

APPENDIX H

Public Service Correspondence



December 1, 2022

Ref. DOC 6769698

Ms. Valerie Flores
VCS Environmental
30900 Rancho Viejo Road, Suite 100
San Juan Capistrano, CA 92675

Dear Ms. Flores:

Comment Letter for Patriot Business Park

The Los Angeles County Sanitation Districts (Districts) received the letter and plans for the subject project on November 28, 2022. The proposed project is located within the jurisdictional boundaries of District No. 20. We offer the following comments regarding sewerage service:

1. The flow originating from the proposed project would have to be transported to the Districts' trunk sewer by local sewer(s) that are not maintained by the Districts. If no local sewer lines currently exist, it is the responsibility of the developer to convey any wastewater generated by the project to the nearest local sewer and/or Districts' trunk sewer. The nearest Districts' trunk sewer is the Trunk "B" Trunk Sewer, located in Blackbird Lane at 10th Street East. The Districts' 21-inch diameter trunk sewer has a capacity of 3.3 million gallons per day (mgd) and conveyed a peak flow of 0.4 mgd when last measured in 2020.
2. The wastewater generated by the proposed project will be treated at the Palmdale Water Reclamation Plant, which has a capacity of 12 mgd and currently processes an average recycled flow of 8.3 mgd.
3. The expected average wastewater flow from the project, described in the letter as 300,292 square feet of industrial buildings, is 7,507 gallons per day. For a copy of the District's average wastewater generation factors, go to www.lacsd.org, under Services, then Wastewater Program and Permits and select Will Serve Program, and click on the [Table 1, Loadings for Each Class of Land Use](#) link.
4. The Districts are empowered by the California Health and Safety Code to charge a fee to connect facilities (directly or indirectly) to the Districts' Sewerage System or to increase the strength or quantity of wastewater discharged from connected facilities. This connection fee is used by the Districts for its capital facilities. Payment of a connection fee may be required before this project is permitted to discharge to the Districts' Sewerage System. For more information and a copy of the Connection Fee Information Sheet, go to www.lacsd.org, under Services, then Wastewater (Sewage) and select Rates & Fees. In determining the impact to the Sewerage System and applicable connection fees, the Districts will determine the user category (e.g. Condominium, Single Family Home, etc.) that best represents the actual or anticipated use of the parcel(s) or facilities on the parcel(s) in the development. For more specific information regarding the connection fee application procedure and fees, the developer should contact the Districts' Wastewater Fee Public Counter at (562) 908-4288, extension 2727.
5. In order for the Districts to conform to the requirements of the Federal Clean Air Act (CAA), the 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 CAA. 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 the developer that the Districts intend to provide this service up to the levels that are legally permitted and to inform the developer of the currently existing capacity and any proposed expansion of the Districts' facilities.

If you have any questions, please contact the undersigned at (562) 908-4288, extension 2743, or mandyhuffman@lacsdsd.org.

Very truly yours,



Mandy Huffman
Environmental Planner
Facilities Planning Department

MNH:mnh



OFFICE OF THE SHERIFF

COUNTY OF LOS ANGELES

HALL OF JUSTICE

ROBERT G. LUNA, SHERIFF



March 8, 2023

Ms. Valerie Flores, Planner/Project Coordinator
VCS Environmental
30900 Rancho Viejo Road, Suite 100
San Juan Capistrano, California 92675

Dear Ms. Flores:

**PATRIOT BUSINESS PARK DEVELOPMENT PROJECT
REQUEST FOR SHERIFF'S DEPARTMENT SERVICE INFORMATION
PREPARATION OF CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA)
INITIAL STUDY (IS)**

Thank you for inviting the Los Angeles County Sheriff's Department (Department) to provide information and responses to specific questions to be addressed for Patriot Business Park Development Project (Project) in preparation for California Environmental Quality Act (CEQA) Initial Study (IS). The Project proposes to develop four industrial buildings approximately 300,400 square feet along with a water quality detention basin and parking areas. The proposed Project is located on approximately 20.43 acres consist of four vacant parcels know as Lot 3, Lot 12, Lot 16, and Lot 20 in the City of Palmdale.

The proposed Project is located within the service area of the Department's Palmdale Sheriff's Station (Station). Due to cumulative impacts, the proposed Project will impact the current level of service provided by the Station for the potential increase in employees and daytime population proposed by the Project. In addition, the Project Applicant will be required to pay all required law enforcement mitigation fees and City developer fees associated with the project. Additional resources to address the needs of the development will need to be reviewed by the City of Palmdale and our Contract Law Enforcement Bureau in coordination with our Station. Accordingly, the Station reviewed the CEQA Initial Study questionnaire and authored the attached review

211 WEST TEMPLE STREET, LOS ANGELES, CALIFORNIA 90012

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Ms. Flores

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March 8, 2023

comments (see correspondence dated March 6, 2023, from Captain Ronald Shaffer).

For future reference, the Department provides the following updated address and contact information for all requests for reviews comments, law documents, and other related correspondence:

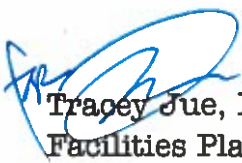
Tracey Jue, Director
Facilities Planning Bureau
Los Angeles County Sheriff's Department
211 West Temple Street
Los Angeles, California 90012

Attention: Planning Section

Should you have any questions regarding this matter, please contact me, at (323) 526-5657, or your staff may contact Mr. Immanuel Chiang, of my staff, at (323) 526-5637.

Sincerely,

ROBERT G. LUNA, SHERIFF



Tracey Jue, Director
Facilities Planning Bureau

COUNTY OF LOS ANGELES
SHERIFF'S DEPARTMENT
"A Tradition of Service Since 1850"

DATE: March 6, 2023

FILE NO:

OFFICE CORRESPONDENCE


FROM: RONALD T. SMAFFER, CAPTAIN TO: TRACEY JUE, DIRECTOR
PALMDALE STATION FACILITIES PLANNING BUREAU

SUBJECT: RESPONSE TO REQUEST FOR SHERIFF'S DEPARTMENT SERVICE INFORMATION FOR THE PROPOSED PATRIOT BUSINESS PARK DEVELOPMENT PROJECT

The Palmdale Sheriff's Station (Station) is providing the following information as a response to a request received from VCS Environmental, a company who is currently preparing Patriot Business Park Development Project (Project) California Environmental Quality Act (CEQA) Initial Study (IS). The Project proposes to develop four industrial buildings along with water quality detention basin and parking areas located on four vacant parcels of land, on Lot 3, Lot 12, Lot 16, and Lot 20 in the City of Palmdale (City). The project proposes two 50,000 square foot (sf) industrial buildings with 185 parking spaces, a 100,152 sf industrial building with 139 parking spaces on Lot 12, a 1.38-acre water quality detention basin on Lot 16, and a 100,140 sf industrial building on Lot 20. The total building area for the proposed project is approximately 300,392 sf with a maximum building height of 35 feet. In addition, 511 parking spaces are proposed on both Lot 16 and Lot 20.

The questionnaire below is formatted to correspond with the format of the Request:

1. ***Does your agency have an established target response time? What is the current actual response time to the project area?***

The Department generally adheres to the following widely accepted industry standard among law enforcement agencies for responses categorized as emergent, priority, and routine calls for service: 10 minutes, 20 minutes, and 60 minutes, respectively.

The proposed Project is approximately 1.7 miles from the Station servicing the project area, located at 750 E Avenue Q in Palmdale. Per Fiscal Year 2021-2022, the Station's average, or

anticipated response times for emergent, priority, and routine calls for service received from the proposed Project are 5.38, 21.44, and 139 minutes, respectively. (Please note these are approximate time ranges only and could be affected by traffic conditions and these response times are variable because the responding unit may be elsewhere within the Station's service area and not necessarily dispatched from the Station itself.)

2. Does your agency have an established target staffing level (i.e., personnel/population)?

The Department does not currently have a standard law enforcement service ratio because staffing level needs vary from Station to Station due to criteria such as service call volume and type, patrol and travel time by priority, personnel workload, performance levels, and modeling the flow of calls for service ratio.

3. Are current staff levels and facilities adequate or deficient?

The Station is currently understaffed. Assigning additional personnel to the Station to meet an acceptable service ratio will intensify the current shortage of facility space and supporting equipment. Any expansion of the Station, or construction of new facilities, should not only account for any current shortage, but should also accommodate additional personnel and equipment that will become necessary as our service area continues to experience growth and intensification of land uses.

4. Do you anticipate any significant impacts associated with the proposed project on current service within the City, such as increasing service calls or the need for additional personnel or patrol cars? Please provide generation factors if it is determined that additional personnel or patrol cars are required.

The proposed Project will increase employees and daytime population of the Station's service area, which will generate an increased demand for law enforcement services. The Station expects the Draft EIR to quantify the population increases, describe potential impacts to our resources and operations, and identify measures that will mitigate these impacts to a level of insignificance.

See item #2 response.

- 5. Do you anticipate that implementation of the proposed project would result in the need for physical additions to your agency (i.e., construction of new police stations)?**

Currently, the Department has no plans for expansion of the Station or construction of new facilities. However, with cumulative growth impacts from various developments in the area, a facility expansion may be required.

- 6. Please indicate any assessment fees required for new developments.**

See item #8 response.

- 7. Do you anticipate that compliance with Law Enforcement Code requirements and payment of required fees and taxes provided by new developments associated with the proposed project will adequately mitigate the expected increase in police demand? If not do you have any required or recommended mitigation measures to reduce impacts to less than significant.**

It is recommended that the Project Applicant be required to pay law enforcement mitigation fees or City developer fees associated with the impacts imposed by the proposed Project. Additional resources to address the needs of the development will need to be reviewed by the City of Palmdale and our Contract Law Enforcement Bureau in coordination with our Station.

The Department recommends that the general principles of Crime Prevention Thru Environmental Design (CPTED) be implemented during the Project design phase. The goal of CPTED is to reduce opportunities for criminal activities by employing physical design features that discourage anti-social behavior, while encouraging the legitimate use of the site. The overall tenets of CPTED include defensible space, territoriality, surveillance, lighting, landscaping, and physical security.

The Station recommends that an analysis and impacts of the proposed Project to the local transportation and circulation system

also be included in the EIR. Traffic levels at intersections must be identified, studied, and analyzed. Preparation of a Construction Mitigation Plan would also help in reducing impacts to traffic levels. A Construction Traffic Management Plan should also be implemented as part of the proposed Project to address construction-related traffic congestion and emergency access issues. If temporary lane closures are necessary for the installation of utilities, emergency access should be maintained at all times. Flag persons and/or detours should also be provided as needed to ensure safe traffic operations, and construction signs should be posted to advise motorists of reduced construction zone speed limits.

8. Are there any plans for additional sheriff officers or facility expansion or new facilities, please provide as much detail as possible. Where does your agency acquire funding for new facilities?

Currently, the Department has no plans for expansion of the Station or construction of new facilities.

Operational funding for the Department serving the Project comes from various types of tax revenue but it is not guaranteed. Annual evaluations are conducted, and funding would need to be allocated to the Department and approved by the BOS based upon recommendations by the CEO. The Project area will directly increase population growth and it is recommended the City evaluate each development and identify funding for facilities, personnel and/or associated operational equipment required to mitigate the impacts and discuss with LASD's Contract Law Enforcement Bureau to determine the needs.

The primary resources of funding for LASD operations and improvements are through contracts with the City of Palmdale and the County of Los Angeles. The Project Applicant will be required to pay all law enforcement mitigation services fees or City required developer fees associated with the proposed Project. These fees will help the Station to acquire additional law enforcement service personnel and equipment to conduct patrol operations for this Project and all the other developments that were recently approved in the Station's service area.

9. Please include any additional information you feel is pertinent to the analysis for the proposed project.

At this time, the Station has no further comments on the proposed Project. However, the Station reserves the right to amend or supplement our assessment upon subsequent reviews of the proposed Project once additional information becomes available.

Thank you for including the Station in the environmental review process for the proposed Project. Should you have any questions regarding this matter, please contact Immanuel Chiang, with Facilities Planning Bureau at (323) 526-5637.

RTS:MKB:mb

