



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.

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.

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.

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.

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?

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?

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.

### 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.

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.

## 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.<sup>1</sup> 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.

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.<sup>2</sup>

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.”

The report fails to consider frequent clinical misdiagnosis of coccidioidomycosis cases.<sup>3</sup> How will the project ensure proper diagnosis and treatment of Valley Fever?

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<sup>1</sup> <http://journals.plos.org/plosone/article?id=10.1371/journal.pone.0136753>

<sup>2</sup> <http://www.motherjones.com/environment/2015/01/valley-fever-california-central-valley-prison>

<sup>3</sup> <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?

“Air quality plan” is vague. Please provide examples of potential air quality standard plans.

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.

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.

What are the potential impacts of increased pollutants on the health of prisoners? What mitigation measures will be provided during outdoor recreation?

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?

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?

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.

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.

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?

#### **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.

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.

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.

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.

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?

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.

## **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.

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?

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?

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?

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.

## **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.

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.

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?

Report states that construction will begin in November 2016. In other pages, December 2016 is the projected start date for construction.

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.

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.

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.

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.

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.

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.

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.

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).

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.

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.

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.

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.

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.

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.



Regarding asbestos and lead sampling, the report must justify why Building 27-29 were not sampled.

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.

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.

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.

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.

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.

What are the hazardous implications of the two hydraulic hoists observed in the vehicle service garage?

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.

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.

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?

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

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.

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.

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.

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.

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.

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.

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.

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.

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.

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.

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.

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.

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.

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.

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.

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.

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.

#### 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)?

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?

The historic well production statistics are outdated. The intensification of drought conditions in recent years (post 2012) warrants an updated study.

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?

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?

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?

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?

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.

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?

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.

What is the estimated cost of developing a new on-site storm drain system?

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.

#### **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?

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?

#### **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.”

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.

It is not indicated whether the full-sized sports court for volleyball and basketball is outdoor or indoor.

#### **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.

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

frequency of bus routes from LA to Lancaster, nor does the project propose additional bus stops or routes near the project site.

There is only one bicycle lane on one road near the project site. There are no proposed bikeways to facilitate transportation to the site.

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.

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.