use Compatibility Plan. Los Angeles, CA: Los Angeles County ALUC.
- Los Angeles County Metropolitan Transportation Authority (Metro). 2010. *2010 Congestion Management Plan for Los Angeles County*. Los Angeles, CA: Metro.
- Metrolink. 2015 (April 2, access date). Stations. Los Angeles, CA: Metrolink. <http://www.metrolinktrains.com/stations/>.
- Southern California Association of Governments (SCAG). 2014 (September 11). *2015 Final Federal Transportation Improvement Program*. Los Angeles, CA: SCAG. <http://ftip.scag.ca.gov/Pages/2015/adopted.aspx>.
- . 2012. (April 4, adoption date). *2012–2035 Regional Transportation Plan/Sustainable Communities Strategy*. Los Angeles, CA: SCAG. <http://rtpscsc.scag.ca.gov/Pages/2012-2035-RTP-SCS.aspx>.

4.14 UTILITIES AND SERVICE SYSTEMS

This section of the EIR describes the existing utilities and service systems that serve the Project site and surrounding areas and addresses potential Project impacts on the facilities and services of these utility providers. Information was derived from responses to the Notice of Preparation (Appendix A); consultation with the various utility providers (Appendix G-1); and the websites of these providers. In addition, the following technical reports were prepared for Project:

- Appendix G-2: Water Supply Assessment (Psomas)
- Appendix F-2: Preliminary Site Water Supply and Distribution Analysis Narrative (VCA Engineers)

Impacts on the following utilities are addressed below and the service provider is noted in parentheses:

- Water Infrastructure and Supply (Los Angeles County Waterworks District 40 [LACWWD 40]);
- Wastewater Infrastructure and Treatment (Sanitation Districts of Los Angeles County [LACSD]);
- Solid Waste Collection and Disposal (Waste Management and LACSD);
- Storm Drain Infrastructure (Los Angeles County Department of Public Works [LACDPW] and LACSD);
- Electricity (Southern California Edison [SCE]) and natural gas (Southern California Gas Company [SCG]); and
- Telecommunications (Verizon and Time Warner).

4.14.1 RELEVANT PROGRAMS AND REGULATIONS

State

Water Supply

Urban Water Management Planning Act

The Urban Water Management Planning Act (UWMP Act) (*California Water Code*, Division 6, Part 2.6, Section 10610 et seq.) was enacted in 1983 and applies to municipal water suppliers that serve more than 3,000 customers or supply more than 3,000 acre-feet per year (afy) of water. The UWMP Act requires these suppliers to prepare and update their Urban Water Management Plans (UWMPs) every five years to demonstrate an appropriate level of reliability in supplying anticipated short-term and long-term water demands during normal, dry, and multiple-dry years. The UWMP Act specifies the data necessary to document the existing and projected future water demand over a twenty-year projection, and requires that the projected demands be presented in five-year increments for the twenty-year projection. The Project area is addressed by several water management plans: the Antelope Valley-East Kern Water Agency's *2010 Urban Water Management Plan*, the LACWWD 40 and Quartz Hill Water District's *2010 Integrated Regional UWMP for the Antelope Valley*, and the *2013 Antelope Valley Integrated Regional Water Management Plan Update*, discussed further below

Water Conservation in Landscaping Act

The Water Conservation in Landscaping Act of 2006 (Assembly Bill [AB] 1881) requires Cities and Counties, including Charter Cities and Charter Counties, to adopt landscape water

conservation ordinances by January 1, 2010. In accordance with this Act, the Department of Water Resources (DWR) prepared a Model Water Efficient Landscape Ordinance, as contained in the *California Code of Regulations* (Title 23, Division 2, Chapter 2.7). Cities and Counties had the option to adopt DWR's ordinance or to develop their own.

Water Conservation Act of 2009

The Water Conservation Act of 2009 or Senate Bill 7 (SBX7_7) was approved in November 2009 and requires urban water retail suppliers in California to reduce per capita water use by at least 10 percent on or before December 31, 2015, and to achieve a 20 percent reduction by December 31, 2020. In their 2010 UWMPs, urban retail water suppliers must include the baseline daily per capita water use, the urban water use target, the interim urban water use target, and the compliance daily per capita water use, along with the basis for determining those estimates and references to the supporting data. Urban wholesale water suppliers must also include an assessment of present and proposed measures, programs, and policies needed to achieve the water use reductions required by this Act. While it does not require existing customers to undertake changes in product formulation, operations, or equipment that would reduce process water use, suppliers may provide technical assistance and financial incentives to those customers to implement efficiency measures for process water.

Urban retail water suppliers and agricultural water suppliers would not be eligible for State water grants or loans for surface water or groundwater storage, recycling, desalination, water conservation, water supply reliability, and water supply augmentation unless they comply with the water conservation requirements established by this Act.

20x2020 Water Conservation Plan

The 20x2020 Water Conservation Plan, issued by the Department of Water Resources (DWR) in 2010 pursuant to the Water Conservation Act of 2009 (SBX7_7), established a water conservation target of a 20 percent reduction in water use by 2020 compared to 2005 baseline use.

Water Supply Assessment

Senate Bill (SB) 610 amended the *California Public Resources Code* and *California Water Code*, effective January 1, 2002, to improve the link between information on water supply availability and land use decisions. Under SB 610 (codified in the *California Water Code* beginning at Section 10910), cities or counties approving certain projects subject to the California Environmental Quality Act (CEQA) are required to identify any public water system that may supply water and request those water systems to prepare a water supply assessment. A water supply assessment is required for any project that is subject to CEQA and that proposes one or more of the following:

- A residential development of more than 500 dwelling units.
- A shopping center or business establishment with either 1,000 employees or more than 500,000 square feet (sf) of floor space.
- A commercial office development with either 1,000 employees or more than 250,000 sf of floor space.
- A hotel or motel with more than 500 rooms.
- An industrial development that has 1,000 employees, occupies more than 40 acres of land, or has more than 650,000 sf of floor space.
- A mixed-use project that includes one or more of the requirements above.

- A project that would require water that is equal to or more than the water demand of 500 dwelling units.
- A project that is served by a public water system having fewer than 5,000 service connections; a proposed residential, business, commercial, hotel or motel, or industrial development that would account for an increase of 10 percent or more in the number of the public water system's existing service connections; or a mixed-use project that would demand an amount of water equivalent to, or greater than, the amount of water required by a residential development that would represent an increase of 10 percent or more in the number of the public water system's existing service connections.

To determine whether a project's water demand is equivalent to, or greater than, the water demand of a 500 dwelling unit development, the DWR assumes an average household of 3.5 people requires 0.5 acre-feet per year (AFY). This average demand results in a threshold of 250 AFY for an equivalent water use of a 500 dwelling unit development, based on a statewide average. However, that level of use has not been achieved in the Antelope Valley; accordingly, the Antelope Valley-East Kern Water Agency (AVEK) threshold for an equivalent water use is 600 AFY, based on an average household use of 1.2 AFY. Los Angeles County Waterworks District No. 40 (LACWWD 40) uses an average of 3.9 AFY per acre, due to increased conservation achieved by its ratepayers, resulting in an equivalent water use threshold of approximately 500 AFY.

As demonstrated in the water supply assessment (see Appendix G-2), a total water demand of 244 AFY is anticipated from the Project at maximum occupancy. The Project's water demand is therefore less than the 250 acre feet per year threshold established by the DWR for determining whether a water supply assessment is required under SB 610 for a water use equivalent to a 500 dwelling unit development. Further, the Project's estimated water demand is below the approximately 500 AFY and 600 AFY thresholds for equivalent water uses, as established by LACWWD 40 and AVEK, respectively. As such, the MLWDC Project is not required to comply with SB 610. However, the County has determined that due to comments provided during the Notice of Preparation (NOP) public review period and due to interest in the topic of water supply as it relates to the proposed Project, a water supply assessment would be prepared that complies with the standards set forth in SB 610.

Therefore, although not required, a determination was made through the preparation of the water supply assessment about whether the projected water supplies will be sufficient to satisfy the demands of the Project, in addition to existing and planned future uses. SB 610 requires a water supply assessment to include the following:

- A discussion of whether the public water system's total projected water supplies available during normal, single dry, and multiple dry water years during a 20-year projection will meet the projected water demand associated with the proposed project, in addition to the public water system's existing and planned future uses, including agricultural and manufacturing.
- The identification of existing water supply entitlements, water rights, or water service contracts relevant to the identified water supply for the proposed project and water received in prior years pursuant to those entitlements, rights, and contracts.
- A description of the quantities of water received in prior years by the public water system under the existing water supply entitlements, water rights, or water service contracts.

- A demonstration of water supply entitlements, water rights, or water service contracts by the following means:
 - a. Written contracts or other proof of entitlement to an identified water supply.
 - b. Copies of a capital outlay program for financing the delivery of a water supply that has been adopted by the public water system.
 - c. Federal, state, and local permits for construction of necessary infrastructure associated with delivering the water supply.
 - d. Any necessary regulatory approvals that are required in order to be able to convey or deliver the water supply.
- The identification of other public water systems or water service contract holders that receive a water supply or have existing water supply entitlements, water rights, or water service contracts, to the same source of water as the public water system.
- If groundwater is included for the supply for a proposed project, the following additional information is required:
 - a. Review of any information contained in the Urban Water Management Plan (UWMP) relevant to the identified water supply for the proposed project.
 - b. Description of any groundwater basin(s) from which the proposed project will be supplied. Adjudicated basins must have a copy of the court order or decree adopted and a description of the amount of groundwater the public water system has the legal right to pump. For non-adjudicated basins, information on whether the DWR has identified the basin as over-drafted or has projected that the basin will become over-drafted if present management conditions continue, in the most current bulletin of DWR that characterizes the condition of the basin, and a detailed description of the efforts being undertaken in the basin to eliminate the long-term overdraft condition.
 - c. Description and analysis of the amount and location of groundwater pumped by the public water system for the past five years from any groundwater basin which the proposed project will be supplied. Analysis should be based on information that is reasonably available, including, but not limited to, historic use records.
 - d. Description and analysis of the amount and location of groundwater projected to be pumped by the public water system from any groundwater basin by which the proposed project will be supplied. Analysis should be based on information that is reasonably available, including, but not limited to, historic use records.
 - e. Analysis of the sufficiency of the groundwater from the basin(s) from which the proposed project will be supplied.

In summary, a water supply assessment must include an evaluation of the sufficiency of the water supplies available to the water supplier to meet existing and anticipated future demands (including the demand associated with the project) over a 20-year horizon that includes normal, single-dry, and multiple-dry years. SB 610 also identifies information that should be included in the UWMP if groundwater is identified as a source of water. Information must include a description of all water supply projects and programs that may be undertaken to meet total projected water use.

Propositions 13, 50, 84, and 1

Through California voters' approval, State funding has been made available to increase the reliability of State water supplies. In March 2000, California voters approved Proposition 13, which authorized the State to issue \$1.97 billion of its general obligation bonds for water projects.

Additionally, California voters approved Proposition 50 in November 2002 and Proposition 84 in November 2006, which authorized State issuance of \$3.4 billion and \$5.4 billion, respectively, of its general obligation bonds for water projects. And in November 2014, voters overwhelmingly approved Proposition 1, which authorized \$7.5 billion in bonds expected to provide a significant infusion of funding for water projects and programs. Types of water projects eligible for funding under Propositions 13, 50, 84, and 1 include water conservation, groundwater storage, surface storage, water treatment, water quality, recycled water, water security, and Colorado River water management projects, many of which are within the scope of the California Plan.

The Antelope Valley region was awarded grant funds from Proposition 84 to update the 2007 Antelope Valley Integrated Regional Water Management Plan (AVIRWMP) to include a regional flood management plan. A major component of that plan will be identifying regional areas that can be used for large scale storm water retention and groundwater recharge in order to increase the amount of annual return flows.

Mandatory Water Conservation

Following Governor Brown's declaration of a State of Emergency, on July 15, 2014 the State Water Board adopted Resolution No. 2014-0038 prohibiting several activities, including (1) the application of potable water to outdoor landscapes in a manner that causes excess runoff; (2) the use of a hose to wash a motor vehicle except where the hose is equipped with a shut-off nozzle; (3) the application of water to driveways and sidewalks; and (4) the use of potable water in non-recirculating ornamental fountains. The State Water Board resolution also directed urban water suppliers to implement the stage of their water shortage contingency plans that impose mandatory restrictions on outdoor irrigation of ornamental landscaping or turf with potable water and report monthly water production information to the State Water Board.

On April 1, 2015, Governor Brown signed Executive Order (EO) B-29-15, which contains a total of 31 directives – the primary requirement being a 25 percent statewide water reduction in potable urban water use through February 28, 2016, as compared to the amount used in 2013. EO B-29-15 requires the State Water Resources Control Board to impose restrictions to achieve the 25 percent reduction, and is directed to consider the relative per capita water usage of each water supplier's service area. Those areas with high per capita use will be required to achieve proportionally greater reductions than those with low use.

Another directive in EO B-29-15 included development of a new Model Water Efficient Landscape Ordinance (MWELo), which was adopted by the State on July 15, 2015. This ordinance will effectively reduce water use for new landscaping and among other things, limits the use of turf in residential landscapes to 20 percent of the total landscaped area, and prohibits the use of turf in non-residential landscapes, unless irrigated with non-potable water. Agencies have until February 1, 2016, to adopt this model ordinance or a similar ordinance and must start reporting on implementation and enforcement of the ordinance by December 31, 2015, and then by January 31st in subsequent years. The impact of this new MWELo will be reduced water demands in new and renovated landscapes, which should further reduce water demand projections from those included in the LACWWD 40's 2010 IUWMP.

Energy Conservation

Title 24, Part 6, Energy Efficiency Standards

The Energy Efficiency Standards for Residential and Nonresidential Buildings (24 *California Code of Regulations* [CCR] Part 6) were established in 1978 in response to a legislative mandate to reduce California's energy consumption. The California Energy Commission (CEC) adopted the

2008 changes to the Building Energy Efficiency Standards in order to (1) “Provide California with an adequate, reasonably-priced, and environmentally-sound supply of energy” and (2) “Respond to Assembly Bill 32, the Global Warming Solutions Act of 2006, which mandates that California must reduce its greenhouse gas emissions to 1990 levels by 2020”. Title 24 Part 6 of the 2013 California Building Standards Code, the 2013 California Energy Code, went into effect on July 1, 2014, and includes energy efficiency updates (CBSC 2015).

Title 24, Part 11, Green Building Standards

The 2013 California Green Building Standards Code (24 CCR Part 11), also known as the CALGreen Code, is a code with mandatory requirements for new residential and nonresidential buildings throughout California. The CALGreen Code is intended to (1) reduce greenhouse gas emissions from buildings; (2) promote environmentally responsible, cost-effective, healthier places to live and work; (3) reduce energy and water consumption; and (4) respond to the directives by the Governor. In short, the code is established to reduce construction waste, make buildings more efficient in the use of materials and energy, and reduce environmental impact during and after construction. The CALGreen Code contains requirements for construction site selection; storm water control during construction; construction waste reduction; indoor water use reduction; material selection; natural resource conservation; site irrigation conservation; and more. The code provides for design options allowing the designer to determine how best to achieve compliance for a given site or building condition. The code also requires building commissioning, which is a process for verifying that all building systems (e.g., heating and cooling equipment and lighting systems) are functioning at their maximum efficiency (CBSC 2015).

Solid Waste Disposal and Recycling

Assembly Bill 341

On October 6, 2011, Governor Brown signed Assembly Bill (AB) 341 establishing a State policy goal that no less than 75 percent of solid waste generated be source reduced, recycled, or composted by 2020, and requiring the California Department of Resources Recycling and Recovery (CalRecycle) to provide a report to the Legislature that recommends strategies to achieve the policy goal by January 1, 2014. The bill also mandates local jurisdictions to implement commercial recycling by July 1, 2012. CalRecycle will review each jurisdiction’s commercial recycling program every two to four years for compliance with AB 341.

California Integrated Waste Management Act

The California Integrated Waste Management Act of 1989 (AB 939) requires all jurisdictions to meet a 50 percent diversion goal by 2000 and thereafter, and requires all Counties to prepare an Integrated Waste Management Plan. The County of Los Angeles has an adopted plan that includes the following mandated components: Source Reduction and Recycling Elements; Household Hazardous Waste Elements; a countywide Siting Element that identifies 15 years of available disposal capacity; and a statement of significant solid waste disposal problems facing the jurisdiction. The term “integrated waste management” refers to the use of a variety of waste management practices to safely and effectively handle the municipal solid waste stream with the lowest adverse impact on human health and the environment.

California Solid Waste Reuse and Recycling Access Act of 1991

Faced with the challenge of trying to implement AB 939, the California Solid Waste Reuse and Recycling Access Act of 1991 was passed by the State legislature and instructs the California Integrated Waste Management Board (CIWMB, now known as “CalRecycle”) to draft a “model

ordinance” for the disposal of construction waste associated with development projects. Since 1994, the CIWMB model ordinance has been in effect for the County. In 2005, Los Angeles County adopted a Construction and Demolition Debris Recycling and Reuse Ordinance, which is discussed further below. This Act also requires local agencies to ensure that development projects have adequate areas for the collection and loading of recyclable materials.

Solid Waste Disposal Measurement Act of 2008

The purpose of the Solid Waste Disposal Measurement Act of 2008 (SB 1016) is to make the process of goal measurement (as established by AB 939) simpler, more timely, and more accurate. SB 1016 builds on AB 939 compliance requirements by implementing a simplified measure of jurisdictions’ performance. SB 1016 accomplishes this by changing to a disposal-based indicator—the per capita disposal rate—which uses only two factors: (1) a jurisdiction’s population (or in some cases employment) and (2) its disposal, as reported by disposal facilities.

Each year CalRecycle calculates each jurisdiction’s per capita (per resident or per employee) disposal rates. If business is the dominant source of a jurisdiction’s waste generation, the CIWMB may use the per employee disposal rate. Each year’s disposal rate will be compared to that jurisdiction’s 50 percent per capita disposal target. As such, jurisdictions will not be compared to other jurisdictions or the statewide average, but they will only be compared to their own 50 percent per capita disposal target. Among other benefits, per capita disposal is an indicator that allows for jurisdiction growth because as residents or employees increase, report-year disposal tons can increase and still be consistent with the 50 percent per capita disposal target. A comparison of the reported annual per capita disposal rate to the 50 percent per capita disposal target will be useful for indicating progress or other changes over time.

Regional

Water Supply

Antelope Valley Integrated Regional Water Management Plan

The *Antelope Valley Integrated Regional Water Management Plan* (AVIRWMP) was developed for the northeastern portion of Los Angeles County (including the City of Lancaster), the southeastern portion of Kern County, and small areas along the western boundary of San Bernardino County. Preparation of the AVIRWMP was a joint effort between LACWWD 40, the Rosamond Community Services District (RCSD), the Quartz Hill Water District (QHWD), and the LACSD. The AVIRWMP provides a description of the participating water agencies and their service area characteristics, including population, climate, water demand, water supply, water conservation, water recycling, and reliability planning. The AVIRWMP discusses each agency’s water supplies, demands, and plans to ensure future reliability. It also encourages the efficient management of water supplies by water transfers and exchanges, desalination, and recycled water opportunities.

Antelope Valley Groundwater Adjudication

Since 1999, several property owners and public water suppliers have initiated legal proceedings in the Superior Court of California to determine the relative rights of users and potential users of the Antelope Valley Groundwater Basin, also called the Antelope Valley Area of Adjudication (AVAA). These proceedings are now consolidated in Los Angeles Superior Court case number 1-05-CV-049053: Antelope Valley Groundwater Cases, Consolidated Proceeding 4408.

The underlying dispute among the parties is the priority/superior right to pump the groundwater and the protection of the groundwater basin. According to the Court's Order After Phase Two Trial on the Hydrologic Nature of Antelope Valley, there are multiple claims to be adjudicated, including "declaratory relief, claims of prescription, claims of overlying owners to quiet title to water rights, claims that portions of the [B]asin should be treated as a separate area for management purposes in the event a physical solution to water use is established, among other issues and claims" (Superior Court of California 2008). Four phases of the trial have been completed in the adjudication during which the Court has defined the adjudication area boundary (i.e., the AVAA) and determined that the total safe yield of the AVAA is 110,000 afy, that the AVAA has been in a state of overdraft for over 50 years, and the current pumping by the parties exceeds the safe yield of the AVAA.

The action will result in a judgment (by trial and/or stipulation) containing a final allocation of groundwater rights and a long-term groundwater management system for the AVAA. The basin will be closed to new ground water pumping once the adjudication is completed. It is unknown how long it will take to complete the adjudication litigation or the quantity of water LACWWD 40 will be allocated in the adjudication. While the adjudication is still in process, the IRUWMP has made projections on the allocations based on historical groundwater pumping use. LACWWD No. 40 is projected to have a constant groundwater pumping rate of 23,200 AFY from 2015-2035. These projections are subject to change after the adjudication has been finalized; however, it is estimated that the 23,200 afy allocation to LACWWD 40 is a conservative value and the final adjudicated amount could be higher.

County

Water Services

Mandatory Water Conservation

In response to the recent Governor's and State Water Board's actions, on July 22, 2014, the Los Angeles County Board of Supervisors approved implementation of the State's regulations effective August 1, 2014. The Board developed different tiers of water use reduction for all 400-plus urban water suppliers ranging from a low of 4 percent to a high of 36 percent reduction in water use compared to Year 2013. LACWWD 40's tier was a 32 percent reduction and through August of 2015, the third month of official reporting, the State reported the District's reduction was 38.9 percent, which exceeded the reduction requirement. These restrictions will be reported monthly and totaled cumulatively for the year. For agencies that miss their reduction targets, the State has the authority to assess penalties for non-compliance. Some of this conservation may be temporary in nature due to the drought. However, with such a substantial reduction required, many of the practices to generate this savings, such as re-landscaping and irrigation system improvements should result in permanent reduction in demand.

The Los Angeles County Waterworks Districts have also restricted outdoor water use to three days per week during the summer and two days per week during the winter. As evidenced by the fact that actual demands in LACWWD 40 are substantially below the projected demand in the 2010 Integrated Regional Urban Water Management Plan (IRUWMP), which is discussed further below, the LACWWD 40 has been successful in reducing water demand through conservation efforts (LACWWD 40 and QHWD 2011). As more existing irrigation demands are converted from potable water to recycled water in the LACWWD 40 service area, these potable demands are expected to continue to decline or at least be offset by new demand for recycled water from growth.

Wastewater Infrastructure and Treatment

County Sanitation District Wastewater Ordinance

The LACSD has adopted a Wastewater Ordinance for the operation and financing of its wastewater conveyance, treatment, and disposal facilities. Under this ordinance, the LACSD requires Industrial Wastewater Discharge Permits that regulate industrial wastewater discharges to protect the public sewage system (LACSD 1998).

Lancaster Water Reclamation Plant 2020 Facilities Plan

The LACSD No. 14 is one of two districts providing wastewater services in the Antelope Valley. LACSD No. 14 serves the City of Lancaster and portions of the City of Palmdale and unincorporated land. This district operates the Lancaster Water Reclamation Plant and approximately 64 miles of trunk sewers. The 2020 Facilities Plan was developed to provide adequate water treatment and effluent management capacity; to eliminate unauthorized effluent-induced overflows; to ensure the quality and quantity of recycled water and to maintain the Piute Ponds. Several alternatives were evaluated as part of the planning process, with the recommended improvements to include: 26 million gallons per day (mgd) of secondary and tertiary treatment capacity; 7,059 acre-feet of additional capacity at new effluent storage reservoirs; 4,650 acres for agricultural reuse operations; recycled water to meet municipal reuse demand; and maintenance of Piute Ponds.

Solid Waste Disposal

County of Los Angeles Integrated Waste Management Plan

In accordance with AB 939 described above, the County adopted its most recent Integrated Waste Management Plan (IWMP) in 1996, which includes the following components: Source Reduction and Recycling Element (SRRE), Household Hazardous Waste Element (HHWE), Countywide Siting Element and the Non-Disposal Facility Element (NDFE). The County SRRE describes policies and programs that the County must implement for its unincorporated areas to achieve the State's mandate of 25 and 50 percent waste disposal reductions by the years 1995 and 2000, respectively. The County HHWE provides for the management of household hazardous waste generated by the residents in its jurisdiction. The Countywide Household Hazardous Waste Management Program, which consists of permanent collection centers and public education/information services, has been formulated to serve residents throughout the County in a convenient and cost-effective manner. The Countywide Siting Element (CSE) projects waste generation and waste disposal capacity within the County. The County NDFE identifies all existing, expansions of existing, and proposed new non-disposal facilities that will be needed to implement its SRRE.

Construction and Demolition Debris Recycling and Reuse Ordinance

The County's Construction and Demolition Debris Recycling and Reuse Ordinance requires all construction projects to recycle at least 50 percent of construction wastes. The ordinance is Chapter 20.87 (Construction and Demolition Debris Recycling and Reuse) in Title 20 of the Los Angeles County Code. The ordinance states that at least 50 percent (by weight) of all construction and demolition (C&D) debris, soil, rock, and gravel removed from a project site must be recycled or reused unless a lower percentage is approved by the Director of Public Works. A Recycling and Reuse Plan (RRP) must be submitted to the Department of Public Works, Environmental Programs Division after an application for a permit has been filed for a project. The RRP must contain a project description; the estimated total weight of C&D wastes; the total weight that would

be recycled or reused; vendors for the recycled or reused C&D wastes; and the percentage recycled and reused. Upon County approval of the RRP, annual progress reports and a final compliance report showing documentation and receipts that the RRP was implemented must be submitted.

Green Building Standards Code

In response to the mandates set forth in the 2010 California Green Building Standards Code (CALGreen Code), the Board of Supervisors initially adopted the Los Angeles County Green Building Standards Code into Title 31 of the County Code. In 2013, the County adopted the updated 2013 CALGreen Code by reference into Title 31 of the County Code, with certain changes and modifications. These modifications include required compliance with the County's Low Impact Development Standards (Chapter 12.84 of Title 12 of the County Code); landscaping requirements (e.g., use of automatic irrigation system controllers, no more than 25 percent of landscaped areas covered with turf; and no less than 75 percent of landscaped areas planted with non-invasive drought-tolerant plants); and construction and demolition debris recycling, salvage, and/or reuse of a minimum of 65 percent of the non-hazardous construction and demolition debris by weight or volume.

Recycling and Waste Reduction Policies

The County has adopted a number of specific policies to recycle and reduce waste from County operations and facilities. These include the purchase and use of re-refined motor oil in all County motorized vehicles and equipment; purchase and use of 30 percent recycled-content paper; mandated recycling programs; electronic waste surplus donation; recycling or donation of used printer cartridges; an environmental purchasing policy; reduced paper-based correspondence; beverage container collection and recycling; paper collection and recycling; purchase and use of remanufactured laser toner cartridges for black and white printers and copiers; restricted use of styrofoam containers; and prohibited use of plastic carryout bags.

Leadership in Energy and Environmental Design Certification for County Buildings

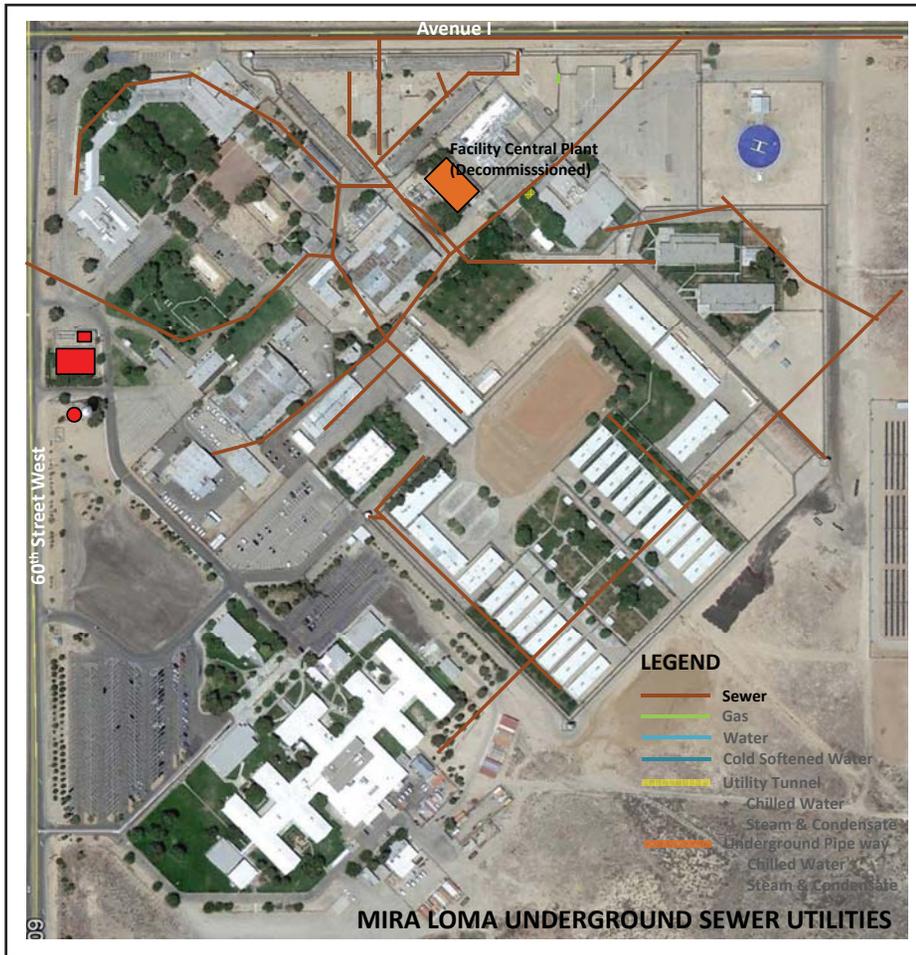
As part of the County's Energy and Environmental Policy, all new County buildings with floor areas greater than 10,000 sf proposed under the County's Capital Project Program are required to have the equivalent of Leadership in Energy and Environmental Design (LEED) Certification at the Silver Level. LEED is the certification standard of the U.S. Green Building Council where buildings are certified for performance under various design and construction categories.

4.14.2 EXISTING CONDITIONS

Exhibit 4.14-1, Existing Wet Utility Infrastructure, depicts the existing on-site and adjacent utilities for water and wastewater systems. Exhibit 4.14-2, Existing Dry Utility Infrastructure, shows overhead and underground electric and telecommunications lines and underground gas lines at the Mira Loma Detention Center (MLDC).

Water Infrastructure and Supply

The Mira Loma Detention Center (MLDC) currently and historically obtains its water supply from an on-site system of groundwater wells, pumps, and tanks. This system provides water to the MLDC; the former High Desert Health System Multi-Ambulatory Care Center (HDHS MACC); the County Probation Department's Challenger Memorial Youth Center (CMYC); and the County Animal Care and Control – Lancaster Shelter, and the residential apartments and bachelor officer's quarters (BOQ) on the west side of 60th Street West.



Underground Sewer Utilities



Underground Water Utilities

Source: DLR Group 2015

Existing Wet Utility Infrastructure

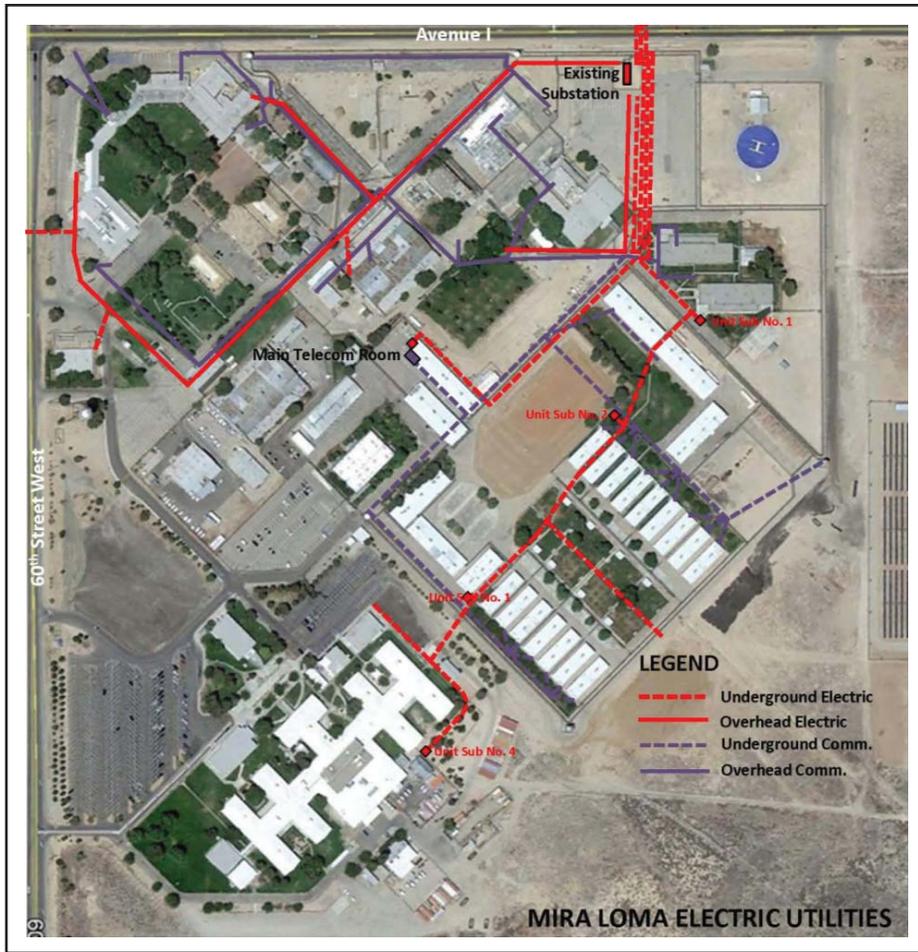
Mira Loma Women's Detention Center



Exhibit 4.14-1

Bonterra
PSOMAS

D:\Projects\COLACEO\001\Graphics\EIR\Ex_ExistingDryUtilities_20151023.ai



Electric and Telecommunications Utilities

Underground Gas Utilities

Source: DLR Group 2015

Existing Dry Utility Infrastructure

Exhibit 4.14-2

Mira Loma Women's Detention Center



The on-site water system draws water from the Antelope Valley Groundwater Basin through two groundwater wells that are located east of 60th Street West on the western edge the MLDC. Well No. 3 is the primary groundwater well, and is equipped with a 60 horsepower motor-driven pump that can pump up to 700 gallons per minute (gpm). The age of the well is approximately 22 to 26 years old, but the electric motor is relatively new (approximately 1.5 years old). An automatic chlorination system is located at the discharge of this well. Well No. 4 is a backup well on stand-by for emergency use only. It is equipped with a natural gas engine driven well that can pump up to 1,000 gpm. There is a third well (Well No. 2), but it is not in use.

The water storage and distribution system is comprised of 1 elevated steel tank with a 100,000-gallon capacity; 1 concrete reservoir with a 400,000-gallon capacity; 2 hydro-pneumatic pressure tanks with a 10,000-gallon capacity each; and 4 booster pumps. Water from Well No. 3 is pumped into the lower reservoir and a booster pump pumps water from the reservoir to the elevated tank. Well No. 4 pumps water to both the lower reservoir and the elevated tank. Water from the reservoir and tank is fed to the site by an 8-inch asbestos cement pipe, with a network of 6-inch water lines servicing various buildings at the MLDC (see Exhibit 4.14-1).

A Water Map entitled "Mira Loma Sheriff's Facility Plan of Primary Water System" dated March 1959 acquired from the Facility Maintenance Bureau indicates that the site water system is a combined system serving both domestic and fire water demands. The map also indicates that 12 fire hydrants are located around the site, with 1 fire hydrant serving as a Fire Department connection. Records of water pumping for the existing wells at the site are provided in Table 4.14-1 below.

**TABLE 4.14-1
HISTORIC WATER USE**

Year	Well No. 3	Well No. 4	Total Gallons	Total Acre-Feet
2009	121,182,724	6,570,218	127,752,942	392.06
2010	109,527,548	533,468	110,061,016	337.76
2011	116,867,520	1,462,340	118,329,860	363.14
2012	95,983,360	1,311,244	97,294,604	298.59

Source: County of Los Angeles 2014.

As shown in Table 4.14-1, total water pumping from the wells 2009 to 2012 ranged from 392.06 to 298.59 acre-feet per year (afy).

LACWWD 40 Water Services

The LACWWD 40 serves the Antelope Valley and has water lines near the Project site; however, the LACWWD 40 does not currently serve the Project site. Along the streets near the site are water lines owned and operated by LACWWD 40, including a 36-inch-diameter, cement-lined, coated steel transmission water main located 25 feet from the property line along 60th Street West and a 12-inch-diameter pipe located 14 feet north of the roadway centerline along West Avenue I.

The LACWWD 40 obtains water primarily from local groundwater resources and imported water from the State Water Project through the AVEK. In the past few years, recycled water has been introduced to the LACWWD 40 service area by the City of Lancaster and the LACSD No. 14 continues to serve recycled water directly to Apollo Park. Table 4.14-2 shows the actual (i.e., not projected) LACWWD 40 water supply sources from 2009 to 2014.

**TABLE 4.14-2
WATERWORKS DISTRICT NO. 40 WATER SUPPLY**

Year	Purchased SWP (acre-feet)	Wells (acre-feet)	Recycled Water (acre-feet)	Total (acre-feet)
2009	30,611	18,265	194	49,070
2010	39,200	7,600	206	47,006
2011	29,764	17,114	221	47,099
2012	31,761	20,361	232	52,354
2013	32,235	19,964	218	52,417
2014	23,608	25,996	843	50,447
SWP: State Water Project				
Source: Psomas 2015.				

The LACWWD 40's groundwater wells extract water from the Antelope Valley Groundwater Basin. This basin is comprised of two primary aquifers: (1) the principal aquifer and (2) the deep aquifer. In general, the principal aquifer is thickest in the southern portion of the Valley near the San Gabriel Mountains, while the deep aquifer is thickest in the vicinity of the dry lakes on Edwards Air Force Base.

Groundwater extractions between 1926 and 1972 resulted in the overdraft of the aquifer causing groundwater levels to drop significantly. The availability of imported water from the California State Water Project (SWP) in the 1970s resulted in stabilization of groundwater levels in some areas of the Antelope Valley, although groundwater levels in general have continued to fall. From the 1990s to the present, agricultural uses have significantly increased groundwater production and exacerbated the drop in groundwater levels across the Basin. As discussed previously, in 1999 agricultural interests in the Antelope Valley initiated litigation in State court seeking to determine certain rights to groundwater. In 2005, some public water suppliers, including LACWWD 40, filed a cross-action seeking an adjudication of groundwater rights within the Antelope Valley Groundwater Basin. Other agencies and parties have filed separate actions concerning groundwater rights in the AVAA.

The imported water supply for the LACWWD 40 comes from the SWP, as contracted through the AVEK. This imported water first became available in 1978. The SWP includes 660 miles of aqueduct and conveyance facilities from Lake Oroville in the north to Lake Perris in the south. The Burns-Porter Act in 1959 provided a mechanism for bonds to be issued to pay for the construction of certain portions of the SWP facilities. The DWR entered into contracts with water districts and regional agencies (SWP Contractors) specifying the amount of SWP water to be delivered to each SWP Contractor. Each SWP Contractor was provided with a contract amount (Table A Amount) and capacity rights to the SWP aqueduct and storage system in return for payments intended to cover operation and maintenance, bondholder obligations, and repayment of moneys loaned from the California Water Fund. The SWP is contracted to deliver a maximum of 4.17 million afy of Table A water to the 29 contracting agencies.

Actual imported water deliveries to AVEK may vary from the request due to variances in supply availability resulting from hydrology, storage availability, regulatory or operating constraints, and other factors. When supply is limited, a reduction of the requested amount is determined per the water allocation rules governing the SWP.

Besides fluctuations in the availability of SWP water, due to periods of drought-related or regulatory supply interruptions in the State, sufficient infrastructure has been constructed so there

are no restrictions on the LACWWD 40's ability to use SWP water from AVEK to meet water demands in its service area, even during peak summer demand periods.

AVEK is the third largest SWP contractor and has a current contractual Table A Amount of 141,400 afy. AVEK provides this water for both agricultural and Municipal and Industrial (M&I) use. AVEK's largest M&I customer is LACWWD 40. Table 4.14-3 provides a summary of the historic and current imported water volumes for LACWWD 40.

**TABLE 4.14-3
HISTORIC IMPORTS FROM THE STATE WATER PROJECT**

Year	Imported Supply (af)	Percent of Total Supply
2005	35,935	65%
2006	46,946	79%
2007	40,212	67%
2008	29,286	54%
2009	30,611	62%
2010	39,200	83%
2011	29,764	63%
2012	31,761	61%
2013	32,235	61%
2014	23,608	47%

af: acre-feet
Source: Psomas 2015

Wastewater (Sewer) Infrastructure and Treatment

The MLDC is served by a 12-inch vitrified clay pipe that increases in size to 15 inches at West Avenue I before it connects to the LACSD's Avenue I West Trunk Sewer located in Avenue I at 30th Street West. This 48-inch trunk sewer has a design capacity of 53.9 mgd and conveyed a peak flow of 7.4 mgd when measured in 2011. This trunk sewer eventually connects to the Lancaster Water Reclamation Plant at 18965 West Avenue D in Lancaster, which has a design capacity of 18 mgd and currently processes an average of 13.4 mgd (LACSD 2014a).

The Lancaster plant produces reclaimed water, dried biosolids (reused off site), and methane gas (used to fuel the on-site boiler for anaerobic digesters). Approximately 3 mgd of reclaimed water is used for farm irrigation, with another 3 mgd used at the Piute Ponds to maintain wetland areas and 0.5 mgd used at the Apollo Lakes Regional Park for irrigation and to maintain the lake's water level (LACSD 2014b). From the 12-inch sewer line on West Avenue I, there are 12-inch lines that extend into the site and connect to the various on-site buildings (see Exhibit 4.14-1).

Storm Drainage Infrastructure

Storm water generally sheet-flows across the pervious areas scattered throughout the site, resulting in some ground percolation. There is a small storm drainage system located in the northern portion of the Project site that drains onto the adjacent West Avenue I. As shown in Exhibit 4.8-1 in Section 4.8, Hydrology and Water Quality, overall the site slopes slightly to the east with runoff flowing towards the solar energy facility and undeveloped land to the east and southeast, respectively. Further to the east, a shallow drainage channel is present along the southern boundary of the CMYC that connects to the earthen drainage channel along 50th Street West. This channel conveys runoff collected from surrounding land uses northerly toward the earthen channel along West Avenue I. Storm water percolates into the earthen channels or flows

northeasterly to the Piute Ponds and Rosamond Lake. Earthen channels along the east side of 60th Street West and the south side of West Avenue I convey storm water from areas adjacent to the Project site toward the northeast to the Piute Ponds and Rosamond Lake.

Solid Waste Management

Solid waste collection services in the City of Lancaster are provided by Waste Management (WM), a private waste hauler and landfill operator. WM operates a transfer station and two landfills in the Antelope Valley: Lancaster Landfill and Recycling Center and Antelope Valley Landfill (WM 2014).

The Antelope Valley Landfill is located on 185 acres at 1200 City Ranch Road in Palmdale. It accepts 3,564 tons of solid wastes per day, of which 1,800 tons are non-hazardous refuse/wastes and 1,764 tons are recyclable materials. This landfill has a remaining capacity of 20.4 million cubic yards in 2011 and is expected to close in 2042 (CalRecycle 2011). This landfill accepts solid wastes from the City of Los Angeles (37 percent), the City of Palmdale (33 percent), Los Angeles County (19 percent), the City of Lancaster (8 percent) and others (3 percent) (LACDPW 2013).

The Lancaster Landfill and Recycling Center is located on 276 acres at 600 East Avenue F in Lancaster. It is permitted to accept a maximum of 5,100 tons per day (tpd), comprised of a maximum 3,000 tons are refuse/wastes and a maximum 2,100 tons of inert debris and recyclable materials. This landfill had a remaining capacity of 14.5 million cubic yards in 2012 and is expected to close in 2025 (based on disposal of 3,000 tpd) or 2044 (based on disposal of the current daily disposal of 1,223 tpd (CalRecycle 2013). This landfill accepts solid wastes from the City of Los Angeles (39 percent), City of Palmdale (6 percent), Los Angeles County (10 percent), City of Lancaster (39 percent), and others (6 percent) (LACDPW 2013).

Electricity and Natural Gas

The Project area is served by SCE for electrical power services and SCG for natural gas services. The utility infrastructure on the site includes electrical power and natural gas distribution systems consisting of overhead and underground lines. Electrical power comes from the SCE lines on West Avenue I and 60th Street West. There is a substation at the northern edge of the Project site (on West Avenue I) connecting to four unit-substations at scattered locations on and near the site, as shown on Exhibit 4.14-2. An emergency generator is present at one unit-substation, which includes an underground fuel tank near the generator. SCG has indicated that there are high-pressure main gas lines in public streets in the area that may serve the Project (SCG 2014). Gas meters at the northern and western edges of the Project site tap existing SCG gas lines on West Avenue I and 60th Street West and connect to underground lines that run throughout the site (see Exhibit 4.14-2).

Telecommunications

Verizon currently serves the site with voice and data services, with a main telecommunications room at the infirmary/processing building (Building 3) that connects to overhead and underground lines to various buildings and the guard towers at the site (Verizon 2015).

Time Warner has aerial and underground cable lines on West Avenue I and 60th Street West, with the line on 60th Street West extending into the MLDC site (Time Warner 2015).

4.14.3 THRESHOLDS OF SIGNIFICANCE

The following thresholds are from the Environmental Checklist in Appendix G of the State CEQA Guidelines. The Project would result in a significant impact related to Utilities and Service Systems if it would:

- Threshold 4.14a:** Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board.
- Threshold 4.14b:** Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects.
- Threshold 4.14c:** Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects.
- Threshold 4.14d:** Have insufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed.
- Threshold 4.14e:** Result in a determination by the wastewater treatment provider which serves or may serve the project that it has inadequate capacity to serve the project's projected demand in addition to the provider's existing commitments.
- Threshold 4.14f:** Be served by a landfill with insufficient permitted capacity to accommodate the project's solid waste disposal needs.
- Threshold 4.14g:** Not comply with federal, state, and local statutes and regulations related to solid waste.

Additionally, this section of the EIR addresses the following threshold of significance. Would the project:

- Threshold 4.14h:** Require or result in the construction of other infrastructure or expansion of existing facilities, the construction of which could cause significant environmental effects.

4.14.4 PROJECT DESIGN FEATURES

PDF UTL-1 The Contractor's Specifications will require that the Project will include the following on-site utility infrastructure improvements:

- New on-site fire and domestic/potable water pipelines that connect to all existing and new buildings, and includes new fire hydrants, as required by the County of Los Angeles Fire Department and/or Department of Public Works.
- New connections of the existing on-site sewage pipelines to ensure connection to new on-site buildings.
- New on-site storm drainage pipelines and facilities that connect with existing storm drain infrastructure that complies with storm water quality and quality control requirements under the County's SUSMP, LID standards, and Green Building Standards Code.

PDF UTL-2 The Contractor's Specifications will require that the Project will include a new off-site 12-inch water pipeline extension from the on-site water lines to the existing water main within West Avenue I. The extension will connect from either 60th Avenue West or from the northern boundary of the site near the helipad, to the existing 12-inch LACWWD 40-owned distribution pipeline in West Avenue I. Existing connections to existing groundwater wells and reservoirs located adjacent to 60th Street West will be severed. The Project's disconnection from the existing water distribution system will be conducted in such a manner as to ensure the integrity of the existing wells, pumps, reservoirs, and water lines for continued use by other County-owned facilities currently being served by this water system.

PDF HYD-1 from Section 4.8, Hydrology and Water Quality is also applicable to Utilities and Service Systems:

4.14.5 REGULATORY REQUIREMENTS

RR UTL-1 The Project will be designed, constructed and operated in accordance with the County of Los Angeles Sanitation District's (LACSD's) Wastewater Ordinance, all wastewater discharges into LACSD facilities shall be required to comply with the discharge standards set forth to protect the public sewage system.

RR UTL-2 The Project's water, sewer, storm drain, and other utility infrastructure improvements will be designed, constructed and operated in accordance with the applicable regulations set forth in the Los Angeles County Code, which incorporates by reference the California Building Code, the California Electrical Code, the California Mechanical Code, the California Plumbing Code, the California Fire Code, and the Green Building Standards Code.

RR UTL-3 The Project will be constructed in accordance with the County's Green Building Standards Code and Construction and Demolition Debris Recycling and Reuse Ordinance, which requires a minimum of 65 percent of the "non hazardous construction and demolition debris" (by weight or volume) to be recycled or reused unless a lower percentage is approved by the Director of Public Works.

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

RR AIR-1, RR HAZ-1 and RR HAZ-2 are also applicable to Utilities and Service Systems:

4.14.6 ENVIRONMENTAL IMPACT ANALYSIS

Threshold 4.14a Would the project exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?

Short-Term Construction Impacts

Construction activities would not require the disposal of building or demolition wastes through the sewage system. Activities and materials used on construction sites may be a source of pollutants (e.g., paints, lacquers, and primers; herbicides and pesticides; landscaping and soil stabilization residues; soaps and detergents; wood preservatives; equipment fuels, lubricants, coolants, and hydraulic fluids; and cleaning solvents). Hazardous materials and wastes cannot be legally disposed of via the sewage system, but must be appropriately disposed in accordance with local,

State, and federal laws (RR HAZ-1 and RR HAZ-2). Impacts would be less than significant. Implementation of mitigation measures (MMs) in Section 4.7, Hazards and Hazardous Materials, would also ensure the proper disposal of hazardous materials and wastes that are present on the site.

Long-Term Operational Impacts

Per PDF UTL-1, extensions of the existing on-site wastewater infrastructure would be required to connect new on-site buildings to the sewage system. Wastewater from the Project would be conveyed via existing and new sewer lines serving the MLDC, which would be treated by facilities owned and operated by LACSD No. 14 at the Lancaster Water Reclamation Plant. The wastewater treatment requirements issued by the Lahontan Regional Water Quality Control Board (RWQCB) for the treatment plant were developed to ensure that adequate levels of treatment would be provided for wastewater flows emanating from all land uses in its service area.

The Project would not generate industrial wastewater (i.e., wastewater from manufacturing, processing, institutional, commercial, or agricultural operation, or any operation where the wastewater discharged includes significant quantities of waste of non-human origin). However, it would still have to comply with the LACSD's Wastewater Ordinance (RR UTL-1). This ordinance requires that all wastewater discharges into LACSD facilities comply with the discharge standards. Project compliance with RR UTL-1 would ensure that the Project's long-term operation would not exceed the RWQCB's wastewater treatment requirements. Impacts would be less than significant and no mitigation is required.

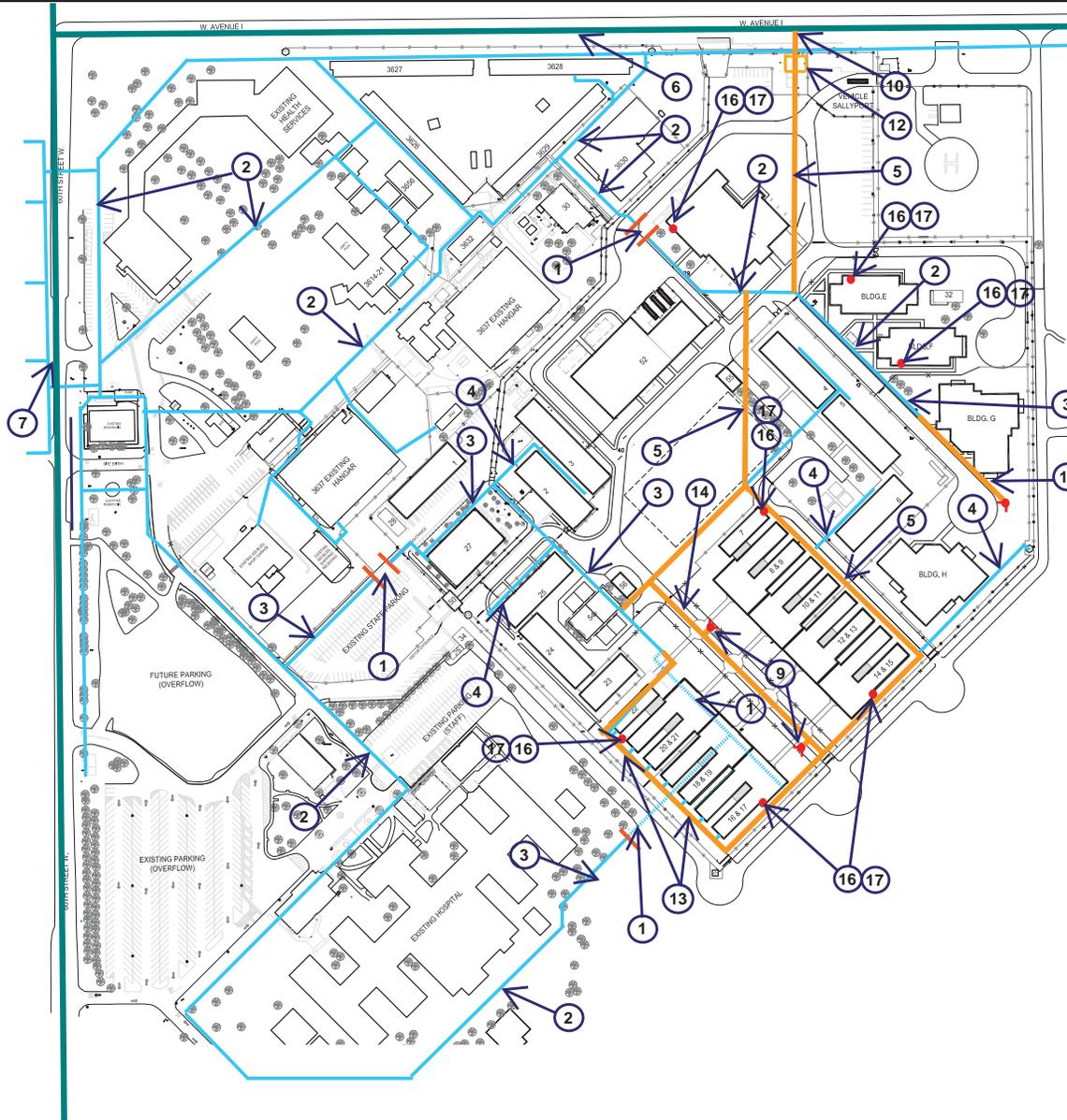
Threshold 4.14b: Would the project require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

Short-Term Construction Impacts

Spraying water on exposed soils for dust suppression during earth-disturbing activities (e.g., grading and trenching) would be required in order to comply with the Antelope Valley Air Quality Management District's (AVAQMD's) Rules 402 and 403, which set forth requirements for controlling fugitive dust and avoiding emission nuisances (see RR AIR-1). However, the Project would not involve extensive grading due to the developed nature of the site and the proposed rehabilitation and reuse of the existing buildings at the MLDC.

Water use and wastewater generation during construction would be short-term and in limited quantities. Existing water lines from the on-site wells and existing sewer lines connected to the LACSD No. 14 sewer mains would be used during this phase. No new water or sewer lines would be needed during the construction phase. Impacts would be less than significant and no mitigation is required.

Per PDF UTL-1, a new on-site water distribution system for both water and fire suppression would be constructed on the Project site, as shown in Exhibit 4.14-3, Proposed Water Infrastructure. As shown, existing water lines would be capped, plugged and disconnected from water lines connecting to existing water wells and reservoirs at the MLDC and from water lines serving off-site buildings. A new domestic water and fire water pipeline system would be installed that would be connected to the existing 12-inch LACWWD 40-owned distribution pipeline in West Avenue I. New and existing water lines would extend from this connection to serve individual buildings and areas at the MLWDC. New fire hydrants would also be located throughout the site. Accordingly, water service to the Project would be provided by LACWWD 40.



1. CAP, PLUG AND DISCONNECT THIS EXISTING LINE.
 2. EXISTING 8" DIAMETER WATER PIPE TO REMAIN
 3. EXISTING 6" DIAMETER WATER PIPE TO REMAIN
 4. EXISTING 2" DIAMETER WATER PIPE. TO REMAIN
 5. NEW PROPOSED COMBINED DOESTIC AND FIRE 8" WATER LINE (TO BE SIZED BY DB CONTRACTOR
 6. EXISTING 12" DIAMETER LOS ANGELES COUNTY WATER MAIN
 7. EXISTING 36" DIAMETER LOS ANGELES COUNTY WATER MAIN
 8. RECONNECT TO EXISTING BUIDG. RESIZE IF NEEDED BY D/B CONTRACTOR.
 9. RECONNECT WATER TO EXISTING FIRE HYDRANT IN PLACE AND RELOCATE FIRE HYDRANT PER NEW SITE LAYOUT.
 10. TAP NEW CONNECTION TO 12" DIAMETER STREET WATER MAIN AT AVENUE I.
 11. NOT USED
 12. NEW COMBINED BACKFLOW DEVICE.
 13. NEW PROPOSED LINE 6" (TO BE RESIZED BY D/B CONTRACTOR. FOR DOMESTIC WATER AND FIRE SPRINKLERS.
 14. NEW PROPOSED 6" WATER LINE FOR FIRE HYDRANTS.
 15. NEW PROPOSED FIRE HYDRANTS
 16. NEW PROPOSED FIRE RISER
 17. PROVIDE BACKFLOW DEVICE FOR EACH CONNECTION TO EXISTING BUILDING AND NEW BUILDINGS.
- NOTES:
NEW PROPOSED LINE 8" (TO BE SIZED BY D/B CONTRACTOR) COMBINED WATER LINE.



Source: DLR Group 2015

Proposed Water Infrastructure

Exhibit 4.14-3

Mira Loma Women's Detention Center



Physical impacts related to the construction of new, on-site water infrastructure are addressed as part of the Project analyzed throughout this EIR. As stated in PDF UTL-2, the Project would require the severance (i.e., cap, plug and disconnect) of water connection to the existing wells and reservoirs located adjacent to 60th Street West. The Project's disconnection from the existing water distribution system would be conducted in such a manner as to ensure the integrity of the existing wells, pumps, reservoirs, and water lines for continued use by other County-owned facilities currently being served by this water system.

The sewer lines that would serve the Project are shown in Exhibit 4.14-4, Proposed Sewer Infrastructure. Most of the existing sewer lines on-site would continue to be used by the Project. However, the existing sewer line crossing the barracks buildings would be abandoned (i.e., capped, plugged, and disconnected/removed) and a new 12-inch sewer line would be provided along the perimeter road at the southeastern edge of the site and connecting to existing on-site sewer lines.

The primary environmental impacts associated with on-site water and sewer infrastructure installation would be related to air quality and noise, as this component of construction involves mainly grading, excavation, and movement and placement of the infrastructure lines and facilities. As discussed in Section 4.2, Air Quality, Section 4.7, Hazards and Hazardous Materials, and Section 4.10, Noise, there would be less than significant impacts related to the construction of water infrastructure and no further mitigation would be required.

Long-Term Operational Impacts

Water Service

Design and installation of the on-site water lines would be in accordance with applicable regulatory requirements (RR UTL-2), including the Los Angeles County Code, which incorporates by reference the California Building Code, the California Electrical Code, the California Mechanical Code, the California Plumbing Code, and the California Fire Code, subject to specific amendments. As such, long-term operation of the proposed water lines would not result in environmental impacts. There would be no impact and no mitigation is required.

As stated in PDF UTL-2, the Project would include a new off-site 12-inch water pipeline extension from the on-site water lines to the existing water main within West Avenue I. The extension would connect from the northern boundary of the site near the helipad, to the existing 12-inch LACWWD 40-owned distribution pipeline in West Avenue I. Existing connections to existing groundwater wells and reservoirs located adjacent to 60th Street West will be severed. The Project's disconnection from the existing water distribution system will be conducted in such a manner as to ensure the integrity of the existing wells, pumps, reservoirs, and water lines for continued use by other County-owned facilities currently being served by this water system.

The proposed water line extension and connection would result in construction impacts similar to those discussed above for on-site water line improvements. Compliance with RR UTL-2 for construction of the water lines in accordance with applicable regulatory requirements and implementation of RRs for construction activities would prevent any significant adverse impacts from the construction of the water line connection. Impacts would be less than significant and no mitigation is required.

The use of water supplies from LACWWD 40 would not require other new facilities that may have impacts. The water supply assessment for the Project indicates that the LACWWD 40 would be able to meet the projected demands in its service area, along with the Project's demands, through the next 20 years. The reliability of the LACWWD 40's future water supplies will be ensured

through continued implementation of programs for water banking; purchase of new imported supplies; water transfers; water conservation; and expansion of recycled water systems. No impact to the LACWWD 40 facilities would occur due to future water service to the Project.

Sewer Service

Existing sewer lines would not require upgrading but new laterals would be provided to serve new buildings and accommodate the Project's anticipated sewage flows (see PDF UTL-1). Sewer lines at the site would have to be constructed in accordance with RR UTL-2. The impacts associated with installation of new sewer lines have been addressed in this EIR, as they relate to the potential for air pollutants and storm water pollutants and noise during construction activities. Less than significant impacts related to the construction of sewer infrastructure would occur with the Project and no mitigation would be required.

There is an existing sewer line that conveys wastewater from the site to the Lancaster Water Reclamation Plant. The Project would increase the number of people at the site, resulting in an increase in the amount of wastewater conveyed and treated by LACSD 14. The Project has the option of connecting to the 15-inch sewer line in West Avenue I directly or to the 12-inch on-site lateral, depending upon the final building design and possible conflicts with other existing utilities or proposed construction on the site.

As discussed under Threshold 4.14e below, there is remaining capacity in the West Avenue I trunk sewer and at the Lancaster Water Reclamation Plant to serve the Project. No new wastewater treatment facilities or expansion of existing facilities is needed. Finally, compliance with RR UTL-1 would ensure that the Project complies with applicable LACSD discharge standards. Impacts would be less than significant and no mitigation is required.

Off-Site Impacts

The proposed driveway improvements would not require new water or sewer lines. A number of water lines are proposed outside the site boundaries to provide efficient water service to the Project (see Exhibit 4.14-3). These proposed water line extension and connection to the LACWWD 40 line on West Avenue I would facilitate water service to the Project, but would not require new water facilities. No impact would occur.

Threshold 4.14c: Would the project require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

Short-Term Construction Impacts

Construction activities would not increase the amount of surface runoff because the ground surface would remain pervious until paving or new building construction is complete; therefore, construction activities would have no impact on the capacity of existing or planned storm water drainage systems. Physical impacts related to the construction of new, on-site storm drain infrastructure are addressed as part of the Project analyzed throughout this EIR. The primary environmental impacts associated with installation of on-site storm drainage infrastructure would be related to water quality, air quality and noise, as this component of construction involves mainly grading, excavation, and movement and placement of the infrastructure materials. As discussed in Section 4.2, Air Quality, Section 4.7, Hazards and Hazardous Materials, Section 4.8, Hydrology and Water Quality, and Section 4.10, Noise, there would be less than significant impacts related to the construction of storm drain infrastructure and no additional mitigation would be required.

Long-Term Operational Impacts

As previously discussed in Section 4.8, Hydrology and Water Quality, the Project would comply with the County's Low Impact Development (LID) standards and the California Green Building Standards Code, which requires the storm drainage system to incorporate source-control, site-design, and treatment-control BMPs to reduce pollutants in the storm water and to reduce runoff rates and volumes to match existing conditions (PDF HYD-1).

The Project includes improvements to the on-site storm drain system that will include new storm drain lines, catch basins with filter inserts, bioswales, and an underground retention and infiltration structure to remove pollutants from the storm water and prevent an increase in runoff volumes and rates, as part of PDF HYD-1 as shown in Exhibit 4.8-2, Proposed Stormwater Treatment BMPs, in Section 4.8, Hydrology and Water Quality.

Catch basin filter inserts would trap sediments before entering into the bioswales and an underground retention and infiltration structure. The bioswales and the underground retention and infiltration structure would also remove pollutants and improve water quality, as well as reduce storm water runoff by ground infiltration. While geotechnical studies would confirm the design infiltration rate at the specific locations of bioswales and the underground infiltration retention structure, the storm drain system would protect the buildings from the 50-year recurrence period storm event and allow overland flow escape routes for the floodwater to discharge to the adjacent road drainage ditches and undeveloped lands.

In addition, the on-site storm drainage system would be designed for a 25-year recurrence period storm and in accordance with the Los Angeles County hydrology manual and LID standards. As standard engineering practice, the system should be set at elevations that would allow the storm water overflow to be discharged into the adjacent road drainage ditch on West Avenue I and undeveloped land to the east, as there are no subsurface storm water drains with which to connect. This may require the use of surface swales instead of buried pipes. Final design of the storm drainage system would be made by the design-build contractor as part of the final construction plans for the Project.

With implementation of PDF HYD-1, no major increase in runoff volumes and rates from the Project site would occur. Thus, it is not expected that an upgrade of off-site storm drainage lines and facilities serving the site would be needed. The Project would have no impact on the capacity of existing off-site storm drain facilities serving the site. No mitigation is required.

Off-Site Impacts

Proposed driveway improvements would be at-grade and the water line extension and connection would be underground. These off-site improvements would not affect storm drainage. No impact would occur.

Threshold 4.14d: Would the project have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?

Short-Term Construction Impacts

Water use during construction would be short-term and in limited quantities. Existing water lines connected to the on-site wells would provide the needed water for construction activities. No new water supplies are needed. Impacts would be less than significant and no mitigation is required.

Long-Term Operational Impacts

Water supply to the MLDC was historically provided by two water wells at the site that pump water from the underlying groundwater basin into an elevated water storage tank and a surface reservoir along 60th Street West. Historic water use data from 2009 to 2012 shows water use ranged from 298.59 to 393.06 afy.

To fully disclose and analyze the Project's potential water impacts and respond to water supply-related comments raised during the EIR scoping process, the water supply assessment was prepared in compliance with the requirements of SB 610, although the Project is not required to conduct this analysis because Project-related water demands would not meet the threshold requirement for preparation of a water supply assessment, as previously discussed. The County's decision to prepare the water supply assessment for this Project is not an authoritative interpretation of the types of projects that should be required to prepare a water supply assessment per SB 610; other Lead Agencies may choose to make different decisions on similar projects, with regards to the applicability of SB 610.

As discussed previously, the 2010 IRUWMP is the current Urban Water Management Plan for the Project area and therefore applies to the analysis of the Project's water supply. It is noted that in 2014, the LACWWD 40 supplied 49,604 afy¹ to serve demand within their service area, which is 10,196 afy less than the existing demand of 59,800 afy identified for 2010 and 21,696 afy less than the projected water demand of 71,300 afy for 2015. Other than minor variations in demand, likely due to changes in precipitation, the total demand has been relatively consistent over the past six years. This is likely due to the fact that demand is being reduced due to effective conservation efforts being undertaken by the Los Angeles Waterworks Districts (including LACWWD 40), including more stringent building codes as well the use of more efficient appliances (e.g., high-efficiency washing machines, high-efficiency toilets, waterless urinals, more efficient irrigation equipment). As such, the water supply and demand projections in the 2010 IRUWMP are conservative based on current conditions.

Water demand from the Project is estimated at 112 gallons per inmate/staff member. With 1,604 inmates and an average of 174 staff per day (523 total staff over 3 shifts), indoor water demand is estimated at 199,136 gallons per day (gpd) or 223 afy. Outdoor water use for landscape irrigation is estimated at 21 afy based on the proposed landscape plan, typical plant factors, and the typical evapotranspiration rate for the Antelope Valley area. A total water demand of 244 afy is anticipated from the Project at maximum occupancy. The Project's water demand is therefore less than the 250 acre feet per year threshold established by the DWR for determining whether a water supply assessment is required under SB 610 for a water use equivalent to a 500 dwelling unit development. Further, the Project's estimated water demand is also below the 500 afy and 600 afy thresholds for equivalent water uses, as established by LACWWD 40 and AVEK, respectively. To ensure consistency with the adopted plan (2010 IRUWMP) and provide a conservative analysis, the projections from the 2010 IRUWMP are used as the basis of the water supply assessment. As noted previously, this water demand would represent new water demand from the LACWWD 40 that was not included in the County's 2010 IRUWMP for the Antelope Valley, because the MLDC was not previously served by the LACWWD 40. This demand is less than ½ of 1 percent of the LACWWD 40's 2014 total supply of 50,447 afy.

LACWWD 40 Water Services

In 2014, LACWWD 40 obtained approximately 25,996 acre-feet (51.5 percent of its water supply) from its groundwater wells and 23,608 acre-feet (46.8 percent) from imported water supplied by

¹ This water amount excludes recycled water use but includes unaccounted-for water.

AVEK. Approximately 1.7 percent of the water delivered within LACWWD 40's service area was recycled water from the LACSD. Over the past five calendar years, these water supply percentages averaged approximately 36.5 percent from groundwater, 62.8 percent from AVEK, and 0.7 percent from recycled water.

It is estimated that approximately 69 percent of AVEK's available allocation each year will be available to serve LACWWD 40. This percentage was taken from AVEK's 2010 UWMP and is based on the amount of property taxes paid by AVEK customers and the historic amount of water each retailer has purchased from AVEK. The percentage is subject to change dependent on the development and usage patterns in the Antelope Valley in the future. AVEK estimates that 61,000 afy of imported water would be provided to LACWWD 40 in each average year.

LACWWD 40 Projected Water Demands

Table 4.14-4 shows the demand projections for LACWWD 40, as derived from the IRUWMP.

**TABLE 4.14-4
WATERWORKS DISTRICT NO. 40 DEMAND PROJECTIONS**

	2015 (afy)	2020 (afy)	2024 (afy)	2030 (afy)	2035 (afy)
Existing Demand	59,800	53,000	53,000	53,000	53,000
Projected Demand	11,500	22,900	34,400	45,800	57,200
<i>Subtotal</i>	<i>71,300</i>	<i>75,900</i>	<i>87,400</i>	<i>98,800</i>	<i>110,200</i>
Committed Demand	20,600	20,600	20,600	20,600	20,600
Total Demand	91,900	96,500	108,000	119,400	130,800

afy: acre-feet per year.

Notes:

- Existing Demand for 2020 reflects meeting SB X7_7 goal.
- The Committed Demand of 20,600 afy represents the demand previously committed to development projects but for which the particular projects represented by these demands have not as yet come on line.

Source: Psomas 2015

The 2010 IRUWMP projected the 2015 demand to consist of an existing component of 59,800 afy and a projected component (demand from new growth and development in the Antelope Valley) of 11,500 afy for a total of 71,300 afy. However, the 2014 supply for the LACWWD 40 was only 50,447 afy (see Table 4.14-2 above). This indicates that much of the projected growth did not occur and water conservation has reduced existing demands significantly. Based on the above, demands have been substantially less than projected in the IRUWMP.

The IRUWMP showed a reduction in existing demand from 2015 to 2020 of 6,800 afy to effectively reach LACWWD 40's SB X7_7 20x2020 water conservation goal. Assuming projected growth adds another 2,000 afy between 2014 actual demands and 2015 (approximate annual growth used in IRUWMP), the 2015 demand will be approximately 52,500 afy, which would be less than the projected existing demand of 53,000 afy for 2020 utilized to reach the SB X7_7 conservation goal.

LACWWD 40 Projected Water Supplies

Reliability is a measure of a water system's ability to manage water shortages. Reliability planning requires information about the following: (1) expected frequency and severity of shortages; (2) how additional water management measures are likely to affect the frequency and severity of

shortages; and (3) how available contingency measures can reduce the impact of shortages when they occur. The reliability of the LACWWD 40's water supply is currently dependent on the reliability of both groundwater, which will be managed by a water master following the final resolution of the adjudication previously discussed, and imported water supplies, which are managed and delivered by AVEK. In light of the ongoing water supply challenges within the region, the goal and statutory mission of these agencies are to identify and develop projects to meet the water demands in the region.

The LACWWD 40 implements a number of programs to increase its water supply; reduce water demands; and improve supply reliability. These include the following:

- Taking steps to limit dependence on imported water by maximizing use of recycled water.
- Expanding conservation efforts.
- Acquiring new supplies through New Supply Acquisition program and the related Memorandum of Understanding (MOU) with AVEK.
- Creating a combination of local surface spreading facilities to percolate untreated SWP water and Aquifer Storage and Recovery (ASR) wells to inject water.
- Adding additional groundwater extraction capacity in order to recover stored water.
- Pursuing an exchange program with agricultural interests to replace their groundwater use with recycled water thereby providing additional potable groundwater for municipal use.
- Constructing new infrastructure to deliver recycled water for non-potable uses.
- Conducting further project development to use recycled water to replenish the Basin.

The LACWWD 40 has implemented a New Supply Acquisition program to provide funding for additional imported water supplies. The Los Angeles County Board of Supervisors has approved an MOU on behalf of the LACWWD 40 with AVEK, the wholesale water agency in the area and SWP contractor, to provide funds from these developer deposits to AVEK. After funds are collected by the LACWWD 40, they are deposited with AVEK, who will then confirm to the LACWWD 40 that it has received the required deposit and is committed to acquiring the additional requested water supplies. The LACWWD 40 also has a standard New Water Supply Entitlement Acquisition Agreement to be executed by developers in the LACWWD 40 that require water service and additional water supplies.

The LACWWD 40's ASR program includes the use of 20 existing wells for direct injection of treated SWP water into the aquifer. The LACWWD 40 is also working on a regional flood management plan to increase storm water retention and groundwater recharge. Options for water banking and participation in desalination projects are being considered.

Table 4.14-5 shows the LACWWD 40's projected water supplies, as taken from the IRUWMP. The projected water supplies for the LACWWD 40 would come from groundwater resources at a constant of 23,200 afy² to 2035 and imported water supplies at a constant of 61,000 afy.³ Additional water supplies to meet the projected demands (shown in Table 4.14-4) would be provided by anticipated new imported water supplies and from increasing recycled water use.

² This is based on a conservative estimate of the average long-term groundwater allocation that would be provided to the LACWWD 40 as part of the ongoing groundwater basin adjudication process.

³ This is based on the following assumption from the 2009 SWP Reliability Report: an average of 60 percent SWP reliability during normal years.

**TABLE 4.14-5
WATERWORKS DISTRICT NO. 40 SUPPLY PROJECTIONS**

	2015 (afy)	2020 (afy)	2024 (afy)	2030 (afy)	2035 (afy)
Existing Water Supply					
Groundwater	23,200	23,200	23,200	23,200	23,200
Imported Water	61,000	61,000	61,000	61,000	61,000
<i>Total Existing Supply</i>	<i>84,200</i>	<i>84,200</i>	<i>84,200</i>	<i>84,200</i>	<i>84,200</i>
Difference (supply minus demand from Table 4.14-4)	(7,700)	(12,300)	(23,800)	(35,200)	(46,600)
Planned Water Supply					
Groundwater Banking	–	–	–	–	–
New Supply Acquisition Program	2,300	4,100	12,900	21,600	30,300
Recycled Water	5,400	8,200	10,900	13,600	16,300
<i>Total Planned Supply</i>	<i>7,700</i>	<i>12,300</i>	<i>23,800</i>	<i>35,200</i>	<i>46,600</i>
Total Existing and Planned Supply	91,900	96,500	108,000	119,400	130,800
afy: acre-feet per year Source: Psomas 2015					

A comparison of the projected demand and supply (Tables 4.14-4 and 4.14-5) with the 2014 actual supply (Table 4.14-2) highlights two important facts. First, existing demand for 2015 would be around 52,500 AFY; if the existing demand from 2014 was added to an annual growth of approximately 2,000 AFY based on projected demand estimates from Tables 4.2 and 4.3. The Existing Demand from the 2010 IRUWMP is over 7,000 AFY higher than this estimate, but the Project's water supply assessment utilizes the IRUWMP projections for consistency with the adopted IRUWMP and to be conservative. An additional 244 AFY is added to the 2020 year to account for the water to be purchased for the proposed MLWDC Project (see discussion on following page).

A second distinction between 2014 recycled water supplies shown in Table 4.1 and those estimated in the 2010 IRUWMP shown in Table 4.3 is that recycled water conversion has lagged behind the projections in the IRUWMP. Assuming the 843 AFY of actual recycled water use in 2014 increases to approximately 1,000 AFY in 2015, the 5,400 AFY estimate included in the IRUWMP would be 4,400 AFY short. Some of that 4,400 AFY of recycled water demand was to be converted from existing potable demands and some was likely to be from new Projected Demand that may have not come on line yet. In order to stay consistent with the adopted 2010 IRUWMP and because the recycled water demands could catch up over the next 20 years, the Project's water supply assessment uses the same projections for recycled water use as projected in the IRUWMP.

Revised LACWWD 40 Projected Water Demand and Supplies

The projected water supplies for the LACWWD 40 would continue to be met by groundwater resources at a constant of 23,200 afy to 2035. However, imported water supplies would change. The DWR updates the reliability of the SWP supplies every two years. Since the 2010 IRUWMP was prepared two reports have been published by DWR, in 2011 and 2013. The most recent report, the *State Water Project Draft Delivery Reliability Report 2013* (2013 Reliability Report; dated December 2013⁴) has been used to update the Imported Water Supply row in Table 4.14-5

⁴ A Draft 2015 Report was posted on DWR's website in early May 2015 but is out for public comment and the values are similar to the 2013 Report, so the 2013 Report is used herein.

above. The 2010 IRUWMP assumed an average of 60 percent SWP reliability during normal years based on the 2009 SWP Reliability Report; the 2013 Reliability Report increases reliability to 62 percent during existing (2013) conditions but reduces reliability to 58 percent during future (2033) conditions. Therefore, adjustments to the amount of Imported Water available to LACWWD 40 have been made to reflect the most recent SWP Reliability Report. Table 4.14-6, Revised Waterworks District No. Demand and Supply Projections, summarizes the LACWWD 40 resources through 2035 based on the SWP reliability adjustment and the addition of 244 afy to the year 2020 to account for the water that would be purchased for the Project.

The projected demand versus supply volumes listed in Table 4.14-6 show shortages in existing supply versus projected demand when including the Committed Demand. However, these shortages are substantially the same as those projected in the 2010 IRUWMP. As stated previously, the demand projections from the 2010 IRUWMP and used herein are conservatively higher than actual demand in the current timeframe. If and when the substantial amount of Committed Demand shown in the tables above comes on line, shortages in supply could arise. Therefore, LACWWD 40 has implemented the New Supply Acquisition program to provide funding for additional water supplies, as discussed above.

**TABLE 4.14-6
REVISED WATERWORKS DISTRICT NO. 40
DEMAND AND SUPPLY PROJECTIONS**

	2015 (afy)	2020 (afy)	2025 (afy)	2030 (afy)	2035 (afy)
Demand					
Existing Demand	59,800	53,000	53,000	53,000	53,000
Projected Demand Beyond 2015	11,500	22,900	34,400	45,800	57,200
<i>Subtotal</i>	<i>71,300</i>	<i>75,900</i>	<i>87,400</i>	<i>98,800</i>	<i>110,200</i>
Committed Demand	20,600	20,600	20,600	20,600	20,600
Proposed Project	0	244	244	244	244
Total Demand	91,900	96,700	108,200	119,600	131,000
Existing Water Supply					
Groundwater	23,200	23,200	23,200	23,200	23,200
Imported Water	63,500	62,500	61,400	60,400	59,400
Total Existing Supply	86,700	85,700	84,600	83,600	82,600
<i>Difference (supply minus demand)</i>	<i>(5,200)</i>	<i>(11,000)</i>	<i>(23,600)</i>	<i>(36,000)</i>	<i>(48,400)</i>
Planned Water Supply					
Groundwater Banking	–	–	–	–	–
New Supply Acquisition Program	22,300	44,100	12,900	22,400	32,100
Recycled Water	5,400	8,200	10,900	13,600	16,300
Total Planned Supply	7,700	12,300	23,800	36,000	48,400
Total Existing and Planned Supply	94,400	98,000	108,400	119,600	131,000
afy: acre-feet per year					
Note:					
All values are rounded to the nearest 100 afy, except the Proposed Project					
Source: Psomas 2015					

LACWWD 40's projected demands and supplies for a Single Dry Year Condition are shown in Table 4.14-7.

**TABLE 4.14-7
LACWWD 40 PROJECTED WATER DEMAND AND SUPPLY
SINGLE DRY YEAR (AFY)**

	2015	2020	2025	2030	2035
Demand					
Existing Demand	59,800	53,000	53,000	53,000	53,000
Projected Demand Beyond 2015	11,500	22,900	34,400	45,800	57,200
Subtotal	71,300	75,900	87,400	98,800	110,200
Committed Demand	20,600	20,600	20,600	20,600	20,600
Proposed Project	0	244	244	244	244
Total Demand	91,900	96,700	108,200	119,600	131,000
Existing Water Supply					
Groundwater	23,200	23,200	23,200	23,200	23,200
Imported Water	12,300	12,050	11,800	11,550	11,300
Total Existing Supply	35,500	35,250	35,000	34,750	34,500
Difference (supply minus demand)	(56,400)	(61,450)	(73,200)	(84,850)	(96,500)
Planned Water Supply					
Groundwater Banking	50,600	52,450	59,700	67,050	73,600
New Supply Acquisition Program	400	800	2,600	4,200	6,600
Recycled Water	5,400	8,200	10,900	13,600	16,300
Total Planned Supply	56,400	61,450	73,200	84,850	96,500
Total Existing and Planned Supply	91,900	96,700	108,200	119,600	131,000
afy: acre-feet per year					
Note:					
All values are rounded to the nearest 100 afy, except the Proposed Project					
Source: Psomas 2015.					

Typically water supply assessments require analysis of a 3-year dry period. However, LACWWD 40's IUWMP conservatively assumed all 5 years of each 5-year period are dry and these multiple dry year scenarios are similarly illustrated in Tables 4.17-8 through 4.17-11. It should be noted that the New Supply Acquisition Program is adjusted from the average years in the single dry year in Table 4.17-7 and in the 5-year drought periods in Tables 4.17-8 through 4.17-11 by multiplying times the SWP reliability percentage and then dividing by the normal year percentage, because the New Supply has already been factored up to account for normal or average year conditions in the SWP.

**TABLE 4.14-8
LACWWD 40 PROJECTED WATER DEMAND AND SUPPLY
MULTIPLE DRY WATER YEARS – 2016 TO 2020 (AFY)**

	2016	2017	2018	2019	2020
Demand					
Existing Demand	58,400	57,000	55,600	54,200	53,000
Projected Demand	13,800	16,100	18,400	20,600	22,900
Subtotal	72,200	73,100	74,000	74,800	75,900
Committed Demand	20,600	20,600	20,600	20,600	20,600
Proposed Project	0	0	244	244	244
Total Demand	92,800	93,700	94,800	95,600	96,700
Existing Water Supply					
Groundwater	23,200	23,200	23,200	23,200	23,200
Imported Water	31,700	31,700	31,700	31,700	31,700
Total Existing Supply	54,900	54,900	54,900	54,900	54,900
Difference (supply minus demand)	(37,900)	(38,800)	(39,900)	(40,700)	(41,800)
Planned Water Supply					
Groundwater Banking	30,600	30,700	31,100	31,100	31,500
New Supply Acquisition Program	1,300	1,500	1,700	1,900	2,100
Recycled Water	6,000	6,600	7,100	7,700	8,200
Total Planned Supply	37,900	38,800	39,900	40,700	41,800
Total Existing and Planned Supply	92,800	93,700	94,800	95,600	96,700
Source: Psomas 2015.					

**TABLE 4.14-9
LACWWD 40 PROJECTED WATER DEMAND AND SUPPLY
MULTIPLE DRY WATER YEARS – 2021 TO 2025 (AFY)**

	2021	2022	2023	2024	2025
Demand					
Existing Demand	53,000	53,000	53,000	53,000	53,000
Projected Demand	25,200	27,500	29,800	32,100	34,400
Subtotal	78,200	80,500	82,800	85,100	87,400
Committed Demand	20,600	20,600	20,600	20,600	20,600
Proposed Project	244	244	244	244	244
Total Demand	99,000	101,300	103,600	105,900	108,200
Existing Water Supply					
Groundwater	23,200	23,200	23,200	23,200	23,200
Imported Water	31,700	31,700	31,700	31,700	31,700
Total Existing Supply	54,900	54,900	54,900	54,900	54,900
Difference (supply minus demand)	(44,100)	(46,400)	(48,700)	(51,000)	(53,300)
Planned Water Supply					
Groundwater Banking	32,400	33,200	34,100	34,900	35,700
New Supply Acquisition Program	3,000	3,900	4,800	5,700	6,700
Recycled Water	8,700	9,300	9,800	10,400	10,900
Total Planned Supply	44,100	46,400	48,700	51,000	53,300
Total Existing and Planned Supply	99,000	101,300	103,600	105,900	108,200
Source: Psomas 2015.					

**TABLE 4.14-10
LACWWD 40 PROJECTED WATER DEMAND AND SUPPLY
MULTIPLE DRY WATER YEARS – 2026 TO 2030 (AFY)**

	2026	2027	2028	2029	2030
Demand					
Existing Demand	53,000	53,000	53,000	53,000	53,000
Projected Demand	36,700	39,000	41,300	43,600	45,800
Subtotal	89,700	92,000	94,300	96,600	98,800
Committed Demand	20,600	20,600	20,600	20,600	20,600
Proposed Project	244	244	244	244	244
Total Demand	110,500	112,800	115,100	117,400	119,600
Existing Water Supply					
Groundwater	23,200	23,200	23,200	23,200	23,200
Imported Water	31,700	31,700	31,700	31,700	31,700
Total Existing Supply	54,900	54,900	54,900	54,900	54,900
Difference (supply minus demand)	(55,600)	(57,900)	(60,200)	(62,500)	(64,700)
Planned Water Supply					
Groundwater Banking	36,500	37,200	38,000	38,600	39,300
New Supply Acquisition Program	7,700	8,700	9,700	10,800	11,800
Recycled Water	11,400	12,000	12,500	13,100	13,600
Total Planned Supply	55,600	57,900	60,200	62,500	64,700
Total Existing and Planned Supply	110,500	112,800	115,100	117,400	119,600
Source: Psomas 2015.					

**TABLE 4.14-11
LACWWD 40 PROJECTED WATER DEMAND AND SUPPLY
MULTIPLE DRY WATER YEARS – 2031 TO 2035 (AFY)**

	2031	2032	2033	2034	2035
Demand					
Existing Demand	53,000	53,000	53,000	53,000	53,000
Projected Demand	48,100	50,400	52,700	55,000	57,200
Subtotal	101,100	103,400	105,700	108,000	110,200
Committed Demand	20,600	20,600	20,600	20,600	20,600
Proposed Project	244	244	244	244	244
Total Demand	121,900	124,200	126,500	128,800	131,000
Existing Water Supply					
Groundwater	23,200	23,200	23,200	23,200	23,200
Imported Water	31,700	31,700	31,700	31,700	31,700
Total Existing Supply	54,900	54,900	54,900	54,900	54,900
Difference (supply minus demand)	(67,000)	(69,300)	(71,600)	(73,900)	(76,100)
Planned Water Supply					
Groundwater Banking	40,100	40,700	41,400	42,000	42,600
New Supply Acquisition Program	12,800	13,900	15,000	16,100	17,200
Recycled Water	14,100	14,700	15,200	15,800	16,300
Total Planned Supply	67,000	69,300	71,600	73,900	76,100
Total Existing and Planned Supply	121,900	124,200	126,500	128,800	131,000
Source: Psomas 2015.					

LACWWD 40's current (calendar year 2014) water demand is approximately 50,477 afy. The 20-year planning period starting in 2015 (utilized to be consistent with the 2010 IRUWMP) for this water supply assessment projects LACWWD 40's water demand by 2035 to be approximately 131,000 afy, including the proposed Project, all committed demand and projected new demand growth. This projection is consistent with the District's 2010 IRUWMP water demand increase projections and appears conservative based on actual demand through 2014. The analysis conservatively assumes that the Projected Demand included in the 2010 IRUWMP did not include any additional demand for the development of the Project. The Project would increase this demand by approximately 244 AFY which is anticipated to come on line in 2018.

Analysis of water supply projections for LACWWD 40 demonstrates that projected and planned new supplies will meet demands through year 2035. These projections consider water development programs and projects as well as water conservation, as described in LACWWD 40's 2010 IRUWMP and Sections 4 and 5 of the water supply assessment.

With these revised water demand and supply projections and implementation of MM UTL-1, the LACWWD 40 would have the water supply needed to serve the Project. MM UTL-1 requires that the County sign the New Water Supply Entitlement Acquisition Agreement with the LACWWD 40 and pay a deposit of \$10,000 per acre-foot of annual water demand from the Project for the acquisition of additional water supplies from Antelope Valley-East Kern Water Agency (AVEK) to serve the Project. With implementation of MM UTL-1, estimates for water supply and demand during each single-dry year and multiple-dry years, as provided in the water supply assessment, show that water supply is available to serve the Project during the average year, single-dry year, and multiple-dry years. The water supply assessment concludes the information on record indicates a sufficient and reliable water supply for LACWWD 40, now and into the future, including a sufficient water supply for the Project. These supplies are also sufficient to provide for overall growth in the LACWWD 40 service area at the rate projected in the 2010 IRUWMP.

It is noted that upon completion of adjudication proceedings, groundwater supply is expected to be available during average, single-dry years, and multiple-dry year drought periods due to the fact that the groundwater basin would have the storage available to withstand swings in precipitation with only nominal changes in groundwater levels.

However, imported water from the SWP could experience large swings in available supply depending on rainfall and snowpack conditions. DWR publishes a detailed report every other year which updates the reliability of the SWP in terms of likelihood of deliveries during average years, single-dry years, and various multiple-dry year drought periods for both existing conditions and projected conditions 20 years into the future. These projections are based on past measured hydrologic events in the SWP service area watershed and complex modeling. Estimates of imported SWP water from AVEK has been adjusted for the average year, single-dry year, and multiple-dry years based on the most current Draft SWP Reliability Report 2013 using the same percent allocations from the IRUWMP.

During the single-dry year and multiple-dry years, groundwater banking programs, the purchase of new imported supplies, water transfers, water conservation, and expansion of recycled water systems are expected to meet the reductions in imported water availability to meet demand. Without these measures, and the financial arrangements that allow for the purchasing of new water supplies, impacts would be significant.

Therefore, in accordance with the LACWWD 40's New Supply Acquisition program and the LACWWD 40's MOU with AVEK to serve the Project, the County would sign a New Water Supply Entitlement Acquisition Agreement with the LACWWD 40 and pay a proposed deposit of \$10,000 per acre-foot of annual water demand from the Project. The LACWWD 40 would then provide

these fees to AVEK to purchase water supply for LACWWD 40 and the Project. Impacts would be less than significant after mitigation.

Threshold 4.14e: Would the project result in a determination by the wastewater treatment provider which serves or may serve the project that it has inadequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

Short-Term Construction Impacts

Wastewater generation during construction would be short-term and in limited quantities. Existing sewer lines connected to the LACSD's Lancaster Water Reclamation Plant would be used during this phase. No new wastewater treatment capacity would be needed. Impacts would be less than significant and no mitigation is required.

Long-Term Operational Impacts

The Avenue "I" West trunk sewer has a design capacity of 53.9 mgd. In 2011, the LACSD measured the actual conveyed flow in this sewer to be 7.4 mgd, leaving excess capacity of 46.5 mgd. The Project's wastewater will be treated at the Lancaster Water Reclamation Plant, which has a design capacity of 18 mgd and currently processes an average flow of 13.4 mgd. There is 46.5 mgd of available capacity at the trunk sewer and 4.6 mgd of available capacity at the treatment plant (LACSD 2014a).

The LACSD estimated the average wastewater flow increase from the Project at 100,800 gpd (which assumes 175 gpd per additional bed) (LACSD 2014a). Under a worst case scenario that considers all 1,604 beds to be new beds, as much as 280,700 gpd of wastewater would be generated by the Project. This is within the 46.5 mgd capacity of the Avenue "I" West trunk sewer and the 4.6 mgd of available capacity at the Lancaster Water Reclamation Plant.

Under both scenarios, there is adequate capacity at the LACSD trunk sewer and treatment plant to serve the Project. Impacts would be less than significant because no new or expanded treatment capacity is required.

Additionally, the LACSD is authorized by the *California Health and Safety Code* to charge a fee for the privilege of connecting (directly or indirectly) to their system or increasing the strength or quantity of wastewater attributable to an operation that is already connected. The collected fees are used to incrementally expand the sewage system to accommodate new development in the LACSD service area. As such, the proposed Project would be subject to payment of the LACSD's connection and service fees, as set forth in RR UTL-1. Compliance with RR UTL-1 would ensure that the Project would pay its fair share of any future wastewater treatment expansion needs. Impacts would be less than significant. No mitigation is required.

Off-Site Impacts

The proposed driveway improvements and water line extension and connection are not expected to generate sewage or wastewater that would require conveyance or treatment at LACSD facilities. No impact on wastewater treatment capacity would occur.

Threshold 4.14f: Would the project be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?

Short-Term Construction Impacts

Construction of the Project would result in the generation of solid wastes, which would consist of green wastes, demolition debris, and construction debris. As discussed in Section 3.0, Project Description, demolition of existing structures, site improvements, and infrastructure would generate solid wastes requiring landfill disposal.

Approximately 5,400 cubic yards (cy) of removed vegetation and approximately 10,184 cy of demolition materials would be generated during demolition activities. Assuming a weight of 0.42 ton per cubic yard of construction debris, demolition activities would generate approximately 6,545.28 tons of solid waste that will need to be disposed of. A portion of this waste stream would potentially be comprised of asbestos-containing materials and lead-based paint, as discussed in Section 4.7, Hazards and Hazardous Materials. Prior to demolition activities, these materials, if determined present, will be managed by qualified personnel and in compliance with State and County requirements. However, the volume of hazardous materials generated as part of demolition activities would be a minimal portion of the total construction waste stream.

In addition to the demolition debris, construction and renovation activities would also generate solid wastes. Using a generation factor for non-residential construction debris of 4.34 pounds per sf (USEPA 1998), the total floor area of 382,831 sf of proposed construction and rehabilitation would generate approximately 830.75 tons of solid waste. Thus, demolition and construction of the Project would generate a total of approximately 7,376.03 tons of solid waste.

Compliance with the County's Green Building Standards Code and Construction and Demolition Debris Recycling and Reuse Ordinance (RR UTL-3) is required. A Recycling and Reuse Plan (RRP) would be prepared that contains the estimated total weight of the Project's construction and demolition (C&D) wastes; vendors for the recycled and reused wastes; and the percentage of wastes diverted away from the landfill. This would reduce this waste weight by at least 65 percent to approximately 2,581.61 tons or 6,146.56 cy. These solid wastes would be generated in the short-term (over 33 months) and could be accommodated by the remaining landfill capacity at the Lancaster Landfill or the Antelope Valley Landfill. The combined estimated remaining capacity at these 2 nearest landfills is approximately 48.1 million cubic yards. Therefore, the Project's estimated construction waste volume would represent approximately 0.13 percent of the remaining capacity of these 2 landfills and are within each landfill's daily capacity limit of 3,564 tons and 5,100 tons, respectively. Therefore, with compliance with RR UTL-3, there would be a less than significant impact on landfill capacity from the short-term construction solid waste disposal needs of the Project, and no mitigation is required.

Long-Term Operational Impacts

The long-term operation of the proposed Project would generate solid wastes that would require disposal at the Lancaster or Antelope Valley Landfills or other landfills serving the County of Los Angeles that can accept waste from the Project site.

Solid waste generation during operation of the Project is estimated at 1,384 tons per year (DLR Group 2015). The proposed Project would operate a number of recycling programs in accordance with County directives (RR UTL-4). This would include the purchase and use of re-refined motor oil in all County motorized vehicles and equipment; the purchase and use of 30 percent recycled-content paper, electronic waste surplus, and used printer cartridges; encouragement of reduced paper-based correspondence; paper and beverage container collection and recycling; purchase

and use of remanufactured laser toner cartridges for black and white printers and copiers; restricted use of styrofoam containers; and prohibited use of plastic carryout bags (County of Los Angeles 2015).

The MLWDC waste handling protocol requires that deputies are responsible for ensuring that the barrack trustees have collected all trash from inside the barracks and all trash from the compound area. The trash is then pre-sorted and separated for recycling as a standard operating procedure, when practical. The Project's barracks/compound trash shall be sorted into recyclable and food waste, and placed into separate blue recycling containers. Therefore, the estimated 1,384 tons per year of solid waste generation by the Project would be reduced through the implementation of various recycling programs.

As discussed above, the combined estimated remaining capacities of the Lancaster Landfill and the Antelope Valley Landfill is approximately 48.1 million cubic yards. With no consideration of the effects of on-site recycling and waste reduction, the Project's daily solid waste generation would represent less than 0.001 percent of the Lancaster Landfill's available daily tonnage of 5,100 tons of solid wastes per day and 0.0011 percent of the Antelope Valley Landfill's available daily tonnage of 3,564 tons of solid wastes per day.

Therefore, the proposed Project would be served by landfills with sufficient permitted capacity to accommodate its estimated long-term solid waste disposal needs. There would be a less than significant impact and no mitigation is required.

Off-Site Impacts

The proposed driveway improvements and water line extension and connection are not expected to generate solid wastes in the long-term that would require landfill capacity. Construction wastes from these off-site improvements would result in minor waste disposal needs. Impacts would be less than significant with compliance with RR UTL-3, and no mitigation is required.

Threshold 4.14g: Would the project comply with federal, state, and local statutes and regulations related to solid waste?

Short-Term Construction Impacts

Construction of the proposed Project would comply with all applicable construction waste regulations, including the County's Green Building Standards Code and Construction and Demolition Debris Recycling and Reuse Ordinance (RR UTL-4) to reduce construction waste volumes by at least 65 percent. Therefore, there would be a less than significant impact related to solid waste regulations and no mitigation is required.

Long-Term Operational Impacts

The proposed Project would implement recycling programs in compliance with County policies (RR UTL-4), which have been adopted to comply with solid waste regulations such as the California Integrated Waste Management Act (AB 939) and the County's SRRE and HHWE under its IWMP. Hazardous wastes would also be disposed of in accordance with existing regulations outlined in Section 4.7, Hazards and Hazardous Materials. Therefore, there would be a less than significant impact related to solid waste regulations and no mitigation is required.

Off-Site Impacts

The proposed driveway improvements and water line extensions and connection would not generate solid wastes in the long-term that would require compliance with solid waste regulations. No impact would occur.

Threshold 4.14h: Would the project require or result in the construction of other infrastructure or expansion of existing facilities, the construction of which could cause significant environmental effects?

Short-Term Construction Impacts

Demand for telecommunication and electrical services during construction of the Project would be limited and would be met by existing Verizon, Time Warner, and SCE lines and facilities serving the MLDC. Impacts would be less than significant and no mitigation is required. No natural gas demand is expected during construction as no natural-gas construction equipment or vehicles are expected to be used. Time Warner has indicated that conflicts during construction would have to be addressed by the Construction Manager. This will be part of the standard construction coordination, which would include all potentially affected utility facilities.

As discussed further below, SCE and SCG have indicated that implementation of the Project would require no off-site additions or expansions of electrical or natural gas infrastructure. Therefore, physical impacts related to the construction of new on-site telecommunication and energy infrastructure are addressed as part of the Project analyzed throughout this EIR. The primary environmental impacts associated with on-site infrastructure installation would be related to air quality and noise, as this component of construction involves mainly grading, excavation, and movement and placement of the infrastructure lines and facilities. As discussed in Section 4.2, Air Quality, Section 4.7, Hazards and Hazardous Materials, Section 4.9, Hydrology and Water Quality, and Section 4.10, Noise, there would be less than significant impacts related to the construction of telecommunication and energy infrastructure and no mitigation would be required.

Long-Term Operational Impacts

Verizon indicated that it appears to have enough capacity to serve the Project, but will require Project plans, a site survey and engineering study, and associated fees to provide a definitive answer. It expects that new cable from one of their many pull box or manhole facilities along the cable entrance path can be pulled to serve the Project. On-site infrastructure (i.e., conduits, pull boxes, manholes) from the main telecommunications room proposed at the New Main Control (Building 51) would have to be provided as part of the Project (Verizon 2015). Time Warner has facilities on the site. Thus, it is expected that these same facilities would be used to serve the Project or new lines provided on site.

Electrical service to the Project would be provided by SCE through connections to existing electrical lines on West Avenue I and 60th Street West. The Project's anticipated electrical power demand would represent less than 0.01 percent of SCE's power supply in 2012 and would not, therefore, create a significant effect on either peak or base load energy demands from SCE such that new or expanded off-site electrical infrastructure is necessary to serve the Project. However, based on consultation with SCE, the Project would include a new transformer (in addition to the existing transformer) and two new diesel generators. Similarly, natural gas service to the Project would be provided by SCG through connections to existing natural gas lines in West Avenue I. The Project's natural gas demand would represent less than 0.01 percent of SCG's storage capacity for its natural gas supplies and would not, therefore, create a significant effect on either

peak or base load energy demand. There would be no requirement for new laterals installed from the lines in West Avenue I, only new or replacement connections to buildings within the Project.). The demand for on-site and transportation energy is analyzed in Section 4.15, Energy, of this EIR.

The impacts associated with the upgrade or replacement of these utility lines within the site has been accounted for in the analysis throughout this Draft EIR. Long-term impacts would be less than significant and no mitigation is required.

Off-Site Impacts

The proposed driveway improvements and water line extension and connection would not generate a demand for phone, cable, or telecommunication services. No impact would occur.

4.14.7 CUMULATIVE IMPACTS

Water Infrastructure and Supply

The development of on-site water infrastructure would have no impacts on properties outside the site. As stated in PDF UTL-2, facilities that are connected to the existing water wells and reservoirs would remain connected after severance from the existing water distribution system with Project implementation. As discussed above, LACWWD 40 has a New Supply Acquisition program that allows for the LACWWD 40 to obtain additional imported water through AVEK. The estimates of water demand and supply detailed above account for projected demand from new development in the Antelope Valley and committed demand from developments that have been approved but not yet constructed. As shown, there would be adequate water supply to serve the Project and cumulative development in the Antelope Valley. Developments would have to construct water system connections on an individual basis to the LACWWD 40's nearest water line. Impacts would be less than significant.

Wastewater Infrastructure and Treatment

Future development projects would generate additional sewage volume requiring treatment and disposal. Coordination with LACSD No. 14 and with payment of service and facilities fees, where applicable, for private development projects would be needed to ensure sewer service to future developments in the Antelope Valley. When required, the fees would be used to fund operation and maintenance of the Lancaster Water Reclamation Plant and trunk sewer and to expand the needed facilities. Existing sewer infrastructure and treatment plant capacity are available to serve the Project and future developments. There is 46.5 mgd of available capacity at the West Avenue I trunk sewer and 4.6 mgd of available capacity at the Lancaster Water Reclamation Plant, with expansions to the Plant planned under its 2020 Facilities Plan. No long-term impacts to sewer service and facilities would occur; thus, no significant adverse cumulative impacts are anticipated from the Project or cumulative projects.

Storm Drainage Infrastructure

The development of on-site storm drain infrastructure would have no impacts on properties outside the site, with compliance with the County's NPDES Municipal Separate Storm Sewer System (MS4) permit, which requires that no hydrologic conditions of concern be created by new development or major redevelopment. This requirement would ensure that no increase in storm water volume or flow rates is generated by individual developments through the implementation of BMPs for on-site retention, detention, ground percolation, harvest and reuse, or other similar measures, as discussed further in Section 4.8, Hydrology and Water Quality. Thus, there would be no cumulatively considerable impacts associated with storm drain infrastructure.

Solid Waste Disposal and Regulation

The cumulative projects and the Project would generate solid wastes that would require waste collection and disposal services. There are sufficient capacities at the Antelope Valley Landfill and the Lancaster Landfill to serve future developments in the Antelope Valley. Recycling and waste reduction measures will be implemented by individual developments, such as household recycling bins, household hazardous waste and electronic waste collections, tire recycling, plastic and paper carryout bag ordinance, and construction and demolition waste recycling (RR UTL-3 and RR UTL-4). These programs would reduce solid waste volume and the demand for landfill capacity. No significant cumulative impacts would occur.

Telecommunication and Energy Services

Telecommunication and energy services are provided on-demand, based on the regulations of the California Public Utilities Commission. As discussed above, the utilities serving the site have determined the Project can be served with existing infrastructure, in addition to existing demands their respective service areas. Cumulative impacts would be less than significant and no mitigation is required.

4.14.8 MITIGATION MEASURES

MM UTL-1 The County shall enter the New Water Supply Entitlement Acquisition program established by the County Waterworks District No. 40 (LACWWD No. 40) and pay a one-time deposit of \$10,000 per acre-foot of annual water demand from the Project for the acquisition of additional water supplies from Antelope Valley-East Kern Water Agency (AVEK) to serve the Project, pursuant to the August 13, 2013 Memorandum of Understanding between LACWWD No. 40 and AVEK.

4.14.9 LEVEL OF SIGNIFICANCE AFTER MITIGATION

With implementation of the PDFs, RRs, and MM UTL-1 for impacts to water supply, the Project would result in less than significant impacts related utilities and service systems.

4.14.10 REFERENCES

Antelope Valley Air Quality Management District (AVAQMD). 1976a (April, adopted). Rule 402: Nuisance. Lancaster, CA: AVAQMD. <http://www.avaqmd.ca.gov/Modules/ShowDocument.aspx?documentid=866>.

———. 1976b (as amended through 2010). Rule 403: Fugitive Dust. Lancaster, CA: AVAQMD. <http://www.avaqmd.ca.gov/Modules/ShowDocument.aspx?documentid=867>.

Antelope Valley Integrated Regional Water Management (AVIRWM) Group. 2013. *2013 Antelope Valley Integrated Regional Water Management Plan Update*. <http://www.avwaterplan.org/>.

Antelope Valley-East Kern Water Agency (AVEK). 2010. *2010 Urban Water Management Plan*. Palmdale, CA :AVEK. http://www.avek.org/index.cfm?fuseaction=menu&menu_id=5012.

California Building Standards Commission (CBSC). 2015 (accessed February 6). *Adopted 2013 Code, Triennial California Building Standards Commission (CBSC). Adopted 2013 Code, Triennial Edition*. Sacramento, CA: CBSC. <http://www.bsc.ca.gov/>.

- . 2014 (July). *California 2013 Green Building Standards Code, CALGreen, California Code of Regulations Title 24, Part 11*. Sacramento, CA: CBSC. http://www.ecodes.biz/ecodes_support/Free_Resources/2013California/13Green/13Green_main.html.
- California Department of Resources Recycling and Recovery (CalRecycle). 2013 (February 19). Solid Waste Facility Permit – Lancaster Landfill and Recycling Center. Sacramento, CA: CalRecycle.
- . 2011 (November 7). Solid Waste Facility Permit – Antelope Valley Public Landfill. Sacramento, CA: CalRecycle.
- DLR Group. 2015. *Mira Loma Detention Center Women's Facility Project – Operations and Maintenance Data*. Santa Monica, CA: DLR Group.
- Lancaster, City of. 2015 (May, last updated). *Lancaster, California – Code of Ordinances*. Tallahassee, FL: Municode Corporation for the City. https://www.municode.com/library/ca/lancaster/codes/code_of_ordinances?nodeId=16042.
- . 2005. Overview Map of District Sewers in Lancaster. Lancaster, CA: the City.
- Los Angeles, County of. 2015. *Los Angeles, California County Code*. Tallahassee, FL: Municipal Code Corporation for the County of Los Angeles. http://www.municode.com/library/CA/Los_Angeles_County.
- . 2014. MLDF-Water Usage 2009–2012. Los Angeles, CA: the County.
- Los Angeles, County of, Department of Public Works (LACDPW). 2015 (February 12, access date). County of Los Angeles Departmental Recycling Program – County Policy. Los Angeles, CA: County of. <https://dpw.lacounty.gov/epd/drp/CountyPolicy.cfm>.
- . 2013 (August). *County of Los Angeles Countywide Integrated Waste Management Plan 2012 Annual Report*. Los Angeles, CA: LACDPW.
- . 1997 (June). *Los Angeles County Integrated Waste Management Summary Plan Executive Summary*. Alhambra, CA: LACDPW. <http://dpw.lacounty.gov/epd/swims/ShowDoc.aspx?id=93&hp=yes&type=PDF>.
- Los Angeles County Department of Public Works, Waterworks District 40 (LACWWD 40) and Quartz Hill Water District (QHWD). 2011 (June). *2010 Integrated Regional Urban Water Management Plan for the Antelope Valley*. Alhambra, CA: LACWWD. <http://dpw.lacounty.gov/wwd/web/Documents/2010%20Integrated%20Urban%20Water%20Management%20Plan%20for%20the%20Antelope%20Valley.pdf>.
- Psomas. 2015 (May). *Mira Loma Detention Center Women's Facility Water Supply Assessment*. Santa Ana, CA: Psomas.
- . 2013 (September 3). Report on Evaluation of Two Existing Wells at the Mira Loma Detention Facility, Lancaster, California. Los Angeles, CA: Psomas.
- Regional Water Management Group (RWMG). 2013. *Antelope Valley Integrated Regional Water Management Plan – Final, 2013 Update*. Lancaster, CA: RWMG.

- Remy Moose Manley, LLP (RMM). 2011 (Copyright). *Vineyard Area Citizens for Responsible Growth v. City of Rancho Cordova*. Sacramento, CA: RMM. <http://www.rmmenvirolaw.com/2012/01/vineyard-area-citizens-for-responsible-growth-v-city-of-rancho-cordova/>.
- Sanitation Districts of Los Angeles County (LACSD). 2014a (October 6). Personal communication. Letter from A. Raza, Customer Service Specialist (LACSD) to M. Diaz (County of Los Angeles Chief Executive Office) regarding the Mira Loma Detention Center Women's Facility Project.
- . 2014b (December 4, date accessed). Lancaster Water Reclamation Plant. Whittier, CA: LACSD. http://lacsd.org/wastewater/wwfacilities/antelope_valley_water_reclamation_plants/lancaster_wrp.asp.
- . 2014c (December 5, date accessed). About the Industrial Waste Section. Whittier, CA: LACSD. http://lacsd.org/wastewater/industrial_waste/default.asp.
- . 2004 (May). *Final Lancaster Water Reclamation Plant 2020 Facilities Plan*. Whittier, CA: LACSD.
- . 1998 (July, last amended). Wastewater Ordinance. Whittier, CA: LACSD. http://lacsd.org/wastewater/industrial_waste/iwordinances/wastewater_ordinance.asp.
- Southern California Gas Company (SCG). 2014 (November 21). Personal communication. Letter from T. Bruce, Planning Associate (SCG) to [D. Sarraf, Environmental Planner (BonTerra Psomas) regarding Natural Gas Service for the Mira Loma Detention Center Women's Facility Project.
- Superior Court of California. 2008 (November 6). Order After Phase Two Trial on the Hydrologic Nature of Antelope Valley – JCCP 4408. Los Angeles, CA: Superior Court of California.
- Time Warner. 2015 (February 13). Personal communication. Letter from R. Reihls, Construction Manager (Time Warner) to D. Sarraf, Environmental Planner (BonTerra Psomas).
- U.S. Environmental Protection Agency (USEPA). 1998 (June). *Characterization of Building-related Construction and Demolition Debris in the United States* (prepared by Franklin Associates). Washington, D.C.: USEPA, Municipal and Industrial Solid Waste Division.
- VCA Engineers. 2014 (August 13). *County of Los Angeles Mira Loma Detention Center, 45100 60th Street West, Lancaster, CA 93536 Preliminary Site Water Supply and Distribution Analysis Narrative*. Los Angeles, CA: VCA Engineers.
- Verizon. 2015 (January 7). Personal communication. Letter from R. Graves, Engineer IV (Verizon) to D. Sarraf, Environmental Planner (BonTerra Psomas).
- Waste Management (WM). 2014. Find a facility near you. Houston, TX: WM. <http://www.wm.com/find-a-facility.jsp/?address=Lancaster%2C%20CA%2C%20United%20States%20usa&radius=80500acdpw>.

This page intentionally left blank

4.15 ENERGY

This section evaluates the potential for energy-related impacts associated with the Project and ways in which the Project would reduce unnecessary energy consumption, consistent with the suggestions contained in Appendix F of the CEQA Guidelines. Energy service providers to the site include Southern California Edison Company (SCE) for electrical service and Southern California Gas Company (SCG) for natural gas. Information for this EIR section was derived from responses to the Notice of Preparation (Appendix A); consultation with the various utility providers (Appendix G) and the websites of these providers.

4.15.1 RELEVANT PROGRAMS AND REGULATIONS

This section includes relevant federal, State, and local programs and regulations that apply to Energy. In addition to those discussed below, the following relevant programs and regulations from Section 4.6, Greenhouse Gas Emissions, are applicable to the Energy discussion: Light-Duty Vehicle Greenhouse Gas Emissions Standards and Corporate Average Fuel Economy Standards; the California Air Resources Board (CARB) Scoping Plan; the California Code of Regulations (Title 24, Part 6, Energy Efficiency Standards and Title 24, Part 11, Green Building Standards); the Countywide Energy and Environmental Policy; the Los Angeles County Green Building Standards Code (Title 31); and Title 22 of the Los Angeles County Code (Green Building Ordinance).

Federal

Energy Independence and Security Act of 2007

The Energy Independence and Security Act of 2007 (Public Law 110-140) seeks to provide the nation with greater energy independence and security by increasing the production of clean renewable fuels; improving vehicle fuel economy; and increasing the efficiency of products, buildings, and vehicles. It also seeks to improve the energy performance of the federal government. The Act sets increased Corporate Average Fuel Economy Standards; the Renewable Fuel Standard; appliance energy efficiency standards; building energy efficiency standards; and accelerated research and development tasks on renewable energy sources (e.g., solar energy, geothermal energy, and marine and hydrokinetic renewable energy technologies), carbon capture, and sequestration.

State

Renewables Portfolio Standard

The California Renewables Portfolio Standard (RPS) was established in 2002 under Senate Bill 1078 and was amended in 2006 and 2011. The RPS program requires investor-owned utilities, electric service providers, and community choice aggregators to increase the use of eligible renewable energy resources to 33 percent of total procurement by 2020. The California Public Utilities Commission is required to provide quarterly progress reports on progress toward RPS goals. This has accelerated the development of renewable energy projects throughout the State, including the Antelope Valley area. Based on the 3rd quarter 2014 report, the three largest retail energy utilities provided an average of 20.9 percent of its supplies from renewable energy sources. Since 2003, 8,248 megawatts (MW) of renewable energy projects have started operations (CPUC 2014).

State Alternative Fuels Plan

Assembly Bill (AB) 1007 requires the California Energy Commission (CEC) to prepare a plan to increase the use of alternative fuels in California. The State Alternative Fuels Plan was prepared by the CEC with CARB and in consultation with other federal, State, and local agencies to reduce petroleum consumption; increase use of alternative fuels (e.g., ethanol, natural gas, liquefied petroleum gas, electricity, and hydrogen); reduce greenhouse gas (GHG) emissions; and increase in-state production of biofuels. The State Alternative Fuels Plan recommends a strategy that combines private capital investment, financial incentives, and advanced technology that will increase the use of alternative fuels; result in significant improvements in the energy efficiency of vehicles; and reduce trips and vehicle miles traveled through changes in travel habits and land management policies. The Alternative Fuels and Vehicle Technologies Funding Program legislation (AB 118, Statutes of 2007) proactively implements this plan (CEC 2007).

Appliance Efficiency Regulations

California's Appliance Efficiency Regulations (California Code of Regulations [CCR], Title 20, Parts 1600–1608) contain energy performance, energy design, water performance, and water design standards for appliances (including refrigerators, wine chillers, ice makers, vending machines, freezers, water heaters, fans, boilers, washing machines, dryers, air conditioners, pool equipment, and plumbing fittings) that are sold or offered for sale in California. These standards are updated regularly to allow consideration of new energy efficiency technologies and methods.

County

Renewable Energy Ordinance

The County is in the process of adopting a Renewable Energy Ordinance to establish regulations for the development of small-scale renewable energy systems (solar and wind energy facilities) for on-site or off-site use. The ordinance is currently going through the environmental review process (County of Los Angeles 2015).

Countywide Energy and Environmental Policy

The Countywide Energy and Environmental Policy (Policy) was adopted by the Los Angeles County Board of Supervisors on January 16, 2007, to provide guidelines for the development and enhancement of energy conservation and environmental programs within County departments. The Policy was also the County's response for the need for energy conservation and reduction in GHG emissions. It directs the County to track its GHG emissions with the California Climate Action Registry, and to reduce its facilities' energy consumption by 20 percent by the year 2015.

In addition, the County has implemented various internal programs on energy conservation; water conservation; waste reduction and recycling; green purchasing and contracting; and alternative fuel vehicle purchasing. On January 13, 2009, the County created an action plan for developing a Comprehensive Renewable Energy Program to develop renewable energy projects on existing County facilities and properties.

4.15.2 EXISTING CONDITIONS

The Project area is served by SCE for electrical power services and SCG for natural gas services. The utility infrastructure on the site includes electrical power and natural gas distribution systems consisting of overhead and underground lines. Electrical power comes from the SCE lines on West Avenue I and 60th Street West. There is a substation at the northern edge of the Project site

(north of the Kitchen/Dining Building) connecting to four unit-substations at scattered locations on site. An emergency generator is also present at one unit-substation, which also includes an underground fuel tank near the generator.

SCG has indicated that there are high-pressure main gas lines in public streets in the area that may serve the Project (SCG 2014). A gas meter at the northern end of the Project site taps an existing SCG gas line on West Avenue I and is connected to underground lines that run throughout the site. There is an on-site Central Plant that serves (1) the Kitchen/Dining Building and Buildings E and F on the Project site and (2) the former High Desert Health System Multi-Ambulatory Care Center (HDHS MACC) and Buildings A, B, C, and D outside the Project site. The Central Plant provides chilled water and steam to these buildings through an underground utility tunnel, which has at-grade steam venting structures at various points along its length.

The Mira Loma Detention Center (MLDC) is currently designed to accommodate 1,040 inmates, although the facility has not been occupied by inmates since November 2012. Electrical energy and natural gas usage at the Project site has been substantially reduced in accordance with the lack of inmates and reduced operations at the Project site. Transportation energy use at the site is limited to vehicle trips by Los Angeles County Sheriff's Department staff to provide daily security at the MLDC.

4.15.3 THRESHOLDS OF SIGNIFICANCE

Section 21100(b)(3) of California Environmental Quality Act (CEQA) requires that EIRs include a discussion of the potential energy impacts of proposed projects, with particular emphasis on avoiding or reducing any inefficient, wasteful, and unnecessary consumption of energy. The Environmental Checklist in Appendix G of the State CEQA Guidelines does not contain specific thresholds for energy use or energy efficiency. However, Appendix F of the State CEQA Guidelines states that the means to achieve the goal of conserving energy imply the wise and efficient use of energy and include (1) decreasing overall per capita energy consumption; (2) decreasing reliance on fossil fuels such as coal, natural gas and oil; and (3) increasing reliance on renewable energy sources. It outlines EIR contents that can be used for analyzing the significant energy implications of a project, including topics to include in the project description, environmental setting, environmental impacts, mitigation measures, alternatives, and other issues related to energy. In accordance with Appendix F, titled "Energy Conservation", a project's impacts on Energy may include:

- Energy requirements and energy use efficiencies by amount and fuel type for each stage of the project, including construction, operation, maintenance, and/or removal.
- Effects on local and regional energy supplies and requirements for additional capacity.
- Effects on peak and base period demands for electricity and other forms of energy.
- Degree to which the project complies with existing energy standards.
- Effects on energy resources.
- Transportation energy use requirements and overall use of efficient transportation alternatives.

Thus, potential impacts on Energy would occur if a project would:

Threshold 4.15a: Result in a substantial demand for energy that requires expanded supplies or the construction of new infrastructure or expansion of existing facilities, the construction of which could cause significant environmental effects.

Threshold 4.15b: Result in an inefficient, wasteful and unnecessary consumption of energy.

4.15.4 PROJECT DESIGN FEATURES

PDFs GHG-1, GHG-2, GHG-3 and GHG-4 from Section 4.6, Greenhouse Gas Emissions, also apply to the Energy analysis.

4.15.5 REGULATORY REQUIREMENTS

The following Regulatory Requirements also apply to the Energy analysis: RR AIR-2 from Section 4.2, Air Quality; RR GHG-1 through RR GHG-4 from Section 4.6, Greenhouse Gas Emissions; and RR UTL-1 from Section 4.14, Utilities and Service Systems.

4.15.6 ENVIRONMENTAL IMPACT ANALYSIS

Threshold 4.15a: Would the project result in a substantial demand for energy that requires expanded supplies or the construction of other infrastructure or expansion of existing facilities, the construction of which could cause significant environmental effects?

Short-Term Construction Impacts

Construction of the Project would create temporary increased demands for electricity and vehicle fuels compared to existing conditions and would result in short-term transportation energy use.

Electrical power use to run equipment during construction would be required. Although the majority of construction equipment during demolition and grading activities would be gas-powered or diesel-powered, later construction activities (including interior construction and renovation, as well as architectural coatings) would require electricity. The electrical usage during construction would fluctuate as the construction activities change and the Project progresses towards completion. The site is currently served by on-site electrical infrastructure, which would be used during construction activities. The demand for electricity during construction would not require the development of new or expanded electrical infrastructure and impacts on energy resources would be less than significant.

No natural gas demand is expected during construction as no natural-gas construction equipment or vehicles are expected to be used.

Transportation energy use depends on the type and number of trips; vehicle miles traveled; fuel efficiency of vehicles; and travel mode. Transportation energy use during construction would come from the transport and use of construction equipment, delivery vehicles and haul trucks, and construction employee vehicles that would use diesel fuel and/or gasoline. The use of energy resources by these vehicles would fluctuate according to the phase of construction and would be temporary (i.e., for approximately 35 months).

Because the Project involves the redevelopment of an existing facility, rather than the construction of a new facility, it is reusing and recycling existing structures and materials, which would reduce the amount of energy required during facility construction. As discussed in Section 4.2, Air Quality, pursuant to the California Code of Regulations (specifically, Title 13, Section 2485; see RR AIR-2), all diesel-fueled commercial motor vehicles must not idle for more than 5 consecutive minutes at any location. Implementation of RR AIR-2 would reduce fuel use by construction vehicles. As discussed in Section 4.14, Utilities and Service Systems, RR UTL-3 requires the recycling/reuse of at least 65 percent of non-hazardous construction/demolition debris by weight or volume, in

accordance with the County's Green Building Standards Code and Construction and Demolition Debris Recycling and Reuse Ordinance. This RR would indirectly reduce energy use from the production of building materials.

Additionally, per PDF GHG-1, the Project's power demand would be off-set by up to one MW of electricity generated by the County's adjacent solar energy facility. This renewable energy source will be available to the Project site throughout construction and long-term operations. Impacts related to energy use during construction would be temporary and would not require expanded energy supplies or the construction of new infrastructure. There would be less than significant impacts and no mitigation is required.

Long-Term Operational Impacts

Operation of the Project would create additional demands for electricity and natural gas compared to existing conditions, and would result in increased transportation energy use. Operational use of energy would include heating, cooling, and ventilation of buildings; water heating; operation of electrical systems, security and control center functions, use of on-site equipment and appliances; and indoor, outdoor, perimeter, and parking lot lighting.

The DLR Group estimates that the Project would use 5.495 million kilowatt-hours (kWh) of electrical power per year for long-term operation (DLR 2015). SCE delivered 15 billion kWh of renewable energy and 60 billion kWh of other electrical power to customers in 2012 (SCE 2015). The Project's electrical power demand would represent less than 0.01 percent of SCE's power supply in 2012 and would not, therefore, create a significant effect on either peak or base load energy demands from SCE. Electrical service to the Project would be provided by SCE through connections to existing off-site electrical lines located adjacent to the Project site on West Avenue I and 60th Street West, and no new off-site infrastructure improvements are required.

The DLR Group estimates that the Project would use 7,200 million British Thermal Units (BTU) of natural gas per year (DLR 2015). SCG has 136 billion cubic feet (Bcf) of storage capacity, with 83 Bcf used for existing core customers, 4 Bcf for system balancing, and the remaining 49 Bcf available for other [new] customers (SCG 2015). The Project's natural gas demand is equal to 7.2 million BTU or less than 0.01 percent of SCG's storage capacity for its natural gas supplies and would not, therefore, create a significant effect on either peak or base load energy demand. Natural gas service to the Project would be provided by SCG through connections to existing natural gas lines in West Avenue I. SCG has indicated that it does not anticipate any Project-related or cumulative impacts on natural gas provisions or gas facilities in the service area (SCG 2014).

Under PDF GHG-1, the Project's power demand would be off-set by up to one MW of electricity generated by the County's adjacent solar energy facility. This renewable energy source will be available to the Project throughout construction and long-term operations. RR GHG-1 would require incorporation of energy conservation measures into the Project to achieve the equivalency of LEED certification. RR GHG-2 requires compliance with the energy efficiency measures in Title 24. In addition, RR GHG-3 requires compliance with Title 31 of the County Code (County Green Building Standards Code) for water and energy conservation and waste reduction. Implementation of PDF GHG-1 and compliance with RRs GHG-1 through GHG-3 would reduce demand for energy from SCE and SCG.

While additional energy supplies are needed from SCE and SCG, the Project's electrical and natural gas demands would represent minor amounts of each utility company's total supplies; the Project would not require the development of new energy sources, nor would it create a need to upgrade existing facilities or infrastructure line capacities to serve the Project. The physical

impacts resulting from the installation of on-site electrical power and natural gas lines would be within the defined Project impact area, and are evaluated throughout this EIR as part of the proposed Project.

Transportation energy use during Project operations would come from the use of motor vehicles for staff vehicle trips; inmate transport to and from the Inmate Reception Center (IRC); delivery/supply trucks; inmate visitors (e.g., lawyers, family members, and friends); volunteers; and trips by maintenance and repair crews. The Traffic Impact Study estimates that the Project would generate approximately 1,038 trips on weekdays and 1,486 trips during the weekends and holidays.

The transportation energy use from these vehicle trips would depend on the efficiency of the motor vehicles in use, including the average miles per gallon achieved by a particular type of vehicle. However, the types of vehicles and their associated fuel economy that would be used by staff, visitors, and others that would come to and from the Project cannot be readily known and thus, estimates of transportation energy use focus on the overall vehicle miles travelled (VMT) and related transportation energy use.

Rough estimates of energy use during Project operations are provided in Table 4.15-1, Estimated Annual Energy Use. Electrical and natural gas consumption are based on DLR Group estimates. Transportation energy use assumes a total of 336,530 staff vehicle trips per year (at 922 trips per day), 28,543 visitor trips per year (39 percent of available appointment slots), 13,000 truck deliveries per year (at 100 trips per weekday), and 2,080 inmate transport trips per year (at 8 trips per weekday). Data from the CalEEMod that is used in air quality and greenhouse gas modelling shows a total of 6.83 million VMT would be generated by the Project. The total estimated annual energy use, including on-site electricity and natural gas and off-site vehicle trips, would be approximately 60.91 billion BTU.

**TABLE 4.15-1
ESTIMATED ANNUAL ENERGY USE**

	Energy Consumption	Energy Use
On-site electric power use	5.495 million kilowatt-hours/year	18.75 billion BTU ^a
On-site natural gas use	7,200 million BTU per year	7.20 billion BTU
Gasoline fuel for 6.15 million VMT	Average of 24.9 miles per gallon ^b = 246,973 gallons per year	30.4 billion BTU ^c
Diesel fuel for 0.68 VMT	Average of 17.7 miles per gallon ^b = 38,604 gallons per year	4.56 billion BTU ^d
	Total	60.91 billion BTU
BTU: British thermal units Notes: Energy use figures are rough estimates and actual energy use may vary. Gasoline use is based on average daily trips. ^a assumes 1 kilowatt-hour = 3,412 BTU ^b average fuel economy in 2012, based on ORNL 2014. ^c assumes 4,949 BTU per vehicle mile for cars ^d assumes 6,674 BTU per vehicle mile for light trucks Source: DLR 2015; LLG 2015; LASD 2015		

As a point of reference for the magnitude of energy use shown in Table 4.15-1, the U.S. Energy Information Administration (EIA) determined that in 2003, "Public Order and Safety" buildings used approximately 114,000 BTU per square foot of development, considering only energy consumption at the point of entry to the building and not considering vehicle fuels (USEIA 2009). The proposed Project would require approximately 67,784 BTU per square foot of building space (i.e., [18.75 billion BTU + 7.2 billion BTU] / 382,831 square feet).

Review of the inmates' residential zip code data shows that there will be an increase in VMT with the relocation of 1,604 female inmates from Century Regional Detention Facility (CRDF) to the Project site. Currently, approximately 2,200 female inmates are located at CRDF. With the Project, approximately 1,604 inmates would be transferred to the MLWDC, while the remaining approximately 700 female inmates, who are considered high-risk due to their medical treatment protocol or housing criteria (e.g., their security classification and/or because they require more intensive medical or mental health supervision) would remain at the Twin Towers Correctional Facility (TTCF); or would be housed at the proposed Consolidated Correctional Treatment Facility (CCTF), which is proposed to focus medical, mental health and substance abuse treatment for incarcerated male and female inmates; or would be housed at other jail facilities that have appropriate services to meet their needs.

In order to estimate the number of visitors that could travel to the MLWDC for visitation, data from the CRDF, which currently houses female inmates, was used. In 2014, the CRDF had 37,106 booked appointments for visitors. There are eight 1-hour visitation appointments available during each weekend day (i.e., Saturday and Sunday) and during holidays, or sixteen 0.5-hour appointments. The CRDF has 52 visitation booths, with a maximum of 3 people per visitation appointment, which equates to 94,848 maximum possible appointment times. Only 37,106 appointment times resulted in visitation (i.e., 39 percent) but it is not known how many visitors arrived for each appointment. Assuming each appointment only required 1 vehicle trip (which is reasonable considering the likelihood of visitors coming from the same household, carpooling, and/or using public transportation), then it can be assumed that approximately 37,106 visitation vehicular round-trips occurred at CRDF in 2014.

The MLWDC would contain as many as 40 visitation booths, with 16 possible appointments per weekend day (considering 104 weekend days and 10 holidays per year), which equates to 72,960 maximum possible appointment times over the course of the year. Assuming a rate of 39 percent actual appointments, 28,543 annual appointments could be expected at the MLWDC. Again, assuming each appointment only requires 1 vehicle trip, then it can be assumed that 28,543 visitation vehicular round-trips would occur annually at the MLWDC.

Therefore, although the MLWDC would generate approximately 23 percent fewer visitor vehicular trips than the CRDF due to a smaller inmate population at the Project and accordingly fewer visitation booths, many of these vehicles are likely to travel a farther distance due to the MLWDC's location in the Antelope Valley, thereby increasing VMT. If the existing geographic distribution of inmate origins remains fairly comparable to what occurs today, inmate visitation trip lengths to the Project site will increase. Based on an extensive review of existing inmate zip code origin data, it was determined that the average visitation trip length is approximately 25 miles per one-way trip to the CRDF facility in Lynwood and would be expected to increase to 74 miles per one-way trip to the Project site. At 28,543 visitation trips and 49 additional miles per trip, this is equal to almost 1,398,607 VMT. However, if all appointment slots are filled, the increase would be as much as 2,793,000 VMT.

Thus, the Project is expected to result in an increase in fuel consumption and transportation energy use due to the increase in VMT for visitor trips. Assuming the projected visitor trips would be using gasoline vehicles (with an average fuel efficiency of 24.9 miles per gallon), this is an

increase in gasoline use by an estimated 56,169 gallons, equivalent to an increase in energy use by 6.9 billion BTU over the existing condition. If all appointment slots are filled, the increase in gasoline use would be approximately 112,169 gallons, equivalent to an increase in energy use by 13.8 billion BTU.

In addition, increases in VMT due to miscellaneous service and delivery trips is estimated in the Traffic Impact Study at 1,200 VMT per weekend day and would be 2,500 VMT per weekday. This would equate to a total increase of 786,800 VMT per year. Assuming 1/3 of these vehicles use gasoline and 1/3 use diesel fuel, increases in fuel use would be approximately 35,967 gallons and increase in energy use by 4.36 billion BTU.

Although these would represent an increase in overall gasoline and diesel fuel consumption due to increased VMT, the Project would not result in a substantial demand for energy that would require expanded supplies or the construction of other infrastructure or expansion of existing facilities.

However, it is possible that increased VMT could become a discouraging factor for some visitors, when considering increased distance, time, and travel costs between the CRDF and the MLWDC. In order to facilitate non-travel opportunities for visitation at the MLWDC, the Project would include a substantial increase in the opportunities for video visitation. A combined minimum of 34 video visiting stations (as opposed to the CRDF's current total of 2 video visiting stations) would be provided in Building 2 and within in each of the barracks, along with video interview rooms in transitional housing buildings, as stated in PDF GHG-2. It is anticipated that video visiting would initially be allowed only between the MLWDC and other County facilities, such as the Men's Central Jail, Twin Towers Correctional Facility, Century Regional Detention Center, and Pitchess Detention Center, and at various Sheriff's stations. However, future expansion of this system would allow video visitation from home or the office. Also, video visitation would provide weekday appointment slots. The substantial increase in opportunities for qualifying inmates to participate in video visiting at the MLWDC would provide more options for visitation without the visitor physically coming to the MLWDC but going to any of the County detention facilities that are nearer to their place of residence, and could result in more frequent visitation without increasing VMT.

As presented in Section 4.6, Greenhouse Gas Emissions, two other PDFs would be incorporated into the Project to encourage and support the use of alternative forms of transportation to and from the Project site in order to reduce VMT. PDF GHG-3 would encourage the use of public transportation, especially AVTA Route 7, which passes along the site boundaries, and Metrolink trains, by posting the AVTA bus transit and Metrolink schedules, as well as the nearest Park and Ride lots, at areas visible to visitors and at the staff services building. PDF GHG-4 would encourage bicycling by providing bicycle storage areas for staff and bicycle racks for visitors. Any resulting reductions in vehicle use and VMT would lead to reduced transportation energy use. RR GHG-4 requires the Project to have an Employee Commute Reduction Plan (ECRP), commonly known as the Rideshare Plan, in accordance with Los Angeles County Code Chapter 5.9, Vehicle Trip Reduction. Implementation of the ECRP could further reduce vehicle trips by increasing average vehicle ridership from the Project.

Impacts would be less than significant and no mitigation is required.

Off-Site Impacts

Proposed off-site infrastructure improvements would have minor energy demands from the use of construction equipment and construction trips, and would have no energy demands (i.e., no off-site land uses) for long-term operation. Impacts would be less than significant and no mitigation is required.

Threshold 4.14b: Would the project result in inefficient, wasteful and unnecessary consumption of energy?

Short-Term Construction Impacts

Construction energy use could be considered wasteful, inefficient, or unnecessary if construction equipment is old or not well maintained, such that its energy efficiency is lower than newer equipment; if equipment is left or to idle even when not in use; if construction trips utilize longer routes than necessary; or if excess electricity and water (which would indirectly require the use of energy for the extraction, treatment and conveyance of water) is used during construction activities. As discussed in Section 4.2, Air Quality, RR AIR-2 requires that diesel-fueled commercial motor vehicles must not idle for more than five consecutive minutes at any location.

Construction traffic is expected to use West Avenue I to access State Route (SR) 14, which is the most direct and shortest route from the site to the regional freeway system. Electrical energy would be available for use during construction from existing power lines and SCE connection, avoiding the use of generators that are less efficient than tying into SCE infrastructure.

Recycling of construction and demolition wastes (see RR UTL-3) would indirectly reduce energy use by future construction projects. In addition, the proposed reuse of the MLDC would avoid the need for new construction and the associated energy use for all new buildings and site improvements.

Thus, energy use during construction of the Project would not be considered inefficient, wasteful, or unnecessary. Impacts would be less than significant and no mitigation is required.

Long-Term Operational Impacts

Long-term energy use would be considered wasteful if alternative energy sources are not used when they are feasible/available, and would be considered inefficient if construction techniques and materials are not compliant with building code requirements for energy efficiency. As shown in Table 4.15-1 above, the Project would use an estimated 5.5 million kilowatt-hours (kWh) of electrical power per year and an estimated 7,200 million BTU of natural gas per year. A portion of this energy demand would be met by the County's solar energy facility to the east of the site (PDF GHG-1).

The regulations, plans, and polices adopted for the purpose of maximizing energy efficiency that are directly applicable to the Project include (1) Countywide Energy and Environmental Policy to achieve the equivalency of a Leadership in Energy and Environmental Design (LEED™) certification for buildings that are 10,000 square feet (sf) or larger (RR GHG-1); (2) California's Title 24 Energy Efficiency Standards for Residential and Nonresidential Buildings (RR GHG-2); (3) Title 24 California Green Building Standards Code (CALGreen Code); and Title 31 of the County Code (the Los Angeles County Green Building Standards Code) (RR GHG-3). The Project would be consistent with the requirements of these energy-related regulations, as per RRs GHG-1, GHG-2, and GHG-3, as discussed in Section 4.6, Greenhouse Gas Emissions. Compliance with RR UTL-4 on the implementation of various waste reduction and recycling measures (e.g., the purchase and use of re-refined motor oil in all County motorized vehicles and equipment; the purchase and use of 30 percent recycled-content paper, electronic waste surplus, and used printer cartridges; reduced paper-based correspondence; and paper and beverage container collection and recycling) as part of County operations would also indirectly reduce energy demands. As such, electrical and natural gas demands from the Project would not be considered inefficient, wasteful, or unnecessary.

Transportation energy use is estimated above in Table 4.15-1. The vehicular energy (i.e., gasoline and diesel fuel) required to operate the proposed MLWDC (including the transport of inmates to and from the IRC, delivery and service vehicles, staff vehicles, and visitor vehicles) would not be considered wasteful, inefficient, or unnecessary. PDF GHG-2 would promote off-site video visitation and reduced vehicle travel; PDF GHG-3 would promote the use of public transportation; and PDF GHG-4 would promote the use of bicycles. RR GHG-4 would increase average vehicle ridership through a Rideshare Plan. Thus, the Project would not generate unnecessary vehicular travel.

The Los Angeles County Sheriff's Department (LASD) staffing of the MLWDC and hiring protocol would allow a "first right of refusal" to a pool of approximately 70 LASD staff members who remain employees and previously worked at MLDC under the U.S. Immigration and Customs Enforcement (ICE) operations. These employees are more likely to be residents of the Antelope Valley or Santa Clarita Valley due to their previous work at MLDC, although it is unknown how many of these former LASD employees would transfer back to work at the MLWDC.

After former employees under the ICE operations are offered an opportunity to fill positions at the MLWDC, the LASD would then open up opportunities throughout the existing LASD employment workforce. Detailed review of all LASD staff zip code data shows that a total of 2,602 LASD employees currently reside in the Santa Clarita and Antelope Valley areas. While it is not known how many current LASD employees would request a work assignment transfer to the MLWDC, it can be assumed that current LASD employees that live in the Antelope Valley or Santa Clarita Valley area may be interested in working at the MLWDC to reduce their commutes to other LASD facilities.

As discussed above, features to reduce VMT have been incorporated into the Project, such as first hiring from Sheriff's staff that are more likely to live in the Antelope Valley area, increasing video visiting opportunities, and supporting use of alternative transportation options (e.g., Metrolink, AVTA buses, carpooling/vanpooling) per discussions in Section 4.6, Greenhouse Gas Emissions. Therefore, the associated energy use by the Project would not be considered inefficient, wasteful, or unnecessary. Impacts would be less than significant and no mitigation is required.

Off-Site Impacts

Construction and use of the proposed driveway improvements and water line extensions and connection would result in minor energy demands that would not be considered inefficient, wasteful, or unnecessary. Impacts would be less than significant. No mitigation is required.

4.15.7 CUMULATIVE IMPACTS

Electrical power and natural gas services would be provided by SCE and SCG on demand, consistent with CPUC requirements. The federal and State governments have enacted legislation to improve energy efficiency in vehicles, equipment, and appliances; to reduce vehicle miles travelled; and to develop alternative fuels or energy sources. Utility companies are also increasing their renewable energy sources to meet the RPS mandate of 33 percent renewable supplies by 2020.

On-site energy use would be reduced through compliance with Title 24, the CalGreen Code (as adopted by the County into Title 31 of the County Code), and other energy conservation programs and policies. The Project's power demand would be off-set by up to one MW of electricity generated by the County's adjacent solar energy facility, which would further reduce demand on non-renewable sources. Cumulative projects in the County would also comply with the same

regulations, and cumulative projects in Lancaster would comply with the CalGreen Code, which has been adopted by the City of Lancaster in Chapter 15.34 of the Lancaster Municipal Code, and the City's Trip Reduction and Travel Demand Measures (Chapter 15.56 of the Lancaster Municipal Code).

Transportation energy use would increase with the Project and cumulative projects in the area. However, this transportation energy use would not represent a major amount of energy use in the City of Lancaster, the County of Los Angeles, or the region, when compared to the amount of existing development and to total number of vehicle trips and vehicle miles travelled throughout the County and the region. Improved fuel economy in newer vehicles and alternative fuel vehicles are also expected to reduce transportation energy use.

As older appliances, equipment, and vehicles are replaced with newer ones, total energy use is expected to decrease over time. Thus, energy use from the Project and cumulative projects would not represent a substantial demand for energy and would not be considered inefficient, wasteful, or unnecessary. Cumulative impacts would be less than significant and no mitigation is required.

4.15.8 MITIGATION MEASURES

There would be no significant impacts related to Energy and no mitigation is required.

4.15.9 LEVEL OF SIGNIFICANCE AFTER MITIGATION

Impacts on Energy would be less than significant and no mitigation is required.

4.15.10 REFERENCES

California Building Standards Commission (CBSC). 2014. CALGreen Code. Sacramento, CA: CBSC. <http://www.bsc.ca.gov/Home/CALGreen.aspx>.

California Energy Commission (CEC). 2015. 2013 Building Energy Efficiency Standards. Sacramento, CA: CEC. <http://www.energy.ca.gov/title24/2013standards/index.html>.

———. 2007 (December). *Final Adopted State Alternative Fuels Plan*. Sacramento, CA: CEC.

California Public Utilities Commission (CPUC). 2015 (May 21, last modified). California Renewables Portfolio Standard (RPS). San Francisco, CA: CPUC. <http://www.cpuc.ca.gov/PUC/energy/Renewables/>.

———. 2014. *Renewables Portfolio Standard – Quarterly Report 3rd Quarter 2014*. San Francisco, CA: CPUC.

DLR Group. 2015. Mira Loma Detention Center Women's Facility Project - Operations and Maintenance Data. Santa Monica, CA: DLR Group.

Linscott, Law and Greenspan (LLG). 2015 (April). *Traffic Impact Study, Mira Loma Women's Detention Center, City of Lancaster, California*. Pasadena, CA: LLG.

Los Angeles, County of. 2015 (March 17, access date). Renewable Energy. Los Angeles, CA: LACDRP. <http://planning.lacounty.gov/energy>

Los Angeles, County of, Sheriff's Department (LASD). 2015 (February 23). Personal communication. Email from K.M. Porowski, Lieutenant (LASD) to A. Ramos, Project Manager (LACDPW).

Oak Ridge National Laboratory (ORNL). 2014 (July). *Transportation Energy Data Book: Edition 33*. Oak Ridge, TN: ORNL.

Southern California Edison Company (SCE). 2015 (January 21, date accessed). About Edison International's Companies. Rosemead, CA: SCE. <https://www.edison.com/home/about-us/our-companies.html>.

Southern California Gas Company (SCG). 2015 (January 21, date accessed). California Energy Hub. Chatsworth, CA: SCG. <http://www.socalgas.com/for-your-business/ceh.shtml>.

———. 2014 (November 21). Personal communication. Letter from T. Bruce, Planning Associate (Southern California Gas Company) to D. Sarraf, Assistant Environmental Planner (BonTerra Psomas).

U.S. Energy Information Administration (USEIA). 2009 (August, last revised). U.S. Commercial Buildings Energy Intensity: Table 6b, U.S. Commercial Buildings Energy Intensity Using Weather-Adjusted Site Energy by Census Region and Principal Building Activity, 1992, 1995, and 2003 (Thousand Btu per Square Foot). Washington, D.C.: USEIA. http://www.eia.gov/emeu/efficiency/cbecstrends/cbi_pdf/cbecs_trends_6b.pdf.

SECTION 5.0 PROJECT ALTERNATIVES

5.1 CALIFORNIA ENVIRONMENTAL QUALITY ACT REQUIREMENTS FOR ALTERNATIVE ANALYSIS

This section discusses the potential impacts of alternatives that present alternate approaches to attain the objectives of the proposed Mira Loma Women's Detention Center (MLWDC) Project. Sufficient information about each alternative is included to allow meaningful evaluation, analysis, and comparison with the proposed Project. Per Section 15126.6(d) of the California Environmental Quality Act (CEQA) Guidelines, potential significant effects of the alternatives are discussed in less detail than the significant effects of the Project as proposed.

Sections 15126.6(a) through 15126.6(f) of the State CEQA Guidelines (14 *California Code of Regulations* [CCR]) provide guidance on the alternatives to a proposed project that must be evaluated in an Environmental Impact Report (EIR). Because an EIR must identify ways to mitigate or avoid the significant effects that a project may have on the environment (*California Public Resources Code*, Section 21002.1), the discussion of alternatives must focus on alternatives to the project or its location that 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.

An EIR must describe a range of reasonable and of potentially feasible alternatives to the proposed Project, or to the location of the Project, which would feasibly attain most of the basic Project Objectives but would avoid or substantially lessen any significant effects. The comparative merits of the alternatives must be evaluated.

An EIR need not consider every conceivable alternative, but it must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation. An EIR is not required to consider alternatives that are infeasible. The range of alternatives is governed by a "rule of reason" that requires discussion of only those alternatives necessary for the County of Los Angeles Board of Supervisors (Board) to make a reasoned choice.

Section 15126.6(c) of the State CEQA Guidelines provides guidance regarding the selection of a reasonable range of alternatives:

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. The EIR should briefly describe the rationale for selecting the alternatives to be discussed. The EIR should also identify any alternatives that were considered by the lead agency but were rejected as infeasible during the scoping process and briefly explain the reasons underlying the lead agency's determination. Additional information explaining the choice of alternatives may be included in the administrative record. Among the factors that may be used to eliminate alternatives from detailed consideration in an EIR are: (i) failure to meet most of the basic project objectives, (ii) infeasibility, or (iii) inability to avoid significant environmental impacts.

Section 15126.6(f)(1) of the State CEQA Guidelines provides guidance regarding feasibility:

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).

5.2 BACKGROUND ON PROJECT ALTERNATIVES

5.2.1 JAIL PLAN EVALUATION

Vanir Construction Management, Inc. (Vanir) was commissioned by the County of Los Angeles (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) 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 was revised in 2014, and both the 2013 and 2014 versions of the document are located in Appendix A-4 of this EIR.

The Jail Plan Report was issued on July 5, 2013 and it identified several critical needs for the County-wide jail system, including the need to: (1) close and demolish Men's Central Jail; (2) provide appropriate mental health treatment facilities; (3) restore Twin Towers Correctional Facility 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 5-1:

**TABLE 5-1
JAIL PLAN REPORT SUMMARY OF OPTIONS**

Option	Description	New Beds	Total Operating Capacity (Beds)	Total Estimated Project Cost
1A	New CCTF and New Women's Village at PDC	4,800 (CCTF) 1,156 (Female-PDC)	20,645	\$405 Million
1B	New CCTF and Modernize/Re-Open MLDC	4,800 (CCTF) 1,604 (Female- MLDC)	21,093	\$456 Million
2	New CCTF and No New Women's Facility	5,800 (CCTF) 0 (Female)	20,489	\$442 Million
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
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
Facility Names CCTF: Consolidated Correctional Treatment Facility PDC: Pitchess Detention Center, Santa Clarita, CA. MLDC: Mira Loma Detention Center, Lancaster, CA Source: Vanir 2014				

As described in Section 3.0, Project Description, the County has been conditionally awarded Assembly Bill (AB) 900 funds, which are available to State prison projects, re-entry facilities, and local jails. The initial conditional award of AB 900 grant funds by the California Board of State and Community Corrections (BSCC) was to develop a 1,156 bed female detention facility at Pitchess Detention Center (PDC), which required the construction of new inmate housing for 1,156 low- to medium-security female inmates, a 26-bed clinic, and other site improvements. This was considered in Option 1A of the Jail Plan Report. The schedule for developing a female facility at PDC was delayed due to real estate title issues and easements by Southern California Edison and Vintage Oil Corporation over the subject site within PDC. In order to maintain eligibility for the AB 900 grant, the County began consideration of alternate sites for the female facility.

Of the options presented in the Jail Plan Report, Option 1B is the most reflective of the County's decision to evaluate the proposed MLWDC Project. As shown below for Option 1B, the background of the Jail Plan Report was intended to be an evaluation of the entire jail system and was not a focused evaluation of the specific needs of the female inmate population. The components of Option 1B 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 re-open Mira Loma Detention Center (MLDC) 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; and
- Construct new boiler plant for TTCF at the downtown MCJ site.

On July 16, 2013, the Board provided direction to various County departments regarding items related to the Jail Plan Report, including direction for Vanir to work with County departments to provide any additional analysis and data, as needed on the various options set forth in the Jail Plan Report, and direction for the CEO to make a formal inquiry with the BSCC about the conditions upon which the AB 900 funds could be used other than for the PDC facility (County 2013a).

On August 20, 2013, the CEO returned to the Board with their proposal letter to the BSCC to pursue construction and operation of the "Women's Village" Project at the Mira Loma Detention Center (MLDC) property, rather than at the PDC. This approach was suggested to be advantageous based on the following considerations, as set forth in the CEO's letter to the BSCC (CEO 2013):

- MLDC, a County-owned facility, became available for re-use due to the vacation of the Immigration and Customs Enforcement (ICE) Bureau through their contract termination.
- MLDC had lower cost requirements to accommodate the 1,156 female inmates when compared to the costs at PDC.
- MLDC has existing infrastructure that could be used to expedite delivery of the "Women's Village" Project.

- MLDC has no real estate title issues of concern, whereas the PDC site had easements of Southern California Edison and Vintage Oil Corporation to be resolved.

On October 22, 2013, the Board agreed to evaluate the use of a portion of the MLDC property as the proposed site for the female detention facility in lieu of the PDC site previously approved by the Board (County of Los Angeles 2013b).

5.2.2 CONTEXT FOR ALTERNATIVES SELECTION

As discussed in Sections 4.1 through 4.15 of this EIR, neither short-term construction nor long-term operation of the proposed MLWDC Project would result in significant impacts after mitigation. As stated in Section 15126.6(b) of the State CEQA Guidelines, the fundamental purpose of “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.” As such, the proposed MLWDC Project already meets the goal of the alternatives analysis, which is to avoid or substantially lessen any significant effects on the environment.

Therefore, defining a reasonable range of alternatives is not focused on avoiding or substantially lessening significant effects, because the Project already accomplishes this, but instead it focuses on disclosing the potential environmental effects of other feasible alternatives to make sure that they are not more environmentally impactful than the proposed Project. Alternatives chosen for evaluation are limited to those alternatives necessary for the Board of Supervisors to make a reasoned choice about whether or not to approve the proposed Project.

5.3 PROJECT GOAL AND OBJECTIVES

5.3.1 COUNTY OF LOS ANGELES STRATEGIC PLAN

The County has established a Strategic Plan, most recently updated in 2012, that sets forth three Strategic Plan Goals. The MLWDC Project's support and consistency with these goals is briefly discussed below (County of Los Angeles 2012).

- **Operational Effectiveness:** Maximize the effectiveness of process, structure, and operations to support timely delivery of customer-oriented and efficient public services.

MLWDC Project Consistency: The Project reflects the County's prioritization of “effective process” through the selection of the MLWDC, which considered other potential locations and various fiscal and logistical factors prior to the site selection, as discussed above. The MLWDC would represent an “efficient delivery customer-oriented and efficient public services” due to the delivery Education Based Incarceration (EBI) and Gender Responsive Rehabilitation (GRR) programs to female inmates in the context of the fiscally responsible re-use of an existing unutilized County-owned asset.

- **Fiscal Sustainability:** Strengthen and enhance the County's capacity to sustain essential County services through proactive and prudent fiscal policies and stewardship.

MLWDC Project Consistency: The Project would sustain and improve “essential County services” through the detention and rehabilitation of low- to medium-security female inmates through the delivery of EBI and GRR programs. The Project reflects the County's prioritization of “proactive and prudent fiscal policies and stewardship” through their pursuit of AB 900 funds, which leverages the County's funds toward the renovation and re-use of an existing unutilized County-owned asset.

- **Integrated Service Delivery:** Maximize opportunities to measurably improve client and community outcomes and leverage resources through the continuous integration of health, community, and public safety services.

MLWDC Project Consistency: The Project's delivery of EBI and GRR programs is intended to "measurably improve client and community outcomes" through reduced recidivism for female inmates. The Project would "leverage resources" through the pursuit of AB 900 funds, and would integrate "health, community, and public safety services" through the suite of EBI and GRR programs proposed at MLWDC.

5.3.2 PROJECT GOAL

The Project's goal is to provide detention facilities for low- to medium-security level female inmates that meet modern correctional standards and that prioritize the on-site integration of gender-responsive female inmate education, treatment, and vocational training. This goal focuses on providing a secure detention facility with cost-effective therapeutic and rehabilitative programs to meet needs of eligible female inmates in order to reduce recidivism.

5.3.3 PROJECT OBJECTIVES

The objectives of the Project are as follows:

- A. To prioritize the on-site integration of gender-responsive female inmate education, treatment, and vocational training to reduce female inmate recidivism.
 - 1. To maximize system-wide efficiencies for County jails by providing a women's facility that meets the needs of the female population allowing for Gender Responsive Rehabilitation (GRR) model programming for eligible low- to medium-security female inmates.
 - 2. To provide a facility reflective of "real world" living that incorporates abundant natural light, opportunities for social interactions in landscaped open spaces, and defined functional areas to promote release readiness and community reintegration within a secured detention perimeter.
 - 3. To reduce recidivism through programming and development of a women's detention facility at a site with sufficient space to accommodate both campus-style inmate housing and support facilities for education and vocational training, implementing the best practices of Education Based Incarceration (EBI), within a secured detention perimeter.
- B. To provide a detention facility with capacity for eligible low- to medium-security level female inmates.
 - 4. To permit re-allocation of detention facilities designed for higher security levels for male inmates and/or inmates with special security or other needs to serve the appropriate security-level populations.
 - 5. To provide a facility with adequate capacity for a selected subset of the female inmate population based on security level and health status based on system trend analysis from data 2001-2013, which includes the beginning of the "AB 109" population of Low – Level (N3) Offender Population, and later state law changes.
 - 6. To reduce inmate overcrowding according to the BSCC standards for rated capacity, as determined for the qualifying female inmate population.

- C. To maximize the financial resources available to the County's correctional system for construction and operation of jail facilities serving female inmates.
7. To avoid or minimize land acquisition and entitlement costs and to efficiently use existing County-owned physical assets.
 8. To avoid or minimize costs and delays to resolve easement and other land title clearances involving other parties' property interests.
 9. To avoid new land use conflicts by prioritizing the re-use of currently or formerly operated County-owned property with detention facilities.
 10. To control the higher costs of new construction compared to the cost of renovation of existing facilities and the higher costs of maximum security construction compared to medium and low security detention facility construction by renovating and re-purposing existing facilities and infrastructure and/or designing separate low and medium security detention facilities where feasible.
 11. To maximize the use of state grant funds from AB 900 and any other grant funds, including the maximization of the number of female inmate beds covered per grant.
 12. To minimize the County's net cost to fund a female detention facility, including long-term operation and maintenance costs.

5.4 SUMMARY OF THE PROPOSED PROJECT

The MLWDC Project site is located in the City of Lancaster (City) on approximately 46 acres of the existing Mira Loma Detention Center (MLDC) site. The Project would involve the renovation, expansion, and/or re-use of the majority of the buildings within the currently unoccupied MLDC site to house eligible low- to medium-security level female inmates. Some buildings, facilities, and infrastructure within the MLDC site boundaries would be demolished to accommodate the new site plan, while the majority of the buildings would be renovated, expanded, and/or upgraded. Upon Project completion, eligible females would be transferred from the Century Regional Detention Facility (CRDF) to the MLDC site, which would accommodate beds for 1,604 female inmates and support facilities for various educational and rehabilitation services.

The Project would include dormitory housing in twinned barracks (896 beds), single barracks (68 beds), new transitional housing (384 beds), and Barracks E and F (256 beds), along with facilities for other support services (e.g., administration, visitation, kitchen, inmate processing, medical, education, recreation, and maintenance). In total, the Project would include approximately 365,210 gross square feet (gsf) of building space and approximately 63,400 square feet would be set aside for outdoor recreational activities and program space that would be accessible to the female inmates (e.g. sports courts and recreation fields, gardens, courtyards-passive recreational areas) within the secured perimeter.

The Project would be staffed by approximately 523 employees in total, with approximately 225 employees during the AM shift (6:00 AM to 2:00 PM); approximately 177 employees during the PM shift (2:00 PM to 10:00 PM); and approximately 121 employees during the EM shift (10:00 PM to 6:00 AM). This would include Los Angeles County Sheriff's Department (LASD) security/sworn staff, LASD civilian staff, teachers, counselors, maintenance personnel, physicians, registered nurse practitioners, and other County employees.

A primary objective of the proposed MLWDC Project is to reduce recidivism through the provision of educational programs that are gender-responsive and provide inmates with the life skills and job skills necessary to facilitate a successful transition into post-incarceration life. Some of the programs proposed at MLWDC to reduce recidivism include Education Based Incarceration (EBI) programming, gender-responsive programming (GRR), and the Fire Camp Program. MLWDC programs would include general education classes, computer training, general and vocational career technical education, career counselling, a learning resource center, a library and computer labs, culinary classes, and indoor/outdoor recreation.

5.4.1 SIGNIFICANT AND UNAVOIDABLE IMPACTS

Alternatives to the Project include those that would attain most of the Project objectives listed above, while reducing one or more of the significant and unavoidable impacts of the Project, if any. Based on the analyses in Sections 4.1 through 4.15, the Project would result in significant environmental effects prior to mitigation on a number of environmental topics. Following mitigation, however, impacts to all of these topical areas would be avoided or reduced to less than significant levels with the implementation of mitigation measures. No significant and unavoidable impacts would occur with the Project.

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

- **Section 4.1, Aesthetics**

Impact AES-1: The Project has the potential to introduce new light sources that may result in substantial light impacts that could adversely affect day or nighttime views in the area. Implementation of MM AES-1 would reduce this potential impact to levels considered less than significant.

- **Section 4.3, Biological Resources**

Impact BIO-1: The Project's short-term construction activities may result in the removal/demolition of potentially occupied bat maternity roosts. Implementation of MM BIO-1 would reduce this potential impact to levels considered less than significant.

Impact BIO-2: Active bird/raptor nests could be adversely impacted either directly or indirectly during Project construction. Implementation of MM BIO-2 would reduce this potential impact to levels considered less than significant.

Impact BIO-3: Earth-moving activities within the drainage area along West Avenue I have the potential to impact waters of the State, which are under the jurisdiction of the California Department of Fish and Wildlife and the Lahontan Regional Water Quality Control Board. Implementation of MM BIO-3 would reduce this potential impact to levels considered less than significant.

- **Section 4.4, Cultural Resources**

Impact CUL-1: Grading and excavation associated with construction of the Project would have the potential to disturb any underlying archaeological resources. Implementation of MM CUL-1 would reduce this potential impact to levels considered less than significant.

Impact CUL-2: Excavation activities on and off the site could disturb or destroy paleontological resources beneath the site. Implementation of MM CUL-2 would reduce this potential impact to levels considered less than significant.

- **Section 4.7, Hazards and Hazardous Materials**

Impact HAZ-1: Building materials that have not been previously sampled may contain asbestos and pose health hazards to the construction crew and future occupants of the Project site. Implementation of MM HAZ-1 would reduce this potential impact to levels considered less than significant.

Impact HAZ-2: Painted or ceramic surfaces that were not previously sampled may contain lead-based paint and pose health hazards to the construction crew and future occupants of the Project site. Implementation of MM HAZ-2 would reduce this potential impact to levels considered less than significant.

Impact HAZ-3: Use of the underground storage tanks at the fueling island that failed leak detection tests may result in unknown soil and groundwater contamination and could pose health hazards to future occupants of the Project site. Implementation of MM HAZ-3 would reduce this potential impact to levels considered less than significant.

- **Section 4.10, Noise**

Impact NOI-1: The use of stationary equipment during construction may impact adjacent residences on 60th Street West. Implementation of MM NOI-1 would reduce this potential impact to levels considered less than significant.

- **Section 4.14, Utilities and Service Systems**

Impact UTL-1: Operation of the Project would require imported water supplies. Contractual obligations and payments would be required to ensure that water supply from the State Water Project (through the Antelope Valley-East Kern Water Agency and Los Angeles County Water District No. 40) is available to serve the Project. Implementation of MM UTL-1 would reduce this potential impact to levels considered less than significant.

5.5 **SUMMARY OF ALTERNATIVES CONSIDERED**

The following alternatives to the MLWDC Project were considered by the County to be potentially feasible and warranting consideration:

- No Project
- Alternate Location – County Owned Detention Centers
 - Female Inmate Transfer to Existing and Occupied Male Jail Facilities
 - New Women's Facility at Pitchess Detention Center (PDC)
 - New Women's Facility at Sybil Brand Institute (SBI)
 - New Annex at Century Regional Detention Facility (CRDF)
 - Building Expansion of CRDF
- Reduced MLWDC Capacity – No Expansion
- Two Separate Women's Facilities (at MLDC and PDC South)

As discussed above, an EIR should identify alternatives that were considered by the Lead Agency but were eliminated from detailed consideration because they were determined to be infeasible during the scoping process and briefly explain the reasons underlying the Lead Agency's determination. Of the potential alternatives listed above, two were eliminated from further consideration based on one or more of the following: (i) failure to meet most of the basic project objectives, (ii) infeasibility, or (iii) inability to avoid significant environmental impacts.

As discussed below in Section 5.6, the “Alternate Location – Female Inmate Transfer to Existing and Occupied Male Jail Facilities” was eliminated from further consideration due to failure to meet most of the basic Project objectives and due to infeasibility. The “Alternate Location – New Women’s Facility at Sybil Brand Institute (SBI)” was eliminated from further consideration due to its failure to meet the qualification for consideration in an alternatives analysis that the alternative must be less environmentally impactful than the proposed Project. Additionally, the use of SBI would not meet most of the basic Project objectives. The “Alternate Location – Building Expansion of CRDF” was eliminated from further consideration due to failure to meet most of the basic Project objectives and due to infeasibility.

As discussed in Section 5.7, the remaining potential alternatives were assessed in an environmental comparison because they are required for evaluation pursuant to CEQA (i.e., No Project), or because they were preliminarily determined to be feasible and to meet most of the basic Project objectives, including the following:

- Alternative 1A and 1B: No Project
- Alternative 2: Alternate Location – New Women’s Facility at Pitchess Detention Center
- Alternative 3: Alternate Location – New Annex at Central Regional Detention Facility
- Alternative 4: Reduced Mira Loma Women’s Detention Center Capacity – No Expansion
- Alternative 5: Two Separate Women’s Facilities (at Mira Loma Detention Center and Pitchess Detention Center South)

5.6 ALTERNATIVES CONSIDERED AND REJECTED DURING THE SCOPING AND PROJECT PLANNING PROCESS

As stated in Section 15126.6(f)(2) of the State CEQA Guidelines, the first step in the alternatives analysis is to determine whether any of the significant effects of the Project would be avoided or substantially lessened by putting the Project in another location. Only locations that would avoid or substantially lessen the Project’s significant effects need be considered for inclusion in the EIR. Importantly, the MLWDC Project is a renovation project that would utilize existing on-site facilities and improvements, and there is no alternate site that could be a feasible alternative for a renovation project. The only other unoccupied facility that would be available for renovation would be SBI, which is discussed below. Additionally, because the proposed MLWDC Project would have no significant environmental impacts after mitigation, there is no need to evaluate alternate locations. Section 15126.6(f)(3) further states that “an EIR need not consider an alternative whose effect cannot be reasonably ascertained and whose implementation is remote and speculative”.

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 inventoried and evaluated all existing LASD jail facilities, including Men’s Central Jail (MCJ); Twin Towers Correctional Facility (TTCF)/ Correctional Treatment Center (CTC); Century Regional Detention Facility (CRDF); Pitchess Detention Center East (PDC East); Pitchess Detention Center North (PDC North); Pitchess Detention Center South (PDC South); and North County Correctional Facility (NCCF) (CEO 2013). The Jail Plan report also inventoried Sybil Brand Institute (SBI) and the Mira Loma Detention Center (MLDC) (Vanir 2013). Potentially feasible alternative locations is limited to those alternative sites that also currently contain County-owned jail/detention facilities.

Table 5-2 below provides the list of the County-owned detention centers and jails that was used to determine whether any of the listed properties should be evaluated in the alternatives analysis for detailed consideration.

**TABLE 5-2
COUNTY DETENTION CENTER AND JAIL EVALUATION**

Facility Name	Inmate Classification	2013 Inmate Security Level	BSCC Rated Capacity Beds
CRDF	Designed for Male Inmates (Housing Female Inmates): High/Med Security	FEMALE: High to Low and Medical	1,588
SBI	Designed for Female Inmates: High/Med/Low Security	None	790
MCJ	Designed for Male Inmates: High/Med Security	High to Medium and Medical	5,108
Twin Towers	Designed for Male or Female Inmates: High Security	High to Low and Medical	2,244
PDC (NCCF)	Designed for Male Inmates: Medium Security	High to Low	2,208
PDC (East)	Designed for Male Inmates: High Security	High to Med	926
PDC (North)	Designed for Male Inmates: Medium Security	High to Med	768
PDC (South)	Designed for Male Inmates: Medium Security	Med to Low	846
MLDC	Designed for Male Inmates: Medium Security	None	880

BSCC: California Board of State and Community Corrections; O&M: Operation and Maintenance; N/A: not applicable
Facility Names
CRDF: Century Regional Detention Facility, Lynwood, CA.
SBI: Sybil Brand Institute, Monterrey Park, CA
MCJ: Men's Central Jail, Los Angeles, CA.
PDC: Pitchess Detention Center, Santa Clarita, CA.
NCCF: North County Correctional Facility, Santa Clarita, CA
MLDC: Mira Loma Detention Center, Lancaster, CA
Source: Vanir 2013, BSCC 2013

5.6.1 ALTERNATE LOCATION – FEMALE INMATE TRANSFER TO EXISTING AND OCCUPIED MALE JAIL FACILITIES

The Men's Central Jail (MCJ), Twin Towers Correctional Facility (TTCF), North County Correctional Facility (NCCF) at the Pitchess Detention Center (PDC), PDC North, and PDC South are existing detention facilities currently occupied and utilized for male inmates. PDC East is designed for higher-security male population but is currently being used by the Fire/Conservation Camp Program. Because the relocation of the Fire Camp Program to other LASD facilities is possible, the use of PDC East could be considered a facility that is available to accommodate a relocated inmate population. However, the use of higher-security structures occupied with male inmates as an alternative to the rehabilitation of MLDC would be infeasible for a number of reasons.

Vacating an existing occupied facility in order to house the female inmate population would necessitate the development of new higher-security facilities to accommodate the displaced male inmates. Displacing the males currently housed in occupied facilities to accommodate the placement of female inmates, in light of the vacancy of MLDC, would be counterproductive to the County's goal of alleviating overcrowded conditions in the LASD jail system, considering the best use of existing County Jail facilities and financial resources. The low- and medium-security female

inmates that would be accommodated by the MLWDC Project do not require a high-security facility. High-security facilities are more expensive to build, operate, and maintain than facilities designed for a lower-security level female population.

Vacating an existing occupied facility in order to house the female inmate population would be contrary to the majority of the basic Project objectives (see Table 5-3). As such, the potential redevelopment of existing high-security County-owned facilities for use by female inmates was eliminated from further consideration as an alternative to the Project due to failure to meet most of the basic Project objectives and due to infeasibility.

**TABLE 5-3
ALTERNATE LOCATION – EVALUATION OF FEMALE INMATE TRANSFER
TO EXISTING AND OCCUPIED MALE JAIL FACILITIES AND PROJECT
OBJECTIVES**

Objective	Consistency Analysis
A. To prioritize the on-site integration of gender-responsive female inmate education, treatment, and vocational training to reduce female inmate recidivism.	
1. To maximize system-wide efficiencies for County jails by providing a women's facility that meets the needs of the female population allowing for Gender Responsive Rehabilitation (GRR) model programming for eligible low- to medium-security female inmates.	Not Consistent. Displacing the male inmates currently housed in occupied facilities to accommodate the placement of female inmates, in light of the vacancy of MLDC, would not maximize system-wide efficiencies. Occupied facilities are not designed for low- to medium-security female inmates and would not provide adequate space for GRR model programming.
2. To provide a facility reflective of "real world" living that incorporates abundant natural light, opportunities for social interactions in landscaped open spaces, and defined functional areas to promote release readiness and community reintegration within a secured detention perimeter.	Not Consistent. None of the currently occupied jails or detention centers provide abundant natural light or landscaped open space areas reflective of "real world" living to promote release readiness and community reintegration due to their design as higher-security facilities designed and built for a male population.
3. To reduce recidivism through programming and development of a women's detention facility at a site with sufficient space to accommodate both campus-style inmate housing and support facilities for education and vocational training, implementing the best practices of Education Based Incarceration (EBI), within a secured detention perimeter.	Not Consistent. This approach would not develop a women's detention facility, but would rather re-purpose existing occupied male facilities. Occupied facilities are not designed for low- to medium-security female inmates and would not provide adequate space for EBI programming.
B. To provide a detention facility with capacity for eligible low- to medium-security level female inmates.	
4. To permit re-allocation of detention facilities designed for higher security levels for male inmates and/or inmates with special security or other needs to serve the appropriate security-level populations.	Not Consistent. Displacing the male inmates currently housed in occupied facilities to accommodate the placement of female inmates would not permit the re-allocation of detention facilities to appropriate security-level populations.
5. To provide a facility with adequate capacity for a selected subset of the female inmate population based on security level and health status based on system trend analysis from data 2001-2013, which includes the beginning of the "AB 109" population of Low – Level (N3) Offender Population, and later state law changes.	Consistent. Other LASD jails and detention centers could accommodate the female inmate population.

**TABLE 5-3
ALTERNATE LOCATION – EVALUATION OF FEMALE INMATE TRANSFER
TO EXISTING AND OCCUPIED MALE JAIL FACILITIES AND PROJECT
OBJECTIVES**

Objective	Consistency Analysis
6. To reduce inmate overcrowding according to the BSCC standards for rated capacity, as determined for the qualifying female inmate population.	Not Consistent. Displacing the male inmates currently housed in occupied facilities to accommodate the placement of female inmates would not permit the re-allocation of detention facilities to reduce overcrowding.
C. To maximize the financial resources available to the County's correctional system for construction and operation of jail facilities serving female inmates.	
7. To avoid or minimize land acquisition and entitlement costs and to efficiently use existing County-owned physical assets.	Unknown. Vacating an occupied existing facility in order to house the female inmate population would necessitate the development of new higher-security facilities to accommodate the displaced male inmates. This could result in land acquisition and/or entitlement costs, but it is too speculative to determine at this time.
8. To avoid or minimize costs and delays to resolve easement and other land title clearances involving other parties' property interests.	Unknown. Vacating an occupied existing facility in order to house the female inmate population would necessitate the development of new higher-security facilities to accommodate the displaced male inmates. This could result in easement or other land title clearance issues, but it is too speculative to determine at this time.
9. To avoid new land use conflicts by prioritizing the re-use of currently or formerly operated County-owned property with detention facilities.	Unknown. Vacating an occupied existing facility in order to house the female inmate population would necessitate the development of new higher-security facilities to accommodate the displaced male inmates. This could result in land use conflicts, but it is too speculative to determine at this time.
10. To control the higher costs of new construction compared to the cost of renovation of existing facilities and the higher costs of maximum security construction compared to medium and low security detention facility construction by renovating and re-purposing existing facilities and infrastructure and/or designing separate low and medium security detention facilities where feasible.	Unknown. Vacating an occupied existing facility in order to house the female inmate population would necessitate the development of new higher-security facilities to accommodate the displaced male inmates. This could result in higher costs for maximum security construction, but it is too speculative to determine at this time.
11. To maximize the use of state grant funds from AB 900 and any other grant funds, including the maximization of the number of female inmate beds covered per grant.	Not Consistent. This alternative is not consistent with the County's grant application that was approved by the BSCC and would not allow for the use of AB 900 grant funds. No other grants are known to be available at this time.
12. To minimize the County's net cost to fund a female detention facility, including long-term operation and maintenance costs.	Not Consistent. The low- and medium-security female inmates that would be accommodated by the MLWDC Project do not require a high-security facility. High-security facilities are more expensive to build, operate, and maintain than facilities designed for a lower-security level female population.

5.6.2 ALTERNATE LOCATION – NEW WOMEN'S FACILITY AT SYBIL BRAND INSTITUTE

The Sybil Brand Institute (SBI) was built in 1963 for female inmates and the structure consists of 231,954 gross square feet (gsf) of total building area. The SBI, located in the City of Monterey Park at 4500 East City Terrace Drive, was constructed for the purpose of housing all system-wide female inmates. In 1997, the SBI had a capacity of 942 beds in the year of its closure.

The existing facilities within SBI are in critical need of repair/renovation due to historic wear and tear, earthquake damage, and effects of being dormant for the past ten years. The jail facilities are not designed to current *California Code of Regulations* (CCR) (Title 15 and Title 24, pertaining to planning and design of detention facilities) standards and do not meet seismic requirements. Within the main jail facility, paint has peeled from the walls; ceramic tiles and ceiling panels have popped off; and water periodically collects beneath the leaking roof. Moreover, the plumbing, electrical, and ventilation systems are in need of replacement. Additionally, the jail's cells are too small to meet current state regulations, and the facility's backup power generators are in need of replacement (DMJM 2007).

Due to the condition of the SBI facilities, the County previously considered the demolition of the existing facility and the construction of a new "podular" detention facility at the site to accommodate 1,024 beds for female inmates. However, this design alternative was eliminated from further consideration due to cost inefficiencies and environmental constraints.

There were several site development constraints that contributed to the elimination of the property for further consideration of development for the female custody facility. The SBI site is adjacent to the former Cogen landfill and the former Blanchard landfill. There is a history of landfill gas (LFG) emanating from the adjacent former Cogen Landfill that has the potential to pose a health and safety hazard to inmates and workers at SBI. Approximately 90 percent of the Cogen Landfill is privately owned and outside the influence of the County. The LFG issues associated with the Cogen Landfill would need to be addressed to the satisfaction of regulatory agencies prior to development of SBI and placement of a permanent female population at the site.

Regarding geotechnical constraints, a Limited Engineering Geology Review conducted by Kleinfelder in 2010 determined that the majority of the developed SBI facility and parking lot area has experienced approximately one foot of settlement since 2006. Settlement was more substantial in the adjacent site of the former Cogen Landfill (Kleinfelder 2008). The SBI property was constructed in 1963 and the building would require evaluation for historic significance. If determined to be a historic property, demolition would be a significant and unavoidable adverse environmental impact.

The SBI property is approximately 26 acres, over half of which includes a steeply sloped embankment that descends towards Interstate (I) 710. Due to the limited developable land area at the SBI, the previously proposed site concept would not allow for the development of a 1,604-bed facility in the campus-style development proposed at the MLWDC, which includes approximately 46 acres. Therefore, in order to develop a new detention facility at the SBI site that could support a campus character reflective of "real world" and GRR programming, which requires avoidance of vertical jail construction, re-development of SBI would require a smaller campus with a reduced female inmate capacity of up to 1,024 female inmates. Therefore, this 36 percent reduction in the capacity of the SBI to serve the qualifying female inmate population would necessitate the remaining females to be at CRDF, thereby requiring CRDF to become a mixed male/female facility, decreasing the efficiency of re-allocating higher-security facilities to the overcrowded male inmate population.

In addition to the site constraints and environmental concerns that led to the Board's determination that it was not the preferable location for the female custody center, the development proposal for the SBI property would not satisfy most of the basic Project objectives, as presented in Table 5-4 below. As such, the potential demolition of the SBI facility and subsequent construction of 1,024 beds for female inmates was eliminated from further consideration as an alternative to the Project.

**TABLE 5-4
EVALUATION OF THE PROJECT OBJECTIVES AND AN ALTERNATE
LOCATION – A NEW WOMEN'S FACILITY AT SYBIL BRAND INSTITUTE**

Objective	Consistency Analysis
A. To prioritize the on-site integration of gender-responsive female inmate education, treatment, and vocational training to reduce female inmate recidivism.	
1. To maximize system-wide efficiencies for County jails by providing a women's facility that meets the needs of the female population allowing for Gender Responsive Rehabilitation (GRR) model programming for eligible low- to medium-security female inmates.	Partially Consistent. The demolition of the SBI would allow for the construction of a female detention facility with space for the GRR model programming. However, there would be a 36% reduction in bed capacity (580 fewer beds than the MLWDC Project); therefore, systemwide efficiencies would not be maximized. Additionally, the CRDF would become a mixed male/female facility, which would further reduce staffing/operational efficiencies within the LASD jail system due to the split female inmate population.
2. To provide a facility reflective of "real world" living that incorporates abundant natural light, opportunities for social interactions in landscaped open spaces, and defined functional areas to promote release readiness and community reintegration within a secured detention perimeter.	Partially Consistent. The redevelopment of the SBI would include the construction of a new facility with abundant natural light and opportunities for social interactions in landscaped open spaces, as well as the provision of program space for GRR. However, 36% fewer qualifying female inmates would be served at the SBI, while the remaining population would be at CRDF. The CRDF does not meet the standards set forth in this objective.
3. To reduce recidivism through programming and development of a women's detention facility at a site with sufficient space to accommodate both campus-style inmate housing and support facilities for education and vocational training, implementing the best practices of Education Based Incarceration (EBI), within a secured detention perimeter.	Partially Consistent. A new facility with campus-style inmate housing and support facilities and program space for EBI could be provided at SBI. However, fewer women would be accommodated at the SBI campus; therefore, efforts to reduce recidivism through EBI programs would be less effective. The remaining population would be at CRDF, and CRDF does not meet the standards set forth in this objective.
B. To provide a detention facility with capacity for eligible low- to medium-security level female inmates.	
4. To permit re-allocation of detention facilities designed for higher security levels for male inmates and/or inmates with special security or other needs to serve the appropriate security-level populations.	Partially Consistent. The relocation of 1,024 female inmates from CRDF to SBI would partially allow for the re-use of the CRDF as a high-security male facility, thus, creating a mixed male/female facility at the CRDF.
5. To provide a facility with adequate capacity for a selected subset of the female inmate population based on security level and health status based on system trend analysis from data 2001-2013, which includes the beginning of the "AB 109" population of Low – Level (N3) Offender Population, and later state law changes.	Not Consistent. The SBI does not have the land area to provide a 1,604-bed facility while maintaining a campus-style housing reflective of "real world" living.
6. To reduce inmate overcrowding according to the BSCC standards for rated capacity, as determined for the qualifying female inmate population.	Partially Consistent. The redevelopment of SBI would reduce inmate overcrowding, but would not accommodate the 1,604 beds required to serve the qualifying female inmate population.

**TABLE 5-4
EVALUATION OF THE PROJECT OBJECTIVES AND AN ALTERNATE
LOCATION – A NEW WOMEN'S FACILITY AT SYBIL BRAND INSTITUTE**

Objective	Consistency Analysis
C. To maximize the financial resources available to the County's correctional system for construction and operation of jail facilities serving female inmates.	
7. To avoid or minimize land acquisition and entitlement costs and to efficiently use existing County-owned physical assets.	Partially Consistent. The redevelopment of SBI would not involve land acquisition or entitlement costs. However, it would not utilize existing County-owned facilities. A new facility would be constructed while other County assets (i.e., MLDC) would remain vacant. The creation of a male/female facility at the CRDF would divide resources for the qualifying female population and would not be the most efficient use of County-owned physical assets given the availability of the MLDC, which could accommodate 36% more female inmates.
8. To avoid or minimize costs and delays to resolve easement and other land title clearances involving other parties' property interests.	Consistent. The redevelopment of SBI would not involve easement or land title clearances.
9. To avoid new land use conflicts by prioritizing the re-use of currently or formerly operated County-owned property with detention facilities.	Consistent. The redevelopment of SBI would allow reuse of a currently County-owned and operated detention facility.
10. To control the higher costs of new construction compared to the cost of renovation of existing facilities and the higher costs of maximum security construction compared to medium and low security detention facility construction by renovating and re-purposing existing facilities and infrastructure and/or designing separate low and medium security detention facilities where feasible.	Not Consistent. The redevelopment of SBI would incur greater costs due to full demolition of the existing facility and required new construction, as well as measures required to ensure the safety of the inmates adjacent to two landfills. There would be additional cost inefficiencies associated with splitting the eligible female population between the SBI and the CRDF.
11. To maximize the use of state grant funds from AB 900 and any other grant funds, including the maximization of the number of female inmate beds covered per grant.	Not Consistent. This alternative is not consistent with the County's grant application that was approved by the BSCC and would not allow for the use of AB 900 grant funds. No other grants are known to be available at this time.
12. To minimize the County's net cost to fund a female detention facility, including long-term operation and maintenance costs.	Not Consistent. A portion of the qualifying female inmate population would still need to be served at CRDF. There would be additional cost inefficiencies associated with splitting the eligible female population between SBI and CRDF.

5.6.3 ALTERNATE LOCATION – BUILDING EXPANSION AT CRDF

The Century Regional Detention Facility (CRDF), located in Lynwood, California, opened in 1995 with a BSCC rated bed capacity of 1,588 for medium to high security male inmates. In 2006, CRDF's inmate population transitioned to an all-female facility. Approximately 2,200 female inmates, ranging from low to medium security classification, are currently housed at CRDF. Currently, CRDF contains a total of four classrooms and inmate treatment and programs generally occur in small and inflexible spaces that were not designed for these activities.

If the MLWDC Project is not built, CRDF may need to be expanded in order to accommodate the additional 612 inmates above the BSCC rated capacity, as well as provide additional programming space for the full inmate population. It is anticipated that CRDF would require an extensive expansion of approximately 84,060 sf in order to meet the present day needs of 2,200 inmates. This 84,060 sf would include 21,420 sf of double-occupancy cells; 21,420 sf of dayroom

area; 13,200 sf of programming space; 11,208 sf of departmental services; and 16,812 sf of building operation services.

CRDF is located in an urban site with horizontal growth limitations. Construction to meet current building requirements would likely require vertical construction in the form of added stories to the existing structure. An anticipated 1-2 additional stories would be required, which would impact the existing structure's loading and seismic performance dynamics, which were engineered in the early 1980's. While vertical construction is theoretically possible with proper engineering and construction, to address foundation and superstructure enhancements, such an approach is cost inefficient and would require the temporary relocation of inmates and operations for several years.

Even with the space addition, the overall environment of the CRDF facility would remain primarily an interior environment, not meeting the objectives of an open campus style and normative setting, like the proposed MLWDC Project. It is nearly impossible to provide an open campus and normative environment at CRDF, due to the limitations of unused space at the urban site. Thus, a campus setting cannot be addressed on the grounds of CRDF. This approach would also not allow for the redistribution of County detention facility assets to serve the appropriate security level inmate population and would not satisfy most of the basic Project objectives, as presented in Table 5-5 below. As such, it was eliminated from further consideration as an alternative to the Project.

**TABLE 5-5
EVALUATION OF THE PROJECT OBJECTIVES AND AN ALTERNATE LOCATION –
BUILDING EXPANSION AT CRDF**

OBJECTIVE	CONSISTENCY ANALYSIS
A. To prioritize the on-site integration of gender-responsive female inmate education, treatment, and vocational training to reduce female inmate recidivism.	
1. To maximize system-wide efficiencies for County jails by providing a women's facility that meets the needs of the female population allowing for Gender Responsive Rehabilitation (GRR) model programming for eligible low- to medium-security female inmates.	Not Consistent. The CRDF was designed as a high-security male facility. It would be feasible to renovate and expand the building to incorporate new space for the GRR model programming. However, the facility would still not be designed for low- to medium-security female inmates and would therefore not maximize efficiencies for the County jail system.
2. To provide a facility reflective of "real world" living that incorporates abundant natural light, opportunities for social interactions in landscaped open spaces, and defined functional areas to promote release readiness and community reintegration within a secured detention perimeter.	Not Consistent. There is no available land area at the CRDF to create a campus-style facility reflective of "real world" living. The facility is designed for high-security male inmates. There is very limited outdoor space at the CRDF and the addition of the new building and upper floors would provide program space, but would further reduce outdoor areas. Under this proposal, the facility would not provide abundant natural light or landscaped open space areas for social interaction or recreation. This would decrease opportunities for social interactions in landscaped open spaces and would be less effective at promoting release readiness for community reintegration.
3. To reduce recidivism through programming and development of a women's detention facility at a site with sufficient space to accommodate both campus-style inmate housing and support facilities for education and vocational training, implementing the best practices of Education Based Incarceration (EBI), within a secured detention perimeter.	Partially Consistent. The proposed new building and addition of upper floors would provide program space for GRR and EBI, but the lack of available land area would not accommodate campus-style inmate housing and support facilities.

**TABLE 5-5
EVALUATION OF THE PROJECT OBJECTIVES AND AN ALTERNATE LOCATION –
BUILDING EXPANSION AT CRDF**

OBJECTIVE	CONSISTENCY ANALYSIS
B. To provide a detention facility with capacity for eligible	low- to medium-security level female inmates.
4. To permit re-allocation of detention facilities designed for higher security levels for male inmates and/or inmates with special security or other needs to serve the appropriate security-level populations.	Not Consistent. The CRDF was designed as a high-security male facility and its renovation and continued use as a female inmate facility would not permit re-allocation of County detention facilities designed for higher security levels for male inmates and/or inmates with special security needs.
5. To provide a facility with adequate capacity for a selected subset of the female inmate population based on security level and health status based on system trend analysis from data 2001-2013, which includes the beginning of the "AB 109" population of Low – Level (N3) Offender Population, and later state law changes.	Consistent. The expansion of the CRDF can accommodate the female inmate population.
6. To reduce inmate overcrowding according to the BSCC standards for rated capacity, as determined for the qualifying female inmate population.	Partially Consistent. Keeping the inmates at the CRDF and expanding the existing facility would help to reduce inmate overcrowding. However, it would not provide 1,604 new beds into the County system that would allow for the transfer of male inmates out of other prison facilities.
C. To maximize the financial resources available to the	County's correctional system for facilities serving female inmates.
7. To avoid or minimize land acquisition and entitlement costs and to efficiently use existing County-owned physical assets.	Partially Consistent. This would not involve land acquisition or entitlement costs. However, it would not promote the efficient use of County-owned assets because it would not re-use existing vacant County-owned assets to allow for the re-allocation of detention facilities designed for higher security levels for male inmates.
8. To avoid or minimize costs and delays to resolve easement and other land title clearances involving other parties' property interests.	Consistent. Renovation and expansion of the CRDF would not involve easement or land title clearances.
9. To avoid new land use conflicts by prioritizing the re-use of currently or formerly operated County-owned property with detention facilities.	Consistent. Renovation and expansion of the CRDF would use a currently County-owned and operated detention facility.
10. To control the higher costs of new construction compared to the cost of renovation of existing facilities and the higher costs of maximum security construction compared to medium and low security detention facility construction by renovating and re-purposing existing facilities and infrastructure and/or designing separate low and medium security detention facilities where feasible.	Partially Consistent. Renovation and expansion of the CRDF would avoid costs of constructing a new facility. However, structural changes may result in significant cost increases. Also, it would not provide for a separate low-to medium-security detention center
11. To maximize the use of state grant funds from AB 900 and any other grant funds, including the maximization of the number of female inmate beds covered per grant.	Not Consistent. This is not consistent with the County's AB 900 grant application that was approved by the BSCC and would not allow for the use of AB 900 grant funds.

**TABLE 5-5
EVALUATION OF THE PROJECT OBJECTIVES AND AN ALTERNATE LOCATION –
BUILDING EXPANSION AT CRDF**

OBJECTIVE	CONSISTENCY ANALYSIS
12. To minimize the County's net cost to fund a female detention facility, including long-term operation and maintenance costs.	Not Consistent. Adding vertical space through the addition of floors to the top of the building would be more expensive than expanding horizontally. However, the needed programming space could not be accommodated in the new building alone. Additionally, operating a higher-security facility is more expensive than operating a low- to medium-security facility. Therefore, long-term operations and staffing costs would be more expensive than the MLWDC Project.

5.7 ALTERNATIVES UNDER CONSIDERATION

Remaining potentially feasible alternatives to the Project that meet most of the most basic Project objectives include:

- Alternative 1A: No Project/Continuation of Existing Operations
- Alternative 1B: No Project/Predictable Actions
- Alternative 2: Alternate Location – New Women's Facility at PDC
- Alternative 3: Alternate Location – New Annex at CRDF
- Alternative 4: Reduced Capacity at MLWDC
- Alternative 5: Two Separate Women's Facilities (at MLDC and PDC South)

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 Project. Pursuant to Section 15126.6(e) 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 (which are listed in Sections 3.2 and 5.3 of this EIR).

The comparison of impacts between each alternative and the Project assumes that the following would also be implemented to each of the alternatives, where appropriate: (1) construction and maintenance of needed utility improvements; (2) compliance with relevant Regulatory Requirements (RRs); and (3) implementation of the Mitigation Measures (MMs) identified in Section 4.0, Environmental Analysis, of this EIR.

As previously stated, neither short-term construction nor long-term operation of the proposed MLWDC Project would result in significant impacts after mitigation. As stated in Section 15126.6(b) of the State CEQA Guidelines, the fundamental purpose of "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". As such, the proposed MLWDC

Project already meets the goal of the alternatives analysis, which is to avoid or lessen any significant effects on the environment.

5.7.1 ALTERNATIVE 1A: NO PROJECT/CONTINUATION OF EXISTING OPERATIONS

Section 15126.6(e) of the State CEQA Guidelines requires that an EIR evaluate a “No Project” alternative in order to allow decision makers to compare the impacts of approving the proposed MLWDC Project with the impacts of not approving the proposed Project. Section 15126.6(e)(2) of the CEQA Guidelines specifies that the “No Project analysis shall discuss the existing conditions at the time the notice of preparation is published, or if no notice of preparation is published, at the time environmental analysis is commenced, as well as what would be expected 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”.

The CEQA Guidelines goes on to define two possible methods of analyzing the No Project alternative. CEQA Guidelines Section 15126.6(e)(3)(A), states that if the project is the revisions of an existing land use or regulatory plan, policy, or ongoing operation, the analysis should assume the continuation of the existing plan, policy, or operation into the future.

The proposed Project, as defined in Section 3.0 Project Description of this EIR, does not include any changes to the existing land use or regulatory plan or policy; however, it would change the “ongoing operation” of the MLDC. The MLDC has not housed any inmates or served any detention functions since November 2012, when the ICE terminated its contract with the County and withdrew from the site. Current staffing levels are minimal, with LASD staff on site daily for security. The MLDC is not occupied by inmates, nor is it serving any detention functions. Therefore, the requirement to analyze the continuation of the current “ongoing operation” of the Project site as required in CEQA Guidelines Section 15126.6(e)(3)(A), is discussed below. The approach set forth in CEQA Guidelines Section 15126.6(e)(3)(B) is discussed as Alternative 1B.

Under Alternative 1A, the MLDC site would remain in its existing unoccupied condition and no renovation or new construction would occur. Under Alternative 1A, female inmates would remain at the CRDF and no changes to existing CRDF facilities or operations would occur. CRDF has both dorm and high security single/double cell configurations. The cell configuration limits a communal environment and programming opportunities. As Alternative 1A does not propose a new facility or a change to an existing facility within the County’s jail system, there would be no improvements or alterations to County facilities or operations. EBI and GRR model programming and support services to reduce recidivism and to increase the success of transitioning out of the correctional setting would be provided at the same levels as currently offered in CRDF, but would be substantially less when compared to the proposed MLWDC Project due to the lack of space at the CRDF.

Comparative Analysis of Environmental Impacts

Aesthetics

Alternative 1A would not result in any changes to the visual quality or aesthetics of the MLDC site and no new aesthetics impacts would occur. Mitigation associated with the potential light spill-over onto nearby sensitive receptors from the proposed MLWDC Project would not be required.

Air Quality

Alternative 1A would not involve any increases pollutant emissions for construction or for operation, and no new air quality impacts would occur, including the elimination of potential exposure to Valley Fever.

Biological Resources

Alternative 1A would not disturb existing plant or animal species or their habitats and no new impacts to biological resources would occur. Mitigation associated with nesting birds and bat roosts, and for impacts to jurisdictional resources, for the proposed MLWDC Project would not be required.

Cultural Resources

Alternative 1A would not involve ground disturbance and no new impacts would occur to any known or unknown historical, archaeological, and paleontological resources. Mitigation associated with archaeological and paleontological impacts for the proposed MLWDC Project would not be required.

Geology and Soils

Alternative 1A would not involve exposure to geologic and seismic hazards and no new impacts related to geology and soils would occur.

Greenhouse Gas Emissions

Alternative 1A would not lead to the construction or rehabilitation of structures that could generate greenhouse gas (GHG) emissions and no new impacts to GHG emissions would occur.

Hazards and Hazardous Materials

Alternative 1A would not lead to demolition or construction activities that may encounter or utilize hazardous materials or wastes and no new impacts related to hazards and hazardous materials would occur. Mitigation associated with hazards (including underground storage tanks, lead-based paint, and asbestos) for the proposed MLWDC Project would not be required.

Hydrology and Water Quality

Alternative 1A would not involve any changes in existing drainage patterns, storm drainage, percolation rates, runoff volumes, or other hydrologic conditions. There would be no new sources of urban runoff or increases in storm water pollutants; therefore, no impacts related to water quality would occur. No change in water use from County-owned groundwater well sources in the Antelope Valley to Los Angeles County Waterworks District No. 40 (LACWWD40) sources would occur.

Land Use and Planning

Alternative 1A would not result in any changes to existing land uses, zoning, land use designations, or land use compatibility at the MLDC site.

Noise

Alternative 1A would not result in new construction or building rehabilitation, and no new sources of construction, vehicle, or stationary noise would be introduced to the Project site. At the same time, noise-sensitive uses near the proposed MLWDC would not be exposed to new noise sources because the MLDC site would remain vacant. Mitigation associated with Noise for the proposed MLWDC Project would not be required.

Population and Housing

Alternative 1A would not create any new jobs, nor would it involve the potential indirect development of housing that may increase the resident population of Lancaster area. It would not indirectly contribute to the economic growth in the Antelope Valley.

Public Services and Recreation

Alternative 1A would not change the demand for public services at the Project site or within Lancaster. It would not create new impacts related to public services or recreation.

Transportation and Traffic

Alternative 1A would not involve any changes to the existing roadways, traffic volumes, or operating levels of service near the Project site or in the Lancaster area. This alternative would not generate new vehicle trips over those existing from the CRDF.

Utilities and Service Systems

Alternative 1A would not create new demands for utilities and service systems at the Project site. Implementation of this alternative would not impact existing utility services or require new water supplies to serve the Project. Mitigation associated with new water supply sources for the proposed MLWDC Project would not be required.

Energy

Alternative 1A would not lead to demands for new energy resources or result in increases in long-term electrical or natural gas consumption or transportation energy use at the Project site.

Alternative 1A Summary

The proposed MLWDC Project would not result in any significant impacts after mitigation. Alternative 1A would result in no change to the environment and would therefore have no environmental impacts. As there would be no environmental impacts associated with Alternative 1A, it would be considered environmentally superior to the proposed MLWDC Project, as summarized in Table 5-6 below.

**TABLE 5-6
SUMMARY OF ALTERNATIVE 1A IMPACTS**

Environmental Issue	Potential Significance of Alternative's Impacts	Summary of MLWDC Project Impacts	Compared to Impacts of Project After Mitigation
Aesthetics	No impact	Less Than Significant After Mitigation	Less than Project
Air Quality	No impact	Less Than Significant	Less than Project
Biological Resources	No impact	Less Than Significant After Mitigation	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	Less than Project
Hazards and Hazardous Materials	No impact	Less Than Significant After Mitigation	Less than Project
Hydrology and Water Quality	No impact	Less Than Significant	Less than Project
Land Use and Planning	No impact	Less Than Significant	Less than Project
Noise	No impact	Less Than Significant After Mitigation	Less than Project
Population and Housing	No impact	Less Than Significant	Less than Project
Public Services and Recreation	No impact	Less Than Significant	Less than Project
Transportation and Traffic	No impact	Less Than Significant	Less than Project
Utilities and Service Systems	No impact	Less Than Significant After Mitigation	Less than Project
Energy	No impact	Less Than Significant	Less than Project

MLWDC: Mira Loma Women's Detention Center

Alternative 1A would not meet most of the basic Project objectives. Table 5-7 discusses the consistency of Alternative 1A with Project objectives.

**TABLE 5-7
EVALUATION OF THE PROJECT OBJECTIVES AND
ALTERNATIVE 1A: NO PROJECT/CONTINUATION OF EXISTING
OPERATIONS**

Objective	Consistency Analysis
A. To prioritize the on-site integration of gender-responsive female inmate education, treatment, and vocational training to reduce female inmate recidivism.	
1. To maximize system-wide efficiencies for County jails by providing a women's facility that meets the needs of the female population allowing for Gender Responsive Rehabilitation (GRR) model programming for eligible low- to medium-security female inmates.	Not Consistent. The CRDF was designed as a high-security male facility and does not have adequate space for the GRR model programming.
2. To provide a facility reflective of "real world" living that incorporates abundant natural light, opportunities for social interactions in landscaped open spaces, and defined functional areas to promote release readiness and community reintegration within a secured detention perimeter.	Not Consistent. The CRDF is not a campus-style facility reflective of "real world" living due to the high-security design of the building. There is very little outdoor space at the CRDF and it does not provide for adequate GRR program space, natural light, or opportunities for social interactions in landscaped open spaces.

**TABLE 5-7
EVALUATION OF THE PROJECT OBJECTIVES AND
ALTERNATIVE 1A: NO PROJECT/CONTINUATION OF EXISTING
OPERATIONS**

Objective	Consistency Analysis
3. To reduce recidivism through programming and development of a women's detention facility at a site with sufficient space to accommodate both campus-style inmate housing and support facilities for education and vocational training, implementing the best practices of Education Based Incarceration (EBI), within a secured detention perimeter.	Not Consistent. The CRDF is not a campus-style facility and cannot accommodate adequate support facilities for education and vocational training through the EBI program, which would result in the reduced ability to reduce recidivism.
B. To provide a detention facility with capacity for eligible low- to medium-security level female inmates.	
4. To permit re-allocation of detention facilities designed for higher security levels for male inmates and/or inmates with special security or other needs to serve the appropriate security-level populations.	Not Consistent. The CRDF was designed as a high-security male facility and its continued use would not permit re-allocation of County detention facilities designed for higher security levels for male inmates and/or inmates with special security needs.
5. To provide a facility with adequate capacity for a selected subset of the female inmate population based on security level and health status based on system trend analysis from data 2001-2013, which includes the beginning of the "AB 109" population of Low – Level (N3) Offender Population, and later state law changes.	Consistent. The CRDF has the space to accommodate the projected female inmate population.
6. To reduce inmate overcrowding according to the BSCC standards for rated capacity, as determined for the qualifying female inmate population.	Not Consistent. The retention of inmates at CRDF would not reduce overcrowding according to BSCC-standards for rated capacity because female inmates would remain in a higher-security facility while the MLDC property remained vacant.
C. To maximize the financial resources available to the County's correctional system for facilities serving female inmates.	
7. To avoid or minimize land acquisition and entitlement costs and to efficiently use existing County-owned physical assets.	Partially Consistent. Continued use of the CRDF would not involve land acquisition or entitlement costs, but would not efficiently use existing County-owned physical assets.
8. To avoid or minimize costs and delays to resolve easement and other land title clearances involving other parties' property interests.	Consistent. Alternative 1 would not involve easement or land title clearances.
9. To avoid new land use conflicts by prioritizing the re-use of currently or formerly operated County-owned property with detention facilities.	Consistent. Alternative 1 would avoid new land use conflicts.
10. To control the higher costs of new construction compared to the cost of renovation of existing facilities and the higher costs of maximum security construction compared to medium and low security detention facility construction by renovating and re-purposing existing facilities and infrastructure and/or designing separate low and medium security detention facilities where feasible.	Consistent. Alternative 1 would avoid costs of new construction.
11. To maximize the use of state grant funds from AB 900 and any other grant funds, including the maximization of the number of female inmate beds covered per grant.	Not Consistent. This alternative is not consistent with the County's grant application that was approved by the BSCC and would not allow for the use of AB 900 grant funds. No other grants are known to be available at this time.

**TABLE 5-7
EVALUATION OF THE PROJECT OBJECTIVES AND
ALTERNATIVE 1A: NO PROJECT/CONTINUATION OF EXISTING
OPERATIONS**

Objective	Consistency Analysis
12. To minimize the County's net cost to fund a female detention facility, including long-term operation and maintenance costs.	Not Consistent. Alternative 1 would not minimize the County's operation and maintenance costs because the inefficient placement of lower-security females within a higher-security facility would have higher operation and maintenance costs.

5.7.2 ALTERNATIVE 1B: NO PROJECT/PREDICTABLE ACTIONS

Section 15126.6(e)(3)(B) of the State CEQA Guidelines requires an EIR to identify and analyze the circumstance in which the Project does not proceed. Alternative 1B is required to discuss “the environmental effects of the property remaining in its existing state against environmental effects which would occur if the project is approved. If disapproval of the project under consideration would result in predictable actions by others, such as the proposal of some other project, this “no project” consequence should be discussed.”

It is predictable that if the Project did not proceed, that the County would eventually put the MLDC property to use in some form. Under this Alternative, the existing and future female inmate population would continue to be housed at the CRDF. It is unlikely that the County would allow the MLDC property to remain vacant for numerous years, resulting in the inefficient use of a County-owned asset. The County could choose to sell the MLDC property for redevelopment by another entity, choose to re-use the facility for other detention purposes, choose to demolish the facilities for County reuse for a non-detention facility purpose, or pursue other alternate scenarios of reuse. However, the alternate uses for the property if the Project is not approved is not reasonably foreseeable and would be speculative; therefore, no additional discussion of other possible scenarios is included in this alternatives analysis.

5.7.3 ALTERNATIVE 2: ALTERNATE LOCATION – NEW WOMEN'S FACILITY AT PITCHESS DETENTION CENTER

Alternative 2 proposes the construction of a new women’s detention facility on a 21-acre area on a vacant and undeveloped portion of the secured PDC. As previously discussed, this alternative was previously proposed by the County for consideration but was subsequently rejected by the Board in favor of the proposed Project (CEO 2013).

Alternative 2 would require the demolition and development of approximately 21 acres in a largely undeveloped and underutilized area of the PDC to allow the construction and operation of a new facility. The new PDC facility would provide a 1,156-bed low- to medium-security, rehabilitation-based, female inmate detention facility with a 26-bed medical clinic and appurtenant facilities, and a parking garage for staff. Approximately 324 new employees would be required, including approximately 34 new medical personnel and approximately 290 new custody officers. Exhibit 5-1, Alternative 2: Conceptual Design for a New Women’s Facility at Pitchess Detention Center, shows the preliminary conceptual design for the original proposal.

As shown in Exhibit 5-1, approximately 237,700 square feet (sf, i.e., 26 percent) of the site would be developed with buildings; approximately 105,000 sf (12 percent) would be developed with the 2-story parking garage; approximately 370,000 sf (41 percent) would be landscaped areas; and approximately 185,000 sf (21 percent) would be paved areas, including roadways and sidewalks.

Exercise Stations Along Interior Walking Trail



ARM SWING



Perimeter Fence

Rest Area with Bench



Site Cross Section



Back of Housing Unit with Garden and Perimeter Walking Trail



Existing Church



Source: LASD 2012

Alternative 2: Conceptual Site Plan for a New Women's Facility at Pitchess Detention Center

Exhibit 5-1

Mira Loma Women's Detention Center



Inmate housing would be provided in separate dormitories, along with nearby support facilities (e.g., kitchen/dining hall, clinic, classrooms, outdoor recreation areas, visitation areas, administration and staff areas, and parking areas). Structures would be built to meet the equivalent rating of a Leadership in Energy and Environmental Design (LEED) certification, and infrastructure improvements would be provided to serve individual buildings under this alternative. Similar to the Project, this alternative would provide program space for EBI and GRR.

Under Alternative 2, approximately 1,156 low- to medium-level security female inmates would be transferred from the CRDF to the new facility within the PDC, which is a reduction in capacity of approximately 28 percent compared to the proposed MLWDC Project. This reduced capacity to house all of the qualifying female inmate population under Alternative 2 would necessitate the remaining females to be at CRDF, thereby requiring CRDF to become a mixed male/female facility, decreasing the efficiency of re-allocating higher-security facilities to the overcrowded male inmate population. Alternative 2 would have a duplication of certain operations and staffing due to the need to operate and maintain two separate facilities for the same purpose. Maintaining female inmate housing at both PDC and CRDF would require duplication of medical services spaces to provide the specific medical needs of the female inmate population. As with the Project, no inmate bookings or releases would occur at the PDC.

Comparative Analysis of Environmental Impacts

Aesthetics

Alternative 2 would result in changes in visual quality associated with the construction of the new facility at the PDC. However, the PDC is not visible from public roadways due to distance from public roads and intervening trees, hills, and structures. Also, there are no sensitive receptors near the site for Alternative 2. Mitigation associated with the potential light spill-over onto nearby sensitive receptors from the Project would not be required.

Air Quality

As entirely new construction would be required for Alternative 2, construction emissions would be greater than the proposed MLWDC Project. However, there would be reduced demolition activities and short-term air quality impacts are expected to be less than South Coast Air Quality Management District (SCAQMD) thresholds for regional and local emissions for Alternative 2. Operational emissions would be reduced when compared to the proposed MLWDC due to fewer and shorter vehicle trips due to fewer employees and closer proximity to the County's urban center where most inmate visitors and service vendors are located. Also, there would be reduced potential for exposure to Valley Fever under this alternative due to its location outside of the Antelope Valley.

Biological Resources

Alternative 2 would have the potential to affect migratory birds, adjacent California sagebrush scrub, and a drainage channel that is considered jurisdictional by resource agencies. Implementation of mitigation for nesting birds and bat roosts, and for impacts to jurisdictional features would be required, similar to the proposed MLWDC Project. In addition, mitigation for potential impacts to California sagebrush scrub would be needed to reduce impacts to existing plant and animal habitats.

Cultural Resources

Alternative 2 would not affect historical resources but could impact unknown archaeological and paleontological resources, similar to the proposed MLWDC Project. Alternative 2 would have to implement the similar mitigation measures as the Project.

Geology and Soils

Alternative 2 would be exposed to site-specific geologic and seismic characteristics, including liquefaction potential. Compliance with the recommendations of the Geotechnical Evaluation for the site would be required, similar to the proposed MLWDC Project.

Greenhouse Gas Emissions

Construction-related GHG emissions under Alternative 2 would be greater than the Project due to the need to grade the site and construct an entirely new facility; however, long-term GHG emissions would be less due to shorter inmate transport trips, employee trips, and visitor trips. Additionally, the majority of the structures would be constructed to meet the equivalent rating of LEED certification, rather than only the new building construction greater than 10,000 sf with the Project.

Hazards and Hazardous Materials

Alternative 2 would involve hazardous materials use and hazardous waste generation during demolition and construction activities, similar to the proposed MLWDC Project. Mitigation for asbestos-containing materials and lead-based paint would be required for minor demolition, but the mitigation for underground storage tanks for the Project would not be required. The PDC is located within a Very High Fire Hazard Zone (CAL FIRE 2011) and compliance with fuel modification requirements in the County Fire Code would be required. Long-term hazardous materials use and hazardous waste generation during facility operations would be the same under this alternative as with the Project.

Hydrology and Water Quality

Alternative 2 is located within the 100-year floodplain and changes in hydrology that may occur would require mitigation (DWR 2015). Water use under this alternative would be provided by local groundwater wells that draw water from the Santa Clara River Valley Groundwater Basin. As Alternative 2 would be exposed to flood hazards associated with the 100-year floodplain and would be served by underlying groundwater resources, this alternative would have greater impacts on hydrology and groundwater than the Project.

Land Use and Planning

Alternative 2 proposes a new detention facility within PDC and would introduce the same land use as found in the surrounding area within the PDC property. No General Plan amendment or zone change would be needed and no division of established communities or conflict with land use plans, policies or programs would occur, as with the proposed MLWDC Project.

Noise

Construction activities under Alternative 2 would generate noise impacts, but the implementation of construction noise mitigation would reduce impacts on nearby sensitive receptors, as with the

Project. Operational noise impacts would be less than significant and similar to the proposed MLWDC Project.

Population and Housing

Alternative 2 would introduce a reduced number of inmates and employees to the PDC site. Any employment increases and associated indirect housing impacts that would be realized in the Antelope Valley would alternately be realized in the Santa Clarita Valley.

Public Services and Recreation

Alternative 2 would create similar demands for fire and police protection services from the County Fire Department and Sheriff's Department as the Project. With the provision of on-site educational and recreational facilities, no direct impacts on off-site schools, libraries, or parks would occur, as with the proposed MLWDC Project.

Transportation and Traffic

Alternative 2 would result in short-term construction-related traffic and long-term operational traffic impacts. New vehicle trips that would be added by this alternative to nearby intersections would represent a small number of the total trips given its location within an operational and active detention center. As inmate transport for bookings, releases, and court appearances would be shorter and bus trips could be combined with other PDC bus trips, traffic impacts under this alternative would be less than the impacts of the Project.

Utilities and Service Systems

Alternative 2 would require the construction and extension of water, sewer, and storm drain infrastructure to serve the new detention facility at the PDC. Similarly, new utility systems would be constructed at the Project site. Water supply would come from on-site wells under Alternative 2, while the proposed MLWDC Project would utilize groundwater and imported water supplies through the LACWWD40.

Energy

Under Alternative 2, the majority of the structures would be constructed to meet the equivalent rating of LEED certification, rather than only the new building construction greater than 10,000 sf with the Project. Also, the site for Alternative 2 would reduce vehicle miles traveled (VMT) because it is nearer to the County's urban center where most inmate visitors and service vendors are located. In addition, there are courtrooms in Santa Clarita that would shorten some inmate trips for court appearances. However, the PDC does not have access to the use of solar power available to the proposed MLWDC Project.

Alternative 2 Summary

The proposed MLWDC Project would not result in any significant impacts after mitigation. Alternative 2 would likely result in less than significant impacts after mitigation to the environment. Therefore, neither the proposed Project nor Alternative 2 would be considered environmentally superior when compared to the other, as summarized in Table 5-8 below.

**TABLE 5-8
SUMMARY OF ALTERNATIVE 2 IMPACTS**

Environmental Issue	Potential Significance of Alternative's Impacts	Summary of MLWDC Project Impacts	Alternative's Comparison to the Project After Mitigation
Aesthetics	Less Than Significant	Less Than Significant After Mitigation	Similar to Project
Air Quality	Less Than Significant After Mitigation	Less Than Significant	Similar to Project
Biological Resources	Less Than Significant After Mitigation	Less Than Significant After Mitigation	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	Similar to 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 After Mitigation	Less Than Significant	Similar to Project
Land Use and Planning	Less Than Significant	Less Than Significant	Similar to Project
Noise	Less Than Significant After Mitigation	Less Than Significant After Mitigation	Similar to Project
Population and Housing	Less Than Significant	Less Than Significant	Similar to Project
Public Services and Recreation	Less Than Significant	Less Than Significant	Similar to Project
Transportation and Traffic	Less Than Significant	Less Than Significant	Similar to Project
Utilities and Service Systems	Less Than Significant After Mitigation	Less Than Significant After Mitigation	Similar to Project
Energy	Less Than Significant	Less Than Significant	Similar to Project
MLWDC: Mira Loma Women's Detention Center			

As summarized in Table 5-8 above, Alternative 2 would result in a similar level of environmental impacts when compared to the proposed MLWDC Project, but would have increased impacts for hydrology because the site is located within a 100-year floodplain. This alternative would partially meet most of the Project objectives, as discussed below in Table 5-9.

**TABLE 5-9
EVALUATION OF THE PROJECT OBJECTIVES AND ALTERNATIVE 2:
ALTERNATE LOCATION – NEW WOMEN'S FACILITY AT PDC**

Objective	Consistency Analysis
A. To prioritize the on-site integration of gender-responsive female inmate education, treatment, and vocational training to reduce female inmate recidivism.	
1. To maximize system-wide efficiencies for County jails by providing a women's facility that meets the needs of the female population allowing for Gender Responsive Rehabilitation (GRR) model programming for eligible low- to medium-security female inmates.	Partially Consistent. Alternative 2 would allow for the construction of a female detention facility at PDC with space for the GRR model programming. However, there would be a 28% reduction in bed capacity (448 fewer beds than the MLWDC Project); therefore, systemwide efficiencies would not be maximized. Additionally, the CRDF would become a mixed male/female facility, which would further reduce staffing/operational efficiencies within the LASD jail system due to the split female inmate population.
2. To provide a facility reflective of "real world" living that incorporates abundant natural light, opportunities for social interactions in landscaped open spaces, and defined functional areas to promote release readiness and community reintegration within a secured detention perimeter.	Partially Consistent. Alternative 2 would include the construction of a new facility with abundant natural light and opportunities for social interactions in landscaped open spaces, as well as the provision of program space for GRR. However, 28% fewer qualifying female inmates would be served at the PDC, while the remaining population would be at the CRDF, which does not meet the standards set forth in this objective.
3. To reduce recidivism through programming and development of a women's detention facility at a site with sufficient space to accommodate both campus-style inmate housing and support facilities for education and vocational training, implementing the best practices of Education Based Incarceration (EBI), within a secured detention perimeter.	Partially Consistent. A new facility with campus-style inmate housing and support facilities and program space for EBI could be provided at PDC. However, 28% fewer women would be accommodated at the PDC campus; therefore, efforts to reduce recidivism through EBI programs would be less effective. The remaining population would be at CRDF, and CRDF does not meet the standards set forth in this objective.
B. To provide a detention facility with capacity for eligible low- to medium-security level female inmates.	
4. To permit re-allocation of detention facilities designed for higher security levels for male inmates and/or inmates with special security or other needs to serve the appropriate security-level populations.	Partially Consistent. The relocation of 1,156 female inmates from CRDF to PDC would partially allow for the re-use of the CRDF as a high-security male facility, thus creating a mixed male/female facility at CRDF.
5. To provide a facility with adequate capacity for a selected subset of the female inmate population based on security level and health status based on system trend analysis from data 2001-2013, which includes the beginning of the "AB 109" population of Low – Level (N3) Offender Population, and later state law changes.	Not Consistent. The PDC design does not have the land area to provide a 1,604-bed facility while maintaining a campus-style housing reflective of "real world" living.
6. To reduce inmate overcrowding according to the BSCC standards for rated capacity, as determined for the qualifying female inmate population.	Partially Consistent. The redevelopment of PDC would reduce inmate overcrowding, but would not accommodate the 1,604 beds required to serve the qualifying female inmate population.

**TABLE 5-9
EVALUATION OF THE PROJECT OBJECTIVES AND ALTERNATIVE 2:
ALTERNATE LOCATION – NEW WOMEN'S FACILITY AT PDC**

Objective	Consistency Analysis
C. To maximize the financial resources available to the County's correctional system for facilities serving female inmates.	County's correctional system for facilities serving female inmates.
7. To avoid or minimize land acquisition and entitlement costs and to efficiently use existing County-owned physical assets.	Partially Consistent. The construction of a facility at the PDC would not involve land acquisition or entitlement costs. However, it would not utilize existing County-owned facilities. A new facility would be constructed while other County assets (i.e., the MLDC site) would remain vacant. The creation of a male/female facility at the CRDF would divide resources for the qualifying female population and would not be the most efficient use of County-owned physical assets given the availability of MLDC, which could accommodate 28% more female inmates.
8. To avoid or minimize costs and delays to resolve easement and other land title clearances involving other parties' property interests.	Not Consistent. Alternative 2 would require land title clearances that conflict with an existing mineral rights lease for land within the PDC site property boundary.
9. To avoid new land use conflicts by prioritizing the re-use of currently or formerly operated County-owned property with detention facilities.	Consistent. Alternative 2 would allow reuse of a currently County-owned and operated detention facility.
10. To control the higher costs of new construction compared to the cost of renovation of existing facilities and the higher costs of maximum security construction compared to medium and low security detention facility construction by renovating and re-purposing existing facilities and infrastructure and/or designing separate low and medium security detention facilities where feasible.	Not Consistent. Alternative 2 would incur greater costs due to the construction of an entirely new facility at PDC with a rating equivalent to LEED certification. There would be additional cost inefficiencies associated with splitting the eligible female population between the PDC and the CRDF.
11. To maximize the use of state grant funds from AB 900 and any other grant funds, including the maximization of the number of female inmate beds covered per grant.	Not Consistent. This alternative is not consistent with the County's grant application that was approved by the BSCC and would not allow for the use of AB 900 grant funds. No other grants are known to be available at this time.
12. To minimize the County's net cost to fund a female detention facility, including long-term operation and maintenance costs.	Not Consistent. A portion of the qualifying female inmate population would still need to be served at the CRDF. There would be additional cost inefficiencies associated with splitting the eligible female population between the PDC and the CRDF.

As shown, Alternative 2 would partially meet most of the Project objectives. In summary, Alternative 2 would not avoid conflicts due to land easements and title clearances; would not allow for the use of financial resources (AB 900 grants); would not avoid costs associated with new construction; would not allow for the full and efficient re-allocation of detention facilities designed for higher security levels; and would require the division of services for female inmates between the CRDF and the PDC campuses, while the MLDC facility remains vacant.

5.7.4 ALTERNATIVE 3: ALTERNATE LOCATION – NEW ANNEX AT CENTURY REGIONAL DETENTION FACILITY

Alternative 3 proposes to retain the female inmate population at CRDF and construct a new annex to provide building space for the Education Based Incarceration (EBI) and Gender Responsive Rehabilitation (GRR) model programming. This alternative reflects the grant application proposal

submitted by the County to the BSCC under SB 863, Adult Local Criminal Facilities Construction Financing.

The expansion potential at the CRDF is limited because the site is largely developed with buildings and parking areas, and there is limited available land area at or near the site for lateral expansion. As shown in Exhibit 5-2, Alternative 3: Aerial Photograph of the CRDF, the site for the facility is almost fully developed and surrounded by existing land uses, with no vacant land nearby available for expansion. CRDF has both dorm and high security single/double cell configurations. The cell configuration limits a communal environment and programming opportunities. In order to maintain the female population at the CRDF and to incorporate the GRR model programming, EBI programs, and recreational opportunities, Alternative 3 proposes to construct a new Treatment and Programming Annex Facility and outdoor visitation area at the courtyard area of the CRDF.

The proposed Annex Facility would be a three-story building with 25,000 square feet of floor area to be constructed in the landscaped area between existing buildings. The facility would include six treatment rooms, four classrooms, and support areas to accommodate staff and health professionals involved in the treatment and provision of medical, mental health, and substance abuse services, as well as provide educational and vocational training to inmates. The facility would also include space for contact visiting; a rooftop recreation area; and a 17,500-square-foot outdoor visiting area at the center of the CRDF. Construction of the new Annex Facility and outdoor visitation area could be conducted while CRDF remains occupied by the inmate population and no temporary displacement of inmates would be required.

The expansion of the CRDF through the construction of the Annex Facility would avoid the creation of environmental impacts at the MLDC site, but would result in environmental impacts at the CRDF. An overview comparison of the environmental impacts associated with the expansion and continued use of the CRDF for female inmates in comparison to the environmental impacts of the proposed MLWDC Project are discussed by issue area below.

Comparative Analysis of Environmental Impacts

Aesthetics

Alternative 3 would have new visual impacts associated with the new building but the height of the Annex Facility would be lower than the height of existing buildings at CRDF. Because the CRDF is located in a highly urbanized area adjacent to the I-105, it is not anticipated that the new building would be considered a significant visual impact. Alternative 3 would eliminate the need for mitigation regarding potential spill-over of lighting onto adjacent sensitive receptors, as the CRDF is a currently occupied facility.

Air Quality

Because construction would be limited to the new Annex Facility and outdoor visitation area, construction emissions would be less than the proposed MLWDC Project. There would be reduced demolition activities and short-term air quality impacts are expected to be less than SCAQMD thresholds for regional and local emissions for Alternative 3. No increase in inmates or staffing would occur under this alternative. Thus, no new operational emissions would occur. Also, operational emissions would be reduced when compared to the proposed MLWDC Project due to shorter vehicle trips and closer proximity to the County's urban center where most inmate visitors and service vendors are located. Alternative 3 would avoid the potential for Valley Fever exposure due to its location outside of the Antelope Valley and the reduced opportunities for creating fugitive dust (i.e., reduced soil disturbance).

Property Boundary

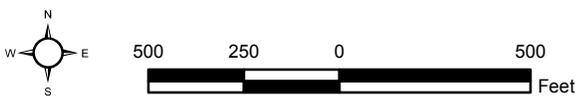


Aerial Source: LAR-IAC 2011

D:\Projects\COLACEO\001\WXD\EIR\Ex_Alt3_Aerial_20151023.mxd

Alternative 3: Aerial Photograph of CRDF Mira Loma Women's Detention Center

Exhibit 5-2



Biological Resources

Alternative 3 would have limited impacts with the removal of ornamental landscaping and turf grass at the CRDF, with no impacts to any sensitive species or biological communities. Impacts and mitigation at the MLWDC site for impacts to nesting birds, roosting bats and jurisdictional resources would be eliminated under Alternative 3.

Cultural Resources

No impact on historic resources would occur because the facility was built in 1989 and is not considered a historical structure. Alternative 3 would involve ground disturbance but the site has been heavily disturbed by construction of the CRDF. Potential impacts to known and unknown historical, archaeological, and paleontological resources would be avoided, and the mitigation measures required for the proposed MLWDC would be eliminated.

Geology and Soils

Alternative 3 would involve limited earthwork and would have to comply with the recommendations of the site-specific geotechnical investigation for this alternative. As the CRDF contains structures that are larger and taller than the proposed building, this alternative is not expected to generate impacts related to any major geotechnical or soil conditions.

Greenhouse Gas Emissions

Construction-related GHG emissions under Alternative 3 would be less than the proposed MLWDC Project due to the reduced construction activity, and long-term GHG emissions would be less due to shorter inmate transport trips, employee trips, and visitor trips. Additionally, the new Annex Facility would be larger than 10,000 sf and thus, would have to be constructed to meet the equivalent rating of LEED certification.

Hazards and Hazardous Materials

Hazardous materials use during construction would be conducted in compliance with existing regulations. Expansion of the CRDF would eliminate the need to mitigate for existing hazards on the MLDC site, including potential exposure to asbestos and/or lead-based paint because the structure was constructed in 1995. There would be hazards associated with construction within an occupied facility, which would likely require mitigation to ensure the safety of the inmates and staff housed at CRDF.

Hydrology and Water Quality

The site is not located in a flood hazard area and changes in existing drainage patterns, storm drainage, percolation rates, runoff volumes, or other hydrologic conditions would be limited to the any new impervious surfaces created by the new building and outdoor visitation area. Because the CRDF site is largely developed and served by an existing storm drainage system, impacts would be less than significant, as with the proposed MLWDC Project..

Land Use and Planning

Alternative 3 would not result in any changes to existing land uses, zoning, land use designations, or land use compatibility. No General Plan amendment or zone change would be needed and no division of established communities or conflict with land use plans, policies, or programs would occur, as with the proposed MLWDC Project.

Noise

Construction activities under Alternative 3 would generate noise impacts to the inmates housed at the CRDF facility, but the implementation of construction noise mitigation would reduce impacts on nearby sensitive receptors, as with the MLWDC Project. Operational noise impacts would be less than significant and less than those associated with the proposed MLWDC Project because the CRDF is an operating facility.

Population and Housing

Alternative 3 would not create any new jobs, nor would it involve the potential indirect development of housing that may increase the resident population of the Lynwood area. It would not indirectly contribute to the economic growth in the area, unlike the MLWDC Project. While temporary construction jobs would be created under this Alternative, no new permanent jobs would be created at CRDF.

Public Services and Recreation

No increase in bed capacity will be created by Alternative 3. Thus, this alternative would not change the demand for public services at or near the CRDF and would not create new impacts related to public services or recreation.

Transportation and Traffic

Construction-related traffic would be generated with Alternative 3, as with the proposed MLWDC Project. However, vehicle trips will be less due to the limited construction proposed under this alternative. Alternative 3 would not involve any long-term changes to the existing roadways, traffic volumes, or operating levels of service near CRDF because no new population would be served or housed. Also, no increase in staffing at CRDF would occur under this alternative. This alternative would not generate new vehicle trips over those currently generated by the CRDF, and keeping the female inmates at the CRDF would eliminate the introduction of new traffic into the Antelope Valley and the MLDC area specifically.

Utilities and Service Systems

Alternative 3 would create new demands for utilities and service systems to serve the new building and outdoor visitation area at CRDF but no increase in inmates or staffing would occur under this alternative. Thus, implementation of this alternative is not expected to impact existing utility infrastructure or require new water supplies to serve the Project. Mitigation associated with new water supply sources for the proposed MLWDC Project would not be required.

Energy

Alternative 3 would not lead to demands for new energy resources or result in increases in long-term electrical or natural gas consumption or transportation energy use at the Project site, with the exception of the electricity required to serve the new building. Under Alternative 3, the new building would be constructed to meet the equivalent rating of LEED certification, because it is greater than 10,000 square feet. Continued use of the CRDF by female inmates would reduce VMT because it is nearer to the County's urban center where most inmate visitors and service vendors are located. However, the CRDF does not have access to the use of solar power that is available to the proposed MLWDC Project.

Alternative 3 Summary

The proposed MLWDC Project would not result in any significant impacts after mitigation. Alternative 3 would likely result in less than significant impacts to the environment after mitigation. Therefore, neither the proposed Project nor Alternative 3, would be considered environmentally superior when compared to the other, as summarized in Table 5-10 below.

**TABLE 5-10
SUMMARY OF ALTERNATIVE 3 IMPACTS**

Environmental Issue	Potential Significance of Alternative's Impacts	Summary of MLWDC Project Impacts	Compared to Impacts of Project After Mitigation
Aesthetics	Less Than Significant	Less Than Significant After Mitigation	Similar to Project
Air Quality	Less Than Significant	Less Than Significant	Similar to Project
Biological Resources	Less Than Significant	Less Than Significant After Mitigation	Similar to Project
Cultural Resources	Less Than Significant	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	Similar to 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	No impact	Less Than Significant	Less than Project
Noise	Less Than Significant After Mitigation	Less Than Significant After Mitigation	Similar to Project
Population and Housing	No impact	Less Than Significant	Less than Project
Public Services and Recreation	No impact	Less Than Significant	Less than Project
Transportation and Traffic	Less Than Significant	Less Than Significant	Similar to Project
Utilities and Service Systems	Less Than Significant	Less Than Significant After Mitigation	Similar to Project
Energy	Less Than Significant	Less Than Significant	Similar to Project
MLWDC: Mira Loma Women's Detention Center			

As summarized in Table 5-10 above, Alternative 3 would result in no impacts on population and housing and public services and recreation and a similar level of environmental impacts on all other issues when compared to the proposed MLWDC Project. This alternative would meet or partially meet most of the Project Objectives, as discussed below in Table 5-11.

**TABLE 5-11
EVALUATION OF THE PROJECT OBJECTIVES AND ALTERNATIVE 3:
ALTERNATE LOCATION – NEW ANNEX AT CRDF**

OBJECTIVE	CONSISTENCY ANALYSIS
A. To prioritize the on-site integration of gender-responsive female inmate education, treatment, and vocational training to reduce female inmate recidivism.	
1. To maximize system-wide efficiencies for County jails by providing a women's facility that meets the needs of the female population allowing for Gender Responsive Rehabilitation (GRR) model programming for eligible low- to medium-security female inmates.	Not Consistent. The CRDF was designed as a high-security male facility. It would be feasible to renovate and expand the building to incorporate some but not all needed space for the GRR model programming. This alternative would also not accommodate the County's female inmate population because no additional cells would be constructed to alleviate overcrowding. The facility would still not be designed for low- to medium-security female inmates and would therefore not maximize efficiencies for the County jail system.
2. To provide a facility reflective of "real world" living that incorporates abundant natural light, opportunities for social interactions in landscaped open spaces, and defined functional areas to promote release readiness and community reintegration within a secured detention perimeter.	Not Consistent. There is no available land area at the CRDF to create a campus-style facility reflective of "real world" living. The facility is designed for high-security male inmates. There is very limited outdoor space at the CRDF and the addition of the new building would provide program space, but would reduce natural light and landscaped open space areas for social interaction or recreation. This alternative would be less effective at promoting release readiness for community reintegration.
3. To reduce recidivism through programming and development of a women's detention facility at a site with sufficient space to accommodate both campus-style inmate housing and support facilities for education and vocational training, implementing the best practices of Education Based Incarceration (EBI), within a secured detention perimeter.	Partially Consistent. The addition of the new building would provide program space for GRR and EBI, but the lack of available land area would not provide all needed program space and this alternative would not accommodate campus-style inmate housing and support facilities.
B. To provide a detention facility with capacity for eligible low- to medium-security level female inmates.	
4. To permit re-allocation of detention facilities designed for higher security levels for male inmates and/or inmates with special security or other needs to serve the appropriate security-level populations.	Not Consistent. The CRDF was designed as a high-security male facility and its renovation and continued use as a female inmate facility would not permit re-allocation of County detention facilities designed for higher security levels for male inmates and/or inmates with special security needs.
5. To provide a facility with adequate capacity for a selected subset of the female inmate population based on security level and health status based on system trend analysis from data 2001-2013, which includes the beginning of the "AB 109" population of Low – Level (N3) Offender Population, and later state law changes.	Not Consistent. The CRDF cannot accommodate the 1,604 female inmate population.
6. To reduce inmate overcrowding according to the BSCC standards for rated capacity, as determined for the qualifying female inmate population.	Not Consistent. Keeping the inmates at the CRDF would have no impact on reducing inmate overcrowding.

**TABLE 5-11
EVALUATION OF THE PROJECT OBJECTIVES AND ALTERNATIVE 3:
ALTERNATE LOCATION – NEW ANNEX AT CRDF**

OBJECTIVE	CONSISTENCY ANALYSIS
C. To maximize the financial resources available to the inmates.	County's correctional system for facilities serving female inmates.
7. To avoid or minimize land acquisition and entitlement costs and to efficiently use existing County-owned physical assets.	Partially Consistent. Alternative 3 would not involve land acquisition or entitlement costs. However, it would not promote the efficient use of County-owned assets because it would not re-use existing vacant County-owned assets to allow for the re-allocation of detention facilities designed for higher security levels of male inmates.
8. To avoid or minimize costs and delays to resolve easement and other land title clearances involving other parties' property interests.	Consistent. Expansion of the CRDF through a new building and outdoor visitation area would not involve easement or land title clearances.
9. To avoid new land use conflicts by prioritizing the re-use of currently or formerly operated County-owned property with detention facilities.	Consistent. Expansion of the CRDF would use a currently County-owned and operated detention facility.
10. To control the higher costs of new construction compared to the cost of renovation of existing facilities and the higher costs of maximum security construction compared to medium and low security detention facility construction by renovating and re-purposing existing facilities and infrastructure and/or designing separate low and medium security detention facilities where feasible.	Partially Consistent. Expansion of the CRDF would partially avoid costs of constructing a new prison facility, but it would not provide for a separate low- to medium-security detention center.
11. To maximize the use of state grant funds from AB 900 and any other grant funds, including the maximization of the number of female inmate beds covered per grant.	Partially Consistent. This alternative is not consistent with the County's grant application that was approved by the BSCC and would not allow for the use of AB 900 grant funds. However, an SB 863 grant application has been submitted that could provide funds for this alternative.
12. To minimize the County's net cost to fund a female detention facility, including long-term operation and maintenance costs.	Partially Consistent. Adding a new building would allow the CRDF to operate its programs more efficiently with minimal increase in operating costs and no staffing increase. However, operating a higher-security facility is more expensive than operating a low- to medium-security facility. Therefore, long-term operations and staffing costs would be more expensive.

Under Alternative 3, the on-site integration of gender-responsive female inmate education, treatment, and vocational training at the CRDF would be partially accommodated by the new building and outdoor visitation area. However, this alternative would not provide campus-style inmate housing or outdoor recreational opportunities and sport facilities. It would not create new capacity within the County jail system to alleviate overcrowding and it would not allow for the redistribution of County detention facility assets to serve the appropriate security level inmate population. Additionally, Alternative 3 would continue an inefficient system of operating a high-security facility for low to-medium security inmates, and would not allow for the use of AB 900 grant funds.

5.7.5 ALTERNATIVE 4: REDUCED MIRA LOMA WOMEN'S DETENTION CENTER CAPACITY – NO EXPANSION

Alternative 4 proposes for the reuse of the MLDC site with no expansion of capacity and no new building construction. The MLDC closed in 1993 as a County facility and remained closed until it reopened in 1997 as a federal facility to accommodate the Immigration and Customs Enforcement (ICE) Bureau. The BSCC establishes the minimum standards for local adult and juvenile detention facilities and conducts biennial inspections for compliance. In order to repurpose the MLDC as a County facility, an inspection was conducted in September 2012 by the BSCC to determine compliance with the *California Code of Regulations*.

The following improvements to MLDC were mandated by the inspection in order to open MLDC with a BSCC-rated capacity of 1,040 (LASD 2012):

- Add additional seating to each barrack
- One toilet upgrade per administrative segregation cell.
- Flush mount all fire sprinklers, smoke alarms, and vents in administrative segregation cells.
- Add incident alarm buttons to each barrack.

The County Department of Public Health (DPH) inspected MLDC on October 2, 2012, and requested numerous kitchen upgrades, including but not limited to installation of new exhaust hoods, floor repairs, secure/enclose electrical conduits, repair tiles, replace sinks and stoves, replace refrigerators/freezers, repair food storage rooms, and provide new mop/sink area. Dorm restrooms also required repair, including floor and wall tile repairs, renovate shower ceilings, fix slow draining pipes, and replace missing grout. However, it was noted these upgrades would not preclude MLDC from opening as long as progress was made toward compliance (LASD 2012).

Additional LASD-required upgrades would be needed for Barracks E and F, which had not housed inmates in several years. A new heating and air conditioning system would be required, along with replacement tiles for the showers and new paint.

LASD no longer has the ability to open MLDC at a 1,040 bed capacity without further BSCC approval due to the passage of time and the fact that MLDC is no longer an active or operational facility. However, the improvements discussed above are still relevant for the purposes of determining what would be required to improve MLDC to make it functional for re-opening at an 880 bed capacity.

Other LASD-required improvements and renovations would generally include measures to make the facility fully operational, such as repairs to and/or replacement of the Central Plant (i.e., steam generation) with either a new central plant or package units at the various buildings; back-up energy generators; development of state of the art communications standards through a central control; improvements to the kitchen building; and new water supplies and infrastructure connections to LACWWD40 (LASD 2015a). These improvements would allow for the MLDC to accommodate 880 beds with no substantive new building construction or changes to existing facilities.

Accordingly, the site would not need to be brought into compliance with current drainage and water quality standards (e.g., low impact development [LID] and Standard Urban Stormwater Mitigation Plan [SUSMP] requirements), because the renovations would only involve repairs to make the site operational, rather than renovations to accommodate an expansion that would

mandate new permitting requirements. Some of the proposed GRR model programming could be accommodated on the re-opened MLDC property within the existing facilities, but at a less comprehensive level, and some programs would not be instituted at all, including the culinary arts program.

Under Alternative 4, approximately 880 low- to medium-level security female inmates would be transferred from the CRDF to the MLDC, which is a reduction in capacity of approximately 55 percent compared to the proposed MLWDC Project. This 55-percent reduction in the capacity under Alternative 4 to serve qualifying female inmate population would necessitate the remaining females to remain at CRDF, thereby requiring CRDF to become a mixed male/female facility, decreasing the efficiency of services to female inmates and reducing the effectiveness of re-allocating higher-security facilities to the overcrowded male inmate population.

MLDC does not contain any classroom space in its current configuration to accommodate any EBI or GRR programming. The LASD standard for program space is 15 square feet (sf) for 80% of the female inmate population. However, only half of the inmate population would be in programming at any one time; therefore, the ideal programming space at MLDC would be approximately 8,250 sf ($[(880 \text{ inmates} \times 80\%)/2]$). The CRDF contains 4 classrooms (approximately 2,730 sf), which is insufficient to serve the 724 female inmates, which would require approximately 4,344 sf of program space at CRDF ($[724 \times 80\%]/2$). Therefore, Alternative 4 would not provide the programming space necessary to serve the female inmate population at either facility. For comparison, the proposed MLWDC Project includes approximately 20,800 interior program space (Buildings 3, 4, 6, and 25) and 63,400 sf of exterior program space for inmates.

Alternative 4 would have a duplication of certain operations and staffing due to the need to operate and maintain two separate facilities for the same purpose. Maintaining female inmate housing at both CRDF and MLDC would require duplication of medical services spaces to provide the specific medical needs of the female inmate population.

Comparative Analysis of Environmental Impacts

Aesthetics

Alternative 4 would not result in changes to the visual quality or aesthetics of the MLDC site because improvements would be largely internal to the existing structures. Mitigation associated with the potential light spill-over onto nearby sensitive receptors from the proposed MLWDC Project would still be required to account for the transition from the vacant facility to an active detention center.

Air Quality

Alternative 4 would have substantially reduced air quality impacts for short-term construction due to the elimination of demolition and new building construction, and reduced trenching for utilities. Operational emissions would be similar to the proposed MLWDC Project because, although employee and visitation trips would be reduced due to the reduced MLWDC inmate population, there would be operational inefficiencies associated with operating both the MLDC and the CRDF for female inmates because staff travel would be divided between the two facilities and additional employees would likely be needed to staff the two separate female programs.

Biological Resources

Alternative 4 would not disturb existing plant or animal species or their habitats because no buildings or structures would be demolished and no areas containing trees or landscape would

be removed. Mitigation associated with nesting birds and bat roosts would likely not be required; however, impacts to jurisdictional resources due to the water line connection to West Avenue I would be required.

Cultural Resources

Alternative 4 would not involve substantial ground disturbance or excavations that could disturb known or unknown historical, archaeological, and paleontological resources. However, mitigation associated with archaeological and paleontological impacts for the proposed MLWDC Project would still be required due to the trenching for the water line connection to West Avenue I.

Geology and Soils

Alternative 4 would not require geotechnical investigations or additional requirements because no demolition or new facility construction would occur.

Greenhouse Gas Emissions

Alternative 4 would have substantially reduced GHG impacts for short-term construction due to the elimination of demolition and new building construction, and reduced trenching for utilities. Long-term operational impacts would also be reduced at the MLDC site due to a smaller on-site female inmate population, decreased program amenities and operations, and decreased worker and visitor traffic. However, more vehicle trips would be generated by the greater number of employees needed to staff the two separate female facilities at MLDC and the CRDF. No structures would meet the equivalent rating of LEED certification, although the MLWDC facility would be able to use the solar energy from the adjacent solar energy facility.

Hazards and Hazardous Materials

Alternative 4 would not lead to demolition or construction activities that may encounter or utilize hazardous materials or wastes. Mitigation associated with hazards (including underground storage tanks, lead-based paint, and asbestos) for the proposed MLWDC Project would still be required if interior renovations would have contact with these substances.

Hydrology and Water Quality

Alternative 4 would not involve any changes in existing drainage patterns, storm drainage, percolation rates, runoff volumes, or other hydrologic conditions due to the elimination of demolition and new building construction. There would be new sources of urban runoff and increases in storm water pollutants due to the re-opening of the MLWDC; however, Alternative 4 would not be required to incorporate current drainage and water quality standards (e.g., LID and SUSMP requirements). Water sources would change from County-owned groundwater well sources in the Antelope Valley to LACWWD40 sources.

Land Use and Planning

Alternative 4 would not result in any changes to existing land uses, zoning, land use designations, or land use compatibility at the MLWDC. No division of established communities or conflict with land use plans, policies or programs would occur, similar to the proposed MLWDC Project.

Noise

Alternative 4 would not result in new construction or building rehabilitation that could adversely impact adjacent sensitive receptors. Mitigation for short-term construction noise for the proposed MLWDC Project would not be required. New sources of long-term vehicle and stationary noise sources would be introduced to the Project site due to the re-opening of the MLWDC.

Population and Housing

Alternative 4 would likely require more employees to account for the operation of two separate facilities and associated inefficiencies due to operating two separate female programs. However, this increase would be unlikely to alter the employment effects for the region when compared to the proposed MLWDC Project. Alternative 4 would create fewer jobs in the Lancaster area and fewer potential indirect development of housing that may increase the resident population of Lancaster area.

Public Services and Recreation

Alternative 4 would create demands for fire and police protection services from the County Fire Department and LASD at two separate locations. Also, staffing redundancies for operating two female facilities would lead to greater demands for on-site LASD services. With the provision of on-site educational and recreational facilities at both facilities, no direct impacts on off-site schools, libraries, or parks would occur.

Transportation and Traffic

Alternative 4 would result in short-term construction-related traffic and long-term operational traffic impacts at MLDC. Traffic would be reduced when compared to the proposed Project due to the decreased inmate, employee, and visitor population. The CRDF is nearer the Inmate Reception Center (IRC) where bookings and releases would occur and the County's urban center where most inmate households and potential on-site employees reside. Therefore, overall VMT would likely be reduced.

Utilities and Service Systems

Alternative 4 would create new demands for utilities and service systems at the MLDC site, although demands would be decreased due to the reduced inmate population and LASD staff when compared to the proposed MLWDC Project. LACWWD40 would provide potable water supplies to serve the Project, as with the proposed MLWDC Project, although quantities would be reduced accordingly. Mitigation associated with new water supply sources for the proposed MLWDC Project would still be required.

Energy

Reuse of existing buildings under Alternative 4 would not be not required to achieve LEED certification or equivalent. The CRDF is nearer the IRC where bookings and releases would occur and the County's urban center where most inmate households and potential on-site employees reside. Therefore, overall VMT would likely be reduced. However, with the operation of two separate facilities, use of less energy-efficient housing, and inefficiencies in staffing and operations under Alternative 4, it is anticipated energy demands would be similar to the proposed MLWDC Project.

Alternative 4 Summary

The proposed MLWDC Project would not result in any significant impacts after mitigation. Alternative 4 would likely result in less than significant impacts after mitigation to the environment. Therefore, neither the proposed Project nor Alternative 4 would be considered environmentally superior when compared to the other, as summarized in Table 5-12 below.

**TABLE 5-12
SUMMARY OF ALTERNATIVE 4 IMPACTS**

Environmental Issue	Potential Significance of Alternative's Impacts	Summary of MLWDC Project Impacts	Compared to Impacts of Project After Mitigation
Aesthetics	Less Than Significant After Mitigation	Less Than Significant After Mitigation	Less than Project
Air Quality	Less Than Significant	Less Than Significant	Less than Project
Biological Resources	Less Than Significant After Mitigation	Less Than Significant After Mitigation	Less than Project
Cultural Resources	Less Than Significant After Mitigation	Less Than Significant After Mitigation	Less than Project
Geology and Soils	Less Than Significant	Less Than Significant	Less than 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	Less than Project
Hydrology and Water Quality	Less Than Significant	Less Than Significant	Less than Project
Land Use and Planning	Less Than Significant	Less Than Significant	Less than Project
Noise	Less Than Significant	Less Than Significant After Mitigation	Less than Project
Population and Housing	Less Than Significant	Less Than Significant	Less than Project
Public Services and Recreation	Less Than Significant	Less Than Significant	Less than Project
Transportation and Traffic	Less Than Significant	Less Than Significant	Less than Project
Utilities and Service Systems	Less Than Significant After Mitigation	Less Than Significant After Mitigation	Less than Project
Energy	Less Than Significant	Less Than Significant	Less than Project
MLWDC: Mira Loma Women's Detention Center			

As summarized in Table 5-12 above, Alternative 4 would result in a similar level of environmental impacts when compared to the proposed MLWDC Project. This alternative would meet or partially meet most of the Project objectives, as discussed below in Table 5-13.

**TABLE 5-13
EVALUATION OF THE PROJECT OBJECTIVES AND ALTERNATIVE 4 –
REDUCED MLWDC CAPACITY – NO EXPANSION**

Objective	Consistency Analysis
A. To prioritize the on-site integration of gender-responsive female inmate education, treatment, and vocational training to reduce female inmate recidivism.	
1. To maximize system-wide efficiencies for County jails by providing a women's facility that meets the needs of the female population allowing for Gender Responsive Rehabilitation (GRR) model programming for eligible low- to medium-security female inmates.	Partially Consistent. The reuse of the MLDC site would allow for some of the proposed GRR model programming to be accommodated within the existing facilities, but at a less comprehensive level, and some programs would not be instituted at all (e.g., the culinary arts program). However, there would be a 55% reduction in bed capacity (724 fewer beds than the MLWDC Project); therefore, systemwide efficiencies would not be maximized. Additionally, CRDF would become a mixed male/female facility, which would further reduce staffing/operational efficiencies within the LASD jail system due to the split female inmate population.
2. To provide a facility reflective of "real world" living that incorporates abundant natural light, opportunities for social interactions in landscaped open spaces, and defined functional areas to promote release readiness and community reintegration within a secured detention perimeter.	Partially Consistent. Alternative 4 would provide a campus-style facility reflective of "real world" living at the MLWDC. However, 55% fewer qualifying female inmates would be served at the MLWDC, while the remaining population would be at CRDF. CRDF does not meet the standards set forth in this objective.
3. To reduce recidivism through programming and development of a women's detention facility at a site with sufficient space to accommodate both campus-style inmate housing and support facilities for education and vocational training, implementing the best practices of Education Based Incarceration (EBI), within a secured detention perimeter.	Partially Consistent. MLWDC would provide for campus-style inmate housing and support facilities and program space for EBI could be provided at MLWDC, with reduced physical capacity for programs. However, fewer women would be accommodated at the MLWDC campus; therefore, efforts to reduce recidivism through EBI programs would be less effective. The remaining population would be at the CRDF, which does not meet the standards set forth in this objective.
B. To provide a detention facility with capacity for eligible low- to medium-security level female inmates.	
4. To permit re-allocation of detention facilities designed for higher security levels for male inmates and/or inmates with special security or other needs to serve the appropriate security-level populations.	Partially Consistent. The relocation of 880 female inmates from CRDF to MLDC would partially allow for the re-use of the CRDF as a high-security male facility, thus, creating a mixed male/female facility at the CRDF.
5. To provide a facility with adequate capacity for a selected subset of the female inmate population based on security level and health status based on system trend analysis from data 2001-2013, which includes the beginning of the "AB 109" population of Low – Level (N3) Offender Population, and later state law changes.	Not Consistent. The MLDC does not have the existing structures to provide a 1,604-bed facility that would house all low- and medium-security female inmates.
6. To reduce inmate overcrowding according to the BSCC standards for rated capacity, as determined for the qualifying female inmate population.	Partially Consistent. The renovation of the MLDC site would reduce inmate overcrowding by 880 beds, but would not accommodate the 1,604 beds required to serve the qualifying female inmate population.

**TABLE 5-13
EVALUATION OF THE PROJECT OBJECTIVES AND ALTERNATIVE 4 –
REDUCED MLWDC CAPACITY – NO EXPANSION**

Objective	Consistency Analysis
C. To maximize the financial resources available to the County's correctional system for construction and operation of jail facilities serving female inmates.	
7. To avoid or minimize land acquisition and entitlement costs and to efficiently use existing County-owned physical assets.	Partially Consistent. The renovation of the MLDC site would not involve land acquisition or entitlement costs. There would be required repairs to County assets in order to make the MLDC fully operational, but there would be no substantive changes to existing facilities. The creation of a male/female facility at the CRDF would divide resources for the qualifying female population.
8. To avoid or minimize costs and delays to resolve easement and other land title clearances involving other parties' property interests.	Consistent. The renovation of the MLDC site would not involve easement or land title clearances.
9. To avoid new land use conflicts by prioritizing the re-use of currently or formerly operated County-owned property with detention facilities.	Consistent. The reuse of the MLDC site would allow reuse of a currently County-owned and operated detention facility.
10. To control the higher costs of new construction compared to the cost of renovation of existing facilities and the higher costs of maximum security construction compared to medium and low security detention facility construction by renovating and re-purposing existing facilities and infrastructure and/or designing separate low and medium security detention facilities where feasible.	Consistent. The reuse of the MLDC site would incur lower costs due to no substantive new building construction or changes to existing facilities. Repairs would be necessary to make the MLDC site fully operational. However, there would be cost inefficiencies associated with splitting the eligible female population between the MLDC site and the CRDF.
11. To maximize the use of state grant funds from AB 900 and any other grant funds, including the maximization of the number of female inmate beds covered per grant.	Not Consistent. This alternative is not consistent with the County's grant application that was approved by the BSCC and would not allow for the use of AB 900 grant funds. No other grants are known to be available at this time.
12. To minimize the County's net cost to fund a female detention facility, including long-term operation and maintenance costs.	Not Consistent. A portion of the qualifying female inmate population would still need to be served at the CRDF. There would be additional cost inefficiencies associated with splitting the eligible female population between MLDC and CRDF.

As discussed above, Alternative 4 would provide a 55 percent reduction in capacity to serve eligible low- to medium-security level female inmates at the MLDC site when compared to the Project, requiring a division of services with the CRDF. The provision of GRR and EBI programs would be substantially reduced under Alternative 4 due to the lack of new/expanded facilities to provide customized services and the lack of adequate GRR, EBI and recreational program space in either MLDC or CRDF. The culinary arts program would be eliminated as would other program resources (e.g., classrooms, computer labs, video visitation areas, and recreation areas). Alternative 4 would have a reduced efficient for delivery of services/continuity of programs, with duplicative operations and staffing due to the need to operate and maintain two separate facilities for the same purpose. This inefficiency would result in increased operating costs to the County. Additionally, Alternative 4 would not allow for the use of AB 900 grant, which is site specific.

5.7.6 ALTERNATIVE 5: TWO SEPARATE WOMEN'S FACILITIES (AT MIRA LOMA DETENTION CENTER AND PITCHESS DETENTION CENTER SOUTH)

Alternative 5 proposes for consideration that two of the County's detention facilities would be reused to house eligible low- to medium-security level female inmates. This alternative assumes that approximately 880 female inmates would be housed at the MLDC site and up to 846 female inmates would be at PDC South.

PDC South is currently occupied by male inmates. As shown in Table 5-2, PDC South has an 846-bed capacity; it was built in 1971; and is considered to be in "good" condition. PDC South is a barrack-style facility that is similar to the facilities at MLDC, and therefore, more appropriately suited for a female inmate population on a permanent basis. The male inmates currently housed within PDC South would be transferred to the CRDF, which is designed for male inmates and would have capacity once the female inmates were transferred to MLDC and PDC South.

Alternative 5 would allow for the accommodation of an increased qualifying female population of up to 1,726 beds when compared to the proposed MLWDC Project's capacity of 1,604 beds. Under this alternative, neither the MLDC site nor PDC South would require new building construction or expansion for additional day space to accommodate the female population; however, there would not be adequate EBI, GRR, and recreational program space when compared to the proposed MLWDC Project.

As discussed under Alternative 4, MLDC does not contain any classroom space in its current configuration that could accommodate any EBI or GRR programming. The LASD standard for program space is 15 square feet (sf) for 80% of the female inmate population. However, only half of the inmate population would be in programming at any one time; therefore, the ideal programming space at MLDC would be approximately 8,250 sf ($[880 \text{ inmates} \times 80\%] / 2$). The PDC South contains 12 classrooms (approximately 8,400 sf assuming 700 sf/classroom), which is sufficient to serve the 846 female inmates. Therefore, Alternative 5 would not provide the programming space necessary to serve the female inmate population at MLDC, but would have adequate interior program space for female inmates at PDC South, as well as 31,800 sf of outdoor recreation areas. For comparison, the proposed MLWDC Project includes approximately 20,800 interior program space (Buildings 3, 4, 6, and 25) and 63,400 sf of exterior program space for inmates.

Repairs that would be required to accommodate 880 female inmates at the MLDC site would be exactly the same as set forth in Alternative 4. As such, Alternative 5 would implement Alternative 4, but rather than having the remaining female population stay at CRDF and having that facility become a split male/female facility, the remaining eligible female population would be relocated to PDC South. Alternative 5 would require a duplication of certain operations and staffing due to the need to operate and maintain two separate facilities for the same purpose. Maintaining female inmate housing at both PDC and MLDC would require duplication of medical services spaces to provide the specific medical needs of the female inmate population.

Under Alternative 5, the following actions would be required:

- Repairs to MLDC (see description of Alternative 4)
- Repairs to PDC South (to accommodate female population)
- Relocation of male inmates to CRDF

Because PDC South is currently occupied, it requires few physical improvements to serve the qualifying female population. Minor improvements to restroom facilities and the Inmate

Processing Area would be required, but substantive renovations or repairs would be unnecessary (LASD 2015a).

Comparative Analysis of Environmental Impacts

Aesthetics

Alternative 5 would not result in changes to the visual quality or aesthetics of the MLDC site because improvements would be largely internal to the existing structures. Mitigation associated with the potential light spill-over onto nearby sensitive receptors from the proposed MLWDC Project would still be required to account for the transition from the vacant facility to an active detention center. There would be no visual impacts associated with the use of PDC South for female inmates because no new construction, other than minor internal repairs, would be required.

Air Quality

Alternative 5 would have substantially reduced air quality impacts for short-term construction due to the elimination of demolition and new building construction, and reduced trenching for utilities at the MLDC site. Operational emissions would be similar to the proposed MLWDC Project because, although employee and visitation trips would be reduced due to the reduced inmate population, there would be operational inefficiencies associated with operating both the MLDC and PDC South for female inmates because staff travel would be divided between the two facilities and because of the possibility that employees would be needed to staff the two separate female programs.

Biological Resources

Alternative 5 would not disturb existing plant or animal species or their habitats because no buildings or structures would be demolished and because no areas with trees or landscaping would be removed at either the MLDC site or the PDC South/East facilities. Mitigation associated with nesting birds and bat roosts would likely not be required; however, impacts to jurisdictional resources due to the water line connection from MLDC to West Avenue I would be required.

Cultural Resources

Alternative 5 would not involve substantial ground disturbance or excavations that could disturb known or unknown historical, archaeological, and paleontological resources at either the MLDC site or the PDC South/East facilities. However, mitigation associated with archaeological and paleontological impacts for the proposed MLWDC Project would still be required due to the trenching for the water line connection to West Avenue I.

Geology and Soils

Alternative 5 would not require geotechnical investigations or additional requirements because no demolition or new facility construction would occur at either the MLDC site or the PDC South/East facilities.

Greenhouse Gas Emissions

Alternative 5 would have substantially reduced GHG impacts for short-term construction due to the elimination of demolition and new building construction, and reduced trenching for utilities. Long-term operational impacts would also be reduced at the MLDC site due to a smaller on-site

female inmate population, decreased program amenities and operations, and decreased worker and visitor traffic. However, more vehicle trips would be generated by the greater number of employees needed to staff the two separate female facilities at the MLDC and PDC South. No structures would meet the equivalent rating of LEED certification, although the MLDC facility would be able to use the solar energy from the adjacent solar energy facility.

Hazards and Hazardous Materials

Alternative 5 would not lead to demolition or construction activities that may encounter or utilize hazardous materials or wastes at either the MLDC site or the PDC South/East facilities. Mitigation associated with hazards (including underground storage tanks, lead-based paint and asbestos) for the proposed MLWDC Project would still be required if interior renovations would have contact with these substances.

Hydrology and Water Quality

Alternative 5 would not involve any changes in existing drainage patterns, storm drainage, percolation rates, runoff volumes, or other hydrologic conditions at either the MLDC site or the PDC South/East facilities. There would be new sources of urban runoff and increases in storm water pollutants due to the re-opening of the MLDC; however, Alternative 5 would not be required to incorporate current drainage and water quality standards (e.g., LID and SUSMP requirements). Water sources would change from County-owned groundwater well sources in the Antelope Valley to LACWWD40 sources.

Land Use and Planning

Alternative 5 would not result in any changes to existing land uses, zoning, land use designations, or land use compatibility at either the MLDC site or the PDC South/East facilities. No division of established communities or conflict with land use plans, policies, or programs would occur, similar to the proposed MLWDC Project.

Noise

Alternative 5 would not result in new construction or building rehabilitation that could adversely impact adjacent sensitive receptors at either the MLDC site or the PDC South/East facilities. Mitigation for short-term construction noise for the proposed MLWDC Project would not be required. New sources of long-term vehicle and stationary noise sources would be introduced to the Project site due to the re-opening of the MLDC.

Population and Housing

Alternative 5 would likely require more employees to account for the operation of two separate facilities and associated inefficiencies due to operating female programs at two separate facilities. However, this increase would be unlikely to alter the employment effects for the region when compared to the proposed MLWDC Project. Alternative 5 would create fewer jobs in the Lancaster area and fewer potential indirect development of housing that may increase the resident population of Lancaster area.

Public Services and Recreation

Alternative 5 would create demands for fire and police protection services from the County Fire Department and Sheriff's Department at two separate locations. Also, staffing redundancies for operating two female facilities would lead to greater demands for on-site Sheriff's Department

services. With the provision of on-site educational and recreational facilities at both facilities, no direct impacts on off-site schools, libraries, or parks would occur.

Transportation and Traffic

Alternative 5 would result in short-term construction-related traffic and long-term operational traffic impacts. Traffic would be reduced at the MLDC property due to the decreased inmate, employee, and visitor population, whereas traffic at PDC would increase. The PDC South is nearer the IRC where bookings and releases would occur and the County's urban center where most inmate households and potential on-site employees reside. Therefore, overall VMT would likely be reduced.

Utilities and Service Systems

Alternative 5 would create new demands for utilities and service systems at the MLDC site, although demands would be decreased due to the reduced inmate population and LASD staff when compared to the proposed MLWDC Project. LACWWD40 would provide potable water supplies to serve Alternative 5, as with the proposed MLWDC Project, although quantities would be reduced accordingly. Mitigation associated with new water supply sources for the proposed MLWDC Project would still be required.

Energy

Reuse of buildings under Alternative 5 would not be not required to achieve LEED certification or equivalent. The PDC South is nearer the IRC where bookings and releases would occur and the County's urban center where most inmate households and potential on-site employees reside. Therefore, overall VMT would likely be reduced. However, with the operation of two separate facilities, use of less energy-efficient housing, and inefficiencies in staffing and operations under Alternative 5, it is anticipated energy demands would be similar to the proposed MLWDC Project.

Alternative 5 Summary

The proposed MLWDC Project would not result in any significant impacts after mitigation. Alternative 5 would likely result in less than significant impacts after mitigation to the environment. Therefore, neither the proposed Project nor Alternative 5 would be considered environmentally superior when compared to the other, as summarized in Table 5-14 below.

**TABLE 5-14
SUMMARY OF ALTERNATIVE 5 IMPACTS**

Environmental Issue	Potential Significance of Alternative's Impacts	Summary of MLWDC Project Impacts	Compared to Impacts of Project After Mitigation
Aesthetics	Less Than Significant	Less Than Significant After Mitigation	Similar to Project
Air Quality	Less Than Significant	Less Than Significant	Similar to Project
Biological Resources	Less Than Significant After Mitigation	Less Than Significant After Mitigation	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	Similar to 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 After Mitigation	Similar to Project
Population and Housing	Less Than Significant	Less Than Significant	Similar to Project
Public Services and Recreation	Less Than Significant	Less Than Significant	Similar to Project
Transportation and Traffic	Less Than Significant	Less Than Significant	Similar to Project
Utilities and Service Systems	Less Than Significant After Mitigation	Less Than Significant After Mitigation	Similar to Project
Energy	Less Than Significant	Less Than Significant	Similar to Project
MLWDC: Mira Loma Women's Detention Center			

As summarized in Table 5-14 above, Alternative 5 would result in a similar level of environmental impacts when compared to the proposed MLWDC Project. This alternative would meet or partially meet most of the Project objectives, as discussed below in Table 5-15.

**TABLE 5-15
EVALUATION OF THE PROJECT OBJECTIVES AND ALTERNATIVE 5 –
TWO SEPARATE FACILITIES (AT MLDC AND PDC SOUTH)**

Objective	Consistency Analysis
A. To prioritize the on-site integration of gender-responsive female inmate education, treatment, and vocational training to reduce female inmate recidivism.	
1. To maximize system-wide efficiencies for County jails by providing a women's facility that meets the needs of the female population allowing for Gender Responsive Rehabilitation (GRR) model programming for eligible low- to medium-security female inmates.	Partially Consistent. The reuse of the MLDC site and PDC South would allow for some of the proposed GRR model programming to be accommodated within the existing facilities, but at a less comprehensive level, and some programs would not be instituted at all, including the culinary arts program. Programs would be managed at two separate locations, which would not maximize the efficiency of the County jails.
2. To provide a facility reflective of "real world" living that incorporates abundant natural light, opportunities for social interactions in landscaped open spaces, and defined functional areas to promote release readiness and community reintegration within a secured detention perimeter.	Partially Consistent. Alternative 5 would provide a campus-style facility reflective of "real world" living at the MLDC site, but facilities are less reflective of "real world" living at PDC South as there would be abundant natural light and opportunities for social interactions in landscaped open spaces at the MLDC, but facilities are less conducive to community reintegration at PDC South.
3. To reduce recidivism through programming and development of a women's detention facility at a site with sufficient space to accommodate both campus-style inmate housing and support facilities for education and vocational training, implementing the best practices of Education Based Incarceration (EBI), within a secured detention perimeter.	Partially Consistent. Alternative 5 would provide reduced program space for EBI and support facilities at both MLDC and PDC South due to the elimination of facility expansion when compared to the MLWDC Project.
B. To provide a detention facility with capacity for eligible low- to medium-security level female inmates.	
4. To permit re-allocation of detention facilities designed for higher security levels for male inmates and/or inmates with special security or other needs to serve the appropriate security-level populations.	Consistent. Alternative 5 would allow re-allocation of the CRDF for higher security levels for male inmates and/or inmates with special security needs at the CRDF. Male inmates at PDC South would be transferred to CRDF, resulting in an all-male population at CRDF.
5. To provide a facility with adequate capacity for a selected subset of the female inmate population based on security level and health status based on system trend analysis from data 2001-2013, which includes the beginning of the "AB 109" population of Low – Level (N3) Offender Population, and later state law changes.	Consistent. Alternative 5 would provide the capacity to accommodate the projected female inmate population, and would have increased capacity when compared to the MLWDC.
6. To reduce inmate overcrowding according to the BSCC standards for rated capacity, as determined for the qualifying female inmate population.	Consistent. Alternative 5 would have a 1,726-bed capacity, which is greater than the exiting and projected for female inmate population.
C. To maximize the financial resources available to the County's correctional system for construction and operation of jail facilities serving female inmates.	
7. To avoid or minimize land acquisition and entitlement costs and to efficiently use existing County-owned physical assets.	Consistent. Alternative 5 would not involve land acquisition or entitlement costs and would use existing County-owned assets.
8. To avoid or minimize costs and delays to resolve easement and other land title clearances involving other parties' property interests.	Consistent. Alternative 5 would not involve easement or land title clearances.
9. To avoid new land use conflicts by prioritizing the re-use of currently or formerly operated County-owned property with detention facilities.	Consistent. Alternative 5 would allow reuse of currently County-owned and operated detention facilities.

**TABLE 5-15
EVALUATION OF THE PROJECT OBJECTIVES AND ALTERNATIVE 5 –
TWO SEPARATE FACILITIES (AT MLDC AND PDC SOUTH)**

Objective	Consistency Analysis
10. To control the higher costs of new construction compared to the cost of renovation of existing facilities and the higher costs of maximum security construction compared to medium and low security detention facility construction by renovating and re-purposing existing facilities and infrastructure and/or designing separate low and medium security detention facilities where feasible.	Consistent. Alternative 5 would involve reuse of the MLDC site and PDC South and would not involve any new construction.
11. To maximize the use of state grant funds from AB 900 and any other grant funds, including the maximization of the number of female inmate beds covered per grant.	Not Consistent. This alternative is not consistent with the County's grant application that was approved by the BSCC and would not allow for the use of AB 900 grant funds. No other grants are known to be available at this time.
12. To minimize the County's net cost to fund a female detention facility, including long-term operation and maintenance costs.	Not Consistent. Alternative 5 would not minimize the County's operation and maintenance costs as two separate facilities would be operated with redundant staffing, programming and facilities, and in less energy-efficient buildings.

As discussed above, Alternative 5 would provide detention facilities with a slightly increased capacity of 1,726 beds for eligible low- to medium-security level female inmates when compared to the Project's proposed 1,604 beds. The provision of GRR and EBI programs would be reduced under Alternative 5 due to the lack of renovation and expansion of the facilities at MLDC to provide customized services, although adequate facilities would be located at PDC South. The culinary arts program would be eliminated at MLDC. Alternative 5 would have a reduced efficient delivery of services/continuity of programs, with duplicative operations and staffing due to the need to operate and maintain two separate facilities for the same purpose. This inefficiency would result in increased operating costs to the County. Additionally, Alternative 5 would not allow for the use of the AB 900 grant, which is site-specific.

5.8 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

CEQA requires the identification of an environmentally superior alternative. Section 15126.6(e)(2) of the State CEQA Guidelines states that, if the No Project Alternative is the environmentally superior alternative, then the EIR shall also identify an environmentally superior alternative among the other alternatives.

Alternative 1A – No Project/Continuation of Existing Operations would be considered environmentally superior because no changes or improvements to existing detention facilities or County operations that may result in environmental changes would occur. Therefore, existing conditions would not change and no environmental impacts would accompany this alternative. While Alternative 1 would result in fewer environmental impacts than the Project on most environmental issues, this alternative would not meet most of the Project's basic objectives. As such, the EIR must identify an environmentally superior alternative among the other alternatives.

Aside from the No Project Alternative, Alternative 4: Reduced MLWDC Capacity – No Expansion would also be considered environmentally superior. This alternative would allow the MLDC site to accommodate 880 beds for female inmates, which is a 55 percent reduced inmate capacity

when compared to the proposed MLWDC Project. Thus, a portion of the qualifying female inmate population would need to continue to be housed at the CRDF.

This alternative would result in no new building construction and only repairs to the existing MLDC facility; trenching for the new water line connection to LAWWD40; and disconnection from the existing on-site water infrastructure system. Environmental impacts under both the proposed MLWDC Project and the lower bed capacity at the Mira Loma Detention Center would be less than significant after mitigation.

While Alternative 4 represents the environmentally superior alternative due to the elimination of demolition and new construction at the MLDC site, this alternative would only be partially consistent with most of the Project objectives. Specifically, the provision of GRR and EBI programs would be substantially reduced under Alternative 4. MLDC does not contain any classroom space in its current configuration to accommodate any EBI or GRR programming, while the ideal programming space at MLDC would be approximately 8,250 sf ($[880 \text{ inmates} \times 80\%]/2$). The CRDF contains 4 classrooms (approximately 2,730 sf), which is insufficient to serve the 724 female inmates, which would require approximately 4,344 sf of program space at CRDF ($[724 \times 80\%]/2$). Therefore, Alternative 4 would not provide the programming space necessary to serve the female inmate population at either facility. For comparison, the proposed MLWDC Project includes approximately 20,800 interior program space (Buildings 3, 4, 6, and 25) and 63,400 sf of exterior program space for inmates.

Alternative 4 would result in a much less efficient delivery of services/continuity of programs, with duplicative operations and staffing due to the need to operate and maintain two separate facilities for the same purpose. This inefficiency would result in increased operating costs to the County. Additionally, Alternative 4 would not allow for the use of AB 900 grant which is site-specific.

5.9 REFERENCES

Board of State and Community Corrections (BSCC). 2013 (August). Rated Capacities and Facility Population- May 2013 BSCC Inspection. Sacramento, CA: BSCC.

California Department of Forestry and Fire Protection (CAL FIRE). 2011 (September). Los Angeles County - Very High Fire Hazard Severity Zones in LRA as Recommended by CAL FIRE. Sacramento, CA: CAL FIRE.

California Department of Water Resources (DWR). 2015 (March 18, access date). Best Available Maps Viewer – Floodplain Information. Sacramento, CA: DWR. <http://gis.bam.water.ca.gov/bam/>.

County of Los Angeles Office of the Sheriff. 2015 (July 21). Letter Correspondence from the Office of the Sheriff to the Board of Supervisors: Century Regional Detention Facility - Proposed treatment and Programming Annex Facility. Los Angeles, CA: Office of the Sheriff.

DMJM. 2007. *Final Facility Program: Sybil Brand Institute Renovation Project*. Los Angeles, CA: DMJM.

Kleinfelder. 2008. *Limited Engineering Geology Review of the Eastern Hill Complex, City Terrace Area, Los Angeles, California*. Los Angeles, CA: Kleinfelder.

Los Angeles, County of, Chief Executive Office (CEO). 2013 (August 20). Letter from CEO to Board of State and Community Corrections. Assembly Bill 900- Pitchess Detention Center

Women's Village Request for Information on Changing Project Location SB 1022-AB 900
Potential Grant Coordination. Los Angeles, CA: CEO

———. 2012 (March). County of Los Angeles Strategic Plan, 2012 Update. Los Angeles, CA: the County. <http://ceo.lacounty.gov/pdf/Strategic%20Plan%200312.pdf>.

Los Angeles Sheriff's Department (LASD). 2015a. (April 15). Personal communication. Telephone conference call with K. Porowski (LASD), K. Starbird, K. (BonTerra Psomas), A. Ramos (Los Angeles County Department of Public Works), and S. Tangri (Meyers/Nave).

———. 2015b. (May 12). Email correspondence from K. M. Poworski (Lieutenant with Los Angeles County Sheriff's Department) to A. Ramos (Project Manager with Los Angeles County Department of Public Works) on Monday, May 18, 2015.

———. 2012 (December 12). Letter Correspondence from the County of Los Angeles Sheriff's Department to the Board of Supervisors: Report Back on the Status of the Mira Loma Detention Center. Los Angeles, CA: LASD

Vanir Construction Management, Inc. (Vanir). 2014. (April 21). *Angeles County Jail Plan Independent Review and Comprehensive Report – Final Report*. Los Angeles, CA: County.

———. 2013. (July 5). *Los Angeles County Jail Plan Independent Review and Comprehensive Report – Final Report*. Los Angeles, CA: County.

SECTION 6.0 CEQA MANDATED SECTIONS

6.1 SIGNIFICANT ENVIRONMENTAL EFFECTS OF THE PROPOSED PROJECT

Pursuant to Section 15126.2(a) of the California Environmental Quality Act (CEQA) Guidelines, this Draft Environmental Impact Report (EIR) must identify and focus on the significant environmental effects of the proposed Project. The Project's potentially significant environmental impacts are summarized below and discussed in detail in Section 4.0 of this EIR. Although following mitigation, there would be no significant effects from the Project, the analyses in Sections 4.1 through 4.15 indicates the Project would result in significant environmental effects prior to mitigation on a number of environmental topics, including:

- Section 4.1 Aesthetics
- Section 4.3 Biological Resources
- Section 4.4 Cultural Resources
- Section 4.7 Hazards and Hazardous Materials
- Section 4.10 Noise
- Section 4.14 Utilities and Service Systems

As discussed in Section 4.1, Aesthetics, of this EIR, the Mira Loma Women's Detention Center (MLWDC) Project would introduce new lighting sources in the form of security lights, exterior building lights, and parking lot lights. MM AES-1 requires that a Lighting Plan be prepared to show the locations of lighting fixtures, types of fixtures, mounting heights, and aiming directions to be installed on the Project site. The Lighting Plan shall ensure that sensitive receptors on adjacent properties would not be significantly adversely affected by light spillover, while also ensuring that lighting levels meet the security requirements for the MLWDC. Implementation of MM AES-1 would ensure that impacts related to the potential for substantial light that could adversely affect day or nighttime views in the area would be less than significant after mitigation.

As discussed in Section 4.3, Biological Resources, construction activities may result in the removal/demolition of potentially occupied bat maternity roosts and active bird nests. MM BIO-1, which calls for pre-construction bat surveys, tree removal measures and bat exclusionary devices, would reduce the impact to less than significant levels. MM BIO-2, which requires seasonal avoidance or pre-construction surveys for nesting birds, is required to reduce potentially significant impacts nesting birds and active bird nests. If MLWDC implementation, including potential off-site trenching for the water line connection (temporary) and/or off-site construction of a storm drain outlet (permanent), would result in discharge to jurisdictional features, MM BIO-3 requires permits from resource agencies and mitigation for the potential loss of jurisdictional resources. Implementation of MM BIO-1 through MM BIO-3 would reduce Project impacts to less than significant levels after mitigation.

As discussed in Section 4.4, Cultural Resources, archaeological resources have been found in the surrounding area and grading/excavation associated with construction of the Project would have the potential to disturb any underlying archaeological resources. MM CUL-1 calls for a qualified Archaeologist to be retained by the County to attend the pre-grading meeting with the Construction Contractor and to establish, based on the site plans, appropriate procedures for monitoring earth-moving activities during construction. Monitoring should observe disturbance in the uppermost layers of sediment including the younger Quaternary alluvium and any found archaeological resources shall be salvaged and catalogued, as necessary. Implementation of

MM CUL-1 would reduce the potential for the destruction of any archaeological resources beneath the site to levels less than significant after mitigation.

Additionally, Quaternary alluvium and older Quaternary sediments that are present in the Project area have yielded fossils and excavations into these materials have the potential to disturb underlying paleontological resources. MM CUL-2 calls for a qualified Paleontologist to be retained by the County to monitor excavations into undisturbed deposits in the older Quaternary alluvium, which lies at an unknown depth below the younger Quaternary alluvium. The Paleontologist would evaluate any fossil resources found during excavation activities. If a fossil resource is determined to be significant, the Paleontologist shall formulate and implement a plan to recover and/or salvage the resource. Implementation of MM CUL-2 would reduce the potential for the destruction of any paleontological resources to levels less than significant after mitigation.

As discussed in Section, 4.7, Hazards and Hazardous Materials, previous use of the MLDC involved the use and storage of hazardous materials at the site, including insecticide, paint, paint thinner, motor oil, cleansers, gasoline, grease, sealant, degreaser, disinfectant, coolant, biohazard waste drums, used oil drum, gasoline containers, nitrous oxide and oxygen cylinders, aboveground fuel storage tank, underground fuel storage tanks (USTs), hydraulic hoists, transformers, asbestos-containing materials (ACM), lead-based paint, and other hazardous substances. In addition, construction and renovation activities will involve the use of hazardous materials and the generation of hazardous wastes.

Hazardous materials use, storage, transport and disposal would have to be made in accordance with existing regulations. In order to prevent the accidental release of asbestos fibers, MM HAZ-1 requires that, in the event that suspect building materials that have not been previously sampled are observed during renovation/remodeling activities, these materials should be assumed to contain asbestos, and if not tested, properly removed and disposed in accordance with AVAQMD Rule 1403 and CalOSHA regulations. Additionally, MM HAZ-2 requires that, in the event that suspect painted or ceramic surfaces that have not been previously sampled are observed during renovation/remodeling activities, these materials should be assumed to contain lead-based paint and disposed according to regulations. For buildings where ACM would remain in place and worker/inmate exposure may occur, MM HAZ-3 requires the development and implementation of an Operations and Maintenance (O&M) Plan that requires periodic observation, inspection, and documentation by designated staff to ensure that ACMs do not become damaged and do not result in airborne asbestos fiber release. Any removal would have to be conducted under the direction of a CalOSHA-certified Asbestos Consultant in accordance with existing regulations.

Implementation of MM HAZ-1 through MM HAZ-3 would reduce impacts related to hazards and hazardous materials to levels less than significant after mitigation.

As discussed in Section 4.10, Noise, short-term construction activities could exceed the maximum noise levels from operation of a generator, which could exceed the noise standard of 60 dBA. To limit stationary source noise to less than the County noise ordinance limit, MM NOI-1 would require stationary equipment to operate at a distance of greater than 450 feet or provide an enclosure or similar noise attenuation to limit the average hourly daytime noise level to 60 dBA or less. With the implementation of MM NOI -1, the temporary increase in ambient noise levels due to on-site construction stationary sources would be less than significant after mitigation.

As discussed in Section 4.14, Utilities and Service Systems, water service to the Project would be provided by the Los Angeles County Waterworks District No. 40 (LAWWD 40), instead of the currently used on-site groundwater wells. The Water Supply Assessment for the Project indicates that the LAWWD 40 would have the water supply needed to serve the Project during normal or average years, single-dry years, and multiple-dry years out to 2035. The LAWWD 40 has

implemented a developer fee program to provide funding for the acquisition of additional imported water supplies. In accordance with this program, MM UTL-1 requires the County to sign the New Water Supply Entitlement Acquisition Agreement with the LAWWD 40 and pay a deposit of \$10,000 per acre-foot of annual water demand from the Project for the acquisition of additional water supplies from Antelope Valley-East Kern Water Agency (AVEK) to serve the Project. With implementation of MM UTL-1, impacts on water supply would be less than significant after mitigation.

6.2 SIGNIFICANT ENVIRONMENTAL EFFECTS WHICH CANNOT BE AVOIDED IF THE PROPOSED PROJECT IS IMPLEMENTED

Pursuant to Section 15126.2(b) of the CEQA Guidelines, this Draft EIR considers the significant environmental effects which cannot be avoided if the Project is implemented. With implementation of mitigation measures in Section 4.0 of this EIR, Project impacts would be reduced to levels less than significant. No significant unavoidable adverse impacts would occur with Project implementation. Also, the Project would not result in cumulatively significant adverse impacts on any environmental issue.

6.3 GROWTH-INDUCING IMPACTS

Pursuant to Sections 15126(d) and 15126.2(d) of the CEQA Guidelines, this section is provided to examine ways in which the proposed Project could foster economic or population growth or the construction of additional development, either directly or indirectly, in the surrounding environment.

“Direct growth” would be induced by the creation of the facilities within the Project boundaries, as well as off-site Project components, which would directly accommodate a new population in the region (e.g., new housing units) or provide employment opportunities that require a new population to locate into the region (e.g., new employment center).

“Indirect growth” would be attributable to and stimulated by a project’s construction and/or operation. Indirect growth would be induced by either removing obstacles to population growth (e.g., expanding infrastructure such as utilities and roadways; expanding public services; changes in existing regulations pertaining to land development); and/or stimulating economic activity that attracts a new population.

The CEQA Guidelines state that growth-inducing effects are not necessarily beneficial, detrimental, or of little significance to the environment. If a project is determined to be growth-inducing, then it must be determined if the induced growth would result in significant environmental impacts.

Direct and/or indirect growth would occur if the Project would:

1. Create new housing units that would attract a new population into the region.
2. Create employment opportunities that require a new population to locate into the region.
3. Remove obstacles to population growth by: (a) expanding infrastructure capacity beyond what is required to serve the Project; (b) expanding public facilities and/or services beyond what is required to serve the Project; and/or (c) changing existing regulations pertaining to land development.
4. Generate additional demands in the region for goods and services that would result in increased economic activity in the region?

The analysis below provides information on whether the Project could be directly or indirectly growth-inducing, and if found to be growth-inducing, whether the growth could contribute to significant changes to the environment beyond the direct consequences associated with construction and operation of the Project.

1. Would the Project create new housing units that would attract a new population into the region?

As discussed in Section 3.0, Project Description, the Project would involve the renovation and expansion of an existing correctional facility to accommodate the existing and future female inmate population of qualifying low- to medium-security female inmates and would not provide housing for the general public. Therefore, the Project would not directly induce a new residential population into the region.

The Project would not induce growth in the County's female inmate population or promote incarceration, but would accommodate the qualifying low- and medium security female inmate population within the County's jail system. The proposed 1,604-bed capacity of the MLWDC is based on the existing qualifying female inmate population, as discussed in Section 3.0, Project Description. The Project is anticipated to provide better detention and rehabilitation facilities so as to eventually decrease recidivism and to prevent increases in the female inmate population over time or the early release of female inmates due to the lack of capacity at the Project or other County detention facilities. As such, the Project would not indirectly induce growth in the female inmate population in Los Angeles County.

The Project would allow the Century Regional Detention Facility (CRDF) to be re-used for its designed purpose, which is to accommodate higher-security male inmates. The re-use of CRDF for this appropriate security-level inmate population would help to alleviate the overcrowding within the Los Angeles County Sheriff's Department (LASD) jail system. As shown by Table 5-1 in Section 5.0, Alternatives, all existing LASD jail facilities range from 31.5% to 89.3% over capacity according to the 2013 inmate population compared to the BSCC rated capacity. Therefore, the availability of capacity within CRDF that would result from the implementation of the MLWDC would not promote incarceration due to available bed capacity, but would only assist in decreasing overcrowding.

As discussed in Section 4.11, Population and Housing, families of the prisoners could relocate to the Lancaster area in order to be closer for the convenience of regular visitations. However, due to the relatively short duration of time that female inmates would be located at MLWDC (average of 380 days for AB 109-sentenced inmates and average of 87 days for County-sentenced inmates), family relocation is anticipated to be minimal, although indirect population growth is possible. If relocation would occur, these new residents would generate demands for housing and commercial goods/services in the region.

There are 4,912 vacant housing units in the City as of January 2015 in addition to the residential development planned in the area (see Section 2.4, Cumulative Projects, of this EIR). The addition of new households into the area due to family relocations would not substantially affect the availability of housing in the City of Lancaster or necessitate construction of new housing. Therefore, any increase in the local population due to family relocations could be accommodated by the existing housing stock and would not contribute to significant changes to the environment beyond the direct consequences associated with construction and operation of the Project.

2. Would the Project create employment opportunities that require a new population to locate into the region?

As discussed in Section 4.11, Population and Housing, the Project would require both short-term construction jobs and long-term operational jobs that would increase the employment opportunities in the region. Because the Project would create new employment opportunities, it could require a new population to locate into the region, and could be considered growth-inducing.

However, it is not anticipated that this potential population growth associated with new employment opportunities would contribute to significant changes to the environment beyond the direct consequences associated with construction and operation of the Project. As discussed in Section 4.11, Population and Housing, existing commercial uses in and near the site are expected to meet the short-term and limited demand for goods and services generated by construction crews during the construction phase of the Project. The short-term nature of the construction activity would not be of sufficient duration to encourage the households of construction crews to move into the surrounding area. As such, construction activities are not expected to create a demand for housing nor induce housing development due to the short-term nature of employment at the site.

As stated in Section 3.0, Project Description, the Project would be staffed by approximately 523 employees for long-term operations. With an unemployment rate of 8.1 percent in the City and 7.2 percent in the County as of March 2015, the on-site jobs may be filled by the available unemployed local labor force of over 5,200 persons in the City of Lancaster and the unemployed labor force from other areas in Los Angeles County and region.

However, the 523 employment positions generated by the Project would be filled based on the LASD's hiring protocol and requirements and individual eligibility for the vacant positions. The LASD staffing of MLWDC and hiring protocol includes a "first right of refusal" to a pool of approximately 70 LASD staff members who remain employees and previously worked at MLDC under the federal ICE operations, and would then offer employment opportunities throughout the existing LASD workforce. Detailed review of all LASD staff zip code data shows that a total of 2,602 employees currently reside in the Santa Clarita and Antelope Valley areas. If all 523 MLWDC employees come from the pool of 2,602 LASD employees already living in the area, there would be no expected relocations into the City of Lancaster and no growth-inducing impacts from new employment at the Project site.

If there are remaining positions at the MLWDC after LASD employee transfer requests, the last group would consist of newly hired employees. As discussed in Section 4.11, Population and Housing, the most conservative scenario assumes that all 523 employees would be new hires and would all relocate from other places into the City of Lancaster itself. The 523 new employees at the Project site would equate to a maximum potential demand for 523 housing units, leading to an increase in the City's population by 1,684 persons (assuming an average household size of 3.22 persons per household, which is the City's average household size in 2015) (DOF 2015). The introduction of 1,684 new residents into the City would represent a 1.05 percent increase in the City's 2015 population of 160,784 persons.

There are 4,912 vacant housing units in the City as of January 2014 in addition to the residential development planned in the area (see Section 2.4, Cumulative Projects, of this EIR). The addition of as many as 523 potential new households would not substantially affect the availability of housing in the City of Lancaster or necessitate construction of new housing. Therefore, although the Project's employment opportunities may be growth-inducing, the associated increase in the local population could be accommodated by the existing housing and would not contribute to

significant changes to the environment beyond the direct consequences associated with construction and operation of the Project.

3. Would the Project remove obstacles to population growth by: (a) expanding infrastructure capacity beyond what is required to serve the Project; (b) expanding public facilities and/or services beyond what is required to serve the Project; and/or (c) changing existing regulations pertaining to land development?

The Project would reuse an existing County detention facility; rehabilitation, expansion, and reuse of the MLWDC would not remove obstacles to growth in the surrounding area since the site is developed with existing facilities that have been used as a detention facility for many years and closed in 2012. No new land uses would be introduced on the site. No new growth in the surrounding area is anticipated with the proposed facility reuse.

(a) Expanding infrastructure capacity beyond what is required to serve the Project:

On-site infrastructure improvements, including water, wastewater, and storm drain infrastructure, would be sized to only serve the Project and would not be up-sized to serve existing or future land uses that may be located near the MLWDC. The Project's water system would be disconnected from the other buildings and structures outside of the Project site, including disconnection from the former High Desert Health System Multi-Ambulatory Care Center (HDHS MACC); the County Animal Care and Control – Lancaster Shelter; and the residential apartments and bachelor officer's quarters (BOQ) on the west side of 60th Street West. No growth-inducing impacts related to the improvements and expansion of on-site infrastructure would occur.

The proposed off-site water pipeline extension would connect to the existing 12-inch LACWWD 40-owned distribution pipeline in West Avenue I. This extension would be appropriately sized to serve the Project site and is not anticipated to service to surrounding land uses. As previously discussed, the Project site will be disconnected from the larger existing water distribution system on the MLDC site and will be a closed-loop system to serve only the MLWDC. Existing sewer lines would not require upgrading but new laterals would be provided to serve new buildings and accommodate the Project's anticipated sewage flows.

The proposed improvements to the existing driveways would provide one inbound travel lane and one outbound travel lane, with a stop-sign facing the minor street approach (i.e., at the Project driveway). Roadways internal to the Project site would be improved, but no new roads or roadway extensions are proposed by the Project off-site. Additionally, there are no off-site traffic improvements proposed that could alter the existing roadway network. No growth-inducing impacts related to the driveway and internal roadway improvements would occur.

(b) Expanding public facilities and/or services beyond what is required to serve the Project

As discussed in Section 4.12, Public Services and Recreation, increased demand for public services would occur with the Project. The Los Angeles County Fire Department (LAFD) indicates that fire protection services in the area "appears to be adequate for the existing development/land use. While each additional development creates greater demands on existing resources, in the absence of cumulative impact, this project appears to have a less than significant impact on fire protection services" (LACFD 2014). The LASD indicates that the Project would result in a less than significant impact on law enforcement resources and operations because the previously occupied facility was already within the Lancaster Station's service area (LASD 2014).

The increased demands for fire and police protection services would not require an expansion of existing facilities or service levels. Since no identified deficiencies in existing service levels have

been identified by the public service agencies and no new public service facilities are proposed or would be required by the Project, any future changes in public service levels would only be undertaken by each agency to serve cumulative increases in service demands in their service area, and would not be directly proposed by the Project so as to induce growth in the surrounding area.

No direct demand for off-site schools, library services, or parks would be generated by the Project, as classrooms, a library and indoor and outdoor recreational facilities would be provided on-site. Indirect demands for schools, library services, and parks from Project employees and inmate households that may relocate into the area are anticipated to be accommodated by existing facilities, as discussed in Section 4.12, Public Services and Recreation.

The Project's incremental need to expand public services through additional equipment and personnel would not have a direct environmental impact. No new LAFD stations, LASD stations, schools, libraries, or other public facilities are proposed as part of the Project, nor would any be needed to serve the Project. Therefore, the Project would not have an indirect growth-inducing impact with respect to the expansion of public services.

(c) Changing existing regulations pertaining to land development.

No change to existing land use regulations applicable to the site is necessary to implement the Project. Specifically, the Project does not require a General Plan Amendment (associated with a change to the current land use designation) or zone change that may affect compatibility with adjacent land uses. The existing "Public" land use designation and zoning of the site will remain in place and the Project would be consistent with this designation and zoning since it would not change the detention facility use of the property.

4. Would the Project generate additional demands in the region for goods and services that would result in increased economic activity in the region?

Short-term demands for building materials and long-term demands for supplies and services to the Project may stimulate additional economic activity in the region. The new employees and their families may present business opportunities for new shopping, entertainment, construction materials/home improvement, maintenance, commercial service providers, and other non-residential developments. This could encourage new businesses and/or the expansion of existing businesses that address these economic needs of the local population. Therefore, the Project could be indirectly growth-inducing through the facilitation of additional demands for goods and services in the region.

However, the increased demand would not result in substantial growth in the region. As discussed in Section 4.11, Population and Housing, the region has been economically depressed in recent years, with an unemployment rate of 8.1 percent in the City of Lancaster and 7.2 percent in the County as of March 2015. The relatively minor amount of economic activity generated by the Project's additional demands for goods and services in the region could help to invigorate the local economy, but is not expected to require new businesses or land development that could contribute to significant changes to the environment beyond the direct consequences associated with construction and operation of the Project.

The Project is not expected to induce development in vacant areas adjacent to the site. Since these adjacent vacant lands did not develop when the MLDC was in use, it is likely that the presence of employees, inmates and visitors at the former ICE facility did not influence commercial development in the surrounding area. With the reuse of the majority of the MLDC property, even with the proposed expansion in the bed capacity when compared to the 2012 ICE

operations, it is not expected to indirectly lead to new commercial development to provide goods and services to employees and visitors of the Project. Economic forces (i.e., market demand, available supply, financing, property ownership, cost of construction, local taxes and fees, and return on investment) are likely to be greater factors that would dictate investment and development activities in the surrounding area than the rehabilitation and reuse of an existing detention facility.

The analyses in Sections 4.1 through 4.15 of this EIR include the potential environmental impacts of the Project, along with the cumulative impacts of the Project when considered with future growth and development in adjacent areas as presented by the cumulative projects. As discussed, the Project's cumulative impacts would be less than significant.

These cumulative projects and other development projects would be subject to review and approval by the City or County with jurisdiction over the individual project site and would include the necessary environmental clearance in accordance with CEQA. This environmental review process would avoid or reduce potentially significant adverse impacts that may occur from individual project proposals. Development review would also ensure that proposed projects are consistent with adopted land use policies and regulations and do not exceed permitted development densities and intensities. Public utility service providers would also need to determine whether the additional growth associated with individual projects can be accommodated by existing or planned infrastructure improvements and the public service and utility agencies' capabilities to provide their respective services. This review and approval of individual developments by public agencies and service providers would allow for the provision of adequate services and infrastructure to serve the cumulative projects and other future development projects, while ensuring that no land use conflicts are created. Mitigation measures, regulatory requirements, and conditions of approval imposed on individual development projects in the area are expected to avoid or reduce environmental impacts, which may be indirectly induced by the Project.

Therefore, the Project's growth-inducing impacts from increased economic activities are not expected to result in significant adverse effects on the environment.

6.4 REFERENCES

California Department of Finance (DOF). 2015 (May 1). E-5 Population and Housing Estimates for Cities, Counties, and the State, January 1, 2011 – 2015. Sacramento, CA: DOF.

Los Angeles County Fire Department (LAFD). 2014 (December 2). Personal communication. Correspondence from L. Bagwell (LAFD) to Daria Sarraf (BonTerra Psomas). Los Angeles, CA: LAFD.

Los Angeles County Sheriff's Department (LASD). 2014 (October 15). *Review Comments, Initial Study and Notice of Preparation of an Environmental Impact Report, Mira Loma Detention Center Women's Facility Project*. Monterey Park, CA: LASD.

SECTION 7.0 LIST OF EIR PREPARERS AND CONTRIBUTORS

7.1 EIR PREPARERS

7.1.1 COUNTY OF LOS ANGELES

Matthew Diaz Project Manager, Chief Executive Office
Alicia Ramos Project Manager, Department of Public Works
Gary Tse Assistant Division Director, Administration and Training Division,
Sheriff's Department
Lt. Kelly Porowski Jail Planning Team, Sheriff's Department
Kelly Chui Jail Planning Team, Sheriff's Department
Lt. Marjory Jacobs Jail Planning Team, Sheriff's Department
Hugo Macias Jail Planning Team, Sheriff's Department
Brian Hirata Jail Planning Team, Sheriff's Department
Steven Chang Jail Planning Team, Sheriff's Department
Evenor Masis Industrial Hygienist, Department of Health Services

7.1.2 BONTERRA PSOMAS

Joan Kelly, AICP Principal-in-Charge
Kristin Starbird Project Manager
Josephine Alido, AICP Environmental Planner
Jillian Neary Environmental Planner
Daria Sarraf Environmental Planner
Patrick O. Maxon Manager, Cultural Resources
Marc T. Blain Manager, Biological Resources
Sarah Thomas Biologist
James P. Kurtz Manager, Air Quality and Acoustical Programs
Mike Swan, PE, ENV SP Senior Project Manager, Water & Wastewater Infrastructure
Charles Heffernan, PE Senior Project Manager, Civil Engineering Services
David Martin, PE, ENV SP Senior Project Manager, Civil Engineering Services
Julia Black Technical Writer
Sheryl Kristal Word Processor
Jon Zimmer GIS Specialist

7.2 CONTRIBUTORS

7.2.1 DLR GROUP

Andrew M. Cupples, AIA Principal
Gregg S. Williams, AIA, CSI Architect

7.2.2 LINSCOTT, LAW AND GREENSPAN, ENGINEERS

Traffic Analysis

Clare M. Look-Jaeger, P.E. Principal, Traffic Engineer
Chin Taing, PTP Transportation Planner

7.2.3 GPA CONSULTING

Historic Evaluation

Laura Vanaskie O'Neill Senior Architectural Historian
Elysha Paluszek..... Architectural Historian II
Amanda YoderArchitectural Historian I

7.2.4 CONVERSE CONSULTANTS

Geotechnical Report and Hazardous Materials Reports

William Chu, P.E., G.E.....Principal Engineer
Mark Schluter, C.E.G..... Senior Engineering Geologist
Norman Eke, CACManaging Officer
Michael Van Fleet, PG Senior Geologist
Laura Cattaneo Staff Environmental Scientist
Laura Tanaka.....Principal Environmental Scientist

7.3 PERSONS CONTACTED

Adriana Raza, Los Angeles County Sanitation Districts
Cheryl Gorman, Lancaster School District
Cyndie Thompson, Antelope Valley Union High School District
Frank Vidales, Los Angeles County Fire Department
Joshua Hussey, P.E., Los Angeles County Department of Public Works
Randy Harris, Los Angeles County Sheriff's Department
Robert Graves, Verizon
Robert Reihls, Time Warner Cable
Tim Bruce, Southern California Gas Company
Yolanda de Ramus, County of Los Angeles Public Library

Resumes for consultants are included in Appendix I of this Draft EIR.

SECTION 3.0 MITIGATION MONITORING AND REPORTING PROGRAM

Section 21081.6 of CEQA and Section 15097 of the State CEQA Guidelines require a public agency to adopt a Mitigation Monitoring and Reporting Program (MMRP) for assessing and ensuring the implementation of required mitigation measures applied to proposed projects. Specific reporting and/or monitoring requirements that will be enforced during project implementation shall be adopted simultaneously with final Project approval by the responsible decision makers.

The MMRP for the Mira Loma Women's Detention Center (MLWDC) includes Mitigation Measures (MMs) that will reduce or avoid significant environmental effects associated with Project implementation. For ease of reference, the MMRP also includes the Project Design Features (PDFs) and Regulatory Requirements (RRs) that are applicable to the Project and will reduce potential environmental impacts. The PDFs and RRs are included in the MMRP for convenience as only MMs are required to be in the MMRP.

The PDFs, RRs, and MMs for the MLWDC are listed in the first column in Table 1 below, along with the timeframe for implementation of the PDF, RR, or MM in the second column, the agency or party with primary responsibility for implementing the PDF, RR or MM in the third column, and the agency or party with responsibility for monitoring compliance in the fourth column. Implementation of the PDFs, RRs and MMs for the MLWDC would primarily be the responsibility of the County of Los Angeles, as the Lead Agency under CEQA, and its consultants/contractors.

**TABLE 3-1
MITIGATION MONITORING AND REPORTING PROGRAM**

Mitigation Measures	Mitigation Timing	Responsible Agency/Party	Monitoring Agency/Party
Aesthetics (Section 4.1 of the EIR)			
RR AES-1: Proposed off-site improvements within the public right-of-way will comply with applicable standards in the City of Lancaster's <i>Design Guidelines</i> as they relate to streetscape design for sidewalks and parkways.	Prior to approval of final designs	Design-Builder	County of Los Angeles Department of Public Works and City of Lancaster
MM AES-1 A Lighting Plan shall be prepared that depicts the locations of lighting fixtures, types of fixtures, mounting heights, and aiming directions to be installed on the Project site. The Lighting Plan shall ensure that sensitive receptors on adjacent properties would not be significantly adversely affected by light spillover, while also ensuring that lighting levels meet the security requirements for the MLWDC. The Lighting Plan shall be provided to the Los Angeles County Director of Public Works (DPW) to confirm its findings prior to the commencement of any on-site or off-site demolition/construction activities. Upon approval of the Lighting Plan by DPW, the Project shall be implemented in compliance with the Plan.	Prior to commencement of any on-site or off-site demolition/construction activities	Design-Builder	County of Los Angeles Department of Public Works
Air Quality (Section 4.2 of the EIR)			
PDF AIR-1 The following administrative controls and hazard awareness actions will be included in the Contractor's Specifications: <ol style="list-style-type: none"> 1. Prior to Project construction initiation, and for any personnel additions after Project construction initiation, the County's contractor shall be informed of the following California Department of Public Health (CDPH) materials on Valley Fever, or any updated materials as applicable, will be distributed to worksite supervisors: <ol style="list-style-type: none"> i. CDPH pamphlet entitled "Preventing Work-Related Coccidioidomycosis (Valley Fever)" available at: http://www.cdph.ca.gov/programs/hesis/Documents/CocciFact.pdf (CDPH 2013a). 2. Prior to Project construction initiation, and for any personnel additions after Project construction initiation, the County's contractor shall be informed of the following 	Prior to approval of contractor's specifications and Prior to commencement of construction activities	Design-Builder	County of Los Angeles Department of Public Works

**TABLE 3-1
MITIGATION MONITORING AND REPORTING PROGRAM**

Mitigation Measures	Mitigation Timing	Responsible Agency/Party	Monitoring Agency/Party
<p>CDPH materials on Valley Fever, as well as any updated materials as applicable, will be distributed to construction workers:</p> <ul style="list-style-type: none"> i. CDPH pamphlet entitled "Valley Fever Fact Sheet" available at: http://www.cdph.ca.gov/HealthInfo/discond/Documents/VFGeneral.pdf (CDPH 2013b). ii. CDPH pamphlet entitled "Hoja de datos de la Fiebre del Valle (Valley Fever Fact Sheet in Spanish)" available at: http://www.cdph.ca.gov/HealthInfo/discond/Documents/HojaDeDatosDeLaFiebreDelValle.pdf (CDPH 2013c). iii. CDPH pamphlet entitled "Fact Sheet ng Valley Fever (Valley Fever Fact Sheet in Tagalog)," available at: http://www.cdph.ca.gov/HealthInfo/discond/Documents/TagalogGeneralValleyFeverFactSheet.pdf (CDPH 2013d). 			
<p>PDF AIR-2 The Contractor's Specifications will be required to comply with County's Specifications No. 7266, which require best management practices for construction activities. These Best Management Practices include:</p> <ul style="list-style-type: none"> • Eroded sediments and other pollutants must be retained on site and may not be transported from the site via sheetflow, swales, area drains, natural drainage courses or wind. • Stockpiles of earth and other construction related materials must be protected from being transported from the site by the forces of wind or water. • Fuels, oils, solvents and other toxic materials must be stored in accordance with their listing and are not to contaminate the soil and surface waters. All approved storage containers are to be protected from the weather. Spills must be cleaned up immediately and disposed of in a proper manner. Spills may not be washed into the drainage system. • Excess or waste concrete may not be washed into the public way or any other drainage system. Provisions shall be made to retain concrete waste on sites until they can be disposed of as solid waste. 	<p>Prior to approval of contractor's specifications and During construction activities</p>	<p>Design-Builder</p>	<p>County of Los Angeles Department of Public Works</p>

**TABLE 3-1
MITIGATION MONITORING AND REPORTING PROGRAM**

Mitigation Measures	Mitigation Timing	Responsible Agency/Party	Monitoring Agency/Party
<ul style="list-style-type: none"> • Trash and construction related solid wastes must be deposited into a covered receptacle to prevent contamination of rainwater and dispersal by wind. • Sediments and other materials may not be tracked from the site by vehicle traffic. The construction entrance roadways must be stabilized so as to inhibit sediments from being deposited into the public way. Accidental depositions must be swept up immediately and may not be washed down by rain or other means. • Any slopes with disturbed soils or denuded of vegetation must be stabilized so as to inhibit erosion by wind and water. 			
<p>PDF AIR-3 The Contractor's Specifications will require that on-site gardening features be constructed within raised beds only and will be filled with imported soils derived from outside the Antelope and Kern Valleys so that inmates would not be interacting directly with local soils.</p>	<p>Prior to approval of contractor's specifications and Ongoing, throughout operations</p>	<p>Design-Builder</p>	<p>County of Los Angeles Department of Public Works and County of Los Angeles Sheriff's Department</p>
<p>RR AIR-1 All construction activities will be conducted in compliance with any applicable AVAQMD rules and regulations, including but not limited to the following:</p> <ul style="list-style-type: none"> • Rule 403, Fugitive Dust, for controlling fugitive dust and avoiding nuisance. • Rule 402, Nuisance, which states that a Project shall not "discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property". • Rule 1113, which limits the volatile organic compound content of architectural coatings. • Rules 201, 203 and 219, which regulate permits for installation and use of equipment that may generate air contaminants, such of commercial kitchen equipment and emergency generators. 	<p>During construction activities</p>	<p>Design-Builder</p>	<p>County of Los Angeles Department of Public Works</p>

**TABLE 3-1
MITIGATION MONITORING AND REPORTING PROGRAM**

Mitigation Measures	Mitigation Timing	Responsible Agency/Party	Monitoring Agency/Party
RR AIR-2 All construction activities will be conducted in compliance with Department of Health - Infection Control Policy Guidelines Procedure No. 918.01, which requires that building additions, demolition, retrofit, alterations, new construction comply with the Infection Control Policy.	During construction activities	Design-Builder	County of Los Angeles Department of Public Works
RR AIR-3 All construction activities will be conducted in compliance with 13 CCR §2485, which requires that all diesel-fueled commercial motor vehicles must not idle for more than 5 consecutive minutes at any location.	During construction activities	Design-Builder	County of Los Angeles Department of Public Works
Biological Resources (Section 4.3 of the EIR)			
MM BIO-1 Prior to commencement of construction activities, a qualified Biologist shall conduct a pre-construction bat habitat assessment of the trees and/or structures marked for potential removal/demolition. Potential for roosting shall be categorized by (1) potential for solitary roost sites and (2) potential for colonial roost sites (i.e., ten bats or more). If the potential for colonial roosting is determined, those trees/structures shall not be removed during the bat maternity roost season (March 1 to July 31). Trees potentially supporting colonial roosts outside the maternity roost season, and trees potentially supporting solitary roosts, may be removed via a two-step removal process whereby, at the direction of the Biologist, some level of disturbance (such as trimming of lower branches) is applied to the tree on the day prior to removal to allow bats to escape during the darker hours, and the roost tree shall be removed the following day (i.e., there shall be no less or more than one night between initial disturbance and the grading or tree removal). Structures potentially supporting colonial roosts outside the maternity roost season and structures potentially supporting solitary roosts may be fitted with a bat exclusionary device at the entry location, whereby bats are allowed to leave the structure but are unable to return. The structure can be demolished the following day. The results of the pre-construction bat habitat assessment, and any measures taken to protect bats, shall be documented and provided to the Los Angeles County Department of Public Works.	Prior to commencement of construction activities	Biologist	County of Los Angeles Department of Public Works

**TABLE 3-1
MITIGATION MONITORING AND REPORTING PROGRAM**

Mitigation Measures	Mitigation Timing	Responsible Agency/Party	Monitoring Agency/Party
<p>MM BIO-2 The Project shall be conducted in compliance with the conditions set forth in the Migratory Bird Treaty Act (MBTA) and California Fish and Game Code with methods accepted by the U.S. Fish and Wildlife Service (USFWS) and the California Department of Fish and Wildlife (CDFW) to protect active bird/raptor nests. To the extent feasible, vegetation/tree removal shall occur during the non-breeding season for nesting birds (generally late September to early March) and nesting raptors (generally early July to late January) to avoid impacts to nesting birds and raptors. If the nature of the Project requires that work be initiated during the breeding season for nesting birds and raptors (February 1 to August 31), a pre-construction survey shall be conducted by a qualified Biologist (i.e. one with experience conducting nesting bird surveys) for nesting birds and raptors within 3 days prior to clearing of any vegetation and/or any work near existing structures (i.e., within 300 feet for nesting birds, within 300 feet for nesting special status birds, and within 500 feet for nesting raptors). If the Biologist does not find any active nests within or immediately adjacent to the impact area, the vegetation clearing/construction work shall be allowed to proceed. A letter report shall be prepared and submitted to the Los Angeles County Department of Public Works to document the survey findings and recommended protective measures.</p> <p>If the Biologist finds an active nest within or immediately adjacent to the construction area and determines that the nest may be impacted or breeding activities substantially disrupted, the Biologist shall delineate an appropriate buffer zone around the nest depending on the sensitivity of the species and the nature of the construction activity. Any nest found during survey efforts shall be mapped on the construction plans. The active nest shall be protected until nesting activity has ended. To protect any nest site, the following restrictions to construction activities shall be required until nests are no longer active, as determined by a qualified Biologist: (1) clearing limits shall be established within a buffer around any occupied nest (the buffer shall be 25–300 feet for nesting birds and 300–500 feet for nesting raptors), unless otherwise determined by a qualified Biologist and (2) access and surveying shall be restricted within the buffer of any occupied nest, unless otherwise determined by a qualified Biologist.</p>	<p>Completed within 3 days prior to vegetation clearing and During construction activities, if nesting birds are present</p>	<p>Biologist</p>	<p>County of Los Angeles Department of Public Works</p>

**TABLE 3-1
MITIGATION MONITORING AND REPORTING PROGRAM**

Mitigation Measures	Mitigation Timing	Responsible Agency/Party	Monitoring Agency/Party
<p>Encroachment into the buffer area around a known nest shall only be allowed if the Biologist determines that the proposed activity would not disturb the nest occupants. Flagging, stakes, and/or construction fencing shall be used to demarcate the buffer around the nest and construction personnel shall be instructed as to the sensitivity of the area. Construction will be allowed to proceed when the qualified Biologist has determined that fledglings have left the nest or the nest has failed.</p>			
<p>MM BIO-3 If MLWDC implementation, including potential off-site trenching for the water line connection (temporary) and/or off-site construction of a storm drain outlet (permanent), would result in discharge to jurisdictional features, the County shall consult with the CDFW and the RWQCB to determine if the agency will consider the feature to be within their jurisdiction and require regulatory permits. If an agency indicates that the feature will not be regulated and no permit is required, no further action will be required for that agency. If an agency indicates that the feature will be regulated and permits are required, the balance of this Mitigation Measure, described below, shall be implemented prior to initiation of Project activities.</p> <p>Prior to initiation of Project activities, the County shall obtain any necessary permits for impacts to Regional Water Quality Control Board (RWQCB) and CDFW jurisdictional areas. Mitigation for the loss of jurisdictional resources shall be negotiated with the resource agencies during the regulatory permitting process. Potential mitigation options shall include one or more of the following: (1) payment to a mitigation bank or regional riparian enhancement program (e.g., invasive plant or wildlife species removal) and/or (2) restoration of riparian habitat either on site or off site at a ratio of no less than 1:1, determined through consultation with the above-listed resource agencies. If in-lieu mitigation fees are required, prior to the initiation of any construction-related activities, the LACFCD shall pay the in-lieu mitigation fee to a mitigation bank/enhancement program for the in-kind (equivalent vegetation type and acreage) replacement of impacted jurisdictional resources. If a Restoration Program is required, prior to the initiation of any construction-related activities, LACFCD shall prepare and submit a Riparian Habitat Mitigation</p>	<p>Prior to off-site trenching for water line connection and storm drain outlet construction</p>	<p>County of Los Angeles Department of Public Works and Biologist, if required</p>	<p>County of Los Angeles Department of Public Works</p>

**TABLE 3-1
MITIGATION MONITORING AND REPORTING PROGRAM**

Mitigation Measures	Mitigation Timing	Responsible Agency/Party	Monitoring Agency/Party
<p>and Monitoring Program (HMMP) for USACE and CDFW approval. If a Riparian HMMP is required, it shall contain the following items:</p> <ul style="list-style-type: none"> A. Responsibilities and qualifications of the personnel to implement and supervise the plan. The responsibilities of the Landowner, Specialists, and Maintenance Personnel that would supervise and implement the plan shall be specified. B. Site selection. The mitigation site shall be determined in coordination with the USACE, CDFW, and RWQCB. The site shall either be located in a dedicated open space area on County land, USFS land, or off-site land shall be purchased. C. Seed source. Seeds (or plantings) used shall be from local sources (within ten miles of the Project area) to ensure genetic integrity. D. Site preparation and planting implementation. Site preparation shall include (1) protection of existing native species; (2) trash and weed removal; (3) native species salvage and reuse (i.e., duff); (4) soil treatments (i.e., imprinting, decompacting); (5) temporary irrigation installation; (6) erosion-control measures (i.e., rice or willow wattles); (7) seed mix application; and (8) container species planting. E. Schedule. A schedule shall be developed which includes planting in late fall and early winter, between October 1 and January 30. F. Maintenance Plan/Guidelines. The Maintenance Plan shall include (1) weed control; (2) herbivory control; (3) trash removal; (4) irrigation system maintenance; (5) maintenance training; and (6) replacement planting. G. Monitoring plan. The Monitoring Plan shall include (1) qualitative monitoring (i.e., photographs and general observations); (2) quantitative monitoring (i.e., randomly placed transects); (3) performance criteria, as approved by the above-listed resource agencies; (4) monthly reports for the first year and reports quarterly thereafter; and (5) annual reports for five years, which shall be submitted to the resource agencies on an annual basis. The site shall be monitored and maintained for five years to ensure successful 			

**TABLE 3-1
MITIGATION MONITORING AND REPORTING PROGRAM**

Mitigation Measures	Mitigation Timing	Responsible Agency/Party	Monitoring Agency/Party
<p>establishment of riparian habitat within the restored and created areas.</p> <p>H. Long-term preservation. Long-term preservation of the site shall also be outlined in the conceptual Mitigation Plan to ensure the mitigation site is not impacted by future development.</p>			
Cultural Resources (Section 4.4 of the EIR)			
<p>PDF CUL-1 The Project site boundaries, as defined, exclude the two hangars, which have been previously evaluated and appear eligible for listing in the National Register of Historic Places (NRHP). The Contractor's Specifications will require that none of the Polaris Flight Academy Historic District's contributing buildings or structures would be impacted by the Project.</p>	<p>Prior to approval of contractor's specifications and During construction activities</p>	<p>Design-Builder</p>	<p>County of Los Angeles Department of Public Works</p>
<p>RR CUL-1 All construction activities will be conducted in accordance with Section 7050.5 of the California Health and Safety Code regarding the potential discovery of human remains. If applicable, the Native American Heritage Commission (NAHC) will be responsible for designating the most likely descendant (MLD), as required by Section 5097.98 of the California Public Resources Code. If the landowner rejects the recommendations of the MLD, the burial location would be determined in compliance with California Public Resources Code, Section 5097.98.</p>	<p>During ground disturbance (e.g., grading, trenching or excavation activities)</p>	<p>Design-Builder</p>	<p>County of Los Angeles Department of Public Works Archaeologist and Native American Heritage Commission, if applicable</p>
<p>MM CUL-1 Prior to the start of construction activities, a qualified Archaeologist shall be retained by the County to attend the pre-grading meeting with the construction contractor to establish, based on the site plans, appropriate procedures for monitoring earth-moving activities during construction. The Archaeologist shall determine, based on consultation with the County, when monitoring of grading activities is needed. Monitoring should observe disturbance in the uppermost layers of sediment including the younger Quaternary Alluvium (i.e. approximately 5 feet below ground surface or shallower) and if any archaeological resources are discovered, construction activities must cease within 50 feet of the discovery, as appropriate, and they shall be protected from further disturbance until the qualified Archaeologist evaluates them using standard archaeological protocols. The Archaeologist must first</p>	<p>Pre-grade meeting orientation and During grading and excavation activities, if needed</p>	<p>Archaeologist</p>	<p>County of Los Angeles Department of Public Works</p>

**TABLE 3-1
MITIGATION MONITORING AND REPORTING PROGRAM**

Mitigation Measures	Mitigation Timing	Responsible Agency/Party	Monitoring Agency/Party
<p>determine whether an archaeological resource uncovered during construction is a "Tribal Cultural Resources" pursuant to Section 21074 of the California Public Resources Code, or a "unique archaeological resource" pursuant to Section 21083.2(g) of the California Public Resources Code or a "historical resource" pursuant to Section 15064.5(a) of the State CEQA Guidelines. If the archaeological resource is determined to be a "Tribal Cultural Resource", "unique archaeological resource" or a "historical resource", the Archaeologist shall formulate a Mitigation Plan in consultation with the County of Los Angeles that satisfies the requirements of the above-listed Code Sections. Upon approval of the Mitigation Plan by the Los Angeles County Director of Public Works (DPW), the Project shall be implemented in compliance with the Plan.</p> <p>If the Archaeologist determines that the resource is not a "Tribal Cultural Resource", "unique archaeological resource" or "historical resource," s/he shall record the site and submit the recordation form to the California Historical Resources Information System (CHRIS) at the South Central Coastal Information Center (SCCIC). The Archaeologist shall prepare a report of the results of any study prepared as part of a testing or mitigation plan, following accepted professional practice. The report shall follow guidelines of the California Office of Historic Preservation. Copies of the report shall be submitted to the County and to the CHRIS at the SCCIC at the California State University, Fullerton.</p>			
<p>MM CUL-2 Prior to the start of ground disturbing activities in native soils, a qualified Paleontologist shall be notified and retained when earth-moving activities are anticipated to impact undisturbed deposits in the older Quaternary alluvium on the Project site (i.e. approximately 5 feet below ground surface or deeper). The designated Paleontologist shall be present during the pre-grade meeting to discuss paleontological sensitivity and to assess whether scientifically important fossils have the potential to be encountered. The Paleontologist shall determine, based on consultation with the County, when monitoring of grading activities is needed based on the on-site soils and final grading plans.</p> <p>All paleontological work to assess and/or recover a potential resource at the Project site shall be conducted under the direction of the qualified Paleontologist. If any fossil remains are uncovered</p>	<p>Prior to the commencement of ground-disturbing activities in native soils and During excavation activities in native soils deeper than five feet below ground surface</p>	<p>Paleontologist</p>	<p>County of Los Angeles Department of Public Works</p>

**TABLE 3-1
MITIGATION MONITORING AND REPORTING PROGRAM**

Mitigation Measures	Mitigation Timing	Responsible Agency/Party	Monitoring Agency/Party
<p>during earth-moving activities, all heavy equipment shall be diverted at least 50 feet from the fossil site until the monitor has had an opportunity to examine the remains and determines that earthmoving can resume. The extent of land area that is prohibited from disturbance shall be at the discretion of the Paleontological monitor. Samples of older Quaternary alluvium shall be collected as necessary for processing and shall be examined for very small vertebrate fossils. The Paleontologist shall prepare a report of the results of any findings following accepted professional practice.</p>			
Geology and Soils (Section 4.5 of the EIR)			
<p>RR GEO-1 The Project will be designed and constructed in accordance with the Los Angeles County's Building Code, which adopts the California Building Code (CBC), which is based on the International Building Code (IBC). New construction, alteration, or rehabilitation shall comply with applicable ordinances set forth by the County and/or by the most recent County building and seismic codes in effect at the time of project design. In accordance with Section 1803.2 of the 2013 CBC, a geotechnical investigation is required that must evaluate soil classification, slope stability, soil strength, position and adequacy of load-bearing soils, the effect of moisture variation on soil-bearing capacity, compressibility, liquefaction, and expansiveness, as necessary, determined by the County Building Official. The geotechnical investigation must be prepared by registered professionals (i.e., California Registered Civil Engineer or Certified Engineering Geologist). Recommendations of the report, as they pertain to structural design and construction recommendations for earthwork, grading, slopes, foundations, pavements, and other necessary geologic and seismic considerations, must be incorporated into the design and construction of the Project.</p>	<p>Prior to approval of final site plans and During construction activities</p>	<p>Design-Builder</p>	<p>County of Los Angeles Department of Public Works</p>
Greenhouse Gas Emissions (Section 4.6 of the EIR)			
<p>PDF GHG-1 Up to 1 megawatt (MW) of the Project's electricity demands will be offset through the County's existing 2-megawatt (MW) solar energy facility located immediately east of the Project site. The Contractor's Specifications will require that this County-owned renewable energy source will off-set the Project's electrical</p>	<p>Prior to approval of contractor's specifications and</p>	<p>Design-Builder</p>	<p>County of Los Angeles Department of Public Works</p>

**TABLE 3-1
MITIGATION MONITORING AND REPORTING PROGRAM**

Mitigation Measures	Mitigation Timing	Responsible Agency/Party	Monitoring Agency/Party
demands throughout construction as well as long-term operations.	During construction activities		
PDF GHG-2 The Contractor's Specifications will require that the Project will provide a combined minimum of 34 video-visiting stations on-site, along with video interview rooms in transitional housing buildings.	Prior to approval of contractor's specifications and During construction activities	Design-Builder	County of Los Angeles Department of Public Works
PDF GHG-3 The Project site will have the Antelope Valley Transit Authority (AVTA) bus and Metrolink schedules posted, as well as the locations of the nearest Park-and-Ride lots, in areas visible to visitors and in the Staff Services building to encourage the use of public transportation by staff and visitors. AVTA bus and Metrolink schedule information will be updated to ensure accuracy.	Prior to issuance of occupancy permit and Ongoing, every six months thereafter	County of Los Angeles Sheriff's Department	County of Los Angeles Sheriff's Department
PDF GHG-4 The Contractor's Specifications will require that the Project will incorporate (1) a secure storage area for staff to store bicycles into the Project design plans that allow for the individual locking of bicycles and protection from sun and inclement weather, and (2) bicycle rack(s) adjacent to the Visitor Parking Lot that allows for the individual locking of bicycles.	Prior to approval of contractor's specifications and During construction activities	Design-Builder	County of Los Angeles Department of Public Works
RR GHG-1 The Project will be designed and constructed in accordance with the Los Angeles County Code (Title 22, Section 22.52.2130), which requires all new buildings that are greater than 10,000 square feet (sf) and less than 25,000 sf in area will be designed and constructed to achieve the equivalency of a Leadership in Energy and Environmental Design (LEED™) certification; buildings of 25,000 sf or greater will achieve the equivalency of a LEED Silver certification. The Project will comply with Title 22 (Section 22.52.2200 et seq., Drought Tolerant Landscaping; and Section 22.52.2100, Green Building).	Prior to approval of contractor's specifications and During construction activities	Design-Builder	County of Los Angeles Department of Public Works
RR GHG-2 The Project will be designed and constructed in accordance with the California Code of Regulations, Title 24 Building Energy Efficiency Program, which establishes a minimum level of building energy efficiency and requires energy efficient measures, including ventilation, insulation, and construction and the use of energy-saving appliances, conditioning systems, water heating, and lighting.	Prior to approval of contractor's specifications and During construction activities	Design-Builder	County of Los Angeles Department of Public Works

**TABLE 3-1
MITIGATION MONITORING AND REPORTING PROGRAM**

Mitigation Measures	Mitigation Timing	Responsible Agency/Party	Monitoring Agency/Party
RR GHG-3 The Project will be designed and constructed in accordance with the Los Angeles County Code (Title 31, including but not limited to, Section 301.2.1 Low-rise Residential Buildings, and Section 301.3.1, Nonresidential Buildings greater than or equal to 25,000 square feet.), Section 4.106.5, Landscape Design, and Section 5.106.3, Low Impact Development or the current County code requirements in place at the time of Project design and construction. Title 31 requires project designs and practices that will result in the conservation of water and energy resources, such as measures for building commissioning, clean vehicle parking, and solid waste recycling.	Prior to approval of contractor's specifications and During construction activities	Design-Builder	County of Los Angeles Department of Public Works
RR GHG-4 The Project will include an Employee Commute Reduction Plan (ECRP), commonly known as the Rideshare Plan, in accordance with Los Angeles County Code Chapter 5.9, Vehicle Trip Reduction. The ECRP will specify the measures to be implemented at MLWDC to achieve the target average vehicle ridership performance goal for employee vehicles subject to the Ordinance.	Prior to issuance of occupancy permit	County of Los Angeles Sheriff's Department	County of Los Angeles Sheriff's Department
RR GHG-5 The Project will be subject to any project direction adopted by the Board of Supervisors based upon the findings of the Advisory Board's evaluation of strategies to reduce negative impacts of operating the MLWDC away from the downtown Los Angeles area, including contract transportation for visitors, videoconferencing for attorney consultation, and reviewing national best practices for visiting and family reunification.	Ongoing, throughout operations	Gender Responsive Advisory Committee	County of Los Angeles Sheriff's Department
Hazards and Hazardous Materials (Section 4.7 of the EIR)			
RR HAZ-1 Any Project-related hazardous materials and hazardous wastes will be transported to and/or from the Project in compliance with any applicable State and federal requirements, including the U.S. Department of Transportation regulations listed in the Code of Federal Regulations (Title 49, Hazardous Materials Transportation Act); California Department of Transportation (Caltrans) standards; and the California Occupational Safety and Health Administration (CalOSHA) standards.	During construction activities	Design-Builder	County of Los Angeles Department of Public Works

**TABLE 3-1
MITIGATION MONITORING AND REPORTING PROGRAM**

Mitigation Measures	Mitigation Timing	Responsible Agency/Party	Monitoring Agency/Party
<p>RR HAZ-2 Any Project-related hazardous waste generation, transportation, treatment, storage, and disposal will be conducted in compliance with the Subtitle C of the Resource Conservation and Recovery Act (RCRA) (Code of Federal Regulations, Title 40, Part 263), including the management of non-hazardous solid wastes and underground tanks storing petroleum and other hazardous substances. The Project will be designed and constructed in accordance with the regulations of the Los Angeles County Fire Department, which serves as the designated CUPA and which implements State and federal regulations for the following programs: (1) Hazardous Waste Generator Program, (2) Hazardous Materials Release Response Plans and Inventory Program, (3) CalARP, (4) AST Program, and (5) UST Program.</p>	<p>Prior to approval of final designs and During construction activities</p>	<p>Design-Builder</p>	<p>County of Los Angeles Department of Public Works and County of Los Angeles Fire Department, as the CUPA, if required</p>
<p>RR HAZ-3 Any Project-related underground storage tank (UST) repairs and/or removals will be conducted in accordance with the California Underground Storage Tank Regulations (Title 23, Chapter 16 of the California Code of Regulations). Any unauthorized release of hazardous materials will require release reporting, initial abatement, and corrective actions that will be completed with oversight from the RWQCB, DTSC, LACFD, SCAQMD and/or other regulatory agencies, as necessary. Any Project-related use of existing USTs will also have to be conducted (i.e., used, maintained and monitored) in accordance with the California Underground Storage Tank Regulations (Title 23, Chapter 16 of the California Code of Regulations).</p>	<p>During construction activities</p>	<p>County of Los Angeles Sheriff's Department</p>	<p>County of Los Angeles Sheriff's Department and County of Los Angeles Fire Department, as the CUPA, if required</p>
<p>RR HAZ-4 Any Project-related demolition activities that have the potential to expose construction workers and/or the public to asbestos-containing materials (ACMs) or lead-based paint (LBP) will be conducted in accordance with applicable regulations, including, but not limited to:</p> <ul style="list-style-type: none"> • Antelope Valley Air Quality Management District's (AVAQMD's) Rule 1403 • California Health and Safety Code (Section 39650 et seq.) • California Code of Regulations (Title 8, Section 1529) • California Occupational Safety and Health Administration (CalOSHA) regulations (California Code of Regulations, Title 8, Section 1529 [Asbestos] and Section 1532.1 [Lead]) 	<p>During demolition activities</p>	<p>Design-Builder</p>	<p>County of Los Angeles Department of Public Works</p>

**TABLE 3-1
MITIGATION MONITORING AND REPORTING PROGRAM**

Mitigation Measures	Mitigation Timing	Responsible Agency/Party	Monitoring Agency/Party
RR HAZ-5 Any Project-related new construction, excavations, and/or new utility lines within 10 feet or crossing existing high pressure pipelines, natural gas/petroleum pipelines, electrical lines greater than 60,000 volts, will be designed and constructed in accordance with the California Code of Regulations (Title 8, Section 1541).	During construction activities	Design-Builder	County of Los Angeles Department of Public Works
RR HAZ-6 The Project will be designed and constructed in accordance with Part 77 of the Federal Aviation Regulations (FAR), which requires the County to notify the Federal Aviation Administration of proposed construction or alteration within 20,000 feet from the nearest point of the nearest runway of an airport where the structure would extend into a slope of a 100:1 and within 5,000 feet of a heliport where the structure would extend into a slope of a 25:1 from the nearest landing and take-off area of the heliport.	Prior to approval of final designs and During construction activities	Design-Builder	County of Los Angeles Department of Public Works
RR HAZ-7 The radio communications tower shall be subject to review by the Los Angeles County Airport Land Use Commission for compliance with the General William J. Fox Airfield Land Use Compatibility Plan.	Prior to approval of final designs	County of Los Angeles Department of Public Works	County of Los Angeles Department of Public Works and Los Angeles County Airport Land Use Commission
MM HAZ-1 In the event that building materials are encountered during construction activities that are suspected of being asbestos-containing materials (ACMs), these materials shall be assumed to contain asbestos and shall be handled, removed, transported and/or disposed in accordance with applicable ACM regulations, until such time that they can be sampled and evaluated for asbestos content. Prior to Project occupancy, an Operations and Maintenance (O&M) Plan shall be prepared by a CalOSHA-certified Asbestos Consultant and implemented by building maintenance staff who have undergone at least 16 hours of asbestos O&M training. The O&M Plan shall be subject to review and approval by the County of Los Angeles Director of Public Works and shall require periodic observation, inspection, and documentation by designated staff to ensure that ACMs do not become damaged and do not result in airborne asbestos fiber release. Any required removal of asbestos shall be made under the direction of a CalOSHA Certified Asbestos Consultant.	During construction activities and Prior to issuance of occupancy permit and Ongoing, throughout operations	Design-Builder and CalOSHA-certified Asbestos Consultant and County of Los Angeles Sheriff's Department	County of Los Angeles Department of Public Works and County of Los Angeles Sheriff's Department

**TABLE 3-1
MITIGATION MONITORING AND REPORTING PROGRAM**

Mitigation Measures	Mitigation Timing	Responsible Agency/Party	Monitoring Agency/Party
MM HAZ-2 In the event that painted or ceramic surfaces materials are encountered during construction activities that are suspected of containing lead and/or lead-based paint, these materials shall be assumed to contain lead in concentrations exceeding the Los Angeles County Department of Health Services' definition of 0.7 milligrams per square centimeter (mg/cm ² , or 600 parts per million) and shall be handled, removed, transported and/or disposed in accordance with applicable regulations for lead content, until such time that they can be sampled and evaluated for lead content.	During construction activities	Design-Builder	County of Los Angeles Department of Public Works
MM HAZ-3 Prior to the use of the off-site fueling station by any Project-related activities, including any construction activities, the underground storage tanks (USTs) at the off-site fueling station shall be tested and repaired as necessary, subject to inspection and approval by the Los Angeles County Fire Department, as the Certified Unified Program Agency (CUPA).	Prior to the use of the off-site fueling station	County of Los Angeles Department of Public Works	County of Los Angeles Department of Public Works and County of Los Angeles Fire Department, as the CUPA, if required
Hydrology and Water Quality (Section 4.8 of the EIR)			
PDF HYD-1 The Contractor's Specifications will require that the Project will be designed and constructed in accordance with the following requirements of the Los Angeles County Department of Public Works for the incorporation of source-control, site-design, and treatment-control BMPs to reduce pollutants in the storm water and to reduce runoff rates and volumes to match existing conditions: <ul style="list-style-type: none"> • 2002 Standard Urban Stormwater Mitigation Plan (SUSMP) • 2006 Hydrology Manual • 2009 County's Low Impact Development (LID) Standards Manual • 2010 Green Building Standards Code (California Code of Regulations Title 24, Part 11) • 2012 Best Management Practices Handbook 	Prior to approval of final designs and contractor's specifications and During construction activities	Design-Builder	County of Los Angeles Department of Public Works

**TABLE 3-1
MITIGATION MONITORING AND REPORTING PROGRAM**

Mitigation Measures	Mitigation Timing	Responsible Agency/Party	Monitoring Agency/Party
PDF HYD-2 The Contractor's Specifications will require that the Project will be designed and constructed in accordance with the County's Stormwater and Runoff Pollution Control Ordinance (Chapter 12.80 of the Los Angeles County Code), which prohibits illicit discharges; manages runoff into and from its Municipal Separate Storm Sewer Systems (MS4s); and requires BMPs for new development and major redevelopment projects.	Prior to approval of final designs and contractor's specifications and During construction activities	Design-Builder	County of Los Angeles Department of Public Works
RR HYD-1 The Project will be constructed in accordance with the National Pollutant Discharge Elimination System (NPDES) General Permit for Storm Water Discharges Associated with the Construction and Land Disturbance Activities, Order No 2009-0009-DWQ, NPDES No. CAS000002 (or the latest approved Construction General Permit). Compliance requires filing a Notice of Intent (NOI); a Risk Assessment; a Site Map; a Storm Water Pollution Prevention Plan (SWPPP) and associated Best Management Practices (BMPs); an annual fee; and a signed certification statement.	Prior to approval of final designs and contractor's specifications and During construction activities	Design-Builder	County of Los Angeles Department of Public Works
RR HYD-2 The Project will be constructed and operated in accordance with the National Pollutant Discharge Elimination System (NPDES) General Permit for Storm Water Discharges from Small Municipal Separate Storm Sewer Systems (MS4), Order No 2013-0001-DWQ, NPDES No. CAS000004 (or the latest approved MS4 General Permit). Compliance requires controls to reduce pollutants from the MS4 to the maximum extent practicable (MEP). The MEP standard requires Permittees to apply Best Management Practices (BMPs) that are effective in reducing or eliminating the discharge of pollutants to the waters of the U.S., and emphasizes pollutant reduction and source control BMPs to prevent pollutants from entering storm water runoff.	Prior to approval of final designs and contractor's specifications and During construction activities	Design-Builder	County of Los Angeles Department of Public Works
Land Use and Planning (Section 4.9 of the EIR)			
No PDF, RR or MM required.			
Noise (Section 4.10 of the EIR)			
PDF NOI-1 The Contractor's Specifications will require that the Project will use construction vehicles and equipment, either fixed or mobile, that will be equipped with properly operating and maintained mufflers (equivalent or better than original factory equipment), which will be	Prior to approval of contractor's specifications and	Design-Builder	County of Los Angeles Department of Public Works

**TABLE 3-1
MITIGATION MONITORING AND REPORTING PROGRAM**

Mitigation Measures	Mitigation Timing	Responsible Agency/Party	Monitoring Agency/Party
periodically inspected to ensure compliance. Equipment maintenance and staging areas will be located at least 450 feet from residences on 60th Street West.	During construction activities		
RR NOI-1 The Project will be constructed in accordance with Section 12.08.440 of the County Code, which prohibits construction activities that generate noise that could create a disturbance across a residential or commercial property line from occurring between 7:00 PM and 7:00 AM on weekdays, or at any time on Sunday or a federal holiday.	Prior to approval of contractor's specifications and During construction activities	Design-Builder	County of Los Angeles Department of Public Works
MM NOI-1 The County of Los Angeles Department of Public Works shall include the following requirement in the Contractor's Specifications: Stationary equipment, such as generators and air compressors, shall be located at least 450 feet from the residences on 60th Street West opposite the Project site. If stationary equipment use is required to be closer than 450 feet, the equipment shall include an enclosure or similar noise attenuation if needed to limit the average hourly daytime noise level at the nearest residential property line to 60 A-weighted decibels (dBA) or less. Proof of compliance, such as noise measurements during construction activities, shall be provided to the County of Los Angeles Department of Public Works within one week of the start of use of stationary equipment within 450 feet of a residence.	Prior to approval of contractor's specifications and During construction activities	Design-Builder	County of Los Angeles Department of Public Works
Population and Housing (Section 4.11 of the EIR)			
No PDF, RR or MM mitigation required.			
Public Services (Section 4.12 of the EIR)			
PDF PS-1 The Contractor's Specifications will require that the Project will include space to accommodate both indoor and outdoor recreational facilities for inmate use only, including a recreational building for indoor recreation (e.g., game tables and a craft room); a full sized sports court for volleyball and basketball; a soccer field; a running track; and gardening areas, for both vegetable and flower cultivation.	Prior to approval of final designs and contractor's specifications and During construction activities	Design-Builder	County of Los Angeles Department of Public Works

**TABLE 3-1
MITIGATION MONITORING AND REPORTING PROGRAM**

Mitigation Measures	Mitigation Timing	Responsible Agency/Party	Monitoring Agency/Party
<p>PDF PS-2 The Contractor's Specifications will require that the Project will include space to accommodate general education classes, computer training, general and vocational career technical education, career counseling, a learning resource center, a library and computer labs, and culinary classes that will be made available to the female inmate population and provided through on-site classrooms, library facilities, and computer labs.</p>	<p>Prior to approval of final designs and contractor's specifications and During construction activities</p>	<p>Design-Builder</p>	<p>County of Los Angeles Department of Public Works</p>
<p>PDF PS-3 The Contractor's Specifications will require that the Project will include space to accommodate a Medical Building and Inmate Processing Area that will provide medical screening; mental health screening; a pharmacy; dental care services; radiology; laboratory services; obstetrics and gynecological services; orthopedic and dermatology services; wellness, hygiene, and diseases prevention training; preventative medical care; sick call services; emergent care; annual medical and dental exams; and tele-medicine/tele-psychiatry services.</p>	<p>Prior to approval of final designs and contractor's specifications and During construction activities</p>	<p>Design-Builder</p>	<p>County of Los Angeles Department of Public Works</p>
<p>RR PS-1 The Project will be designed and constructed in accordance with the County of Los Angeles Fire Code (Los Angeles County Code, Title 32) and the regulations of the Los Angeles County Fire Department, which include standards for building construction that would reduce the creation of fire hazards and facilitate emergency response.</p>	<p>Prior to approval of final designs and contractor's specifications and During construction activities</p>	<p>Design-Builder</p>	<p>County of Los Angeles Department of Public Works</p>
<p>RR PS-2 The Project will be designed, constructed and operated in accordance with pertinent provisions of Title 15 of the California Code of Regulations (Crime Prevention and Corrections) and other applicable State and federal requirements. Title 15 (specifically Division 1, Chapter 1, Subchapter 4) outlines the minimum standards for local detention facilities, court holding facilities, temporary holding facilities, and law enforcement facilities, including lockups (a locked room or secure enclosure under the control of a peace officer or custodial officer and primarily used for the temporary confinement).</p>	<p>Prior to approval of final designs and contractor's specifications and During construction activities</p>	<p>Design-Builder</p>	<p>County of Los Angeles Department of Public Works</p>

**TABLE 3-1
MITIGATION MONITORING AND REPORTING PROGRAM**

Mitigation Measures	Mitigation Timing	Responsible Agency/Party	Monitoring Agency/Party
Transportation (Section 4.13 of the EIR)			
<p>PDF TRA-1 The Contractor's Specifications will require that the Vehicular access to the Project will be via two existing driveways: one at 60th Street West south of West Avenue I and one at West Avenue I. The site access driveways will be stop-sign controlled with a stop-sign facing the minor street approach (i.e., at the Project driveway). The Project driveways will have one inbound travel lane and one outbound travel lane. As determined by the County of Los Angeles Department of Public Works improvements to driveways to accommodate ingress/egress, including new curb and gutter improvements, may be required.</p>	<p>Prior to approval of final designs and contractor's specifications and During construction activities</p>	<p>Design-Builder</p>	<p>County of Los Angeles Department of Public Works</p>
<p>RR TRA-1 The Project's construction activities will be conducted in accordance with the provision of traffic-control devices in compliance with the Manual for Uniform Traffic Control Devices (MUTCD) to ensure traffic safety on public streets, highways, pedestrian walkways, and bikeways.</p>	<p>During construction activities</p>	<p>Design-Builder</p>	<p>County of Los Angeles Department of Public Works</p>
<p>RR TRA-2 The Project's construction activities on public rights-of-way will be conducted in accordance with the current Standard Specifications for Public Works Construction (Greenbook) and Additions and Amendments to the Standard Specifications for Public Works Construction (Graybook), including Traffic Control Provisions.</p>	<p>During construction activities</p>	<p>Design-Builder</p>	<p>County of Los Angeles Department of Public Works</p>
<p>RR TRA-3 For any off-site traffic or parking-related activities within the City of Lancaster, the Project's construction activities will be conducted in accordance with the City of Lancaster's Traffic Code (Title 10 of the Lancaster Municipal Code), related to vehicle parking on public roads; construction traffic signs and traffic control; and other related regulations.</p>	<p>During construction activities</p>	<p>Design-Builder</p>	<p>County of Los Angeles Department of Public Works</p>
Utilities and Service Systems (Section 4.14 of the EIR)			
<p>PDF UTL-1 The Contractor's Specifications will require that the Project will include the following on-site utility infrastructure improvements:</p> <ul style="list-style-type: none"> • New on-site fire and domestic/potable water pipelines that connect to all existing and new buildings, and includes new fire hydrants, as required by the County of Los Angeles Fire Department and/or Department of Public Works. 	<p>Prior to approval of final designs and contractor's specifications and During construction activities</p>	<p>Design-Builder</p>	<p>County of Los Angeles Department of Public Works</p>

**TABLE 3-1
MITIGATION MONITORING AND REPORTING PROGRAM**

Mitigation Measures	Mitigation Timing	Responsible Agency/Party	Monitoring Agency/Party
<ul style="list-style-type: none"> • New connections of the existing on-site sewage pipelines to ensure connection to new on-site buildings. • New on-site storm drainage pipelines and facilities that connect with existing storm drain infrastructure that complies with storm water quality and quality control requirements under the County's SUSMP, LID standards, and Green Building Standards Code. 			
<p>PDF UTL-2 The Contractor's Specifications will require that the Project will include a new off-site 12-inch water pipeline extension from the on-site water lines to the existing water main within West Avenue I. The extension will connect from either 60th Avenue West or from the northern boundary of the site near the helipad, to the existing 12-inch LACWWD 40-owned distribution pipeline in West Avenue I. Existing connections to existing groundwater wells and reservoirs located adjacent to 60th Street West will be severed. The Project's disconnection from the existing water distribution system will be conducted in such a manner as to ensure the integrity of the existing wells, pumps, reservoirs, and water lines for continued use by other County-owned facilities currently being served by this water system.</p>	<p>Prior to approval of final designs and contractor's specifications and During construction activities</p>	<p>Design-Builder</p>	<p>County of Los Angeles Department of Public Works</p>
<p>RR UTL-1 The Project will be designed, constructed and operated in accordance with the County of Los Angeles Sanitation District's (LACSD's) Wastewater Ordinance, all wastewater discharges into LACSD facilities shall be required to comply with the discharge standards set forth to protect the public sewage system.</p>	<p>Prior to approval of final designs and contractor's specifications and During construction activities</p>	<p>Design-Builder</p>	<p>County of Los Angeles Department of Public Works</p>
<p>RR UTL-2 The Project's water, sewer, storm drain, and other utility infrastructure improvements will be designed, constructed and operated in accordance with the applicable regulations set forth in the Los Angeles County Code, which incorporates by reference the California Building Code, the California Electrical Code, the California Mechanical Code, the California Plumbing Code, the California Fire Code, and the Green Building Standards Code.</p>	<p>Prior to approval of final designs and contractor's specifications and During construction activities</p>	<p>Design-Builder</p>	<p>County of Los Angeles Department of Public Works</p>

**TABLE 3-1
MITIGATION MONITORING AND REPORTING PROGRAM**

Mitigation Measures	Mitigation Timing	Responsible Agency/Party	Monitoring Agency/Party
RR UTL-3 The Project will be constructed in accordance with the County's Green Building Standards Code and Construction and Demolition Debris Recycling and Reuse Ordinance, which requires a minimum of 65 percent of the "non hazardous construction and demolition debris" (by weight or volume) to be recycled or reused unless a lower percentage is approved by the Director of Public Works.	Prior to approval of final designs and contractor's specifications and During construction activities	Design-Builder	County of Los Angeles Department of Public Works
RR UTL-4 The Project will be designed, constructed and operated in accordance with the County's Departmental Recycling Program Directives to implement waste reduction and recycling measures.	Prior to approval of final designs and contractor's specifications and During construction activities and Ongoing, throughout operations	Design-Builder and County of Los Angeles Sheriff's Department	County of Los Angeles Department of Public Works and County of Los Angeles Sheriff's Department
MM UTL-1 The County shall enter the New Water Supply Entitlement Acquisition program established by the County Waterworks District No. 40 (LACWWD No. 40) and pay a one-time deposit of \$10,000 per acre-foot of annual water demand from the Project for the acquisition of additional water supplies from Antelope Valley-East Kern Water Agency (AVEK) to serve the Project, pursuant to the August 13, 2013 Memorandum of Understanding between LACWWD No. 40 and AVEK.	Prior to issuance of occupancy permit	County of Los Angeles Department of Public Works	County of Los Angeles Department of Public Works and Los Angeles County Waterworks District No. 40
Energy (Section 4.15 of the EIR)			
No PDF, RR or MM required.			

**Findings and Facts in Support of Findings
for the Final Environmental Impact Report**

**County of Los Angeles
Mira Loma Women’s Detention Center Project**

SCH No. 2014091012

Prepared for | County of Los Angeles
Chief Executive Office
754 Kenneth Hahn Hall of Administration
500 West Temple Street
Los Angeles, California 90012

Prepared by | BonTerra Psomas
225 South Lake Avenue, Suite 1000
Pasadena, California 91101
T: (626) 351-2000 F: (626) 351-2030

September 2016



TABLE OF CONTENTS

<u>Section</u>	<u>Page</u>
1.0 Introduction	1
1.1 Statutory Requirements for Findings	1
1.2 Certification	2
1.3 Project Level Environmental Impact Report and Discretionary Actions	2
2.0 Procedural Compliance With California Environmental Quality Act.....	3
2.1 Public Notification and Outreach	3
2.1.1 Notice of Preparation, Initial Study, and Scoping	3
2.1.2 Public Review of Draft Environmental Impact Report and Public Outreach.....	4
2.1.3 Final Environmental Impact Report and Board of Supervisors Proceedings.....	7
2.1.4 Record of Proceedings and Custody of Documents.....	7
2.2 Project Introduction and Need	8
2.3 Description of the Project	10
2.4 Project Objectives	11
3.0 California Environmental Quality Act Findings.....	13
3.1 Findings On “No Impact” and “Less Than Significant Impacts”	13
3.1.1 Aesthetics	13
3.1.2 Air Quality	14
3.1.3 Biological Resources	17
3.1.4 Cultural Resources	17
3.1.5 Geology and Soils.....	18
3.1.6 Greenhouse Gas Emissions.....	20
3.1.7 Hazards and Hazardous Materials	21
3.1.8 Hydrology and Water Quality.....	24
3.1.9 Land Use and Planning	26
3.1.10 Noise	27
3.1.11 Population and Housing.....	28
3.1.12 Public Services and Recreation.....	29
3.1.13 Transportation/Traffic.....	31
3.1.14 Utilities and Service Systems	33
3.1.15 Energy	36
3.2 Issues Deemed No Impact or Less Than Significant Impact in the Initial Study/Notice of Preparation	37
3.3 Findings on Significant Environmental Impacts That Can Be Reduced to a Less Than Significant Level	37
3.3.1 Aesthetics	37
3.3.2 Biological Resources	38
3.3.3 Cultural Resources	42
3.3.4 Hazards and Hazardous Materials	45

3.3.5	Noise	47
3.3.6	Utilities and Service Systems	48
4.0	Significant Effects That Cannot be Mitigated to Below the Level of Significance	49
5.0	Findings on Project Alternatives	49
5.1	Alternatives Screened Out from Detailed Consideration in the Environmental Impact Report	49
5.2	Alternatives Analyzed in the Environmental Impact Report.....	52
5.2.1	Alternative 1A: No Project/Continuation of Existing Operations	52
5.2.2	Alternative 1B: No Project/Predictable Actions.....	54
5.2.3	Alternative 2: Alternate Location – New Women’s Facility at Pitchess Detention Center	55
5.2.4	Alternative 3: Alternate Location – New Annex at Century Regional Detention Facility.....	56
5.2.5	Alternative 4: Reduced Mira Loma Women’s Detention Center Capacity – No Expansion	57
5.2.6	Alternative 5: Two Separate Women’s Facilities (at Mira Loma Detention Center and Pitchess Detention Center South)	59
6.0	Findings on Responses to Comments on the Draft EIR and Revisions In the Final EIR	60

**CALIFORNIA ENVIRONMENTAL QUALITY ACT
FINDINGS AND FACTS IN SUPPORT OF FINDINGS
FOR THE FINAL MIRA LOMA WOMEN'S DETENTION CENTER PROJECT
ENVIRONMENTAL IMPACT REPORT**

1.0 INTRODUCTION

Pursuant to the California Environmental Quality Act (CEQA; *California Public Resources Code*, Section 21081), the potential environmental effects of the proposed Mira Loma Women's Detention Center Project (MLWDC or Project) have been analyzed in a Draft Environmental Impact Report (Draft EIR or EIR) (State Clearinghouse [SCH] No. 2014091012) dated November 2015. A Final EIR has also been prepared that incorporates the Draft EIR and contains the comments received on the Draft EIR, responses to the individual comments, revisions to the Draft EIR including any clarifications based on the comments and the responses to the comments, and the Mitigation Monitoring and Reporting Program for the Project.

1.1 STATUTORY REQUIREMENTS FOR FINDINGS

CEQA and the State CEQA Guidelines (Guidelines, *California Code of Regulations*, Title 14, Section 15091) require that no public agency approve or carry out a project for which an Environmental Impact Report (EIR) has been certified that identifies one or more significant effects of the project on the environment unless the public agency makes one or more written findings for each significant effect, accompanied by a brief explanation of the rationale of each finding. The possible findings, which must be supported by substantial evidence in the record, are:

- (1) Changes or alterations have been required in, or incorporated into, the project which mitigate or avoid the significant environmental effect as identified in the Final EIR.
- (2) Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can and should be adopted by such other agency.
- (3) Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or project alternatives identified in the Final EIR.

The County of Los Angeles (or County) as the lead agency pursuant to CEQA for the Project has made specific written findings regarding each potentially significant impact associated with the Project, which is discussed, along with a presentation of facts in support of the findings, in Sections 3.0, 4.0, 5.0 and 6.0 of this document. Not all findings listed above are required to be presented for each environmental impact (see Sections 3.0 and 4.0), for each alternative (see Section 5.0), or for the responses to comments (see Section 6.0); however, at least one finding must be made for each significant environmental effect.

The Draft EIR discloses the environmental impacts expected to result from the construction and operation of the Project, including an analysis of Project Alternatives, including the No Project Alternative. The Draft EIR discloses that prior to mitigation, Project implementation will result in potentially significant impacts to Aesthetics, Biological Resources, Cultural Resources, Hazards and Hazardous Materials, Noise, and Utilities and Services Systems. However, mitigation measures (MMs) have been developed that are feasible and which could reasonably be expected to reduce adverse impacts if required as conditions of approving the Project, as required by State

CEQA Guidelines Section 15126.4(a)(1). No significant unavoidable impacts will occur after mitigation. Therefore, a Statement of Overriding Considerations pursuant to State CEQA Guidelines Section 15093 is not required. Concurrent with the adoption of these findings, the County of Los Angeles will adopt the Mitigation Monitoring and Reporting Program (MMRP).

1.2 CERTIFICATION

The County of Los Angeles Board of Supervisors has received, reviewed, and considered the information contained in the Final EIR in addition to all public testimony received on the proposed Project and the recommendations of County staff. The County of Los Angeles Board of Supervisors hereby makes findings pursuant to and in accordance with Section 21081 of the *California Public Resources Code* and State CEQA Guidelines Sections 15090 and 15091 and hereby certifies that:

- (1) The Final EIR has been completed in compliance with CEQA;
- (2) The Final EIR was presented to the Board of Supervisors as the decision-making body of the County and that the decision-making body reviewed and considered the information contained in the Final EIR prior to approving the project; and
- (3) The Final EIR reflects the County's independent judgment and analysis.

1.3 PROJECT LEVEL ENVIRONMENTAL IMPACT REPORT AND DISCRETIONARY ACTIONS

The Final Mira Loma Women's Detention Center Project EIR (Final EIR) was prepared as a Project EIR pursuant to CEQA and the Guidelines. Section 15161 of the Guidelines states that a Project EIR is "[t]he most common type of EIR [and] examines the environmental impacts of a specific development project. This type of EIR should focus primarily on the changes in the environment that would result from the development project. The EIR shall examine all phases of the project including planning, construction, and operation."

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

- Approval of the Mira Loma Women's Detention Center Project and related actions such as allocating funding for the Project.
- Approval to award a design-build contract. The County Board of Supervisors can authorize the Los Angeles County Department of Public Works [LACDPW] to pursue implementation of the Project through the issuance of a design-build contract and other appropriate approved contracting methods.
- Authorization to complete state grant funding requirements for the Project including but not limited to the authority to enter into contracts, leases and easements with the State of California relating to the Project and the Project site.

2.0 PROCEDURAL COMPLIANCE WITH CALIFORNIA ENVIRONMENTAL QUALITY ACT

The County of Los Angeles (County) published a Draft EIR on November 9, 2015. A Final EIR was prepared in the summer of 2016 in compliance with CEQA requirements. The Final EIR has been prepared in accordance with CEQA and the State CEQA Guidelines, as amended. As authorized in State CEQA Guidelines Section 15084(d)(2), the County retained a consultant to assist with the preparation of the environmental documents. County staff from multiple departments including but not limited to the Sheriff, Department of Public Works, Department of Public Health, and the Chief Executive Office, representing the Lead Agency, have directed, reviewed, and modified where appropriate all material prepared by the consultant. The Final EIR reflects the County's independent analysis and judgment. The key milestones associated with the preparation of the EIR are summarized below. As presented below, an extensive public involvement and agency notification effort was conducted to solicit input on the scope and content of the EIR and to solicit comments on the results of the environmental analysis presented in the Draft EIR.

2.1 PUBLIC NOTIFICATION AND OUTREACH

2.1.1 Notice of Preparation, Initial Study, and Scoping

The County conducted the noticing and scoping for the proposed Project in accordance with State CEQA Guidelines Section 15082 to address the requirement to notify responsible and trustee agencies and the State Office of Planning and Research that an EIR will be prepared, and also in accordance with State CEQA Guidelines Section 15083 to include optional early public consultation during the Scoping period. An Initial Study and Notice of Preparation (NOP) of an EIR was made available for public review between September 5, 2014 and October 6, 2014, which included a notice of a Scoping Meeting. The NOP and Scoping Meeting notice were sent to all responsible/trustee agencies and individuals that had requested to be informed about the Project in order to solicit feedback from federal, State, regional, and local government agencies and interested parties on the scope and content of the Draft EIR for the Project. A notice announcing the availability of the Initial Study, NOP, and the Scoping Meeting was published in the *Antelope Valley Press* on September 5, 2014, and in the *Country Journal* on September 6, 2014, and on the *Antelope Valley Times* website from September 5 through September 11, 2014. Hard copies of the Initial Study and NOP were also made available at the Quartz Hill Library and the Lancaster Library.

The County then held a Scoping Meeting for the Draft EIR from 6:00 to 8:00 PM on September 18, 2014, at the American Heroes Park Community Room at 701 West Kettering Avenue in Lancaster, California. Comments on the NOP were received from 12 agencies, 159 letters/emails from individuals, and 6 comment cards, which are provided in Appendix A-2 of the Draft EIR. Blank self-addressed comment cards were provided by the County at the Scoping Meeting for the convenience of meeting attendees, but were not required to submit a comment on the Draft EIR. A total of 19 individuals (not including County employees) signed the attendance sheet for the Scoping Meeting, which is provided in Appendix A-3 of the Draft EIR. The specific issues that were contained in comments submitted on the NOP are summarized in Table 1-1 of Section 1.3.2 of the Draft EIR, with references that direct the reader to the appropriate EIR Section for the topic of concern.

When considering comments received during the NOP review period from agencies and individuals, the discussions held during the Scoping Meeting, as well as public testimony provided at various County of Los Angeles Board of Supervisors (BOS) meetings held throughout

2014–15, the primary areas of known controversy related to environmental concerns at the time of the issuance of the Notice of Availability (NOA) for the Draft EIR include, but are not limited to:

- Opposition to the expansion of any jail facilities in the County and opposition to incarceration in general, in favor of social and diversion programs;
- Decreased accessibility for families/visitors due to distance from the urban Los Angeles area;
- Increase in travel miles to the Antelope Valley and associated increase in traffic, impacts to public transportation, and vehicle emissions;
- Increase in population growth, requiring additional public services, schools, and utilities;
- Increased noise (e.g., construction, alarms, firing range);
- Deteriorated condition of Mira Loma Detention Center (MLDC) buildings;
- Impacts to historic resources related to the Polaris Flight Academy and impacts to Native American resources;
- Placement of inmates in the Antelope Valley due to air quality concerns (e.g., particulates and ozone);
- Potential exposure to Valley Fever spores through fugitive dust;
- Placement of inmates on former Polaris Flight Academy, which operated as a hazardous waste generator; and
- Groundwater overdraft, drought, and increase in demand for groundwater resources in the Antelope Valley.

2.1.2 Public Review of Draft Environmental Impact Report and Public Outreach

Upon completion of the Draft EIR, notice of the public review period was given in accordance with Section 15087 of the State CEQA Guidelines. In November 2015, a *Notice of Availability (NOA) of the Draft Environmental Impact Report and Notice of Public Meeting* was prepared and distributed to the State Office of Planning and Research, Los Angeles County Clerk, responsible and trustee agencies, organizations, interested parties, and all parties who requested a copy of the EIR in accordance with CEQA. The County decided to provide a voluntary extension beyond the CEQA-mandated 45-day public review period to account for the holiday season and to provide ample opportunity and time for the public to review the Draft EIR. Thus, comments on the Draft EIR were accepted during a 64-day public review period extending from Monday, November 9, 2015 through Tuesday, January 12, 2016.

The NOA was distributed to the mailing list and email list prepared for the Notice of Preparation (NOP) for the scoping stage of the proposed Project before issuance of the Draft EIR, and was augmented to include property owners within a 300-foot radius of the Project site, individuals requested to be added to the list, as well as individuals who had provided comments on the NOP. The NOA and Draft EIR were posted on the County's website for viewing and downloading at <ftp://dpwftp.co.la.ca.us/pub/PMD/MiraLomaWomenFacility>. Newspaper advertisements of the NOA and Draft EIR comment period and the information on a public meeting were placed in the following papers and ran on Monday, November 9, 2015:

- *Acton-Aqua Dolce News*: a weekly publication so the ad was available for 7 days.
- *Los Angeles Daily News*: a daily publication

- *Antelope Valley Press*: a daily publication
- *Antelope Valley Times*: an online publication

Hardcopies of the Draft EIR were available for public viewing at the following locations:

Quartz Hill Library
42018 North 50th Street
West
Quartz Hill, California 93536

Lancaster Library
601 West Lancaster
Boulevard
Lancaster, California 93534

Public Information Office
358 Kenneth Hahn Hall of
Administration
500 West Temple Street
Los Angeles, California 90012

The first of two public meetings was held to provide an overview of the Project and the conclusions of the Draft EIR and information on the comment process and to invite submission of public comments on the Draft EIR on Tuesday, December 8, 2015, from 6:00 PM to 8:00 PM at the James C. Gilley Lancaster National Soccer Center Eastside Activity Center, which is located at 43000 30th Street East in Lancaster, CA 93535. There were approximately 15 attendees at the first public meeting, and some submitted written comments. The notice for this meeting stated that attendance at this public meeting was voluntary and not required in order to submit comments on the Draft EIR.

Subsequently, in January 2016, in response to requests from the public to provide an additional extension of the public review period and an additional public meeting, a *Notice of Extended Comment Period for the Draft Environmental Impact Report for the Mira Loma Women's Detention Center Project and Notice of Second Public Meeting in Lancaster, California* (Notice) was sent to the 2015 NOA mailing list and email list, as well as additional mailing list contacts that had provided comment letters during the Draft EIR public review period up to the time of the mailing. This Notice extended the Draft EIR public review period from Monday, February 1, 2016, through Wednesday, March 2, 2016. This 30-day extension was in addition to the original 64-day Draft EIR public review period. All written comments received on the Draft EIR from Monday, November 9, 2015, through Wednesday, March 2, 2016, are responded to in the Final EIR.

The Notice extending the public review period was provided in both English and Spanish as requested by some members of the public. Additionally, the Executive Summary of the Draft EIR was translated into Spanish and posted on the County's website for viewing and downloading. Hardcopies of the Spanish-translated Executive Summary were made available, in addition to the Draft EIR, at the Quartz Hill and Lancaster Libraries, and the Los Angeles County Public Information Office. Newspaper advertisements of the extended comment period and second public meeting were placed in the following papers and ran on Monday, February 1, 2016:

- *Acton-Aqua Dolce News*: a weekly publication (the ad was available for 7 days)
- *Los Angeles Daily News*: a daily publication
- *La Opinion*: a daily publication (the ad was in both English and Spanish)
- *Antelope Valley Press*: a daily publication
- *Antelope Valley Times*: an online publication

The second public meeting was held on Tuesday, February 9, 2016, at the Lancaster Public Library at 601 West Lancaster Boulevard in Lancaster, CA 93534 to provide an overview of the Project, the conclusions of the Draft EIR, and information on the comment process, and to invite submission of public comments on the Draft EIR. Real-time Spanish translation services were made available, as also requested by members of the public, as were copies of the Notice and

the Executive Summary in both English and Spanish. This second public meeting had two attendees from the public and neither requested available translation services.

In summary, the County conducted all required noticing and scoping for the proposed Project in accordance with Section 15083 of the State CEQA Guidelines, and conducted the public review for the Draft EIR in compliance with Section 15087 of the State CEQA Guidelines. The two public meetings, as well as the extension of the public review period until March 2, 2016, exceeded the requirements of CEQA.

During the comment period, written comments on the Draft EIR were received by the County of Los Angeles Chief Executive Office. Letters commenting on the information and analysis in the Draft EIR were received from various parties during the initial 64-day public review period (i.e., Monday, November 9, 2015 through Tuesday, January 12, 2016). Additional comments were received when the public review period was subsequently extended to March 2, 2016. A total of 295 comment letters were received, including 5 letters from public agencies, 7 letters from organizations, and 283 letters from individuals. Blank self-addressed comment cards were also made available for convenience during the public meetings held on December 8, 2015 and February 9, 2016 in the City of Lancaster.

The majority of the comments received on the Draft EIR during the public review period and during the public meetings were very similar in theme and issue topics to those raised during scoping review and early public outreach before preparation of the Draft EIR, discussed above in Section 2.1.1, Notice of Preparation, Initial Study, and Scoping. In summary, most of the issues/concerns/comments raised during the Draft EIR public review period can be generally categorized as including but not limited to the following:

- Opposition to the expansion of any jail facilities in the County and opposition to incarceration in general, in favor of social and diversion programs;
- The MLWDC Project would be unnecessary with increased implementation of out-of-custody programs (e.g. diversion, bail/bond reform, reduction of jail population);
- Decreased accessibility for families/visitors due to distance from the urban Los Angeles area;
- Increase in travel miles to the Antelope Valley and associated increase in traffic, impacts to public transportation, and vehicle emissions;
- Potential exposure of employees and inmates to Valley Fever spores through fugitive dust;
- Potential exposure of employees and inmates to hazardous materials on the site, including in underground storage tanks, that could lead to soil/groundwater contamination; and
- Groundwater overdraft, drought, and increase in demand for groundwater resources in the Antelope Valley.

The County has reviewed all comments and has determined that no substantial new environmental issues have been raised and that all issues raised in the comments have been adequately addressed in the Draft EIR and/or in the Responses to Comments, Mitigation Monitoring and Reporting Program and Revisions, Clarifications, and Corrections to the Draft EIR. All potential impacts associated with the proposed Project were found to be less than significant with incorporation of relevant mitigation measures, where applicable. Therefore, the EIR concludes that the proposed Project would not result in any significant impacts.

2.1.3 Final Environmental Impact Report and Board of Supervisors Proceedings

The Final EIR for the proposed Project dated September 2016 consists of the following documents:

- Draft EIR and Technical Appendices dated November 2015
- Responses to Comments, Mitigation Monitoring and Reporting Program and Revisions, Clarifications, and Corrections to the Draft EIR, which includes:
 - A list of persons, organizations, and public agencies that commented as well as the verbatim comments received on the Draft EIR;
 - Responses to written comments on the Draft EIR; and
 - Other information beyond the scope of CEQA provided by the County for context and information to the decision makers, agencies and the public.

Members of the public can view searchable agendas for scheduled Board of Supervisors meetings and access agenda-related County information and services directly on the following website: [http://bos.lacounty.gov/Board-Meeting/Board agendas](http://bos.lacounty.gov/Board-Meeting/Board%20agendas). This site has an email notification service enrollment process for copies of future Board of Supervisors agendas.

The Final EIR document was posted for viewing and download with the previously posted Draft EIR prior to the County's consideration of the Final EIR and Project recommendations on the same website noted above for the posting of the Draft EIR: <ftp://dpwftp.co.la.ca.us/pub/PMD/MiraLomaWomenFacility>. Hard copies were provided for public viewing at the same locations used for the distribution of the Draft EIR.

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

2.1.4 Record of Proceedings and Custody of Documents

For purposes of CEQA and these findings, the Record of Proceedings for the proposed Project consists of the following documents and other evidence, at a minimum:

- NOP, NOA, and all other public notices issued by the County in conjunction with the proposed Project;
- The Final EIR for the proposed Project, including the MMRP;
- All written comments submitted by agencies and members of the public during the Draft EIR public review comment periods;
- All responses to written comments submitted by agencies and members of the public during the Draft EIR public review comment periods;
- The reports and technical memoranda included or referenced in the Responses to Comments of the Final EIR;
- All documents, studies, EIRs, or other materials incorporated by reference in the Draft EIR and Final EIR;

- Matters of common knowledge to the County, including, but not limited to, federal, State, and local laws and regulations;
- Any documents expressly cited in these Findings or the Final EIR; and
- Any other relevant materials required to be in the record of proceedings by *California Public Resources Code* Section 21167.6(e).

The documents and other materials that constitute the record of proceedings on which the Project findings are based are located at the Public Information Office, 358 Kenneth Hahn Hall of Administration, 500 West Temple Street, Los Angeles, California 90012. The custodian for these documents is Los Angeles County Chief Executive Office. This information is provided in compliance with *California Public Resources Code* Section 21081.6(a)(2) and State CEQA Guidelines Section 15091(e).

2.2 PROJECT INTRODUCTION AND NEED

The proposed MLWDC Project will involve the reuse and expansion of the majority of the currently unoccupied MLDC property to provide a total of 1,604 beds for low- to medium-security female inmates on County owned property in the City of Lancaster, California. Qualifying female inmates will be transferred from the County's Century Regional Detention Facility (CRDF) in Lynwood, California to the MLWDC in Lancaster.

The Los Angeles County Sheriff's Department is able to manage the inmate population through policy decisions that allow for demand to be balanced in light of available capacity. As described in the *Los Angeles County Jail Plan Independent Review and Comprehensive Report* (Jail Plan Report), as of March 2013, the total number of female inmates housed at CRDF was 2,025, of which 1,596 were low- to medium-security and would be eligible to be housed at the MLWDC. As of March 2013, the total number of female inmates housed at Twin Towers Correctional Facility (TTCF) was 38. The Jail Plan Report did not itemize the categorization of inmates at TTCF, but stated that the female population is approximately 1 percent of the total TTCF population (Vanir 2013). Based on this percentage, 15 low- to medium-security female inmates would be eligible to be housed at the MLWDC. Therefore, based on March 2013 data, approximately 1,611 female inmates (1,596 inmates at CRDF and 15 inmates at TTCF) would have been eligible for transfer to the MLWDC in 2013.

The Jail Plan Report determined that, in light of trends analyzed for population, crime rates, arrests, bookings, and projections of the Assembly Bill (AB) 109 inmate population as "N3" (i.e., non-violent, non-serious, non-sexual), the Los Angeles County Jail system is projected to remain at or near its current inmate population level. Because the County's inmate population varies from day to day and the total inmate population is also affected by policy decisions, the 1,604-bed capacity of the proposed MLWDC Project was determined to be adequate and appropriate to serve the eligible female population within the County jail system.

The integration of gender-responsive female inmate education, treatment, and vocational training contribute to achieving the project objective of reducing female inmate recidivism. This could be achieved through programming and development of a women's detention facility with sufficient space to accommodate both campus-style inmate housing and support facilities for education and vocational training, while implementing the best practices of Education-Based Incarceration (EBI), within a secured detention perimeter. Thus, providing a women's facility to accommodate Gender Responsive Rehabilitation (GRR) model programming for eligible low- to medium-security female inmates would maximize system-wide efficiencies for County jails. The MLWDC would implement both of these programs.

The *Los Angeles County Jail Plan Independent Review and Comprehensive Report* (Jail Plan Report) provided a conceptual evaluation of the needs of the County jail system, including a list of Jail Plan Options for the County of Los Angeles Board of Supervisors (Board) to consider. On July 16, 2013, the Board provided direction to various County departments regarding items related to the Jail Plan Report, including direction for the Chief Executive Officer (CEO) to make a formal inquiry with the BSCC about the conditions upon which the Assembly Bill (AB) 900 funds could be used other than for the existing Pitchess Detention Center (PDC) facility. The AB 900 grant would be used to augment the Project budget for implementation and to increase bed capacity to 1,604 beds for purposes of this proposed Project Description for the proposed MLWDC Project. On October 22, 2013, the Board approved a proposal to use a portion of the MLDC property as the site for the female detention facility in lieu of the PDC site previously proposed by the Board for evaluation.

In September 2015, the Board reviewed the capacity of the proposals for the building projects in the jail program. The Board confirmed a complementary approach of a funded diversion program, including establishment of a new Office of Diversion and Re-entry, with the continued evaluation of 1,604 inmate beds for eligible female inmates. At the same time, the Board of Supervisors directed the establishment of an Advisory Board (now called the Gender Responsive Advisory Committee) that will report to the Board of Supervisors on specific programmatic and operational issues. The Advisory Committee has already begun to organize its meetings with a membership including representatives of County staff, outside agencies, advocates, organizations, individuals with incarceration experience, and representatives with expertise in reducing recidivism of female inmates. As part of its charge, the Advisory Board is tasked with reviewing the program model for the proposed MLWDC Project to ensure that it is evidence-based in reducing recidivism; evaluating strategies to reduce negative impacts of operating the proposed MLWDC away from the downtown Los Angeles area, including contract transportation for visitors, video visiting for attorney consultation; and reviewing national best practices for visiting and family reunification.

The goal of the proposed Project is to provide detention facilities for low- to medium-security-level female inmates that meet modern correctional standards and that prioritize the on-site integration of gender-responsive female inmate education, treatment, and vocational training. This goal focuses on providing a secure detention facility with cost-effective therapeutic and rehabilitative programs to meet the needs of eligible female inmates in order to reduce recidivism.

The Board of Supervisors has adopted numerous recent actions to reduce the number of people who are incarcerated in Los Angeles County, particularly those with mental illness and/or substance use disorders. The Board of Supervisors' 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 in a document entitled "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".

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 Countywide Criminal Justice Coordination Committee. All Advisory Board members participated in the Countywide 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 of Los Angeles Chief Executive Office (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 Re-Entry (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 of Supervisors determined the Office will be a part of the Department of Health Services and the Director of the Office will report to the Director of the Department of Health Services. The Director of this Office will be 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 will oversee Countywide 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 of Supervisors directed that future budget allocations be a part of the annual budget process. On September 1, 2015, the Board of Supervisors also directed that the Office distribute funding so at least 1,000 individuals would be diverted across all intercept points within the criminal justice system.

The Criminal Justice Mental Health Advisory Board report of August 2015 concluded that, even with increased opportunities for diversion from a jail environment, there will still be a need for mental health treatment in jails and that diversion efforts can reduce, but will not eliminate, the need for the County to operate detention facilities (LACDA 2015). In light of the County's diversion efforts, the Board of Supervisors directed that, for purposes of ongoing study and evaluation in the environmental review process, the maximum size of the proposed women's detention center at Mira Loma in Lancaster would remain at 1,604 beds. In addition, the Board of Supervisors reduced the maximum proposed size by approximately 1,000 beds, for purposes of the environmental review of a separate proposed treatment and detention center addressing needs of incarcerated men and women with mental illness and/or substance use disorders at the site of the current Men's Central Jail in downtown Los Angeles. In summary, the Board of Supervisors has taken steps to reduce the number of people who are incarcerated in Los Angeles County.

2.3 DESCRIPTION OF THE PROJECT

The MLWDC Project would involve the reuse, renovation, and expansion of the majority of the currently unoccupied MLDC property to provide a total of 1,604 beds for low- to medium-security female inmates. The Project proposes the adaptive reuse, renovation, and expansion of the majority of the buildings at MLDC, which would remain unoccupied during construction activities. Some buildings would be demolished to accommodate the new site plan, which includes new

building and facility construction. The majority of the buildings would be renovated and/or expanded, making use of the majority of the existing buildings and infrastructure on the Project site.

The Project would provide detention services within a secured custody setting (e.g., security fencing, guard towers). The Project would include dormitory housing in twinned barracks (896 beds), single barracks (68 beds), new transitional housing (384 beds), and Barracks E and F (256 beds), along with facilities for other support services (e.g., administration, visitation, kitchen, inmate processing, laundry, medical, education, recreation, and maintenance). In total, the Project would include approximately 365,210 gross square feet (gsf) of building space.

The Project would be designed to deliver a more normative environment to assist in the transition of female inmates from detention to release into independent living. To provide for an education-based incarceration, the Project would offer general education classes, computer training, general and vocational career technical education, career counseling, a learning resource center, culinary classes, and indoor/outdoor recreation for inmates. All facilities would be enclosed within secured and guarded perimeter fencing.

In order to meet the standards of the BSCC and long-term occupancy at the MLWDC, utility and infrastructure repairs and upgrades would be required for the Project site's water infrastructure; sewer infrastructure; storm drain infrastructure; heating, ventilation, and air conditioning (HVAC) system; and electrical facilities. A new water line connection would link the Project site to the Los Angeles County Waterworks District (LACWWD) 40 water line within West Avenue I. Water service from the existing on-site water wells and storage tanks would be disconnected.

Upon completion of the Project, low- to medium-security female inmates would be transferred to the Project site from the CRDF in Lynwood. The County's remaining female inmate population, who are not in low- to medium-security classifications, or who require medical or other services not available at the Project site, would be housed at other jail facilities that have appropriate services to meet their needs.

The Project would be staffed by approximately 523 employees in total, which includes County Sheriff's Department security/sworn staff, Sheriff's Department civilian staff, teachers, counselors, maintenance personnel, physicians, registered nurses, registered nurse practitioners, and other County employees and contractors. A number of community-based volunteers are also anticipated at the site to provide training and assist with visitation.

2.4 PROJECT OBJECTIVES

The objectives of the Project are as follows:

- A. To prioritize the on-site integration of gender-responsive female inmate education, treatment, and vocational training to reduce female inmate recidivism.
 - 1. To maximize system-wide efficiencies for County jails by providing a women's facility to permit Gender Responsive Rehabilitation (GRR) model programming for eligible low- to medium-security female inmates.
 - 2. To provide a facility reflective of "real world" living that incorporates abundant natural light, opportunities for social interactions in landscaped open spaces, and defined functional areas to promote release readiness and community reintegration within a secured detention perimeter.

3. To reduce recidivism through programming and development of a women's detention facility at a site with sufficient space to accommodate both campus-style inmate housing and support facilities for education and vocational training, implementing the best practices of Education Based Incarceration (EBI), within a secured detention perimeter.
- B. To provide a detention facility with capacity for eligible low- to medium-security level female inmates.
4. To permit re-allocation of detention facilities designed for higher security levels for male inmates and/or inmates with special security or other needs to serve the appropriate security-level populations.
 5. To provide a facility with adequate capacity for a selected subset of the female inmate population based on security level and health status based on system trend analysis from data for 2001-2013, which includes the beginning of the "AB 109" population of Low – Level (N3) Offender Population, and later state law changes.
 6. To reduce inmate overcrowding according to the BSCC standards for rated capacity, as determined for the qualifying female inmate population.
- C. To maximize the financial resources available to the County's correctional system for construction and operation of jail facilities serving female inmates.
7. To avoid or minimize land acquisition and entitlement costs and to efficiently use existing County-owned physical assets.
 8. To avoid or minimize costs and delays to resolve easement and other land title clearances involving other parties' property interests.
 9. To avoid new land use conflicts by prioritizing the re-use of currently or formerly operated County-owned property with detention facilities.
 10. To control the higher costs of new construction compared to the cost of renovation of existing facilities and the higher costs of maximum security construction compared to medium and low security detention facility construction by renovating and re-purposing existing facilities and infrastructure and/or designing separate low and medium security detention facilities where feasible.
 11. To maximize the use of state grant funds from AB 900 and any other grant funds, including the maximization of the number of female inmate beds covered per grant.
 12. To minimize the County's net cost to fund a female detention facility, including long-term operation and maintenance costs.

3.0 CALIFORNIA ENVIRONMENTAL QUALITY ACT FINDINGS

3.1 FINDINGS ON “NO IMPACT” AND “LESS THAN SIGNIFICANT IMPACTS”

Based on the environmental issue area assessment in the Final EIR, the County has determined that the Project will have no impact or a less than significant impact, including direct, indirect, and cumulative impacts, for the environmental issues summarized below. The rationale for the conclusion that no significant impact would occur in each of the issue areas is based on the environmental evaluations in the listed topical EIR sections in Section 4.0 of the Draft EIR, which include Existing Conditions, Impact Analysis, Cumulative Impacts, and Mitigation Measures.

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

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

3.1.1 Aesthetics

Finding. The proposed Project would have a less than significant direct, indirect, and cumulative impact based on some thresholds of significance for aesthetics, including the following: a scenic vista; scenic resources within a State scenic highway; and the existing visual character or quality of the site or its surroundings. Accordingly, no changes or alterations to the Project were required to avoid or substantially lessen any significant environmental effects under those thresholds. The Final EIR evaluated the following areas and found that no mitigation was required for the identified reasons:

- The Project site is not located on a hillside or ridgeline, nor is it part of a designated scenic vista in any local planning documents applicable to adjacent areas either in the City of Lancaster or in unincorporated County areas. The proposed Project would have a less than significant impact on a scenic vista. (Threshold 4.1a).
- There is no officially designated or eligible State scenic highway near the site, and the *City of Lancaster General Plan* does not establish any scenic corridors in the City. The proposed Project would have less than significant impacts on scenic resources within a State scenic highway. (Threshold 4.1b).
- All equipment staging areas would be kept on site and covered to prevent fugitive dust during construction, and the long-term operational visual changes would be designed to provide a more residential style open campus while providing necessary detention functionality, and the Project could be considered to be improvements to the existing site conditions. The proposed Project would have less than significant impacts and would not

substantially degrade the existing visual character or quality of the site and its surroundings. (Threshold 4.1c).

There is one Regulatory Requirement that would reduce the Project's potential aesthetic impacts, as listed below:

RR AES-1 Proposed off-site improvements within the public right-of-way will comply with applicable standards in the City of Lancaster's *Design Guidelines* as they relate to streetscape design for sidewalks and parkways.

3.1.2 Air Quality

Finding. The proposed Project would have no impact or a less than significant direct, indirect, and cumulative impact based on all thresholds of significance for air quality, including the following: applicable air quality plan; air quality standards or existing or projected air quality violation; criteria pollutants; sensitive receptors; and objectionable odors. Accordingly, no changes or alterations to the Project were required to avoid or substantially lessen any significant environmental effects under those thresholds. The Final EIR evaluated the following areas and found that no mitigation was required for the identified reasons:

- As stated in the Antelope Valley Air Quality Management District's (AVAQMD's) CEQA and Federal Conformity Guidelines, "A project is deemed to not exceed this threshold, and hence not be significant, if it is consistent with the existing land use plan". The proposed Project would remain consistent with the land use designation for the site, as contained in the Lancaster General Plan. The proposed Project would have no impact on the implementation of an applicable air quality plan (Threshold 4.2a).
- The proposed Project would not exceed thresholds for criteria pollutants established by the AVAQMD when measured by the maximum daily construction emissions. The estimated annual operational emissions due to Project-related operations would not exceed the AVAQMD CEQA significance thresholds. The proposed Project would have a less than significant impact on an existing or projected air quality violation from construction and operational emissions (Threshold 4.2b).
- Construction would result in less than significant temporary construction-related regional and localized air quality impacts. Due to distance between cumulative sites and the Project site and the requirement for all projects to implement dust-control measures, cumulative emissions of respirable particulate matter less than 10 micrometers in diameter (PM₁₀) would be less than significant. Maximum daily emissions of ozone (O₃) precursors, volatile organic compounds (VOC), and oxides of nitrogen (NO_x) would be substantially less than AVAQMD significance thresholds throughout the construction period. Because the Project conforms with the applicable air quality plans and does not have a direct air quality impact, the Project would not have a cumulative regional air quality impact. The proposed Project would have a less than significant impact on cumulatively considerable criteria pollutants (Threshold 4.2c).
- The proposed Project would not create a carbon monoxide (CO) hotspot, and there would be less than significant impacts related to exposure of sensitive receptors to diesel particulate matter (PM) (i.e., toxic air contaminants [TACs]). The Project site remain unoccupied during construction. Compliance with regulations and with worker training and dust-prevention protocols would ensure that impacts due to Valley Fever are less than significant. Any applicable future changes in Los Angeles County Department of Public Health policies that may be made regarding Valley Fever for inmate populations will be implemented as applicable throughout the LASD jail system. The proposed Project would

have a less than significant impact related to the exposure of sensitive receptors to substantial pollutant concentrations (Threshold 4.2d).

- Construction odors would be temporary and would dissipate rapidly from the source (i.e., the Project site) with an increase in distance. Therefore, the presence of potential odors would be short-term and would not affect a substantial number of people. The Project would not include any odor-generating land uses or generate objectionable odors. The proposed Project would have a less than significant impact on odors (Threshold 4.2e).

There are Project Design Features and Regulatory Requirements that would reduce the Project's potential air quality impacts, as listed below.

PDF AIR-1 The following administrative controls and hazard awareness actions will be included in the Contractor's Specifications:

1. Prior to Project construction initiation, and for any personnel additions after Project construction initiation, the County's contractor shall be informed of the following California Department of Public Health (CDPH) materials on Valley Fever, or any updated materials as applicable, will be distributed to worksite supervisors:
 - i. CDPH pamphlet entitled "Preventing Work-Related Coccidiomycosis (Valley Fever)" available at:
<http://www.cdph.ca.gov/programs/hesis/Documents/CocciFact.pdf> (CDPH 2013a).
2. Prior to Project construction initiation, and for any personnel additions after Project construction initiation, the County's contractor shall be informed of the following CDPH materials on Valley Fever, as well as any updated materials as applicable, will be distributed to construction workers:
 - i. CDPH pamphlet entitled "Valley Fever Fact Sheet" available at:
<http://www.cdph.ca.gov/HealthInfo/discond/Documents/VFGeneral.pdf> (CDPH 2013b).
 - ii. CDPH pamphlet entitled "Hoja de datos de la Fiebre del Valle (Valley Fever Fact Sheet in Spanish)" available at:
<http://www.cdph.ca.gov/HealthInfo/discond/Documents/HojaDeDatosDeLaFiebreDelValle.pdf> (CDPH 2013c).
 - iii. CDPH pamphlet entitled "Fact Sheet ng Valley Fever (Valley Fever Fact Sheet in Tagalog)," available at:
<http://www.cdph.ca.gov/HealthInfo/discond/Documents/TagalogGeneralValleyFeverFactSheet.pdf> (CDPH 2013d).

PDF AIR-2 The Contractor's Specifications will be required to comply with County's Specifications No. 7266, which require best management practices for construction activities. These Best Management Practices include:

- Eroded sediments and other pollutants must be retained on site and may not be transported from the site via sheetflow, swales, area drains, natural drainage courses or wind.
- Stockpiles of earth and other construction related materials must be protected from being transported from the site by the forces of wind or water.

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

PDF AIR-3 The Contractor's Specifications will require that on-site gardening features be constructed within raised beds only and will be filled with imported soils derived from outside the Antelope and Kern Valleys so that inmates would not be interacting directly with local soils.

RR AIR-1 All construction activities will be conducted in compliance with any applicable AVAQMD rules and regulations, including but not limited to the following:

- Rule 403, Fugitive Dust, for controlling fugitive dust and avoiding nuisance.
- Rule 402, Nuisance, which states that a Project shall not "discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property".
- Rule 1113, which limits the volatile organic compound content of architectural coatings.
- Rules 201, 203 and 219, which regulate permits for installation and use of equipment that may generate air contaminants, such of commercial kitchen equipment and emergency generators.

RR AIR-2 All construction activities will be conducted in compliance with 13 CCR §2485, which requires that all diesel-fueled commercial motor vehicles must not idle for more than 5 consecutive minutes at any location.

RR AIR-3 All construction activities will be conducted in compliance with 13 CCR §2485, which requires that all diesel-fueled commercial motor vehicles must not idle for more than 5 consecutive minutes at any location.

3.1.3 Biological Resources

Finding. The proposed Project would have no impacts or a less than significant direct, indirect, and cumulative impact based on some thresholds of significance for biological resources, including the following: candidate, sensitive, or special status species or local plans, policies, or regulations to protect biological resources; any riparian habitat or other sensitive natural community; any local policies or ordinances protecting biological resources; and adopted conservation plans. Accordingly, no changes or alterations to the Project were required to avoid or substantially lessen any significant environmental effects under those thresholds. The Final EIR evaluated the following areas and found that no mitigation was required for the identified reasons:

- Based on the findings of the reconnaissance surveys conducted at the Project site on November 21, 2013 and February 3, 2015, it was determined that due to the developed nature of the Project site, it does not provide suitable habitat for any of the special status plant or wildlife species known to occur in the region. The proposed Project would have no impacts on species identified as a candidate, sensitive, or special status (Threshold 4.3a).
- Based on the findings of the reconnaissance surveys conducted at the Project site on November 21, 2013 and February 3, 2015, it was determined that no riparian habitats or other special status vegetation types occur on or immediately adjacent to the Project site. The proposed Project would not have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations or by the California Department of Fish and Wildlife (CDFW) or U.S. Fish and Wildlife Service (USFWS). (Threshold 4.3b).
- The Project site is located 7.1 miles southwest of an existing Significant Ecological Area (SEA) and 4.2 miles from the proposed Antelope Valley SEA. The Project would not have any impact on these SEAs due to their distance from the site. The Los Angeles Code (Title 22, Chapter 22.56, Part 16) contains the Los Angeles County Oak Tree Ordinance; however, based on the findings of the reconnaissance surveys conducted at the Project site on November 21, 2013 and February 3, 2015, it was determined that there were no oak trees on the Project site. The proposed Project would not conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance. (Threshold 4.3e).
- The Project site is located within the boundaries of the California Desert Conservation Area (CDCA) Plan and the West Mojave Plan, which is an amendment to the CDCA Plan. The Project site is developed and does not support sensitive species proposed for conservation by the CDCA Plan or the West Mojave Plan. Therefore, no conflict with an adopted Habitat Conservation Plan or Natural Community Conservation Plan would occur with the Project. The proposed Project would have no impact related to conflict with a Habitat Conservation Plan or Natural Community Conservation Plan (Threshold 4.3f).

There are no Project Design Features applicable to biological resource impacts. Applicable regulations are incorporated into Mitigation Measures for the topic of Biological Resources.

3.1.4 Cultural Resources

Finding. The proposed Project would have a less than significant direct, indirect, and cumulative impact based on some thresholds of significance for cultural resources, including the following: historical resources and human remains. Accordingly, no changes or alterations to the Project were required to avoid or substantially lessen any significant environmental effects under those

thresholds. The Final EIR evaluated the following areas and found that no mitigation was required for the identified reasons

- The Polaris Flight Academy Historic District meets the criteria for listing in the National Register of Historic Places (NRHP) at a statewide level of significance under Criteria A and B and for listing in the California Register of Historic Resources (CRHR) under Criteria 1 and 2 for direct associations with military aviation during World War II and with the work of Major Corliss C. Moseley, respectively. However, the Project would not materially alter the physical characteristics that convey the significance of the historical resources. Because there would be no impacts to any contributing buildings in the Historic District and because the proposed redevelopment activities within the Historic District would have a less than significant indirect impact on the physical characteristics that convey the significance of the Historic District, impacts would be less than significant (Threshold 4.4a).
- Construction and operation of the proposed Project is not expected to disturb any human remains. The proposed Project would have a less than significant impact on human remains (Threshold 4.4d).

There are Project Design Features and Regulatory Requirements that would reduce the Project's potential cultural resources impacts, as listed below.

PDF CUL-1 The Project site boundaries, as defined, exclude the two hangars, which have been previously evaluated and appear eligible for listing in the National Register of Historic Places (NRHP). The Contractor's Specifications will require that none of the Polaris Flight Academy Historic District's contributing buildings or structures would be impacted by the Project.

RR CUL-1 All construction activities will be conducted in accordance with Section 7050.5 of the California Health and Safety Code regarding the potential discovery of human remains. If applicable, the Native American Heritage Commission (NAHC) will be responsible for designating the most likely descendant (MLD), as required by Section 5097.98 of the California Public Resources Code. If the landowner rejects the recommendations of the MLD, the burial location would be determined in compliance with California Public Resources Code Section 5097.98.

3.1.5 Geology and Soils

Finding. The proposed Project would have no impact or a less than significant direct, indirect, and cumulative impact based on all thresholds of significance for geology and soils, including the following: exposure of people or structures to potential substantial adverse effects; substantial soil erosion or the loss of topsoil; location on unstable geologic unit or soil; location on expansive soil; and soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems. Accordingly, no changes or alterations to the Project were required to avoid or substantially lessen any significant environmental effects under those thresholds. The Final EIR evaluated the following areas and found that no mitigation was required for the identified reasons

- The closest known fault with surface expression is the Mojave Segment of the San Andreas Fault, approximately 6.4 miles south of the Project site. Therefore, the Project would not be exposed to surface rupture hazards. The proposed Project would no impacts related to rupture of a known earthquake fault (Threshold 4.5a.i).
- The California Building Code (CBC) and County Building Code provide the appropriate building design criteria needed to protect the structural integrity of structures and

infrastructure against damage and collapse. Seismic design criteria and requirements in the CBC would allow structures and infrastructure to withstand seismic ground shaking and reduce hazards to persons and property. The Project would not expose people or structures to potential substantial adverse effects from ground shaking hazards. The proposed Project would have a less than significant impact related to strong seismic ground shaking (Threshold 4.5a.ii).

- The proposed Project's structural design, which must be completed in accordance with the recommendations of the geotechnical investigation and subject to the County Building Official would address liquefaction hazards to prevent damage to foundations, structures, and infrastructure. The proposed Project would have a less than significant on seismic related ground failure and liquefaction (Threshold 4.5a.iii).
- The proposed Project would retain the flat topography of the site; thus, the Project would not create or be exposed to landslide hazards. The proposed Project would have no impact related to landslides (Threshold 4.5a.iv).
- The proposed Project would be required to implement erosion-control measures to reduce wind and water erosion and to minimize sediments and loose soils from entering public roadways, storm drain systems, and adjacent areas. The proposed Project would not create new erosion hazards, nor would it increase existing hazards. The proposed Project would have a less than significant impact related to substantial soil erosion or the loss of topsoil (Threshold 4.5b).
- The County's building regulations provide building design criteria to protect the structural integrity of structures and infrastructure against geologic hazards. The CBC and County Building Code require the preparation of a geotechnical investigation to identify the geologic characteristics on specific locations where structures and infrastructure are proposed and to develop engineering and structural recommendations and measures prepared by registered professionals (i.e., California Registered Civil Engineer or Certified Engineering Geologist), including measures to reduce hazards from liquefaction, subsidence, and collapsible soils and other soil characteristics so as to maintain structural integrity of the Project. The proposed Project would have a less than significant impact related to location on a geologic unit or soil that is unstable (Threshold 4.5c).
- The Geohazard Study indicates that the upper five feet of soils on the site are not considered expansive. Thus, the proposed Project would not be exposed to soil expansion hazards. The proposed Project would have less than significant impacts related to location on expansive soil (Threshold 4.5d).
- The proposed Project would be served by the existing sewer lines that convey sewage and wastewater to County Sanitation District No. 14 facilities. Therefore, no septic tanks or alternative wastewater disposal systems are needed to serve the proposed Project. The proposed Project would have no impacts on the use of septic tanks or alternative wastewater disposal systems (Threshold 4.5e).

There is one Regulatory Requirement that would reduce the Project's potential geology and soils impacts, as listed below.

RR GEO-1 The Project will be designed and constructed in accordance with the Los Angeles County's Building Code, which adopts the California Building Code (CBC), which is based on the International Building Code (IBC). New construction, alteration, or rehabilitation shall comply with applicable ordinances set forth by the County and/or by the most recent County building and seismic codes in effect at the time of project design. In accordance with Section 1803.2 of the 2013 CBC, a

geotechnical investigation is required that must evaluate soil classification, slope stability, soil strength, position and adequacy of load-bearing soils, the effect of moisture variation on soil-bearing capacity, compressibility, liquefaction, and expansiveness, as necessary, determined by the County Building Official. The geotechnical investigation must be prepared by registered professionals (i.e., California Registered Civil Engineer or Certified Engineering Geologist). Recommendations of the report, as they pertain to structural design and construction recommendations for earthwork, grading, slopes, foundations, pavements, and other necessary geologic and seismic considerations, must be incorporated into the design and construction of the Project.

3.1.6 Greenhouse Gas Emissions

Finding. The proposed Project would have no impact or a less than significant direct, indirect, and cumulative impact based on all thresholds of significance for greenhouse gas (GHG) emissions, including the following: generation of GHG emissions and conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing emissions of GHGs. Accordingly, no changes or alterations to the Project were required to avoid or substantially lessen any significant environmental effects under those thresholds. The Final EIR evaluated the following areas and found that no mitigation was required for the identified reasons

- The proposed Project's total annual estimated GHG emissions are 5,645 metric tons of carbon dioxide equivalent per year (MTCO₂e/yr). This value is considerably less than the AVAQMD threshold of 90,718 MTCO₂e/yr. The proposed Project would have a less than significant impact related to the direct or indirect generation of GHG emissions (Threshold 4.6a).
- The proposed Project would include various measures to reduce GHG emissions, including offsets from adjacent County-owned solar facilities, buildings that achieve the equivalency of LEED certification, either through U.S. Green Building Council (USGBC) certification or through an equivalency be consistent, and video visitation and bicycle storage areas to reduce vehicle miles traveled. The Project would not conflict with regulations and policies adopted for the purpose of reducing GHG emissions. The proposed Project would have no impact related to conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs (Threshold 4.6b).

There are several Project Design Features and Regulatory Requirements that would reduce the Project's potential GHG emission impacts, as listed below.

PDF GHG-1 Up to 1 megawatt (MW) of the Project's electricity demands will be offset through the County's existing 2-megawatt (MW) solar energy facility located immediately east of the Project site. The Contractor's Specifications will require that this County-owned renewable energy source will off-set the Project's electrical demands throughout construction as well as long-term operations.

PDF GHG-2 The Contractor's Specifications will require that the Project will provide a combined minimum of 34 video-visiting stations on-site, along with video interview rooms in transitional housing buildings.

PDF GHG-3 The Project site will have the Antelope Valley Transit Authority (AVTA) bus and Metrolink schedules posted, as well as the locations of the nearest Park-and-Ride lots, in areas visible to visitors and in the Staff Services building to encourage the

use of public transportation by staff and visitors. AVTA bus and Metrolink schedule information will be updated to ensure accuracy.

- PDF GHG-4** The Contractor's Specifications will require that the Project will incorporate (1) a secure storage area for staff to store bicycles into the Project design plans that allow for the individual locking of bicycles and protection from sun and inclement weather, and (2) bicycle rack(s) adjacent to the Visitor Parking Lot that allows for the individual locking of bicycles.
- RR GHG-1** The Project will be designed and constructed in accordance with the Los Angeles County Code (Title 22, Section 22.52.2130), which requires all new buildings that are greater than 10,000 square feet (sf) and less than 25,000 sf in area will be designed and constructed to achieve the equivalency of a Leadership in Energy and Environmental Design (LEED™) certification; buildings of 25,000 sf or greater will achieve the equivalency of a LEED Silver certification. The Project will comply with Title 22 (Section 22.52.2200 et seq., Drought Tolerant Landscaping; and Section 22.52.2100, Green Building).
- RR GHG-2** The Project will be designed and constructed in accordance with the California Code of Regulations, Title 24 Building Energy Efficiency Program, which establishes a minimum level of building energy efficiency and requires energy efficient measures, including ventilation, insulation, and construction and the use of energy-saving appliances, conditioning systems, water heating, and lighting.
- RR GHG-3** The Project will be designed and constructed in accordance with the Los Angeles County Code (Title 31, including but not limited to, Section 301.2.1 Low-rise Residential Buildings, and Section 301.3.1, Nonresidential Buildings greater than or equal to 25,000 square feet.), Section 4.106.5, Landscape Design, and Section 5.106.3, Low Impact Development or the current County code requirements in place at the time of Project design and construction. Title 31 requires project designs and practices that will result in the conservation of water and energy resources, such as measures for building commissioning, clean vehicle parking, and solid waste recycling.
- RR GHG-4** The Project will include an Employee Commute Reduction Plan (ECRP), commonly known as the Rideshare Plan, in accordance with Los Angeles County Code Chapter 5.9, Vehicle Trip Reduction. The ECRP will specify the measures to be implemented at MLWDC to achieve the target average vehicle ridership performance goal for employee vehicles subject to the Ordinance.
- RR GHG-5** The Project will be subject to any project direction adopted by the board of Supervisors based upon the findings of the Advisory Board's evaluation of strategies to reduce negative impacts of operating the MLWDC away from the downtown Los Angeles area, including contract transportation for visitors, videoconferencing for attorney consultation, and reviewing national best practices for visiting and family reunification.

3.1.7 Hazards and Hazardous Materials

Finding. The proposed Project would have no impact or a less than significant direct, indirect, and cumulative impacts based on thresholds of significance for hazards and hazardous materials, including the following: the environment related to the routine transport, use, or disposal of hazardous materials; the release of hazardous emissions; the emission of hazardous emissions

or handle of hazardous or acutely hazardous materials, substances, or waste within ¼ mile of schools; safety hazards related to public airports; safety hazards for people within the vicinity of a private airstrip; emergency response or evacuation plans; or exposure of people or structures to wildfires. Accordingly, no changes or alterations to the Project were required to avoid or substantially lessen any significant environmental effects under those thresholds. The Final EIR evaluated the following areas and found that no mitigation was required for the identified reasons

- To prevent environmental hazards, a licensed hazardous waste hauler would have to transport and dispose of hazardous materials and wastes in compliance with applicable regulations. Contractors would need to comply with existing regulations, including those for proper waste hauling and transport, for proper hazardous waste management and accidental release protocol, for the proper monitoring and removal of any underground storage tanks, worker safety, and for erosion-control and sediment-control during construction. The proposed Project would have less than impacts related to the routine transport, use, disposal, or release of hazardous materials (Threshold 4.7a).
- There are no schools located within a ¼ mile of the Project site. The proposed Project would have no impact related to emission of hazardous emissions within an existing or proposed school (Threshold 4.7c).
- The nearest airport to the site is the General William J. Fox Airfield, which is located 2.3 miles north of the site. An Aviation Application will be submitted to the ALUC for the proposed communications tower to ensure that no hazards to flight operations at Fox Airfield are created by the communications tower. The Project site is located within the designated High Risk of Adverse Impact Zone (HRAIZ) of nearby military airports, as shown in the County General Plan. However, the Project would not produce electromagnetic and frequency spectrum interference. The proposed Project would have a less than significant impact related to hazards within an airport land use plan or public airport (Threshold 4.7e).
- There are private airstrips near the site. Bohunk's Airpark is located approximately 2.0 miles west of the site and Little Buttes Airfield is approximately 6.5 miles northwest of the site. The Project does not propose structures near the helipad located at the northeastern corner of the Project site. The heights of the existing dormitory housing and portables (which are located south of the helipad) and the kitchen would not be changed. The proposed radio communications tower would be located outside of the restricted approach zone, or the transitional zone of the on-site helipad. The proposed Project would have a less than significant impact related to hazards within a private airstrip (Threshold 4.7f).
- Construction activities at the site would not affect emergency response or evacuation of adjacent developments since activities would be confined to the site. The Project would not obstruct implementation of the City of Lancaster's Hazard Mitigation Plan (HMP) or the Emergency Operations Plan (EOP). Construction activities at the Project site would not obstruct evacuation procedures or implementation of the City's HMP. Roadways that provide access to the Project site and the surrounding areas would not be impacted during Project construction in a way that would physically impair or impede emergency response or evacuation in the City of Lancaster. The proposed Project would have a less than significant impact to emergency response plans or evacuation plans (Threshold 4.7g).
- The Project site is not located within a Very High Fire Hazard Severity Zone. The Project would be built in accordance with the County Building Code and County Fire Code and would not create fire hazards. Also, no on-site uses are proposed by the Project that may lead to brush fires in the surrounding areas. The proposed Project would have less than significant impacts related to risk of loss, injury, or death involving wildland fires (Threshold 4.7h).

There are several Regulatory Requirements that would reduce the Project's potential hazard and hazardous material impacts, as listed below.

RR HAZ-1 Any Project-related hazardous materials and hazardous wastes will be transported to and/or from the Project in compliance with any applicable State and federal requirements, including the U.S. Department of Transportation regulations listed in the Code of Federal Regulations (Title 49, Hazardous Materials Transportation Act); California Department of Transportation (Caltrans) standards; and the California Occupational Safety and Health Administration (CalOSHA) standards.

RR HAZ-2 Any Project-related hazardous waste generation, transportation, treatment, storage, and disposal will be conducted in compliance with the Subtitle C of the Resource Conservation and Recovery Act (RCRA) (Code of Federal Regulations, Title 40, Part 263), including the management of non-hazardous solid wastes and underground tanks storing petroleum and other hazardous substances. The Project will be designed and constructed in accordance with the regulations of the Los Angeles County Fire Department, which serves as the designated CUPA and which implements State and federal regulations for the following programs: (1) Hazardous Waste Generator Program, (2) Hazardous Materials Release Response Plans and Inventory Program, (3) CalARP, (4) AST Program, and (5) UST Program.

RR HAZ-3 Any Project-related underground storage tank (UST) repairs and/or removals will be conducted in accordance with the California Underground Storage Tank Regulations (Title 23, Chapter 16 of the California Code of Regulations). Any unauthorized release of hazardous materials will require release reporting, initial abatement, and corrective actions that will be completed with oversight from the RWQCB, DTSC, LACFD, SCAQMD and/or other regulatory agencies, as necessary. Any Project-related use of existing USTs will also have to be conducted (i.e., used, maintained and monitored) in accordance with the California Underground Storage Tank Regulations (Title 23, Chapter 16 of the California Code of Regulations).

RR HAZ-4 Any Project-related demolition activities that have the potential to expose construction workers and/or the public to asbestos-containing materials (ACMs) or lead-based paint (LBP) will be conducted in accordance with applicable regulations, including, but not limited to:

- Antelope Valley Air Quality Management District's (AVAQMD's) Rule 1403
- California Health and Safety Code (Section 39650 et seq.)
- California Code of Regulations (Title 8, Section 1529)
- California Occupational Safety and Health Administration (CalOSHA) regulations (California Code of Regulations, Title 8, Section 1529 [Asbestos] and Section 1532.1 [Lead])

RR HAZ-5 Any Project-related new construction, excavations, and/or new utility lines within 10 feet or crossing existing high pressure pipelines, natural gas/petroleum pipelines, electrical lines greater than 60,000 volts, will be designed and constructed in accordance with the California Code of Regulations (Title 8, Section 1541).

- RR HAZ-6** The Project will be designed and constructed in accordance with Part 77 of the Federal Aviation Regulations (FAR), which requires the County to notify the Federal Aviation Administration of proposed construction or alteration within 20,000 feet from the nearest point of the nearest runway of an airport where the structure would extend into a slope of a 100:1 and within 5,000 feet of a heliport where the structure would extend into a slope of a 25:1 from the nearest landing and take-off area of the heliport.
- RR HAZ-7** The radio communications tower shall be subject to review by the Los Angeles County Airport Land Use Commission for compliance with the General William J. Fox Airfield Land Use Compatibility Plan.

3.1.8 Hydrology and Water Quality

Finding. The proposed Project would have no impact or a less than significant direct, indirect, and cumulative impact based on all thresholds of significance for hydrology or water quality, including the following: water quality standards or waste discharge requirements; groundwater supplies or groundwater recharge; alteration of the existing drainage pattern of the site or area; increase of the rate or amount of surface runoff; substantial degradation of water quality; placement of housing or structures within a 100-year flood hazard area; exposure of people or structures to significant risk from flooding; and inundation by seiche, tsunami, or mudflow. Accordingly, no changes or alterations to the Project were required to avoid or substantially lessen any significant environmental effects under those thresholds. The Final EIR evaluated the following areas and found that no mitigation was required for the identified reasons:

- Compliance with the requirements of the National Pollutant Discharge Elimination System (NPDES) Construction General Permit would ensure that the Project does not violate water quality standards or substantially degrade water quality. The design-build contractor would have to finalize the proposed on-site drainage system based on final construction plans and would ensure that water pollutants generated at the Project site would be adequately treated. The on-site storm drainage system would comply with storm water quality and quality control requirements under the County's SUSMP, LID standards, Hydrology Manual, Best Management Practices Handbook, and Green Building Standards Code. The off-site driveways and water line extensions and connection would not generate pollutants that could enter the storm water. The proposed Project would have less than significant impacts related to the violation of water quality standards and substantial degradation of water quality (Threshold 4.8a and 4.8f).
- The Project site does not serve as a groundwater recharge area. The site is largely developed with existing buildings, pavement, and other site improvements. While an increase in impervious surfaces at the site would occur due to new buildings and pavements, the Project would include bioswales and an underground retention and infiltration structure that would collect and allow treated storm water to percolate into the ground. The proposed Project would have less than significant impacts to groundwater supplies or recharge and no impacts to underlying groundwater resources in the Antelope Valley (Threshold 4.8b).
- The use of bioswales and an underground infiltration retention structure would decrease storm water runoff rates that would be discharged at off-site locations. The County's Low Impact Development (LID) Ordinance requires that storm water runoff flow rates be retained at pre-development conditions to ensure that no hydromodification impacts occur at downstream areas. The proposed Project would have less than significant impacts related to the alteration of drainage patterns and potential for substantial erosion or siltation from construction, operations, or off-site improvements (Threshold 4.8c).

- The increase in the estimated impervious surfaces that would occur with the Project (an additional 7.63 acres of impervious area or approximately of 17 percent of the Project site) would be coupled with the infiltration that would occur with the bioswales and underground infiltration retention structure and the proposed three separate points of runoff discharge. Thus, an increase in runoff rates is not expected to require an upgrade of the off-site storm drain channel serving the site. Compliance with the County's LID Ordinance would retain storm water runoff flow rates at pre-development conditions. Thus, no exceedance of the capacity of existing drainage systems or off-site flooding would occur. The reduction in storm water pollutants exiting the site would prevent negative impacts to storm water quality at downstream storm drain facilities or drainages. The Project would also not create a need for larger storm drain lines and channels at off-site locations. The proposed driveway improvements would be at-grade and the water line extensions and connections would be placed underground. Also, they would not measurably increase impervious surfaces or runoff volumes or rates due to the limited areas of disturbance and paving. No flooding would occur and no new storm drain facilities would be needed by these off-site improvements. The proposed Project would have less than significant impacts related to the alteration of drainage patterns, the potential for flooding and pollutants in the runoff(Thresholds 4.8d and 4.8e).
- Neither the Project site nor the off-site improvement areas are located within the 100-year floodplain or the 500-year floodplain as mapped by the Federal Emergency Management Agency (FEMA). The Project would not be exposed to flood hazards. The proposed Project would have no impacts related to flooding or the redirection of flood flows within a 100-year flood hazard area (Thresholds 4.8g and 4.8h).
- A reservoir and dam are located approximately 11.5 miles west of the site and the potential inundation area consists largely of undeveloped land. It is also expected that waters from the dam and reservoir would dissipate at 110th Street West. Thus, inundation due to failure of the dam and reservoir is not expected to result in large amounts of water reaching the site. Also, the Project does not propose the construction of a dam or a large water body that may pose inundation hazards to the surrounding area. The proposed Project would have a less than significant impact related to the exposure of people or structures to a significant risk of loss, injury, or death involving flooding (Threshold 4.8i).
- Tsunami hazards are not present in the City of Lancaster or the Antelope Valley due to elevation and distance from the Pacific Ocean (i.e., over 45 miles). The site is located outside the tsunami inundation areas, as identified in the Los Angeles County Tsunami Inundation Maps prepared by the California Emergency Management Agency. The Project would not be exposed to tsunami hazards. The site is relatively flat and the nearest hillside area is located 4.75 miles southwest of the site, at Ritter Ridge. Mudflows from the adjacent hills and mountains would not affect the site due to distance and the presence of intervening structures. The proposed Project would have no impacts related to inundation by seiche, tsunami, or mudflow (Threshold 4.8j).

There are several Project Design Features and Regulatory Requirements that would reduce the Project's potential hydrology and water quality impacts, as listed below.

PDF HYD-1 The Contractor's Specifications will require that the Project will be designed and constructed in accordance with the following requirements of the Los Angeles County Department of Public Works for the incorporation of source-control, site-design, and treatment-control BMPs to reduce pollutants in the storm water and to reduce runoff rates and volumes to match existing conditions:

- 2002 Standard Urban Stormwater Mitigation Plan (SUSMP)

- 2006 Hydrology Manual
- 2009 County's Low Impact Development (LID) Standards Manual
- 2010 Green Building Standards Code (California Code of Regulations Title 24, Part 11)
- 2012 Best Management Practices Handbook

PDF HYD-2 The Contractor's Specifications will require that the Project will be designed and constructed in accordance with the County's Stormwater and Runoff Pollution Control Ordinance (Chapter 12.80 of the Los Angeles County Code), which prohibits illicit discharges; manages runoff into and from its Municipal Separate Storm Sewer Systems (MS4s); and requires BMPs for new development and major redevelopment projects.

RR HYD-1 The Project will be constructed in accordance with the National Pollutant Discharge Elimination System (NPDES) General Permit for Storm Water Discharges Associated with the Construction and Land Disturbance Activities, Order No 2009-0009-DWQ, NPDES No. CAS000002 (or the latest approved Construction General Permit). Compliance requires filing a Notice of Intent (NOI); a Risk Assessment; a Site Map; a Storm Water Pollution Prevention Plan (SWPPP) and associated Best Management Practices (BMPs); an annual fee; and a signed certification statement.

RR HYD-2 The Project will be constructed and operated in accordance with the National Pollutant Discharge Elimination System (NPDES) General Permit for Storm Water Discharges from Small Municipal Separate Storm Sewer Systems (MS4), Order No 2013-0001-DWQ, NPDES No. CAS000004 (or the latest approved MS4 General Permit). Compliance requires controls to reduce pollutants from the MS4 to the maximum extent practicable (MEP). The MEP standard requires Permittees to apply Best Management Practices (BMPs) that are effective in reducing or eliminating the discharge of pollutants to the waters of the U.S., and emphasizes pollutant reduction and source control BMPs to prevent pollutants from entering storm water runoff.

3.1.9 Land Use and Planning

Finding. The proposed Project would have no impact or a less than significant direct, indirect, and cumulative impact based on all thresholds of significance for land use and planning, including the following: physically dividing an established community; conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project; conflict with any applicable habitat conservation plan or natural community conservation plan. Accordingly, no changes or alterations to the Project were required to avoid or substantially lessen any significant environmental effects under those thresholds. The Final EIR evaluated the following areas and found that no mitigation was required for the identified reasons

- There are no residential uses on the Project site, and there are no established communities near the site that would be divided by the proposed Project. The proposed Project would have no impact related to physically dividing an established community (Threshold 4.9a).
- The Project site is located in the City of Lancaster, but the property is owned by the County and, thus, is not subject to the City of Lancaster's land use regulations. At the same time, the Project site is not specifically addressed by the County General Plan as it is located

within the Lancaster City limits. Therefore, there are no adopted land use plans that are applicable to the Project site. However, no conflict with Lancaster's General Plan 2030 would occur with implementation of the Project. No conflict with the Lancaster Zoning Ordinance would occur with implementation of the Project. The Project would not conflict with the guiding principles and relevant goals and policies in the County General Plan 2035. The Project would not conflict with the Antelope Valley Areawide General Plan; the Antelope Valley Area Plan (AVAP); SCAG's RCP, the RHNA, and the RTP/SCS, or Title 22, Planning and Zoning, of the County Code. The proposed Project would have no impact related to conflict with plans, policies, or regulations of an agency with jurisdiction over the project (Threshold 4.9b).

- The Project site is located within the boundaries of the *California Desert Conservation Area Plan* and the *West Mojave Plan*, which is an amendment to the *California Desert Conservation Area Plan*. The Project site is developed and does not support sensitive species proposed for conservation by these plans. No conflict with the *California Desert Conservation Area Plan* or the *West Mojave Plan* would occur with the Project. The proposed Project would have no impact related to conflict with any applicable habitat conservation plan or natural community conservation plan (Threshold 4.9c).

3.1.10 Noise

Finding. The proposed Project would have no impact or a less than significant direct, indirect, and cumulative impact based on some thresholds of significance for noise, including the following: excessive groundborne vibration or groundborne noise levels; permanent increases in ambient noise levels; or exposure of people to excessive noise levels associated with airports or private airstrips. Accordingly, no changes or alterations to the Project were required to avoid or substantially lessen any significant environmental effects under those thresholds. The Final EIR evaluated the following areas and found that no mitigation was required for the identified reasons:

- Exterior noise levels would be less than 57 A-weighted decibels (dBA) Community Noise Level Equivalent (CNEL). Interior noise levels would not exceed 45 dBA CNEL. Future traffic noise levels at on-site sensitive receptors would be within the "Normally Acceptable" range in the County standards. It is estimated that visitor trips would generate an additional 474 ADT on weekend days and that all of these trips would access the Project site from 60th Street West. It is also conservatively assumed that some residences on 60th Street West would be exposed to all Project-generated traffic using 60th Street West, or 1,258 ADT. When added to existing traffic volumes, the noise level would increase by less than 1 dBA, which would not be perceptible by most persons. Noise from driveway access, loading and unloading, trash disposal, and landscape maintenance would occur intermittently and would not be anticipated to exceed the noise ordinance limits, which allow noise events to exceed the continuous noise limits when noise events occur for less than 30 minutes in an hour. The public address (PA) system would not be used for routine communications within the MLWDC. Noise impacts from on-site sources from long-term operations and related to a substantial permanent increase in ambient noise levels would be less than significant; no mitigation is required (Threshold 4.10a and Threshold 4.10c).
- The Project site would be unoccupied during construction. There would be no potential for human annoyance due to vibration. The highest potential vibration level at 10 feet during grading activities would be less than the structural damage guidelines for "Historic and some old buildings". With respect to structural integrity and resistance to damage from vibration, the existing on-site buildings adjacent to Project's construction activities (e.g., hangars) are as substantial or more substantial than buildings in the "Historic and some old buildings" classification as they are largely constructed of concrete block. Therefore, it is concluded that there would be no potential for structural damage to existing structures

on the Project site. There would be no operational activities with the potential to cause vibration impacts. The proposed Project would have no impacts related to exposure to persons to or generation of excessive groundborne vibration or groundborne noise levels (Threshold 4.10b).

- Because the 65 dBA CNEL noise contour for Fox Airfield would be more than 2 miles from the Project site, staff, inmates, and visitors would not be exposed to excessive noise levels. The nearest private airstrip to the Project site is Bohunk's Airpark, which is located approximately two miles west of the site. There are no published noise contours for Bohunk's Airpark; however, considering the distance from the Project site and the low number of based aircraft, it is concluded that staff, inmates, and visitors would not be exposed to excessive noise levels. The proposed Project would have less than significant impacts on persons residing or working within an two miles of a public airport or public use airport (Thresholds 4.10e).
- The existing helipad landing area at the northeast corner of the MLDC is approximately 175 feet from Barracks E. It is assumed that normal helicopter operations at the helipad would occur during daylight hours and would not cause any sleep disturbance. While approaches and departures would be heard by staff, inmates, and visitors at the facility, the daytime occurrence of occasional helicopter operations would not be considered excessive noise exposure. The proposed Project would have less than significant impacts on persons residing or working in the vicinity of a private airstrip (Thresholds 4.10f).

There are Project Design Features and Regulatory Requirements that would reduce the Project's potential noise impacts, as listed below.

PDF NOI-1 The Contractor's Specifications will require that the Project will use construction vehicles and equipment, either fixed or mobile, that will be equipped with properly operating and maintained mufflers (equivalent or better than original factory equipment), which will be periodically inspected to ensure compliance. Equipment maintenance and staging areas will be located at least 450 feet from residences on 60th Street West.

RR NOI-1 The Project will be constructed in accordance with Section 12.08.440 of the County Code, which prohibits construction activities that generate noise that could create a disturbance across a residential or commercial property line from occurring between 7:00 PM and 7:00 AM on weekdays, or at any time on Sunday or a federal holiday.

3.1.11 Population and Housing

Finding. The proposed Project would have no impact or a less than significant direct, indirect, and cumulative impact based on all thresholds of significance for population and housing, including the following: substantial population growth; displacement of substantial numbers of existing housing; and displacement of substantial numbers of people. Accordingly, no changes or alterations to the Project were required to avoid or substantially lessen any significant environmental effects under those thresholds. The Final EIR evaluated the following areas and found that no mitigation was required for the identified reasons:

- Construction activities are not expected to induce population growth in the area, nor would construction activities permanently change population, housing, or employment in the City. Potential increases in population that may indirectly accompany the Project can be served by available housing units or future housing development that has been accounted by the

City in its General Plan and, thus, would not be considered substantial housing growth over the City's 2015 housing stock of 52,636 dwelling units. The number of jobs available in the City of Lancaster would increase by 523 positions from the 48,814 jobs in 2012, as reported by the Southern California Association of Governments (SCAG) in 2013, to 49,337 jobs. The increase would be within SCAG projections of 51,900 jobs by 2020 and 54,200 jobs by 2035. Thus, there would be no exceedance of SCAG's population projections for the City for 2020 and 2035, and no substantial employment growth would occur with the Project. The proposed Project would have a less than significant impact related to inducing substantial population growth directly or indirectly in an area (Threshold 4.11a).

- There are no dwelling units, residents, households, or inmates at the Project site, and no housing or household displacement would occur with the Project. The proposed Project would have no impacts related to housing displacement (Threshold 4.11b).
- The proposed Project would not displace residents or inmates at the MLDC since the facility has not operated as a detention center since 2012 and no longer houses inmates. The Project would not result in the displacement of existing employees, as previously discussed, because former ICE employees at the MLDC and current Sheriff's Department employees would have an opportunity to become employed at MLWDC. The proposed Project would have no impacts related to displacing people (Threshold 4.11c).

There are no Project Design Features or Regulatory Requirements that would reduce the Project's potential population and housing impacts.

3.1.12 Public Services and Recreation

Finding. The proposed Project would have a less than significant direct, indirect, and cumulative impact based on all thresholds of significance for public services and recreation, including the following: performance objectives for public services; existing neighborhood and regional parks or other recreation facilities; and the construction or expansion of recreational facilities. Accordingly, no changes or alterations to the Project were required to avoid or substantially lessen any significant environmental effects under those thresholds. The Final EIR evaluated the following areas and found that no mitigation was required for the identified reasons

- Short-term impacts due to the presence of construction workers would not require additional fire protection services or other medical facilities. The Project would include security and safety provisions for detention facilities and would protect the public by safely keeping the inmates. These standards require that each facility have a plan for fire suppression that is developed with the local fire department and/or the State Fire Marshal. Long-term operation of the Project would not result in significant demands for Los Angeles County Fire Department (LACFD) services and facilities in the Antelope Valley. Project implementation would not create a public health or safety hazard that would generate a high demand for emergency or non-emergency medical services. Emergency medical services would be provided by LACFD paramedics and local hospitals, such as Antelope Valley Hospital and Palmdale Regional Medical Center. Other non-emergency medical needs of the inmates would be handled by the staff at the on-site Medical Building or at a local contract provider facility. Female inmates requiring a higher level of medical or mental health care would not be housed at the Project. Project implementation would not create a public health or safety hazard that would generate a high demand for emergency or non-emergency medical services.

Long-term operation of the proposed Project would not result in significant demands for police protection and law enforcement services and facilities of the County Sheriff's

Department in the Antelope Valley. The facility's policy and procedures manual should also outline emergency procedures that include and/or address: (1) fire suppression pre-plan; (2) escape, disturbances, and the taking of hostages; (3) civil disturbance; (4) natural disasters; (5) periodic testing of emergency equipment; and (6) storage, issue, and use of weapons, ammunition, chemical agents, and related security devices. Indirect impacts related to population growth due to the provision of new employment opportunities and relocating visitors/families would not result in substantial housing or population growth. The proposed Project would result in less than significant substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities the construction of which would cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for fire protection services, police protection services, schools, parks, and/or other public facilities (Threshold 4.12a).

- It is anticipated that the local population could provide adequate skilled workers to satisfy the construction-related positions and there would be no need to relocate workers from other areas. Therefore, the presence of construction workers would not directly or indirectly result in new demands for additional parks or recreational facilities because the construction workers are not likely to relocate to areas near the site due to temporary employment. Project inmates would not increase in the use or demand for recreational facilities in the City of Lancaster or the surrounding area, as the inmates would not be allowed off site. The Project does not include residential land uses, and would not therefore directly generate population growth that would result in additional demand for parks or recreational facilities in the Project area. The proposed Project would have less than significant impacts related to the use of existing neighborhood and regional parks or other recreational facilities (Threshold 4.12b).
- The proposed Project would provide recreational facilities on the Project site for the exclusive use by inmates. These would include a recreational building for indoor recreation (e.g., game tables and a craft room) and outdoor recreation yards with a sports field, game courts, patios, outdoor seating, walkways, and gardens. Impacts related to the creation of an adverse physical change on the environment due to the construction or expansion of recreational facilities would be less than significant (Threshold 4.12c).

There are several Project Design Features and Regulatory Requirements that would reduce the Project's potential public services and recreation impacts, as listed below.

PDF PS-1 The Contractor's Specifications will require that the Project will include space to accommodate both indoor and outdoor recreational facilities for inmate use only, including a recreational building for indoor recreation (e.g., game tables and a craft room); a full sized sports court for volleyball and basketball; a soccer field; a running track; and gardening areas, for both vegetable and flower cultivation.

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

PDF PS-3 The Contractor's Specifications will require that the Project will include space to accommodate a Medical Building and Inmate Processing Area that will provide medical screening; mental health screening; a pharmacy; dental care services; radiology; laboratory services; obstetrics and gynecological services; orthopedic

and dermatology services; wellness, hygiene, and diseases prevention training; preventative medical care; sick call services; emergent care; annual medical and dental exams; and tele-medicine/tele-psychiatry services.

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

RR PS-2 The Project will be designed, constructed and operated in accordance with pertinent provisions of Title 15 of the California Code of Regulations (Crime Prevention and Corrections) and other applicable State and federal requirements. Title 15 (specifically Division 1, Chapter 1, Subchapter 4) outlines the minimum standards for local detention facilities, court holding facilities, temporary holding facilities, and law enforcement facilities, including lockups (a locked room or secure enclosure under the control of a peace officer or custodial officer and primarily used for temporary confinement).

3.1.13 Transportation/Traffic

Finding. The proposed Project would have no impacts or a less than significant direct, indirect, and cumulative impact based on all thresholds of significance for transportation and traffic, including the following: conflict with an applicable plan, ordinance, or policy establishing measure of effectiveness for the performance of the circulation system; conflict with an applicable congestion management program; change in air traffic patterns; substantial increases in hazards; inadequate emergency access; and conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities. Accordingly, no changes or alterations to the Project were required to avoid or substantially lessen any significant environmental effects under those thresholds. The Final EIR evaluated the following areas and found that no mitigation was required for the identified reasons

- Approximately 10 new weekday AM peak hour PCE vehicle trips (5 inbound and 5 outbound) and 49 new weekday PM peak hour PCE vehicle trips (5 inbound and 44 outbound) would occur during Project construction. Project operations would generate 160 new weekday AM peak hour vehicle trips (86 inbound and 74 outbound) and 80 new weekday PM peak hour vehicle trips (8 inbound and 72 outbound) (see Table 4.13-4 below). If the intensity of construction activity is increased (i.e., doubled), higher weekday PM peak hour trip generation could occur (e.g., 10 inbound vehicle trips and 88 outbound trips). This increase in construction traffic is not anticipated to exceed the significance thresholds established by the City of Lancaster, as the increases in the v/c ratios are less than 0.02 and the Levels of Service (LOS) are not at LOS E or F.

The long-term operation of the proposed Project, which would generate 160 new weekday morning (AM) peak hour trips, 80 new weekday evening (PM) peak hour trips, 1,038 vehicle trips during a weekday 24-hour period, and 426 new weekend midday peak hour trips, would be less than significant. With the addition of Project-generated traffic, volume to capacity ratios would still operate at Level of Service (LOS) D or better. Vehicle queuing onto the State Route (SR) 14 mainline travel lanes is not expected with the Project and impacts on California Department of Transportation (Caltrans) facilities would be less than significant. Since the forecasted traffic generation during peak construction activities would be less than the trip generation during Project operations, the traffic impacts associated with construction activities are also determined to be less than significant. The

proposed Project is consistent with the goals of SCAG's Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). Federal Transportation Improvement Program (FTIP) projects in the City of Lancaster and in the Antelope Valley would not be affected by the proposed Project. The proposed Project would have less than significant impacts related to applicable plans, ordinances, and policies establishing measures of effectiveness for the performance of the circulation system (Threshold 4.13a).

- SR-14 is on the CMP highway system and the nearest freeway monitoring location is located at SR-14, south of Junction Route 48. The Project will not add 150 or more trips (in either direction), during the weekday AM or PM peak hours to this CMP freeway monitoring location. The Project will not add 50 or more trips (in either direction) during the weekday AM or PM peak hours to this CMP intersection monitoring location. No more than six vehicle trips during the AM peak hour and no more than three trips during the PM peak hour would use this CMP intersection. Therefore, no conflict with the CMP will occur with the Project. The proposed Project would have less than significant impacts related to applicable congestion management programs (Threshold 4.13b).
- The Project would not be directly served by air transportation and would not affect air traffic volumes at the William J. Fox Airport, the nearest airport to the Project site. Also, due to the distance of the site to this airport (approximately 2.3 miles to the north), no impacts to aircraft operations at the William J. Fox Airport would occur with the proposed Project. The on-site helipad is used every day by Sheriff's Department helicopters for crew relief, and the Project would not change the frequency of landings and take-offs from this helipad. Also, the Project would not create hazards or adversely affect helipad operations. The proposed Project would have no impacts on air traffic patterns or operations (Threshold 4.13c).
- No changes to the alignment of the off-site roads and existing driveways serving the site are proposed by the Project. No new roads, sharp curves, or dangerous intersections would be created near the site. Also, no roads are proposed to be vacated. The proposed Project would have less than significant impacts related to traffic hazards and temporary construction activities (Threshold 4.13d).
- The Project site is served by a developed roadway network (including West Avenue I and 60th Street West) that provides emergency access and evacuation routes to the site and existing developments on and near the site. No changes to roadways are proposed by the Project, and the Project would be developed in accordance with current regulations, including emergency access for fire protection personnel. Compliance with the California Fire Code would ensure the availability of adequate emergency access to the structures proposed on site. The proposed Project would have less than significant impacts on traffic flows for emergency response and access or for evacuation (Threshold 4.13e).
- It is anticipated that the existing transit services in the area and the region will adequately accommodate the increase of Project-generated transit trips. No new or expanded transit services are needed to serve the Project. Roadway shoulders and sidewalks in the area may be used by bicyclists and pedestrians coming to or going from the Project site. The increase in bicyclists and pedestrians that may be generated by the Project is not expected to be substantial. The proposed Project would have less than significant impacts related to alternative transportation systems (Threshold 4.13f).

There are Project Design Features and Regulatory Requirements that would reduce the Project's potential transportation and traffic impacts, as listed below.

PDF TRA-1 The Contractor's Specifications will require that the vehicular access to the Project will be via two existing driveways: one at 60th Street West south of West Avenue I and one at West Avenue I. The site access driveways will be stop-sign controlled with a stop-sign facing the minor street approach (i.e., at the Project driveway). The Project driveways will have one inbound travel lane and one outbound travel lane. As determined by the County of Los Angeles Department of Public Works improvements to driveways to accommodate ingress/egress, including new curb and gutter improvements, may be required.

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

RR TRA-2 The Project's construction activities on public rights-of-way will be conducted in accordance with the current Standard Specifications for Public Works Construction (Greenbook) and Additions and Amendments to the Standard Specifications for Public Works Construction (Graybook), including Traffic Control Provisions.

RR TRA-3 For any off-site traffic or parking-related activities within the City of Lancaster, the Project's construction activities will be conducted in accordance with the City of Lancaster's Traffic Code (Title 10 of the Lancaster Municipal Code), related to vehicle parking on public roads; construction traffic signs and traffic control; and other related regulations.

3.1.14 Utilities and Service Systems

Finding. The proposed Project would have a less than significant direct, indirect, and cumulative impact based on some thresholds of significance for utilities and services systems, including the following: exceeding wastewater treatment requirements; construction or expansion of existing facilities; inadequate capacity by the wastewater treatment provider; insufficient permitted landfill capacity; and noncompliance with solid waste statutes and regulations. Accordingly, no changes or alterations to the Project were required to avoid or substantially lessen any significant environmental effects under those thresholds. The Final EIR evaluated the following areas and found that no mitigation was required for the identified reasons:

- The Project would not generate industrial wastewater (i.e., wastewater from manufacturing, processing, institutional, commercial, or agricultural operation or any operation where the wastewater discharged includes significant quantities of waste of non-human origin); however, it would still have to comply with the County of Los Angeles Sanitation District's (LACSD's) Wastewater Ordinance. The proposed Project would have less than significant impacts related to wastewater treatment requirements of the applicable Regional Water Quality Control Board (Threshold 4.14a).
- Design and installation of the on-site water lines would be in accordance with applicable regulatory requirements, including the Los Angeles County Code, which incorporates by reference the California Building Code, the California Electrical Code, the California Mechanical Code, the California Plumbing Code, and the California Fire Code, subject to specific amendments. The use of water supplies from LACWWD No. 40 (LACWWD 40) would not require other new facilities that may have impacts. The proposed off-site water

line extension and connection to the LACWWD 40 line on West Avenue I would facilitate water service to the Project but would not require new water facilities. No upgrades to off-site storm drainage lines and facilities serving the site would be needed. There is remaining capacity in the West Avenue I trunk sewer and at the Lancaster Water Reclamation Plant to serve the Project, and no new or expanded treatment capacity is required. The proposed Project would have a less than significant impact related to new water or wastewater treatment facilities or expansion of existing facilities (Threshold 4.14b).

- The Project includes improvements to the on-site storm drain system that will include new storm drain lines, catch basins with filter inserts, bioswales, and an underground retention and infiltration structure to remove pollutants from the storm water and prevent an increase in runoff volumes and rates. The on-site storm drainage system would be designed for a 25-year recurrence period storm and in accordance with the Los Angeles County hydrology manual and LID standards. The proposed Project would have less than significant impacts related to construction of new storm water drainage facilities or expansion of existing facilities (Threshold 4.14c).
- The Avenue "I" West trunk sewer has a design capacity of 53.9 mgd, with a 2011 conveyed flow of 7.4 mgd, leaving excess capacity of 46.5 mgd. The Project's wastewater will be treated at the Lancaster Water Reclamation Plant, which has a design capacity of 18 mgd and currently processes an average flow of 13.4 mgd. There is 46.5 mgd of available capacity at the trunk sewer and 4.6 mgd of available capacity at the treatment plant. Anticipated Project wastewater generation is within the capacity of the Avenue "I" West trunk sewer and the Lancaster Water Reclamation Plant. Impacts to capacity of the wastewater treatment provider would be less than significant because no new or expanded treatment capacity is required (Threshold 4.14e).
- The Project's estimated construction waste volume would represent approximately 0.13 percent of the remaining capacity of the Lancaster Landfill and the Antelope Valley Landfill and are within each landfill's daily capacity limit of 3,564 tons and 5,100 tons, respectively. standards. The combined estimated remaining capacities of the Lancaster Landfill and the Antelope Valley Landfill is approximately 48.1 million cubic yards. With no consideration of the effects of on-site recycling and waste reduction, the Project's long-term daily solid waste generation (i.e. estimated at 1,384 tons per year) would represent less than 0.001 percent of the Lancaster Landfill's available daily tonnage of 5,100 tons of solid wastes per day and 0.0011 percent of the Antelope Valley Landfill's available daily tonnage of 3,564 tons of solid wastes per day. The proposed Project would have a less than significant impact related to landfill capacity from the short-term construction solid waste disposal needs of the Project (Threshold 4.14f).
- Construction of the proposed Project would comply with all applicable construction waste regulations, including the County's Green Building Standards Code and Construction and Demolition Debris Recycling and Reuse Ordinance to reduce construction waste volumes by at least 65 percent. The proposed Project would implement recycling programs in compliance with County policies, which have been adopted to comply with solid waste regulations such as the California Integrated Waste Management Act (AB 939) and the County's Source Reduction and Recycling Element (SRRE) and Household Hazardous Waste Element (HHWE) under its Integrated Waste Management Plan (IWMP). Hazardous wastes would also be disposed of in accordance with existing regulations. The proposed Project would have less than significant impacts on federal, state, and local statutes and regulations related to solid waste regulations (Thresholds 4.14g).

- Electrical service to the Project would be provided by SCE through connections to existing electrical lines on West Avenue I and 60th Street West. The Project's anticipated electrical power demand would represent less than 0.01 percent of SCE's power supply in 2012 and would not, therefore, create a significant effect on either peak or base load energy demands from SCE such that new or expanded off-site electrical infrastructure is necessary to serve the Project. The Project's natural gas demand would represent less than 0.01 percent of SCG's storage capacity for its natural gas supplies and would not, therefore, create a significant effect on either peak or base load energy demand. SCE and SCG have indicated that implementation of the Project would require no off-site additions or expansions of electrical or natural gas infrastructure. Verizon indicated that it appears to have enough capacity to serve the Project. There would be less than significant impacts related to the construction of infrastructure or expansion of facilities (Threshold 4.14h).

There are several Project Design Features and Regulatory Requirements that would reduce the Project's potential utilities and service system impacts, as listed below.

PDF UTL-1 The Contractor's Specifications will require that the Project will include the following on-site utility infrastructure improvements:

- New on-site fire and domestic/potable water pipelines that connect to all existing and new buildings, and includes new fire hydrants, as required by the County of Los Angeles Fire Department and/or Department of Public Works.
- New connections of the existing on-site sewage pipelines to ensure connection to new on-site buildings.
- New on-site storm drainage pipelines and facilities that connect with existing storm drain infrastructure that complies with storm water quality and quality control requirements under the County's SUSMP, LID standards, and Green Building Standards Code.

PDF UTL-2 The Contractor's Specifications will require that the Project will include a new off-site 12-inch water pipeline extension from the on-site water lines to the existing water main within West Avenue I. The extension will connect from either 60th Avenue West or from the northern boundary of the site near the helipad, to the existing 12-inch LACWWD 40-owned distribution pipeline in West Avenue I. Existing connections to existing groundwater wells and reservoirs located adjacent to 60th Street West will be severed. The Project's disconnection from the existing water distribution system will be conducted in such a manner as to ensure the integrity of the existing wells, pumps, reservoirs, and water lines for continued use by other County-owned facilities currently being served by this water system.

RR UTL-1 The Project will be designed, constructed and operated in accordance with the County of Los Angeles Sanitation District's (LACSD's) Wastewater Ordinance, all wastewater discharges into LACSD facilities shall be required to comply with the discharge standards set forth to protect the public sewage system.

RR UTL-2 The Project's water, sewer, storm drain, and other utility infrastructure improvements will be designed, constructed and operated in accordance with the applicable regulations set forth in the Los Angeles County Code, which incorporates by reference the California Building Code, the California Electrical Code, the California Mechanical Code, the California Plumbing Code, the California Fire Code, and the Green Building Standards Code.

RR UTL-3 The Project will be constructed in accordance with the County's Green Building Standards Code and Construction and Demolition Debris Recycling and Reuse Ordinance, which requires a minimum of 65 percent of the "non hazardous construction and demolition debris" (by weight or volume) to be recycled or reused unless a lower percentage is approved by the Director of Public Works.

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

3.1.15 Energy

Finding. The proposed Project would have a less than significant direct, indirect, and cumulative impact based on all thresholds of significance for energy, including the following: substantial demand for energy that requires expanded supplies or the construction of new infrastructure or expansion of existing facilities and inefficient, wasteful and unnecessary consumption of energy. Accordingly, no changes or alterations to the Project were required to avoid or substantially lessen any significant environmental effects under those thresholds. The Final EIR evaluated the following areas and found that no mitigation was required for the identified reasons:

- The Project's power demand would be offset by up to one megawatt (MW) of electricity generated by the County's adjacent solar energy facility. This renewable energy source will be available to the Project site throughout construction and long-term operations. Because the Project involves the redevelopment of an existing facility, rather than the construction of a new facility, it is reusing and recycling existing structures and materials, which would reduce the amount of energy required during facility construction. Impacts related to energy use during construction would be temporary and would not require expanded energy supplies or the construction of new infrastructure. The Project would not result in a substantial demand for energy that would require expanded supplies or the construction of other infrastructure or expansion of existing facilities. The Project would include a substantial increase in the opportunities for video visitation when compared to CRDF, which would reduce vehicle trips. The proposed Project also includes an Employee Commute Reduction Plan (ECRP), commonly known as the Rideshare Plan, to reduce vehicle trips. The proposed Project would have less than significant impacts related to substantial demand for energy that requires expanded supplies or the construction of other infrastructure or expansion of existing facilities (Threshold 4.15a).
- The regulations, plans, and policies adopted for the purpose of maximizing energy efficiency that are directly applicable to the Project include (1) Countywide Energy and Environmental Policy to achieve the equivalency of a Leadership in Energy and Environmental Design (LEED™) certification for buildings that are 10,000 square feet (sf) or larger (RR GHG-1); (2) California's Title 24 Energy Efficiency Standards for Residential and Nonresidential Buildings (RR GHG-2); (3) Title 24 California Green Building Standards Code (CALGreen Code); and Title 31 of the County Code (the Los Angeles County Green Building Standards Code) (RR GHG-3). The Project would be consistent with the requirements of these energy-related regulations. The proposed Project would have less than significant impacts related to inefficiency, wastefulness, and unnecessary consumption of energy as a result of the Project (Threshold 4.15b).

There are no Project Design Features or Regulatory Requirements that would reduce the Project's potential energy impacts.

3.2 ISSUES DEEMED NO IMPACT OR LESS THAN SIGNIFICANT IMPACT IN THE INITIAL STUDY/NOTICE OF PREPARATION

In accordance with Section 15063 of the Guidelines, the County of Los Angeles prepared an Initial Study/Environmental Checklist for the proposed Project and distributed it along with the Notice of Preparation (NOP) for the Mira Loma Women's Detention Center Project EIR to responsible and interested agencies and interest groups. In preparing the Initial Study/Notice of Preparation (IS/NOP), the County determined the following issues not to be significant; and, in accordance with Section 15128 of the Guidelines, they did not receive further evaluation in the EIR:

- **Agriculture and Forestry Resources.** The Project site does not currently support any agricultural uses or activities. It is currently developed with several buildings, parking lots, and disturbed/developed areas. Based on a review of the current (2010) Los Angeles County Important Farmland Map produced by the California Department of Conservation's Farmland Mapping and Monitoring Program (FMMP), there is no land designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance within or near the Project site. The Project site is designated as "Urban and Built Up Land". Lands surrounding the site are designated as "Other Land". No part of the Project site or adjacent areas is zoned forest land, timberland, or timberland zoned for Timberland Production, nor would the Project result in the loss of forest land or conversion to non-forest use (Thresholds II.a through II.e).
- **Mineral Resources.** Implementation of the Project would not result in the loss of availability of known mineral resources that would be of value to the region or the residents of the State and would not result in the loss of availability of locally important mineral resources (Thresholds XI.a and XI.b).

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

The County finds that the following environmental impacts can and will be mitigated to below a level of significance based upon the implementation of the mitigation measures in the Final EIR. These findings are based on the discussion of impacts in the detailed issue area analyses and cumulative impacts in Section 4.0 of the Draft EIR. An explanation of the rationale for each finding is presented below.

3.3.1 Aesthetics

Impact: New Sources of Lighting

As discussed under Threshold 4.1d, although the County has adopted rural outdoor lighting standards (Chapter 22.44, Part 9 of the County Code) that are intended to reduce light pollution and preserve the night-time environment, public facilities that are used for incarceration are exempt from the regulations if the lighting is needed for security and operation of the facility. Neither the County of Los Angeles nor the City of Lancaster has regulations limiting the maximum amount of lighting that can trespass onto a residential property. In order to ensure that lighting levels do not significantly impact nearby residential properties, mitigation is required. MM AES-1 will mitigate the potentially significant impact to a less than significant level.

Finding

The County finds that changes or alterations have been incorporated into the Project that mitigate potentially significant direct, indirect, and cumulative impacts on the environment, as identified in

the Final EIR. Specifically, the following mitigation measure is feasible and is adopted to mitigate potentially significant effects from lighting to a less than significant level:

MM AES-1 A Lighting Plan shall be prepared that depicts the locations of lighting fixtures, types of fixtures, mounting heights, and aiming directions to be installed on the Project site. The Lighting Plan shall ensure that sensitive receptors on adjacent properties would not be significantly adversely affected by light spillover, while also ensuring that lighting levels meet the security requirements for the MLWDC. The Lighting Plan shall be provided to the Los Angeles County Director of Public Works (DPW) to confirm its findings prior to the commencement of any on-site or off-site demolition/construction activities. Upon approval of the Lighting Plan by DPW, the Project shall be implemented in compliance with the Plan.

Rationale for Finding

Impacts related to the potential for substantial light trespass that could adversely affect day or night-time views in the area would be less than significant with implementation of MM AES-1. The Lighting Plan would require depicting the locations of lighting fixtures, types of fixtures, mounting heights, and aiming directions to be installed on the Project site. The Lighting Plan shall ensure that sensitive receptors on adjacent properties would not be significantly adversely affected by light spillover, while also ensuring that lighting levels meet the security requirements for the MLWDC. The Lighting Plan shall be provided to the Los Angeles County Director of Public Works (DPW) to confirm its findings prior to the commencement of any on-site or off-site demolition/construction activities. Implementation of MM AES-1 would ensure that impacts related to the potential for substantial light that could adversely affect day or night-time views in the area would be less than significant after mitigation.

Reference

Draft EIR Section 4.1, Aesthetics

3.3.2 Biological Resources

Impact: Native Wildlife Nursery Sites

As discussed under Threshold 4.3d, bat maternity roosts (where bats give birth and nurse their young) of any species may be considered native wildlife nursery sites. The Project's short-term construction impacts may result in the removal/demolition of potentially occupied bat maternity roosts. Consequently, construction-related impacts would be considered adverse and may result in a potentially significant impact. MM BIO-1 will mitigate the potentially significant impact to a less than significant level.

Finding

The County finds that changes or alterations have been incorporated into the Project that mitigate potentially significant direct, indirect, and cumulative impacts on the environment, as identified in the Final EIR. Specifically, the following mitigation measure is feasible and is adopted to mitigate potentially significant effects to native wildlife nursery sites to a less than significant level:

MM BIO-1 Prior to commencement of construction activities, a qualified Biologist shall conduct a pre-construction bat habitat assessment of the trees and/or structures marked for potential removal/demolition. Potential for roosting shall be categorized by (1) potential for solitary roost sites and (2) potential for colonial roost sites (i.e.,

ten bats or more). If the potential for colonial roosting is determined, those trees/structures shall not be removed during the bat maternity roost season (March 1 to July 31). Trees potentially supporting colonial roosts outside the maternity roost season, and trees potentially supporting solitary roosts, may be removed via a two-step removal process whereby, at the direction of the Biologist, some level of disturbance (such as trimming of lower branches) is applied to the tree on the day prior to removal to allow bats to escape during the darker hours, and the roost tree shall be removed the following day (i.e., there shall be no less or more than one night between initial disturbance and the grading or tree removal). Structures potentially supporting colonial roosts outside the maternity roost season and structures potentially supporting solitary roosts may be fitted with a bat exclusionary device at the entry location, whereby bats are allowed to leave the structure but are unable to return. The structure can be demolished the following day. The results of the pre-construction bat habitat assessment, and any measures taken to protect bats, shall be documented and provided to the Los Angeles County Department of Public Works.

Rationale for Finding

Common bat species such as California myotis form maternity colonies in places such as crevices of old snags, crevices of trees, bridges, and buildings. By requiring pre-construction bat surveys and bat exclusion in accordance with MM BIO-1, potential bat occupancy would be identified prior to construction and would avoid impacts that would result in the removal/demolition of potentially occupied bat maternity roosts.

Reference

Draft EIR Section 4.3, Biological Resources

Impact: Nesting Birds

As discussed under Threshold 4.3d, nesting birds are protected under the provisions of the Migratory Bird Treaty Act, and the Project must be constructed in accordance with the law. Suitable nesting habitat for migratory birds is present in mature trees and other structures on the Project site and in its adjacent areas and could be adversely impacted either directly or indirectly during the Project's short-term construction impacts. The loss of an active nest may be considered a violation of the Migratory Bird Treaty Act and the *California Fish and Game Code* protecting nesting birds and may result in a potentially significant impact. MM BIO-2 will mitigate the potentially significant impact to a less than significant level.

Finding

The County finds that changes or alterations have been incorporated into the Project that mitigate potentially significant direct, indirect, and cumulative impacts on the environment, as identified in the Final EIR. Specifically, the following mitigation measure is feasible and is adopted to mitigate potentially significant effects to nesting birds to a less than significant level:

MM BIO-2 The Project shall be conducted in compliance with the conditions set forth in the Migratory Bird Treaty Act (MBTA) and California Fish and Game Code with methods accepted by the U.S. Fish and Wildlife Service (USFWS) and the California Department of Fish and Wildlife (CDFW) to protect active bird/raptor nests. To the extent feasible, vegetation/tree removal shall occur during the non-breeding season for nesting birds (generally late September to early March) and

nesting raptors (generally early July to late January) to avoid impacts to nesting birds and raptors. If the nature of the Project requires that work be initiated during the breeding season for nesting birds and raptors (February 1 to August 31), a pre-construction survey shall be conducted by a qualified Biologist (i.e. one with experience conducting nesting bird surveys) for nesting birds and raptors within 3 days prior to clearing of any vegetation and/or any work near existing structures (i.e., within 300 feet for nesting birds, within 300 feet for nesting special status birds, and within 500 feet for nesting raptors). If the Biologist does not find any active nests within or immediately adjacent to the impact area, the vegetation clearing/construction work shall be allowed to proceed. A letter report shall be prepared and submitted to the Los Angeles County Department of Public Works to document the survey findings and recommended protective measures.

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

Rationale for Finding

Suitable nesting habitat for migratory birds is present in mature trees and other structures on the Project site and in its adjacent areas. With incorporation of MM BIO-2, seasonal avoidance or pre-construction surveys for nesting birds are required and thus identification and avoidance of suitable nesting habitat would be made prior to disruption of the nests.

Reference

Draft EIR Section 4.3, Biological Resources

Impact: Disturbance of Jurisdictional Drainages

As discussed under Threshold 4.3c, two drainage features that may be considered jurisdictional waters by the CDFW and/or the Regional Water Quality Control Board (RWQCB) were identified in an off-site potential disturbance area. These jurisdictional features may be regulated through the *California Fish and Game Code* and the Clean Water Act and both short-term and long-term impacts to them would be considered potentially significant. If the Project is implemented, potential trenching for the water line connection (temporary) and/or construction of a storm drain outlet (permanent) would result in discharge to either of these drainage features; permits from the

CDFW and/or the RWQCB may be required prior to Project implementation. MM BIO-3 will mitigate the potentially significant impact to less than significant.

Finding

The County finds that changes or alterations have been incorporated into the Project that mitigate potentially significant direct, indirect, and cumulative impacts on the environment, as identified in the Final EIR. Specifically, the following mitigation measure is feasible and is adopted to mitigate potentially significant effects to jurisdictional resources to a less than significant level:

MM BIO-3 If MLWDC implementation, including potential off-site trenching for the water line connection (temporary) and/or off-site construction of a storm drain outlet (permanent), would result in discharge to jurisdictional features, the County shall consult with the CDFW and the RWQCB to determine if the agency will consider the feature to be within their jurisdiction and require regulatory permits. If an agency indicates that the feature will not be regulated and no permit is required, no further action will be required for that agency. If an agency indicates that the feature will be regulated and permits are required, the balance of this Mitigation Measure, described below, shall be implemented prior to initiation of Project activities.

Prior to initiation of Project activities, the County shall obtain any necessary permits for impacts to Regional Water Quality Control Board (RWQCB) and CDFW jurisdictional areas. Mitigation for the loss of jurisdictional resources shall be negotiated with the resource agencies during the regulatory permitting process. Potential mitigation options shall include one or more of the following: (1) payment to a mitigation bank or regional riparian enhancement program (e.g., invasive plant or wildlife species removal) and/or (2) restoration of riparian habitat either on site or off site at a ratio of no less than 1:1, determined through consultation with the above-listed resource agencies. If in-lieu mitigation fees are required, prior to the initiation of any construction-related activities, the County shall pay the in-lieu mitigation fee to a mitigation bank/enhancement program for the in-kind (equivalent vegetation type and acreage) replacement of impacted jurisdictional resources. If a Restoration Program is required, prior to the initiation of any construction-related activities, County shall prepare and submit a Riparian Habitat Mitigation and Monitoring Program (HMMP) for USACE and CDFW approval. If a Riparian HMMP is required, it shall contain the following items:

- A. Responsibilities and qualifications of the personnel to implement and supervise the plan. The responsibilities of the Landowner, Specialists, and Maintenance Personnel that would supervise and implement the plan shall be specified.
- B. Site selection. The mitigation site shall be determined in coordination with the USACE, CDFW, and RWQCB. The site shall either be located in a dedicated open space area on County land, USFS land, or off-site land shall be purchased.
- C. Seed source. Seeds (or plantings) used shall be from local sources (within ten miles of the Project area) to ensure genetic integrity.
- D. Site preparation and planting implementation. Site preparation shall include (1) protection of existing native species; (2) trash and weed removal; (3) native species salvage and reuse (i.e., duff); (4) soil treatments (i.e., imprinting, decompacting); (5) temporary irrigation installation; (6) erosion-control

- measures (i.e., rice or willow wattles); (7) seed mix application; and (8) container species planting.
- E. Schedule. A schedule shall be developed which includes planting in late fall and early winter, between October 1 and January 30.
 - F. Maintenance Plan/Guidelines. The Maintenance Plan shall include (1) weed control; (2) herbivory control; (3) trash removal; (4) irrigation system maintenance; (5) maintenance training; and (6) replacement planting.
 - G. Monitoring plan. The Monitoring Plan shall include (1) qualitative monitoring (i.e., photographs and general observations); (2) quantitative monitoring (i.e., randomly placed transects); (3) performance criteria, as approved by the above-listed resource agencies; (4) monthly reports for the first year and reports quarterly thereafter; and (5) annual reports for five years, which shall be submitted to the resource agencies on an annual basis. The site shall be monitored and maintained for five years to ensure successful establishment of riparian habitat within the restored and created areas.
 - H. Long-term preservation. Long-term preservation of the site shall also be outlined in the conceptual Mitigation Plan to ensure the mitigation site is not impacted by future development.

Rationale for Finding

Two drainage features that may be considered jurisdictional waters by the CDFW and/or the RWQCB were identified in an off-site potential disturbance area. These jurisdictional features may be regulated through the *California Fish and Game Code* and the Clean Water Act. With implementation of MM BIO-3, the County is required to consult with the CDFW and the RWQCB to determine if the agency will consider the drainage feature to be within their jurisdiction and require regulatory permits. If an agency indicates that the feature will not be regulated and no permit is required, no further action will be required for that agency. If an agency indicates that the feature will be regulated and permits are required, the County must obtain all necessary permits for impacts to the CDFW and the RWQCB jurisdictional areas. Mitigation for the loss of jurisdictional resources shall be negotiated with the resource agencies and must include one or more of the following: (1) payment to a mitigation bank or regional riparian enhancement program (e.g., invasive plant or wildlife species removal) and/or (2) restoration of riparian habitat either on site or off site at a ratio of no less than 1:1, determined through consultation with the above-listed resource agencies. If in-lieu mitigation fees are required, prior to the initiation of any construction-related activities, the County shall pay the in-lieu mitigation fee to a mitigation bank/enhancement program for the in-kind (equivalent vegetation type and acreage) replacement of impacted jurisdictional resources. As a result, impacts to jurisdictional waters would be less than significant after mitigation.

Reference

Draft EIR Section 4.3, Biological Resources

3.3.3 Cultural Resources

Impact: Archaeological Resources

As discussed under Threshold 4.4b, grading and excavation associated with construction of the Project and trenching for subterranean utilities would have the potential to disturb any underlying archaeological resources, including tribal cultural resources, unique archaeological resources, or

historical resources. Disturbances to archaeological resources would be a potentially significant impact. MM CUL-1 will mitigate the potentially significant impact to less than significant.

Finding

The County finds that changes or alterations have been incorporated into the Project that mitigate potentially significant direct, indirect, and cumulative impacts on the environment, as identified in the Final EIR. Specifically, the following mitigation measure is feasible and is adopted to mitigate potentially significant effects to archaeological resources to a less than significant level:

MM CUL-1 Prior to the start of construction activities, a qualified Archaeologist shall be retained by the County to attend the pre-grading meeting with the construction contractor to establish, based on the site plans, appropriate procedures for monitoring earth-moving activities during construction. The Archaeologist shall determine, based on consultation with the County, when monitoring of grading activities is needed. Monitoring should observe disturbance in the uppermost layers of sediment including the younger Quaternary Alluvium (i.e. approximately 5 feet below ground surface or shallower) and if any archaeological resources are discovered, construction activities must cease within 50 feet of the discovery, as appropriate, and they shall be protected from further disturbance until the qualified Archaeologist evaluates them using standard archaeological protocols. The Archaeologist must first determine whether an archaeological resource uncovered during construction is a "Tribal Cultural Resources" pursuant to Section 21074 of the California Public Resources Code, or a "unique archaeological resource" pursuant to Section 21083.2(g) of the California Public Resources Code or a "historical resource" pursuant to Section 15064.5(a) of the State CEQA Guidelines. If the archaeological resource is determined to be a "Tribal Cultural Resource", "unique archaeological resource" or a "historical resource", the Archaeologist shall formulate a Mitigation Plan in consultation with the County of Los Angeles that satisfies the requirements of the above-listed Code Sections. Upon approval of the Mitigation Plan by the Los Angeles County Director of Public Works (DPW), the Project shall be implemented in compliance with the Plan.

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

Rationale for Finding

MM CUL-1 calls for a qualified Archaeologist to be retained by the County to attend the pre-grading meeting with the Construction Contractor to establish, based on the site plans, appropriate procedures for monitoring earth-moving activities during construction. The Archaeologist would determine, based on consultation with the County, when monitoring of grading activities is needed. Monitoring should observe disturbance of the uppermost layers of sediment (soils and younger Quaternary alluvium) and any archaeological resources discovered shall be salvaged and catalogued, as necessary. As a result, potential impacts to archaeological resources would be less than significant after mitigation.

Reference

Draft EIR Section 4.4, Cultural Resources

Impact: Paleontological Resources

As discussed under Threshold 4.4c, excavation activities on and off the site that would extend into older Quaternary sediments underlying the surface soils could disturb or destroy paleontological resources beneath the site. Disturbance or destruction of paleontological resources would be a potentially significant impact. MM CUL-2 will mitigate the potentially significant impact to less than significant.

Finding

The County finds that changes or alterations have been incorporated into the Project that mitigate potentially significant direct, indirect, and cumulative impacts on the environment, as identified in the Final EIR. Specifically, the following mitigation measure is feasible and is adopted to mitigate potentially significant effects to paleontological resources to a less than significant level:

MM CUL-2 Prior to the start of ground disturbing activities in native soils, a qualified Paleontologist shall be notified and retained when earth-moving activities are anticipated to impact undisturbed deposits in the older Quaternary alluvium on the Project site (i.e. approximately 5 feet below ground surface or deeper). The designated Paleontologist shall be present during the pre-grade meeting to discuss paleontological sensitivity and to assess whether scientifically important fossils have the potential to be encountered. The Paleontologist shall determine, based on consultation with the County, when monitoring of grading activities is needed based on the on-site soils and final grading plans.

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

Rationale for Finding

MM CUL-2 calls for a qualified Paleontologist to be retained by the County to monitor excavations into undisturbed deposits in the older Quaternary alluvium, which lies at an unknown depth below the younger Quaternary alluvium. The Paleontologist would evaluate any fossil resources found during excavation activities. If a fossil resource is determined to be significant, the Paleontologist would formulate and implement a plan to recover and/or salvage the resource. As a result, potential impacts to paleontological resources would be less than significant after mitigation.

Reference

Draft EIR Section 4.4, Cultural Resources

3.3.4 Hazards and Hazardous Materials

Impact: Accidental Release of Hazardous Materials

As discussed under Threshold 4.7b, there is a potential for exposure to asbestos-containing materials (ACMs) and lead-based paint during renovation and/or demolition activities due to the age of some of the existing buildings. Demolition of the existing buildings and the rehabilitation of other existing buildings could release asbestos fibers that would be hazardous to the demolition crew. Rehabilitation of a number of existing structures may also lead to the release of asbestos fibers. Demolition and renovation activities could also expose the construction and demolition crew to lead from lead-based paint. Release of asbestos fibers and exposures to lead from lead-based paint would be a significant impact. MM HAZ-1 and MM HAZ-2 would reduce this potential impact to less than significant.

Finding

The County finds that changes or alterations have been incorporated into the Project that mitigate potentially significant direct, indirect, and cumulative impacts on the environment, as identified in the Final EIR. Specifically, the following mitigation measures are feasible and are adopted to mitigate potentially significant effects due to the release of hazardous materials to a less than significant level:

MM HAZ-1 In the event that building materials are encountered during construction activities that are suspected of being asbestos-containing materials (ACMs), these materials shall be assumed to contain asbestos and shall be handled, removed, transported and/or disposed in accordance with applicable ACM regulations, until such time that they can be sampled and evaluated for asbestos content.

Prior to Project occupancy, an Operations and Maintenance (O&M) Plan shall be prepared by a CalOSHA-certified Asbestos Consultant and implemented by building maintenance staff who have undergone at least 16 hours of asbestos O&M training. The O&M Plan shall be subject to review and approval by the County of Los Angeles Director of Public Works and shall require periodic observation, inspection, and documentation by designated staff to ensure that ACMs do not become damaged and do not result in airborne asbestos fiber release. Any required removal of asbestos shall be made under the direction of a CalOSHA Certified Asbestos Consultant.

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

Rationale for Finding

MM HAZ-1 requires that, in the event that suspect building materials that have not been previously sampled are observed during renovation/remodeling activities, these materials should be assumed to contain asbestos until such time that they can be accessed, sampled, and evaluated for asbestos content. The suspect building materials that are not evaluated for asbestos shall be

handled, removed, transported, and disposed of in compliance with existing regulations that would allow for the proper removal and disposal of ACMs and asbestos-containing construction materials (ACCMs), including AVAQMD Rule 1403 and California Occupational Safety and Health Administration (CalOSHA) regulations on asbestos abatement. MM HAZ-1 would prevent the accidental release of asbestos fibers.

MM HAZ-2 is needed to ensure that lead exposure is prevented. MM HAZ-2 requires that, in the event that suspect painted or ceramic surfaces that have not been previously sampled are observed during renovation/remodeling activities, these materials should be assumed to contain lead-based paint until such time that they can be accessed, sampled, and evaluated for lead content. In the event that suspect materials that have not been previously sampled are observed during renovation/remodeling activities, these materials should be assumed to contain lead in concentrations exceeding the Los Angeles County Department of Health Services' definition of 0.7 milligrams per square centimeter (mg/cm², or 600 parts per million) until such time that they can be accessed, sampled, and evaluated for lead content.

MM HAZ-1 and MM HAZ-2 would reduce potential impacts related to the release of hazardous materials to less than significant.

Reference

Draft EIR Section 4.7, Hazards and Hazardous Materials

Impact: Off-Site Hazardous Sites

As discussed under Threshold 4.7d, there is an existing fueling station outside the Project site boundary that may be used by the Project. As shown in the California Environmental Reporting System (CERS) database and the Monitoring System Certification by AW Associates in Appendix E to this Final EIR, the tank permits were updated in 2015 and have passed subsequent leak detection tests and are now in compliance. Soil testing also indicated there is no soil contamination near the USTs (Converse 2016b). Therefore, MM HAZ-3 that requires the testing and repair, as necessary, of the USTs has begun to be implemented. Implementation of MM HAZ-3 would reduce potential impacts to less than significant levels.

Finding

The County finds that changes or alterations have been incorporated into the Project that mitigate potentially significant direct, indirect, and cumulative impacts on the environment, as identified in the Final EIR. Specifically, the following mitigation measure is feasible and is adopted to mitigate potentially significant effects due to off-site hazardous sites to a less than significant level:

MM HAZ-3 Prior to the use of the off-site fueling station by any Project-related activities, including any construction activities, the underground storage tanks (USTs) at the off-site fueling station shall be tested and repaired as necessary, subject to inspection and approval by the Los Angeles County Fire Department, as the Certified Unified Program Agency (CUPA).

Rationale for Finding

MM HAZ-3 requires that prior to the use of the off-site fueling station by any Project-related activities, including any construction activities, the USTs at the off-site fueling station shall be tested and repaired as necessary, subject to inspection and approval by the LACFD, as the

Certified Unified Program Agency (CUPA). MM HAZ-3 would reduce potential impacts related to the off-site hazards to less than significant.

Reference

Draft EIR Section 4.7, Hazards and Hazardous Materials

3.3.5 Noise

Impact: Temporarily Exceed County Noise Ordinance Limits

As discussed under Thresholds 4.10a and 4.10d, stationary noise sources associated with Project construction would include air compressors, generators, and cranes. The maximum noise levels from operation of a generator at 50 feet are approximately 82 dBA with a load factor of 50 percent. The most restrictive County day-time stationary equipment noise standard is 60 dBA. The noise level from a generator would not exceed 60 dBA average noise level (L_{eq}) at distances of 450 feet. Project construction that would occur within 450 feet of the receptors on 60th Street West would not be anticipated to use a generator or other stationary piece of diesel equipment, but if it would operate within 450 feet, a significant noise impact would result from temporary construction activities. MM NOI-1 would reduce this potential impact to less than significant.

Finding

The County finds that changes or alterations have been incorporated into the Project that mitigate potentially significant direct, indirect, and cumulative impacts on the environment, as identified in the Final EIR. Specifically, the following mitigation measure is feasible and is adopted to mitigate potentially significant effects due to temporary construction noise to a less than significant level:

MM NOI-1 The County of Los Angeles Department of Public Works shall include the following requirement in the Contractor's Specifications:

Stationary equipment, such as generators and air compressors, shall be located at least 450 feet from the residences on 60th Street West opposite the Project site. If stationary equipment use is required to be closer than 450 feet, the equipment shall include an enclosure or similar noise attenuation if needed to limit the average hourly daytime noise level at the nearest residential property line to 60 A-weighted decibels (dBA) or less. Proof of compliance, such as noise measurements during construction activities, shall be provided to the County of Los Angeles Department of Public Works within one week of the start of use of stationary equipment within 450 feet of a residence.

Rationale for Finding

MM NOI-1 would limit stationary source noise to less than the County noise ordinance limit. By providing the closest distances at which equipment will be located and requiring noise measurements to prove compliance, impacts associated with construction noise would be reduced to a less than significant level.

Reference

Draft EIR Section 4.10, Noise

3.3.6 Utilities and Service Systems

Impact: Water Supply

As discussed under Threshold 4.14d, the LACWWD 40's 2014 water supply was approximately 50,447 acre-feet per year (afy). The 20-year planning period starting in 2015 (utilized to be consistent with the 2010 Integrated Regional Urban Water Management Plan [IRUWMP] for the Antelope Valley) was used in the Project's Water Supply Assessment (WSA) and summarized in the Draft EIR. As required under SB 610, the WSA included an evaluation of the sufficiency of the water supplies available to the LACWWD 40 to meet existing and anticipated future demands (including the demand associated with the Project) over a 20-year horizon that includes normal, single-dry, and multiple-dry years. The multiple-dry year scenario would represent drought conditions.

The WSA conservatively assumes that the projected demand included in the 2010 IRUWMP did not include any additional demand for the development of the Project. The Project would increase this demand by approximately 244 afy, which is anticipated to come online in 2018. The WSA estimates that LACWWD 40's water demand by 2035 would be approximately 131,000 afy, including the demand from proposed Project, plus all committed demand and projected new demand growth. This projection is consistent with the LACWWD's 2010 IRUWMP water demand increase projections. Analysis of water supply projections for LACWWD 40 demonstrates that projected and planned new supplies will meet demands through year 2035. These projections consider water development programs and projects as well as water conservation.

However, imported water from the State Water Project (SWP) could experience large swings in available supply depending on rainfall and snowpack conditions. The California Department of Water Resources (DWR) publishes a detailed report every other year, which updates the reliability of the SWP in terms of likelihood of deliveries during average years, single-dry years, and various multiple-dry year drought periods for both existing conditions and projected conditions 20 years into the future. These projections are based on past measured hydrologic events in the SWP service area watershed and complex modeling. Estimates of imported SWP water from the Antelope Valley–East Kern Water Agency (AVEK) has been adjusted for the average year, single-dry year, and multiple-dry years based on the most current Draft SWP Reliability Report 2013 using the same percent allocations from the IRUWMP.

During the single-dry year and multiple-dry years, groundwater banking programs, the purchase of new imported supplies, water transfers, water conservation, and expansion of recycled water systems are expected to meet the reductions in imported water availability to meet demand. Without these measures and the financial arrangements that allow for the purchasing of new water supplies, impacts would be significant. MM UTL-1 would reduce this potential impact to a less than significant level.

Finding

The County finds that changes or alterations have been incorporated into the Project that mitigate potentially significant direct, indirect, and cumulative impacts on the environment, as identified in the Final EIR. Specifically, the following mitigation measure is feasible and is adopted to mitigate potentially significant effects due to water supply to a less than significant level:

MM UTL-1 The County shall enter the New Water Supply Entitlement Acquisition program established by the County Waterworks District No. 40 (LACWWD No. 40) and pay a deposit of \$10,000 per acre-foot of annual water demand from the Project for the acquisition of additional water supplies from Antelope Valley-East Kern Water

Agency (AVEK) to serve the Project, pursuant to the August 13, 2013 Memorandum of Understanding between LACWWD No. 40 and AVEK.

Rationale for Finding

MM UTL-1 requires that in accordance with the LACWWD 40's New Supply Acquisition program and the LACWWD 40's Memorandum of Understanding (MOU) with AVEK to serve the Project, the County would sign a New Water Supply Entitlement Acquisition Agreement with the LACWWD 40 and pay a proposed deposit of \$10,000 per acre-foot of annual water demand from the Project. The LACWWD 40 would then provide these fees to AVEK to purchase the water supply for LACWWD 40 and the Project. Impacts would be less than significant after mitigation.

Reference

Draft EIR Section 4.14, Utilities and Service Systems

4.0 SIGNIFICANT EFFECTS THAT CANNOT BE MITIGATED TO BELOW THE LEVEL OF SIGNIFICANCE

Pursuant to Section 15126.2(b) of the State CEQA Guidelines, the EIR considers the significant environmental effects that cannot be avoided if the Project is implemented. With implementation of mitigation measures in Section 4.0 of the Mira Loma Women's Detention Center Project EIR, all potentially significant direct, indirect, and cumulative Project impacts would be reduced to less than significant levels. No significant unavoidable adverse impacts would occur with Project implementation. As a result, preparation of a Statement of Overriding Considerations is not required.

5.0 FINDINGS ON PROJECT ALTERNATIVES

Even though the proposed Project will not result in significant unavoidable environmental effects after implementation of mitigation, as outlined above, the County considered the potential for environmentally superior alternatives to the Project. The EIR must focus its analysis of alternatives on those that "could feasibly attain most of the basic objectives of the project". However, Guidelines Section 15126.6(b) also requires an EIR to examine alternatives "capable of avoiding or lessening" environmental effects even if these alternatives "would impede to some degree the attainment of the project objectives or would be more costly".

These findings contrast and compare the alternatives analyzed in the Final EIR, where appropriate, to show that the selection of the proposed Project would have substantial environmental, planning, fiscal, and other benefits. In rejecting certain alternatives, the County has examined both the environmental impacts and the Project objectives and weighed the ability of the various alternatives to meet the objectives. The County finds, after due consideration of a reasonable range of alternatives as set forth in the EIR and below, that the proposed Project best attains a balance between opening the MLWDC and protecting against local environmental impacts and best meets the project goal and objectives with the least environmental impact.

5.1 ALTERNATIVES SCREENED OUT FROM DETAILED CONSIDERATION IN THE ENVIRONMENTAL IMPACT REPORT

As stated in Section 15126.6(f)(2) of the State CEQA Guidelines, the first step in the alternatives analysis is to determine whether any of the significant effects of the Project would be avoided or substantially lessened by putting the Project in another location. Only locations that would avoid

or substantially lessen the Project's significant effects need be considered for inclusion in the EIR. Importantly, the MLWDC Project is a renovation project that would utilize existing on-site facilities and improvements, and there is no alternate site that could be a feasible alternative for a renovation project. The only other unoccupied County jail facility that would be available for renovation for this purpose would be the Sybil Brand Institute (SBI), which is discussed below. Additionally, because the proposed MLWDC Project would have no significant environmental impacts after mitigation, there is no need to evaluate alternate locations to avoid impacts. Section 15126.6(f)(3) further states that "an EIR need not consider an alternative whose effect cannot be reasonably ascertained and whose implementation is remote and speculative".

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 2013 letter from CEO to Board of State and Community Corrections states that the County's jail planning inventoried and evaluated all existing County jail facilities, including Men's Central Jail (MCJ); Twin Towers Correctional Facility (TTCF)/Correctional Treatment Center (CTC); Century Regional Detention Facility (CRDF); Pitchess Detention Center East (PDC East); Pitchess Detention Center North (PDC North); Pitchess Detention Center South (PDC South); and North County Correctional Facility (NCCF). The *Los Angeles County Jail Plan Independent Review and Comprehensive Report* (Jail Plan Report) also inventoried SBI and the MLDC. Potentially feasible alternate locations are limited to those alternative sites that also currently contain County-owned jail/detention facilities.

A list of the County-owned detention centers and jails was used to determine whether any of those properties should be evaluated in the alternatives analysis for detailed consideration and were compared to the Project Objectives for consistency as discussed in Chapter 5 of the EIR. The Project Objectives are summarized here:

The objectives of the Project are as follows:

- A. To prioritize the on-site integration of gender-responsive female inmate education, treatment, and vocational training to reduce female inmate recidivism.
 - 1. To maximize system-wide efficiencies for County jails by providing a women's facility that meets the needs of the female population allowing for Gender Responsive Rehabilitation (GRR) model programming for eligible low- to medium-security female inmates.
 - 2. To provide a facility reflective of "real world" living that incorporates abundant natural light, opportunities for social interactions in landscaped open spaces, and defined functional areas to promote release readiness and community reintegration within a secured detention perimeter.
 - 3. To reduce recidivism through programming and development of a women's detention facility at a site with sufficient space to accommodate both campus-style inmate housing and support facilities for education and vocational training, implementing the best practices of Education Based Incarceration (EBI), within a secured detention perimeter.
- B. To provide a detention facility with capacity for eligible low- to medium-security level female inmates.
 - 4. To permit re-allocation of detention facilities designed for higher security levels for male inmates and/or inmates with special security or other needs to serve the appropriate security-level populations.

5. To provide a facility with adequate capacity for a selected subset of the female inmate population based on security level and health status based on system trend analysis from data 2001-2013, which includes the beginning of the "AB 109" population of Low – Level (N3) Offender Population, and later state law changes.
 6. To reduce inmate overcrowding according to the BSCC standards for rated capacity, as determined for the qualifying female inmate population.
- C. To maximize the financial resources available to the County's correctional system for construction and operation of jail facilities serving female inmates.
7. To avoid or minimize land acquisition and entitlement costs and to efficiently use existing County-owned physical assets.
 8. To avoid or minimize costs and delays to resolve easement and other land title clearances involving other parties' property interests.
 9. To avoid new land use conflicts by prioritizing the re-use of currently or formerly operated County-owned property with detention facilities.
 10. To control the higher costs of new construction compared to the cost of renovation of existing facilities and the higher costs of maximum security construction compared to medium and low security detention facility construction by renovating and re-purposing existing facilities and infrastructure and/or designing separate low and medium security detention facilities where feasible.
 11. To maximize the use of state grant funds from AB 900 and any other grant funds, including the maximization of the number of female inmate beds covered per grant.
 12. To minimize the County's net cost to fund a female detention facility, including long-term operation and maintenance costs.

Three alternatives were considered and rejected during the scoping and project planning process. They were: (1) Alternate Location – Female Inmate Transfer to Existing and Occupied Male Jail Facilities; (2) Alternate Location – New Women's Facility at SBI; and (3) Alternate Location – Building Expansion at CRDF. These three alternatives would fail to meet most of the basic objectives, as explained below:

1. **Alternate Location – Female Inmate Transfer to Existing and Occupied Male Jail Facilities.** The use of higher-security structures occupied with male inmates as an alternative to the rehabilitation of MLDC would be infeasible for a number of reasons. Vacating an existing occupied facility in order to house the female inmate population would be contrary to the majority of the basic Project objectives. However, this Alternative would partially meet some of the Project objectives of the proposed Project. This Alternative is consistent with Objective 5 but does not meet Objectives 1 through 4, 6, 11, and 12. It is unknown whether this Alternative would meet Objectives 7 through 10. Therefore, the potential redevelopment of existing high-security County-owned facilities for use by female inmates was eliminated from further consideration as an alternative to the Project.
2. **Alternate Location – New Women's Facility at Sybil Brand Institute.** There were several site development constraints that contributed to the elimination of the property for further consideration of development for the female custody facility, including its proximity to the Cogen landfill and geotechnical constraints. Also, the development proposal for the SBI property would not satisfy the majority of the basic Project objectives. This Alternative

would partially meet some of the Project objectives of the proposed Project. This Alternative is consistent with Objectives 8 and 9 and partially consistent with Objectives 1 through 4, 6, and 7. However, it does not meet Objectives 5 and 10 through 12. As such, the potential demolition of the SBI facility and subsequent construction of 1,024 beds for female inmates was eliminated from further consideration as an alternative to the Project.

3. **Alternate Location – Building Expansion at CRDF.** While the provision of gender-responsive female inmate education, treatment, and vocational training at the CRDF could be accommodated by a new building and the addition of new upper floors on existing buildings, this proposal would not provide campus-style inmate housing and outdoor support and recreational sport facilities. It would also increase County costs in the long-term by operating a high-security facility for low- to medium-security inmates, and it would not allow for the redistribution of County detention facility assets to serve the appropriate security level inmate population. This proposal would also not satisfy the majority of the basic Project objectives. This Alternative would partially meet some of the Project objectives of the proposed Project. This Alternative is consistent with Objectives 5, 6, 8, and 9 and is partially consistent with Objectives 3, 7, 10, and 11. However, it does not meet Objectives 1, 2, 4, or 12. Therefore, it was eliminated from further consideration as an alternative to the Project.

Finding

The County finds that all of the alternatives eliminated from further consideration in the Draft EIR are infeasible and/or would not meet most Project objectives, for the reasons detailed in Section 5.0, Alternatives in the Draft EIR.

5.2 ALTERNATIVES ANALYZED IN THE ENVIRONMENTAL IMPACT REPORT

5.2.1 Alternative 1A: No Project/Continuation of Existing Operations

Section 15126.6(e) of the State CEQA Guidelines requires that an EIR evaluate a “No Project” alternative in order to allow decision makers to compare the impacts of approving the proposed MLWDC Project with the impacts of not approving the proposed Project. Section 15126.6(e)(2) of the State CEQA Guidelines specifies that the “No Project analysis shall discuss the existing conditions at the time the Notice of Preparation is published, or if no notice of preparation is published, at the time environmental analysis is commenced, as well as what would be expected 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”. Alternative 1A as analyzed along with purpose and need for the Project as summarized in Section 2.2 of this document are responsive to some of the comments received on the Draft EIR that called on the County not to build any new or renovated detention facilities.

The State CEQA Guidelines goes on to define two possible methods of analyzing the No Project alternative. State CEQA Guidelines Section 15126.6(e)(3)(A) states that if the project is the revision of an existing land use or regulatory plan, policy, or ongoing operation, the analysis should assume the continuation of the existing plan, policy, or operation into the future.

The proposed Project, as defined in Section 3.0, Project Description, of the Draft EIR, does not include any changes to the existing land use or regulatory plan or policy; however, it would change the “ongoing operation” of the MLDC. The MLDC has not housed any inmates or served any detention functions since November 2012, when the Immigration and Customs Enforcement (ICE) terminated their contract with the County and withdrew from the site. Current staffing levels are minimal, with County staff on site daily for security. The MLDC is not occupied by inmates, nor is

it serving any detention functions. Therefore, the requirement to analyze the continuation of the current "ongoing operation" of the Project site as required in State CEQA Guidelines Section 15126.6(e)(3)(A) is discussed below. In addition, the approach set forth in State CEQA Guidelines Section 15126.6(e)(3)(B) is discussed as Alternative 1B.

Under Alternative 1A, the MLDC site would remain in its existing unoccupied condition and no renovation or new construction would occur. Under Alternative 1A, female inmates would remain at the CRDF and no changes to existing CRDF facilities or operations would occur. CRDF has both dorm and high-security single/double cell configurations. The cell configuration limits a communal environment and programming opportunities. As Alternative 1A does not propose a new facility or a change to an existing facility within the County's jail system, there would be no improvements or alterations to County facilities or operations. EBI and GRR model programming and support services to reduce recidivism and to increase the success of transitioning out of the correctional setting would be provided at the same levels as currently offered in CRDF but would be substantially less when compared to the proposed MLWDC Project due to the lack of space at the CRDF.

As discussed above in Section 2.2, the Board of Supervisors has adopted numerous recent actions to reduce the number of people who are incarcerated in Los Angeles County, particularly those with mental illness and/or substance use disorders. The Board of Supervisors' 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 in a document entitled "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". Potential environmental impacts associated with "no action" on the proposed Project are described in Alternative 1A, No Project/Continuation of Existing Operations, as well as in Alternative 1B, No Project/Predictable Actions (summarized below), as demonstrated in Section 5.0, Alternatives. These alternatives provide information regarding the potential impacts to the environment if the County does not move forward with the proposed Project.

Summary of Environmental Effects and Achievement of Project Objectives

The proposed MLWDC Project would not result in any significant impacts after mitigation. Alternative 1A would result in no change to the environment and would therefore have no environmental impacts. As there would be no environmental impacts associated with Alternative 1A, it would be considered environmentally superior to the proposed MLWDC Project, as summarized in Table 5-6 in Section 5.0, Alternatives, of the Draft EIR. However, the County finds that Alternative 1A would not meet most of the basic Project objectives, as discussed in Table 5-7 in Section 5.0, Alternatives, of the Draft EIR.

Finding

The County finds that Alternative 1A is infeasible because, although it is environmentally superior to the proposed Project, it does not meet the Project objectives as effectively as the proposed Project and it would not realize the benefits of Project implementation. The Project benefits that would not be obtained through Alternative 1A include, but are not limited to, (1) maximizing systemwide efficiencies for County jails and reducing overcrowding; (2) providing a facility reflective of "real-world" living that incorporates functional areas to promote vocational training, gender-responsive programs, release readiness, and community reintegration; (3) maximizing the use of state grant funds from AB 900 and any other grant funds; and (4) minimizing the County's net cost to fund a female detention facility by repurposing existing County-owned facilities and infrastructure.

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

5.2.2 Alternative 1B: No Project/Predictable Actions

Section 15126.6(e)(3)(B) of the State CEQA Guidelines must identify and analyze the circumstance in which the proposed Project does not proceed. Alternative 1B is required to discuss “the environmental effects of the property remaining in its existing state against environmental effects which would occur if the project is approved. If disapproval of the project under consideration would result in predictable actions by others, such as the proposal of some other project, this ‘no project’ consequence should be discussed”. Alternative 1B as analyzed along with purpose and need for the Project as summarized in Section 2.2 of this document are responsive to some of the comments received on the Draft EIR that called on the County not to build any new or renovated detention facilities.

It is predictable that if the proposed Project did not proceed, that the County would eventually put the MLDC property to use in some form. Under this Alternative, the existing and future female inmate population would continue to be housed at the CRDF. It is unlikely that the County would allow the MLDC property to remain vacant for numerous years, resulting in the inefficient use of a County-owned asset. The County could choose to sell the MLDC property for redevelopment by another entity or could choose to demolish the facilities for County reuse for a non-detention facility purpose.

Summary of Environmental Effects and Achievement of Project Objectives

Alternate uses for the property if the proposed Project is not approved is not reasonably foreseeable and would be speculative.

Findings

The County finds that Alternative 1B is infeasible because future uses of the Project site are unknown and any environmental impacts associated with unknown future uses is not reasonably foreseeable and would be speculative. Therefore, it cannot be said that Alternative 1B would meet the Project objectives of the proposed Project or realize the benefits of Project implementation. The Project benefits that would not be obtained through Alternative 1B include, but are not limited to, (1) maximizing systemwide efficiencies for County jails and reducing overcrowding; (2) providing a facility reflective of “real-world” living that incorporates functional areas to promote vocational training, gender-responsive programs, release readiness, and community reintegration; (3) maximizing the use of state grant funds from AB 900; or (4) minimizing the County's net cost to fund a female detention facility by repurposing existing County-owned facilities and infrastructure.

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

5.2.3 Alternative 2: Alternate Location – New Women's Facility at Pitchess Detention Center

Alternative 2 proposes the construction of a new women's detention facility on a 21-acre area on a vacant and undeveloped portion of the secured Pitchess Detention Center (PDC). As previously discussed, this alternative was previously proposed by the County for consideration but was subsequently rejected by the Board in favor of evaluating the proposed Project location.

Alternative 2 would require the demolition and development of approximately 21 acres in a largely undeveloped and underutilized area of the PDC to allow the construction and operation of a new facility. The new PDC facility would provide a 1,156-bed low- to medium-security, rehabilitation-based, female inmate detention facility with a 26-bed medical clinic and appurtenant facilities, and a parking garage for staff. Approximately 324 new employees would be required, including approximately 34 new medical personnel and approximately 290 new custody officers.

Approximately 237,700 square feet (sf, i.e., 26 percent) of the site would be developed with buildings; approximately 105,000 sf (12 percent) would be developed with the 2-story parking garage; approximately 370,000 sf (41 percent) would be landscaped areas; and approximately 185,000 sf (21 percent) would be paved areas, including roadways and sidewalks. Inmate housing would be provided in separate dormitories, along with nearby support facilities (e.g., kitchen/dining hall, clinic, classrooms, outdoor recreation areas, visitation areas, administration and staff areas, and parking areas). Structures would be built to meet the equivalent rating of a Leadership in Energy and Environmental Design (LEED) certification, and infrastructure improvements would be provided to serve individual buildings under this alternative. Similar to the Project, this alternative would provide program space for EBI and GRR.

Under Alternative 2, approximately 1,156 low- to medium-level-security female inmates would be transferred from the CRDF to the new facility within the PDC, which is a reduction in capacity of approximately 28 percent compared to the proposed MLWDC Project. This reduced capacity to house all of the qualifying female inmate population under Alternative 2 would necessitate the remaining females to be at CRDF, thereby requiring CRDF to become a mixed male/female facility, decreasing the efficiency of reallocating higher-security facilities to the overcrowded male inmate population. Alternative 2 would duplicate certain operations and staffing due to the need to operate and maintain two separate facilities for the same purpose. Maintaining female inmate housing at both PDC and CRDF would require duplication of medical services spaces to provide the specific medical needs of the female inmate population. As with the Project, no inmate bookings or releases would occur at the PDC.

Summary of Environmental Effects and Achievement of Project Objectives

The proposed MLWDC Project would not result in any significant impacts after mitigation. Alternative 2 would likely result in less than significant impacts after mitigation to the environment. It would have increased impacts on hydrology because the site is located within a 100-year floodplain; however, that impact could be reduced to less than significant through mitigation. Therefore, neither the proposed Project nor Alternative 2 would be considered environmentally superior when compared to the other, as summarized in Table 5-8 in Section 5.0, Alternatives, of the Draft EIR.

Finding

The County finds that Alternative 2 is infeasible because it would not be considered environmentally superior to the proposed Project; would not meet the majority of the Project objectives; and would not realize the benefits of Project implementation. The Project benefits that

would not be obtained through Alternative 2 include, but are not limited to, (1) avoiding conflicts due to land easements and title clearances; (2) maximizing the use of state grant funds from AB 900 and any other grant funds; (3) avoiding costs associated with new construction; or (4) minimizing the County's net cost to fund a female detention facility by repurposing existing County-owned facilities and infrastructure.

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

5.2.4 Alternative 3: Alternate Location – New Annex at Century Regional Detention Facility

Alternative 3 proposes to retain the female inmate population at CRDF and expand the existing facility to provide building space for the EBI and GRR model programming. This alternative reflects the grant application proposal submitted by the County to the BSCC under Senate Bill (SB) 863, Adult Local Criminal Facilities Construction Financing.

The expansion potential at the CRDF is limited because the site is largely developed with buildings and parking areas, and there is limited available land area at or near the site for lateral expansion. The site for the facility is almost fully developed and surrounded by existing land uses, with no vacant land nearby available for expansion. CRDF has both dorm and high-security single/double cell configurations. The cell configuration limits a communal environment and programming opportunities. In order to maintain the female population at the CRDF and to incorporate the GRR model programming, EBI programs, and recreational opportunities, Alternative 3 proposes to construct a new building (Treatment and Programming Annex Facility) and outdoor visitation area at the courtyard area of the CRDF.

The proposed Annex Facility will be a 3-story building with 25,000 square feet of floor area to be constructed in the landscaped area between existing buildings. The facility will include six treatment rooms, four classrooms, and support areas to accommodate staff and health professionals involved in the treatment and provision of medical, mental health, and substance abuse services, as well as provide educational and vocational training to inmates. The facility will also include space for contact visiting, a rooftop recreation area, and a 17,500-square-foot outdoor visiting area at the center of the CRDF. Construction of the new building and outdoor visitation area could be conducted while CRDF remains occupied by the inmate population and no temporary displacement of inmates would be required.

Summary of Environmental Effects and Achievement of Project Objectives

The expansion of the CRDF through the construction of the proposed Annex Facility would avoid the creation of environmental impacts at the MLDC site but would result in environmental impacts at the CRDF. The proposed Project would not result in any significant impacts after mitigation. Alternative 3 would result in no impacts on population and housing, public services, and recreation and a similar level of environmental impacts on all other issues when compared to the proposed Project. Therefore, neither the proposed Project nor Alternative 3 would be considered environmentally superior when compared to the other, as summarized in Table 5-10 in Section 5.0, Alternatives, of the Draft EIR.

Finding

The County finds that Alternative 3 is infeasible because it would not be considered environmentally superior to the proposed Project; would not meet the majority of the Project objectives; and would not realize the benefits of Project implementation. The Project benefits that would not be obtained through Alternative 3 include, but are not limited to, (1) providing campus-style inmate housing and outdoor support and recreational sport facilities; (2) decreasing County costs in the long-term by operating a high-security facility for low- to medium-security inmates; (3) allowing for the redistribution of County detention facility assets to serve the appropriate security level inmate population.

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

5.2.5 Alternative 4: Reduced Mira Loma Women's Detention Center Capacity – No Expansion

Alternative 4 proposes the reuse of the MLDC site with no expansion of capacity and no new building construction. The MLDC closed in 1993 as a County detention facility and reopened in 1997 as a federal detention facility to accommodate the ICE Bureau. The BSCC establishes the minimum standards for local adult and juvenile detention facilities and conducts biennial inspections for compliance. In order to repurpose the MLDC as a County facility, an inspection was conducted in September 2012 by the BSCC to determine compliance with the *California Code of Regulations*.

The following improvements to MLDC were mandated by the inspection in order to open MLDC with a BSCC-rated capacity of 1,040 inmates:

- Add additional seating to each barrack
- Provide one toilet upgrade per administrative segregation cell
- Flush mount all fire sprinklers, smoke alarms, and vents in-administrative segregation cells
- Add incident alarm buttons to each barrack

The County Department of Public Health (DPH) inspected MLDC on October 2, 2012, and requested numerous kitchen upgrades, including, but not limited to, installing new exhaust hoods; repairing floors; securing/enclosing electrical conduits; repairing tiles; replacing sinks and stoves; replacing refrigerators/freezers; repairing food storage rooms; and providing a new mop/sink area. Dorm restrooms also required repair, including repairing floor and wall tile; renovating shower ceilings; fixing slow draining pipes; and replacing missing grout. However, it was noted these upgrades would not preclude MLDC from opening as long as progress was made toward compliance.

Additional required upgrades would be needed for Barracks E and F, which had not housed inmates in several years. A new heating and air conditioning system would be required, along with replacement tiles for the showers and new paint.

Other required improvements and renovations would generally include measures to make the facility fully operational, such as repairs to and/or replacement of the Central Plant (i.e., steam generation) with either a new central plant or package units at the various buildings; back-up

energy generators; development of state-of-the-art communications standards through a central control; improvements to the kitchen building; and new water supplies and infrastructure connections to LACWWD 40. These improvements would allow for the MLDC to accommodate 1,040 beds with no substantive new building construction or changes to existing facilities.

Accordingly, the site would not need to be brought into compliance with current drainage and water quality standards (e.g., LID and Standard Urban Stormwater Mitigation Plan [SUSMP] requirements), because the renovations would only involve repairs to make the site operational, rather than renovations to accommodate an expansion that would mandate new permitting requirements. Some of the proposed GRR model programming could be accommodated on the reopened MLDC property within the existing facilities but at a less comprehensive level, and some programs would not be instituted at all, including the culinary arts program.

Under Alternative 4, approximately 1,040 low- to medium-level security female inmates would be transferred from the CRDF to the MLDC, which is a reduction in capacity of approximately 35 percent compared to the proposed MLWDC Project. This 35 percent reduction in the capacity under Alternative 4 to serve the qualifying female inmate population would necessitate the remaining females to remain at CRDF, thereby requiring CRDF to become a mixed male/female facility, decreasing the efficiency of services to female inmates and reducing the effectiveness of reallocating higher-security facilities to the overcrowded male inmate population. Alternative 4 would duplicate certain operations and staffing due to the need to operate and maintain two separate facilities for the same purpose. Maintaining female inmate housing at both CRDF and MLDC would require duplication of medical services spaces to provide the specific medical needs of the female inmate population.

Summary of Environmental Effects and Achievement of Project Objectives

The proposed Project would not result in any significant impacts after mitigation. Alternative 4 would result in lower levels of environmental impacts when compared to the proposed Project. Therefore, Alternative 4 would be considered environmentally superior when compared to the proposed Project, as summarized in Table 5-12 in Section 5.0, Alternatives, of the Draft EIR.

Alternative 4 would provide a 35 percent reduction in capacity to serve eligible low- to medium-security-level female inmates at the MLDC site when compared to the Project, requiring a division of services with the CRDF. The provision of GRR and EBI programs would be reduced under Alternative 4 due to the lack of new/expanded facilities to provide customized services. The culinary arts program would be eliminated. Alternative 4 would have a reduced effect on delivery of services/continuity of programs, with duplicated operations and staffing due to the need to operate and maintain two separate facilities for the same purpose. The CRDF has a reduced capacity to provide GRR, EBI, and recreational programs when compared to the MLDC, and resources (e.g., classrooms, computer labs, video visitation areas, recreation areas, and programs) would have to be provided at separate locations, requiring more employees and resources. This inefficiency would result in increased operating costs to the County. Additionally, Alternative 4 would not allow for the use of AB 900 grant, which is site-specific.

Finding

The County finds that Alternative 4 is infeasible because it would not meet the majority of the Project objectives and it would not realize the benefits of Project implementation. The Project benefits that would not be obtained through Alternative 4 include, but are not limited to, (1) serving the qualifying eligible female inmate population; (2) fully providing the provision of GRR and EBI programs; (3) providing a culinary arts program; (4) providing efficient delivery of services/continuity of programs, with duplicated operations and staffing due to the need to operate

and maintain two separate facilities for the same purpose; (5) or maximizing the use of state grant funds from AB 900 and any other grant funds.

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

5.2.6 Alternative 5: Two Separate Women's Facilities (at Mira Loma Detention Center and Pitchess Detention Center South)

Alternative 5 proposes that two of the County's detention facilities would be reused to house qualifying low- to medium-security-level female inmates. This alternative assumes that approximately 1,040 female inmates would be housed at the MLDC site and up to 846 female inmates would be at PDC South.

PDC South is currently occupied by male inmates. As shown in Table 5-2 of the Draft EIR, PDC South has an 846-bed capacity; it was built in 1971 and is considered to be in "good" condition. PDC South is a barrack-style facility that is similar to the facilities at MLDC, and therefore, more appropriately suited for a female inmate population on a permanent basis. The male inmates currently housed within PDC South would be transferred to the CRDF, which is designed for male inmates and would have capacity once the female inmates were transferred to MLDC and PDC South.

Alternative 5 would allow for the accommodation of an increased qualifying female population of up to 1,886 beds when compared to the proposed MLWDC Project's capacity of 1,604 beds. Under this alternative, neither the MLDC site nor PDC South would require new building construction or expansion for additional day space to accommodate the female population, although there would not be adequate EBI, GRR, and recreational program space when compared to the proposed MLWDC Project.

Repairs that would be required to accommodate 1,040 female inmates at the MLDC site would be exactly the same as set forth in Alternative 4. As such, this Alternative would implement Alternative 4, but rather than having the remaining female population stay at CRDF and having that facility become a split male/female facility, the remaining eligible female population would be relocated to PDC South. Alternative 5 would duplicate certain operations and staffing due to the need to operate and maintain two separate facilities for the same purpose. Maintaining female inmate housing at both PDC and MLDC would require duplication of medical services spaces to provide the specific medical needs of the female inmate population.

Under Alternative 5, the following actions would be required:

- Repairs to MLDC (see description of Alternative 4)
- Repairs to PDC South (to accommodate the female inmate population)
- Relocation of male inmates to CRDF

The County Sheriff's Department has indicated that, because PDC South is currently occupied, it requires few physical improvements to serve the qualifying female population. Minor improvements to restroom facilities and the Inmate Processing Area would be required, but substantive renovations or repairs would be unnecessary. As with the MLDC property, some of the proposed GRR model programming could be accommodated within the existing facilities, requiring only minor renovation, but programming would be provided at a less comprehensive

level and some programs would not be instituted at all (e.g., the culinary arts program). PDC South contains 12 classrooms, which would allow approximately 260 inmates to participate in programming at one time, whereas the proposed MLWDC Project would provide almost twice as much classroom space.

Summary of Environmental Effects and Achievement of Project Objectives

The proposed Project would not result in any significant impacts after mitigation. Alternative 5 would result in a similar level of environmental impacts when compared to the proposed Project. Therefore, neither the proposed Project nor Alternative 5 would be considered environmentally superior when compared to the other, as summarized in Table 5-14 in Section 5.0, Alternatives, of the Draft EIR.

This inefficiency would result in increased operating costs to the County. Additionally, Alternative 5 would not allow for the use of AB 900 grant which is site-specific.

Finding

The County finds that Alternative 5 is infeasible because it would not be considered environmentally superior to the proposed Project. Alternative 5 would not meet the majority of the Project objectives, and it would not realize the benefits of Project implementation. The Project benefits that would not be obtained through Alternative 5 include, but are not limited to, (1) lacking renovation and expansion of the facilities to provide customized services as provided in the provision of GRR and EBI programs; (2) providing the culinary arts program; (3) providing efficient delivery of services/continuity of programs, with duplicated operations and staffing due to the need to operate and maintain two separate facilities for the same purpose; (4) decreased operating costs to the County; and (5) maximizing the use of state grant funds from AB 900 and any other grant funds.

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

6.0 FINDINGS ON RESPONSES TO COMMENTS ON THE DRAFT EIR AND REVISIONS IN THE FINAL EIR

The Responses to Comments (Section 2.0 of the Final EIR) includes the comments received during the public review period on the Draft EIR and the County's responses to these comments. The focus of the Responses to Comments is on the disposition of significant environmental issues as raised in the comments, as specified by State CEQA Guidelines Section 15088(c). The County provided a written proposed response to each public agency on comments made by that public agency, as set forth in Section 2.1 of the Final EIR, Response to Comments, Mitigation Monitoring and Reporting Program, and Revisions, Clarifications, and Corrections to the Draft EIR, pursuant to State CEQA Guidelines Section 15088(b).

The purpose of the Final EIR is to respond to all comments received by the County regarding the environmental information and analyses contained in the Draft EIR. Revisions, Clarifications, and Corrections on the Draft EIR (Section 4.0 of the Final EIR) includes any clarifications/corrections to the text, tables, figures, and appendices of the Draft EIR generated either from responses to comments or independently by the County. The County finds that comments made on the Draft EIR, the responses to these comments, and revisions to the Draft EIR clarify or update the

analysis presented in the document but do not change the analysis or conclusions of the Draft EIR. Accordingly, no significant new information, as described in State CEQA Guidelines Section 15088.5, was added to the EIR after the Draft EIR was made available for public review.

The comments, responses to comments, and the clarifications to the Draft EIR do not trigger the need to recirculate the EIR pursuant to State CEQA Guidelines Section 15088.5. These changes merely clarify or update the discussion but do not change the analysis or conclusions of the Draft EIR. Based on the analysis in the Draft EIR, the comments received, and the responses to these comments, no substantial new environmental issues have been raised that have not been adequately addressed in the Draft EIR. Also, no changes to the analysis or conclusions of the Draft EIR are necessary based on the comments, the responses to the comments, and the revisions to the Draft EIR that are listed above.

This page intentionally left blank

**COUNTY OF LOS ANGELES DEPARTMENT OF PUBLIC WORKS
CONSULTANT'S UTILIZATION PARTICIPATION FOR PROJECT MANAGEMENT/CONSTRUCTION MANAGEMENT FOR
MIRA LOMA WOMEN'S DETENTION CENTER PROJECT**

SELECTED FIRM

Consultant Name (only JV firms* with Utilization Participation are listed)	Local SBE	SBE	Minority	Women	Disadvantaged	DisabledVet
MIRA LOMA JOINT VENTURE*						
APSI Construction Management	X	X			X	
Casamar Group, LLC	X	X	X		X	X
NON-SELECTED FIRMS						
Consultant Name (only JV firms* with Utilization Participation are listed)	Local SBE	SBE	Minority	Women	Disadvantaged	DisabledVet
B.O.S.S						
BRJ & Associates	X	X				
O'Connor Construction Management, Inc.						X
Simplex Construction Management, Inc.			X		X	
HPFS3*						
Paragon Construction Consulting		X				
RWBID Construction Management						
Jenkins/Gales Martinez		X	X		X	
RWBID Construction Management	X	X				
STV*/M&M/ERJ/Yang						
ERJ Engineering Consultants		X	X		X	
McKissack and McKissack		X				
Yang Management			X	X		

**COUNTY OF LOS ANGELES DEPARTMENT OF PUBLIC WORKS
CONSULTANT'S UTILIZATION PARTICIPATION FOR DOCUMENT CONTROL, PROJECT CONTROL AND SUPPORT
SELECTED FIRM**

Consultant Name (only JV firms* with Utilization Participation are listed)	Local SBE	SBE	Minority	Women	Disadvantaged	DisabledVet
MIRA LOMA PROJECT CONTROLS, LLC*						
AIM Consulting Services	X	X	X		X	
TEC Management Consultants, LLC		X	X	X	X	
NON-SELECTED FIRM						
Consultant Name (only JV firms* with Utilization Participation are listed)	Local SBE	SBE	Minority	Women	Disadvantaged	DisabledVet
B.O.S.S						
BRJ & Associates	X	X				
O'Connor Construction Management, Inc.						X
Simplex Construction Management, Inc.			X		X	