



South Coast Air Quality Management District

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SENT VIA E-MAIL AND USPS:

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Attn: CCTF EIR

Los Angeles County Chief Executive Office

Capital Projects/Debt Management

500 W. Temple Street, Room 754

Los Angeles, CA 90012

December 12, 2017

Draft Environmental Impact Report (EIR) for the Proposed Los Angeles County Consolidated Correctional Treatment Facility (CCTF) (Men's Central Jail Replacement Project)

The South Coast Air Quality Management District (SCAQMD) staff appreciates the opportunity to comment on the above-mentioned document. The following comments are meant as guidance for the Lead Agency and should be incorporated into the Final EIR.

SCAQMD Staff's Summary of Project Description

The Lead Agency proposes to demolish the existing 1.4 million-square-foot Men's Central Jail facility and construct an up to 2.4 million-square-foot CCTF (Proposed Project). In addition to the development of the Proposed Project, construction of off-site parking facilities at one of two locations may be included. The Proposed Project is surrounded by railroad and a manufacturing and recycling center to the north, Metro maintenance and repair facility to the east, Twin Towers Correctional Facility, bail bonds services, and a rail yard to the south, and railroad and commercial facilities to the west. Based on a review of aerial photographs, SCAQMD staff found that the Proposed Project would be located adjacent to Metrolink passenger rail. Construction is expected to take approximately nine years and completed by 2027.

SCAQMD Staff's Summary of Air Quality Analysis

In the Air Quality Analysis Section, the Lead Agency quantified the Proposed Project's construction and operation emissions and compared them to SCAQMD's regional and localized air quality CEQA significance thresholds¹. The Lead Agency found that the Proposed Project's air quality impacts would be reduced to less than significant after incorporating Mitigation Measure (MM) MM AIR-1 through MM AIR-5².

Health Risk Assessment from Sources of Air Pollution

Notwithstanding the court rulings, SCAQMD staff recognizes that the Lead Agencies that approve CEQA documents retain the authority to include any additional information they deem relevant to assessing and mitigating the environmental impacts of a project. SCAQMD staff also recognizes that a discussion of Health Risk Thresholds was included in the Air Quality Analysis Section.³ Because of SCAQMD's concern about the potential public health impacts of siting the Proposed Project adjacent to an active rail track, SCAQMD staff recommends that, prior to approving the Proposed Project, the Lead Agency consider the impacts of air pollutants on people who will live (or serve their sentence) and work at the Proposed project and provide mitigation where necessary.

Based on a review of the Draft EIR, SCAQMD staff found that the Proposed Project is located adjacent to Metrolink rail tracks, which serves as substantial evidence to support a disclosure of potential health

¹ Draft EIR. Chapter 5.0, *Air Quality*. Page 5.2-15.

² Draft EIR. Chapter 5.0, *Air Quality*. Pages 5.2-42 to 47.

³ Draft EIR. Chapter 5.0, *Air Quality*. Page 5.2-19.

impacts in the Final EIR⁴. Additionally, based on a review of aerial photographs, SCAQMD staff found that the Proposed Project is located approximately 500 feet from Union Station Metrolink platform facilities. Diesel particulate matter emitted from diesel powered engines (such as from trucks, buses, and trains) has been classified as a toxic air contaminant and a carcinogen. Since people living (or serving their sentence) and working at the Proposed Project would likely be exposed to toxic emissions from these nearby sources of air pollution, SCAQMD staff recommends that the Lead Agency conduct a Health Risk Assessment (HRA) for the Proposed Project's overlapping construction and operations phase, and operations to disclose the potential health risks in the Final EIR.⁵

Pursuant to California Public Resources Code Section 21092.5 and CEQA Guidelines Section 15088, SCAQMD staff requests that the Lead Agency provide the SCAQMD with written responses to all comments contained herein prior to the certification of the Final EIR.

SCAQMD staff is available to work with the Lead Agency to address any air quality questions that may arise from this comment letter. Please contact Ryan Bañuelos, Air Quality Specialist, CEQA Section, at (909) 396-3479, if you have any questions.

Sincerely,

Lijin Sun

Lijin Sun, J.D.

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

LS:RB

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Control Number

⁴ South Coast Air Quality Management District. "Health Risk Assessment Guidance for Analyzing Cancer Risk from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis". Accessed at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mobile-source-toxics-analysis>.

⁵ SCAQMD has developed the CEQA significance threshold of 10 in one million for cancer risk. When SCAQMD acts as the Lead Agency, SCAQMD staff conducts a HRA, compares the maximum cancer risk to the threshold of 10 in one million to determine the level of significance for health risk impacts, and identifies mitigation measures if the risk is found to be significant.