Addendum to the Environmental Impact Report for the Town of Apple Valley 2009 General Plan and Annexations 2008-001 and 2008-002

(State Clearinghouse No. 2008091077)

for the Watson High Desert Logistics Project (East and West Sites)

Prepared for:

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I. INTRODUCTION AND PROJECT BACKGROUND

A. Summary

This document is an Addendum to the Town of Apple Valley's 2009 General Plan and Annexations 2008-01 and 2008-02 Environmental Impact Report (herein "2009 EIR"). This Addendum has been prepared to evaluate the potential environmental impacts of the proposed Watson High Desert Logistics Project ("Project"), which includes development of three industrial warehouse buildings totaling 3,729,100 square feet (sf) on two non-contiguous parcels totaling approximately 200 acres, as follows:

- Watson High Desert Logistics - West (herein "West Project site"): one 896,500 sf industrial warehouse building on 47.7 acres; and

- Watson High Desert Logistics – East (herein "East Project site"): two industrial warehouse buildings totaling 2,832,600 sf on 152.5 acres, consisting of Building 1 (1,631,800 sf) and Building 2 (1,200,800 sf).

In accordance with the California Environmental Quality Act (CEQA), this Addendum analyzes the proposed Project's environmental impacts and whether the proposed Project would result in new or substantially more significant environmental impacts compared to the impacts described in the certified 2009 EIR. As demonstrated herein, all potential environmental impacts associated with the Project at buildout are within the envelope of impacts already evaluated in the certified 2009 EIR.

In this document, Section I provides a summary of the Project, background, location, and existing and surrounding land uses. Section II describes the proposed Project and all components of the Project, including requested actions. Section III describes the purpose of an Addendum and the findings. Section IV describes the potential environmental impacts of the proposed Project in the context of the 2009 EIR.

B. Project Background

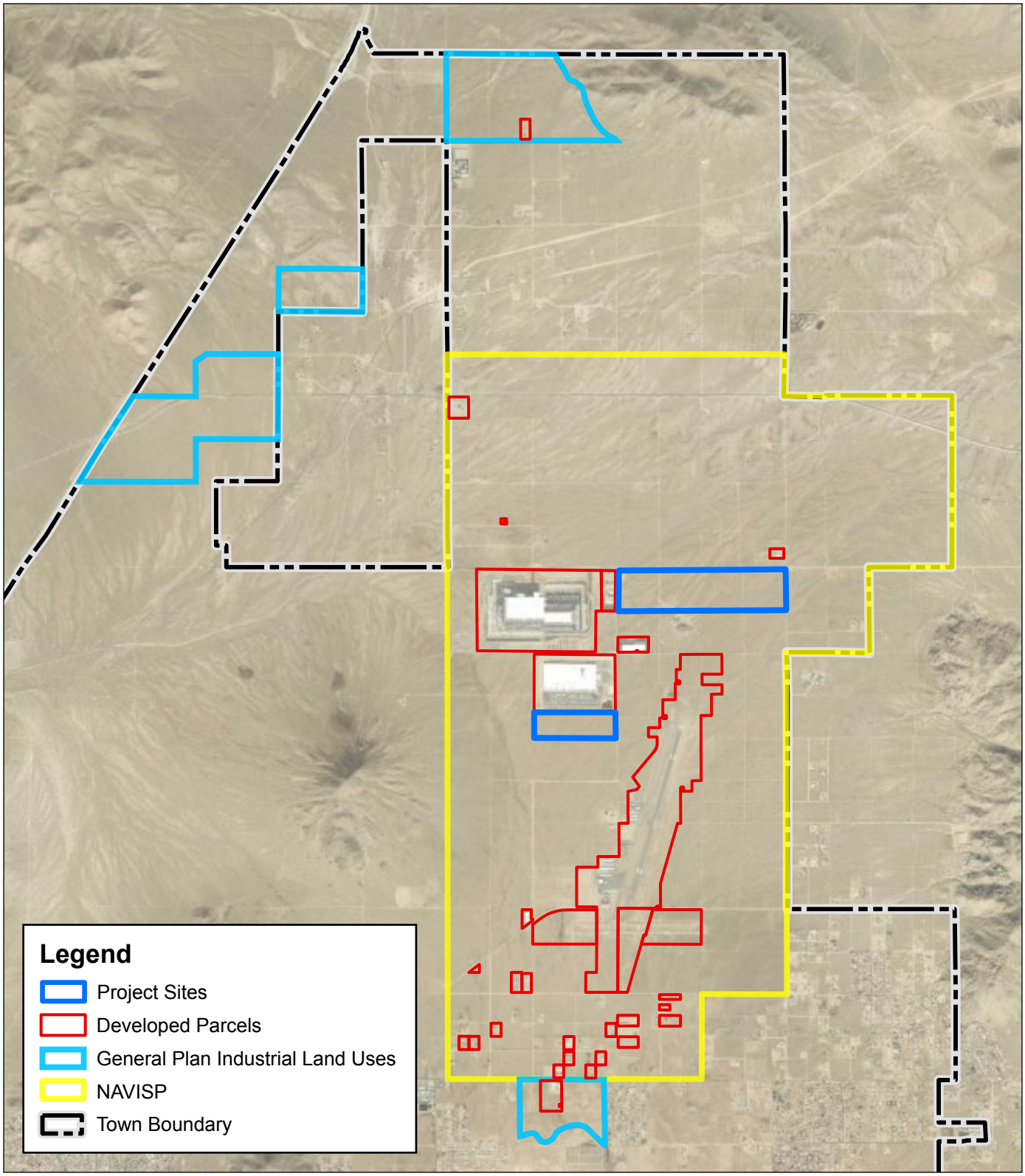
On October 10, 2006, the Town of Apple Valley (herein "the Town") approved the North Apple Valley Industrial Specific Plan (NAVISP) and certified an associated EIR (SCH No. 2006031112). The NAVISP was prepared to establish long-term development goals, standards and guidelines for 6,220± acres of land including and surrounding the Apple Valley Airport. The primary land uses envisioned in the NAVISP are industrial and commercial land uses, which would provide the Town with long-term economic growth and vitality, job growth and revenue. The Project sites are located within the NAVISP and are designated Industrial – Specific Plan (I-SP).

Subsequently, on April 27, 2010, the Town certified the Apple Valley 2009 General Plan EIR, SCH No. 2008091077 ("2009 EIR") and approved the Apple Valley 2009 General Plan ("General Plan"), encompassing 46,948.3± acres of land within the Town's corporate limits, including the NAVISP area, as well as 3,579.7± acres of land within the Town's Sphere of Influence that were proposed for annexation. The 2009 EIR disclosed and analyzed all potential impacts on the environment pursuant to CEQA due to buildout of the 2009 General Plan, including the buildout of the NAVISP. The Project sites are designated Specific Plan (SP) in the Town's General Plan.

The Apple Valley 2009 General Plan and its 2009 EIR included lands within Town limits and within two potential annexation areas: Annexation Area 1 was located in the northwest corner of Town, and Annexation Area 2 was south of Quarry Road, east of Town limits. Following adoption of the General Plan, the Town proceeded with the annexations. Annexation Area 2 was completed. Annexation Area 1 was not completed, but a portion of Annexation Area 1 was successfully annexed in 2019/2020. It is noted that neither Project site is located within an Annexation Area.

The General Plan assigned industrial land use designations, I-P and NAVISP, only in the North Apple Valley area, as shown in Figure 1, *General Plan I-P and NAVISP Lands*. Within Town limits, there were 645.3 acres designated I-P and 4,855.8 acres designated NAVISP. In addition, Annexation Area 1 contained 812.1 acres of I-P designated lands, and Annexation Area 2 contained 801 acres of I-P designated lands. Only limited development had occurred, and it was estimated that there was approximately 3.1 million square feet of developed industrial space in the Town.[1]

[1] See Table III-36 of the 2009 General Plan EIR.



Source(s): ESRI, NearMap Imagery (2023), Town of Apple Valley (2023)

Figure 1

0 1,375 2,750 5,500
Feet

General Plan I-P and NAVISP Lands

After completion of the General Plan, the Town amended the NAVISP to include all of the 801 acres of land in Annexation Area 2, as well as the I-P designated land north of Quarry Road, west of Central Road, and east of Dale Evans Parkway, thereby decreasing the I-P designated lands within the Town. The Town also annexed a portion of Annexation Area 1, thereby increasing the I-P designated lands within the Town. Currently there are 737.3 acres of I-P designated land within the Town, and 6,220 acres of land designated NAVISP (see Figure 1).

In order to analyze whether the impacts associated with buildout of the General Plan remained consistent under current conditions, the analysis consisted of two parts. First, General Plan baseline conditions were calculated. Then, current conditions were calculated, including existing development and projects under review or approved by the Town within the I-P and NAVISP boundaries. Existing, proposed, and development potential for development in I-P and NAVISP designated lands, were based on the following assumptions:

1. The existing development was based on actual square footage.

2. Development potential for known proposed projects was calculated based on proposed square footage.

3. Development potential for vacant land with no current proposed project was calculated at 22 percent building coverage, consistent with the 2009 General Plan EIR assumptions.

Existing development and current projects under review or approved by the Town within the I-P and NAVISP boundaries were added to the General Plan baseline condition.

As discussed in the 2009 EIR and shown in Table 1, *Buildout Assumptions*, when taking into account the existing developed industrial square footage since the adoption of the General Plan and cumulative industrial projects within the Town, there is a total of approximately 29,336,149 sf remaining for land designated as Industrial (I-P and NAVISP lands) under the General Plan.

Table 1 Buildout Assumptions

	Square Footage
General Plan Buildout for Industrial Land Uses	61,081,400[1]
2024 Current Conditions (Buildout)	57,960,331[2]
Existing Developed Square Footage since Adoption of the General Plan	2,896,419[3]
Cumulative Project Totals	25,727,763[4]
Remaining	**29,336,149[5]**

[1] Represents the square footage for industrial uses assumed by the 2009 GP EIR, which was based on GIS calculations.

[2] Represents General Plan buildout as of 2024 current conditions, which is slightly less than what was approved/analyzed under the 2009 GP EIR. Source: Table 1 of the Cumulative Trip Generation Assessment (Addendum *Appendix J1*).

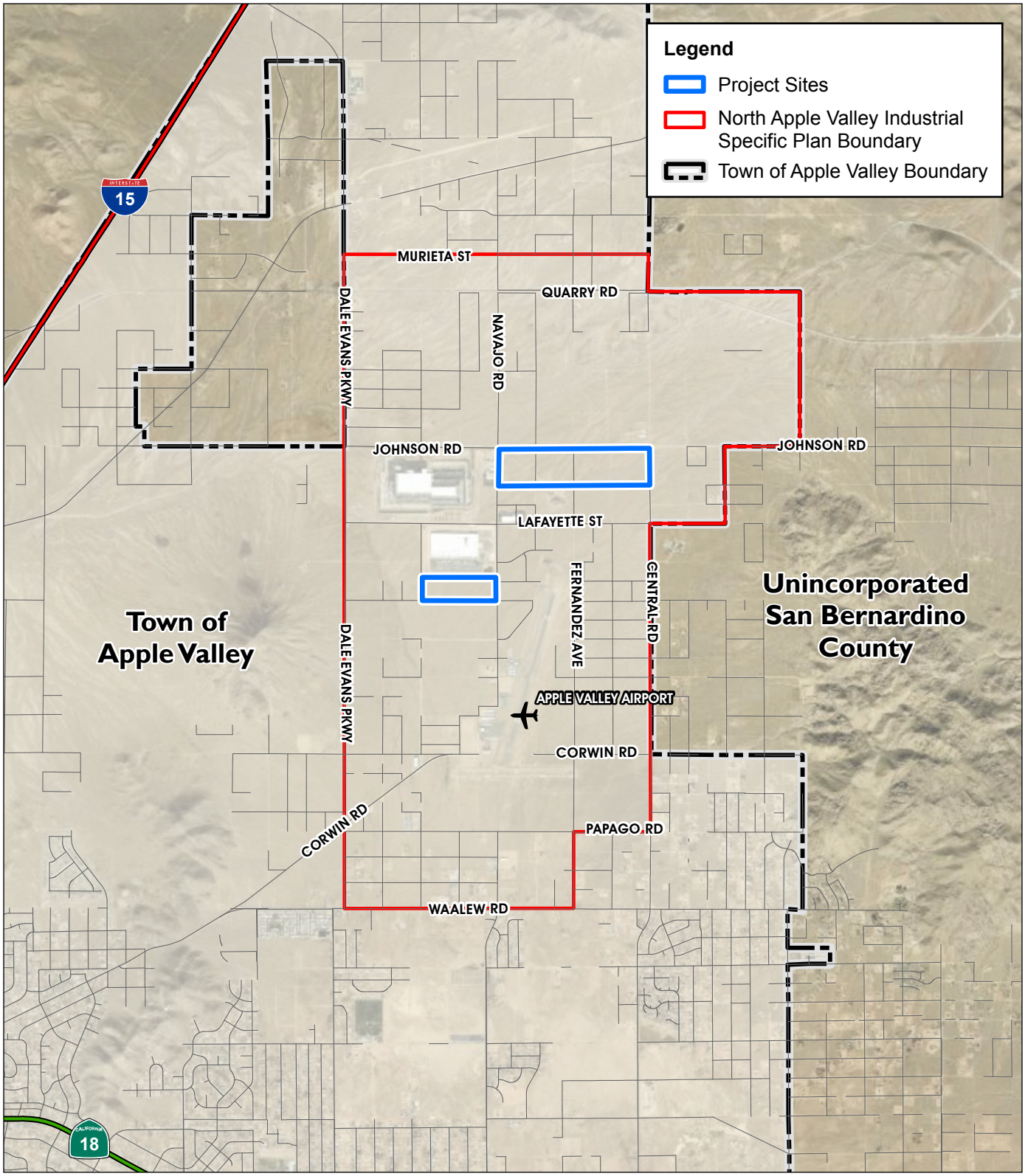
[3] Source: Table 1 of the Terra Nova Planning & Research, Inc., The Development at Cordova, Addendum to the Apple Valley General Plan and Annexations 2008-001 & 2008-002 Environmental Impact Report (SCH No. 2008091077), April 2024.

[4] Represents projects that are currently proposed in the vicinity of the Watson High Desert Logistics Project. Source: Table 4-4 of the Project Traffic Analysis (Addendum *Appendix J2*) It is noted this total is conservative since some of these projects may also be included within the "2024 Current Conditions (Buildout)" total.

[5] Represents remaining square footage, calculated as follows: General Plan Buildout 2024 Conditions (57,960,331) minus Existing (2,896,419) and Cumulative Development (25,727,763).

C. Project Location

The Project consists of two non-contiguous parcels (referred to as the East Project site and West Project site) encompassing a total of 200± acres (collectively referred to as Project sites) located in the northwest portion of the current Town limits. Both parcels are within the NAVISP. The East Project site consists of approximately 152 acres and is bounded by Johnson Road to the north, Central Road to the east, Kensington Street to the south, and Navajo Road to the west. The West Project site consists of approximately 48 acres and is bounded by an existing Big Lots Distribution Center to the north, Navajo Road to the east, Los Padres Road to the south, and Dachshund Avenue to the west. The regional location and project vicinity maps are provided in Figure 2, *Regional Location*, and Figure 3, *Project Vicinity*.

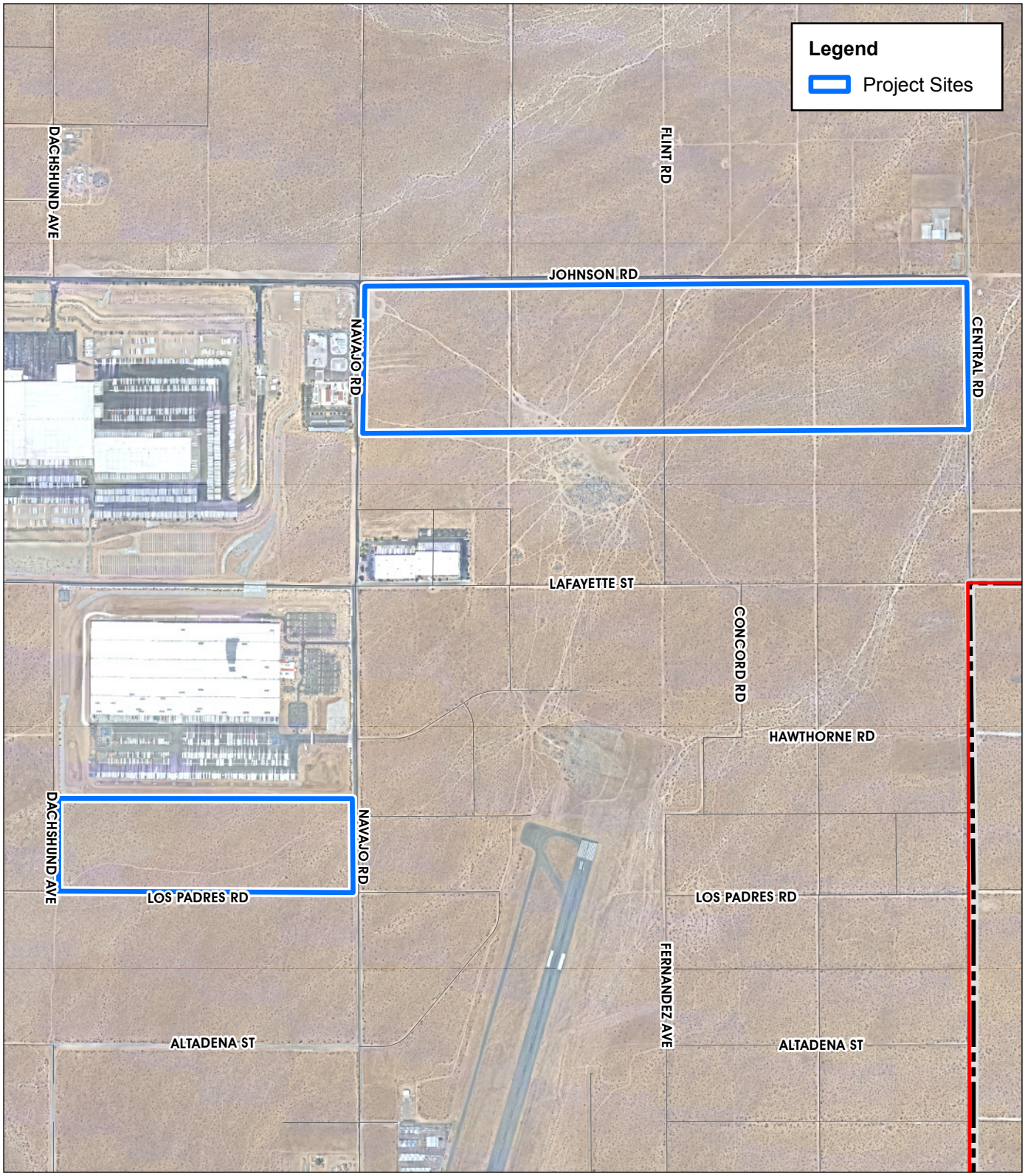


Source(s): ESRI, SB County (2023)

Figure 2

0 1,500 3,000 6,000
Feet

Regional Location



Source(s): ESRI, NearMap Imagery (July 2023), SB County (2023)

Figure 3

Project Vicinity

D. Existing and Surrounding Uses

Existing Land Uses

The Project sites are currently vacant, and contain native and non-native vegetation including *Larrea tridentata* Shrubland Alliance (Creosote Bush Scrub), which is dominated by creosote bush (*Larrea tridentata*) in the shrub canopy, with cheese bush (*Ambrosia salsola*), white bur-sage (*Ambrosia dumosa*), western Joshua tree, and desert Nevada ephedra (*Ephedra nevadensis*) also present. The Project sites also contain disturbed areas including roads, and non-sanctioned off-road vehicle trails and semi-truck parking. Figure 4, *Existing Conditions*, illustrates the existing conditions at the Project sites. Figure 5, *General Plan Land Use Map*, and Figure 6, *NAVISP Land Use Map*, shows the Project's General Plan and zoning designations, as described below.

Existing General Plan

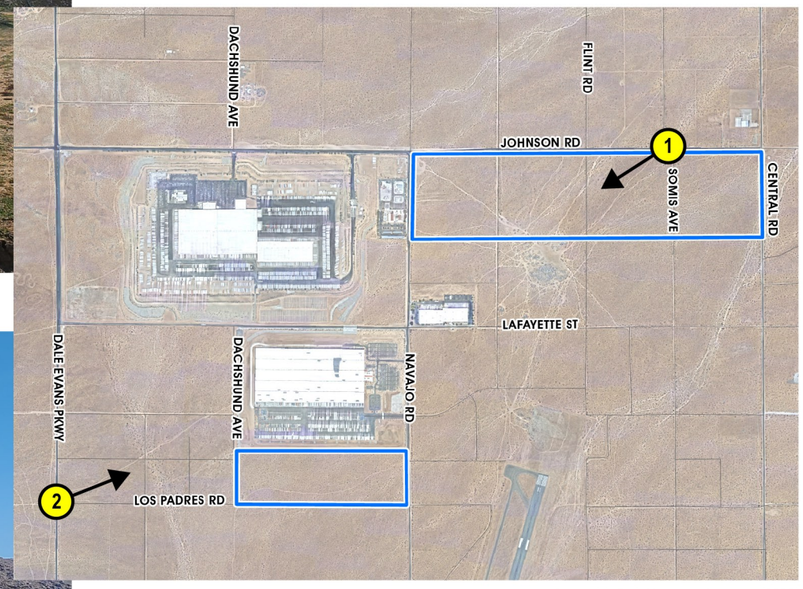
The Project sites are designated Specific Plan (SP). This designation is applied to lands on which a specific plan has been approved by the Town Council. The Specific Plan must conform to State law and include maps and text that establish the land use designations; standards and guidelines for development; infrastructure requirements; and phasing for the specific plan area.

Existing Zoning

The Project sites are designated (SP) Specific Plan on the Town's Zoning Map and are within the NAVISP. The Project sites are designated as Industrial – Specific Plan (I-SP) by the NAVISP. This designation allows for a broad range of clean manufacturing and warehousing uses, ranging from furniture manufacturing to warehouse distribution facilities. All uses must be conducted within enclosed buildings. Outdoor storage must be completely screened from view. Appropriate land uses in this designation include manufacturing facilities with showrooms and offices, regional warehousing facilities, and support services for manufacturing and warehousing. This designation is the most prevalent in the NAVISP having been assigned to 4,788.5 acres of land.

Site Photo 1: Northeast corner of the East Project Site, at the intersection of Johnson Rd and Somis Ave, looking southwest.

Site Photo 2: West of the West Project Site, at the intersection of Dale Evans Pkwy and Los Padres Rd, looking northeast.

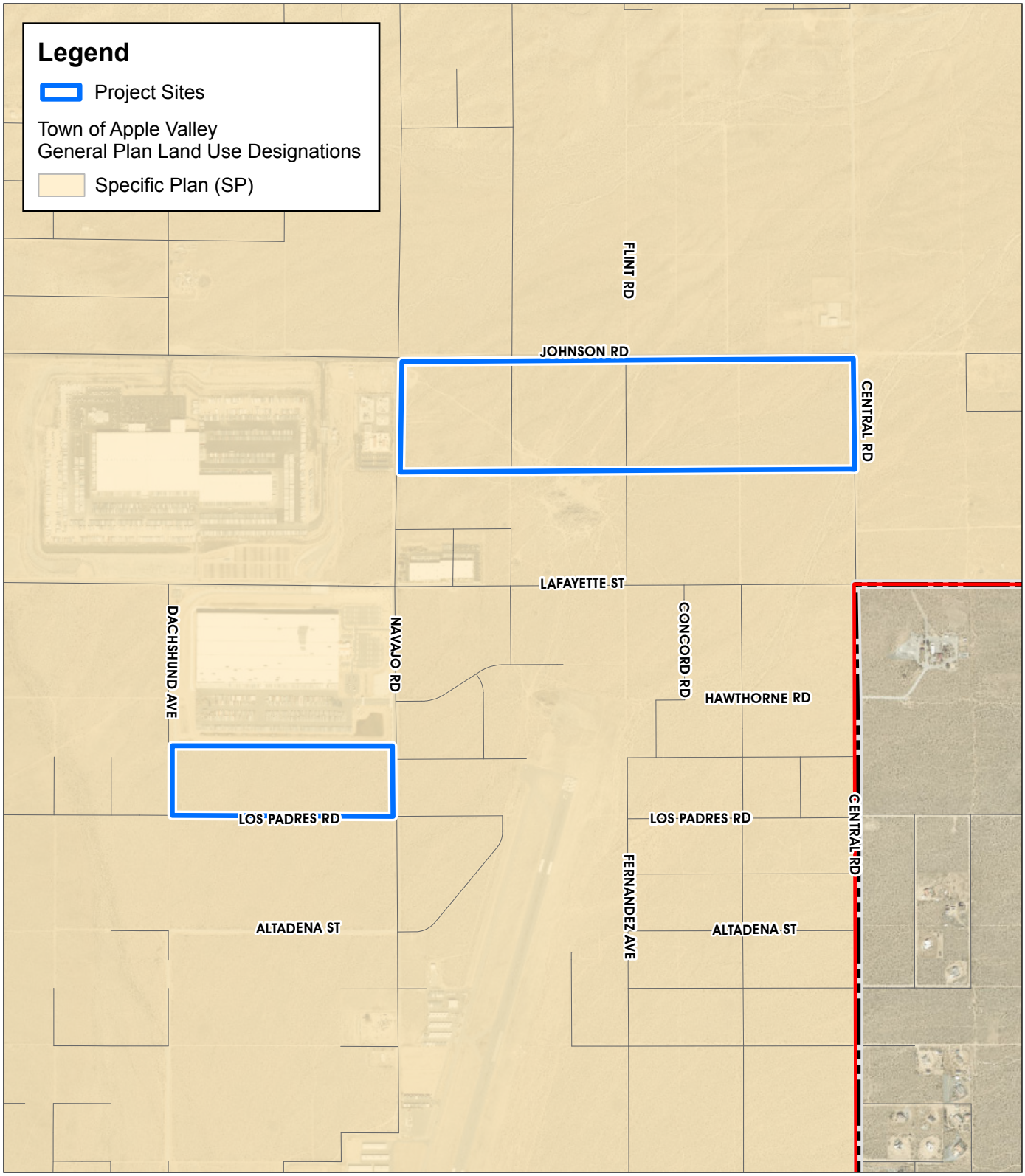


Source(s): Esri, Nearmap Imagery (2023)

Figure 4

Not to Scale

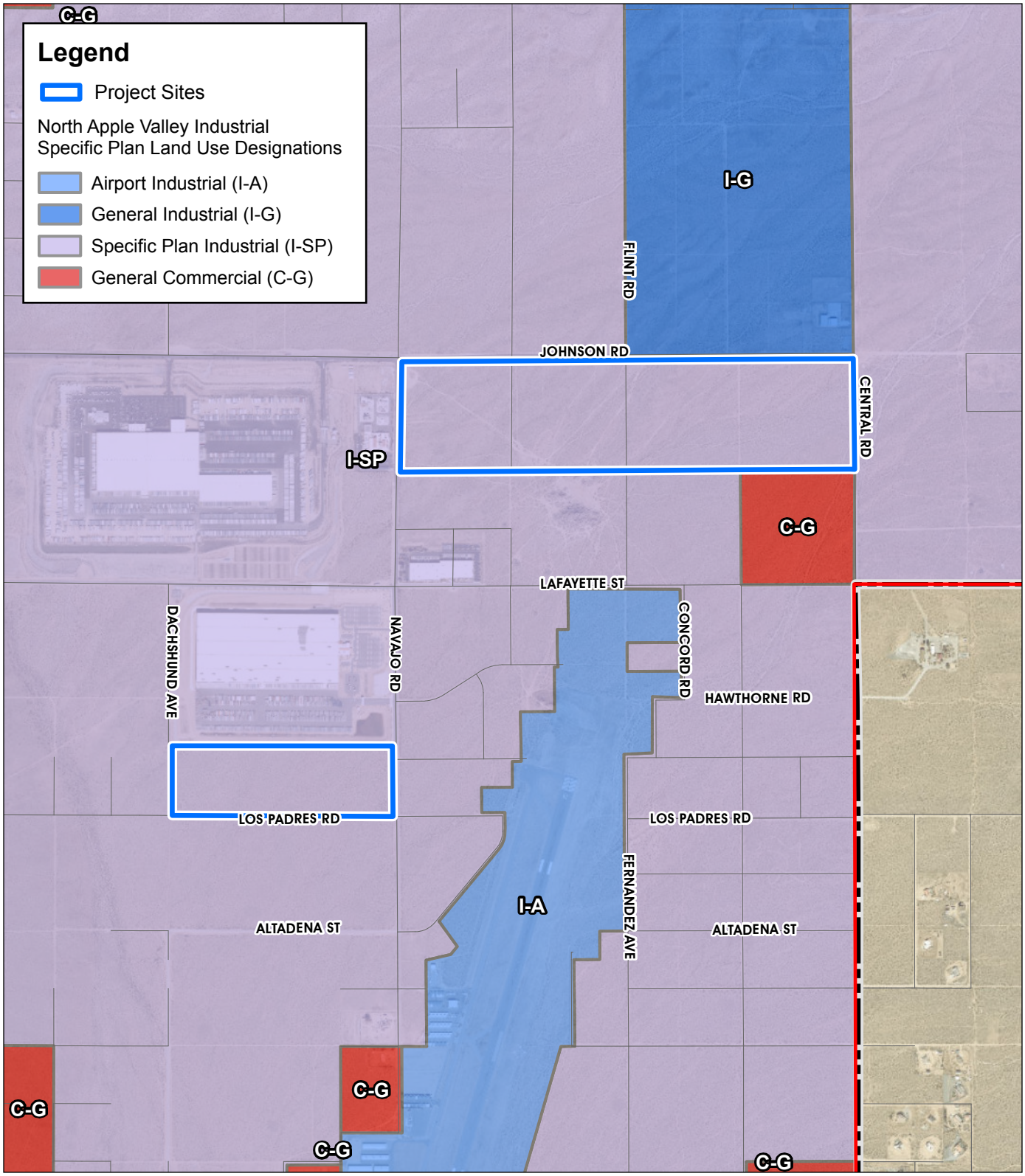
Existing Conditions



Source(s): ESRI, NearMap Imagery (2023), Town of Apple Valley (2023)

Figure 5

General Plan Land Use Map



Source(s): ESRI, NearMap Imagery (2023), Town of Apple Valley (2023)

Figure 6

NAVISP Land Use Map

Surrounding Land Uses

The Project sites are generally surrounded with industrial and institutional uses and vacant land. Table 2, *Surrounding Land Uses* lists the surrounding land uses, as well as their proximity to the Project sites.

Table 2 Surrounding Land Uses

	Distance to West Project site	Distance to East Project site
Big Lots (1,339,070 sf)	40 ft north	1,350 ft south
Apple Valley Airport	1,428 ft east	2,467 ft south
Victor Valley Community College/ Victor Valley College Regional Public Safety	3,180 ft north	80 ft west
Walmart Distribution Center (1,102,482 sf)	1,870 ft north	708 ft west
Fresenius Medical Care Distribution (149,189 sf)	1,876 ft northeast	927 ft south

Surrounding General Plan and Zoning Designations

Table 3, *Surrounding Land Use Designations,* presents the existing land uses and land use designations for the uses surrounding each Project site.

Table 3 Surrounding Land Use Designations

Direction from Project Site(s)	Land Use	General Plan Designation	Zoning Designation	Specific Plan Land Use Designation
West Project site				
North	Big Lots	Specific Plan (SP)	(SP) Specific Plan	Specific Plan Industrial (I-SP)
East	Apple Valley Airport	Specific Plan (SP)	(SP) Specific Plan	Specific Plan Industrial (I-SP), Airport Industrial (I-A)
South	Vacant	Specific Plan (SP)	(SP) Specific Plan	Specific Plan Industrial (I-SP)
West	Vacant	Specific Plan (SP)	(SP) Specific Plan	Specific Plan Industrial (I-SP)
East Project site				
North	Vacant	Specific Plan (SP)	(SP) Specific Plan	Specific Plan Industrial (I-SP), General Industrial (I-G)
East	Vacant	Specific Plan (SP)	(SP) Specific Plan	Specific Plan Industrial (I-SP)
South	Vacant, Fresenius Medical Care Distribution	Specific Plan (SP)	(SP) Specific Plan	Specific Plan Industrial (I-SP), General Commercial (C-G)
West	Victor Valley Community College/ Victor Valley College Regional Public Safety, Big Lots	Specific Plan (SP)	(SP) Specific Plan	Specific Plan Industrial (I-SP)

II. PROJECT DESCRIPTION

The Project Applicant proposes to develop three speculative industrial warehouse buildings on two noncontiguous sites (described herein as "West Project site" and "East Project site"), totaling 3,729,100 sf. Speculative warehouses are designed to be flexible and meet the needs of a variety of potential tenants. Based on the existing land use designations of the Project sites, future tenants could include a broad range of clean manufacturing and warehousing uses, ranging from furniture manufacturing to warehouse distribution facilities.

The West Project site is proposed to be developed with one 896,500 sf industrial warehouse building and the East Project site with two industrial warehouse buildings: Building 1 (1,631,800 sf) and Building 2 (1,200,800 sf) totaling 2,832,600 sf. Both Project sites are vacant and undeveloped. Due to the speculative nature of the Project, cold storage has been analyzed within the technical analyses to account for potential future tenant needs. Cold storage warehousing, allowed under the Project site's NAVISP I-SP designation, involves the storing of perishable or other sensitive goods like food and medicines at a specific temperature range to maintain their integrity, shelf-life, and quality. The Applicant has elected to analyze 15% cold storage use in an effort to remain competitive with other similar projects in the area, which have typically included 10-15% cold storage usage.[2] The application materials for the Project are herein incorporated by reference pursuant to CEQA Guidelines Section 15150 and copies are available for review at the Town of Apple Valley Planning Department located at 14955 Dale Evans Parkway.

Required entitlements to allow development of the Project include Site Plan Review (for both sites) and a Tentative Parcel Map (East Project site only). The individual components of the Project are discussed below.

A. Project Components

West Project Site (SPR-2022-009)

The West Project site would be developed in conformance with the Town's General Plan and NAVISP Specific Plan Industrial land uses. Additionally, the Project has been designed to comply with all applicable design standards in the NAVISP. Development of the West Project site requires Site Plan Review (SPR-2022-009).

[2] 15% of the total Project square footage (3,729,100 × 0.15 = 559,365) was assumed to be cold storage.

Conceptual Site Plan

As illustrated in Figure 7, *Conceptual Site Plan – West Project Site*, the proposed building is rectangular-shaped with an east-west orientation within an approximately 45.8-net acre site (approximately 47.7 gross acres). The 52-foot-tall (at architectural features) building would provide 20,000 sf of office space and 876,500 sf of warehousing space within a 896,500-sf footprint. A gate-secured truck court with 112 dock doors (loading bays) and 304 trailer parking stalls are provided on the south side of the building. Additionally, the West Project site would provide 603 auto parking stalls located on eastern and western sides of the building for a total of 907 stalls (907 required). Moreover, the West Project site would provide 12 bike racks near the southeast corner of the proposed building, two stormwater detention basins along the west site boundary, as well as a trash enclosure and fire pump house. The southern boundary of the truck court would be lined with an 8-foot-high black tube steel fence for security purposes.

Development of the West Project site would include roadway improvements to Dachshund Avenue, Navajo Road, and Los Padres Road, consistent with the Town's standards. Full dedication of Los Padres Road along the Project site frontage will be required. Additionally, the Project would construct improvements at five driveways and on-site intersections.

Access to and from the West Project site would be provided via three private driveways along Navajo Road (36', 30', and 45' wide) and two private driveways along Dachshund Avenue (36' and 45' wide). All five driveways would be open to passenger vehicles and would allow full access (left and right turns in and out of the site). Trucks would be restricted to the southern driveway along Navajo Road and the two driveways along Dachshund Avenue (full access).

Utility improvements would also be implemented to serve the site. In summary, the Project would extend a 16-inch water line in Navajo Road, Los Padres Road and Dachshund Ave along the site's frontage. New water line points of connection (POCs) would be installed for domestic water, irrigation water, and fire water. A new 8-inch sanitary sewer lateral and POC would also be installed near the southeastern corner of the site.

Roadway and utility improvements proposed by the Project are discussed in detail under *Tentative Parcel Map No. 20658 (TPM No. 20658)*, A. *Project Infrastructure*, presented subsequently.

Conceptual Architecture Plan

The architectural elevations for the proposed building are illustrated on Figure 8, *Conceptual Architectural Elevations – West Project Site*. The proposed building features a varied roofline for visual interest and to reduce the perceived bulk and scale of the building. The building height would vary between 47 feet (at roof deck) and 52 feet (at architectural features) above lowest grade. The building would be constructed with painted concrete tilt-up panels and low-reflective, blue-glazed glass. The exterior color palette for the proposed building is comprised of various neutral colors, including shades of white and grey. Additionally, the proposed building would feature articulated building elements and aluminum canopies as decorative elements.

Conceptual Landscape Plan

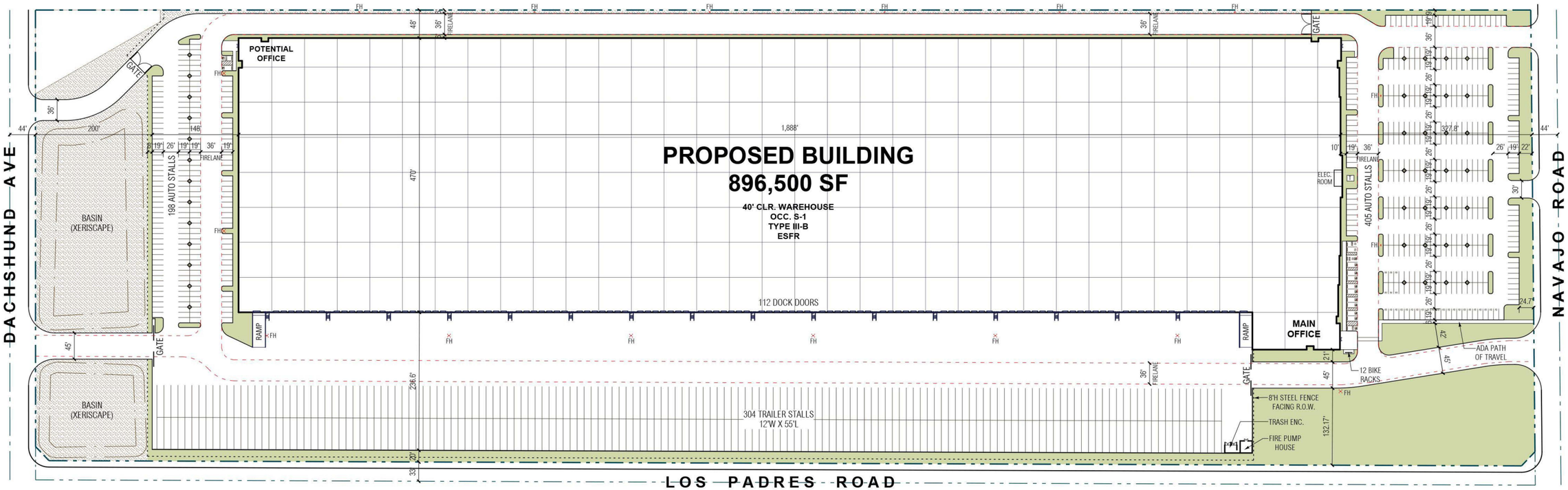
The proposed landscaping would be ornamental in nature and would feature drought-tolerant trees, shrubs, and accent plants in addition to a variety of groundcovers. As shown on Figure 9, *Conceptual Landscape Plan – West Project Site*, trees, shrubs, and groundcover are proposed along the Project site's interface with Navajo Road: a total of 179 trees (41 24" Box trees and 138 15-gallon trees). Landscaping would cover approximately 14.3 percent of the Project site (10 percent required). Landscaping would also be planted at building entries and in and around automobile parking areas. No plant materials are provided in the truck court to avoid interference with truck movements.

East Project Site (SPR-2022-010)

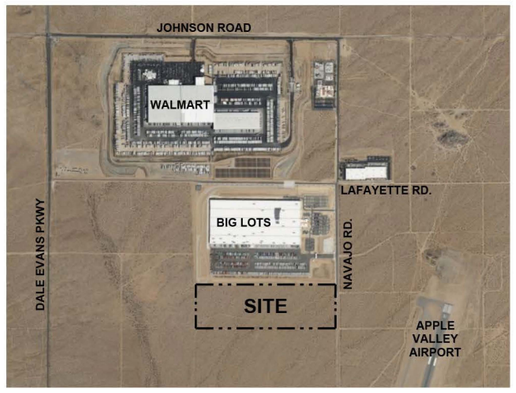
The East Project site would be developed in conformance with the Town's General Plan and NAVISP Specific Plan Industrial land uses. Additionally, the Project has been designed to comply with all applicable design standards in the NAVISP. Development of the East Project site requires SPR-2022-010 and Tentative Parcel Map No. 20658 (TPM No. 20658).

Conceptual Site Plans

As stated, the East Project site includes two speculative buildings; Building 1 (1,631,800 sf) and Building 2 (1,200,800 sf), totaling 2,832,600 sf. The proposed buildings are rectangular-shaped with an east-to-west orientation.



VICINITY MAP:



SITE LEGEND:

- PROPERTY / ROW LINE
- ADA PATH OF TRAVEL
- 8'H BLACK TUBE STEEL FENCE
- 8'H CHAIN LINK FENCE
- LANDSCAPE AREA
- XERISCAPE AREA
- FIRE HYDRANT
- PAD-MOUNT UTILITY TRANSFORMER
- TYPICAL PARKING STALLS - 9' X 19' STRIPED PER CITY STANDARDS
- TYPICAL TRAILER PARKING STALLS 12'W X 55'L - 6" WIDE PAINT STRIPE

PROJECT INFORMATION:

APN:	0463-231-62-0000
ZONE:	SPECIFIC PLAN
USE:	WAREHOUSE (S-1)
CONSTRUCTION TYPE:	III-B
MAX. ROOF DECK HEIGHT:	47'
MAX. BLDG HEIGHT AT ARCHITECTURAL FEATURES	52'

SHEET INDEX

ARCHITECTURAL	
A1-1-P	OVERALL SITE PLAN
A1-2-P	SITE PLAN DETAILS
A2-1-P	FLOOR PLAN
A2-2-P	ROOF PLAN
A3-1-P	ELEVATIONS
A3-2-P	ELEVATIONS
LANDSCAPE	
1 OF 1	CONCEPTUAL PLANTING PLAN

PROJECT DATA:

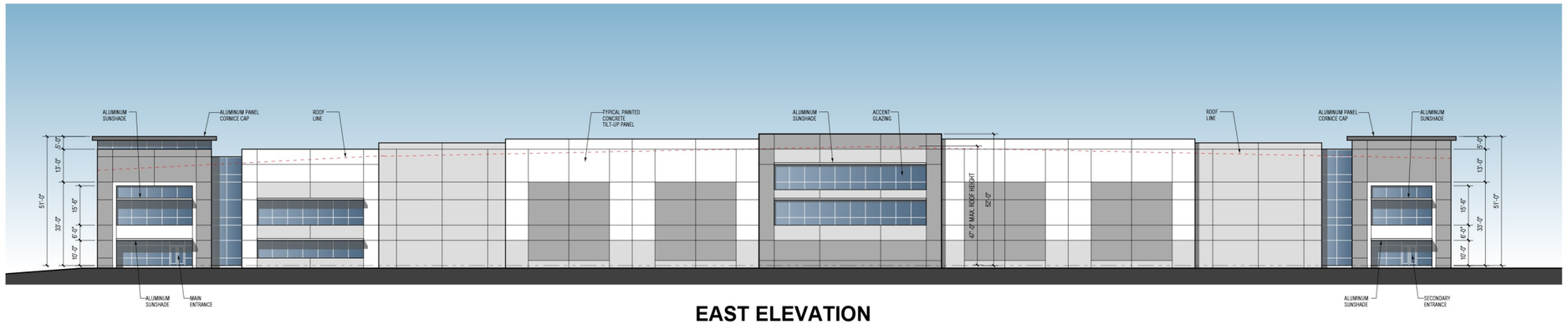
GROSS SITE AREA:	2,077,935 SF / 47.70 AC
LOS PADRES STREET DEDICATION:	85,346 SF
NET SITE AREA:	1,992,586 SF / 45.76 AC
BUILDING AREA:	896,500 SF
F.A.R.	.449
PARKING REQUIRED:	
1ST 10,000 SF @ 1/500 SF	20 STALLS
> 10,000 SF @ 1/1000 SF	887 STALLS
TOTAL REQUIRED:	907 STALLS
PARKING PROVIDED:	
AUTO STALLS	470 STALLS
TRAILER STALLS	304 STALLS
ADA STANDARD STALLS	10 STALLS
ADA VAN STALLS	2 STALLS
EVCS ADA STANDARD STALLS	1 STALLS
EVCS ADA VAN STALLS	1 STALLS
EVCS ADA AMBULATORY STALLS	1 STALLS
EVCS STANDARD STALLS	28 STALLS
EV CAPABLE STALLS	90 STALLS
TOTAL PROVIDED:	908 STALLS
DOCK LOADING POSITIONS:	112 DOCKS
NET LANDSCAPE AREA:	
LANDSCAPE REQUIRED:	10 % / 199,314 SF
LANDSCAPE PROVIDED:	14.3 % 285,000 SF

Source(s): RGA (05-13-2025)

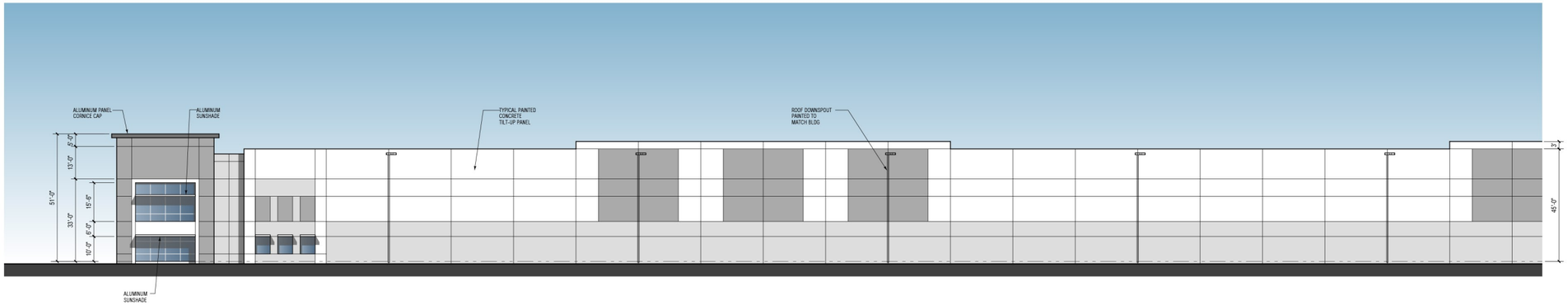
Figure 7

Not to Scale

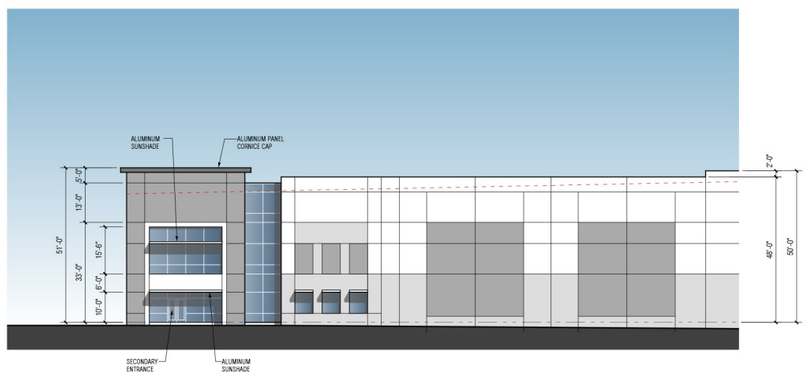
Conceptual Site Plan – West Project Site



EAST ELEVATION



PARTIAL NORTH ELEVATION



PARTIAL WEST ELEVATION

FINISH SCHEDULE:

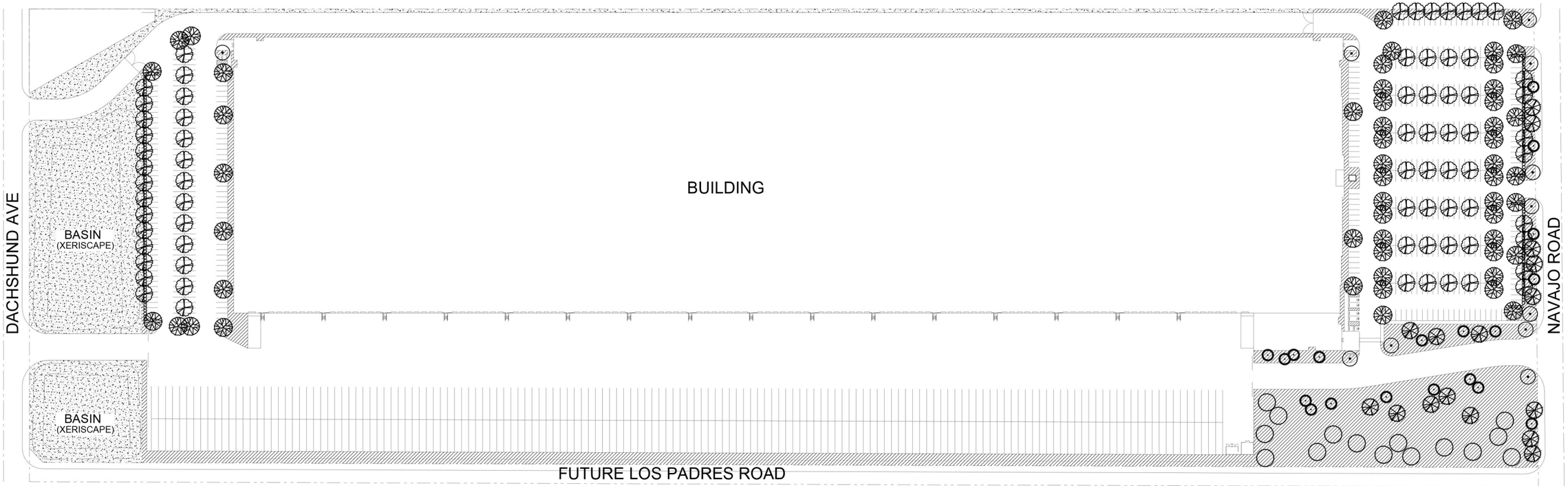
P-1	SW-7005 PURE WHITE
P-2	SW-7072 ONLINE
P-3	SW-7074 SOFTWARE
P-4	SW-7075 WEB GRAY
GL-1	PPG VISTACOOL PACIFICA W/ CLEAR ANOD. MULLION SYSTEM
	ACM-1 ALUMINUM COMPOSITE PANEL - ALUCOBOND BASALT GRAY

Source(s): RGA (12-04-2023)

Figure 8

Not to Scale

Conceptual Architectural Elevations – West Project Site



PLANTING LEGEND

TREES

SYMBOL	BOTANICAL/COMMON NAME	SIZE	QTY	WUCOLS	REMARKS
	Cercidium 'Desert Museum' Blue Palo Verde	24" Box	11	L	Multi
	Arbutus unedo Strawberry Tree	24" Box	15	L	Multi
	Pinus eldarica Afghan Pine	24" Box	15	L	Standard
	Gleditsia triacanthus Honey Locust	15 Gal	16	L	Standard
	Pistacia chinensis Chinese Pistache	15 Gal	52	L	Standard
	Ulmus parvifolia Chinese Elm	15 Gal	70	L	Standard

SHRUBS

SYMBOL	BOTANICAL/COMMON NAME	SIZE	QTY	WUCOLS	REMARKS
	Baccharis p. 'Centenial' Coyote Bush	5 Gal	633	L	
	Salvia clevelandii Cleveland Sage	5 Gal	197	L	
	Ligustrum j. Texanum Texas Privet	5 Gal	758	M	
	Leucophyllum frutiscens Texas Ranger	5 Gal	1660	L	
	Perovskia atriplicifolia Russian Sage	5 Gal	137	L	
	Pittosporum tobira 'Variegata' Variegated Mock Orange	5 Gal	223	M	
	Rhaphiolepis i. 'Springtime' Indian Hawthorn	5 Gal	189	M	
	Rhus ovata Holly Berry	5 Gal	806	L	
	Salvia greggii Autumn Sage	5 Gal	1101	L	

ACCENTS

SYMBOL	BOTANICAL/COMMON NAME	SIZE	QTY	WUCOLS	REMARKS
	Agave americana Century Plant	5 Gal	37	L	
	Agave 'Blue Glow Blue Glow Agave	5 Gal	14	L	
	Agave parryi Parry's Agave	5 Gal	236	L	
	Dasylerion wheeleri Desert Spoon	5 Gal	161	L	
	Hesperaloe parviflora Red Yucca	5 Gal	285	L	
	Pachycereus marginatus Mexican Fence Post	5 Gal	4	L	

GROUNDCOVER

SYMBOL	BOTANICAL/COMMON NAME	SIZE	QTY	WUCOLS	REMARKS
	Acacia redolens 'Low Boy' Dwarf Acacia	1 Gal	990	L	
	Dalea greggii Trailing Indio Bush	1 Gal	930	L	
	Rosmarinus o. 'Huntington Carpet' Prostrate Rosemary	1 Gal	758	L	

36" High Shrub Hedge

Xeriscape (Gravel)

Source(s): Hunter Landscape (12-04-2023)

Figure 9

Not to Scale

Conceptual Landscape Plan – West Project Site

As illustrated in Figure 10, *Conceptual Site Plan – East Project Site Building 1*, Building 1 would be 52 feet in height at architectural features and provide 1,631,800 sf of total floor area on approximately 89.5 gross acres. Building 1 would provide 30,000 sf of office space and 1,601,800 of warehousing space within the total footprint. A gate secured truck court would wrap around the northern, eastern, and southern sides of the building with 637 truck trailer parking stalls provided on the north, east, and south sides of the building; 128 dock doors (loading bays) would be provided along the northern side of the building, 42 dock doors would be provided along the eastern side of the building, and 140 dock doors would be provided along the southern side of the building for a total of 310 dock doors. Building 1 would provide 679 automobile parking stalls and 16 accessible parking stalls, with a majority of the automobile parking stalls on the west side of the building and 12 automobile parking stalls on the east side of the building. The northern and eastern perimeter of the truck court would be lined with a 8-foot-high tubular steel fence and the southern perimeter of the truck court would be lined with a 8-foot-high chain link fence for security purposes.

As illustrated in Figure 11, *Conceptual Site Plan - East Project Site Building 2*, Building 2 would be 52 feet in height at architectural features and provide 1,200,800 sf of total floor area on approximately 63.1 gross acres. Building 2 would provide 25,000 sf of office space and 1,175,800 sf of warehousing space within the building footprint. A gate secured truck court would wrap around the northern, western, and southern sides of the building with 403 truck trailer parking stalls provided on the north, west, and south sides of the building; 91 dock doors would be provided on the northern side of the building and 100 dock doors would be provided on the southern side of the building for a total of 191 dock doors. Building 2 would provide 604 automobile parking stalls and 16 accessible automobile parking stalls located on the eastern side of the building. The northern and western perimeter of the truck court would be lined with an 8-foot-high tubular steel fence and the southern perimeter of the truck court would be lined with a 8-foot-high chain link fence for security purposes. Patio dining areas, trash enclosures and fire pump houses would also be constructed on the site.

Development of the East Project site would include roadway improvements to Navajo Road, Johnson Road, and Central Road, consistent with the Town's standards. A 662' portion of the Johnson Road frontage will require a 52' dedication, with another 662' along this frontage requiring a 12' dedication. A 12' dedication along the entire Central Road frontage is also required. Additionally, the Project would construct improvements at nine driveways and on-site intersections.

Access to the Building 1 site would be provided via one private driveway along Navajo Road (36' wide) and three private driveways along Johnson Road (36', 45', and 50' wide). The driveway along Navajo Road would be restricted to automobiles and would provide full access to and from the site. The western most driveway along Johnson Road would be restricted to automobiles and the remaining two driveways would be restricted to trucks. All three driveways along Johnson Road would provide full access to and from the site.

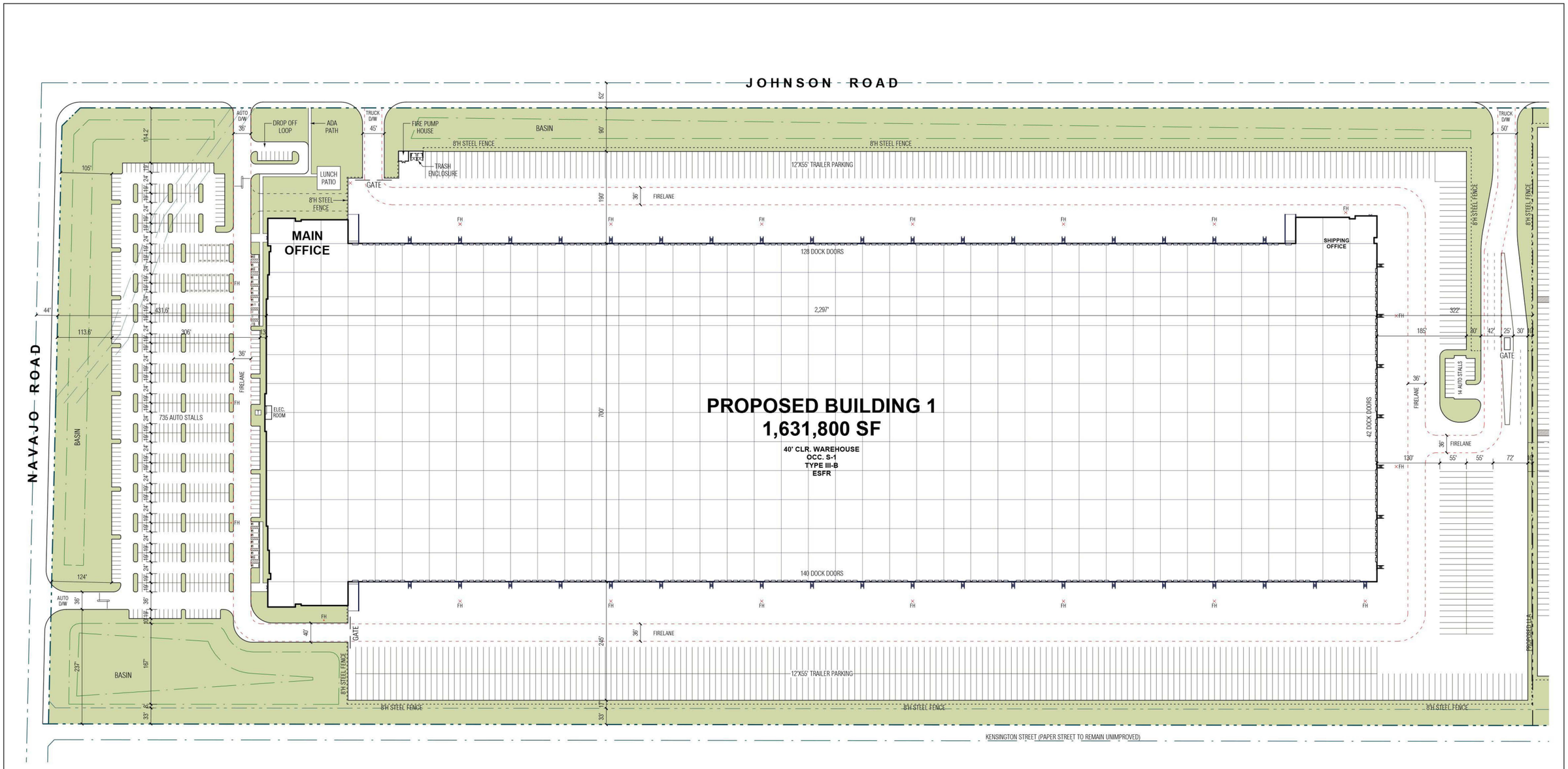
Access to the Building 2 site would be provided via one private driveway along Johnson Road (50' wide) and four private driveways along Central Road (50', 36', 36', and 50' wide). The driveway along Johnson Road would be restricted to trucks and would provide full access to and from the site. The inner driveways on Central Road would be restricted to automobile and the outer driveways would be restricted to trucks. All driveways along Central Road would provide full access to and from the site.

Utility improvements would also be implemented to serve the site. In summary, the Project would install a new 20-inch water line in Johnson (north of the site), a new 16-inch water line in Kensington Street (south of the site), and a new 16-inch water line in Central Road (east of the site). New water line POCs would be installed for domestic water, irrigation water, and fire water. The Project would connect to an existing 12-inch sewer line in Navajo Road.

Roadway and utility improvements proposed by the Project are discussed in detail under *Tentative Parcel Map No. 20658 (TPM No. 20658)*, A. *Project Infrastructure*, presented subsequently.

Conceptual Architecture Plans

The architectural elevations for the proposed building are illustrated on Figure 12, *Conceptual Architectural Elevations – East Project Site Building 1* and Figure 13, *Conceptual Architectural Elevations – East Project Site Building 2*. Building 1 and Building 2 feature varied rooflines for visual interest and to reduce the perceived bulk and scale of the building; building height would vary between 49 feet (at roof deck) and 52 feet (at architectural features) above lowest grade. The buildings would be constructed with painted concrete tilt-up panels and low-reflective, blue-glazed glass. The exterior color palette for the proposed building is comprised of various neutral colors, including shades of white and grey. Additionally, the proposed buildings would feature articulated building elements and aluminum canopies as decorative elements.

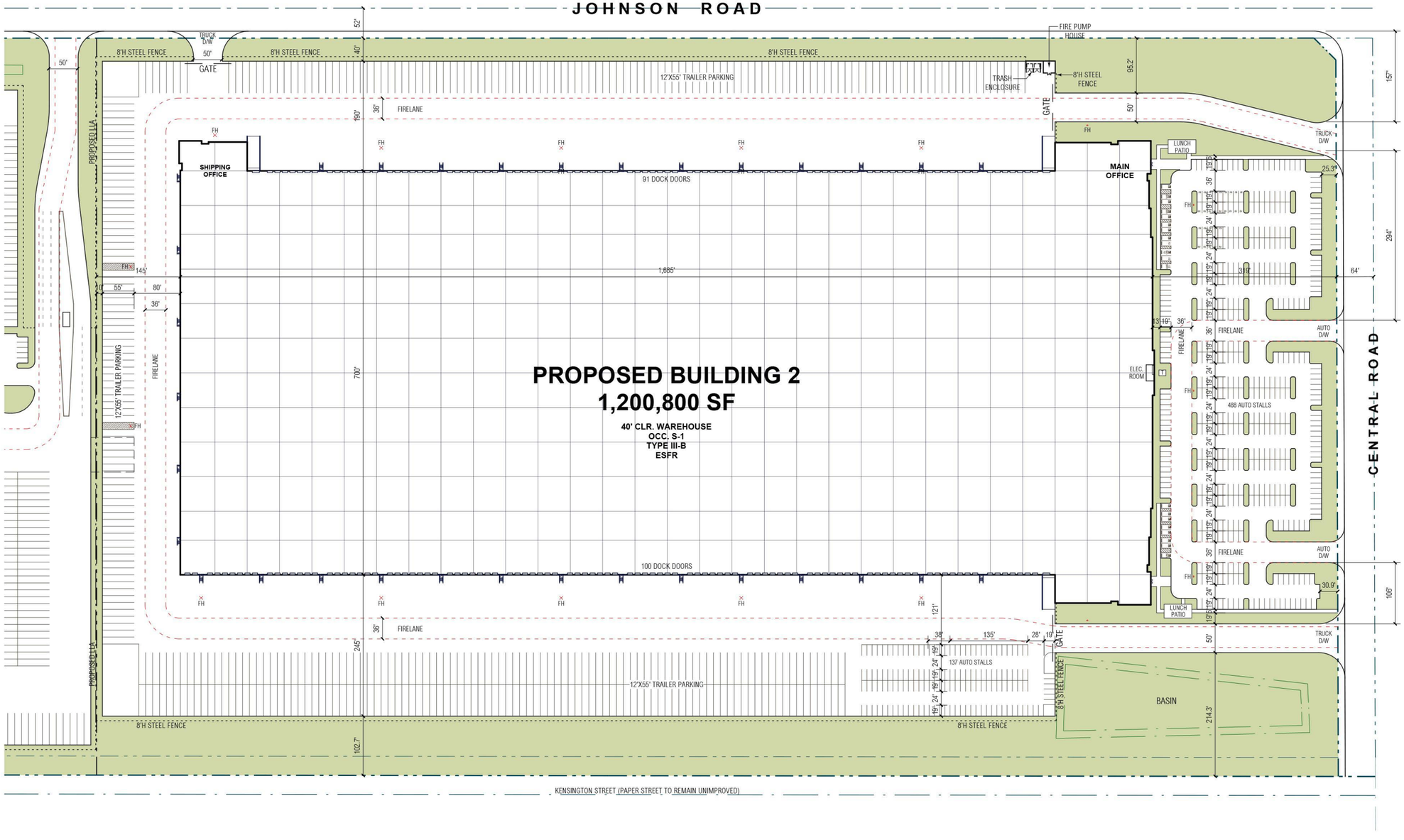


Source(s): RGA (05-13-2025)

Figure 10

Not to Scale

Conceptual Site Plan - East Project Site Building 1

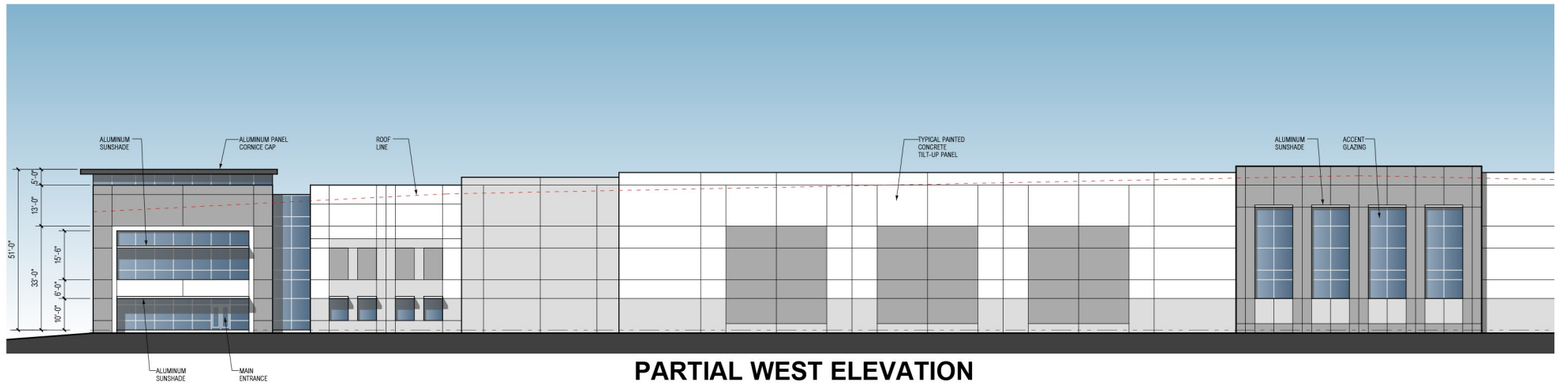


Source(s): RGA (05-13-2025)

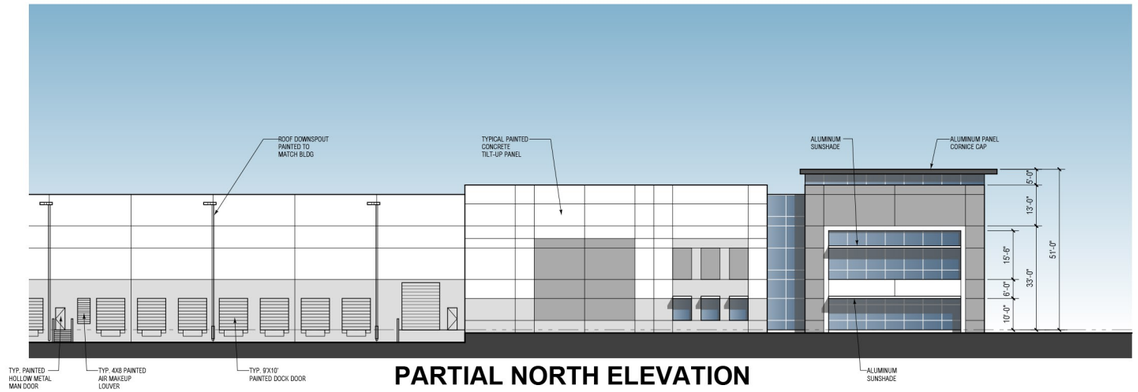
Figure 11

Not to Scale

Conceptual Site Plan - East Project Site Building 2



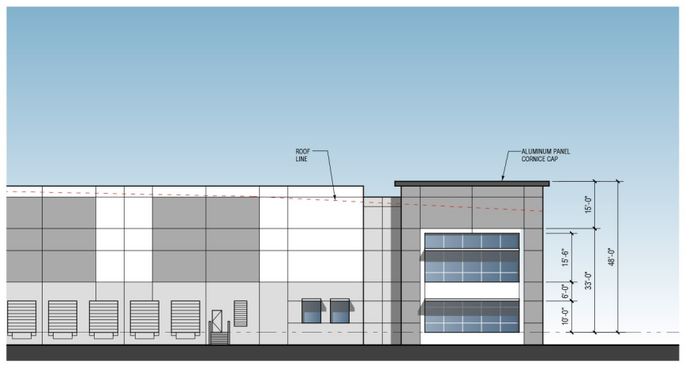
PARTIAL WEST ELEVATION



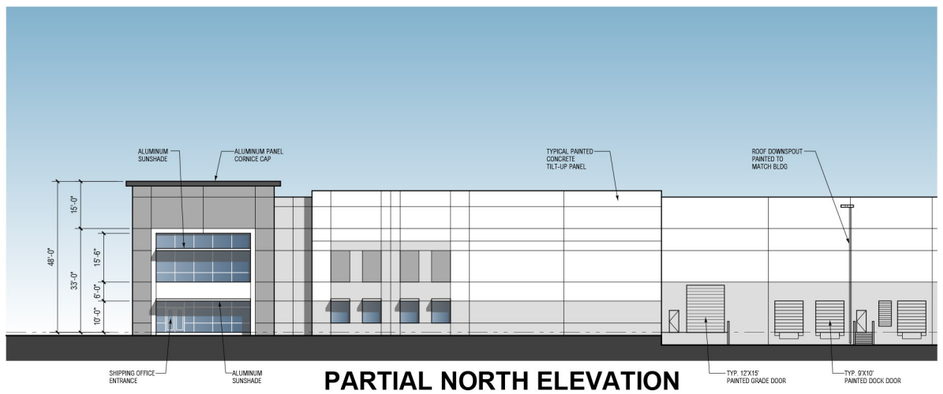
PARTIAL NORTH ELEVATION

FINISH SCHEDULE:

- P-1 SW-7005 PURE WHITE
- P-2 SW-7072 ONLINE
- P-3 SW-7074 SOFTWARE
- P-4 SW-7075 WEB GRAY
- GL-1 PPG VISTACOOL PACIFICA W/ CLEAR ANOD. MULLION SYSTEM
- ACM-1 ALUMINUM COMPOSITE PANEL - ALUCOBOND BASALT GRAY



PARTIAL EAST ELEVATION



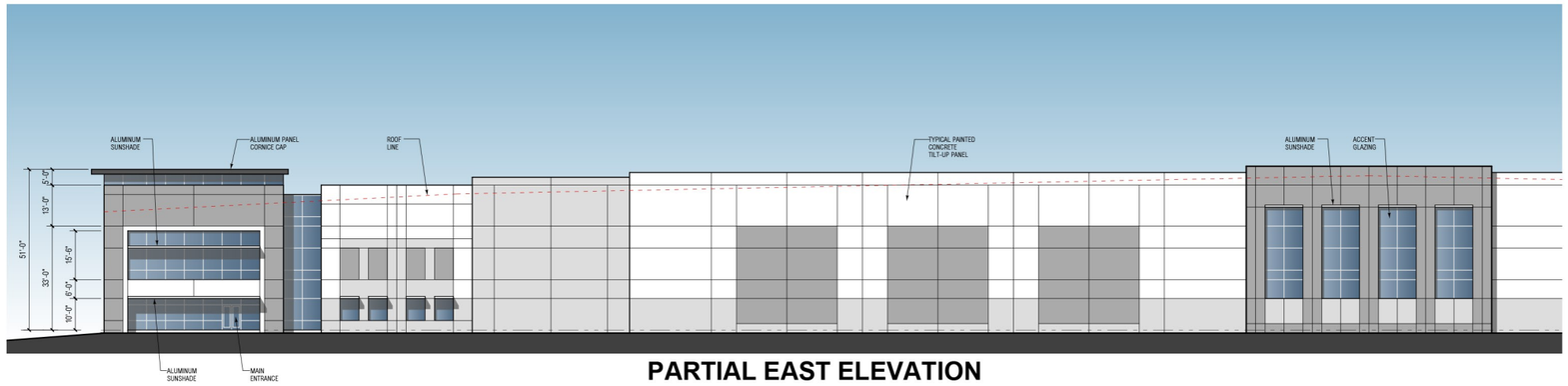
PARTIAL NORTH ELEVATION

Source(s): RGA (06-05-2023)

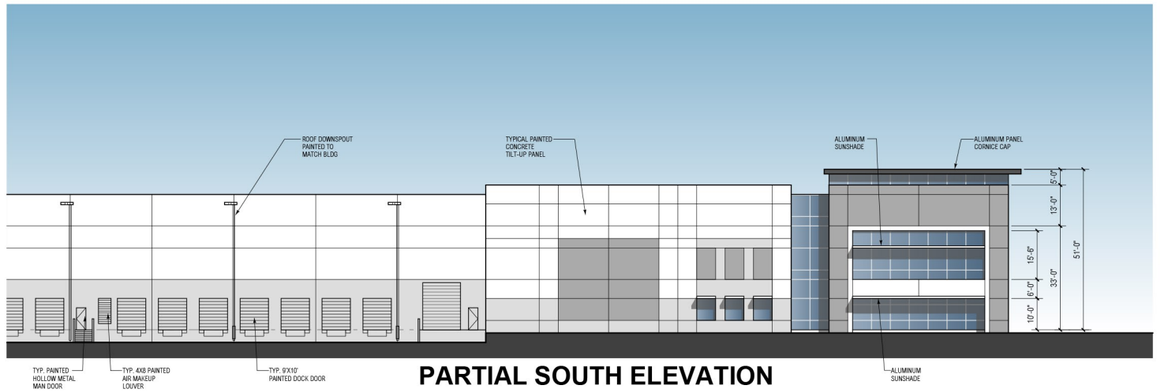
Figure 12

Not to Scale

Conceptual Architectural Elevations - East Project Site Building 1



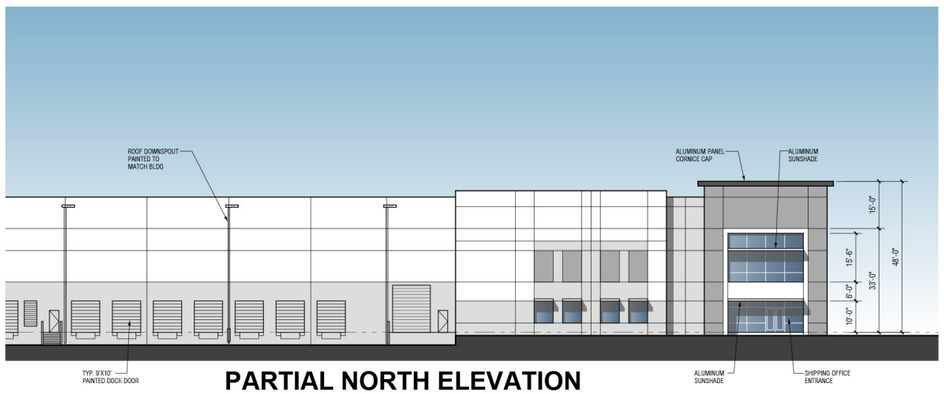
PARTIAL EAST ELEVATION



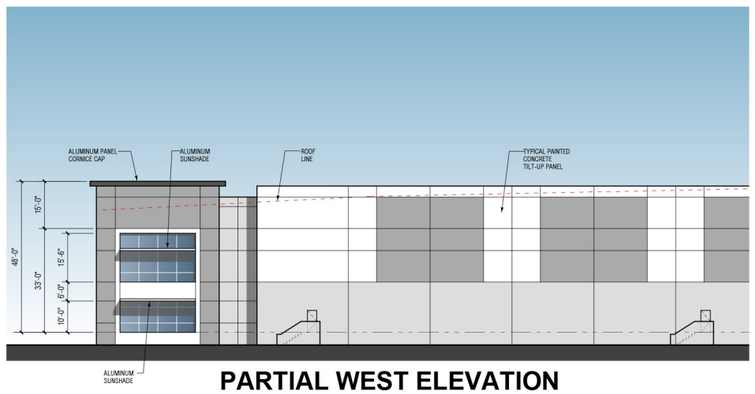
PARTIAL SOUTH ELEVATION

FINISH SCHEDULE:

- P-1 SW-7005 PURE WHITE
- P-2 SW-7072 ONLINE
- P-3 SW-7074 SOFTWARE
- P-4 SW-7075 WEB GRAY
- GL-1 PPG VISTACOOL PACIFICA W/ CLEAR ANOD. MULLION SYSTEM
- ACM-1 ALUMINUM COMPOSITE PANEL - ALUCOBOND BASALT GRAY



PARTIAL NORTH ELEVATION



PARTIAL WEST ELEVATION

Source(s): RGA (06-05-2023)

Figure 13

Not to Scale

Conceptual Architectural Elevations - East Project Site Building 2

Conceptual Landscape Plans

The proposed landscaping would be ornamental in nature and would feature drought-tolerant trees, shrubs, and accent plants in addition to a variety of groundcovers. As shown on B.Figure 14, *Conceptual Landscape Plan – East Project Site Building 1* and B.Figure 15, *Conceptual Landscape Plan – East Project Site Building 2,* trees, shrubs, and groundcover are proposed along the site's perimeter: a total of 884 trees (500 24" Box trees and 384 15-gallon trees). Landscaping would cover approximately 17.9 percent of the site. Landscaping also would be planted at building entries and in and around the automobile parking area. No plant materials are provided in the truck court to avoid interference with truck movements.

Tentative Parcel Map No. 20658 (TPM No.20658)

The proposed tentative parcel map would consolidate the East Project site's 10 existing parcels - 0463-232-02, -03, -04, -05, -06; 0463-232-53, -54, -55, -56; and 0463-232-73 - into one parcel consisting of approximately 152 gross acres, as shown on Figure 16, *Tentative Parcel Map No. 20658*.

B. Project Infrastructure

Road Improvements

West Project Site

Development of the West Project site would include roadway improvements to Dachshund Avenue, Navajo Road, and Los Padres Road, consistent with the Town's standards. Additionally, the Project would construct improvements at five driveways and on-site intersections, as described in Section 1.5.2 of the Traffic Analysis (*Appendix J2*). Specifically, the Project would construct Dachshund Avenue from the West Project site's northern boundary to Los Padres Road at its ultimate half-section width as a Secondary Road (ultimate 88-foot right-of-way). The Project will also provide an additional 12 feet of pavement width to accommodate one southbound lane from the West site's northern boundary to Los Padres Road to facilitate site access. The Project would construct Navajo Road from the West Project site's northern boundary to Los Padres Road at its ultimate half-section width as a Secondary Road (ultimate 88-foot right-of-way) and Los Padres Road from the West Project site's western boundary to Navajo Road at its ultimate half-section width as a Commercial/Industrial Collector roadway (ultimate 66-foot right-of-way). The Project will

also provide an additional 12 feet of pavement width to accommodate one eastbound lane from the Project's western boundary to Navajo Road to facilitate site access.

East Project Site

Development of the East Project site would include roadway improvements to Navajo Road, Johnson Road, and Central Road, consistent with the Town's standards. Additionally, the Project would construct improvements at nine driveways and on-site intersections, as described in Section 1.5.2 of the Traffic Analysis (*Appendix J2*).

The Project Applicant would construct Navajo Road from Johnson Road to the East Project site's southern boundary at its ultimate half-section width as a Secondary Road (ultimate 88-foot right-of-way), including a 6-foot sidewalk, and 6-foot landscape parkway. Johnson Road would be constructed from Navajo Road to Central Road at its ultimate half-section width as a Major Road (ultimate 104-foot right-of-way), including a 12-foot landscape parkway. In addition, the Project would construct Central Road at its ultimate half-section width as a Major Divided Arterial (128-foot right-of-way) along the Project's frontage from Johnson Road to the East Project site's southern boundary, including a 12-foot landscape parkway.

Utility Improvements

The Project's proposed utilities plans are depicted in Figure 17, *Conceptual Utility Plan – West Project Site* through Figure 18, *Conceptual Utility Plan – East Project Site* and are described below.

West Project Site

Water Infrastructure

Liberty Utilities is the private water supplier for the NAVISP Area, including the Project sites. There is an existing 16-inch ductile iron pipe (DIP) domestic water line in Navajo Road, north of the site. There is also an existing 12-inch asbestos concrete domestic water line in Navajo Road.

As part of the Project, the Applicant would extend the 16-inch line in Navajo Road along the site's eastern frontage with Navajo Road, bypassing the existing abandoned 12-inch asbestos concrete line.

PLANTING LEGEND

TREES

SYMBOL	BOTANICAL/COMMON NAME	SIZE	QTY	WUCOLS	REMARKS
	Cercidium 'Desert Museum' Blue Palo Verde	24" Box	55	L	Multi
	Arbutus unedo Strawberry Tree	24" Box	66	L	Multi
	Pinus eldarica Afghan Pine	24" Box	230	L	Standard
	Platanus acerifolia London Plane	24" Box	147	M	Standard
	Gleditsia triacanthus Honey Locust	15 Gal	126	L	Sandard
	Pistacia chinensis Chinese Pistache	15 Gal	197	L	Sandard
	Ulmus parvifolia Chinese Elm	15 Gal	61	L	Standard

SHRUBS

SYMBOL	BOTANICAL/COMMON NAME	SIZE	QTY	WUCOLS	REMARKS
	Baccharis p. 'Centennial' Coyote Bush	5 Gal	633	L	
	Ligustrum j. Texanum Texas Privet	5 Gal	758	M	
	Leucophyllum frutescens Texas Ranger	5 Gal	1660	L	
	Perovskia atriplicifolia Russian Sage	5 Gal	137	L	
	Pittosporum tobira 'Variegata' Variegated Mock Orange	5 Gal	223	M	
	Rhaphiolepis i. 'Springtime' Indian Hawthorn	5 Gal	189	M	
	Rhus ovata Holly Berry	5 Gal	806	L	
	Salvia clevelandii Cleveland Sage	5 Gal	197	L	
	Salvia greggii Autumn Sage	5 Gal	1101	L	

ACCENTS

SYMBOL	BOTANICAL/COMMON NAME	SIZE	QTY	WUCOLS	REMARKS
	Agave americana Century Plant	5 Gal	37	L	
	Agave 'Blue Glow' Blue Glow Agave	5 Gal	14	L	
	Agave parryi Parry's Agave	5 Gal	236	L	
	Dasylirion wheeleri Desert Spoon	5 Gal	161	L	
	Hesperaloe parviflora Red Yucca	5 Gal	285	L	
	Fallugia paradoxa Apache Plume	5 Gal	4	L	

GROUNDCOVER

SYMBOL	BOTANICAL/COMMON NAME	SIZE	QTY	WUCOLS	REMARKS
	Acacia redolens 'Low Boy' Dwarf Acacia	1 Gal	990	L	
	Dalea greggii Trailing Indigo Bush	1 Gal	930	L	
	Rosmarinus o. 'Huntington Carpet' Prostrate Rosemary	1 Gal	758	L	

36" High Shrub Hedge

Basin Seed Mix
2000 lbs/ac Wood cellulose fiber
800 lbs/ac 7-2-1 Blend organic fertilizer
150 lbs/ac Stabilizing binder
20 lbs/ac Endo mat mycorrhizal inoculum
1 lbs/ac Eschscholzia californica
1 lbs/ac Eschscholzia caespitosa
4 lbs/ac Leymus triticoides Rio
3 lbs/ac Clarkia rhomboidea
12 lbs/ac Festuca rubra 'Molate'
1 lbs/ac Hordium depressum

VICINITY MAP

TREES


Cercidium 'Desert Museum' /
Blue Palo Verde


Arbutus unedo /
Strawberry Tree


Pinus eldarica /
Afghan Pine


Platanus acerifolia /
London Plane


Gleditsia triacanthus /
Honey Locust


Pistacia chinensis /
Chinese Pistache


Ulmus parvifolia /
Chinese Elm

Source(s): Hunter Landscape (07-16-2024)

Figure 14

Not to Scale

Conceptual Landscape Plan - East Project Site Building 1

PLANTING LEGEND

TREES

SYMBOL	BOTANICAL/COMMON NAME	SIZE	QTY	W/UCOLS	REMARKS
	Cercidium 'Desert Museum' Blue Palo Verde	24" Box	55	L	Multi
	Arbutus unedo Strawberry Tree	24" Box	68	L	Multi
	Pinus eldarica Afghan Pine	24" Box	230	L	Standard
	Platanus acerifolia London Plane	24" Box	147	M	Standard
	Gleditsia triacanthus Honey Locust	15 Gal	126	L	Standard
	Pistacia chinensis Chinese Pistache	15 Gal	197	L	Standard
	Ulmus parvifolia Chinese Elm	15 Gal	61	L	Standard

SHRUBS

SYMBOL	BOTANICAL/COMMON NAME	SIZE	QTY	W/UCOLS	REMARKS
	Baccharis p. 'Centennial' Coyote Bush	5 Gal	633	L	
	Ligustrum j. 'Texanum' Texas Privet	5 Gal	758	M	
	Leucophyllum frutescens Texas Ranger	5 Gal	1660	L	
	Perovskia atriplicifolia Russian Sage	5 Gal	137	L	
	Pittosporum tobira 'Variegata' Variegated Mock Orange	5 Gal	223	M	
	Rhaphiolepis i. 'Springtime' Indian Hawthorn	5 Gal	189	M	
	Rhus ovata Holly Berry	5 Gal	806	L	
	Salvia clevelandii Cleveland Sage	5 Gal	197	L	
	Salvia greggii Autumn Sage	5 Gal	1101	L	

ACCENTS

SYMBOL	BOTANICAL/COMMON NAME	SIZE	QTY	W/UCOLS	REMARKS
	Agave americana Century Plant	5 Gal	37	L	
	Agave 'Blue Glow' Blue Glow Agave	5 Gal	14	L	
	Agave parryi Parry's Agave	5 Gal	236	L	
	Dasylirion wheeleri Desert Spoon	5 Gal	161	L	
	Hesperaloe parviflora Red Yucca	5 Gal	285	L	
	Pachycereus marginatus Mexican Fence Post	5 Gal	4	L	

GROUNDCOVER

SYMBOL	BOTANICAL/COMMON NAME	SIZE	QTY	W/UCOLS	REMARKS
	Acacia redolens 'Low Boy' Dwarf Acacia	1 Gal	990	L	
	Dalea greggii Trailing Indigo Bush	1 Gal	930	L	
	Rosmarinus o. 'Huntington Carpet' Prostrate Rosemary	1 Gal	758	L	

36" High Shrub Hedge

Basin Seed Mix

2000 lbs/ac	Wood cellulose fiber	
800 lbs/ac	7-2-1 Blood organic fertilizer	
150 lbs/ac	Stabilizing binder	
20 lbs/ac	Endo mit mycorrhizal inoculum	
1 lbs/ac	Achillea millefolium	
2 lbs/ac	Eschscholzia caespitosa	
4 lbs/ac	Leymus triticoides Rio	
3 lbs/ac	Descampsia cespitosa	
12 lbs/ac	Festuca rubra 'Molate'	
1 lbs/ac	Hordium depressum	

WATER EFFICIENT LANDSCAPE WORKSHEET BLDG 1

Reference Evapotranspiration Rate (Eto): 57.04

Hydrozone # / Planting Description	Plant Factor (PF)	Irrigation Method	Irrigation Efficiency (IE)	ETAF (PF/IE)	Landscape Area	ETAF x Area	Estimated Total Water Use (ETWU) Gallons per Year	Estimated Total Water Use (ETWU) Acre Feet per Year
Regular Landscape Areas Potable Water								
Low Water Use Landscape	0.2	Drip	0.81	0.25	66,100	16,321	378,693	1.16
Low/Med Use Landscape	0.3	Drip	0.81	0.37	29,500	10,926	115,918	0.36
Low Water Use Landscape	0.2	Rotary	0.81	0.2	545,607	134,718	952,853	2.92
Low/Med Use Landscape	0.1	Bubbler	0.81	0.12	50,000	6,173	21,830	0.07
				Totals	**691,207**	**168,138**		
						ETWU Total	1,469,295	4.51
						Maximum Allowed Water Allowance (MAWA)	10,999,979	33.76
Special Landscape Areas Recycled Water								
Hydrozone 2	[redacted]			1	-	-	-	0.00
Hydrozone 2				1	-	-	-	0.00
Hydrozone 4				1	-	-	-	0.00
Hydrozone 6				1	-	-	-	0.00
				Totals	-	-		
						ETWU Total	-	0.00
						Maximum Allowed Water Allowance (MAWA)	-	0.00

ETAF Calculations

Regular Landscape Areas

Total ETAF x Area	168,138
Total Area	691,207
Average ETAF	**0.243252**

All Landscaep Areas

Total ETAF x Area	168,138
Total Area	691,207
Sitewide ETAF	**0.243252**

Irrigation Efficiency

Drip Irrigation	0.81
Overhead Spray	0.75
Rotors	0.75

WATER EFFICIENT LANDSCAPE WORKSHEET BLDG 2

Reference Evapotranspiration Rate (Eto): 56.4

Hydrozone # / Planting Description	Plant Factor (PF)	Irrigation Method	Irrigation Efficiency (IE)	ETAF (PF/IE)	Landscape Area	ETAF x Area	Estimated Total Water Use (ETWU) Gallons per Year	Estimated Total Water Use (ETWU) Acre Feet per Year
Regular Landscape Areas Potable Water								
Low Water Use Landscape	0.2	Drip	0.81	0.25	60,000	14,815	339,889	1.04
Low/Med Use Landscape	0.3	Drip	0.81	0.37	30,000	11,111	116,560	0.36
Low Water Use Landscape	0.2	Rotary	0.81	0.2	311,658	76,953	538,176	1.65
Low/Med Use Landscape	0.1	Rotary	0.81	0.12	100,000	12,346	43,170	0.13
				Totals	**501,658**	**115,224**		
						ETWU Total	1,037,795	3.18
						Maximum Allowed Water Allowance (MAWA)	7,893,890	24.23
Special Landscape Areas Recycled Water								
Hydrozone 2	[redacted]			1	-	-	-	0.00
Hydrozone 2				1	-	-	-	0.00
Hydrozone 4				1	-	-	-	0.00
Hydrozone 6				1	-	-	-	0.00
				Totals	-	-		
						ETWU Total	-	0.00
						Maximum Allowed Water Allowance (MAWA)	-	0.00

ETAF Calculations

Regular Landscape Areas

Total ETAF x Area	115,224
Total Area	501,658
Average ETAF	**0.229687**

All Landscaep Areas

Total ETAF x Area	115,224
Total Area	501,658
Sitewide ETAF	**0.229687**

Irrigation Efficiency

Drip Irrigation	0.81
Overhead Spray	0.75
Rotors	0.75

VICNITY MAP

TREES


Cercidium 'Desert Museum' / Blue Palo Verde


Arbutus unedo / Strawberry Tree


Pinus eldarica / Afghan Pine


Platanus acerifolia / London Plane


Gleditsia triacanthus / Honey Locust


Pistacia chinensis / Chinese Pistache

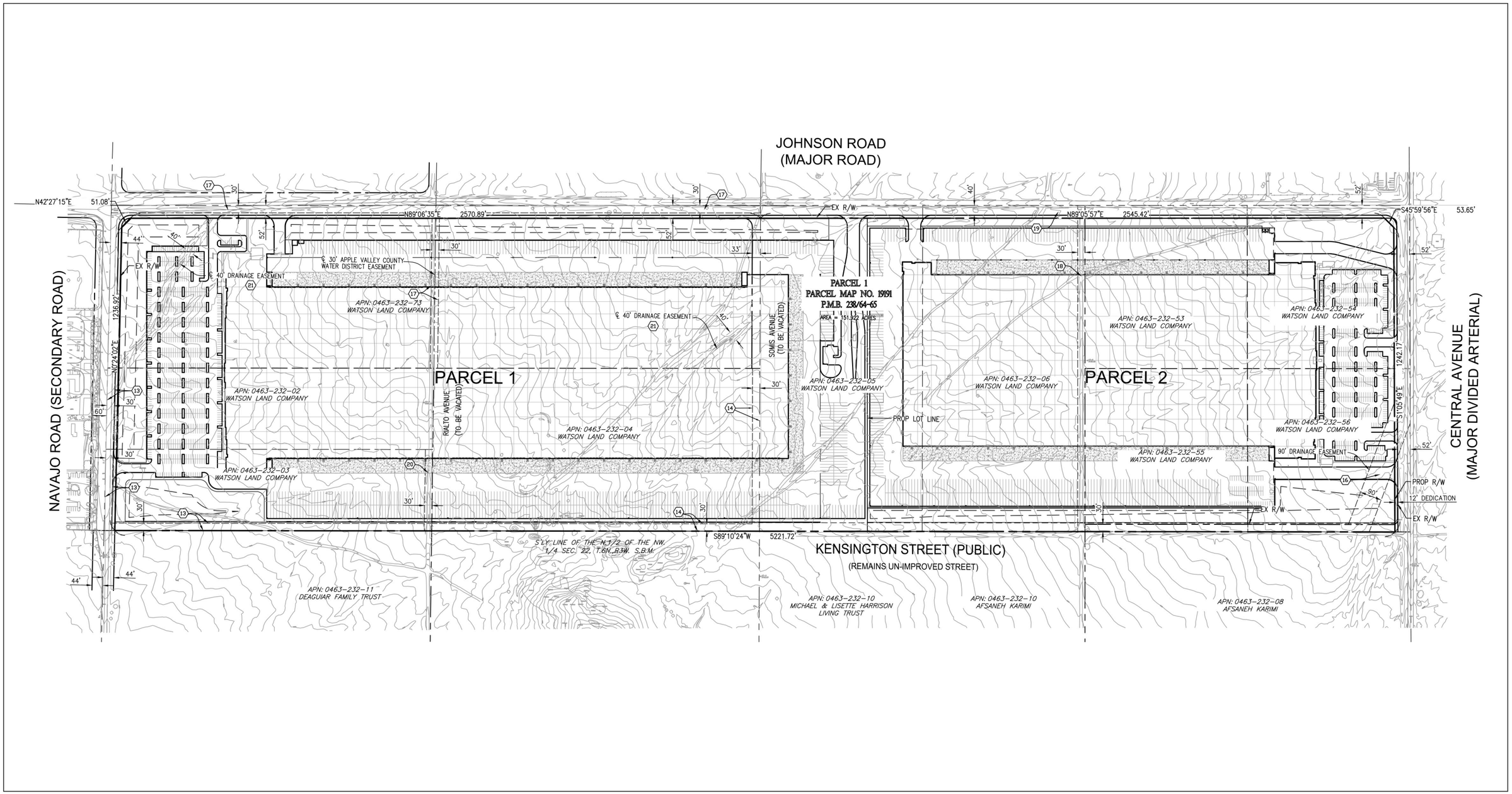

Ulmus parvifolia / Chinese Elm

Source(s): Hunter Landscape (07-16-2024)

Figure 15

Not to Scale

Conceptual Landscape Plan - East Project Site Building 2

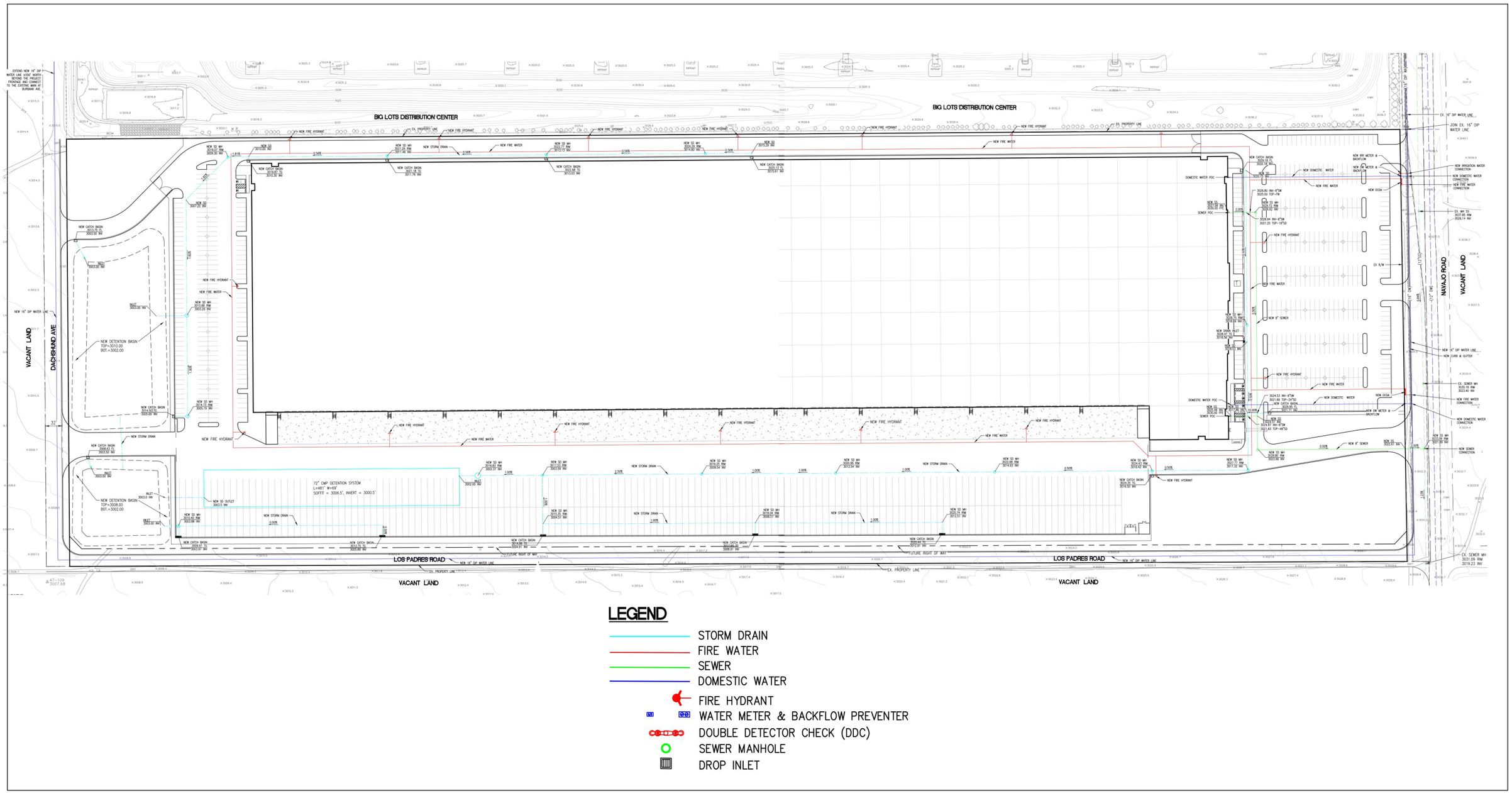


Source(s): WestLAND Group, Inc. (03-03-2025)

Figure 16

Not to Scale

Tentative Parcel Map No. 20658



LEGEND

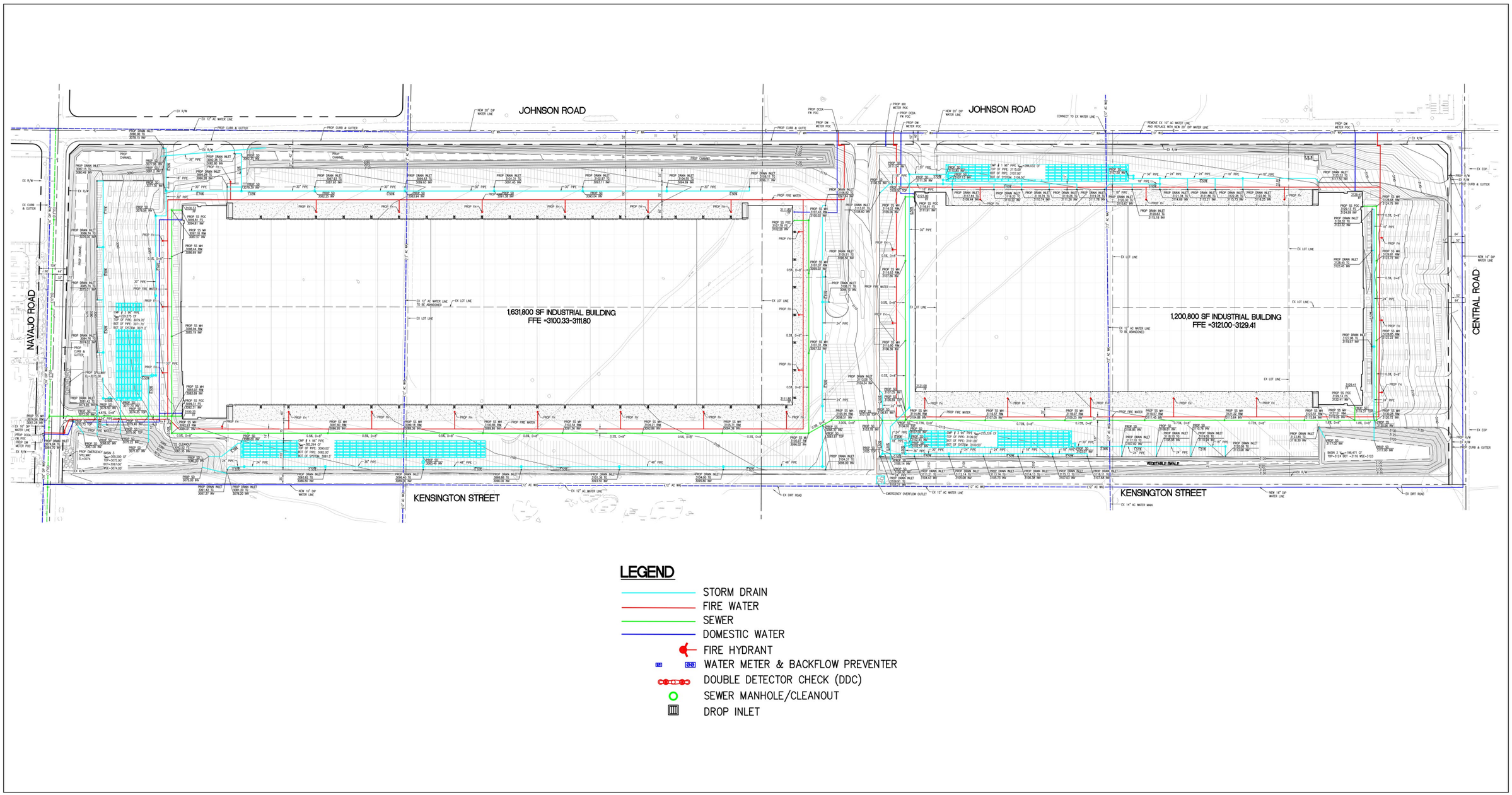
- STORM DRAIN
- FIRE WATER
- SEWER
- DOMESTIC WATER
- FIRE HYDRANT
- WATER METER & BACKFLOW PREVENTER
- DOUBLE DETECTOR CHECK (DDC)
- SEWER MANHOLE
- DROP INLET

Source(s): WestLAND Group, Inc. (February 2025)

Figure 17

Not to Scale

Conceptual Utility Plan - West Project Site



Source(s): WestLAND Group, Inc. (08-16-2024)

Figure 18

Not to Scale

Conceptual Utility Plan - East Project Site

Additionally, the Project would include the construction of two (2) new domestic waterline points of connections (POCs) that would be installed near the northeastern and southeastern corners of the Project site that would connect to the new 16-inch DIP domestic water line to be constructed within Navajo Road. The Project would also include the construction of one irrigation water line POC near the northeastern corner of the site and one fire water POC near the southeastern corner of the site.

Sanitary Sewer Infrastructure

On December 13, 1977, the former Apple Valley Water District (AVWD) entered into a Joint Powers Authority (JPA) agreement with the Victor Valley Wastewater Reclamation Authority (VVWRA). The Town of Apple Valley is the successor agency to the AVWD. The JPA agreement was amended and reinstated on December 15, 1998. VVWRA, per agreement, is responsible for the collection and treatment of the Town's wastewater; however, the Town still maintains full ownership, operation, and maintenance for the Town's sewer system. The Town operates the local wastewater collection system in accordance with the plans and projections contained in the Town's Sewer Master Plan.

There is an existing 12-inch sanitary sewer line within Navajo Road. As part of Project construction at the Project site, a new 8-inch sanitary sewer lateral and POC would be installed near the southeastern corner of the site.

Stormwater Drainage Infrastructure

The Project Applicant would construct an on-site storm drain system at the West Project site that consists of a network of catch basins, private storm drain pipes, one hydrodynamic separator, two detention basins, and one underground infiltration chamber. On-site "first flush" stormwater runoff flows (i.e., typically the first ¾-inch of initial surface runoff after a rainstorm, which contains the highest proportion of waterborne pollution) would be collected by the proposed network of catch basins and routed through a hydrodynamic separator before flowing into the underground infiltration chamber, which is located within the truck yard in the southern portion of the West Project site. The hydrodynamic separator is a stormwater treatment device that separates floatables (e.g., trash, debris, and oil) and settleable particles, like sediment, from stormwater runoff. The stormwater that flows into the basins located on the west side of the site would ultimately percolate into the ground. This system stores stormwater runoff until it gradually exfiltrates into the underlying soil that contains several layers of filtering media atop native soils. Pollutant removal occurs through the infiltration of runoff and the absorption of pollutants into the soil. This practice has high pollutant removal efficiency. The proposed on-site storm drain system is designed to meet the Project's

water quality requirements and provide sufficient storage to meet the 100-year storm hydrology requirement. In a large storm event, stormwater would bypass the underground chamber via pipes and would gravity flow out into the above ground basins. The above ground basins would be equipped with emergency spillway that discharges southwest into the undeveloped land, terminating at local low point and evaporating or infiltrating into the ground.

The West Project site would receive flows and immediately redirect the flows to the west, past the detention basins, allowing the runoff to continue southwest to maintain the natural drainage pattern.

Dry Utilities

Dry utilities serving the Project area include Southern California Edison, Southwest Gas, and various telecommunication providers. The Project would include installation of onsite dry utility infrastructure that is anticipated to connect with the existing infrastructure available in the vicinity.

East Project Site

Water Infrastructure

As previously discussed, Liberty Utilities provides water to the NAVISP Area, including the Project sites. There is an existing 16-inch DIP domestic water line within Navajo Road abutting the site's west property line. There is a relocated 12-inch domestic water line that transitions to a 10-inch water line within Johnson Road between an unnamed dirt road and Central Road. Additionally, there is an existing 12-inch water main within Kensington Street.

The Project would install a new 20-inch DIP water line in Johnson (north of the site), a new 16-inch DIP water line in Kensington Street (south of the site), and a new 16-inch DIP water line in Central Road (east of the site).

The Project would include the construction of four (4) new domestic waterline POCs. One would be installed near the southwest corner of the East Project site; one would be installed at the center of the northern boundary of the East Project site; one would be installed near the northeast corner of the East Project site; and one would be installed along the southern boundary of the East Project site. The Project would also include the construction of one irrigation water line POC at the center of the northern boundary, one fire water POC near the southwestern corner of the site, and one fire water POC at the center of the northern boundary.

Sanitary Sewer Infrastructure

As previously discussed, VVWRA is responsible for the collection and treatment of the Town's wastewater; however, the Town maintains full ownership, operation, and maintenance for the Town's sewer system. There is an existing 12-inch sanitary sewer line within Navajo Road. As part of construction at the Project site, one new sanitary sewer POC would be installed near the southwestern corner of the site.

Stormwater Drainage Infrastructure

The Project would provide an on-site storm drain system at the East Project site that consists of a network of catch basins, private storm drain pipes, one blue line stream offsite flow channel, three retention basins (Basins 1 through 3), and four underground infiltration chambers (Chambers 1 through 4). For the Building 1 portion of the site, the on-site "first flush" stormwater runoff flows (i.e., typically the first ¾-inch of initial surface runoff after a rainstorm, which contains the highest proportion of waterborne pollution) in the north would be collected by the proposed network of catch basins and routed to the retention basin (Basin 1) with Chamber 1 to the north, and runoff in the east would be conveyed to retention basin (Basin 2) to the east, and runoff in the south would be conveyed to Chamber 2 to the south. For the Building 2 portion of the site, the on-site "first flush" stormwater runoff flows in the north and west would be collected by the proposed network of catch basins and routed to Basin 3 with Chamber 3 to the west and runoff in the south, and east would be conveyed to Chamber 4. The stormwater that flows into the retention basins would ultimately percolate into the ground. This system stores stormwater runoff until it gradually exfiltrates into the underlying soil that contains several layers of filtering media atop native soils. Pollutant removal occurs through the infiltration of runoff and the absorption of pollutants into the soil. This practice has high pollutant removal efficiency. The proposed on-site storm drain system is designed to meet the Project's water quality requirements and provide sufficient storage to meet the 100-year storm hydrology requirement. In a large storm event, stormwater would escape via emergency spillway and would be routed west along Johnson Road for Basin 1, south along Central Road for Basin 2, and south along Navajo Road for Basin 3. Stormwater would ultimately continue southwest and infiltrate into the ground or evaporate.

The East Project site lies in the path of a blue line stream which is a body of concentrated flowing water in a natural low area or natural channel on the land surface and may be any creek, stream or other flowing water feature, perennial or ephemeral, indicated on United States Geology Survey (USGS) quadrangle maps, with the exception of man-made watercourses. The flows from the blue line stream would be accepted on to the East Project site and would be routed west along Johnson Road, then south along Navajo Road within a

channel on-site. The flow would be allowed to continue to flow south via spillway from the channel to maintain the natural drainage pattern of the existing condition.

Dry Utilities

Dry utilities serving the Project area include Southern California Edison, Southwest Gas, and various telecommunication providers. The Project would include installation of onsite dry utility infrastructure that is anticipated to connect with the existing infrastructure available in the vicinity.

C. Summary of Requested Actions

The Town of Apple Valley has the primary approval authority for the Project. As such, the Town is serving as the Lead Agency for this EIR Addendum pursuant to CEQA Guidelines Section 15050. The Town will consider the information contained in this EIR Addendum and this EIR Addendum's administrative record in its decision-making processes. In the event of approval of the Project and this EIR Addendum, the Town would subsequently issue discretionary and administrative permits to implement the Project. This EIR Addendum covers all federal, State, and local government, and quasi-government approvals which may be needed to construct or implement the Project, whether or not they are stated explicitly, or elsewhere in this EIR Addendum (CEQA Guidelines Section 15124[d]).

Local Discretionary entitlement approvals requested:

- Site Plan Review (SPR-2022-009) (West site)
- Site Plan Review (SPR-2022-010) (East site)
- Tentative Parcel Map No. 20658 (TPM No. 20658) (East site)

Federal/State/Regional Regulatory Permits:

- Lahontan Regional Water Quality Control Board (Waste Discharge Permit).
- California Department of Fish and Wildlife (Section 1602 Streambed Alteration Agreement).
- California Department of Fish and Wildlife (Incidental Take Permit for western Joshua tree).

Additionally, in the event that certain species are detected on-site through subsequent surveys (as required by Project-specific Mitigation Measures presented within Addendum Section D, *Biological Resources*) the following federal/State permits may be required:

- United Status Fish and Wildlife Service (Incidental Take Permit for desert tortoise).
- California Department of Fish and Wildlife (Incidental Take Permits for desert tortoise, Crotch's bumblebee and/or Mohave ground squirrel; Relocation Plan for desert kit fox).

III. Purpose of an EIR Addendum

In accordance with CEQA Guidelines Section 15164, a Lead Agency is required to prepare an EIR Addendum to a previously certified EIR if some changes or additions to a project are necessary, but the proposed project modifications do not require preparation of a subsequent EIR, as provided in Guidelines Section 15162. In addition, the proposed modifications cannot result in new or substantially more significant environmental impacts compared with the impacts disclosed in the previously certified EIR.

CEQA Guidelines Section 15162 states that a subsequent EIR would be required for a project if any of the following conditions exist:

1. Substantial changes to the project require major revisions to the previously certified EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified effects;

2. Substantial changes occur with respect to the circumstances under which the project is undertaken that require major revisions to the previously certified EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified effects; or

3. The availability of new information of substantial importance, which was not known or could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified, shows that the project will have one or more significant effects not discussed in the previous EIR, significant effects previously examined will be substantially more severe than shown in the previous EIR, or mitigation measures or alternatives that were previously found not to be feasible or that are considerably different from those analyzed in the previously certified EIR would substantially reduce one or more significant effects on the environment, but the project proponent declines to adopt the mitigation measure or alternative.

According to the California Environmental Quality Act Guidelines Section 15164, an Addendum to a previously certified EIR may be used if some changes or additions are necessary, but none of the conditions described in Section 15162 requiring the preparation of a subsequent Negative Declaration or EIR have occurred.

This Addendum tiers off the certified 2009 General Plan EIR since it is more recent than the 2006 NAVISP EIR. Additionally, the annexation areas are reflected within the 2009 EIR analysis. As demonstrated in the subsequent analysis, the Project would not result in substantial changes or new information that would result in new significant effects that were not previously analyzed in the 2009 EIR. The 2009 EIR analyzed the direct and physical changes in the environment that would be caused by the Town including the NAVISP; focusing on changes to land use associated with the buildout of the proposed land use plan. The Project sites are located within the Industrial – Specific Plan (I-SP) land use designation of the NAVISP. The Project would be developed consistent with the Industrial – Specific Plan (I-SP) land use designation and surrounding industrial properties, as analyzed in the 2009 EIR. As discussed in the 2009 EIR, when taking into account the existing industrial square footage since the adoption of the General Plan and cumulative industrial projects within the Town, there is a total of approximately 42,841,779 sf remaining for land designated as Industrial under the General Plan.

The Project consists of the development of three industrial warehouse buildings totaling 3,729,100 sf and will be within the remaining amount of square footage analyzed within the 2009 EIR. Since the anticipated buildout resulting from the proposed Project will be within the total buildout originally analyzed in the 2009 EIR, no revisions to 2009 EIR are required. In addition, all applicable previously adopted mitigation measures are a condition of Project approval and are incorporated herein by reference. This Addendum provides an analysis of the Project and verification that the Project will not cause environmental impacts such that any of the circumstances identified in State CEQA Guidelines Section 15162 are present.

Based on the evaluation of information provided in this EIR Addendum, no new significant impacts would occur as a result of the proposed Project, nor would there be any substantial increase in the severity of any previously identified adverse environmental impacts. Therefore, none of the conditions described in Section 15162 of the CEQA Guidelines has occurred. For this reason, an EIR addendum is the appropriate document to comply with CEQA requirements for the proposed Project.

IV. IMPACT ANALYSIS

In accordance with CEQA Guidelines §15162, the following analysis addresses each of the environmental issues analyzed in the certified 2009 EIR as compared to the potential changes in environmental impacts due to the proposed Project. Where analysis of General Plan buildout is critical and quantifiable, a comparison of the 2009 EIR and current (2024) land use calculations has been provided.

A. Aesthetics

Summary of Findings in the 2009 EIR

The Town of Apple Valley (inclusive of annexation areas) is located primarily on alluvial slopes of the Mojave River floodplain, at the southern edge of the Mojave Desert. Elevations range from approximately 2,800 feet above sea level near the Mojave River, to approximately 3,200 feet above sea level at the northeast corner of Town. The topography gradually inclines towards the Juniper Flats foothills of the San Bernardino Mountains to the south, as well as to the scattered knolls and mountains to the north and east of the Town. The Turtle and Black Mountains are located to the north of the General Plan planning area, Fairview Mountain to the northeast, and the Granite Mountains to the southeast. From these elevated topographical features, panoramic vistas exist across Apple Valley.

Uninterrupted expanses of 'wide skies' and panoramic vistas of distant mountains are natural visual resources for the region. The low-lying landscape surrounding the Town allows unobstructed, distant views in all directions, and these create a prevailing sense of openness and spaciousness.

The visual character of most parts of the General Plan planning area has been impacted to some extent by development; however, many acres of undeveloped desert lands remain.

The 2009 EIR concluded that buildout of the General Plan would result in additional visual impacts which could adversely affect surrounding viewsheds. Continued urbanization in undeveloped areas would change the natural topography and appearance of the area to a man-made built environment. Existing viewsheds may be partially

obstructed by buildings and other structures, and the present sense of open space would be diminished. Other elements of the built environment, including signage, utility infrastructure, and paved surfaces would also impact existing visual resources. However, implementation of the Town's General Plan policies and design performance standards, together with mitigation measures, would reduce potentially detrimental impacts to visual resources to less than significant levels.

Buildout of the General Plan would generate increased light and glare resulting from residential, commercial and industrial activities, while increased traffic would result in additional headlights and increased levels of illumination on local roadways. However, implementation of the Town's General Plan policies and design performance standards, together with the below 2009 EIR mitigation measures, would reduce light and glare impacts to less than significant levels.

2009 EIR Mitigation Measures

1. Signage shall be in compliance with the Town's sign ordinance and shall be limited to the minimum size, scale and number needed to provide functional information, thereby minimizing impacts on traffic safety, streetscape, scenic viewsheds and the aesthetic character of the area.

2. Compliance with the Town's performance and design standards for landscaping, building coverage and setbacks, building design and height, architectural finishes, walls, fences and utility structures will be required of all development and redevelopment projects.

3. The Town shall maintain and implement design standards which protect scenic viewsheds and enhance community cohesion. Development standards shall address signage, landscaping, setbacks, building facades, vehicular and pedestrian access and related issues.

4. The Town's performance and design standards for lighting shall be maintained and implemented.

5. In addition to being in compliance with the Town's lighting ordinance, supplementary lighting recommendations include:

    a. External lighting shall be limited to the minimum height, fewest number and lowest intensity required to provide effective levels of illumination.
    b. Every reasonable effort shall be made to reduce spillage, both to protect residential use areas from excessive levels of illumination and to preserve dark skies at nighttime.
    c. Elevated lighting, including but not limited to parking lot lighting, shall be full-cutoff fixtures.
    d. Lighting fixtures in the vicinity of the airport shall be compatible with airport operations.

6. Overhead utility lines shall be undergrounded to the greatest extent possible through the maintenance of an undergrounding program.

7. The Town shall coordinate with utility providers to assure that utility infrastructure, including water wells, substations and switching/control facilities, are effectively screened to preserve scenic viewsheds and limit visual clutter.

8. Planning and design of residential neighborhoods and street corridors shall provide distinctive and characteristic design elements, such as entry monuments and landscaping, which preserve and enhance viewsheds enjoyed from these areas.

9. All development proposed within scenic viewsheds shall be regulated to minimize adverse impacts to views and vistas.

Comparison of 2009 GP EIR vs 2024 Industrial Lands Buildout

The 2009 EIR analyzed the aesthetic impacts associated with buildout of the General Plan consistent with Land Use Element and its distribution of land uses. Since 2009, the Town has continued to build out with no significant change in the character of development. Buildings within the NAVISP and I-P land use designations have been constructed consistent with the General Plan and NAVISP standards. There have been no substantial General Plan Amendments or NAVISP amendments that would change the intensity of development or the mix of land uses within the General Plan or

annexation areas. Therefore, the impacts to aesthetics as described in the 2009 EIR have not substantially changed, and no new conditions or more significant impacts that were not known or could not have been known have occurred.

Analysis of Watson High Desert Logistics

Visual Character

The Project sites are located in a low-lying and relatively flat desert valley. As shown previously on Figure 4, *Existing Conditions*, the Project sites are currently vacant and undeveloped. The sites are surrounded by predominately by vacant, desert lands with the exception of scattered industrial and institutional development, including Big Lots, Victor Valley Community College/Victor Valley College Regional Public Safety, Walmart Distribution Center, and Fresenius Medical Care Distribution. Additionally, the Apple Valley Airport is located east and south of the Project sites. From the Project sites, there are distant views of the Turtle Mountains to the north, Silver Mountains to the west and northwest, Fairview Mountains and Granite Mountains to the east, and the Ord Mountains to the south.

All lands surrounding the site are designated for industrial uses in the NAVISP, specifically Specific Plan Industrial (I-SP), General Industrial (I-G), and Airport Industrial (I-A). The proposed Project would allow for similar land uses, patterns of development, and range of building heights as currently occur in the project area, with comparable landscaping, architectural features, and other amenities. The Project has been designed consistent with the development standards set forth in the NAVISP for Industrial land uses (I-SP), including a maximum building height, building setbacks, percent maximum building coverage, and minimum required landscaping. Table 4, *NAVISP Zoning Development Standards Consistency Analysis*, presents the Project's consistency with the NAVISP zoning development standards of I-SP.

Table 4 NAVISP Zoning Development Standards Consistency Analysis

Applicable Development Standard	Project Consistency
Industrial – Specific Plan (I-SP)	
Lot Standard: • Minimum Lot Size: 2 acres • Minimum Lot Width:100 feet • Minimum Lot Depth: 100 feet	**Consistent.** The West Project site encompasses approximately 47.7 acres, and the East Project site is approximately 152.6 acres. Additionally, both lots well exceed the minimum lot width and depth requirements.
Min. Front Setback or Street Side Setback (Feet) • Landscaping o On Central Road: Not Applicable o On Corwin Road: Not Applicable o On any other road: 15 feet • Building o On Central Road: Not Applicable o On Corwin Road: Not Applicable o On any other road: 25 feet Min. Building Rear Setback (Feet): 15 feet Min. Building Interior Side Yard Setback (feet): 0 feet	**Consistent.** The Project has been designed consistent with the minimum required building and landscaping setback.
Min. Building Setback (feet) from rock outcropping: 50 feet	**Not Applicable.** There are no rock outcroppings on or near the Project sites.
Maximum Building Coverage (%): 45%	**Consistent.** The East Project site has a building coverage of 42.63% and the West Project site has a building coverage of 44.99%. The Project would not exceed the maximum allowable building coverage.
Maximum Building Height: 50 feet	**Consistent.** The building height would be a maximum of 48 feet from the finished floor elevation to the top of roof deck. Therefore, the Project would not exceed the maximum allowable building height. Architectural features, which are not calculated as part of the maximum building height, would be a maximum of 3 feet above the roof deck.
Minimum Landscape Requirement: 5% of interior parking surface area	**Consistent.** The East Project site would provide approximately 17.91% landscape coverage and the West Project site would provide approximately 14.3% landscape coverage, exceeding the minimum landscape requirement.

As shown above, the Project has been designed consistent with the development standards set forth in the NAVISP for industrial land uses. The Project would not create any new impacts associated with views, and any impacts would be comparable to those identified in the 2009 EIR. Thus, potential impacts to scenic vistas and views associated with the Project would be less than significant.

Light and Glare

The Project sites are vacant and undeveloped and do not generate light and glare. The proposed development would increase the levels of light and glare from interior and exterior building lighting, safety and security lighting, landscape lighting, and vehicles

accessing the area. The types and sources of lighting under the proposed Project would be similar to those anticipated under the 2009 EIR and NAVISP.

Lighting and glare levels are not expected to exceed typical levels for an urban environment and would be regulated by the Town's lighting standards (Municipal Code, Chapter 9.70.020.H). Impacts associated with light and glare would be less than significant, consistent with the conclusion of the 2009 EIR.

Conclusion

The Project represents development anticipated and analyzed within the 2009 EIR. Development of the Project sites would adhere to applicable General Plan policies and NAVISP requirements. Additionally, the Project would implement the following applicable mitigation presented in the 2009 EIR.

1. Signage shall be in compliance with the Town's sign ordinance and shall be limited to the minimum size, scale and number needed to provide functional information, thereby minimizing impacts on traffic safety, streetscape, scenic viewsheds and the aesthetic character of the area.

2. Compliance with the Town's performance and design standards for landscaping, building coverage and setbacks, building design and height, architectural finishes, walls, fences and utility structures will be required of all development and redevelopment projects.

4. The Town's performance and design standards for lighting shall be maintained and implemented.

5. In addition to being in compliance with the Town's lighting ordinance, supplementary lighting recommendations include:

    a. External lighting shall be limited to the minimum height, fewest number and lowest intensity required to provide effective levels of illumination.
    b. Every reasonable effort shall be made to reduce spillage, both to protect residential use areas from excessive levels of illumination and to preserve dark skies at nighttime.

c. Elevated lighting, including but not limited to parking lot lighting, shall be full-cutoff fixtures.
d. Lighting fixtures in the vicinity of the airport shall be compatible with airport operations.

6. Overhead utility lines shall be undergrounded to the greatest extent possible through the maintenance of an undergrounding program.

Based on the preceding, the Project would not result in any new or increased aesthetic impacts that were not already considered and analyzed in the previously certified EIR.

B. Agricultural and Forestry Resources

Summary of Findings in the 2009 EIR

Historically, agricultural activities in the Town of Apple Valley have ranged from ranching to crop farming. However, in the last 50 years, agricultural activities have diminished considerably, due in part to a limited supply of irrigation water and the pressures of urbanization in the community.

The 2009 EIR described the agricultural resources in the Land Use Element of the 2009 General Plan, which allows ranching and agricultural activities in the Very Low Density Residential, Low Density Residential, Estate Residential and Estate Residential ¾ land use designations. The 2009 EIR identified four areas of land in Apple Valley designated as Farmland of Statewide Importance, according to the California Department of Conservation. These areas encompass approximately 130 acres. Two are located north of Yucca Loma Road, and west of Apple Valley Road. Two are located south of Yucca Loma Road; one immediately east of Apple Valley Road, and one south of Bear Valley Road, in the Deep Creek area. The 2009 EIR determined that about 100 acres of land designated by the State as Farmland of Statewide Importance would be lost as a result of the 2009 General Plan Update. However, the 2009 EIR determined that none of the parcels represent viable long term agricultural production lands. Impacts were deemed less than significant.

There is one Williamson Act contract in effect in the Town. The 1.8-acre parcel is owned by Liberty Utilities (formerly Apple Valley Ranchos Water Company) and was not

actively farmed at the time of the 2009 EIR. The 2009 EIR determined that, should this contract be removed, it would not represent a significant loss of agricultural land in the area due to its size and lack of long-term agricultural value. Impacts were found to be less than significant.

The 2009 EIR found impacts to agricultural resources to be less than significant with implementation of the Town's General Plan policies and Development Code, as set forth in mitigation measures below.

2009 EIR Mitigation Measures

1. The Town's Development Code shall include buffers between Very Low Density, Low Density and Estate Residential land use designations and more intense lands, in order to provide for the preservation or creation of ranching or animal raising activities in the Deep Creek area.

2. The Town shall coordinate with the Department of Conservation, Farmland Mapping and Monitoring Program, to accurately reflect farmed and farmable lands within the Town limits.

Comparison of 2009 GP EIR vs 2024 Industrial Lands Buildout

The 2009 EIR analyzed the impacts associated with buildout of the General Plan consistent with Land Use Element and its distribution of land uses. Since that time, development has occurred consistent with the General Plan. There have been no substantial General Plan Amendments that would change the intensity of development or the mix of land uses. The annexation areas, which had assigned land uses, have for the most part been added to the Town limits. Therefore, the impacts to agricultural resources as described in the 2009 EIR have not substantially changed, and no new conditions or more significant impacts that were not known or could not have been known have occurred.

Analysis of Watson High Desert Logistics

The Project sites are currently vacant and contain sparse native vegetation. No land within the Project sites is designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, as shown on maps prepared pursuant to the California

Department of Conservation (DOC) Farmland Mapping and Monitoring Program (DOC, 2022). Additionally, the Project sites are zoned I-SP and would not conflict with existing zoning for agricultural use or a Williamson Act contract. No forest land exists in the vicinity of the Project sites and no lands in the Project sites are designated for forest land production. Impacts would be less than significant.

Accordingly, the Project would not result in any new or increased agriculture/forestry resources impacts that were not already considered and analyzed in the previously certified EIR.

C. Air Quality and Greenhouse Gases

Summary of Findings in the 2009 EIR

Air Quality Emissions

The Town of Apple Valley and the annexation areas lie within the Mojave Desert Air Basin (MDAB). Local development and population growth, traffic, construction activities, and various site disturbances in the Town contribute to air quality emissions. Although air pollution is emitted from various sources locally, some of the degradation of air quality can be attributed to sources outside of the MDAB, including air basins to the west in Los Angeles County, to the southwest in Riverside County, and regionally in San Bernardino County.

The MDAB exceeds State and federal standards for fugitive dust (PM_{10} and $PM_{2.5}$) and ozone. State and federal standards for carbon monoxide, nitrogen oxides, sulfur dioxide, and lead are in attainment within the Town and the MDAB.

Pollutant emissions generated at buildout of the 2009 General Plan and annexation areas would include emissions from the use of consumer products, electricity, and natural gas, and emissions from vehicle exhaust for residential, commercial, office, and industrial land use designations as set forth in the 2009 General Plan. The 2009 EIR concluded that criteria pollutants thresholds would be exceeded as a result of buildout of the General Plan and annexation areas. Even with the application of mitigation, air quality impacts were considered significant and unavoidable.

Climate Change and Greenhouse Gases

Air quality is a concern due to human health issues, and because air pollutants are thought to be contributing to global warming and climate change. Air pollution is defined as a chemical, physical, or biological process that modifies the characteristics of the atmosphere. Some air polluting agents are also greenhouse gases (GHG), such as carbon dioxide (CO_2), methane (CH_4), nitrous oxide (N_2O), and fluorinated gases (hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride), which are released into the atmosphere through natural processes and human activities. Carbon dioxide is the primary greenhouse gas of concern due to current and projected levels, and the highly correlated temperature regression curve; temperatures rise as carbon dioxide levels rise.

The 2009 EIR determined that buildout of the General Plan and annexation areas would increase emissions, resulting in a significant impact. Even with the implementation of mitigation, the 2009 EIR determined that impacts associated with GHG emissions would be significant and unavoidable.

2009 EIR Mitigation Measures

General Measures

1. Grading and development permits shall be reviewed and conditioned to require the provision of all available methods and technologies to assure minimal air quality emissions from development. See 2009 EIR Table III-21 below.

2009 EIR Table III-21
Available Emission Reduction Technologies

	Daily Emission Reduction Factors				
Diesel Equipment	CO	NOx	SOx	PM_{10}	ROG
Aqueous Fuel	0%	14%	0%	63%	0%
Diesel Particle Filter	0%	0%	0%	80%	0%
Cooled Exhaust Gas Recirculation	90%	40%	0%	85%	90%
Lean NOx Catalyst	0%	20%	0%	0%	0%
Diesel Oxidation Catalyst	0%	20%	0%	0%	0%
Worker Trips	CO	NOx	SOx	PM_{10}	ROG
Use of Shuttle or Ride Sharing	1.3%	1.3%	1.3%	1.3%	1%

Source: Urban Emissions Model (URBEMIS2002) version 8.7.0 April 2005; developed by the California Air Resources Board (CARB) as a modeling tool to assist local public agencies with estimating air quality impacts from land use projects when preparing a CEQA environmental analysis.

2. As part of the grading permit process, developers shall concurrently submit a dust control plan as required by MDAQMD in compliance with Rule 403 (see 2009 EIR Table III-22 below).

2009 EIR Table III-22
Fugitive Dust Control Methods

Daily PM_{10} Reduction	
Apply Soil Stabilizers to Inactive Areas	30%
Replace Ground Cover in Disturbed Areas Quickly	15%
Water Exposed Surfaces 2 Times Daily	34%
Water Exposed Surfaces 3 Times Daily	50%

Source: Urban Emissions Model (URBEMIS2002) version 8.7.0, April 2005.

3. Prior to grading activities, a wind erosion control plan that among other things addresses soil stabilization techniques shall be submitted to the Apple Valley Building Division to assure that dust control is realized for all projects.

4. The Town shall conduct an initial study for all projects that are expected to exceed any of the MDAQMD pollutant emission threshold criteria, and shall require detailed air quality analyses for all development applications that have the potential to adversely affect air quality including quantification of greenhouse gas emissions. Until new factors are developed the use of the CEQA Handbook prepared by SCAQMD or other appropriate modelling tools such as URBEMIS shall be utilized.

5. All construction activities within the Town of Apple Valley shall be subject to Rule 401 Visible Emissions, Rule 402 Nuisance, and Rule 403 Fugitive Dust in accordance with the Mojave Desert Planning Area PM_{10} Attainment Plan.[3]

6. Setbacks and buffer zones shall be provided between sensitive receptors (residences, schools, daycare centers, playgrounds and medical facilities) and point source emitters, such as highways, hazardous materials sites, and industrial development. Projects proposed for sites located within the specified distance to an existing or planned (zoned) sensitive receptor land use shall be evaluated to

[3] "Final Mojave Desert Planning Area Federal Particulate Matter (PM_{10}) Attainment Plan," prepared by the Mojave Desert Air Quality Management District, July 31, 1995.

determine impacts to sensitive receptors including a health risk assessment for the following projects:

a. Any industrial project within 1000 feet;
b. A distribution center (40 or more trucks per day) within 1000 feet;
c. A transportation project with 50,000 or more vehicles per day within 1000 feet;
d. A dry cleaner using perchloroethylene within 500 feet;
e. A gasoline dispensing facility within 300 feet.

7. The General Plan Land Use Plan shall be routinely updated to assure that air pollution point sources, such as those described above, are located a sufficient distance from residential areas and other sensitive receptors, to the greatest extent practical.

8. The Town shall encourage the phasing of development projects and the staging of construction equipment to assure the lowest construction-related pollutant emission levels practical.

9. The Town shall strive to maintain a balance between housing, commercial, and industrial development, and shall encourage mixed-use development to reduce the length of vehicle trips and associated moving vehicle emissions.

10. The Town shall promote the development of pedestrian-oriented retail centers, community-wide trails, and dedicated bike lanes to encourage alternatives to vehicle travel. These components shall be integrated and periodically updated in the General Plan Circulation Element.

11. The Town shall pursue programs that create a diversified transportation system that minimizes vehicle miles traveled and associated air quality emissions.

12. The Town shall encourage the incorporation of energy-efficient design measures in site plans, including appropriate site orientation to assure solar access, and the use of shade and windbreak trees to enhance the use of alternative energy systems and reduce the need for excessive heating and cooling.

13. The Town shall encourage the use of clean burning energy sources for transportation, heating and cooling. Pilot studies and/or demonstration programs shall be initiated by the Town and/or local agencies to promote these uses. The following programs shall be pursued:

    f. Replace Town and County vehicle fleet with alternative vehicles
    g. Initiate ride sharing programs for employees and of telecommuter options
    h. Utilize Town building rooftops for placement of Solar equipment

14. The Town shall continue to develop and coordinate mass transit services that link residential, commercial, shopping and industrial centers, and shall coordinate with regional transportation authorities to facilitate public transport outside Town limits.

15. As requested, the Town shall participate, through the San Bernardino Associated Governments and MDAQMD, in the routine monitoring of all pollutants of regional concern and shall maintain records of regional air quality trends.

16. The Town shall create staff positions that emphasis the Town's commitment towards building a green and sustainable community including LEED certified personnel and interagency liaisons that work directly with the Town and utility providers to increase efficiency, initiate programs, and develop incentives for water and energy conservation and reducing air quality emissions.

17. The Town shall coordinate with MDAQMD and the nearby SCAQMD in providing air quality management training to staff and volunteers.

18. The Town shall review individual projects under CEQA using the control efficiencies provided on pages 11-13 through 11-32 of the 1993 SCAQMD "CEQA Air Quality Handbook" to determine the effectiveness of proposed air quality mitigation measures for specific projects.

19. A PM_{10} Management Plan for construction operations shall be submitted with all development proposal applications. Plans shall include dust management controls, which can reduce PM emissions as shown in the table below:

2009 EIR Table III-23
Particulate Matter Emission Reduction Techniques

Mitigation Measure	Daily Reduction Factor for PM_{10}
Apply non-toxic soil stabilizers to graded construction areas that are inactive for 10 days or more	30-65%
Replace ground cover immediately through seeding and watering	15-49%
Enclose, cover, water twice daily or apply soil binders to exposed piles with more than 5% silt content	30-74%
Water active site at least twice a day	34-68%
Water active site at least three times daily	45-85%
Cover soil haul trucks or maintain at least two feet of freeboard	7-14%
Conduct street sweeps at the end of each day	25-60%
Install wheel washers where vehicles enter and exist unpaved roads or wash off equipment leaving the site	40-70%
Enforce maximum speeds of less than 15 mph on all unpaved roads	40-70%
Pave construction roads that have more than 50 daily construction equipment trips or 150 total daily trips	92.5%
Pave construction site access roads at least 100 feet on to the site from the main road	92.5%
Pave construction roads that have less than 50 daily trips	92.5%

Source: "CEQA Air Quality Handbook," prepared by SCAQMD, 1993.

20. To reduce construction-related traffic congestion, developers and contractors shall implement the following mitigation measures:

    i. configure construction equipment parking to minimize traffic disturbance
    j. minimize obstruction of through-traffic lanes
    k. provide a flag person to ensure safety at construction sites, as necessary
    l. schedule operations affecting roadways for off-peak traffic hours
    m. provide rideshare incentives to construction personnel

21. To minimize construction equipment emissions, developers shall implement the following measures:

    n. wash off trucks leaving the site
    o. require trucks to maintain two feet of freeboard
    p. properly tune and maintain construction equipment
    q. use low sulfur fuel for construction equipment

22. To minimize indirect-source emissions, developers may:

    r. implement energy conservation measures beyond state and local requirements
    s. install low-polluting, high-efficiency appliances
    t. install solar pool and water heaters, where feasible
    u. landscape with appropriate drought-tolerant species to reduce water consumption and provide passive solar benefits
    v. install energy-efficient street lighting

23. To minimize building energy consumption, developers shall be encouraged to implement the following:

    w. improve the thermal integrity of buildings
    x. utilize window glazing, wall insulation, and efficient ventilation methods
    y. introduce efficient heating and appliances, such as water heaters, cooking equipment, refrigerators, furnaces, and boiler units
    z. incorporate appropriate passive solar design and solar heaters
    aa. use devices that minimize the combustion of fossil fuels

GHG Measures

1. Design and implement land uses that encourage job/housing proximity or easy access to transit opportunities including high density development along transit corridors, compact mixed-use projects, and urban villages that maximize affordable housing and encourage biking, walking, and the use of public transit. This can be accomplished through the implementation of the goals, policies and programs of the General Plan Medium Density Residential and Mixed Use land use designations and, as appropriate, implementation of specific plans in targeted areas where the opportunities for such development can be created through advance planning. Transit corridors to be focused on high density development are along Bear Valley Road, Highway 18, Dale Evans Parkway, Apple Valley Road, Navajo Road, Central Road, and Kiowa Road. Furthermore, high density development will be targeted for the future High Desert Corridor.

2. Encourage infill, redevelopment, mixed use, and higher density development in appropriate areas of the Town where existing development can serve as the

foundation for the creation of new urban villages. Such development would be focused around the southern portion of the Town near the major intersections of Bear Valley Road, such as its intersections with Apple Valley Road, Kiowa Road and Navajo Road. Other areas targeted for development include those along Highway 18 and Dale Evans Parkway.

3. In order to reduce vehicle miles traveled and greenhouse gas emissions, mixed use projects with a maximum density of 30 dwelling units per acre shall be developed in the core of Apple Valley on infill lots and/or adjacent to transportation corridors (such as Bear Valley Road, Highway 18, and Dale Evans Parkway) and existing and future job centers.

4. Incentive programs shall be offered for affordable Medium Density Residential infill projects (maximum 20 dwelling units per acre) within the core of Apple Valley and/or adjacent to transportation corridors and existing and proposed job centers. This will help to reduce the vehicle miles traveled and greenhouse gas emissions.

5. Infill in the Mountain Vista Neighborhood is encouraged, and incentives shall be offered by the Town for projects greater than 20 units in size. Infill and higher densities in this existing neighborhood will reduce the amount of vehicle miles traveled.

6. Mobile Home Park development shall be encouraged through the creation of the Mobile Home Park Land Use Designation. This will encourage higher density residential development along transportation corridors and adjacent to existing and future job centers. As a result, this should help reduce vehicle miles traveled and greenhouse gas emissions.

7. The Town shall encourage and promote the development of the North Apple Valley Industrial Specific Plan to create a job center with productive industries, which will reduce the vehicle miles traveled of high desert residents that typically have to drive to employment centers in the San Bernardino Valley, as well as the Riverside City and County portions of the Inland Empire for work. The Town shall reduce the approval time for entitlements and permit process for industrial projects within this

area. The industrial development also supports a broad-based economy and encourages a jobs housing balance.

8. The Town shall permit childcare facilities in single-family and multi-family residential zones, as well as, in the commercial and industrial areas where employment is concentrated. This will encourage the reduction of vehicle miles traveled.

9. New developments shall be encouraged to include housing, recreational, and retail amenities, so as to limit the number of vehicle miles traveled by providing accessible and desirable amenities onsite.

10. All new development shall be required to install infrastructure prior to occupancy, which will encourage a well-planned, orderly development pattern.

11. Advanced technology systems and effective management strategies shall be employed in order to improve the operational efficiency of transportation systems and the movement of people, goods, and services including synchronization of traffic lights and signals. New development that requires roadway and/or intersection improvements will be required to install such improvements such that these advanced traffic management systems may be easily implemented by the Town.

12. New projects shall incorporate design parameters that allow for frequent, reliable, and convenient public transit.

13. The Town shall expand and develop an integrated and comprehensive bikeway, walking path and trail system. The expansion of a regional trail system shall be in consultation with neighboring communities to improve the overall Victor Valley system.

14. Street and travel corridors shall be monitored and maintained to assure that congested areas and intersections are rectified.

15. Idling time for commercial, delivery, and construction vehicles shall be regulated and limited.

16. Landscaping designs shall use trees and other vegetation to maximize the shading of buildings in order to reduce energy requirements for heating and cooling.

17. Planting and preserving existing trees shall be utilized as means of providing carbon storage. Preserving existing trees shall be encouraged during the development review of new projects. The Town shall formulate minimum tree planting standards to be applied during the development review of a project.

18. Tree planting in parks and open spaces will be encouraged. Tree planting programs shall be implemented by the Town. These programs shall include an educational component that emphasizes the importance of trees as means of providing carbon storage.

19. The Town shall promote the use of LEED (Leadership in Energy and Environmental Design) building practices for public and private development by considering the utilization of such building practices as a factor favoring project approval during the entitlement process. Sustainable or "green" building standards similar to LEED shall also be considered favorably. Alternative energy systems such as solar, thermal, photovoltaics and other clean energy systems shall be integrated in building design. Building design shall take advantage of shade, prevailing winds and sun screen to promote energy efficiency.

20. The Town shall encourage the use of energy saving measures beyond the requirements of Title 24 for residential and commercial projects. The incorporation of such measures shall be considered as a factor in favor of project approval during the entitlement process. An incentive program shall be developed for projects that exceed Title 24 requirements by 15% and/or achieve LEED certification or similar performance standards for building design. Incentives such as fee reductions or waivers of certain development standards shall be considered.

21. Promote the use of facilities for low/zero carbon fueled vehicles in new developments, such as the charging of electric vehicles from green electricity sources.

22. The Town will encourage and facilitate the exploitation of local renewable resources by supporting public and private initiatives to develop and operate

alternative systems of electricity generation, using wind, solar and other renewable energies.

23. Promote educational programs directed at the public, schools, professional associations, businesses, and industries that offer strategies for reducing GHG emissions.

24. Initiate a program to replace existing traffic lights, street lights, and other electrical uses to energy efficient bulbs and appliances. Encourage new lighting to be energy efficient. The Town shall require that lighting in all Town facilities be replaced with energy efficient fixtures as existing fixtures fail and require replacement.

25. Utilize Energy Star equipment and appliances for new development and encourage replacement appliances to be energy efficient. The voluntary commitment to such a requirement by project applicants shall be considered a factor in favor of project approval.

26. Promote the use of on-site renewable energy production including installation of photovoltaic cells or other solar options. The Town shall encourage the use of solar cells in private development and consider such project features favorably during project review. The Town shall investigate the cost effectiveness of installing such solar cells on Town buildings for the purposes of powering Town facilities and possibly selling excess "clean" energy back to the SCE power grid, pursuant to state law.

27. Consider an Energy Savings Performance Contract with a private entity to retrofit public buildings, which will allow the private entity to fund all energy improvements in exchange for a share of the energy savings over a period of time.

28. Utilize the Collaborative for High Performance Schools (CHPS) best practices for school design, building, and operation.

29. Replace or retrofit municipal water and wastewater systems with energy efficient motors, pumps, and other equipment, and recover wastewater treatment methane for energy production.

30. Capture and utilize landfill gas for use as an energy source including fuel for vehicles, operating equipment, and heating buildings.

31. Promote the use of vehicles and buses that use alternative fuels or technologies such as hybrids, biodiesel, and ethanol. The Town's vehicle fleet shall be transitioned to alternative fuels to the extent economically feasible.

32. The Town shall promote the use of mass transit services, coordinating with all agencies to link residential and commercial businesses and employment centers within the Town's residential neighborhoods and nearby communities. Mass transit services shall be expanded as needed within the context of economic feasibility.

33. Ride sharing, carpooling, flexible work scheduling, telecommuting and Park & Ride programs shall be encouraged for public and private employers.

34. The Town shall assess the local transportation system annually with a view to gaining greater efficiency in the movement of people and goods through the community. Opportunities to expand the public transit system, using buses equipped with bicycle racks and fueled by compressed natural gas or hydrogen will be maximized. Widespread use of pedestrian pathways and alternative means of transportation, such as bicycles and electric hybrid vehicles will be facilitated and encouraged.

35. Offer incentives to private businesses for developing energy and water efficient features and building materials, such as expedited plan checks and reduced permit fees.

36. Offer rebates and low interest loans to residents that make energy saving improvements on their homes, including but not limited to the installation of solar cells and panels.

37. Incentives shall be provided for rehabilitation and remodeling of existing development. Assistance from the Town shall be provided through the Residential Rehabilitation Loan Program to improve energy efficiency of existing residences. Educational materials shall be provided to the public advising them of energy

efficiency through available appliance programs and other energy conservation improvements that are eligible for the Residential Rehabilitation Loan Program.

38. The Town shall consider incentive programs, rebates and refunds for the use of energy efficient appliances, windows and building designs for new and remodeled structures. The incentive program could also include incentives for the use of recycled materials.

39. Encourage bicycle lanes and walking paths directed to the location of schools, parks, and other destination points. The provision of such facilities will be considered favorably during project review pursuant to the General Plan's Circulation Element.

40. The Town will implement a program to install photo voltaic systems on the buildings and carports located at the Public Works facility and Town Hall/Police Department, which will provide electricity for the Civic Center and the Public Works/Animal Control facilities. This will improve the energy efficiency of these facilities.

41. Prior to July 15, 2010, the Town shall develop and adopt a Climate Action Plan ("CAP") that enhances the General Plan's goals, policies and programs relating to meeting the greenhouse gas emission targets established in the California Global Warming Solutions Act, including reducing emissions to 1990 levels by including an emissions inventory; emission targets that apply at reasonable intervals through the life of the plan; enforceable GHG control measures; monitoring and reporting; and mechanisms to allow for the revision of the plan, if necessary, to stay on target. The goal of the CAP shall be to reduce greenhouse gas emissions within the Town's control the achieve the emission reduction goals required by AB 32, as further developed and quantified by the California Air Resources Board. The CAP shall quantify the approximate greenhouse gas emissions reductions of each measure developed with the CAP, and shall consider the mechanisms, strategies and techniques included above.

Comparison of 2009 GP EIR vs 2024 Industrial Lands Buildout

Information presented in the following discussions is summarized from:

- *Watson High Desert Logistics Air Quality & Greenhouse Gas Assessment* (Urban Crossroads, Inc.), February 6, 2025.

The Air Quality & Greenhouse Gas Assessment is presented as *Appendix A* to this Addendum. The Assessment compared the regional emissions anticipated by the 2009 EIR ("Baseline Condition") with a "Current Cumulative Condition." The Current Cumulative Condition includes all currently developed projects, vacant land, and planned industrial projects in 2024 within the Town of Apple Valley. These projects (high-cube warehouse and warehouse distribution facilities) generate emissions somewhat differently than the general light industrial and industrial park categories assumed as part of the 2009 EIR.

Consistent with CEQA requirements for an EIR Addendum, the Project must not result in new or substantially more significant environmental impacts compared with the impacts disclosed in the 2009 EIR.

Baseline Condition

The Baseline Condition assumes the buildout of the General Plan. The analysis used within the 2009 EIR was completed using an emissions model (Urbemis) that is no longer used for such an analysis. The 2007 Urbemis model used at the time of the 2009 EIR and utilizes EMFAC2007 (a model developed by the CARB for estimating on-road vehicle emissions), which is now outdated. As such, the California Air Pollution Control Officers Association (CAPCOA) in conjunction with other California air districts, including SCAQMD, released CalEEMod 2022 which incorporates the latest EMFAC2021 model, along with updated data on energy consumption, land use, and transportation factors. It also accounts for various project-specific characteristics such as building design, transportation infrastructure, and project trip generation, ensuring that the emissions estimates reflect current industry standards and regulatory requirements. CalEEMod 2022 continues to evolve, leveraging the most recent scientific data and policy updates to support compliance with California's environmental regulations, including CEQA.

Notwithstanding, to provide an accurate comparison for both Conditions, air quality emissions were recalculated utilizing the latest California Emissions Estimator Model (CalEEMod). To simulate 2009 conditions using the new CalEEMod model, the same assumptions for the industrial land use mix, landscaping coverage, energy demand, water demand, truck and passenger vehicle trip lengths utilized in the 2009 EIR were used. Table 5, *Baseline Condition: 2009 General Plan Buildout, Regional Operational Air Quality Emissions* and Table 6, *Baseline Condition: 2009 General Plan Buildout, GHG Emissions* show the regional air quality emissions and GHG emissions, respectively, associated with the Baseline Condition.

Table 5 Baseline Condition: 2009 General Plan Buildout, Regional Operational Air Quality Emissions

	Emissions (lbs/day)						
	VOC	**NO_x**	**CO**	**SO_X**	**PM_{10}**	**$PM_{2.5}$**	**CO2e**
Total Maximum Daily Emissions	2,968	7,915	13,389	63	3,327	1,012	8,068,716

Source: Urban Crossroads, 2025a.

Table 6 Baseline Condition: 2009 General Plan Buildout, GHG Emissions

	Total $MTCO_2e/yr$
GHG Emissions	1,060,501.97

Source: Urban Crossroads, 2025a.

Current Cumulative Condition

The Current Cumulative Condition assumes the buildout of all currently developed projects, vacant land, and planned industrial projects (including the Project) in 2024 within the Town of Apple Valley, which more accurately represents current conditions compared to the 2009 EIR. Table 7, *Current Cumulative Condition: Regional Operational Air Quality Emissions* and Table 8, *Current Cumulative Condition: GHG Emissions* show the regional air quality emissions and GHG emissions, respectively, associated with the Current Cumulative Condition.

Table 7 Current Cumulative Condition: Regional Operational Air Quality Emissions

	Emissions (lbs/day)						
	VOC	NO_x	CO	SO_X	PM_{10}	$PM_{2.5}$	CO2e
Total Maximum Daily Emissions	2,242	3,481	7,307	42	2,867	824	5,453,750

Source: Urban Crossroads, 2025a.

Table 8 Current Cumulative Condition: GHG Emissions

	Total $MTCO_2e/yr$
GHG Emissions	716,280.52

Source: Urban Crossroads, 2025a.

As shown in the preceding tables, the Current Cumulative Condition generates less emissions for all criteria pollutants and GHG emissions when compared to emissions generated by the Baseline Condition assumed within the 2009 EIR.

Analysis of Watson High Desert Logistics

Air Quality Management Plan Consistency

The Project is located within the MDAB, which is governed by the Mojave Desert Air Quality Management District (MDAQMD). The MDAQMD is responsible for monitoring criteria air pollutant concentrations and establishing management policies for the MDAB. All development within the MDAB, including the proposed Project, is subject to all applicable air quality management plans that establish control strategies and guidance on regional emission reductions for air pollutants. MDAQMD has created guidelines and requirements to conduct air quality analyses. The MDAQMD's current guidelines, included in its California Environmental Quality Act and Federal Conformity Guidelines (August 2011), were adhered to in the assessment of air quality impacts for the proposed Project.

Consistency with air quality management plans (AQMPs) can be assumed if a project is consistent with the growth forecasts used as the basis of the AQMP. Conformity with growth forecasts can be established by demonstrating that a project is consistent with the land use plan that was used to generate the growth forecast. The Project sites are designated as Industrial – Specific Plan, which allows for a broad range of manufacturing and warehousing uses, such the Project. The Project is consistent with the land use and zoning designation established in the NAVISP and will comply with

the policies and regulations applicable to this designation. Given that the Project is consistent with the land use plan used to generate the growth forecast, it can be assumed that the Project conforms with the growth forecast itself.

Additionally, according to the Apple Valley General Plan, the Town is subject to the provisions of the MDAQMD Rule Book, which establishes policies and other measures designed to help the District reach federal and State attainment standards. In accordance with the Towns policies, the proposed Project would comply with the provisions of the MDAQMD Rule Book. These actions include the implementation of fugitive dust control measures (Rule 403) and the use of low VOC content architectural coatings (Rule 1113). Furthermore, the Project will be subject to Rule 201, which requires a permit from the Air Pollution Control Office prior to any construction activities, and Rule XIII, which requires pre-construction review of all new facilities to ensure they do not interfere with the attainment and maintenance of ambient air quality standards. Compliance with the MDAQMD's requirements will ensure that the Project does not conflict with applicable air quality plans.

Regional Emissions

Operational activities associated with the proposed Project would result in emissions of VOCs, NO_X, CO, SO_X, PM_{10}, and $PM_{2.5}$. Operational related emissions are expected from the following primary sources: area source emissions, energy source emissions, and mobile source emissions. Additionally, due to the speculative nature of the Project, in order to provide a conservative analysis, cold storage has been included within the analysis to account for potential future tenant needs.[4]

The Project related operational air quality impacts derive primarily from vehicle trips generated by the Project. Trip characteristics available from the Watson High Desert Logistics Traffic Analysis (*Appendix J2*) were utilized in this analysis. The Project would generate a total of 6,754 daily trips, including 5,892 passenger car vehicles per day and 862 truck trips per day. For passenger car vehicles CalEEMod default trip lengths were used and assuming that warehouse developments generate longer truck trips associated with product delivery/distribution, modeling for truck trips assumed a 40-mile trip length[5] with an assumption of 100% primary trips for the proposed

[4] Cold storage was analyzed assuming 15% of the total Project square footage (3,729,100 × 0.15 = 559,365).
[5] The 40-mile trip length is the current basis for the SCAQMD's Warehouse Actions and Investments to Reduce Emissions (WAIRE) Program.

industrial land uses. The estimated operational-source emissions from the Project are summarized in Table 9, *Regional Operational Emissions.*

Table 9 Regional Operational Emissions

Source	Emissions (lbs/day)					
	VOC	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Summer						
Mobile Source	29.18	132.36	333.70	1.77	102.40	28.31
Area Source	109.10	1.36	162.18	0.01	0.29	0.22
Energy Source	1.11	20.14	16.92	0.12	1.53	1.53
Total Maximum Daily Emissions	**139.39**	**153.87**	**512.81**	**1.90**	**104.22**	**30.06**
MDAQMD Regional Threshold	137	137	548	137	82	65
Threshold Exceeded?	YES	YES	NO	NO	YES	NO
Winter						
Mobile Source	26.81	140.19	259.90	1.71	102.40	28.31
Area Source	82.47	0.00	0.00	0.00	0.00	0.00
Energy Source	1.11	20.14	16.92	0.12	1.53	1.53
Total Maximum Daily Emissions	**110.369**	**137.01**	**276.82**	**1.83**	**103.93**	**29.84**
MDAQMD Regional Threshold	137	137	548	137	82	65
Threshold Exceeded?	NO	YES	NO	NO	YES	NO

Source: Urban Crossroads, 2025a

Although the Project would exceed thresholds established by the MDAQMD, as shown above, the 2009 EIR identified a significant and unavoidable impact (page III-30, table III-16 of the 2009 EIR). Additionally, as summarized on 0, *Buildout Emissions vs. Project Regional Air Quality Emissions*, the proposed Project compared to the 2009 GP EIR emissions is anticipated to generate less emissions per day and would be within the total emission for pollutants of VOC, NO_X, CO, SO_X, PM_{10}, and $PM_{2.5}$ and no new impacts would occur. The Project would not result in any new or more significant impacts than were previously disclosed in the 2009 EIR.

Table 10 Buildout Emissions vs. Project Regional Air Quality Emissions

	Emissions (lbs/day)					
	VOC	**NO_X**	**CO**	**SO_X**	**PM_{10}**	**$PM_{2.5}$**
Project	139	154	513	2	104	30
Baseline Condition	2,968	7,915	13,389	63	3,327	1,012
Net Emissions	***-2,828***	***-7,761***	***-12,876***	***-61***	***-3,223***	***-982***

Source: Urban Crossroads, 2025a

Odors

Land uses generally associated with odor complaints include uses such as agricultural uses (livestock and farming), wastewater treatment plants, food processing plants, chemical plants, composting operations, refineries, landfills or dairies. The Project does not contain land uses typically associated with emitting objectionable odors. Potential odor sources associated with the proposed Project may result from construction equipment exhaust and the application of asphalt and architectural coatings during construction activities and the temporary storage of typical solid waste (refuse) associated with the proposed Project's (long-term operational) uses. Standard construction requirements would minimize odor impacts from construction. The construction odor emissions would be temporary, short-term, and intermittent in nature and would cease upon completion of the respective phase of construction.

Project-generated refuse would be stored in covered containers and removed at regular intervals, in compliance with current solid waste regulations. The proposed Project would also be required to comply with MDAQMD Rule 402 to prevent occurrences of public nuisances. The Project would therefore not create objectionable odors affecting a substantial number of people.

Greenhouse Gas Emissions

The Air Quality & Greenhouse Gas Assessment calculated the GHG emissions anticipated from construction and operation of the Project, as presented in 0, *Project GHG Emissions*. It is noted that the MDAQMD follows the SCAQMD recommendation in calculating the total GHG emissions for construction activities by amortizing the emissions over the life of the Project by dividing it by a 30-year project life then adding that number to the annual operational phase GHG emissions. As such, construction

emissions were amortized over a 30-year period and added to the annual operational phase GHG emissions.

The Town of Apple Valley has not adopted its own numeric threshold of significance for determining impacts relating to GHG emissions, therefore, Project GHG emissions were compared to the MDAQMD threshold of 90,718.5 MTCO2e. As shown below, the Project would not exceed the MDAQMD threshold.

Table 11 Project GHG Emissions

Source	Emission (MT/year)				
	CO_2	CH_4	N_2O	Refrigerants	Total CO_2e
Annual construction-related emissions amortized over 30 years	210.73	3.65E-03	1.47E-02	2.40E-01	215.44
Mobile	21,640.71	0.31	2.26	27.57	22,349.02
Area	54.45	0.00	0.00	0.00	54.65
Energy	8,349.92	0.77	0.06	0.00	8,386.42
Water	1,075.05	28.13	0.68	0.00	1,979.67
Waste	312.77	31.26	0.00	0.00	1,094.29
Refrigerants	0.00	0.00	0.00	94.39	94.39
Total CO_2e (All Sources)	**34,173.88**				

Source: Urban Crossroads, 2025a

It should be noted that the MDAQMD threshold has not been formally adopted, therefore, the Project's GHG emissions were also analyzed using the SCAQMD significance threshold. The current SCAQMD thresholds consist of the following tiered approach:

- Tier 1 consists of evaluating whether or not the project qualifies for any applicable exemption under CEQA.

- Tier 2 consists of determining whether the project is consistent with a GHG reduction plan. If a project is consistent with a qualifying local GHG reduction plan, it would not result in a significant GHG impact. The SCAQMD tier 2 threshold is consistent with CEQA Guidelines 15064.4 and 15183.5.

- Tier 3 consists of screening values, which the lead agency can choose, but must be consistent with all projects within its jurisdiction. A project's construction emissions are averaged over 30 years and are added to the project's operational emissions. Although this Tier proposed specific screening thresholds for residential/commercial, industrial, and mixed use, they were never adopted by SCAQMD.

- Tier 4 has the following options:

    - Option 1: Reduce Business-as-Usual (BAU) emissions by a certain percentage; this percentage is currently undefined.

    - Option 2: Early implementation of applicable AB 32 Scoping Plan measures

    - Option 3: 2020 target for service populations (SP), which includes residents and employees: 4.8 MTCO2e per SP per year for projects and 6.6 MTCO2e per SP per year for plans;

    - Option 3, 2035 target: 3.0 MTCO2e per SP per year for projects and 4.1 MTCO2e per SP per year for plans

- Tier 5 involves mitigation offsets to achieve target significance threshold.

Of the above, Tier 2 applies to the Project. As such, the Project was evaluated for consistency with the Town of Apple Valley's Climate Action Plan (CAP). According to Tier 2, if the Project is determined to be compliant with the applicable greenhouse gas reduction plan, then impacts related to the greenhouse gas emissions resulting from that Project are less than significant.

The CAP provides a framework for reducing GHG emissions and managing resources to best prepare for a changing climate. The CAP recommends GHG emissions targets that are consistent with the reduction targets of the State of California and presents a number of strategies that will make it possible for the Town to meet the recommended targets. Projects that demonstrate consistency with the strategies, actions, and emission reduction targets contained in the CAP would have a less than significant impact on climate change. The CAP aims to achieve a 2030 target of 40% below 2005 emissions and based on growth factors provided by SCAG. The GHG emissions in 2030 would

need to be 449,347 MTCO2e, or 5.32 MTCO2e per capita in order to achieve this goal. 0, *Project Emissions and CAP Reduction Target* summarizes the total annual emissions from the Project and existing 2030 forecasts.

Table 12 Project Emissions and CAP Reduction Target

Scenario/Target	Forecast ($MTCO_2e$)	Population	MTCO2e per capita per year
CAP 2030 forecast w/CAP measures[1]	410,922.00	84,535	4.86
Project emissions (per year)	34,173.88	84,535	--
Total	**445,095.88**	**84,535**	**5.27**
CAP 2030 target (40% below baseline)	449,347.001	84,535	5.32
Threshold Exceeded?			**NO**

Source: Urban Crossroads, 2025a
[1] The 2030 emissions forecast accounts for community emissions, including industrial projects and therefore already considers the Projects emissions within the CAP 2030 emission forecasts. Regardless, to provide a conservative analysis, the Projects emissions were added to the existing CAP 2030 emissions forecasts.

As shown, both the Project total and per capita emissions would meet the CAP 2030 emission target of 40% below the 2005 baseline by 2030. As such, the Project would meet the Town of Apple Valley CAP greenhouse gas emissions reduction targets.

To ensure consistency with applicable CAP consistency measures, Mitigation Measures GHG-1 and GHG-2 shall be implemented, as presented below.

GHG-1 Establish an employee carpooling program, including incentives (preferred parking, flex time incentives, etc.) for participating employees.

GHG-2 Provide employees with free or discounted public transit passes.

As demonstrated above, the Project would not exceed MDAQMD or SCAQMD thresholds. The Air Quality & Greenhouse Gas Assessment also concluded that the Project would not conflict with other GHG regulations such as the 2022 CARB Scoping Plan and the SCAG 2020-2045 Regional Transportation Plan/Sustainable Community Strategy (RTP/SCS).[6]

[6] It should be noted that although the 2050 RTP/SCS is the most current document, the 2045 RTP/SCS factors were used in the analysis, as they were used during CAP development and are more conservative than the current 2050 RTP/SCS factors.

Additionally, summarizing the comparative analysis presented previously, Table 13, *Buildout Emissions vs. Current Cumulative GHG Emissions*, presents a comparison of GHG emissions assumed under the 2009 EIR (Baseline Condition) to that of all currently developed, vacant, and planned industrial projects (Current Cumulative Condition).

Table 13 Buildout Emissions vs. Current Cumulative GHG Emissions

	Total $MTCO_2e/yr$
Baseline Condition GHG Emissions	1,060,501.97
Current Cumulative Condition GHG Emissions	716,280.52
Net Emissions	(344,221.46)

Source: Urban Crossroads, 2025a.

As shown above, the Current Cumulative Condition generates less GHG emissions than was assumed in the 2009 EIR. The Project represents industrial development consistent with existing land use designations and assumed by the 2009 EIR. As such, Project-generated GHG emissions are fully represented within the envelope of emissions assumed within the 2009 EIR analysis. The Project would not result in any new or more significant impacts than were previously disclosed in the 2009 EIR.

Conclusion

Based on the preceding analysis, emissions resulting from the Project were identified and addressed within the 2009 EIR. Additionally, the Project would implement the following applicable mitigation presented in the 2009 EIR.

General Measures

1. Grading and development permits shall be reviewed and conditioned to require the provision of all available methods and technologies to assure minimal air quality emissions from development. See 2009 EIR Table III-21.

2. As part of the grading permit process, developers shall concurrently submit a dust control plan as required by MDAQMD in compliance with Rule 403. See 2009 EIR Table III-22.

3. Prior to grading activities, a wind erosion control plan that among other things addresses soil stabilization techniques shall be submitted to the Apple Valley Building Division to assure that dust control is realized for all projects.

5. All construction activities within the Town of Apple Valley shall be subject to Rule 401 Visible Emissions, Rule 402 Nuisance, and Rule 403 Fugitive Dust in accordance with the Mojave Desert Planning Area PM^{10} Attainment Plan.

19. A PM_{10} Management Plan for construction operations shall be submitted with all development proposal applications. Plans shall include dust management controls, which can reduce PM emissions.

20. To reduce construction-related traffic congestion, developers and contractors shall implement the following mitigation measures:

    a. configure construction equipment parking to minimize traffic disturbance
    b. minimize obstruction of through-traffic lanes
    c. provide a flag person to ensure safety at construction sites, as necessary
    d. schedule operations affecting roadways for off-peak traffic hours
    e. provide rideshare incentives to construction personnel

21. To minimize construction equipment emissions, developers shall implement the following measures:

    a. wash off trucks leaving the site
    b. require trucks to maintain two feet of freeboard
    c. properly tune and maintain construction equipment
    d. use low sulfur fuel for construction equipment

22. To minimize indirect-source emissions, developers may:

    a. implement energy conservation measures beyond state and local requirements
    b. install low-polluting, high-efficiency appliances
    c. install solar pool and water heaters, where feasible

d. landscape with appropriate drought-tolerant species to reduce water consumption and provide passive solar benefits
e. install energy-efficient street lighting

23. To minimize building energy consumption, developers shall be encouraged to implement the following:

a. improve the thermal integrity of buildings
b. utilize window glazing, wall insulation, and efficient ventilation methods
c. introduce efficient heating and appliances, such as water heaters, cooking equipment, refrigerators, furnaces, and boiler units
d. incorporate appropriate passive solar design and solar heaters
e. use devices that minimize the combustion of fossil fuels

GHG Measures

10. All new development shall be required to install infrastructure prior to occupancy, which will encourage a well-planned, orderly development pattern.

11. Advanced technology systems and effective management strategies shall be employed in order to improve the operational efficiency of transportation systems and the movement of people, goods, and services including synchronization of traffic lights and signals. New development that requires roadway and/or intersection improvements will be required to install such improvements such that these advanced traffic management systems may be easily implemented by the Town.

12. New projects shall incorporate design parameters that allow for frequent, reliable, and convenient public transit.

15. Idling time for commercial, delivery, and construction vehicles shall be regulated and limited.

16. Landscaping designs shall use trees and other vegetation to maximize the shading of buildings in order to reduce energy requirements for heating and cooling.

17. Planting and preserving existing trees shall be utilized as means of providing carbon storage. Preserving existing trees shall be encouraged during the development review of new projects. The Town shall formulate minimum tree planting standards to be applied during the development review of a project.

19. The Town shall promote the use of LEED (Leadership in Energy and Environmental Design) building practices for public and private development by considering the utilization of such building practices as a factor favoring project approval during the entitlement process. Sustainable or "green" building standards similar to LEED shall also be considered favorably. Alternative energy systems such as solar, thermal, photovoltaics and other clean energy systems shall be integrated in building design. Building design shall take advantage of shade, prevailing winds and sun screen to promote energy efficiency.

21. Promote the use of facilities for low/zero carbon fueled vehicles in new developments, such as the charging of electric vehicles from green electricity sources.

25. Utilize Energy Star equipment and appliances for new development and encourage replacement appliances to be energy efficient. The voluntary commitment to such a requirement by project applicants shall be considered a factor in favor of project approval.

33. Ride sharing, carpooling, flexible work scheduling, telecommuting and Park & Ride programs shall be encouraged for public and private employers.

When compared to the 2009 EIR, no new significant, substantially increased, or substantially different air quality or greenhouse gas impacts would occur as a result of the Project. No changed or new information has been identified to indicate that any potential impacts resulting from the Project would be different from those previously identified and addressed in the Certified EIR.

D. Biological Resources

Summary of Findings in the 2009 EIR

The 2009 EIR included a comprehensive analysis of special-status and sensitive species, local habitats and vegetation communities, and jurisdictional waters in the General Plan area and annexation areas.

Special Status Species

The 2009 EIR determined that the planning area contains a wide range of special status species that are designated as sensitive, threatened, or endangered by federal and State governmental agencies. Those reported in the planning area include the following:

Sensitive Plant Species

- Booth's Suncup
- Desert Cymopterus
- Joshua Tree
- Southern Skullcap

Sensitive Invertebrate Species

- San Emigdio Blue Butterfly
- Victorville Shoulderband

Sensitive Reptile Species

- Common Chuckwalla
- Desert Tortoise
- Western Pond Turtle

Sensitive Mammal Species

- Sensitive Mammal Species:
- Mojave River Vole
- Pallid San Diego Pocket Mouse
- Hoary Bat

Sensitive Bird Species

- Bendire's Thrasher
- Brown-Crested Flycatcher
- Burrowing Owl
- Cooper's Hawk
- Least Bell's Vireo
- Le Conte's Thrasher
- Prairie Falcon
- Southwestern Willow Flycatcher
- Summer Tanager
- Swainson's Hawk
- Vermillion Flycatcher
- Western Yellow-billed Cuckoo
- Yellow-breasted Chat
- Yellow Warbler

Wetlands, Riparian Habitats, and other Sensitive Natural Communities

The 2009 EIR determined that wetlands in Apple Valley were limited to the western edge of Town and associated with the Mojave River. Riparian areas include the Mojave River, Knolls Wash and Bell Mountain Wash. Sensitive native communities identified in the 2009 EIR include Mojave Riparian Forest and Joshua Tree Woodland, as well as native communities associated with a number of dry washes identified throughout the Town.

Wildlife Movement or Nursery Sites

Wildlife movement and nursery sites in Town are primarily associated with the Mojave River area. A number of bird species, including Swainson's hawk and several warbler and flycatcher species use the River as part of their migratory pathway. Its dense riparian vegetation provides habitat for a number of species.

Local Policies and Adopted Habitat Conservation Plans

The 2009 EIR identified several local and regional plans and policies relating to biological resources, including the Town's draft Multiple Species Habitat Conservation Plan, the West Mojave Habitat Conservation Plan and the Town's native plant ordinance.

Conclusion

The 2009 EIR found that although buildout of the General Plan (including the annexation areas) could significantly impact biological resources; mitigation measures imposed on future development would reduce these impacts to less than significant levels.

Mitigation Measures

1. (a) The Town shall aid the County of San Bernardino and other participating federal, state, and local agencies in the preparation of a private lands counterpart to the West Mojave Habitat Conservation Plan.

   (b) The Town shall participate in the provision of biological resources data and/or surveys relevant to open space areas within its jurisdiction and sphere of influence that may have biological resources value and shall participate in the preparation of

a Habitat Conservation Plan that addresses the needs of the Town with regard to regional biological resources.

(c) If a Habitat Conservation Plan is formulated by the participating federal, state, and local agencies that allows for the conservation of biological resources, the Town shall implement it.

2. The Town shall complete the preparation of the Apple Valley MSHCP, in conjunction with the California Department of Fish & Game ("CDFG") and the U.S. Fish and Wildlife Service ("USFWS"). Upon the completion of the MSHCP to the satisfaction of all three parties, the Town shall proceed to implement it according to its terms and the authorization for take of special status species granted by CDFG and USFWS.

3. (a) The Town shall require that biological resources evaluations be performed prior to development actions, including site-specific surveys utilizing specified survey parameters as required for all special status species in identified habitat areas, and especially within or adjacent to linkage corridors or special survey areas and potential jurisdictional areas.

   (b) As required by CEQA, if biological resources are present that would be significantly impacted by a project, mitigation shall be imposed on the project to reduce the impact to a level of less than significant, to the extent feasible.

   (c) At the General Plan-level, it is not practical to formulate or list the entire range of specific mitigation measures that can be required for individual projects. Therefore, this identification can only be done at the project-level, based on the Town's judgment of the individual circumstances of the project before it as a lead agency under CEQA. However, it can be generally stated that the Town shall require mitigation pursuant to species- or resource-specific protocols established by CDFG, USFWS, and/or the U.S. Army Corps of Engineers. The Town can also require, as appropriate, transplantation or seed collection programs, trapping and removal of wildlife, preservation of offsite habitat, recreation of habitat, or participation in a mitigation bank.

4. The Town shall ensure that land actions require site-specific nest surveys for the presence of migratory birds in accordance with established protocols and requirements of the Migratory Bird Treaty Act, prior to site disturbance. If protected migratory birds and/or raptors are found to be nesting onsite, construction activities will not be allowed within a radius of the nest determined by a qualified biologist, until the young have fledged and left the nest.

5. Biological surveys for Burrowing Owls and Prairie Falcons shall be performed for any site proposed for development wherever sufficient open space and suitable habitat is present. Coordination with California Department of Fish and Game is required when survey results are positive.

6. Biological surveys for bats shall be performed prior to disturbance on projects involving reconstruction of bridges, demolition of abandoned buildings, and/or have the potential to contain old mines, in order to determine if significant roosts are present. If roosts are present, projects shall comply with applicable protocols of the Department of Fish and Game or US Wildlife Service, and the recommendations of qualified biologists.

7. The Town shall utilize land use designations that provide for Open Space in order to protect viable habitat within the Town. On lands not already designated as Open Space where viable habitat occurs, such lands shall be considered for an open space land use designation as appropriate. Open Space lands shall be managed as warranted for the preservation and protection of their biological and natural resources.

8. The Town shall retain the Open Space designation along the Mojave River to ensure that important riparian habitat and linkages are conserved.

9. To conserve the natural state of existing hillsides and slopes, land greater than 15% slope shall not be built upon and shall be used as open space.

10. Open space land shall be protected in perpetuity.

11. Development proposals adjacent to open space lands shall provide buffers and linkages to maintain natural resource values.

12. Groundwater shall be conserved to reduce overdraft and retain or increase the depth of the water table along the Mojave River, which will help to preserve and restore plant communities within and adjacent to the waterway.

13. Development projects proposing to alter or impact major drainages (blueline streams) including ephemeral streams, shall consult with the appropriate state and/or federal regulatory agency. Such alteration may require permits from the U.S. Army Corps of Engineers, Lahontan Regional Water Quality Control Board, and/or the California Department of Fish and Game. Compliance with such permits will ensure that impacts to riparian habitat are mitigated by either restoration or replacement, and that impacts to water quality are avoided by compliance with Section 401 of the Clean Water Act requirements.

14. The Town shall promote the use of native vegetation for landscaping to enhance and create viable habitat for local species. The Town shall periodically update a comprehensive list of plant materials that are complementary with the local environment. This list shall include native and non-native, drought tolerant trees, shrubs and groundcover. The Town shall also maintain a list of prohibited plant materials. Both lists shall be made available to developers and residents. The use of native vegetation in project submissions shall be given preference over water-intensive landscaping during project design review.

15. The Town shall require developers to recover, preserve, or utilize native vegetation within their project or shall require that viable vegetation is transplanted to other appropriate sites in conformance with its Native Plant Ordinance. The Town shall make information on salvaging and transplanting native species available to developers.

16. The Town shall provide and maintain a comprehensive interconnected recreational trail system suitable for bicycles, equestrians and/or pedestrians. This will encourage the reduction of vehicle miles traveled and also provide corridors for animal migration between habitat areas. The Town shall encourage multiple use corridors through the drainage channels and utility easements, thereby encouraging the connectivity of natural communities.

17. The Town shall continue to promote biodiversity by protecting natural communities with high habitat value, protecting habitat linkages to prevent further fragmentation, and encouraging an appreciation for the natural environment and bio resources.

Comparison of 2009 GP EIR vs 2024 Industrial Lands Buildout

Information presented in the following discussions is summarized from:

- *Biological Resources Assessment for the Watson High Desert Logistics Project East & West Sites, Town of Apple Valley, California* (FirstCarbon Solutions) January 17, 2025.

The Biological Resources Assessment is presented as *Appendix B* to this Addendum. In summary, the natural vegetation community and disturbed areas were noted, including roads, off-road vehicle movement, and semi-truck parking throughout the East Project site and along a single road along the northern boundary of the West Project site. The vegetation community and land cover types on the Project site provide habitat for wildlife species that are tolerant of desert climate. Wildlife species identified during the general biological survey are described in detail in Section 4.2.2 of the Biological Resources Assessment (*Appendix B*). Wildlife activity during the general biological survey was low and few species were observed.

The 2009 EIR analyzed the biological resource impacts associated with buildout of the Town consistent with the General Plan. Since that time, there have been no substantial General Plan Amendments that would change the intensity of development or the mix of land uses. As such, impacts on biological resources as described in the 2009 EIR have not substantially changed, and no new conditions or more significant impacts that were not known, or could not have been known have occurred.

Analysis of Watson High Desert Logistics

The Project would result in the disturbance of approximately 200 acres of land in the northern portion of the NAVISP, as well as the extension of utilities and paving within existing roadways. These lands have been within Town limits for a number of years and were included in the analysis area covered in the 2009 EIR for the General Plan.

As required by the 2009 General Plan EIR Mitigation Measure 3, a biological resources assessment was prepared for the Project sites. The Biological Resources Assessment included general biological surveys, focused surveys for rare plants, western Joshua tree, desert tortoise, burrowing owl, and a jurisdictional delineation.

Current Conditions

The Project sites contain approximately 199.89 acres of *Larrea tridentata* Shrubland Alliance (Creosote Bush Scrub), which is dominated by creosote bush (*Larrea tridentata*) in the shrub canopy, with cheese bush (*Ambrosia salsola*), white bur-sage (*Ambrosia dumosa*), western Joshua tree, and desert Nevada ephedra (*Ephedra nevadensis*) also present. The canopy is continuous or intermittent and typically less than 3 meters tall. The herbaceous layer is open to intermittent with seasonal annuals or perennial grasses. This alliance is found in alluvial fans, bajadas, upland slopes and minor intermittent washes on well-drained soils. The Project sites contain approximately 2.04 acres of disturbed areas which includes roads, off-road vehicle movement, and semi-truck parking.

Impacts to Special-Status Species

Four special-status plant species were documented on the Project sites, including western Joshua tree, silver cholla (*Cylindropuntia echinocarpa*), pencil cholla (*Cylindropuntia ramosissima*), and beavertail cactus (*Opuntia basilaris var. basilaris*).

Special-Status Plant Species

Two western Joshua trees were recorded on the Project sites and a third Joshua tree was recorded approximately 200 feet south of the East site. The western Joshua tree is a candidate for listing under California Endangered Species Act (CESA) and is covered under the Western Joshua Tree Conservation Act (WJTCA). The WJTCA creates a streamlined permitting framework for certain development activities and directs the California Department of Fish and Wildlife (CDFW) to collect mitigation fees for the acquisition and conservation of western Joshua tree and its habitat. The WJTCA fees are based on the total number of individual trees at specific height intervals. Since the on-site Joshua trees would be removed to accommodate the proposed uses, the Project would be required to secure a CDFW permit and pay the fees to mitigate its impacts on Joshua trees to less than significant levels, as required by 2009 EIR Mitigation Measure 3 and provided for by Project-specific Mitigation Measure BIO-1, presented subsequently.

The Project would remove 51 pencil chollas, 10 silver chollas, and four beavertail cacti, which are regulated under the California Desert Native Plant Act and the Town of Apple Valley Municipal Code Chapter 9.76. A removal permit pursuant to the Town of Apple Valley Municipal Code Chapter 9.76 would be required for the removal of pencil cholla, silver cholla, and beavertail cactus. To comply with these ordinances, and as required by 2009 EIR Mitigation Measure 15, Project-specific Mitigation Measure BIO-9 would offset any impacts to these species.

With the implementation of Mitigation Measures BIO-1 and BIO-9, impacts to special-status plant species would be less than significant.

Special-Status Animal Species

The Project sites have the potential to support the following species: Crotch's bumble bee, burrowing owl, desert tortoise, Mohave ground squirrel, LeConte's thrasher, Bendire's thrasher, loggerhead shrike, and desert kit fox.

The Project would result in the loss of habitat that has the potential to support special-status avian species, including LeConte's thrasher, Bendire's thrasher, and loggerhead shrike. Impacts to these species would be considered potentially significant prior to mitigation under CEQA. However, based on the relatively low sensitivity ranking of these species, their broad distribution, surrounding suitable habitat in adjacent vacant lands, and the inclusion of a pre-construction nesting bird survey, impacts to the LeConte's thrasher, Bendire's thrasher, and loggerhead shrike would be less than significant. Consistent with 2009 EIR Mitigation Measure 4, Project-specific Mitigation Measures BIO-2 and BIO-3 present the requirements for the survey, and steps to be taken should nesting birds be identified onsite.

The Project would result in the loss of habitat that has the potential to support desert kit foxes. However, based on the relatively low sensitivity ranking of this species, its broad distribution, surrounding suitable habitat in adjacent vacant lands, and the inclusion of a pre-construction survey, impacts to desert kit fox would be less than significant through compliance with existing State regulations (CCR Title 14 § 460). Consistent with 2009 EIR Mitigation Measure 3, Project-specific Mitigation Measure BIO-4 would preclude significant impacts to the desert kit fox, should they move onto the sites.

The desert tortoise survey conducted on the Project site in 2022 was negative for desert tortoises or their sign. Impact to any desert tortoise would be significant and requires mitigation. To that end, Mitigation Measure BIO-5 requires the implementation of a worker environmental awareness program (WEAP) prior to any ground disturbance on the Project sites; the inspection of vehicles and monitoring of Project construction activities by a qualified biologist; and the covering of open trenches or their inspection if they are left uncovered overnight. If the species is identified on the sites, only the qualified biologist (in consultation with the wildlife agencies and after securing all necessary permits) would have the authority to determine whether it is to be avoided or relocated. With implementation of this Mitigation Measure, impacts to desert tortoise, should they move onto the sites, would be reduced to less than significant levels.

The burrowing owl surveys conducted in 2022 identified three active burrow complexes, each occupied by an adult burrowing owl, and two inactive burrow complexes (with no owls or owl sign). Two of the active burrow complexes were recorded on the West Site and the third was recorded immediately adjacent to the East Site. In October 2024, the California Fish and Game Commission voted to grant the western burrowing owl "candidate" species status under the CESA. This status gives the burrowing owl the same legal protections as a threatened or endangered species for the next 12–18 months. The California Department of Fish and Wildlife (CDFW) will conduct a status review to determine whether to list the burrowing owl as threatened or endangered. (CDFW, 2024) Any impact to burrowing owl would be considered potentially significant prior to mitigation under CEQA. To demonstrate compliance with 2009 EIR Mitigation Measure 5, Project-specific Mitigation Measures BIO-6 and BIO-7 present the actions to be taken to preclude impacts to this species.

The Project would result in loss of habitat for Crotch's bumble bee and Mohave ground squirrel and has a potential to result in mortality from ground-disturbing activities. Impacts to these species would be considered potentially significant prior to mitigation. Consistent with 2009 EIR Mitigation Measure 3, Project-specific measures BIO-9, and BIO-10 would ensure impacts to the Crotch's bumble bee and Mohave ground squirrel would be less than significant.

Jurisdictional Waters

Nine ephemeral drainage features have been recorded within the Project sites that exhibit a bed and bank, extending in a general northeast to southwest/west flow pattern. No portion of the drainage features supports riparian or wetland habitat.

No US Army Corps of Engineers (USACE) jurisdiction is present within the Project sites.[7] Flows associated with the identified drainages do not comprise relatively permanent, standing or continuously flowing bodies of water and are not connected hydrologically with a water of the United States. These drainages convey surface water only in direct response to precipitation (e.g., rain) and as such rarely contain surface water. Based on the infrequent presence of any surface flows and the lack of connectivity to other water of the United States, none of the drainage features located within the Project sites are considered under the jurisdiction of the USACE.

Since the onsite drainages are not subject to USACE jurisdiction pursuant to Section 404 of the CWA, in turn they would not be subject to Regional Water Quality Control Board (RWQCB) jurisdiction pursuant to Section 401 of the CWA. However, since these features convey breaks in the streambank slopes and scour marks created by storm flows, they are considered to be waters of the State that would be regulated by the RWQCB pursuant to the Porter-Cologne Act. RWQCB jurisdiction comprises a total of approximately 0.92 acre, or a total of approximately 14,196 linear feet.

There is no adjacent riparian habitat present along these features. Therefore, CDFW jurisdiction is limited to the top of the bank of each feature. The total amount of CDFW jurisdictional area is 1.54 acres.

Pursuant to 2009 EIR Mitigation Measure 13, proper coordination with appropriate regulatory agencies would be required by Project-specific Mitigation Measure BIO-11 acting to preclude significant impacts in this regard.

Impacts to Wetlands, Riparian Habitats, and Sensitive Natural Communities

None of the identified drainages contain State or federally protected wetlands, riparian habitat, or other sensitive natural communities. The only native vegetation community on-site, *Larrea tridentata* Shrubland Alliance (Creosote Bush Scrub), is not considered

[7] As determined by the Jurisdictional Delineation Report, Apple Valley Project Site, Apple Valley, California (Psomas) April 12, 2023, and verified by the Biological Resources Assessment (*Technical Appendix B*).

special-status. Therefore, the proposed Project would have no impact on wetlands, riparian habitat or other sensitive natural communities.

The Project site does not contain any State or federally protected wetlands. Therefore, the proposed project would have no impact on State or federally protected wetlands.

Impacts to Wildlife Movement or Nursery Sites

The Project sites are not designated as a wildlife corridor, linkage, or lands important for movement by various wildlife, nor does it function in a manner that connects separated natural areas. Therefore, the Project would not interfere with or impact the movement of native resident or migratory fish or wildlife species or established native resident or migratory wildlife corridors and implementation of the Project would not be considered a significant impact.

The Project sites do not support wildlife nursery sites such as bird rookeries and heronries, or bat maternity roosts. However, the Project sites have the potential to support native bird nest sites. The Project sites and adjacent lands support vegetation communities, land cover types, trees, and other habitat features that provide nesting habitat for avian species covered under the MBTA and Fish and Game Code, including special-status species such as Le Conte's thrasher, Bendire's thrasher, and loggerhead shrike. Construction of the Project has the potential to disturb native or migratory birds that breed and nest in shrubs or on the ground surface on and adjacent to the Project sites if ground-disturbing or vegetation-removing construction activities are initiated or conducted during the avian breeding season (February 1 through September 15). Potential impacts on special-status and migratory birds that could result from construction and operation of the Project includes destruction of eggs or occupied nests, mortality of young, and abandonment of nests with eggs or young birds prior to fledging. Impacts are prohibited by MBTA and California Fish and Game Code, and destruction of nests, eggs, or young would be considered a significant impact under CEQA Guidelines. With the implementation of Project-specific Mitigation Measures BIO-3, and BIO-4, impacts to migratory nesting birds would be reduced to less than significant levels.

Impacts associated with Conflicts to Local Policies or Adopted Habitat Conservation Plans

The Project would remove two western Joshua trees, which are regulated under the Town of Apple Valley Municipal Code Chapter 9.76. To comply with this local ordinance, Mitigation Measure BIO-1 would offset any impacts to this species, which will satisfy the requirements of the Town of Apple Valley Municipal Code. Pursuant to the Town of Apple Valley Interim Local Policy and Procedures On The Western Joshua Tree "No additional approvals are required by the Town if an ITP is obtained from CDFW." Since the Project would acquire an ITP from CDFW, no other actions are required to comply with the Town of Apple Valley local policies and regulations.

The Project would remove 51 pencil chollas, 10 silver chollas, and four beavertail cacti, which are regulated under the California Desert Native Plant Act and the Town of Apple Valley Municipal Code Chapter 9.76. A removal permit pursuant to the Town of Apple Valley Municipal Code Chapter 9.76 would be required for the removal of pencil cholla, silver cholla, and beavertail cactus. To comply with these ordinances, and as required by 2009 EIR Mitigation Measure 15, Project-specific Mitigation Measure BIO-9 would offset any impacts to these species. With the implementation of Measure BIO-9, impacts to western Joshua tree, pencil cholla, silver cholla, and beavertail cactus would be less than significant, therefore and would not conflict with local policies and ordinances.

The Project sites are located within the planning area for the proposed Town of Apple Valley Multiple Species Habitat Conservation Plan/Natural Community Conservation Plan (MSHCP/NCCP). However, the MSHCP/NCCP has not yet been adopted and as such, there is no requirement under CEQA to analyze Project consistency with this plan. If the NCCP/HCP is approved before Project approval, the biological report prepared for the Project would be revised and reviewed to be consistent the MSHCP/NCCP.

Conclusion

The proposed Project could potentially impact sensitive biological resources occurring on the Project sites. However, like the 2009 EIR, the Project-specific mitigation measures presented below address potentially significant impacts, and would reduce these impacts to less than significant levels, including impacts to native plants, burrowing owl, migratory birds, desert tortoise, desert kit fox, Crotch's bumble bee, Mohave ground squirrel, and jurisdictional waters.

The Project would result in impacts to biological resources which are equivalent to those identified in the 2009 EIR. No species not known to occur at the time that the 2009 EIR was prepared, occur or are expected to occur on the Project site. Mitigation measures proposed for the Project are consistent with the findings of the 2009 EIR and would have been imposed on the Project as they were recommended in the 2009 EIR. No changes to the environment that result in any new or more significant impacts would result from development of the Project.

BIO-1 The western Joshua tree is a State candidate threatened species and as such an Incidental Take Permit (ITP) shall be obtained from the California Department of Fish and Wildlife (CDFW) prior to Project activities through the provisions outlined in the Western Joshua Tree Conservation Act (WJTCA). Pursuant to the WJTCA, mitigation for the western Joshua tree can be acquired through payment of an in lieu mitigation fee on a per tree basis. Monetary amounts for each removed western Joshua tree include: (1) One thousand dollars ($1000) for each western Joshua tree 5 meters (16.40 feet) or greater in height, (2) Two hundred dollars ($200) for each western Joshua tree 1 meter (3.28 feet) or greater but less than 5 meters (16.4 feet) in height, and (3) One hundred twenty-five dollars ($125) for each western Joshua tree less than 1 meter (3.28 feet) in height.

BIO-2 If ground-disturbing or vegetation-removing construction activities or tree removal is proposed during the breeding/nesting season for migratory birds (typically February 1 through September 15), a qualified Biologist shall conduct pre-construction surveys for special-status birds and other migratory birds within the construction area, including a 300-foot survey buffer, no more than 3 days prior to the start of ground-disturbing activities in the construction area.

BIO-3 If an active nest (i.e., a nest with eggs or fledglings) is located during pre-construction surveys or at any point during the construction phase of the Project, the Town shall be notified regarding the status of the nest. Furthermore, construction activities shall be restricted as necessary to avoid disturbance of the nest until it is abandoned or a qualified Biologist deems disturbance potential to be minimal. Restrictions may include establishment of exclusion zones (no ingress of personnel or equipment at a minimum

radius of 300 feet around an active raptor nest and a 50-foot radius around an active migratory bird nest) or alteration of the construction schedule.

BIO-4 A qualified Biologist shall conduct pre-disturbance clearance survey for the desert kit fox within 7 days prior to initiation of ground-disturbing activities (i.e., grubbing, grading, disking, etc.) and within 300 feet of the Project sites. If the desert kit fox is not detected during the pre-disturbance clearance survey in an active den, then no additional action is required. If the desert kit fox is detected on-site in an active den, then the Project Applicant shall coordinate with the Town to determine if "take" would occur with consideration of avoidance measures. If a "take" would occur, then the Project Applicant shall coordinate with the California Department of Fish and Wildlife (CDFW) prior to conducting any ground-disturbing activities associated with the Project sites and create a relocation plan to avoid/minimize impacts to this species. An avoidance buffer of 300 feet shall be implemented around the active den until the den is determined to be inactive

BIO-5 A qualified Biologist shall conduct a pre-disturbance desert tortoise clearance survey within three days prior to site ground-disturbing activities (e.g., clearing and grubbing, grading, etc.). If desert tortoises are not detected during the pre-disturbance desert tortoise clearance survey, then no additional action is required. If desert tortoises are detected on-site, the Project Applicant shall coordinate with the Town to determine if "take" would occur with consideration of avoidance measures. If a "take" would occur, then the Project Applicant shall obtain take authorization under the Endangered Species Act and the California Endangered Species Act (CESA), likely in the form of an Incidental Take Permit (ITP) issued by the United States Fish and Wildlife Service (USFWS) and California Department of Fish and Wildlife (CDFW) prior to conducting any ground-disturbing activities, or would need to avoid conducting any project-related ground-disturbing activities within the portions of the project site deemed to be occupied by desert tortoise by a qualified Biologist.

BIO-6 Focused surveys for burrowing owls shall be performed according to California Department of Fish and Wildlife (CDFW) 2012 Staff Report on Burrowing Owl Mitigation, which requires a series of four visits during the breeding season or four visits during the non-breeding season. If survey results are positive, meaning there are burrowing owl(s) occupying burrow(s), including nest burrows with eggs or fledglings, the Project Applicant shall retain a qualified Biologist to develop and implement a Burrowing Owl Mitigation Plan, which shall be approved by the Town of Apple Valley. The Burrowing Owl Mitigation Plan shall contain the following elements at a minimum:

- Avoidance of burrowing owls during construction, including establishment of a 160-foot radius around occupied burrows during the nonbreeding season (September 1 through January 31) or a 200 to 500 meter radius around occupied burrows during the breeding season (February 1 through August 31), within which construction activities may not occur until a qualified Biologist has determined that (1) nonbreeding season owl(s) have dispersed from the area; or (2) breeding owls have fledged their juveniles from the nesting burrows and the juveniles are foraging independently and are capable of independent survival or have dispersed from the area.

- A plan for implementing a passive relocation plan for nonbreeding owls, should it be needed. The passive relocation plan shall include a plan for monitoring for burrowing owls at occupied and unoccupied burrows, closure of unoccupied burrow(s) after they have been determined not to be occupied by burrowing owl(s), eviction of the burrowing owl(s) from the occupied burrow(s), and closure of the formerly occupied burrow(s). Closures of both occupied and unoccupied burrows shall include the use of one-way doors at the burrow entrance(s) for at least 3 days prior to closure to ensure that the burrowing owl(s) or other wildlife have time to exit the burrow(s), followed by careful excavation of the burrow(s) by a qualified Biologist using hand tools, and refilling the burrow after the tunnel(s) and chamber(s) have been fully excavated.

BIO-7 Regardless of the results of the focused surveys required by Mitigation Measure BIO-6, the Project Applicant shall retain a qualified Biologist to perform a pre-construction burrowing owl survey to determine whether burrowing owls are present on-site within 30 days prior to construction activities, according to the California Department of Fish and Wildlife (CDFW) 2012 guidelines protocol. If construction is delayed or suspended for more than 30 days after the survey, the area shall be resurveyed. The pre-construction survey shall be completed on the Project site and areas within 500 feet from the Project boundary (where possible and appropriate based on habitat). All occupied burrows shall be mapped on an aerial photo. The Project Applicant shall provide a burrowing owl survey report and mapping to the Town, at least 30 days prior to the expected start of any Project-related ground disturbance activities or restart of activities. If the survey is positive for burrowing owls, the Project Applicant shall implement a Burrowing Owl Mitigation Plan, as detailed by Mitigation Measure BIO-6. If no burrowing owls are detected during the pre-construction survey, no further action is necessary.

BIO-8 Focused Crotch's bumble bee surveys, in accordance with survey guidelines described in the 2023 California Department of Fish and Wildlife (CDFW) Survey Considerations for California Endangered Species Act (CESA) candidate Bumble Bee Species, shall be conducted within 1 year prior to ground-disturbing activities (i.e., grubbing, grading, disking, etc.). If the focused surveys are positive for Crotch's bumblebee, then the Project Applicant shall coordinate with the Town to determine if "take" would occur with consideration of avoidance measures. If a "take" would occur, then the Project Applicant shall obtain take authorization under the California Endangered Species Act (CESA) in the form of an Incidental Take Permit (ITP) issued by CDFW prior to conducting any ground-disturbing activities. Requirements outlined in the ITP shall be used to offset impacts to this species.

BIO-9 Pursuant to Town of Apple Valley Municipal Code Chapter 9.76 the Project Applicant shall submit an application to the Town for removal or relocation of protected native desert plants protected under Municipal Code Chapter 9.76. The land use application and/or development permit approved for the

proposed Project, which would constitute the removal permit for the pencil cholla, silver cholla, and beavertail cactus, may include permit conditions such as salvaging or incorporating the plant into the landscape plan of the Project. The Project Applicant would comply with final conditions of the land use application and/or development permit when it is approved by the Town of Apple Valley.

BIO-10 Focused Mohave ground squirrel surveys and trapping, in accordance with survey guidelines described in the 2023 California Department of Fish and Wildlife (CDFW) Mohave Ground Squirrel Survey Guidelines, shall be conducted within one year of initiation of ground-disturbing activities (i.e., grubbing, grading, disking, etc.). If the focused surveys are positive for Mohave ground squirrel, the Project Applicant shall obtain take authorization under the California Endangered Species Act (CESA) in the form of an Incidental Take Permit (ITP) issued by CDFW prior to conducting any ground-disturbing activities. Requirements outlined in the ITP shall be used to offset impacts to this species.

BIO-11 The Project Applicant shall coordinate with the appropriate State and/or federal regulatory agencies prior to impacting any jurisdictional waters. Regulatory permits including a Regional Water Quality Control Board (RWQCB) Waste Discharge Requirement and a California Department of Fish and Wildlife (CDFW) Section 1602 Streambed Alteration Agreement would need to be acquired prior to impacts. The Project Applicant shall comply with the measures developed through consultation with the regulatory agencies and included in the appropriate agency permit.

With the incorporation of the preceding mitigation, when compared to the 2009 EIR, no new significant, substantially increased, or substantially different biological impacts would occur as a result of the Project. No changed or new information has been identified to indicate that any potential impacts resulting from the Project would be different from those previously identified and addressed in the Certified 2009 EIR.

E. Cultural and Tribal Resources

Summary of Findings in the 2009 EIR

The 2009 EIR analyzed both historic and archaeological resources occurring within the Town, including lands in the NAVISP and the Annexation areas. The Cultural Resources Technical Report prepared for the General Plan determined that about 30% of land within Town had been previously surveyed for cultural resources. The 2009 EIR identified potentially significant impacts to cultural resources, and provided mitigation measures, reproduced below, to reduce these impacts to less than significant levels.

The Town of Apple Valley and its surroundings were occupied by the Vanyume and Serrano peoples. Little is known about the Vanyume, who are thought to have disappeared by the early 1900s. The Mojave River provided water and other resources for Native American populations and served as a trade route. Resources have been identified along the River, including habitation debris, rock shelters and rock art. The Spanish relocated the Vanyume and Serrano peoples to missions when they arrived in the area in the 1770s, and the Serrano are now primarily associated with the San Manuel and Morongo Reservations.

Apple Valley was first settled by Europeans in the 1860s, and a land boom occurred in the 1880s. Apple orchards were established in the area in the 1890s, after the Appleton Land and Water Company built an irrigation system to support them. Agriculture and ranching remained the primary economic activities through the 1940s. Following World War II, the Apple Valley Ranchos company began development of modern-day Apple Valley by developing a western-themed town.

It is noted that at the time of its writing, paleontological resources were also analyzed under the cultural resources issue area and have been addressed in this sub-section. The 2009 EIR identified areas of Pleistocene-age soils, which are most likely to contain paleontological resources due to their age, adjacent to the Mojave River and within the Apple Valley Dry Lake. Most of the valley floor on which the Town is located consists of younger alluvium and is not thought to harbor fossilized remains.

Historic Resources

The 2009 EIR determined that of the 48 previously recorded sites identified in the Town 32 were historic period sites. As shown in Exhibit III-4 of the 2009 EIR, sensitive areas for historic resources occur primarily adjacent to Highway 18, in the center of Town, and in the southern end of Town. Historic and prehistoric sites have also been recorded in the vicinity of the Mojave River. The northern portion of Town, including the NAVISP and annexation areas, were determined to have low sensitivity for historic resources.

The 2009 EIR determined that build out of the General Plan had the potential to impact historic resources, both directly and indirectly, as development occurs and lands are disturbed. As a result, the 2009 EIR included Mitigation Measure 1, requiring the preparation of cultural resource studies for projects located in areas of high potential sensitivity for historic resources. In addition, Mitigation Measures 3 and 4 were provided, mandating the Town's maintenance of a confidential inventory of historic sites, and the protection of historic sites from vandalism by the Town, respectively. The 2009 EIR concluded that with implementation of these mitigation measures, impacts to historic resources would be reduced to less than significant levels.

Prehistoric and Tribal Resources

The 2009 EIR identified 16 recorded prehistoric sites, and seven pending sites which had yet to be recorded within the Town's boundary and the Annexation areas. Of these, six of the recorded sites and all of the pending sites represented habitation sites adjacent to or near the Mojave River, which as described above was an important part of Native American trading and lifeways. There were also 28 isolates previously identified within the General Plan area. The 2009 EIR's Exhibit III-4 identified the northern end of Town and the two annexation areas as having an elevated sensitivity for prehistoric/archaeological resources; generally, north of Johnson Road to the Town's northern limit. The Mojave River is also considered sensitive for these resources.

The 2009 EIR determined that due to the low percentage of previous site coverage (30%) in the past, build out of the General Plan would have the potential to significantly impact prehistoric, and therefore Tribal cultural resources. Because of the potential for significant impacts, Mitigation Measure 1 was included, which requires the preparation of cultural resource studies for projects located in areas of high potential sensitivity for

prehistoric resources. The 2009 EIR determined that with implementation of this mitigation measure, as well as Mitigation Measures 3 and 4, impacts to prehistoric and Tribal cultural resources would be reduced to less than significant levels.

Paleontological Resources

The hills in and surrounding the Town, as well as the surface soils on the valley floor, which contain Mesozoic rock and younger Quaternary alluvium, were determined to have a low potential for paleontological resources. Conversely, the 2009 EIR identified the older soils along the Mojave River and the deeper soils on the valley floor, which are of unknown age, as having the potential to yield fossil remains. The 2009 EIR concluded that disturbance of the surface soils had low potential to disturb paleontological resources as the General Plan was built out, but that areas of higher sensitivity, including the western boundary of Town south of Johnson Road, and the areas surrounding the Mojave River had a high potential for these resources, and impact to these resources would be significant. In order to mitigate these impacts, the 2009 EIR included Mitigation Measure 2, which requires the preparation of paleontological resource studies for areas of high sensitivity for these resources, as identified in Exhibit III-5 of the 2009 EIR. The 2009 EIR concluded that with implementation of this mitigation measure, impacts associated with paleontological resources would be reduced to less than significant levels.

Conclusion

Based on the preceding, the 2009 EIR determined that buildout of the General Plan could significantly impact historical, prehistorical, tribal, archeological, and paleontological resources. Mitigation measures, presented below, were developed to protect cultural and paleontological resources. With the implementation of Mitigation Measures 1-4 the 2009 EIR concluded that impacts would be less than significant.

2009 EIR Mitigation Measures

1. Cultural resource studies shall be required prior to development for all lands identified as having high potential for historic or archaeological resources, as identified in Exhibit III-4 [of the 2009 EIR]. The studies shall be reviewed and approved by the Town Planning Division prior to the issuance of any ground disturbing permit. The recommendations of the studies shall be made conditions of approval of the ground disturbing permits.

2. Paleontological resource studies shall be required prior to development for all lands identified as having high potential for paleontological resources, as identified in Exhibit III-5 (in the 2009 EIR). The studies shall be reviewed and approved by the Town Planning Division prior to the issuance of any ground disturbing permit. The recommendations of the studies shall be made conditions of approval of the ground disturbing permits.

3. The Town shall establish and maintain a confidential inventory of archaeological and historical resources within the Planning area, including those identified in focused cultural resources studies.

4. The Town shall protect sensitive archaeological and historic resources from vandalism and illegal collection to the greatest extent possible.

Comparison of 2009 GP EIR vs 2024 Industrial Lands Buildout

The 2009 EIR analyzed the cultural resource impacts associated with buildout of the Town consistent with the General Plan. Since that time, there have been no substantial General Plan Amendments that would change the intensity of development or the mix of land uses. As such, impacts on cultural resources as described in the 2009 EIR have not substantially changed, and no new conditions or more significant impacts that were not known, or could not have been known have occurred.

Analysis of Watson High Desert Logistics

Pursuant to 2009 EIR Mitigation Measure 1, above, a Project-specific Phase I Cultural Resources Study was prepared for the Project:

- *Cultural Resources Study for the Watson Apple Valley Project, Town of Apple Valley, San Bernardino County, California* (BFSA Environmental Services) April 3, 2024.

The Cultural Resources Study is provided as *Appendix C1* to this Addendum.

The Cultural Resources Study (*Appendix C1*) included an archaeological records search conducted at the South Central Coastal Information Center (SCCIC) at California State

University, Fullerton (CSU Fullerton) in order to assess previous studies and identify any previously recorded resources within the Project sites, or in the immediate vicinity.

The records search identified 19 resources (six prehistoric, one multicomponent, and 12 historic) within one mile of the Project sites. Two of the recorded resources are within the Project sites. One on-site resource is a historic wood-lined pit filled with sand; the other is a historic metal bucket. A Sacred Lands File (SLF) search was also requested from the Native American Heritage Commission (NAHC). The NAHC SLF search results were negative for the presence of any recorded Native American sacred sites or locations of religious or ceremonial importance within one mile of the Project sites.

Historic Resources

The Cultural Resources Study (*Appendix C1*) identified four previously unrecorded historic-age resources. Resources included the following:

- A foundation, trash scatter, and metal pipe extruding from the ground (likely associated with a well-head) within the West Project site.

- Metal pipe extruding from the ground (likely associated with a well-head) within the West Project site.

- Two trash scatters within the East Project site.

Generally, a resource shall be considered by a lead agency to be "historically significant" if the resource meets the criteria for listing on the CRHR (Public Resources Code SS5024.1, Title 14, Section 4852) including the following:

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.

The Cultural Resources Study determined that the two previously-recorded resources, as well as the four previously-unrecorded resources lacked integrity, were not associated with any significant individuals/events, and did not possess any research potential. As such, the resources did not meet the above criteria, and were determined ineligible for the CRHR. Since none of the resources within the subject properties were determined to be CRHR-eligible, potential Project-related impacts to them are not considered significant.

Archaeological Resources

The Cultural Resources Study (*Appendix C1*) included an intensive reconnaissance survey consisting of a series of transects conducted across both Project sites. The survey did not identify any prehistoric resources within the subject properties, and neither of the two previously- recorded resources could be relocated. Grading activities associated with future development under the Project could affect previously undisturbed native soil/sediment that may contain archaeological resources. Project Mitigation Measure CUL-1 below will ensure that impacts to archaeological resources are protected.

Buried Remains

No evidence of human remains or burials has been identified within the Project sites. Should any human remains be encountered during site excavation, California Health and Safety Code Section 7050.5 requires that all excavation stop, and that the County Coroner inspect the site. If the remains are identified as Native American by the coroner, the NAHC is required to contact the most likely descendant, and that descendant may recommend appropriate burial.

Tribal Consultation

The provisions of Assembly Bill (AB) 52 are not applicable to the proposed Project. AB 52 applies "…only to a project that has a notice of preparation or a notice of negative declaration or mitigated negative declaration filed on or after July 1, 2015." AB 52, which became effective on July 1, 2015, established a consultation process with California Native American tribes, and established Tribal Cultural Resources as a new class of resources to be considered in the determination of project impacts and mitigation under CEQA. AB 52 requires lead agencies to provide notice to tribes that are traditionally and culturally affiliated with the geographic area of a proposed project, if they have requested such notice in writing. The project notification is required prior

to the lead agency's release of a Notice of Preparation (NOP) of an EIR or notice of intent to adopt an MND or ND and is not required for an Addendum. However, pursuant to 2009 EIR Mitigation Measure 1, a Project-specific cultural resources report was prepared for the Project and Project Mitigation Measure CUL-1 is hereby incorporated to ensure that tribal cultural resources that may be encountered during grading activities will be protected.

Paleontological Resources

Pursuant to 2009 EIR Mitigation Measure 2, above, a Project-specific paleontological assessment was prepared for the Project:

- *Paleontological Assessment for the Watson Apple Valley Project, Town Of Apple Valley, San Bernardino County, California* (BFSA Environmental Services) May 10, 2024.

The Paleontological Assessment is provided as *Appendix C2* to this Addendum.

The Paleontological Assessment (*Appendix C2*) included a review of paleontological literature and fossil locality records in the area, a review of the underlying geology, and recommendations to mitigate impacts to potential paleontological resources, if necessary. Research has confirmed the existence of potentially fossiliferous Pleistocene-aged alluvial deposits that are present at both Project sites. These alluvial deposits are known to produce significant terrestrial vertebrate fossils at shallow depths in the region. Therefore, grading required for the Project has the potential to uncover significant fossil remains. Project Mitigation Measure CUL-2 is hereby incorporated to ensure that paleontological resources encountered during grading activities are protected.

Conclusion

As discussed above, although no significant cultural resources were identified during field surveys, there were 19 recorded resources identified within one mile of the Project sites and 4 previously unrecorded historic-era resources (not eligible for the CRHR) on the Project sites. In addition, the Project sites are underlain with potentially fossiliferous Pleistocene-aged alluvial deposits. Therefore, ground disturbing activities associated with development of the Project could have the potential to disturb unknown buried

archaeological or paleontological resources in native soils. As such, consistent with the findings of the Cultural Resources Study (*Appendix C1*) and the Paleontological Assessment (*Appendix C2*), monitoring of such activities shall be required.

CUL-1 Prior to any grading and/or other ground-disturbing activities, the Project Applicant will retain a qualified archaeological monitor to oversee any ground-altering activities. In the event that cultural resources are discovered during Project activities, all work within a 60-foot radius shall cease and any consulting tribes, including the Yuhaaviatam of San Manuel Nation (YSMN) Cultural Resources Department, shall be contacted regarding any pre-contact finds and be provided information after the archaeologist makes his/her initial assessment of the nature of the find, so as to provide Tribal input with regards to significance and treatment.

The archaeological monitor shall monitor the removal of debris and/or vegetation, structure demolition, grading, and excavation; and identify, record, recover, and report all resources. Monitoring shall be considered complete and may be discontinued at the conclusion of grading/ground-disturbing activities, or at an earlier date should the qualified professional determine that onsite activities would not disturb cultural resources of potential significance.

CUL-2 Prior to any grading and/or other ground-disturbing activities, the Project Applicant will retain a qualified paleontologist/paleontological monitor to oversee any ground-altering activities. Additionally, a Paleontological Resource Impact Mitigation Program (PRIMP), as outlined below, shall be implemented.

1. All mitigation programs should be performed by a qualified professional (project) paleontologist, defined as an individual with an M.S. or Ph.D. in paleontology or geology who has proven experience in San Bernardino County paleontology and who is knowledgeable in professional paleontological procedures and techniques. Fieldwork may be conducted by a qualified paleontological monitor, defined as an individual who has experience in the collection and salvage of fossil

materials. The paleontological monitor shall always work under the direction of a qualified paleontologist.

2. Monitoring of mass grading and excavation activities shall be performed by a qualified paleontologist or paleontological monitor. Full-time monitoring for paleontological resources from the surface will be conducted in areas where grading, excavation, or drilling activities occur in undisturbed alluvium to mitigate any adverse impacts (loss or destruction) to potential nonrenewable paleontological resources. Monitoring is not warranted in disturbed soils, such as artificial fill, or in crystalline bedrock formations, should they become exposed.

3. Paleontological monitors will be equipped to salvage fossils as they are unearthed to avoid construction delays and to remove samples of sediment that are likely to contain the remains of small fossil invertebrates and vertebrates. The monitor must be empowered to temporarily halt or divert equipment to allow for the removal of abundant or large specimens in a timely manner. The monitor shall notify the project paleontologist, who will then notify the concerned parties of the discovery. Monitoring may be reduced if the potentially fossiliferous units are not present in the subsurface or, if they are present, are determined upon exposure and examination by qualified paleontological personnel to have low potential to contain fossil resources.

4. In accordance with the "Microfossil Salvage" section of the Society of Vertebrate Paleontology guidelines (2010:7), bulk sampling and screening of fine-grained sedimentary deposits (including carbonate-rich paleosols) must be performed if the deposits are identified to possess indications of producing fossil "microvertebrates" to test the feasibility of the deposit to yield fossil bones and teeth.

5. Preparation of recovered specimens to a point of identification and permanent preservation will be conducted, including screen washing sediments to recover small vertebrates and invertebrates if indicated by the results of test sampling. Preparation of any individual vertebrate

fossils is often more time consuming than preparation for accumulations of invertebrate fossils.

6. All fossils must be deposited in an accredited institution (university or museum) that maintains collections of paleontological materials. The San Bernardino County Museum in Redlands, California, is the preferred institution for fossils recovered within the County of San Bernardino. All costs of the paleontological monitoring and mitigation program, including any one-time charges by the receiving institution, are the responsibility of the developer.

7. Preparation of a final monitoring and mitigation report of findings and significance will be completed, including lists of all fossils recovered and necessary maps and graphics to accurately record their original location(s). A letter documenting receipt and acceptance of all fossil collections by the receiving institution must be included in the final report. The report, when submitted to and accepted by the appropriate lead agency (e.g., the Town of Apple Valley), will signify satisfactory completion of the project program to mitigate impacts to any nonrenewable paleontological resources.

With the implementation of the above mitigation, impacts to cultural resources would be less than significant. The Project would not create any new impacts beyond those identified in the 2009 EIR. Accordingly, the Project would not result in any new or increased significant cultural or paleontological resource impacts than those anticipated by the previously certified EIR.

F. Geology and Soils

Summary of Findings in the 2009 EIR

The General Plan planning area is situated on gently sloping alluvial fans that range in elevation of approximately 3,400 feet above sea level near the base of the Fairview Mountains in the northeast to nearly 2,700 feet above sea level along the Mojave River in the west. Notable geologic formations include Bell Mountain (3,897 feet above sea level) and Catholic Hill (3,645 feet above sea level). Other major features include the

Mojave River, a wide floodplain that runs along and defines a portion of Apple Valley's western boundary.

Soils and Geologic Units

There are six types of geologic deposits that underlie the General Plan planning area: artificial or man-made fill, very young or recent alluvium, young alluvial and landslide deposits, older alluvial fan and valley deposits, sedimentary rocks, and crystalline rocks.

Landslide and Slope Instability

Approximately 1,792 acres consist of hillside terrain and mountains in the Town, the majority of which are generally not developed, except for local mining operations. The 2009 EIR concluded that development has occurred at the base of steep slopes, and scattered residential, commercial, and other land uses are at risk of slope failure. The Development Code includes specific requirements and prohibitions for the construction of structures on slopes.

Compressible Soils

In the General Plan planning area, compressible soils are most likely to occur where young (Holocene-age) unconsolidated deposits are present, as well as active and recently active stream channels. In addition, compressible soils are commonly found in canyon bottoms, swales, and at the base of natural slopes. Compression is also associated with landslide deposits, particularly at the head and along the margins of the slide. The 2009 EIR concluded that the planning area is primarily underlain by young alluvium that is potentially susceptible to collapse and compression. This potential is exacerbated when additional weight loads and/or pressure is applied.

Collapsible Soils

In the General Plan planning area, very young alluvial sediments that are granular in nature may be susceptible to adverse impacts to structures and infrastructure if not properly managed.

Expansive Soils

Expansive soils within the Town are primarily associated with areas underlain by older fan deposits containing argillic (clay-rich) soil profiles, which are in the moderately

expansive range. In addition, the Apple Valley Dry Lake contains very fine-grained silts and clays that are potentially expansive. Alluvial fan sediments, composed primarily of granular soils, underlie the low-lying areas of the Town and the expansion potential ranges from very low to moderately low.

Ground Subsidence

The 2009 EIR determined that the Mojave River Groundwater Basin underlies the Town of Apple Valley and vicinity. Water extraction from the basin has historically occurred at rates that exceeded natural replenishment, leading to an overdraft condition in the basin. Overdraft of the water basin can lead to ground subsidence. Based on US Geological Survey and Mojave Water Agency studies of subsidence in the Mojave River Groundwater Basin, the closest subsidence area to the Town of Apple Valley is located approximately seven miles northwest. As of 2009, subsidence had not been detected within Apple Valley's town limits. The continued implementation of groundwater conservation and recharge activities in the Apple Valley area contributes to the management of ground subsidence.

Soil Erosion

The Town of Apple Valley and vicinity are subject to erosion, runoff, and sedimentation due to the extreme topographic relief between the valley and the surrounding hills and mountains. Human activities, such as land development, accelerate natural erosion by disturbing the ground surface, which can expose sediment deposits to wind and water transport, alter natural drainage patterns, and increase the potential for erosion and sedimentation. Local modification of geological conditions, such as an increase in impermeable surfaces, can result in geological changes elsewhere, such as an increase in the potential for flooding and sedimentation downstream. Natural events, such as wind and rainstorms, can also lead to accelerated rates of erosion. The elevation difference between the Cajon Pass and the valley floor results in strong winds under certain climatic conditions. The strong winds combined with sandy surface soils commonly found in Apple Valley have the potential to result in wind erosion that poses an environmental hazard.

Earthquake Faults and Ground Shaking

The Town is located within a seismically active area (Seismic Risk Zone 4) and lies within approximately 50 miles of three active faults that are capable of generating

earthquakes greater than 6.5 $M_{w.}$ The 2009 EIR determined that surrounding geologic faults have the potential to cause moderate to extreme ground shaking and significant ground acceleration in the planning area. Seismic activity of this magnitude has the potential to result in direct damage to structures, property, and infrastructure, and/or generate indirect hazards such as slope instability, liquefaction, settlement, landslides, and seiche in Silverwood Lake and shallow lakes throughout the study area and can cause a variety of localized hazards such as urban fires, dam failures, and toxic chemical releases.

Conclusion

Based on the preceding, impacts related to geology and soils could be potentially significant. However, the 2009 EIR concluded that with the implementation of the following mitigation measures, which require site-specific studies and conformance with the Uniform Building Code (UBC), impacts would be reduced to less than significant.

2009 EIR Mitigation Measures

1. The Town shall establish and maintain an information database containing maps and other information that describes seismic and other geotechnical hazards occurring within the General Plan Area. Consult and coordinate with surrounding communities, the California Division of Mines and Geology, San Bernardino County, other applicable state and federal agencies, and professional engineering geologists to establish, improve, and routinely update the database.

2. Future development proposals shall require the preparation of a site-specific soils and/or geotechnical analysis that include an evaluation of seismic and soil conditions and provide recommendations that mitigate soils and geotechnical hazards or constraints.

3. Proper structural engineering, which takes into account the forces that will be applied to structures by anticipated ground motions, shall provide mitigation for ground shaking hazards. Seismic design shall be in accordance with the most recently adopted editions of the Uniform Building Code and the seismic design parameters of the Structural Engineers' Association of California.

4. Establish a cooperative agreement with the County Geologist, State Geologist, contract state-certified geologist, or contract geological engineer, to review and determine the adequacy of geotechnical and fault hazard studies prepared within the Town.

5. Design elements, such as baffles, shall be required to reduce the potential for seiches in tanks, open reservoirs, and ponds where overflow or structural failure may cause damage to nearby properties. Criteria for seismic design of water tanks shall be in accordance with the American Water Works Association (AWWA) Standards for Design of Steel Water Tanks.

6. New development shall not be placed within natural flow paths or result in substantial changes to drainage patterns offsite.

7. Development on wind or stream-deposited sediment or young alluvium on the valley floor should include site-specific subsurface geotechnical investigations that address the potential for seismic settlement, collapsible and expansive soils, and liquefaction. These hazards can be mitigated by proper excavation, compaction, backfilling, and foundation design.

8. Site-specific geotechnical analyses shall be conducted where new development is proposed adjacent to or in close proximity to steep slopes. Analyses shall evaluate the potential for landslides, rock falls, and/or slope failure, and set forth mitigation measures to minimize these hazards such as the use of setbacks, retaining walls, and vegetation buffers.

9. Retaining walls shall be constructed to adopted building code standards, include an adequate sub-drain system at the base to prevent excessive hydrostatic pressure, and be evaluated by the Building Inspector.

10. All existing vegetation and debris shall be removed from areas that are to receive compacted fill. Removal of trees shall include a minimum of 95% of the root systems. Excavation to depths ranging from 2 to 4 feet or more below the existing site grade may be required.

11. Encourage consultation and coordination between the Town of Apple Valley Public Works Division, Apple Valley Ranchos Water Company, Mojave Water Agency, U.S. Geological Survey, and other appropriate agencies in order to routinely monitor groundwater levels and surface elevations in the Town.

12. The Town shall actively support and participate in local and regional efforts to conserve water in an effort to mitigate potential ground subsidence resulting from over extraction of groundwater. Preventive measures include the use of water efficient appliances and faucets indoors, desert tolerant landscaping, and increased use of reclaimed water, storm water, or imported water. (Also see Water Resources in Section III-I)

13. Maintain working relationships and strategies between the Public Works Division, Apple Valley Fire Protection District, and other appropriate agencies to strengthen or relocate utility or service facilities including the expedient retrofitting of weak or damaged service structures, enforce fire and building codes, and take other appropriate measures to safeguard major utility distribution systems in preparation of a seismic event.

14. The Town shall coordinate and cooperate with public and quasi-public agencies to encourage education and earthquake preparedness so that residents can be self-sufficient after a seismic event.

15. All grading permit requests shall include a soil erosion prevention plan. Blowing dust and sand during grading operation shall be mitigated by maintaining moist surface soils, limiting the area of dry exposed soils, planting stabilizing vegetation, establishing windbreaks with non-invasive vegetation or perimeter block walls, applying chemical soil stabilizers, and adequately watering construction sites prior to and during grading and site disturbance. (Also see Air Quality in Section III-C)

16. Proposed development within a designated Alquist-Priolo Earthquake Fault Zone shall require site-specific geotechnical investigation including fault trenching and other Alquist-Priolo Fault Zoning Act guidelines.

17. The Town shall require that development applications include plans indicating the location of leach fields, seepage pits, drainage facilities, and water-dependent

landscaping so that staff may evaluate the potential for ground saturation and assure that structural foundation are located an appropriate distance away to minimize the potential for localized soil collapse.

18. Imported and onsite fill soils for future development shall be approved by the project's soils engineer. Prior to placement as compaction fill the soils engineer shall assure that all fill materials are free of vegetation, organic material, cobbles and boulders greater than 6 inches in diameter, and other debris. Approved soil shall be placed in horizontal lifts or appropriate thickness as prescribed by the soils engineer and watered or aerated as necessary to obtain near-optimum moisture-content.

19. Fill materials shall be uniformly compacted to no less than 90% of the laboratory maximum density, by either over-filling and cutting back to expose a compacted core or by approved mechanical methods, as determined by American Society for Testing and Materials (ASTM) test method D-1557-78. The project soils engineer shall observe the placement of fill and take sufficient tests to verify the moisture content, uniformity, and degree of compaction obtained. In-place soil density measurements should be determined by the sand-cone method, in accordance with ASTM Test Method D-1556-64 (74), or equivalent test method acceptable to the Town's Building and Safety Department.

20. In general, finish cut slopes shall not be inclined steeper than 2:1 (horizontal to vertical). Attempts to excavate near-vertical temporary cuts for retaining walls or utility installations in excess of 5 feet may result in failure of the slope, which has the potential to damage equipment and injure workers. All cut slopes must be inspected by the project engineer during grading to provide additional recommendations for safe construction.

21. Foundation systems that utilize continuous and spread footings are recommended for the support of one and two-story structures. Foundations for higher structures must be evaluated based on structure design and on-site soil conditions.

22. Positive site drainage shall be established during finish grading. Finish lot grading shall include a minimum positive gradient of 2% away from structures for a

minimum distance of three (3) feet and a minimum gradient of 1% to the street or other approved drainage course.

23. Utility trench excavations in slope areas or within the zone of influence of structures should be properly backfilled in accordance with the following recommendations:

(a) Pipes shall be bedded with a minimum of 6 inches of pea gravel or approved granular soil. Similar material shall be used to provide a cover of at least 1 foot over the pipe. This backfill shall then be uniformly compacted by mechanical means or jetted to a firm and unyielding condition.

(b) Remaining backfill may be fine-grained soils. It shall be placed in lifts not exceeding 6 inches in thickness or as determined appropriate, watered or aerated to near optimum moisture content, and mechanically compacted to a minimum of 90% of the laboratory maximum density.

(c) Pipes in trenches within 5 feet of the top of slopes or no the face of slopes shall be bedded and backfilled with pea gravel or approved granular soils as described above. The remainder of the trench backfill shall comprise typical on-site fill soil mechanically compacted as described in the previous paragraph.

Comparison of 2009 GP EIR vs 2024 Industrial Lands Buildout

The 2009 EIR analyzed the geological impacts associated with buildout of the Town consistent with the General Plan. Since that time, there have been no substantial General Plan Amendments that would change the intensity of development or the mix of land uses. As such, geological impacts as described in the 2009 EIR have not substantially changed, and no new conditions or more significant impacts that were not known or could not have been known have occurred.

Analysis of Watson High Desert Logistics

The following preliminary research forms the basis for the site-specific information presented within this Section:

- *Geotechnical Research and Document Review, Watson High Desert Logistics – East, SEC Johnson Road and Navajo Road, Apple Valley California* (SoCalGeo) January 17, 2025.

- *Geotechnical Research and Document Review, Watson High Desert Logistics – West, NWC Los Padres Road and Navajo Road, Apple Valley California* (SoCalGeo) January 22, 2025.

These studies are presented as *Appendix D1* and *D2*, respectively, to this Addendum.

The Project, as with all projects in the Town, would be required to adhere to the policies of the General Plan, including the preparation of site-specific, design-level geotechnical analyses to accompany grading plans.

Fault Rupture

According to the site-specific Geotechnical Research documents and the California Geological Survey (CGS), the Project sites are not located within an Alquist-Priolo Fault zone, nor are active faults with the potential for surface rupture known to be located beneath the sites. (SoCalGeo, 2025a; SoCalGeo, 2025b; CGS, 2024a) Therefore, there is no potential to expose people to impacts from fault rupture resulting from seismic activity during the design life of the buildings.

Seismic Ground Shaking

The Project sites are located in a seismically active region and there is potential for significant ground shaking to occur within the area during a strong seismic event. Ground shaking at this intensity could result in significant damage to buildings and improvements associated with buildout of the Project. The Town requires that all new construction meet or exceed the Town ordinances and policies and the latest standards of the California Building Code (CBC) for construction in seismic hazard zones, which requires structural design that can accommodate maximum ground accelerations expected from known faults. Implementation of applicable mitigation measures set forth in the 2009 EIR (and reproduced below) would further ensure that potentially significant seismic-related ground shaking impacts would be reduced to less than significant levels.

Ground Failure

The sites are not located in an area identified as having susceptibility for ground failure, including liquefaction. Therefore, ground failure is not considered a significant design concern at the Project sites (SoCalGeo, 2025a; SoCalGeo, 2025b) Nonetheless, as required by 2009 EIR Mitigation Measures 2 and 7, a site-specific, design-level subsurface geotechnical investigation would be prepared for the Project that would address the potential for seismic settlement, collapsible and expansive soils, and liquefaction. These hazards would be mitigated by proper excavation, compaction, backfilling and foundation design. With implementation of the findings and recommendations presented within the design-level geotechnical investigation, impacts to future development within the Project sites would be less than significant.

Landslides

The sites are not located in an area identified as having susceptibility for landslides and therefore are not considered a significant design concern at the Project sites (SoCalGeo, 2025a; SoCalGeo, 2025b) Additionally, according to CGS, there have been no reported landslides within or near the Project sites. No slope areas considered susceptible to landslides or other slope failure exist within the Project sites (CGS, 2024b). Given the distance of natural slope areas from the Project sites and the relatively flat topography, no impacts related to landslides would occur.

Soil Erosion/Loss of Topsoil

Due to their granular composition, on-site soils are considered to be susceptible to erosion (SoCalGeo, 2025a; SoCalGeo, 2025b). Project construction activities would temporarily expose underlying soils, thereby increasing their susceptibility to erosion. Potential erosion impacts incurred during construction activities are mitigated below the level of significance through the Project's mandated compliance with a Town-approved Storm Water Pollution Prevention Plan (SWPPP), as well as compliance with SCAQMD Rules that prohibit grading activities and site disturbance during high wind events. At Project completion, potential soil erosion impacts in the area will be resolved, as pavement, roads, buildings, and landscaping are established, overcovering previously exposed soils.

The Project does not propose to significantly alter existing topography in a manner that would result in substantial soil erosion or the loss of topsoil. All Project development

plans would be subject to review and approval by the Town. As part of this review, the Town would ensure that the Project would conform to Town requirements, thereby minimizing the potential for soil erosion over the life of the Project.

The potential for the Project to result in substantial soil erosion or the loss of topsoil is considered less than significant. Implementation of applicable mitigation measures identified in the 2009 EIR, presented below, would further reduce potential impacts.

Expansive Soil

Unmitigated effects of expansive or otherwise unstable soils may adversely affect roadway subgrades, concrete slabs-on-grade, and building foundations. In the event of a severe earthquake in the vicinity, structural foundations and floors may be damaged if constructed in, or over, expansive or unstable soils.

Based on types of soils encountered at the Project sites, the expansion potential at the sites ranges from low to non-expansive (SoCalGeo, 2025a; SoCalGeo, 2025b). The CBC establishes methodologies and guidelines for identification of expansive soils and establishes responsive design standards which act to avoid potentially adverse effects of expansive soils on facilities. Additionally, mitigation measures described in the 2009 EIR, presented below, would further reduce potential impacts associated with expansive soils. Therefore, development of the Project would result in less than significant impacts associated with expansive soils.

Septic Tanks or Alternative Wastewater Disposal Systems

The Project would connect to the Town's existing wastewater systems, thereby eliminating the potential for impacts associated with septic tanks or alternative wastewater disposal systems.

Conclusion

The Project would utilize traditional construction methods governed by the Uniform Building Code and the Town's Municipal Code as it relates to seismic hazards. The Project would not require extensive excavation or other special building techniques. The following mitigation from the 2009 EIR shall be implemented:

2. Future development proposals shall require the preparation of a site-specific soils and/or geotechnical analysis that include an evaluation of seismic and soil conditions and provide recommendations that mitigate soils and geotechnical hazards or constraints.

3. Proper structural engineering, which takes into account the forces that will be applied to structures by anticipated ground motions, shall provide mitigation for ground shaking hazards. Seismic design shall be in accordance with the most recently adopted editions of the Uniform Building Code and the seismic design parameters of the Structural Engineers' Association of California.

6. New development shall not be placed within natural flow paths or result in substantial changes to drainage patterns offsite.

7. Development on wind or stream-deposited sediment or young alluvium on the valley floor should include site-specific subsurface geotechnical investigations that address the potential for seismic settlement, collapsible and expansive soils, and liquefaction. These hazards can be mitigated by proper excavation, compaction, backfilling, and foundation design.

9. Retaining walls shall be constructed to adopted building code standards, include an adequate sub-drain system at the base to prevent excessive hydrostatic pressure, and be evaluated by the Building Inspector.

10. All existing vegetation and debris shall be removed from areas that are to receive compacted fill. Removal of trees shall include a minimum of 95% of the root systems. Excavation to depths ranging from 2 to 4 feet or more below the existing site grade may be required.

15. All grading permit requests shall include a soil erosion prevention plan. Blowing dust and sand during grading operation shall be mitigated by maintaining moist surface soils, limiting the area of dry exposed soils, planting stabilizing vegetation, establishing windbreaks with non-invasive vegetation or perimeter block walls, applying chemical soil stabilizers, and adequately watering construction sites prior to and during grading and site disturbance.

17. The Town shall require that development applications include plans indicating the location of leach fields, seepage pits, drainage facilities, and water-dependent landscaping so that staff may evaluate the potential for ground saturation and assure that structural foundation are located an appropriate distance away to minimize the potential for localized soil collapse.

18. Imported and onsite fill soils for future development shall be approved by the project's soils engineer. Prior to placement as compaction fill the soils engineer shall assure that all fill materials are free of vegetation, organic material, cobbles and boulders greater than 6 inches in diameter, and other debris. Approved soil shall be placed in horizontal lifts or appropriate thickness as prescribed by the soils engineer and watered or aerated as necessary to obtain near-optimum moisture-content.

19. Fill materials shall be uniformly compacted to no less than 90% of the laboratory maximum density, by either over-filling and cutting back to expose a compacted core or by approved mechanical methods, as determined by American Society for Testing and Materials (ASTM) test method D-1557-78. The project soils engineer shall observe the placement of fill and take sufficient tests to verify the moisture content, uniformity, and degree of compaction obtained. In-place soil density measurements should be determined by the sand-cone method, in accordance with ASTM Test Method D-1556-64 (74), or equivalent test method acceptable to the Town's Building and Safety Department.

20. In general, finish cut slopes shall not be inclined steeper than 2:1 (horizontal to vertical). Attempts to excavate near-vertical temporary cuts for retaining walls or utility installations in excess of 5 feet may result in failure of the slope, which has the potential to damage equipment and injure workers. All cut slopes must be inspected by the project engineer during grading to provide additional recommendations for safe construction.

21. Foundation systems that utilize continuous and spread footings are recommended for the support of one and two-story structures. Foundations for higher structures must be evaluated based on structure design and on-site soil conditions.

22. Positive site drainage shall be established during finish grading. Finish lot grading shall include a minimum positive gradient of 2% away from structures for a minimum distance of three (3) feet and a minimum gradient of 1% to the street or other approved drainage course.

23. Utility trench excavations in slope areas or within the zone of influence of structures should be properly backfilled in accordance with the following recommendations:

    (a) Pipes shall be bedded with a minimum of 6 inches of pea gravel or approved granular soil. Similar material shall be used to provide a cover of at least 1 foot over the pipe. This backfill shall then be uniformly compacted by mechanical means or jetted to a firm and unyielding condition.

    (b) Remaining backfill may be fine-grained soils. It shall be placed in lifts not exceeding 6 inches in thickness or as determined appropriate, watered or aerated to near optimum moisture content, and mechanically compacted to a minimum of 90% of the laboratory maximum density.

    (c) Pipes in trenches within 5 feet of the top of slopes or no the face of slopes shall be bedded and backfilled with pea gravel or approved granular soils as described above. The remainder of the trench backfill shall comprise typical on-site fill soil mechanically compacted as described in the previous paragraph.

With the implementation of the preceding mitigation measures, the Project would not generate new significant impacts or a substantial increase in previously identified impacts associated with geology and soils. The Project would not create any new impacts beyond those identified in the 2009 EIR.

G. Hazardous and Hazardous Materials

Summary of Findings in the 2009 EIR

The Hazardous Material Division of the San Bernardino County Fire Department is the administering agency and the Certified Unified Program Agency (CUPA) responsible for the regulation of hazardous materials for the Town. Standards established by the

Town's Development Code are intended to ensure that the use, handling, storage, and transportation of hazardous materials comply with all applicable requirements of the State Government Code Section 65850.2 and Health and Safety Code Section 25505, and Article 80 of the Uniform Fire Code.

The Town's Multi Hazard Functional Planning Guidance Document (Multi Hazard Plan) establishes contingency plans when an incident involving hazardous materials occurs. The Town works with the Hazardous Materials Division (HMD) of the San Bernardino County Fire Department. The Hazardous Materials Team, a unit of the Apple Valley Fire District and a member of the San Bernardino County Hazardous Materials Team, responds to all calls received related to hazardous materials in Apple Valley, including fuel spills and the illegal dumping of unknown products in the Town and surrounding area, which are all part of the Fire District's service area. Local businesses must certify any hazardous materials at their facilities with the County HMD on an annual basis. HMD performs compliance inspections of facilities that handle hazardous materials, which are defined by the California Code of Regulations (Title 22).

Hazardous Sites

There are a limited number of small quantity generators that use or produce hazardous materials in Apple Valley and surrounding areas. At the time the 2009 EIR was prepared, there were 15 properties within the planning area that were listed in environmental databases. Of those 15 properties, 11 were listed as a result of generating, using, and/or disposing relatively small quantities of potentially hazardous materials from their business location, with no material releases having been reported on these properties. Significant hazardous material releases into the underlying soil and groundwater were not suspected at these locations.

The 2009 EIR found that there were no large quantity generators of hazardous waste in the Town of Apple Valley. A search of the US EPA Envirofacts Data Warehouse did not identify any Federal Superfund Sites (NPL), State Response Sites, Voluntary Cleanup Sites, School Cleanup Sites, Permitted Sites, or Corrective Action Sites. The search did identify 7 school investigation sites, all of which required no further action since no hazards were found. A search for Leaking Underground Fuel Tank (LUFT) cleanup

sites identified 15 spills within the Town. The Project sites are not included on the list of hazardous materials sites compiled pursuant to Government Code Section 65962.5.[8]

Airport Safety

The Apple Valley Airport, located at 21284 Corwin Road, has a moderate to high potential for hazardous material spills. The airport is permitted to discharge less than 1,000 gallons per day of treated sewage, which is considered a minor threat to groundwater. In addition, the site contains four underground fuel storage tanks, none of which have any reported spills or leaks. The San Bernardino County Department of Airports manages the maintenance and operation of the Apple Valley Airport. Two primary hazards derived from aviation activities include noise and aviation safety.

Emergency Response

At the time the 2009 EIR was prepared, the County of San Bernardino was developing mass evacuation plans for each region within the County, but the high desert region plan had not been completed.

The 2009 EIR determined that the Atchison Topeka and Santa Fe Railroad, Interstate 15, and Highway 18 may be used in the transfer of hazardous wastes and materials within the planning area. Therefore, the potential exists for spills and leaks from moving sources along these corridors, including within the proposed annexation areas. The California Highway Patrol (CHP) is responsible for cleaning up hazardous waste spills that occur in or along freeways and coordinating with California Department of Transportation (Caltrans) and the local sheriff and fire departments for additional enforcement and routing assistance.

Wildfire

At the time the 2009 EIR was prepared, wildfire was not a standalone topic required by the CEQA Guidelines. Discussions presented within the Hazards and Hazardous Materials and Public Services sections concluded that careful emergency planning under the 2009 General Plan and compliance with the Apple Valley Fire Protection District (AVFPD) would reduce fire-related impacts to less than significant levels.

[8] https://www.envirostor.dtsc.ca.gov/public/map/?myaddress=34.58793845662379%2C+-117.19207277230248

Conclusion

The 2009 EIR found that buildout of the Town pursuant to the 2009 General Plan update could result in the use of hazardous materials or create a hazardous condition within the Town or annexation areas. Hazardous materials transport, storage and handling are highly regulated at the federal, State, regional and local level. The long-term build out of the General Plan and annexation areas was expected to continue to be regulated by multiple agencies.

While businesses are required by federal, State, and local regulations to properly transport, use, and dispose of hazardous materials in the Town and its Sphere of Influence, it is possible that upset or accidental conditions may arise which result in the release of hazardous materials into the environment. However, compliance with the Town's Multi Hazard Plan and the implementation of the uniform regulations to manage the risk associated with transportation of hazardous materials will function to minimize the hazard risks that may occur.

The 2009 EIR presented mitigation measures to reduce the number and severity of hazardous materials incidents within the Town of Apple Valley and its Sphere of Influence, and to ensure impacts would be less than significant.

2009 EIR Mitigation Measures

1. The Town will cooperate with regulators and encourage the enforcement of laws that require all users, producers, and transporters of hazardous materials and wastes to clearly identify such materials, and notify the appropriate county, State and/or federal agencies as required by law.

2. The Town shall maintain appropriately managed access routes to facilitate the transport of hazardous and toxic materials.

3. The Town will work with the County Sheriff's Department, Caltrans, and CHP, to regulate the transport of hazardous materials along local roadways, State highways and routes, and interstates in the Town or the vicinity.

4. The Town will coordinate with the Apple Valley Fire Protection District and the San Bernardino County Environmental Health Department to assure improved response to, and capability for, handling hazardous materials incidents.

5. Future development within the General Plan area shall be required to comply with all applicable federal, state, and regional permitting requirements for hazardous and toxic materials generation and handling, including but not limited to the following:

    a. If it is determined that hazardous wastes are, or will be, generated by any proposed operations, the wastes must be managed in accordance with the California Hazardous Waste Control Law (California Health and Safety Code, Division 20, chapter 6.5) and the Hazardous Waste Control Regulations (California Code of Regulations, Title 22, Division 4.5). If so, the proposed facility shall obtain a United States Environmental Protection Agency Identification Number by contacting (800) 618-6942.

    b. If hazardous wastes are (a) stored in tanks or containers for more than ninety days, (b) treated onsite, or (c) disposed of onsite, then a permit from the Department of Toxic Substances Control (DTSC) may be required. If so, the proposed facility shall contact DTSC at (818) 551-2171 to initiate pre-application discussions and determine the permitting process applicable to the facility.

6. Developers shall submit for approval a detailed description of any hazardous materials use, as well as detailed plans for location of any hazardous materials storage and management facilities to the Apple Valley Fire Protection District.

7. The Town shall thoroughly evaluate development proposals for lands directly adjacent to sites known to be contaminated with hazardous or toxic materials or sites that use or contain potentially hazardous or toxic materials.

8. During project construction and implementation, the handling, storage, transport, and disposal of all chemicals, including herbicides and pesticides, runoff, hazardous materials and waste used on, or at, the project site, shall be in accordance with a project's BMP/Integrated Pest Management Plan, other relevant regulatory plans, and applicable County, State, and federal regulations.

9. The Town shall require all business that use, store, or produce hazardous material to comply with the County's Business Plan in addition to all Town regulations.

10. The Town shall annually update the SEMS Multihazard Functional Plan to ensure that emergency shelters and emergency evacuation routes are responsive to changing community needs.

11. The Town shall maintain documentation of known hazards to public health and safety and shall make this information available to government officials and organizations, emergency response personnel, and the general public.

Comparison of 2009 GP EIR vs 2024 Industrial Lands Buildout

The 2009 EIR analyzed the hazards associated with buildout of the Town consistent with the General Plan. Since that time, there have been no substantial General Plan Amendments that would change the intensity of development or the mix of land uses. As such, hazards as described in the 2009 EIR have not substantially changed, and no new conditions or more significant impacts that were not known or could not have been known have occurred.

Analysis of Watson High Desert Logistics

Handling, Storage, and Disposal of Hazardous Waste

During construction activities, the Project will require limited transport of potentially hazardous materials (e.g., paints, solvents, fertilizer, etc.) to and from the Project sites. Additionally, operation of the Project could, at most, involve the temporary storage and handling of potentially hazardous materials such as pesticides, fertilizers, paint products, or other types of publicly-available, consumer products that are pre-packaged for public distribution and use. This type of storage, transfer, use and disposal of potentially hazardous materials is extensively regulated at the local, State and federal levels. It is not anticipated that the development of the Project would result in conditions that are not currently addressed by existing regulations.

State and federal community-right-to-know laws allow the public access to information about the amounts and types of chemicals in use at local businesses. Laws also are in place that require businesses to plan and prepare for possible chemical emergencies.

Any business that handles hazardous materials (as defined in Section 25500 of California Health and Safety Code, Division 20, Chapter 6.95) will require a permit from the San Bernardino County Fire Department Hazardous Materials Division in order to register the business as a hazardous materials handler.

Such businesses also are required to comply with California's Hazardous Materials Release Response Plans and Inventory Law, which requires immediate reporting to the San Bernardino County Fire Department and the State Office of Emergency Services regarding any release or threatened release of a hazardous material, regardless of the amount handled by the business, and to prepare a Hazardous Materials Business Emergency Plan (HMBEP). An HMBEP is a written set of procedures and information created to help minimize the effects and extent of a release or threatened release of a hazardous material.

With mandatory regulatory compliance, the Project would not pose a significant hazard to the public or the environment through the routine transport, use, storage, emission, or disposal of hazardous materials, nor would the Project increase the potential for accident conditions which could result in the release of hazardous materials into the environment. Impacts in this regard are considered less than significant.

Evacuation Routes and Emergency Response

According to the Town's Local Hazard Mitigation Plan, interstates serve as major emergency response and evacuation routes. The proposed development would not impede access to major evacuation routes. The Project does not propose or require permanent alteration of vehicle circulation routes. Nor does the Project propose or require facilities or operations that would interfere with any identified emergency response or emergency evacuation plan.

Hazardous Material Sites

The Project sites are not included on the list of hazardous materials sites compiled pursuant to Government Code Section 65962.5.[9]

[9] https://www.envirostor.dtsc.ca.gov/public/map/?myaddress=34.58793845662379%2C+-117.19207277230248

Proximity to Schools

The subject property is not located in proximity to a school. The nearest school is Sycamore Rocks Elementary school, located over three miles southeast of the sites. Additionally, the Project does not include elements or aspects that would create or otherwise result in hazardous emissions. The Project would therefore have a less than significant potential to generate hazardous emissions or involve hazardous materials handling within proximity of an existing or proposed school.

Wildfire

According to the California Department of Forestry and Fire Protection (CalFire), the Project sites are located within a Local Responsibility Area and are not located within or near an area identified as being a Very High Fire Hazard Severity Zone (CalFire, 2024). The sites are not within a State Responsibility Area.

Warehouse uses such as the Project, are predominantly concrete structures which are not typically susceptible to fire. Additionally, on-site structures would be developed consistent with the California Building Code requiring new buildings to use ignition-resistant construction methods and materials as well as fire suppression systems. Within the Project sites, areas not covered by structure, parking areas, or detention basins would be landscaped and irrigated, acting to further reduce fire hazards.

Development of the Project sites would be subject to General Plan policies, mitigation measures, and Apple Valley Fire Protection District requirements. No new or increased severity of impacts would occur compared to those identified in the 2009 EIR.

Conclusion

Hazards and hazardous materials impacts of the Project are expected to be comparable to those previously identified in the 2009 EIR. Implementation of the following applicable 2009 EIR mitigation measures would assure that impacts remain at less than significant levels.

1. The Town will cooperate with regulators and encourage the enforcement of laws that require all users, producers, and transporters of hazardous materials and wastes to clearly identify such materials, and notify the appropriate county, State and/or federal agencies as required by law.

5. Future development within the General Plan area shall be required to comply with all applicable federal, State, and regional permitting requirements for hazardous and toxic materials generation and handling, including but not limited to the following:

   a. If it is determined that hazardous wastes are, or will be, generated by any proposed operations, the wastes must be managed in accordance with the California Hazardous Waste Control Law (California Health and Safety Code, Division 20, chapter 6.5) and the Hazardous Waste Control Regulations (California Code of Regulations, Title 22, Division 4.5). If so, the proposed facility shall obtain a United States Environmental Protection Agency Identification Number by contacting (800) 618-6942.

   b. If hazardous wastes are (a) stored in tanks or containers for more than ninety days, (b) treated onsite, or (c) disposed of onsite, then a permit from the Department of Toxic Substances Control (DTSC) may be required. If so, the proposed facility shall contact DTSC at (818) 551-2171 to initiate pre-application discussions and determine the permitting process applicable to the facility.

6. Developers shall submit for approval a detailed description of any hazardous materials use, as well as detailed plans for location of any hazardous materials storage and management facilities to the Apple Valley Fire Protection District.

8. During project construction and implementation, the handling, storage, transport, and disposal of all chemicals, including herbicides and pesticides, runoff, hazardous materials and waste used on, or at, the project site, shall be in accordance with a project's BMP/Integrated Pest Management Plan, other relevant regulatory plans, and applicable County, State, and federal regulations.

Based on the preceding, the Project would not create any new impacts beyond those identified in the 2009 EIR. Accordingly, the Project would not result in any new or increased significant cultural resource impacts than those anticipated by the previously certified EIR.

H. Hydrology and Water Quality

Summary of Findings in the 2009 EIR

The Town and annexation areas are located in the southern portion of the Mojave Desert with a climate characteristic of a high desert ecosystem. The Town experiences extreme fluctuations of daily temperature and strong seasonal winds. The region is impacted by winter storms, local thunderstorms, and summer tropical storms, all of which have the potential to produce substantial precipitation. The Town has historically been subject to flooding and associated hazards, such as mudflows, during severe summer storm events.

The San Bernardino Flood Control District implements broad management functions, including flood control planning, construction of drainage improvements for regional flood control facilities, and watershed and watercourse protection. The Town is responsible for local drainage management and requires development projects integrate on-site stormwater management and detention facilities to reduce the needed size of downstream facilities, creates opportunities for groundwater recharge, and provide for enhanced open space and/or recreation areas.

Drainage and Stormwater Management

The 2009 EIR found that future development under the General Plan update had the potential to alter existing drainage patterns and, in some areas, to result in the accumulation of a significant amount of debris during large storms. The General Plan update included goals, policies and programs designed to limit flood hazards and protect natural watersheds as well as lives and properties in areas subject to flooding. General provisions for flood hazard reduction are also provided in the Apple Valley Development Code, Grading Ordinance, and Subdivision Ordinance and apply to all lands in Areas of Special Flood Hazard.

The 2009 EIR set forth mitigation measures that require site-specific analyses be conducted prior to development that identify potential hazards and set forth effective mitigation measures and development standards that minimize impacts from structural failure and promote the health and safety of residents.

Water Resources/Demand

The 2009 EIR named several domestic water purveyors with distribution facilities in the Town as well as its Sphere of Influence. The Apple Valley Ranchos Water Company (AVRWC, now known as Liberty Utilities) provides domestic water services to most of the Town of Apple Valley. There are several other water purveyors, including Golden State Water Company (Golden State), Apple Valley Foothill County Water District, Apple Valley Heights County Water District, Apple Valley View Mutual Water Company, County Service Area 64, Juniper Rivera County Water District, Mariana Ranchos County Water District, Rancheritos Mutual Water Company, Thunderbird County Water District, and Navajo Mutual Water Company.

Land uses within the Town limits and annexation areas were expected to result in total water demand of 95,999.8 acre-feet per year at buildout. Residential development associated with implementation of the proposed General Plan and the annexations was estimated to result in water demand of 45,396.2 acre-feet per year at buildout. Commercial, industrial and other land uses were expected to result in water demand of 50,603.6 acre-feet per year at buildout. It was concluded that the 2005 AVRWC UWMP demonstrated that AVRWC has sufficient water supplies for its service area through year 2025 under normal and drought conditions. Nonetheless, the 2009 EIR determined that buildout of the General Plan area, including the annexation areas, would result in significant impacts to water resources without mitigation.

Water Conservation

Water conservation is an essential short and long-term resource management strategy, given increasing demands on water supplies in the General Plan area, including the annexation lands. Efforts to reduce per capita consumption are a priority. The implementation of water-efficient landscaping design and management is among the best conservation opportunities. The Town's Water Conservation Plan ordinance includes water regulations that prohibit wasteful water practices, including washing driveways and walkways with water and excessive runoff of landscape irrigation water and washing driveways, and establishes penalties for violation of these regulations. MWA has established a goal of 10% municipal conservation by 2020.

Water Quality

The 2009 EIR determined that groundwater contamination would increase under buildout of the General Plan and annexation areas. The 2009 EIR determined the General Plan goals, policies and programs would reduce impacts to water resources to less than significant levels, as well as to ensure that federal, State, local and all other applicable pollution control standards continue to be implemented.

2009 EIR Mitigation Measures

Hydrology

1. The Town shall monitor its Master Plans of Drainage every five years to ensure that it reflects changes to local and regional drainage and flood conditions.

2. The Town shall upgrade its local and regional drainage system through proactive planning and coordination with other responsible agencies to ensure the provision of a comprehensive system of flood control facilities throughout the Town.

3. The Town shall continue to implement flood-warning systems, and shall maintain its public outreach and information programs to educate and inform the public of potential flood hazards and provide potential solutions made available to them.

4. The Town shall develop evacuation plans in the 100-year and 500-year flood zones where critical facilities, including but not limited to schools, hospitals and nursing homes are located.

5. To ensure that water storage tanks retain their structural integrity during an earthquake, and so that water demands after the earthquake can be met, the Town shall coordinate with all water purveyors in the planning area to evaluate and retrofit all above-ground water tanks in the Town as necessary, based on their vulnerability to seismic hazards, to ensure compliance with the most current water tank design criteria.

6. Major drainage facilities, including debris basins and flood control channels, shall be designed to maximize their use as multi-purpose recreational or open space sites, consistent with the functional requirements of these facilities.

7. The Town shall assure that adequate, safe all-weather crossings over drainage facilities and flood control channels are provided where necessary, and are maintained for passage during major storm events.

8. The Town shall continue to restrict development in those areas that are FEMA-mapped as being subject to flooding and shall require site-specific hydrologic studies for future development to determine flooding potential for other areas.

9. Future development proposals shall be required to submit a hydrology study and mitigation plan which conforms to the Apple Valley Master Plan of Drainage or the Apple Valley West/Desert Knolls Master Plan of Drainage and other regional and local requirements, policies, and programs.

10. All new development shall be required to incorporate, at the developer's expense, adequate flood control mitigation, such as grading that prevents adverse drainage impacts to adjacent properties, on-site retention of runoff, and the adequate siting of structures located within flood plains and to, as part of project development.

11. Future flood control plans required of developers shall include specific recommendations and/or designs regarding pollution control techniques to be applied to keep pollutants, including herbicides, pesticides, and other hydrocarbons out of surface and groundwaters. Mitigation measures may include specifically designed open space areas such as artificial wetlands where nuisance and otherwise contaminated on-site runoff shall be retained separate from channels conveying off-site flows.

12. Bridging of General Plan roadways within new development projects shall be the responsibility of the developer on whose project the bridge occurs, and shall be included as a condition of approval.

13. Stormwater retention shall be enforced through the development review process and routine site inspection.

14. The Town shall pursue all credible sources of funding and continue to explore County funding, Cobey-Alquist Flood Plain Management Act, other State

programs, and Federal funding options for local and regional drainage improvements needed for adequate flood control protection.

15. Capital Improvement Plans for drainage management and control shall be developed, updated and maintained and shall be based upon the Apple Valley Master Plan of Drainage and the Apple Valley West/Desert Knolls Master Plan of Drainage.

16. The Town shall consider the establishment of Fair Share Cost Allocations or Assessment Districts for purposes of funding necessary drainage improvements in particular geographic areas throughout Apple Valley.

17. In conjunction with SBFCD the Town shall coordinate and cooperate in the filing of appropriate FEMA application materials to incrementally secure amendments to the Flood Insurance Rate Maps of the Town, consistent with existing and proposed improvements.

Water Conservation

1. The Town shall coordinate and cooperate with the Mojave Water District, the Apple Valley Ranchos Water Company, Golden State Water Company and other water purveyors within the Town to strengthen and expand educational and public relations programs that convey the importance of water conservation and water-efficient landscaping.

2. The Town shall promote, encourage and participate in the development of water management and conservation strategies through the Alliance for Water Awareness and Conservation, the San Bernardino Association of Governments (SANBAG) and its member jurisdictions, as well as the Mojave Water Agency, Apple Valley Ranchos Water Company, Golden State Water Company, and other water purveyors in the Town, on water supply and conservation programs.

3. The Town shall continue to implement its Water Conservation Plan ordinance and comply with State Assembly Bill 325 (AB 325) by limiting turfed areas in new projects and requiring the use of native and other drought-tolerant planting materials, installing efficient irrigation systems and monitoring existing systems to ensure maximum efficiency and conservation.

4. The Town shall require that all new developments use water conserving appliances and fixtures, including low-flush toilets and low-flow showerheads and faucets. The Town shall require the application of water-conserving technologies in conformance with Section 17921.3 of the Health and Safety Code, Title 20, California Administrative Code Section 1601(b), and applicable sections of Title 24 of the State Code.

5. The Town shall encourage the use of faucets, showerheads and appliances in new development that exceed Title 20 and Title 24 water efficiency requirements.

6. The Town shall require that future development in the General Plan area has an adopted Water Supply Assessment in compliance with AB 610 and 221 prior to approval of development plans.

7. The Town shall actively support and encourage the continuation and expansion of groundwater recharge efforts, and shall confer and coordinate with MWA and AVRWC regarding the possible future use of tertiary treated wastewater as a means of reducing demand for groundwater resources. To the greatest extent practicable, the Town shall direct new development to provide irrigation systems that are able to utilize reclaimed water, when available, for use in common area and streetscape landscaping.

8. The Town shall consider approaches and mechanisms that facilitate financing and construction of expanded wastewater collection facilities.

9. To the greatest extent practicable, the Town shall continue to require new development to connect to the community sewer system. Where sewer service is not available and lots are created of less than one (1) acre in size, the Town shall require the installation of “dry sewers” and the payment of connection fees for future sewer main extensions.

10. Consistent with community design standards and local and regional drainage plans, the Town shall provide development standards and guidelines for the construction of on-site storm water retention facilities.

11. The Town shall require that the development and maintenance of project-specific on-site stormwater retention/detention basins that implement the NPDES program, enhance groundwater recharge, complement regional flood control facilities, and address applicable community design policies subject to all applicable regulations, standards and guidelines.

12. The Town shall evaluate the potential of all proposed land use and development plans to create groundwater contamination hazards from point and non-point sources. The Town shall confer and coordinate as necessary with appropriate water agencies and water purveyors to ensure adequate review.

13. The Town shall coordinate with Apple Valley Ranchos Water Company, Golden State Water Company, and other water purveyors that serve the Town and its Sphere of Influence to establish/continue incentive programs to encourage that existing development be retrofitted to utilize water conserving fixtures, and landscaping and irrigation materials and controllers.

14. The Town shall restrict the amount of turf planted on all new commercial, industrial, public facilities, multi-family and front yards of single-family residential projects to reduce the amount of water used for irrigation.

15. Irrigation design that reduces overspray and uses conservation techniques shall be required for all new commercial, industrial, public facilities and multi-family projects which will reduce the amount of water used and wasted on irrigation.

16. The Town shall confer and coordinate with the Victor Valley Wastewater Reclamation Authority to explore the possible future provision of recycled/reclaimed wastewater that can serve new and existing development.

17. The Town shall consider incentive programs for the removal of existing turf and replacing the turf with drought tolerant desert landscaping that requires less water.

18. The Town shall proceed with the agreement entered into with the City of Hesperia to design two (2) wastewater reclamation plants that will enable reclaimed water to be used to irrigate Town parks and the Apple Valley Country Club Golf Course.

Public Services

1. All future development projects shall be subject to review by the Town and the applicable water purveyor to assess their potential impact on local groundwater supplies.

2. The Town and applicable water purveyor shall coordinate for the extension of infrastructure to serve future development in Annexations 2008-001 and 2008-002.

3. The use of drought tolerant landscaping shall be encouraged in public and private development.

4. Future development shall be required to conform to standards set forth in Section 17921.3 of the Health and Safety Code, Title 20, California Administrative Code Section 1601(b), and applicable sections of Title 24 of the State Code. These measures include the installation of low-flush toilets, low-flow showerheads and faucets in all new construction.

Comparison of 2009 GP EIR vs 2024 Industrial Lands Buildout

The 2009 EIR analyzed the impacts associated with hydrology, water resources and water quality from buildout of the General Plan and annexation areas based on the Land Use Element. Since that time, development has occurred consistent with that plan. There have been no substantial General Plan Amendments that would change the intensity of development. Therefore, the impacts related to hydrology and water quality as described in the 2009 EIR have not substantially changed, and no new conditions or more significant impacts that were not known or could not have been known have occurred.

The following discussions compare the water demand anticipated by the 2009 EIR ("Baseline Condition") with a "Current Cumulative Condition." The Current Cumulative Condition includes all currently developed projects, vacant land, and planned industrial projects in 2024 within the Town of Apple Valley. These projects (high-cube warehouse/distribution facilities) result in somewhat different demands than the general light industrial and industrial park categories assumed as part of the 2009 EIR.

Baseline Condition

Table 14, *Baseline Condition: Total Water Demand* provides the projected water demand for all industrial land uses based on the Town of Apple Valley 2009 EIR. Based on a demand factor of 3.4 gallons per square foot per year from the U.S. Energy Information Administration 2012 Commercial Buildings Energy Consumption Survey, the total industrial area accounted for in the 2009 EIR is estimated to generate demand for 637.3 acre-feet of water per year.

Table 14 Baseline Condition: Total Water Demand

Square Footage	Water Demand Factor(gal/sf/year)[1]	Water Demand (AFY)
61,081,400[2]	3.4	637.3

[1] Source: Warehouse water demand factor from U.S. Energy Information Administration, 2012 Commercial Buildings Energy Consumption Survey, Water Consumption in Large Buildings Summary.
[2] Represents the square footage for industrial uses assumed by the 2009 GP EIR, which was based on GIS calculations.

Current Cumulative Condition

Table 15, *Current Cumulative Condition: Indoor Water Demand* provides the projected water demand for all existing, vacant, and planned industrial uses (including the Project) within the Town of Apple Valley in 2024.

Table 15 Current Cumulative Condition: Indoor Water Demand

Indoor Square Footage	Water Demand Factor(gal/sf/year)[1]	Water Demand (AFY)
57,960,331[2]	3.4	604.7

[1] Source: Warehouse water demand factor from U.S. Energy Information Administration, 2012 Commercial Buildings Energy Consumption Survey, Water Consumption in Large Buildings Summary.
[2] Source: Table 1 of the Cumulative Trip Generation Assessment (Addendum *Appendix J1*). Represents General Plan buildout as of 2024 current conditions.

Based on the preceding discussion, industrial lands assumed in the Baseline Condition (and therefore accounted for in the 2009 EIR and 2006 NAVISP EIR) would generate demand for 637.3 acre-feet of water per year. The Current Cumulative Condition (2024 estimate of existing projects, vacant land, and planned industrial projects) would generate demand for 604.7 acre-feet of water per year. These calculations represent an approximately 5 percent decrease from the water demand estimated within the 2009 EIR.

Analysis of Watson High Desert Logistics

Hydrological conditions of the Project sites are identical to those analyzed in the 2009 EIR. The site is vacant and undeveloped. As shown in Exhibit IV-4 of the Apple Valley General Plan, the Project sites are located within the FEMA Zone D (area in which flood hazards are undetermined) and outside a 100-year flood zone.

Drainage and Stormwater Management

Project-specific hydrology studies were prepared for both the East and West Project sites:

- *Apple Valley Industrial, S/E Corner of Johnson and Navajo Road, Town of Apple Valley, CA Preliminary Hydrology Study Report* (WestLAND Group, Inc.) September 2024.

- *Watson High Desert Logistics West (Apple Valley 45), N/W Corner of Navajo Road and Los Padres Road, Town of Apple Valley, CA, Preliminary Hydrology Study Report* (WestLAND Group, Inc.) December 2023.

These studies are presented as *Appendix E1* and *E2*, respectively, to this Addendum.

The Project sites would maintain their natural drainage patterns post-development. As detailed in previous Section II. *Project Description*, A. *Project Components*, the on-site storm water management systems would capture flows in a series of catch basins for retention and/or infiltration.

The hydrology studies concluded that the Project would not create or contribute runoff that would exceed the capacity of the existing downstream storm drain system. The Project's storm drain system would be designed to accommodate the 100-year storm event. Once construction is complete, there would not be any substantial increase in flood boundaries, levels or frequencies in any areas outside the development.

Water Supply

The Project represents development consistent with both the 2009 EIR and NAVISP. Accordingly, water demands associated with the Project were included within the analyses presented within those documents.

Additionally, the 2020 Liberty Utilities Urban Water Management Plan indicates that Liberty Utilities can meet water demands during normal years, single dry years, and a five consecutive year drought period over the next 25 years for all uses within its territory, including the Project sites (Liberty 2020).

Moreover, as demonstrated in the previously presented comparative analysis, industrial lands accounted for in the 2009 EIR and NAVISP would generate demand for 637.3 acre-feet of water per year. The 2024 estimate of existing projects, vacant lands, and planned industrial projects (including the proposed Project) would generate demand for 604.7 acre-feet of water per year. This represents an approximately 5 percent decrease from the water demand estimated for 2009 EIR conditions. Based on the preceding, sufficient water supply exists to meet the demands of the Project; impacts would be less than significant.

Water Quality

The Project would be mandated to acquire all necessary permits, and comply with Town of Apple Valley and RWQCB requirements, acting to preclude, or substantively reduce the potential of the Project to violate any water quality standards or waste discharge requirements. Consistent with established Town building code regulations, a site-specific drainage study, SWPPP, and WQMP reflecting precise pad locations, proposed drainage structures, detention facilities, water quality management features, BMPs, etc., would be required prior to the issuance of building permits. Project compliance in these regards acts to preclude stormwater discharges that would potentially violate water quality standards.

Conclusion

Water demands of the Project were included within the projections presented within the 2009 EIR, and thus assumed by the 2020 Liberty Utilities Urban Water Management Plan. The Project would be required to comply with all Town regulations under the MS4 permit, including the implementation of Best Management Practices and erosion control

to prevent surface and ground water pollution. Buildout of the site is required to comply with applicable regulations, and policies set forth in the General Plan for the protection of local hydrology and water quality. Implementation of the same regulatory framework and policies as analyzed in the 2009 EIR will ensure that overall impacts are similar to those previously identified in the 2009 EIR. Additionally, the following mitigation from the 2009 EIR would be applicable to the Project.

Hydrology

9. Future development proposals shall be required to submit a hydrology study and mitigation plan which conforms to the Apple Valley Master Plan of Drainage or the Apple Valley West/Desert Knolls Master Plan of Drainage and other regional and local requirements, policies, and programs.

10. All new development shall be required to incorporate, at the developer's expense, adequate flood control mitigation, such as grading that prevents adverse drainage impacts to adjacent properties, on-site retention of runoff, and the adequate siting of structures located within flood plains and to, as part of project development.

11. Future flood control plans required of developers shall include specific recommendations and/or designs regarding pollution control techniques to be applied to keep pollutants, including herbicides, pesticides, and other hydrocarbons out of surface and groundwaters. Mitigation measures may include specifically designed open space areas such as artificial wetlands where nuisance and otherwise contaminated on-site runoff shall be retained separate from channels conveying off-site flows.

13. Stormwater retention shall be enforced through the development review process and routine site inspection.

Water Conservation

3. The Town shall continue to implement its Water Conservation Plan ordinance and comply with State Assembly Bill 325 (AB 325) by limiting turfed areas in new projects, and requiring the use of native and other drought-tolerant planting

materials, installing efficient irrigation systems and monitoring existing systems to ensure maximum efficiency and conservation.

4. The Town shall require that all new developments use water conserving appliances and fixtures, including low-flush toilets and low-flow showerheads and faucets. The Town shall require the application of water-conserving technologies in conformance with Section 17921.3 of the Health and Safety Code, Title 20, California Administrative Code Section 1601(b), and applicable sections of Title 24 of the State Code.

5. The Town shall encourage the use of faucets, showerheads and appliances in new development that exceed Title 20 and Title 24 water efficiency requirements.

6. The Town shall require that future development in the General Plan area has an adopted Water Supply Assessment in compliance with AB 610 and 221 prior to approval of development plans.

9. To the greatest extent practicable, the Town shall continue to require new development to connect to the community sewer system. Where sewer service is not available and lots are created of less than one (1) acre in size, the Town shall require the installation of "dry sewers" and the payment of connection fees for future sewer main extensions.

10. Consistent with community design standards and local and regional drainage plans, the Town shall provide development standards and guidelines for the construction of on-site storm water retention facilities.

11. The Town shall require that the development and maintenance of project-specific on-site stormwater retention/detention basins that implement the NPDES program, enhance groundwater recharge, complement regional flood control facilities, and address applicable community design policies subject to all applicable regulations, standards and guidelines.

12. The Town shall evaluate the potential of all proposed land use and development plans to create groundwater contamination hazards from point and non-point

sources. The Town shall confer and coordinate as necessary with appropriate water agencies and water purveyors to ensure adequate review.

14. The Town shall restrict the amount of turf planted on all new commercial, industrial, public facilities, multi-family and front yards of single-family residential projects to reduce the amount of water used for irrigation.

15. Irrigation design that reduces overspray and uses conservation techniques shall be required for all new commercial, industrial, public facilities and multi-family projects which will reduce the amount of water used and wasted on irrigation.

Public Services

1. All future development projects shall be subject to review by the Town and the applicable water purveyor to assess their potential impact on local groundwater supplies.

3. The use of drought tolerant landscaping shall be encouraged in public and private development.

4. Future development shall be required to conform to standards set forth in Section 17921.3 of the Health and Safety Code, Title 20, California Administrative Code Section 1601(b), and applicable sections of Title 24 of the State Code. These measures include the installation of low-flush toilets, low-flow showerheads and faucets in all new construction.

Based on the preceding, implementation of the proposed Project would not result in any new impacts or increase the severity of a previously identified significant impact as previously analyzed in the 2009 EIR.

I. Land Use and Planning, Population and Housing

Summary of Findings in the 2009 EIR

Land Use and Planning

The 2009 EIR described the previous General Plan land use allocations and compared them to the 2009 General Plan update. Prior to the 2009 update, the previous General Plan for the Town of Apple Valley allocated land uses for all incorporated areas, resulting in a total potential 50,053 residential units, 28,608,875 square feet of commercial land uses, and 37,848,814 square feet of industrial land uses at buildout. Buildout of Annexation 2008-001 under the previous land use designations would result in a total of 2,067 residential units and 53,192 square feet of commercial space. Buildout of Annexation 2008-002 under the previous land use designations would result in a total of 398 residential units and 3,101,376 square feet of industrial space.

Buildout of the 2009 General Plan and annexation areas resulted in a total of 63,749 dwelling units, 59,513 of which would occur within the Town and 4,236 in Annexation 2008-001. This represented an increase of 11,231 residential units, or an increase of 21.4 percent over the previous General Plan residential units due to increased residential densities. The 2009 General Plan update resulted in a total of 51,860,766 square feet of commercial space, or 23,198,699 square feet more than under the previous General Plan designations. 7,135,369 square feet of this increase occurred in Annexation 2008-001. In total, 2009 General Plan commercial square footage increased by 81% over the previous General Plan designations. The 2009 General Plan and Annexations resulted in a total of 58,051,428 square feet of industrial space, an increase of 17,101,238 square feet over the previous General Plan potential or 42% over the previous General Plan designations. Almost all of this increased industrial space occurred in the annexation areas (14,929,042 square feet).

The 2009 General Plan and annexations also resulted in an increase from 324.7 to 472.5 acres in Public Facility land uses, primarily associated with the addition of schools and other previously undesignated public lands in the previous General Plan; and an increase from 3,013.6 to 3,053.9 acres in Open Space lands.

The 2009 EIR determined the changes in the land use pattern within the General Plan area would not be significant and would not significantly affect the pattern of development which has already occurred.

Annexation 2008-001 was found to experience the greatest change in land use patterns. The 2009 land use plan for Annexation 2008-001 increased residential densities and added 773 acres of commercially designated lands, and 812.1 acres of industrial designated lands that were previously designated Rural Living. The 2009 EIR determined that the character of the existing rural residential development in this annexation area would be changed significantly by the 2009 land use designations. Although the General Plan included policies and programs designed to provide buffers between residential and non-residential uses, and the Town's Development Code included standards to protect surrounding residential development, the 2009 EIR determined that changes in land use designations could not be mitigated to less than significant levels. As a result, the anticipated changes in land use designations within Annexation 2008-001 were declared significant and unavoidable, as they relate to land use.

Annexation 2008-002 was vacant in 2009 and was previously designated for a mix of rural residential and industrial land uses. The 2009 General Plan update resulted in all lands being designated industrial. Because the lands in this annexation were vacant, and the area was bordered on the west by lands designated for industrial development, the 2009 EIR determined the land use designations proposed under Annexation 2008-002 would have no impact on the character of the area.

Population and Housing

The 2009 EIR described the buildout population of the previous General Plan and compared it to the 2009 General Plan update. The previous General Plan would result in a buildout population of 152,813 within Town limits, based on a 2008 Department of Finance household size of 3.053 persons per household. Buildout of Annexations 2008-001 and 2008-002 under the previous land use designations would result in a build out population of 6,459 persons and 1,245 persons, respectively, based on a 2008 Department of Finance household size of 3.125 persons per household in unincorporated San Bernardino County.

The 2009 EIR determined the proposed land use changes, specifically the increase in Medium Density Residential land uses in the 2009 General Plan update, would increase the build out population from 160,517 to 194,931 residents within the General Plan area, including both annexation areas.

Conclusion

The 2009 General Plan and annexations resulted in an increase in residential units, commercial and industrial square footage. Within the existing Town limits, the 2009 EIR determined the changes in the land use pattern within the General Plan area would not be significant and would not significantly affect the pattern of development which has already occurred.

Annexation 2008-001 was found to experience the greatest change in land use patterns. The 2009 land use plan for Annexation 2008-001 increased residential densities and added 773 acres of commercially designated lands, and 812.1 acres of industrial designated lands that were previously designated Rural Living. The 2009 EIR determined that the character of the existing rural residential development in this annexation area change significantly by the 2009 land use designations. Although the General Plan included policies and programs designed to provide buffers between residential and non-residential uses, and the Town's Development Code included standards to protect surrounding residential development, the 2009 EIR determined that changes in land use designations could not be mitigated to less than significant levels. As a result, the anticipated changes in land use designations within Annexation 2008-001 were declared significant and unavoidable, as they relate to land use.

Annexation 2008-002 was vacant in 2009 and was previously designated for a mix of rural residential and industrial land uses. The 2009 General Plan update resulted in all lands being designated industrial. Because the lands in this annexation were vacant, and the area was bordered on the west by lands designated for industrial development, the 2009 EIR determined the land use designations proposed under Annexation 2008-002 would have no impact on the character of the area. Impacts associated with land use in Annexation 2008-002 were found to be less than significant.

2009 EIR Mitigation Measures

1. Individual project proposals, especially those involving a mix of residential and other uses, as well as those located near sensitive lands or uses, shall be fully evaluated during the project review process to assure that all land use compatibility issues are addressed and mitigated.

2. Development in currently undeveloped areas shall be controlled to assure adequate infrastructure, including roadways, water and wastewater systems.

Comparison of 2009 GP EIR vs 2024 Industrial Lands Buildout

The 2009 EIR analyzed the land use and population impacts associated with buildout of the Town consistent with the General Plan. Since that time, there have been no substantial General Plan Amendments that would change the intensity of development or the mix of land uses. As such, impacts as described in the 2009 EIR have not substantially changed, and no new conditions or more significant impacts that were not known, or could not have been known have occurred.

Analysis of Watson High Desert Logistics

Land Use and Population Considerations

The Project is permitted by the site's existing land use designations. The Project does not propose or require any General Plan or Specific Plan land use modifications. The Project would be subject to, and would be required to comply with, applicable land use plans, goals, policies, and regulations, including the General Plan, Municipal Code, as well as the NAVISP.

The Project does not include residential uses, and therefore would not directly induce substantial population growth. Job opportunities likely arising from the Project would include employment positions that are relatively common throughout Southern California and are unlikely to generate significant population migration (if any). Any Project-related employment demands would likely be filled by the available personnel pools within the Town and/or neighboring communities.

Additionally, the 2022 Apple Valley General Plan Housing Element states that "…16.6% of the Town's population works in Apple Valley. The remaining 83% work

elsewhere, which could suggest a jobs-housing imbalance within the Town limits." (Apple Valley, 2022, p. 22)

Based on the preceding, the Project represents industrial development anticipated by the 2009 General Plan and NAVISP, as evidenced by the existing land use designations of the Project sites. The planning and population implications associated with the Project were identified and analyzed within the 2009 EIR. Accordingly, the Project would not result in any new or increased significant impacts.

Airport Land Use Considerations

Certain information within the following discussions has been excerpted from the following analysis:

- *Airport Land Use Compatibility Analysis - Watson High Desert Logistics* (East and West Sites) (Johnson Aviation, Inc.) May 7, 2025.

This analysis is presented as *Appendix F* to this Addendum.

The Town's 1995 Draft Comprehensive Airport Land Use Compatibility Plan (CALUCP) is the most current airport compatibility planning document on airport land use compatibility matters. To ensure that the Project complies with CALUCP requirements, an Airport Land Use Compatibility Analysis (Johnson Aviation, 2025) has been conducted.

The CALUCP defines two Overlay Districts: District A-1, and District A-2, each with their own regulations and restrictions. The CALUCP also presents conceptual outlines of each Overlay District to aid in determining District boundaries. The applicability of each Overlay District to the Project sites are discussed below.

West Project Site

The West Project site is located outside of both Overlay Districts. The proposed building heights were submitted to the Federal Aviation Administration (FAA) for further obstruction evaluation, and the FAA issued a Determination Letter of No Hazard to Air Navigation on March 28, 2024 (Johnson Aviation, 2025). No conflicts would occur.

East Project Site

Overlay District A-1

The CALUCP describes the boundaries of Overlay District A-1 using text and figures. As presented in the Airport Land Use Compatibility Analysis prepared for the Project, the conceptual outline of the A-1 District, as presented graphically in the CALUCP, does not coincide with the described three-dimensional nature of the A-1 sloping surface. The Airport Land Use Compatibility Analysis graphically re-created the A-1 District boundaries using the definition and dimensions for the A-1 Overlay as presented in the text of Policy 8-1(B) of the CALUCP. Figure 19, *Airport Overlay,* illustrates the A-1 District Overlay boundary lines, as defined by Policy 8-1(B). As shown, based on the text of the CALUCP, the East Project site does not lie within the A-1 Overlay District (Johnson Aviation, 2025).

Regardless, the CALUCP defines the limits of the three-dimensional Overlay District A-1 using length, width, and slope down to the runway elevation. The relationship of the three-dimensional Overlay to the East Project site is presented in Table 16, *Airport Overlay District A-1 Clearance - East Project Site*.

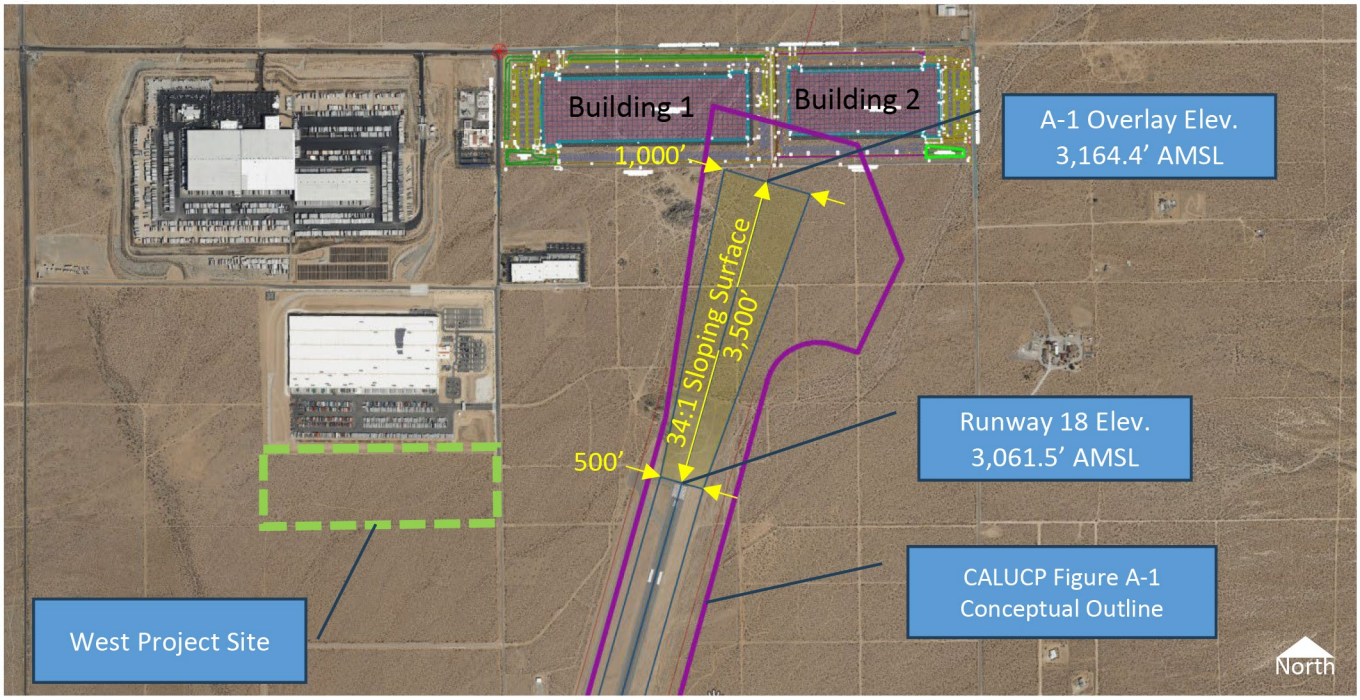
Table 16 Airport Overlay District A-1 Clearance - East Project Site

	Three-Dimensional Overlay Elevation[1]	Project Elevation[1]	Clearance Provided
Building 1	3,176.2’ AMSL	3,155’ AMSL	21.2’
Building 2	3,181.6’ AMSL	3,164’ AMSL	17.6’

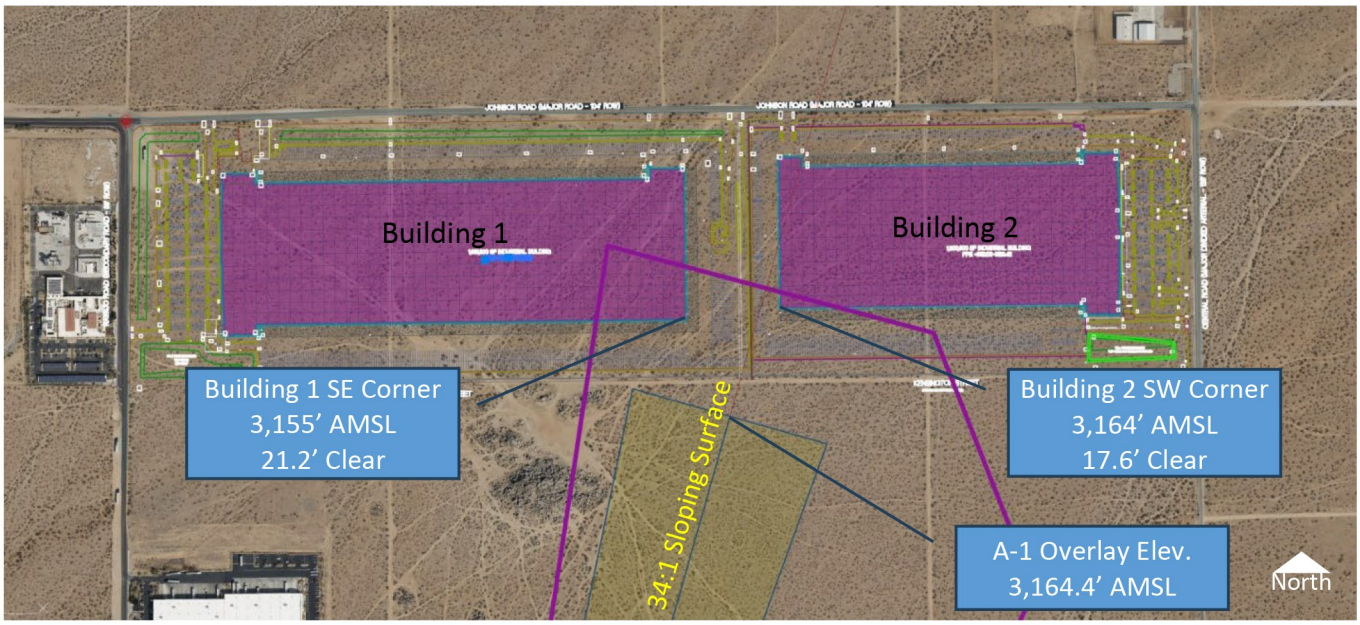
[1] Represents elevation at the closest points, which are the southeast corner of Building 1 and the southwest corner of Building 2.
Source: Johnson Aviation, 2025.

As shown above, the East Project site is not located within the three-dimensional overlay of the A-1 District.

As demonstrated above, using either the graphic re-creation presented in the Airport Land Use Compatibility Analysis or the dimensions presented in the CALUCP, the East Project site is clear of Overlay District A-1 (Johnson Aviation, 2025).



CALUCP Overlay District A-1 Consistent with Policy 8.1(B) Definition



CALUCP Overlay District A-1 Consistent with Policy 8.1(B) Definition (Project Overlay)

Source(s): Johnson Aviation, Inc. (05-07-2025)

Figure 19

Not to Scale

Airport Overlay

Overlay District A-2

A small portion of the East Project site lies within the Airport Overlay District A-2. Overlay District A-2 has occupancy limits for warehouse uses (150 persons per acre of property) intended to avoid excessive concentrations of people within the Overlay District. The average occupancy across the entire Project site would be less than 40 persons per acre of property. Therefore, the Project would satisfy the occupancy limitations for the A-2 District (Johnson Aviation, 2025).

The compatibility policies and criteria of Overlay District A-2 also seek to protect people on the ground from potentially harmful effects of exposure to high levels of aviation noise. The East Project site is located well outside of the lowest noise level identified for District A-2 (60 dB CNEL). At this low noise level, typical construction materials and techniques would be sufficient attenuate interior noise levels. Therefore, the Project would be compatible with the noise standards identified for the A-2 District (Johnson Aviation, 2025).

Overflight policies and criteria of Overlay District A-2 generally seek to address annoyance to people on the ground from the frequent presence of aircraft overhead, particularly in residential areas. From a land use planning perspective, the primary strategy for addressing overflight concerns is ensuring buyer awareness, rather than imposing direct restrictions on types of land uses. Given the Project's industrial use and compatibility with the underlying NAVISP designation, the Project would be consistent with the Airport Overlay District A-2 overflight policies (Johnson Aviation, 2025).

Protecting airports from airspace obstructions is accomplished by limiting the heights of structures and other objects. For the East Project site, a maximum height of 50 feet is permitted. Structures or objects in excess of these heights shall be subject to discretionary review as to whether they would conflict with FAA Regulations Part 77 or impede visibility or access to open areas providing emergency landing areas for aircraft. The proposed building height would be a maximum of 49 feet from the finished floor elevation to the top of roof deck. Architectural features, which are not calculated as part of the maximum building height, would be a maximum of 3 feet above the roof deck. Additionally, mature heights of vegetation proposed by the Project would not exceed the building height. The proposed building heights for the East Project site were submitted to the FAA for further obstruction evaluation and the FAA issued a Determination Letter of No Hazard to Air Navigation on July 26, 2024 (Johnson

Aviation, 2025). Table 17, *Overlay District A-2 Consistency Summary – East Project Site* summarizes the consistency of the East Project site with Overlay District Guidelines.

Table 17 Overlay District A-2 Consistency Summary – East Project Site

Overlay District A-2 Guidelines		Project Consistency
Recommended maximum population density for non-residential uses	150 persons per acre	**No Conflict.** Average occupancy per acre for the East Project would be 38.3 persons.[1]
Maximum coverage by structures	Building envelope and lot coverage must comply with the underlying zoning district.	**No Conflict.** Under the site's existing NAVISP land use designations, the East Project site is permitted a maximum building coverage of 2,979,504 square feet. As proposed, building coverage would be 2,832,600 square feet.[2]
Land Use Restrictions	No schools (not including trade schools), preschools, daycare centers, hospitals, community congregate, residential care facilities, concert halls, auditoriums, churches, stadiums, or arenas.	**No Conflict.** The Project does not propose any prohibited land uses.
Height Limitations	50 feet	**No Conflict.** Proposed buildings would be a maximum height of 49 feet above finished floor elevation.

Source: Apple Valley Comprehensive Airport Land Use Plan (1995).
[1] Per Caltrans Divion of Aeronautics, Building Code Method. (Warehouse occupancy = 500 sf/person; Office occupancy = 100 sf/person x 50%)
2 Per the NAVISP, permitted building coverage is 45% for I-SP. The East Project (2,832,600 on 152 acres) would result in a building coverage of 42.7%.

General Plan Considerations

The Town of Apple Valley General Plan includes Policy 7.C and related Program 7.C.1, which apply to lands surrounding the Airport:

> Policy 7.C The long-term economic growth of the Apple Valley Airport shall be protected.
>
> Program 7.C.1 Development proposals within the influence area of the Apple Valley Airport shall be required to comply with FAA and County standards.

The NAVISP was prepared to establish long-term development goals, standards and guidelines for areas surrounding the Airport. The primary land uses envisioned for this area are industrial and commercial land uses, which will provide the Town with long-term economic growth and vitality, job growth, and revenue. Development of the Project would implement the goals of the NAVISP, thus helping to ensure the long-term

economic growth of the Apple Valley Airport. Additionally, as evidenced by the Determination Letters of No Hazard to Air Navigation issued by the FAA for the Project, the Project would comply with FAA standards.

Development Code Considerations

Development Code Chapter 9.65, Airport Overlay Districts, sets forth goals and regulations aimed at protecting public health and safety, and encouraging compatible development in areas surrounding the Airport. An analysis of the Project's consistency with the criteria set forth in Chapter 9.65.010 is presented below. As shown on Table 18, *Development Code Airport Consistency – East Project Site*, the Project would not conflict with the Development Code.

Table 18 Development Code Airport Consistency – East Project Site

Chapter 9.65.010	Project Consistency
Goals	
1.Safeguarding the general welfare of the inhabitants within the vicinity of the airport and the public in general by minimizing public exposure to excessive noise and safety hazards.	**No Conflict.** Industrial development is not a noise sensitive use. Additionally, the Project would not attract large amounts of people, thus minimizing potential safety hazards to the public.
2.Coordinating land uses both on the airport property and in surrounding areas so that land uses are compatible and able to function without major constraints or annoyance.	**No Conflict.** The Project is consistent with the type of development envisioned by the NAVISP, and as such, represents compatible development.
3.Promote commercial and industrial developments that are capable of strengthening the local economy and enhancing the quality of life of Town residents.	**No Conflict.** The Project represents industrial development that would help strengthen the local economy.
4.Ensure that land use conflicts are minimized and that long term interest for industrial projects are maintained.	**No Conflict.** The Project helps to minimize land use conflicts by implementing industrial development in an area designated for such uses.
5.Encourage long-term investment in the community.	**No Conflict.** Development of the Project site represents a long-term investment in the community.
6.Protect adjacent property owners from negative impacts.	**No Conflict.** The Project helps achieve this goal by implementing a land use that is less sensitive to the potential negative impacts that can result from being located adjacent to an airport.
Regulations	
1.All uses shall be compatible with the continued operation of the airport. No uses shall be allowed that: a. Release into the air any substance that would impair aircraft visibility or otherwise interfere with its operation; b. Produce light emissions, either direct or reflective, that would interfere with pilot vision; c. Produce emissions that would interfere with aircraft communication systems or navigational equipment; or d. Attract birds or water fowl in such numbers as would create a hazard to aircraft operations.	**No Conflict.** The Project has been designed to be compatible with the continued operation of the Airport. No aspect of the Project would impair aircraft visibility or pilot vision or interfere with aircraft communication systems or navigational equipment. Detention basins to be implemented by the Project have been designed with a drawdown time of 48 hours after a storm event, ensuring standing water does not attract birds or water fowl.

Chapter 9.65.010	Project Consistency
2.Uses that cause or produce objectionable effects that would pose a hazard or nuisance to adjacent or other properties by reason of smoke, soot, dust, radiation, odor, noise, vibration, heat, glare, toxic fumes or other conditions that would adversely affect the public health, safety and general welfare are not permitted.	**No Conflict.** The Project does not propose uses that would pose a hazard or nuisance to the airport that would adversely affect the public health, safety and general welfare.
3.Uses that require the use or storage of materials that are explosive, flammable, toxic, corrosive, or otherwise exhibit hazardous characteristics shall be approved by the Fire District and the County Department of Environmental Health Services.	**No Conflict.** Although these types of uses are not anticipated, the Project is speculative. Should the end user store or use these types of materials, all Fire District and the County Department of Environmental Health Services regulations would be followed.
4.Uses that are labor intensive or that promote the concentration of people for extended periods of time are not permitted in areas designated by the Airport Overlay District.	**No Conflict.** As previously discussed, the Project would not exceed the recommended maximum population density.
5.Structures on the premises of a permitted use shall not be used as a residence for the owner, operator, or caretaker, their family members or others.	**No Conflict.** No Project structures would be used as residences.
6.A noise level reduction (NLR) of thirty (30) decibels or more from exterior to interior shall be incorporated into the design and construction of office areas and those portions of structures where the public is regularly received. All interior noise level standards shall be met.	**No Conflict.** Appropriate noise reduction would be achieved by standard building practices. No portions of the Project include areas where the public is regularly received.

Conclusion

Based on the preceding discussions, the East Project site would be clear of Overlay District A-1 and consistent with the CALUCP requirements of Overlay District A-2. The West Project site is unaffected by the Overlay Districts. The Project as a whole would be consistent with applicable General Plan and Development Code considerations regarding Airport compatibility. Accordingly, the Project would not result in any new or increased significant impacts.

J. Mineral Resources

Summary of Findings in the 2009 EIR

Mineral resources located within the Town of Apple Valley are found primarily along or near the Mojave River or in the surrounding mountains, and include sand, gravel, and stone deposits that are suitable as sources of concrete aggregate. The Town has designated 452.5 acres for mineral resources land use. Of this, approximately 111.56 acres were developed for mining and processing of aggregate materials, and the remaining 340.95 acres were designated for the use and production of such resources. Mining activities may be incompatible with surrounding land uses, as dust, noise, and

heavy truck traffic may create conflicts with residential and commercial uses. Application of the following mitigation, as well as the Town's land use policies, would reduce potential impacts from adjacent conflicting land uses to less than significant levels.

2009 EIR Mitigation Measures

1. The Town will allow aggregate, limestone and other mineral resource extractions only in cases where all residual hazards to public health and safety are effectively mitigated.

2. Development proposals adjacent to lands designated for Mineral Resources shall be reviewed to assure the inclusion of adequate buffering.

3. The Town shall cooperate with the Mojave Desert Air Quality Management District to ensure mineral extraction operations' compliance with air quality standards.

4. The Town shall coordinate closely with San Bernardino County and the State Department of Mines and Geology to assure that reclamation plans are current and adequately implemented at existing mining operations.

Comparison of 2009 GP EIR vs 2024 Industrial Lands Buildout

The 2009 EIR analyzed the mineral resource impacts associated with buildout of the Town consistent with the General Plan. Since that time, there have been no substantial General Plan Amendments that would change the intensity of development or the mix of land uses. As such, impacts on mineral resources as described in the 2009 EIR have not substantially changed, and no new conditions or more significant impacts that were not known, or could not have been known have occurred.

Analysis of Watson High Desert Logistics

As shown on Exhibit III-16 of the Town General Plan, the Project sites are designated MRZ-3a (areas containing known mineral occurrences of undetermined mineral resource significance). No known State-designated mineral resource areas have been identified within the Project sites or surrounding areas. The Project does not include mineral development activities. Further, implementation of the Project would not

impede the potential for direct use or future exploration of mineral resources. The Project would not create any new impacts beyond those identified in the 2009 EIR.

Implementation of the proposed Project would not result in any new impacts or increase the severity of a previously identified significant impact as previously analyzed in the 2009 EIR. Overall impacts are expected to be the same as those previously identified in the 2009 EIR. Therefore, implementation of the proposed Project would not result in any new adverse impacts or increase the severity of previously identified significant impacts in the Certified EIR.

K. Noise

Summary of Findings in the 2009 EIR

Sources of noise in the Town include motor vehicle traffic on highways and major arterials, including U.S. Interstate 15, which forms a portion of the Town's northwest boundary and the westerly boundary of both annexation areas. Other noise generators in the local environment include operations associated with general aviation aircraft at the Apple Valley Airport, and rail lines that serve local and regional mineral extraction operations.

There are a variety of noise sensitive land uses throughout the General Plan planning area, including but not limited to schools, hospitals, rest homes, long-term care facilities, residential uses, places of worship, libraries, and passive recreation areas. Potential land use incompatibilities related to noise occur when residential areas or other sensitive receptors are located in proximity to industrial and commercial uses.

Temporary Noise Increases

The 2009 EIR identified noise reducing methods available to reduce construction noise impacts, particularly noise generated adjacent to sensitive receptors. The 2009 EIR included Mitigation Measures 10 through 12, which require that construction equipment be equipped with mufflers, that stationary equipment be located away from sensitive receptors, and that construction hour limitations be enforced. The 2009 EIR concluded that with the implementation of these mitigation measures, construction impacts associated with buildout of the General Plan and annexation areas would be less than significant.

Permanent Noise Increases

The 2009 EIR considered noise levels at General Plan buildout and found that noise levels would increase substantially over the ambient noise levels at the time, particularly along major Town roadways. Overall increases were determined to be significant and required mitigation. Mitigation Measures 6, 7 and 8, which require the preparation of site-specific noise analyses for projects proposed adjacent to residential land uses, the siting of sensitive receptors away from noise generators, and the routing of traffic to major roadways to preserve residential neighborhoods' quiet environment, respectively.

Airport Operations

The 2009 EIR analyzed noise associated with the Apple Valley Airport and concluded that the 65 and 60 dBA CNEL noise levels associated with Airport operations were all contained within the Airport property. In addition, the land uses proposed around the Airport in the NAVISP were less sensitive commercial and industrial uses. The 2009 EIR concluded that Apple Valley Airport would have less than significant impacts on the Town's noise environment.

Conclusion

The 2009 EIR determined that the proposed General Plan and annexations would result in increases to community noise levels from increased urbanization and associated activities, including short-term construction noise and increases in motor vehicle traffic. These increases could be potentially significant. As such, site-specific impacts would be mitigated on a project-by-project basis at the time such development was proposed. The 2009 EIR proposed broad-based mitigation intended to reduce noise impacts to acceptable levels.

2009 EIR Mitigation Measures

1. The Town shall continue to maintain and enforce its noise ordinance to ensure that noise impacts throughout the General Plan area are maintained at acceptable levels.

2. The Town shall continue to require that all project designs comply with Title 25 (California Noise Insulation Standards) by ensuring that interior noise levels for residential development do not exceed 45 dBA.

3. Final site plans for all proposed development projects in the General Plan area shall consider potential noise impacts, including residential site-orientation to shield outdoor living areas, incorporating additional setbacks from roadways, and constructing additional noise barriers where necessary.

4. All development shall be designed to include and comply with requirements of State Code for lateral and vertical unit-to-unit airborne sound isolation. For multi-family residential and hotel development, design shall include vertical impact sound isolation.

5. Project-specific development shall prepare construction drawings to determine exact specifications for window glass in buildings with unshielded first and second story windows.

6. The Town shall require an acoustical analysis for all commercial and industrial projects that are proposed adjacent to residential land uses or land use designations. The acoustical analysis shall evaluate potential noise impacts of the project and provide mitigation measures that are adequate to meet Town noise standards for residential land uses.

7. Sensitive receptors, which include schools, libraries and hospitals, shall, to the greatest extent feasible, be located away from major noise generators.

8. The Town shall encourage a planning area-wide circulation pattern that loads primary traffic onto major arterials in order to limit local roadway traffic to the greatest extent feasible and thereby preserve local neighborhood noise environments.

9. The Town shall evaluate and monitor noise impacts associated with the addition of bus routes and bus stops near noise sensitive uses, in particular stops to be located along collector and local roads.

10. All construction equipment operating in the General Plan area shall be equipped with properly operating and well-maintained mufflers to limit noise emissions.

11. To the greatest extent feasible, earth moving and hauling routes, and stockpiling and vehicle staging areas shall be situated away from existing residences.

12. Construction activities shall be conducted in compliance with the Town's Noise Ordinance to ensure that acceptable noise levels are achieved during sensitive time periods.

13. Mechanical equipment for various buildings within the General Plan area shall be designed, selected and placed in consideration of the potential noise impacts on nearby residences within any development and in the surrounding community.

14. Appropriate sound barriers shall surround all public facilities generating disturbing levels of noise, such as water pumping stations.

15. Outdoor equipment such as cooling towers, air cooled condensers and refrigeration compressors and/or condenser units, as well as at air intake and discharge openings for building ventilation systems, shall be provided with silencers and/or barriers at or surrounding them, where necessary.

Comparison of 2009 GP EIR vs 2024 Industrial Lands Buildout

The 2009 EIR analyzed the noise impacts associated with buildout of the Town consistent with the General Plan. Since that time, there have been no substantial General Plan Amendments that would change the intensity of development or the mix of land uses. As such, noise impacts as described in the 2009 EIR have not substantially changed, and no new conditions or more significant impacts that were not known or could not have been known have occurred.

Analysis of Watson High Desert Logistics

The following discussions are based on information presented in the following document:

- *Watson High Desert Logistics Noise and Vibration Analysis, Town of Apple Valley* (Urban Crossroads, Inc.) December 23, 2024.

The Noise and Vibration Analysis, presented as *Appendix G* to this Addendum, utilizes the following criteria for the evaluation of Project noise impacts as shown on Table 19, *Significance Criteria Summary*:

Table 19 Significance Criteria Summary

Analysis	Receiving Land Use	Condition(s)	Significance Criteria	
			Daytime	Nighttime
Off-Site Traffic	Noise-Sensitive	If ambient is < 60 dBA CNEL	≥ 5 dBA CNEL Project increase	
		If ambient is 60 - 65 dBA CNEL	≥ 3 dBA CNEL Project increase	
		If ambient is > 65 dBA CNEL	≥ 1.5 dBA CNEL Project increase	
	Non-Noise-Sensitive	If ambient is > 75 dBA CNEL	≥ 3 dBA CNEL Project increase	
Operational	Noise-Sensitive	Exterior Noise Level Standards	50 dBA L_{eq}	40 dBA L_{eq}
		If ambient is < 60 dBA L_{eq}	≥ 5 dBA L_{eq} Project increase	
		If ambient is 60 - 65 dBA L_{eq}	≥ 3 dBA L_{eq} Project increase	
		If ambient is > 65 dBA L_{eq}	≥ 1.5 dBA L_{eq} Project increase	
Construction	Noise-Sensitive	Noise Level Threshold	75 dBA L_{eq}	60 dBA L_{eq}
		Vibration Level Threshold	0.04 PPV (in/sec)	

Source: Urban Crossroads, 2024a.

Construction Noise

Construction stages associated with the Project include site preparation, grading, building construction, paving, and architectural coating. The Noise Impact Analysis identifies six receivers in the vicinity of the Project sites that may be subject to Project-related noise (refer to Noise Impact Analysis Exhibit 8-A). Using reference noise levels published by the Federal Highway Administration, calculations of the Project construction noise level impacts at the nearby sensitive receiver locations were completed and are summarized below in Table 20, *Project Sites Construction Noise Levels*.

Table 20 Project Sites Construction Noise Levels

Receiver Location	Construction Noise Levels (dBA L_{eq})		
	Highest Construction Noise Levels	Threshold	Threshold Exceeded?
R1	47.8	75	No
R2	48.1	75	No
R3	44.1	75	No
R4	51.0	75	No
R5	47.0	75	No
R6	43.9	75	No

Source: Urban Crossroads, 2024a.

In addition to the typical daytime construction activities analyzed above, nighttime concrete pouring activities would occur as a part of Project building construction activities. Nighttime concrete pouring activities are often used to support reduced concrete mixer truck transit times and lower air temperatures than during the daytime hours and are generally limited to the actual building pad area. Since the nighttime concrete pours will take place outside the hours permitted by Section 9.73.060 of the Municipal Code, the Project Applicant would be required to obtain authorization for nighttime work from the Town. Noise levels associated with nighttime concrete pouring activities are presented in Table 21, *Nighttime Concrete Pour Noise Levels*.

Table 21 Nighttime Concrete Pour Noise Levels

Receiver Location	Concrete Pour Construction Noise Levels (dBA L_{eq})		
	Exterior Noise Levels	Threshold	Threshold Exceeded?
R1	32.5	60	No
R2	32.8	60	No
R3	28.8	60	No
R4	35.7	60	No
R5	31.7	60	No
R6	28.6	60	No

Source: Urban Crossroads, 2024a.

Construction activity can result in varying degrees of ground vibration, depending on the equipment and methods employed. Table 22, *Project Construction Vibration Levels* presents the expected Project-related vibration levels at the nearby receiver locations.

Table 22 Project Construction Vibration Levels

Location	Distance to Const. Activity (Feet)	Typical Construction Vibration Levels PPV (in/sec)						Thresholds PPV (in/sec)	Thresholds Exceeded?
		Small bulldozer	Jack-hammer	Loaded Trucks	Large bulldozer	Vibratory Roller	Highest Vibration Level		
R1	2,083'	0.000	0.000	0.000	0.000	0.000	0.000	0.004	No
R2	2,217'	0.000	0.000	0.000	0.000	0.000	0.000	0.004	No
R3	4,955'	0.000	0.000	0.000	0.000	0.000	0.000	0.004	No
R4	2,361'	0.000	0.000	0.000	0.000	0.000	0.000	0.004	No
R5	2,880'	0.000	0.000	0.000	0.000	0.000	0.000	0.004	No
R6	4,899'	0.000	0.000	0.000	0.000	0.000	0.000	0.004	No

Source: Urban Crossroads, 2024a.

Based on the distance to the receiver locations, construction vibration velocity levels are estimated at less than 0.001 in/sec PPV.

As shown in the preceding tables, noise and vibration levels associated with construction of the Project would not exceed applicable thresholds at any of the vicinity sensitive receptors. Construction noise would be less than significant.

Operational Noise

Sources of operational noise would include loading dock activity, tractor trailer storage activity, roof-top air conditioning units, parking lot vehicle movements, trash enclosure activity, and truck movements. Table 23, *Operational Noise Level Compliance* presents the daytime and nighttime Project-generated noise levels at each of the vicinity receivers and provides a comparison to Town thresholds.

Table 23 Operational Noise Level Compliance

Receiver Location	Project Operational Noise Levels (dBA Leq)		Noise Level Standards (dBA Leq)		Noise Level Standards Exceeded?	
	Daytime	Nighttime	Daytime	Nighttime	Daytime	Nighttime
R1	40.6	40.5	50	45	No	No
R2	41.2	41.2	55	45	No	No
R3	36.7	36.7	55	50	No	No
R4	41.5	41.4	65	55	No	No
R5	37.4	37.4	60	50	No	No
R6	36.9	36.9	60	50	No	No

Source: Urban Crossroads, 2024a.

To describe the Project operational noise level increases, the Project operational noise levels are combined with the existing ambient noise levels measurements for the nearby receiver locations that may be potentially impacted by Project operational noise sources. Table 24, *Daytime Operational Noise Level Increases* and Table 25, *Nighttime Operational Noise Level Increases* present the daytime and nighttime levels increases associated with the Project.

Table 24 Daytime Operational Noise Level Increases

Receiver Location	Total Project Operational Noise Level	Measurement Location	Reference Ambient Noise Levels	Combined Project and Ambient	Project Increase	Increase Criteria	Increase Criteria Exceeded?
R1	40.6	L1	50.0	50.5	0.5	5.0	No
R2	41.2	L2	52.3	52.6	0.3	5.0	No
R3	36.7	L3	54.9	55.0	0.1	5.0	No
R4	41.5	L4	60.9	60.9	0.0	3.0	No
R5	37.4	L5	58.5	58.5	0.0	5.0	No
R6	36.9	L6	60.9	60.9	0.0	3.0	No

Source: Urban Crossroads, 2024a.

Table 25 Nighttime Operational Noise Level Increases

Receiver Location	Total Project Operational Noise Level	Measurement Location	Reference Ambient Noise Levels	Combined Project and Ambient	Project Increase	Increase Criteria	Increase Criteria Exceeded?
R1	40.5	L1	40.2	43.4	3.2	5.0	No
R2	41.2	L2	44.4	46.1	1.7	5.0	No
R3	36.7	L3	48.1	48.4	0.3	5.0	No
R4	41.4	L4	50.3	50.8	0.5	5.0	No
R5	37.4	L5	47.1	47.5	0.4	5.0	No
R6	36.9	L6	60.8	60.8	0.0	3.0	No

Source: Urban Crossroads, 2024a.

Based on the preceding analysis, operational noise levels associated with the Project would not exceed applicable thresholds at any of the vicinity sensitive receptors. Nor would Project-related noise levels result in a significant increase over existing ambient noise levels. Operational noise would be less than significant.

Off-Site Traffic Noise

Off-site traffic noise impacts are evaluated based on a comparison of the Project traffic noise levels to the General Plan Buildout conditions outlined in the 2009 EIR.

Noise contours were used to assess the Project's incremental 24-hour dBA CNEL traffic-related noise impacts at land uses adjacent to roadways conveying Project traffic (refer to Noise Analysis Tables 7-1 through 7-3). Consistent with the *Watson High Desert Logistics Traffic Analysis*, the Project truck trips will be primarily limited to the

major roadways that include Dale Evans Parkway, Central Road, Stoddard Wells Road, Johnson Road and Corwin Road. Based on the noise contours, Table 26, *Off-Site Traffic Noise Level Summary* compares the Projects off-site traffic noise levels to those assumed in the 2009 EIR for General Plan buildout.

Table 26 Off-Site Traffic Noise Level Summary

ID	Road	Segment	CNEL at Receiving Land Use (dBA)			Exceeds General Plan Buildout Noise Levels
			Existing W/ Project	Opening Year W/ Project	General Plan Buildout	
1	Dale Evans Pkwy.	n/o Stoddard Wells Rd.	70.1	71.9	76.7	No
2	Dale Evans Pkwy.	s/o Stoddard Wells Rd.	70.1	71.9	76.5	No
3	Dale Evans Pkwy.	n/o Johnson Rd.	70.0	70.5	77.9	No
4	Dale Evans Pkwy.	n/o Corwin Rd.	65.7	68.3	76.1	No
5	Dale Evans Pkwy.	s/o Corwin Rd.	64.2	66.3	74.4	No
6	Central Rd.	s/o Johnson Rd.	69.5	71.5	74.0	No
7	Central Rd.	n/o Waalew Rd.	65.3	68.0	74.9	No
8	Central Rd.	s/o Waalew Rd.	65.7	67.6	76.1	No
9	Navajo Rd.	s/o Johnson Rd.	71.8	72.1	76.6	No
10	Stoddard Wells Rd.	s/o Johnson Rd.	69.8	73.2	76.6	No
11	Johnson Rd.	w/o Dale Evans Pkwy.	70.5	74.0	74.2	No
12	Johnson Rd.	e/o Dale Evans Pkwy.	74.3	76.4	77.2	No
13	Johnson Rd.	w/o Central Rd.	70.2	72.9	76.8	No
14	Corwin Rd.	w/o Dale Evans Pkwy.	63.0	66.2	73.3	No

Source: Urban Crossroads, 2024a.

As shown above, the with-Project conditions will not exceed the approved General Plan off-site traffic noise conditions.

Conclusion

As discussed above, neither construction-related nor on-site operational noise impacts of the Project would be significant. Additionally, as summarized in Table 26 above, off-site traffic noise levels would not exceed those identified and analyzed within the 2009 EIR. To further reduce potential Project-related noise, the Project would be subject to the following applicable mitigation measures from the 2009 EIR.

1. The Town shall continue to maintain and enforce its noise ordinance to ensure that noise impacts throughout the General Plan area are maintained at acceptable levels.

2. The Town shall continue to require that all project designs comply with Title 25 (California Noise Insulation Standards) by ensuring that interior noise levels for residential development do not exceed 45 dBA.

3. Final site plans for all proposed development projects in the General Plan area shall consider potential noise impacts, including residential site-orientation to shield outdoor living areas, incorporating additional setbacks from roadways, and constructing additional noise barriers where necessary.

4. All development shall be designed to include and comply with requirements of State Code for lateral and vertical unit-to-unit airborne sound isolation. For multi-family residential and hotel development, design shall include vertical impact sound isolation.

5. Project-specific development shall prepare construction drawings to determine exact specifications for window glass in buildings with unshielded first and second story windows.

10. All construction equipment operating in the General Plan area shall be equipped with properly operating and well-maintained mufflers to limit noise emissions.

11. To the greatest extent feasible, earth moving and hauling routes, and stockpiling and vehicle staging areas shall be situated away from existing residences.

12. Construction activities shall be conducted in compliance with the Town's Noise Ordinance to ensure that acceptable noise levels are achieved during sensitive time periods.

13. Mechanical equipment for various buildings within the General Plan area shall be designed, selected and placed in consideration of the potential noise impacts on nearby residences within any development and in the surrounding community.

15. Outdoor equipment such as cooling towers, air cooled condensers and refrigeration compressors and/or condenser units, as well as at air intake and discharge openings for building ventilation systems, shall be provided with silencers and/or barriers at or surrounding them, where necessary.

Based on the preceding, implementation of the proposed Project would not result in any new significant impacts or increase the severity of a previously identified significant impact as previously analyzed in the 2009 EIR.

L. Public Services

Summary of Findings in the 2009 EIR

The following discussions summarizes impacts to schools, libraries, law enforcement, fire protection, health care services, electricity, natural gas, telephone/internet, domestic water services, wastewater collection and treatment, and solid waste management, as identified in the 2009 EIR.

Schools

The Apple Valley Unified School District (AVUSD) serves the Town, portions of its Sphere of Influence, and the annexation areas. Buildout of the General Plan and annexation areas could generate a substantial increase in student enrollment in public schools and thereby have a potentially significant impact on AVUSD schools in the area. However, the 2009 EIR concluded that the continued assessment Developer Impact Fees and proposed mitigation would ensure impacts would be less than significant.

Libraries

The Newton T. Bass Apple Valley Library, which is part of the San Bernardino County Library System, is a 19,142 square foot facility located adjacent to Town Hall off of Dale Evans Parkway. The 2009 EIR determined that approximately 87,719 square feet of library facilities would be needed to serve the General Plan and annexation areas buildout population. With the implementation of mitigation measures, impacts to library services were found to be less than significant.

Police Protection Services

The Town of Apple Valley contracts with the San Bernardino County Sheriff's Department for law enforcement services. The Apple Valley Police Department is located in the Apple Valley Civic Center at 14931 Dale Evans Parkway. There is also an un-staffed substation used for report writing and other administrative tasks located at 21989 Outer State Highway 18. At the time of the 2009 EIR, staffing at the Apple Valley Police Department consisted of 49 sworn personnel and 14 civilian/general employees. The Department had set a target ratio of 1 deputy per 1,500 residents.

To maintain the target ratio at General Plan buildout, a total of 130 deputies would be required, which is an increase of 81 deputies as compared with 2009 staffing levels. The 2009 EIR proposed mitigation to preclude significant impacts regarding the provision of law enforcement services.

Fire Protection

The Town of Apple Valley receives fire protection services from the Apple Valley Fire Protection District (AVFPD). AVFPD is an independent District that serves the Town and unincorporated areas of San Bernardino County. The District's approximately 206 square mile service area extends easterly from the Mojave River as far as the dry lakes toward Lucerne Valley.

The 2009 EIR determined that the increased population from buildout of the 2009 General Plan and Annexation areas would increase demand for fire protection services over current staffing. The 2009 EIR proposed mitigation to preclude significant impacts regarding the provision of fire protection services.

Health Care Services

The 2009 EIR described the existing health care services in the Town, including the St. Mary Medical Center, private practices, and hospitals in the vicinity of the planning area. The 2009 EIR found that buildout of the General Plan and annexation areas would impact the demand for health care services. However local and regional medical care facilities are privately operated and would continue to plan for growth. Therefore, no mitigation measures were proposed.

Electricity

Southern California Edison (SCE) provides electrical service to the General Plan and annexation areas and had four major electric transmission corridors in the region, each with 115kV lines, at the time the 2009 EIR. Buildout of the proposed General Plan and annexation areas was estimated to result in electrical consumption of 1,807,978,891 kilowatt-hours per year (kwh/year). Of this amount, 353,683,749 kwh/year would be for residential uses, 924,262,572 kwh/year would be for commercial uses, and 525,032,571 kwh/year would be used by industrial establishments.

The 2009 EIR determined the expansion of electricity services was expected to occur over time, and SCE's rate structures include expansion of facilities, therefore impacts would not be significant, and no mitigation measures were required.

Natural Gas

The Southwest Gas Company provides natural gas service to the Town and its planning area through a series of pipelines of differing sizes and pressure capabilities. Transmission, supply, and distribution lines provide service to most portions of the Town and its Sphere of Influence.

At the time 2009 EIR was certified, natural gas was not provided in some areas within the service area; these included those without existing facility extensions, undeveloped areas, or extremely rural areas. Southwest Gas Company indicated that it would accommodate new development in the planning area by working closely with developers to build extensions for build out areas. Where natural gas services and facilities were not available, propane was utilized as an alternative source of fuel.

Total development at General Plan buildout (including annexation areas) is projected to consume about 779,089,325 cubic feet per month, including residential, commercial and industrial uses. The 2009 EIR determined the expansion of natural gas services was expected to occur over time, and Southwest Gas Company's rate structures include expansion of facilities, therefore impacts would not be significant, and no mitigation measures were required.

Telephone, Internet, and Television Service

Buildout of the General Plan and annexation areas would result in increased demand for telephone, internet and television services and thereby the facilities and equipment owned and maintained by Verizon and Charter Communications. As expansion of telephone service is expected to occur over time, and Verizon's and Charter's rate structure includes expansion of facilities. As such, the 2009 EIR determined no significant impact is expected, and no mitigation measures are required.

Water Services

Buildout of the General Plan and annexation areas would result in an estimated water demand 95,999 acre-feet per year for all types of development. The 2009 EIR noted there areas not currently served by local water purveyors, including the annexation areas, and thus implementation would require the extension of infrastructure as necessary to provide domestic water service to future development. The 2009 EIR set forth mitigation measures requiring that the Town and applicable water purveyors monitor growth in these areas and plan for the future extension of infrastructure, precluding significant impacts in this regard.

Wastewater Collection and Treatment

On December 13, 1977, the former Apple Valley Water District (AVWD) entered into a Joint Powers Authority (JPA) agreement with the Victor Valley Wastewater Reclamation Authority (VVWRA). The Town of Apple Valley is the successor agency to the AVWD. The JPA agreement was amended and reinstated on December 15, 1998. VVWRA, per agreement, is responsible for the collection and treatment of the Town's wastewater; however, the Town still maintains full ownership, operation, and maintenance for the Town's sewer system.

The Town operates the local wastewater collection system in accordance with the plans and projections contained in the Town's Sewer Master Plan. At the time of the 2009 EIR, approximately 30 percent of development in the Town was connected to sewer facilities. The Town's local conveyance system connects to regional intercept lines that convey wastewater to a wastewater treatment plant operated by the VVWRA in Victorville.

The 2009 EIR estimated domestic wastewater flows would average approximately 100 gallons per capita per day. Applying this factor to the estimated buildout population of 194,931, wastewater generation in the General Plan and annexation areas would be approximately 19,493,069 gallons per day. The 2009 EIR determined that this increase in wastewater generation and demand for collection and treatment facilities was significant when compared with the current level of service. While development would occur gradually over time, the 2009 EIR determined the Town would need to continue to monitor growth trends in the planning area to ensure the adequate provision of wastewater treatment facilities and to secure funding for their construction through connection fees. Mitigation was proposed to preclude significant impacts.

Solid Waste Management

The Town of Apple Valley contracts with Burrtec Waste Industries for the collection and disposal of solid waste. Solid waste collected by Burrtec is hauled to the Victorville landfill, approximately 12 miles to the northwest, which is a San Bernardino County landfill.

The operating permit for the Victorville landfill allows for a maximum of 3,000 tons a day. During the time period of 2009 EIR preparation, average throughput ranged from 900 tons per day to approximately 1,400. Buildout of the General Plan and annexation areas was expected to generate a total of approximately 950,712 tons of solid waste per year, or 2,603 tons per day. Mitigation measures were proposed to address this increase and preclude significant impacts.

2009 EIR Mitigation Measures

School

1. Statutory school mitigation fees for residential and commercial development shall continue to be assessed to developers.

2. Should developers in the General Plan study area use Mello-Roos or other types of public facilities financing districts, AVUSD shall be included in discussions to determine how the developer may cooperate with the District in its funding mechanism. The following alternatives are available to AVUSD to mitigate significant impacts to District schools:

a. Leroy F. Green State School Building Lease-Purchase Law: Under an agreement between the school district and the State of California, this Act provides for construction, reconstruction or replacement of school facilities by the State Allocation Board. Districts with 1) substantial enrollment in year-round schools, 2) the ability to raise a percentage of project costs, and 3) opening a new facility as a year-round school receive first priority for future State funding.

b. Lease-Purchase Arrangements: Lease-purchase agreements may be made between school districts and private builders of portable classrooms, as authorized under Sections 39240 and 39290 of the State Education Code. Under this method, school districts can also finance capital outlay. Lease-purchase agreements also provide the benefit of offering long-term financing without the need for voter approval of special taxes or benefit assessments.

c. Developer Fees: Assembly Bill 2926 (Chapter 887) was approved by the State Legislature in 1986, authorizing school districts to assess development fees to fund school construction or reconstruction. Currently these fees are $3.60 per square foot of residential construction and $0.47 per square foot of commercial construction. Under Government Code Section 53080, proof of compliance with the school district's resolution may be required prior to issuance of building permits.

d. Mello-Roos Community Facilities Act: Government Code Section 55311, et. seq., establishes provisions for this funding option. In order to benefit from this Act, a school district is responsible to initiate proceedings to declare itself a "Community Facilities District" (CFD), which is defined as a government entity created to perform specific activities within set boundaries. It provides for the CFD to purchase, construct or rehabilitate real or tangible property with an estimated useful life of five years or longer.

Library

1. The Town and the County of San Bernardino shall, by continuing to monitor and evaluate library usage rates and the level of service provided at County libraries in the General Plan area, determine the need for additional services and facilities.

2. In order to determine appropriate mitigation fees necessary to provide adequate library services, the Town shall continue to consult and coordinate with San Bernardino County, and consider the addition of library facilities to Developer Impact Fees in the future.

Police Protection

1. New development projects shall be reviewed by the Sheriff's Department to ensure the Department's ability to provide adequate police protection. New developments shall comply with established Sheriff's Department standards.

2. The Town shall continue to monitor Town population and Sheriff's Department staffing levels to ensure that sufficient levels of police protection are afforded.

Fire Protection

1. The Town shall continue to coordinate closely with the Apple Valley Fire Protection District to assure the timely expansion of facilities and services.

2. The Town and Apple Valley Fire Protection District shall continue to enforce fire codes and other applicable standards and regulations as part of building plan review and conducting building inspections.

3. Industrial facilities that involve the storage of hazardous, flammable or explosive materials shall be sited so as to ensure the highest level of safety in strict conformance with Uniform Fire Code and other applicable codes and regulations.

4. The Apple Valley Fire Protection District shall continue to review new development proposals and evaluate project plans to assure that it can provide adequate fire protection.

5. The Town and Apple Valley Fire Protection District shall coordinate with the Apple Valley Ranchos Water Company, Golden States Water Company, and all other water purveyors serving the General Plan and annexation areas, to ensure adequate water supplies and pressure for existing and proposed development.

Water Services

1. All future development projects shall be subject to review by the Town and the applicable water purveyor to assess their potential impact on local groundwater supplies.

2. The Town and applicable water purveyor shall coordinate for the extension of infrastructure to serve future development in Annexations 2008-001 and 2008-002.

3. The use of drought tolerant landscaping shall be encouraged in public and private development.

4. Future development shall be required to conform to standards set forth in Section 17921.3 of the Health and Safety Code, Title 20, California Administrative Code Section 1601(b), and applicable sections of Title 24 of the State Code. These measures include the installation of low-flush toilets, low-flow showerheads and faucets in all new construction.

Wastewater

1. To the greatest extent feasible, all new development shall connect to the existing wastewater treatment collection system, or otherwise comply with the Town's Sewer Connection Policy.

2. The Town shall cooperate and coordinate with VVWRA to ensure that there are adequate wastewater collection and treatment facilities to serve development in the General Plan study area.

3. The Town shall continue to confer and coordinate with VVRWA to secure funding for sub-regional wastewater treatment facilities to serve development in the Town.

4. The Town shall continue to confer and coordinate with VVWRA to secure funding for tertiary treated water facilities to serve development in the Town.

Solid Waste

1. The Town and its solid waste disposal service provider shall continue to consult and coordinate to maintain and surpass, where possible, the provisions of AB 939

by means of expanded recycling programs to divert resources from the waste stream that can be returned to productive use.

2. To the greatest extent feasible, the Town shall encourage commercial and industrial establishments to minimize the amount of packaging and potential waste associated with product manufacturing and sales.

3. Recycling provisions for single-family and multi-family residential dwelling units shall continue to be included in the Town's solid waste disposal contracts.

4. Recycling provisions for commercial and business establishments should include separate recycling bins. Items to be recycled at commercial establishments may include white paper, computer legal paper, cardboard, glass, and aluminum cans.

5. As landscaping debris comprises a significant percentage of residential solid waste, developers shall contract for professional landscaping services from companies which compost green waste. Several landscaping companies in the Apple Valley/Victorville area are currently composting for waste disposal. On-site composting and grass recycling (whereby grass clippings are left on the ground) is also encouraged wherever possible.

Comparison of 2009 GP EIR vs 2024 Industrial Lands Buildout

The 2009 EIR analyzed the public services impacts associated with buildout of the Town consistent with the General Plan. Since that time, there have been no substantial General Plan Amendments that would change the intensity of development or the mix of land uses. As such, impacts on public services as described in the 2009 EIR have not substantially changed, and no new conditions or more significant impacts that were not known, or could not have been known have occurred.

Analysis of Watson High Desert Logistics

<u>Schools</u>

The Project does not include residential uses, and therefore would not directly induce substantial population growth. Job opportunities likely arising from the Project would include employment positions that are relatively common throughout Southern

California and are unlikely to generate significant population migration (if any). Any Project-related employment demands would likely be filled by the available personnel pools within the Town and/or neighboring communities. As such, the Project would not substantially increase populations of resident school-aged children requiring public education. Additionally, the Project Applicant would pay incumbent school impact fees at issuance of building permit(s). Project impacts on schools would be less than significant.

Libraries

The Project does not include residential uses, and therefore would not directly induce substantial population growth. Job opportunities likely arising from the Project would include employment positions that are relatively common throughout Southern California and are unlikely to generate significant population migration (if any). Any Project-related employment demands would likely be filled by the available personnel pools within the Town and/or neighboring communities. As such, the Project would not substantially increase demand for library services. Project impacts on library services would be less than significant.

Police Protection Services

Police protection service demands generated by the Project are offset through the payment of Town of Apple Valley Development Impact Fees. A portion of these fees are allocated for police protection services. The Project Applicant would pay incumbent Town Development Impact Fees at issuance of building permit(s). Additionally, the Project site plan concepts and proposed building designs would be reviewed by the Apple Valley Police Department to ensure incorporation of appropriate safety and security elements. Such design features would include secure building designs, defensible spaces, and area and facility security lighting. These design features would act to reduce Project demands for police protection services. Based on the preceding, the potential for the Project to result in substantial impacts associated with the provision of police protection services is considered less than significant.

Fire Protection Services

Fire protection service demands generated by the Project are offset through Project payment of Town of Apple Valley Development Impact Fees. A portion of these fees are allocated for fire protection services. The Project Applicant would pay incumbent

Town Development Impact Fees at issuance of building permit(s). Additionally, to the satisfaction of the AVFPD, the Project would comply with Town and AVFPD fire prevention and suppression requirements, including building/site design requirements, fire flow adequacy, and provisions for emergency access, thereby reducing potential increased demands for fire protection services. Based on the preceding, the potential for the Project to result in substantial impacts associated with the provision of fire protection services is considered less than significant.

Health Care Services

The Project does not include residential uses, and therefore would not directly induce substantial population growth. Job opportunities likely arising from the Project would include employment positions that are relatively common throughout Southern California and are unlikely to generate significant population migration (if any). Any Project-related employment demands would likely be filled by the available personnel pools within the Town and/or neighboring communities. As such, the Project would not substantially increase demand for health care services.

Electricity

The Project would result in the electrical consumption of approximately 27,833,154 kwh/year (Urban Crossroads, 2025a [Attachment C, Section 5.11]). The 2009 EIR calculated electrical consumption (525,032,571 kwh/year for industrial establishments) for build out of the General Plan and annexations based on SCAQMD estimated electricity usage rates by land use type. According to the Town's 2019 Climate Action Plan (CAP) Update, the Project's estimated annual use of 27,833,154 kwh/year of electricity represents approximately 8.4 percent of the total 329,848,695 kilowatt-hours used by the Town in 2019. Per the Town's CAP, the Project will be required to comply with applicable standards in the California Building Code and Energy Code Title 24 Energy Efficiency Standards. This includes meeting or exceeding the state performance standards for water heating and space heating and cooling. The Project would be subject to stricter regulations regarding energy usage than existed when the Town's General Plan was approved, and the 2009 EIR was certified. Overall impacts are expected to be less than those identified in the 2009 EIR due to the increased energy efficiency resulting from current energy and building codes.

Accordingly, the Project would not result in any new or increased significant impacts on electricity that were not already analyzed in, and fully covered by, the previously certified EIR.

Natural Gas

The Project would result in the natural gas consumption of approximately 74,994,762 kBTU/year or 779,947.62 therms/year (Urban Crossroads, 2025a [Attachment C, Section 5.11]). The 2009 EIR estimated natural gas usage for industrial uses to be 2,811,890 therms per month or 33,742,680 therms/year. According to the Town's 2019 CAP Update, the Project's natural gas demand represents approximately five percent of the Town's total 2019 natural gas usage of 15,526,732 therms. As previously stated, compliance with the Title 24 Energy Efficiency Standard will ensure that the Project is not wasteful, inefficient, or unnecessary in its consumption of natural gas during operations. All natural gas infrastructure required to serve the Project would be installed in accordance with applicable Southwest Gas Company specifications, and to the satisfaction of the Town Engineer. The locations and configurations of gas connections would be determined in conjunction with final Project designs and engineering. Extension and construction of natural gas facilities necessary to serve the Project would not result in potential impacts greater than or different than impacts resulting from the Project generally.

The Project Applicant would coordinate with Southwest Gas Company in order to obtain services and pay all requisite connection fees. The Project would not create any new impacts beyond those identified in the 2009 EIR.

Telephone, Internet, and Television Service

All dry utilities infrastructure would be installed in accordance with applicable purveyor standards and specifications, and to the satisfaction of the Town Engineer. The locations and configurations of utility connections would be determined in conjunction with final Project designs and engineering. Extension and construction of dry utilities necessary to serve the Project would not result in potential impacts greater than or different than impacts resulting from the Project generally.

The Project represents development anticipated by the General Plan. As such, the provision of dry utilities to serve the site was assumed within the 2009 EIR. The Project

Applicant would coordinate with the respective providers in order to obtain services and pay all requisite connection fees. The Project would not create any new impacts beyond those identified in the 2009 EIR.

Water Services

The Project would connect to existing adjacent Liberty Utilities domestic water infrastructure. All Project water system improvements would be designed and constructed consistent with Liberty and Town requirements. Extension and construction of water lines necessary to serve the Project would not result in potential impacts greater than or different than impacts resulting from the Project generally.

Water Supply Assessments (WSAs) for both the East and West Project sites were prepared for the Project (*Appendix H1* and *H2*, respectively). Using a water demand factor of 1,437 gallons per day (gpd) per acre, the Project's projected water demand is approximately 287,400 gpd [200 ac x 1,437 gpd/ac = 287,400 gpd]. The Project's WSAs concluded that the total projected water supplies available to Liberty Utilities during normal, single-dry, and multiple-dry water years over the next 20 years would be sufficient to meet the Project's projected water demand. Additionally, the Project would pay applicable impact fees, water connection fees, and service fees, which act to fund water improvement plans, operations, and maintenance generally. The Project would not create any new impacts beyond those identified in the 2009 EIR.

Wastewater Collection and Treatment

VVWRA would provide wastewater services for the Project sites. All Project sewer system improvements would be designed and constructed consistent with VVWRA and Town requirements. Extension and construction of sewer lines necessary to serve the Project would not result in potential impacts greater than or different than impacts resulting from the Project generally.

According to the Sanitary Sewer Feasibility studies prepared for the Project (*Appendix I1* and *I2*), the Town of Apple Valley recommended using a sewer flow discharge rate of 0.0225 gallons per day per sf which is based on the existing actual sewer flow discharge from the Walmart facility in the Town. The Project would generate approximately 83,904.75 gallons of wastewater per day or 0.084 million gallons per day (mgd) [3,729,100 sf x 0.0225 gpd/sf = 83,904.75]. VVWRA has constructed a 1-million gallon (MG) subregional membrane bioreactor (MBR) treatment plant in the vicinity of

Dale Evans Parkway and Otoe Road to handle the waste discharge from the NAVISP. The Project would discharge to the 1-MG subregional MBR plant located in the vicinity of Dale Evans Parkway and Otoe Road via the Town's 10-inch, 12-inch, and 15-inch collection system and the existing 18-inch interceptor in Otoe Road. The Town's existing system has adequate available capacity to service the Project with the exception of the existing 10-inch sewer in Dale Evans Parkway. This 3,000 linear foot segment of 10-inch sewer is at capacity, and the Town of Apple Valley as part of their Capital Improvement Project is planning to construct a parallel sewer in the bottleneck segment of the Dale Evans Parkway sewer to alleviate the problem. Additionally, the Project would pay applicable impact fees, sewer connection fees, and service fees, which act to fund sewer improvement plans, operations, and maintenance generally. Therefore, the Project would not create any new impacts beyond those identified in the 2009 EIR.

Solid Waste Management

Solid waste generated by the Project would be collected by Burrtec Waste Industries and disposed of at the Victorville Sanitary Landfill, operated by the County of San Bernardino Public Works Department. The Project would be required to comply with State and local solid waste reduction, diversion, and recycling policies and regulations. The Project proposes conventional industrial uses and would not generate volumes or types of waste not already considered and addressed under existing policies, regulations, and infrastructure systems. Based on a daily solid waste generation rate of 1.42 pounds per 100 sf per day[10], the Project would generate approximately 52,953.22 pounds per day of solid waste or approximately 26.48 tons [3,729,100 sf x 1.42 lbs/sf/day x 1 ton/2000lbs = 26.48 tons per day]. Assembly Bill 939 requires a 50% diversion of solid waste from landfills. Accounting for this diversion, the Project is estimated to generate approximately 26,476.61 pounds or 13.24 tons per day requiring landfill disposal. Victorville Sanitary Landfill, which serves the Project area, has a remaining capacity of about 79,400,000 cubic yards as of 2020[11]. The Project would contribute approximately 0.12[12] percent annually to the remaining capacity. Based upon estimates of the Project operational waste stream, it would not exceed the landfill capacity or constitute a significant demand for remaining landfill capacity. Recyclable materials generated by

[10] Estimated Solid Waste Generation Rates for Warehouse/Manufacturing (May 1997), CalRecycle https://www2.calrecycle.ca.gov/wastecharacterization/general/rates (accessed September 2024).
[11] CalRecycle Victorville Sanitary Landfill (accessed September 2024) https://www2.calrecycle.ca.gov/SolidWaste/SiteActivity/Details/1870?siteID=2652
[12] Assumes that 1 Cubic Yard of commercial and residential recyclable solid waste is equivalent to 100 lbs. (averaged). "Volume to Weight Conversion Factors," US EPA Office of Resource. Conversion and Recovery (April 2016).

the Project will be transported to Burrtec's material recovery facility in Victorville for recycling and reuse.

Moreover, the Project is consistent land uses and development anticipated by the Town General Plan and analyzed in the 2009 EIR. The Project would not result in adverse impacts to solid waste management and landfills.

Conclusion

As presented in the preceding discussion, the Project would not result in significant impacts to public services. The Project would be implemented consistent with all purveyor standards and specifications and is subject to purveyor connection fees. Additionally, the Project would pay incumbent Town Development Impact Fees at issuance of building permit(s).

Moreover, the Project represents development consistent with the General Plan, and therefore analyzed within the 2009 EIR. The Project would implement all applicable 2009 EIR mitigation measures reproduced below. As such, the Project would not create any new impacts beyond those identified in the 2009 EIR.

Police Protection

1. New development projects shall be reviewed by the Sheriff's Department to ensure the Department's ability to provide adequate police protection. New developments shall comply with established Sheriff's Department standards.

Fire Protection

2. The Town and Apple Valley Fire Protection District shall continue to enforce fire codes and other applicable standards and regulations as part of building plan review and conducting building inspections.

3. Industrial facilities that involve the storage of hazardous, flammable or explosive materials shall be sited so as to ensure the highest level of safety in strict conformance with Uniform Fire Code and other applicable codes and regulations.

4. The Apple Valley Fire Protection District shall continue to review new development proposals and evaluate project plans to assure that it can provide adequate fire protection.

Water Services

1. All future development projects shall be subject to review by the Town and the applicable water purveyor to assess their potential impact on local groundwater supplies.

3. The use of drought tolerant landscaping shall be encouraged in public and private development.

4. Future development shall be required to conform to standards set forth in Section 17921.3 of the Health and Safety Code, Title 20, California Administrative Code Section 1601(b), and applicable sections of Title 24 of the State Code. These measures include the installation of low-flush toilets, low-flow showerheads and faucets in all new construction.

Wastewater

1. To the greatest extent feasible, all new development shall connect to the existing wastewater treatment collection system, or otherwise comply with the Town's Sewer Connection Policy.

Solid Waste

2. To the greatest extent feasible, the Town shall encourage commercial and industrial establishments to minimize the amount of packaging and potential waste associated with product manufacturing and sales.

4. Recycling provisions for commercial and business establishments should include separate recycling bins. Items to be recycled at commercial establishments may include white paper, computer legal paper, cardboard, glass, and aluminum cans.

5. As landscaping debris comprises a significant percentage of residential solid waste, developers shall contract for professional landscaping services from companies which compost green waste. Several landscaping companies in the Apple Valley/Victorville area are currently composting for waste disposal. On-site composting and grass recycling (whereby grass clippings are left on the ground) is also encouraged wherever possible.

M. Recreational Resources

Summary of Findings in the 2009 EIR

In 2009, the Town had 438.87 acres of developed or developable parklands that provided a range of recreational amenities. Buildout of the 2009 General Plan and annexation areas would introduce approximately 38,824 dwelling units and 194,931 new residents who will have a need for recreational opportunities. The 2009 EIR found that implementation of the 2009 General Plan and annexation areas would require approximately 975 acres of total parkland to serve the increased population. The Town would need to provide an additional 536.13 acres within the planning area prior to buildout. The 2009 EIR concluded that implementation of the Quimby Act would require the necessary fees and dedication of land to mitigate the potential impacts to recreational resources generated by new development. Impacts were found to be less than significant with mitigation.

2009 EIR Mitigation Measures

1. The Town will require developers to participate in the Town's parkland fee programs/Quimby requirements.

2. The Town will actively pursue a range of supplementary funding sources to acquire additional parklands.

Comparison of 2009 GP EIR vs 2024 Industrial Lands Buildout

The 2009 EIR analyzed the recreational impacts associated with buildout of the Town consistent with the General Plan. Since that time, there have been no substantial General Plan Amendments that would change the intensity of development or the mix of land uses. As such, impacts on recreational resources as described in the 2009 EIR have not

substantially changed, and no new conditions or more significant impacts that were not known, or could not have been known have occurred.

Analysis of Watson High Desert Logistics

The Project does not propose residential development and would not directly contribute to resident populations that would increase the use of existing recreational facilities. Job opportunities likely arising from the Project would include employment positions that are relatively common throughout Southern California and are unlikely to generate significant population migration (if any). The proposed industrial development will not include any on-site recreational facilities, nor will it directly require the construction or expansion of additional recreational facilities. The Project would pay Development Impact Fees, as required by Mitigation Measure 1, to offset any potential incremental demands on recreational facilities. The potential for the Project to increase the use of existing neighborhood and regional parks or other recreational facilities beyond that considered and analyzed within the 2009 EIR would be less than significant.

N. Transportation

The focus of transportation analysis under CEQA has shifted since the preparation of the 2009 EIR. As this Addendum compares the proposed Project's impacts to those analyzed for build out of the General Plan, the following discussions address those issues considered in 2009.

Summary of Findings in the 2009 EIR

The Town of Apple Valley is comprised of 500 miles of paved roadways on a one-mile grid framework, and approximately 80% of the roads are local streets that serve existing residential neighborhoods. The 2009 EIR described the major regional and local roadways in the planning area traffic circulation system.

The Town is bordered on its west by Interstate 15 (I-15) and State Route 18 (SR 18). I-15 connects the Town to the Inland Empire to the south, and Las Vegas to the north, and is a 6-lane facility along the Town's boundary. Two freeway interchanges, at Stoddard Wells Road and Dale Evans Parkway occur within Town limits, both of which occur in the northern portion of the Town, providing access to NAVISP and annexation

areas. SR 18 is a 4-lane facility through the center of Town, and runs generally east-west, connecting the Town to Lucerne Valley to the east, and Victorville to the west. The Town's General Plan roadway network included a hierarchy of roadways ranging from Major Divided Parkways (142 foot right of way) to Secondary roads (88 foot right of way). The General Plan expanded the range of roadway types and added Collectors (60-66 foot right of way) and Industrial and Commercial Local Streets (66 foot right of way) to the circulation plan. The General Plan also designated a route for the High Desert Corridor, a proposed regional roadway that would extend in an east-west direction through Town, generally north of Falchion and Waalew Roads.

In the northern portion of the Town, in the area of the NAVISP and annexation areas, General Plan roadways include Dale Evans Parkway, Navajo Road and Central Road on a north-south axis; Saugus Road, Johnson Road and Quarry Road on an east-west axis; and Stoddard Wells Road which occurs diagonally through the northern part of Town and the annexation areas.

The Town used Level of Service (LOS) to analyze traffic impacts, which provides a qualitative means to measure the efficiency of traffic flow, and/or quantitatively by the number of seconds of delay for a vehicle passing through an intersection. LOS A represents the best, free flow conditions, and LOS F indicates the worst conditions and system failure.

The 2009 EIR analyzed a total of 46 intersections; all but eight intersections were operating at acceptable levels.

Traffic Impacts

The 2009 EIR evaluated the anticipated LOS at General Plan build out, and considered the changes proposed to the Town's circulation plan. Of the 46 intersections studied, the only intersection that would not meet the Town's standard was Dale Evans Parkway/Corwin Road, which would operate at LOS E during the morning peak hour at General Plan buildout.

Mitigation measures were provided within the 2009 EIR to reduce impacts and improve traffic flow. In summary, they included the imposition of roadway standards for each roadway classification; the balancing of land uses to provide employment and housing and reduce vehicle trips; the preparation of project-specific traffic impact analyses for

future projects to assure compliance with Town requirements and LOS; the inclusion of alternative transportation in new development projects, including sidewalks, bus facilities, trails and bicycle routes; and multiple mitigation measures requiring coordination between the Town and other agencies to assure coordinated development and roadway improvements.

The 2009 EIR concluded that traffic impacts associated with buildout of the General Plan would be significant and unavoidable because of the LOS E anticipated at Dale Evans Parkway/Corwin Road.

Air Traffic Impacts

The Apple Valley Airport is a general aviation airport located in the northern portion of Town, within the NAVISP. It serves fixed wing aircraft and helicopters. Airport operations were generally limited to small, private aircraft and flight schools. In addition, the California Highway Patrol and the San Bernardino County Sheriff's Department share a hangar at the airport. The 2009 EIR found no significant impacts associated with air operations at the airport, given its limited size and location in an industrially designated area.

Traffic Hazards/Emergency Access

The 2009 EIR determined that emergency access throughout Town and the annexation areas would not be impacted by buildout of the General Plan because the street system, and access and roadway design requirements had been considered in the General Plan's land use, policies and programs. In addition, the 2009 EIR disclosed that all future projects would continue to be reviewed for conformance with these standards, thereby assuring continued compliance.

Alternative Transportation

At the time the 2009 EIR was prepared, there were a total of 16 regional bus routes operated by the Victor Valley Transit Authority (VVTA). The 2009 EIR included potential extensions for bus services to allow for planning of expansion routes as buildout occurred. Mitigation was included to ensure collaboration between the Town and VVTA for expansion of bus routes and services, as well as the incorporation of bus stops into development projects, and the retrofitting of existing bus stops.

Non-motorized access to schools, commercial services, workplaces and recreational facilities were included in the policy framework of the General Plan. The General Plan proposed an expanded bike path system along General Plan roadways, and the coordination of bike paths and transit connections. The 2009 EIR included an analysis of the Town's comprehensive bike path system. The 2009 EIR also found that the General Plan's upgrading of some bike routes on higher volume roadways would reduce safety concerns and conflicts.

Similar to its system of bike routes, the General Plan also included a comprehensive system of multi-purpose trails. The Town's multi-use trails serve pedestrians, bicyclists and equestrians, and prohibits motorized vehicles except emergency response vehicles.

Mitigation was included to assure that buildout of the General Plan continued to support bike routes and trails.

2009 EIR Mitigation Measures

With the incorporation of mitigation measures listed below, the overall traffic and circulation impacts resulting from buildout of the Proposed General Plan and annexations would be reduced to less than significant levels and the required levels of service will be maintained at all intersections except Dale Evans Parkway and Corwin Road, which will operate at LOS E. This intersection's impacts could not be mitigated to less than significant levels, and impacts remained significant and unavoidable.

1. The Town shall establish and maintain a master plan of roadways that sets forth detailed improvement plans and priority schedules for implementation. The plan shall ensure that roadway segments and intersections generally operate at level of Service C or better, wherever feasible, and that all intersections maintain a Level of Service D or better during both morning and evening peak hours.

2. Street rights-of-way shall be provided as follows:
    a. 142 feet for a Major Divided Parkway
    b. 128 feet for Major Divided Arterials
    c. 104 feet for Major Roadways
    d. 88 feet for Secondary Roadways
    e. 60 to 66 feet for Collector Streets
    f. 66 feet for Industrial and Commercial Local Streets

g. 60 feet for Local Streets
h. 50 feet for Rural Streets and Cul-de-Sacs

3. All Town streets shall be designed to have a minimum lane width of 12 feet.

4. To minimize the number and length of vehicle trips travelled within the planning area, the General Plan Land Use Plan shall provide for a balance and mix of employment and housing opportunities.

5. The Town shall encourage the use of mass/public transit and collaborate with the Victor Valley Transit Authority (VVTA) to ensure the ongoing operation and expansion of fixed route bus and demand responsive systems.

6. The Town shall require that new development projects on arterial roadways incorporate bus pullouts, to allow buses to leave the flow of traffic and reduce congestion.

7. The Town shall encourage the use of multi-occupant modes of transportation, and shall encourage employers to utilize telecommuting opportunities, home-based employment, and part-time or non-peak hour work schedules.

8. The Town shall develop a program to retrofit bus pullouts on built-out streets, wherever possible, and shall implement them through the Capital Improvement Program.

9. The Town shall enhance and expand its comprehensive Master Plan of continuous, convenient multi-use trails and bicycle routes that connect residential, commercial, schools, parks and other community activity centers.

10. The Town shall consult and coordinate with the County of San Bernardino and the California Department of Transportation to ensure the provision of adequate all-weather crossings along critical roadways.

11. The Town shall ensure that sidewalks are provided on all roadways that are 88 feet wide or wider. In Rural Residential land use areas, the Town shall ensure that designated pathways are provided.

12. The Town shall confer and coordinate with the Apple Valley Unified School District to develop and implement safe routes to school.

13. The Town shall proactively consult and coordinate with the County of San Bernardino to ensure that the local airport continues to meet the Town's existing and future transportation, commercial and emergency response needs.

14. The Town shall require, as necessary, project-specific and/or phase-specific traffic impact analyses for subdivision and other project approvals. Such analyses may be required to identify build out and opening year traffic impacts and service levels, and may need to exact mitigation measures required on a cumulative and individual project or phase basis.

15. Concurrent with construction, all new development proposals located adjacent to public roadways shall be required to install all improvements to their ultimate General Plan half-width.

16. The Town shall continue to monitor roadway segments where the daily Volume to Capacity ratio analysis indicates that build out traffic volume will "potentially exceed capacity."

17. The Town shall review traffic volumes resulting from General Plan build out to coordinate, program and if necessary, revise road improvements. This review shall take place every five years.

18. All new development shall be required to pay a "fair share" of improvements to surrounding roadways, bridges and signals that are impacted by and are located within and surrounding the development project.

19. The Town shall ensure that pedestrian access is preserved and enhanced by means of the following: improved sidewalks, pedestrian walkways, lighting and landscaping designs and connections to existing sidewalks and trails.

20. New development proposals shall be required to construct bicycle lanes in conjunction with off-site improvements.

21. New development proposals shall be required to construct recreational trails in conjunction with off-site improvements.

Comparison of 2009 GP EIR vs 2024 Industrial Lands Buildout

CEQA Guidelines § 15064.3 provides that automobile delay no longer is considered an environmental effect. Nonetheless, although no longer required by CEQA, in order to determine whether the traffic analysis contained in the 2009 General Plan EIR is consistent with current conditions; the following Cumulative Trip Generation Assessment (*Appendix J1*) was prepared:

- *North Apple Valley Industrial Areas Cumulative Trip Generation Assessment* (Urban Crossroads, Inc.) June 12, 2024.

The Cumulative Trip Generation Assessment compared the traffic anticipated by the 2009 EIR ("Baseline Condition") with a "Current Cumulative Condition." The Baseline Condition includes industrial development included in the Town of Apple Valley General Plan Circulation Element Traffic Study (November 24, 2008, referred to as the 2008 Town GP Traffic Study), which is part of the 2009 EIR. The Current Cumulative Condition includes the Baseline plus existing and planned high-cube warehouse/distribution facilities. For the Current Cumulative Condition, 11 cumulative projects (currently constructed, approved or under review by the Town) replaced the Baseline Condition assumed for the parcels on which these projects are proposed within the 2009 EIR.

Exhibit 1 and Table 1 of the Cumulative Trip Generation Assessment (*Appendix J1*) show the traffic analysis zones (TAZs) and cumulative study area. In summary, as shown on Table 27, *Trip Generation Comparison*, the trip generation associated with the Current Cumulative Condition would affect the following TAZs:

Table 27 Trip Generation Comparison

TAZ	Baseline Condition, 2009 EIR - Daily Trips	Current Cumulative Condition – Daily Trips	Difference
1235	24,788	5,779	(19,009)
1236 &1239	86,658	61,250	(25,408)
1188	4,588	5,887	1,299
1189	3,496	4,725	1,229
1238	3,557	5,234	1,677
1242	3,496	3,751	255
1243	35,566	37,139	1,573
1077 & 1078	9,148	14,471	5,323
1074	4,312	4,329	17
Totals	**244,055**	**217,213**	**(26,842)**

Source: Urban Crossroads, 2024b.

As shown above, the trip generation assumed for the Baseline Condition (2009 EIR) is greater overall than the Current Cumulative Condition trip generation. The Current Cumulative Condition trip generation is anticipated to result 26,842 fewer daily trips when compared to those assumed within the 2009 EIR. Accordingly, the Current Cumulative Condition in terms of trip generation is within the envelope anticipated and analyzed by the 2009 EIR.

Analysis of Watson High Desert Logistics

The following discussions are primarily based on information presented in the following reports:

- *Watson High Desert Logistics East & Watson High Desert Logistics West Traffic Analysis* (Urban Crossroads, Inc.) April 29, 2025.
- *Watson High Desert Logistics Trip Generation Assessment* (Urban Crossroads, Inc.) December 23, 2024.
- *Watson High Desert Logistics Vehicle Miles Traveled* (VMT) Comparison (Urban Crossroads, Inc.) February 6, 2025.

The above-listed reports are provided as *Appendices J2* through *J4* to this Addendum.

Existing Conditions

A total of 29 study area intersections were selected for evaluation. The study area is illustrated on Exhibit 1-4 of the Traffic Analysis (*Appendix J2*), and the intersections included for study are also listed in Table 1-1 of the Traffic Analysis.

Based on Town of Apple Valley criteria, Level of Service (LOS) D is the minimum acceptable condition that should be maintained during the peak commute hours. Under existing conditions, all study area intersections were found to currently operate at an acceptable LOS during the peak hours. One unsignalized study area intersection currently warrants a traffic signal (Dale Evans Parkway & Johnson Road). No study area off-ramps currently experience queuing issues during the peak hours under existing (2024) traffic conditions.

Trip Generation

In order to develop the traffic characteristics of the proposed Project, trip-generation statistics published in the Institute of Transportation Engineers (ITE) Trip Generation Manual (11th Edition, 2021) were utilized to represent the following land uses proposed by the Project. Using ITE Land Use Code 155 (High-Cube Fulfillment Center Warehouse), the Project is anticipated to generate a total of 6,754 two-way vehicle trip-ends per day with 560 AM peak hour trips and 597 PM peak hour trips (actual vehicles). The Project is anticipated to generate a total of 8,166 Passenger Car Equivalent (PCE)[13] trip-ends per day with 682 AM PCE peak vehicle hour trips and 657 PM PCE peak hour vehicle trips.

Level of Service Analysis

The Traffic Analysis (*Appendix J2*) includes an analysis of the following traffic conditions:

- Existing (2024) Conditions
- Opening Year Cumulative (2027) Without Project
    - Ambient growth traffic (6.12%)
    - Cumulative Development traffic

[13] Passenger car equivalent (PCE) is a unit used to measure the impact of a vehicle on traffic flow compared to a single passenger car. PCEs are used to assess the impact of trucks, buses, and recreational vehicles on traffic flow.

- Opening Year Cumulative (2027) With Project
    - Ambient growth traffic (6.12%)
    - Cumulative Development traffic
    - Project Traffic

Table 28, *Summary of LOS* illustrates the projected opening year LOS, with and without the Project.

Table 28 Summary of LOS

Intersections		Existing 2024		2027 Without Project		2027 With Project	
		AM	PM	AM	PM	AM	PM
	Legend:		**= A-D**		**= E**		**= F**
1	Quarry Rd. & I-15 SB Ramps						
2	Quarry Rd. & Stoddard Wells Rd.						
3	I-15 NB Ramps & Stoddard Wells Rd.						
4	Stoddard Wells Rd. & Johnson Rd.						
5	I-15 SB Ramps & Dale Evans Pkwy.						
6	I-15 NB Ramps & Dale Evans Pkwy.						
7	Dale Evans Pkwy. & Stoddard Wells Rd.						
8	Dale Evans Pkwy. & Quarry Rd.						
9	Dale Evans Pkwy. & Johnson Rd.						
10	Dale Evans Pkwy. & Corwin Rd.						
11	Dachshund Av. & West Driveway 1	N/A	N/A	N/A	N/A		
12	Dachshund Av. & West Driveway 2	N/A	N/A	N/A	N/A		
13	Dachshund Av. & Los Padres Rd.	N/A	N/A	N/A	N/A		
14	Navajo Rd. & Johnson Rd.						
15	Navajo Rd. & East Driveway 1	N/A	N/A	N/A	N/A		
16	Navajo Rd. & West Driveway 3	N/A	N/A	N/A	N/A		
17	Navajo Rd. & West Driveway 4	N/A	N/A	N/A	N/A		
18	Navajo Rd. & West Driveway 5	N/A	N/A	N/A	N/A		
19	Navajo Rd. & Los Padres Rd.	N/A	N/A	N/A	N/A		
20	East Driveway 2 & Johnson Rd.	N/A	N/A	N/A	N/A		
21	East Driveway 3 & Johnson Rd.	N/A	N/A	N/A	N/A		
22	East Driveway 4 & Johnson Rd.	N/A	N/A	N/A	N/A		
23	East Driveway 5 & Johnson Rd.	N/A	N/A	N/A	N/A		
24	Central Rd. & Johnson Rd.						
25	Central Rd. & East Driveway 6	N/A	N/A	N/A	N/A		
26	Central Rd. & East Driveway 7	N/A	N/A	N/A	N/A		
27	Central Rd. & East Driveway 8	N/A	N/A	N/A	N/A		

Intersections		Existing 2024		2027 Without Project		2027 With Project	
		AM	PM	AM	PM	AM	PM
	Legend:		**= A-D**		**= E**		**= F**
28	Central Rd. & East Driveway 9	N/A	N/A	N/A	N/A		
29	Central Rd. & Waalew Rd.						

Source: Urban Crossroads, 2024b.

As shown above, 11 intersections are projected to operate at an unacceptable LOS under opening year conditions without the Project. No additional intersections would operate deficiently with the addition of Project traffic.

Table 1-3 and Section 5.7 of the Traffic Analysis (*Appendix J2*) identifies improvements and strategies for the intersections affected by the addition of Project traffic. In cases where the Project would contribute additional traffic volumes to traffic deficiencies, the Project would be required to contribute fair share costs of improvements necessary to address deficiencies.

Traffic Signal Warrants

Traffic signal warrants have been performed for opening year cumulative (2027) traffic conditions. Six study area intersections are anticipated to meet a traffic signal warrant under opening year cumulative (without Project) conditions:

- I-15 Northbound Ramps & Stoddard Wells Road
- Stoddard Wells Road & Johnson Road
- Dale Evans Parkway & Quarry Road
- Navajo Road & Johnson Road
- Central Road & Johnson Road
- Central Road & Waalew Road

With the addition of Project traffic, the following additional study area intersections are anticipated to meet a traffic signal warrant under opening year cumulative conditions:

- I-15 Southbound Ramps & Dale Evans Parkway
- I-15 Northbound Ramps & Dale Evans Parkway
- Central Road & East Driveway 7

Table 1-3 and Section 5.7 of the Traffic Analysis (*Appendix J2*) identifies improvements strategies for the intersections affected by the addition of Project traffic. The Project would pay its fair share towards the identified improvements.

Potential Cold Storage Use

Since the Project proposes speculative industrial warehouse buildings, Project-generated traffic was also evaluated assuming a potential for cold storage usage. Using ITE Land Use Code 157 (High-Cube Cold Storage Warehouse), and assuming up to 15% of the total proposed square footage could be utilized for cold storage (559,365 sf. ft.), Table 29, *Cold Storage Trip Generation Comparison* provides a comparison of Project traffic with and without cold storage use.

Table 29 Cold Storage Trip Generation Comparison

	AM Peak Hour			PM Peak Hour			Daily
	In	Out	Total	In	Out	Total	
Actual Vehicles							
Without Cold Storage	455	104	560	231	365	597	6,754
With Cold Storage	435	102	537	216	359	574	6,924
Net Change	-20	-2	-23	-15	-6	-23	170
Passenger Car Equivalent (PCE)							
Without Cold Storage	513	168	682	259	397	657	8,166
With Cold Storage	493	172	665	253	397	649	8,700
Net Change	-20	4	-17	-6	0	-8	534

Source: Urban Crossroads, 2024c.

As shown above, the potential addition of cold storage usage to the Project would be expected to generate a total increase of 170 two-way vehicle trip-ends per day with a reduction of 23 AM peak hour trips and a reduction of 23 PM peak hour trips (actual vehicles). The addition of cold storage would be anticipated to generate a total increase of 534 Passenger Car Equivalent (PCE) trip-ends per day with reduction of 17 AM PCE peak vehicle hour trips and a reduction of 8 PM PCE peak hour vehicle trips.

The development of the Project with 15% High-Cube Cold Storage Warehouse use would result in a net reduction to peak hour trips. As such, additional peak hour traffic operations analysis is not necessary based on the County Guidelines. Please also refer to *Technical Appendix J3*.

On-Site Circulation and Queuing Analysis

As described in Section II, Project Description, the Traffic Analysis (*Appendix J2*) identifies a number of on-site roadway improvements needed to accommodate site access and maintain acceptable peak hour LOS at site access and on-site intersections. The results of the queuing analysis worksheets for the weekday AM and PM peak hours are provided in Appendix 1.2 of the Traffic Analysis (*Appendix J2*) and have been used to verify the recommended pocket lengths for each of the future intersections anticipated to be completed as part of the Project. The on-site circulation improvements provide the necessary turn pocket lengths and would not result in queuing issues.

Off-Ramp Queuing Analysis

Under opening year cumulative conditions without the Project, the I-15 northbound ramps & Stoddard Wells Road (southbound shared left-through-right) is anticipated to experience queueing issues during the weekday AM and PM peak hours.

With the addition of Project traffic, the I-15 southbound ramps & Dale Evans Parkway (southbound shared left-through-right) would also experience an off-ramp queuing issue in the AM peak hour.

Section 1.6.1 and 5.7 of the Traffic Analysis (*Appendix J2*) identifies improvements strategies for the off-ramps affected by the addition of Project traffic. The Project would pay its fair share towards the identified improvements.

Bicycle and Pedestrian Facilities

Most road rights-of-way are currently unimproved in the Project vicinity and, as such, sidewalk access is not currently provided to the Project sites or adjacent properties. The Project would construct sidewalks as part of the required improvement of rights-of-way serving the Project sites. Pedestrian access within the Project sites would be required to conform to standards and specifications identified in the Town Municipal Code and the NAVISP.

Transit Service

The study area is currently served by VVTA, a public transit agency serving various jurisdictions within San Bernardino County. Route 42 currently runs along Dale Evans

Parkway, Johnson Road, and Corwin Road. Bus service routes and schedules are reviewed and updated by VVTA periodically to address ridership, budget and community demand needs. Changes in land use can affect these periodic adjustments which may lead to either enhanced or reduced service where appropriate.

Truck Routes

The Town has designated truck routes on Central Road, Waalew Road, Dale Evans Parkway and Johnson Road between Dale Evans Parkway and Central Road. Stoddard Wells Road and Johnson Road west of Dale Evans Parkway are local truck routes. Trucks accessing the Project sites would be required to travel along designated truck routes. Mandatory use of designated truck routes would minimize potential conflicts between truck traffic and other motorized and non-motorized transportation modes.

Vehicle Miles Traveled (VMT)

Since the adoption of the 2009 EIR, the CEQA Guidelines have been modified to require a VMT analysis. Although analysis of the Project's VMT impacts is not required under CEQA, because at the time the 2009 EIR was certified, CEQA did not require analysis of VMT impacts, to provide for full disclosure of the Project's impacts, a VMT Comparison has been prepared. As such, similar to other topical areas within this Addendum, the VMT Comparison (presented as Addendum *Appendix J4*) compared the VMT that would have been anticipated by the 2009 EIR ("Baseline Condition") with a "Current Cumulative Condition." The Current Cumulative Condition includes all currently developed projects, vacant land, and planned industrial projects in 2024 (inclusive of the Project) within the Town of Apple Valley. Table 30, *VMT Comparison* presents this comparison.

Table 30 VMT Comparison

	VMT/Weekday	VMT/Saturday	VMT/Sunday	VMT/Year
Baseline Condition	3,915,862	1,029,484	494,503	1,100,386,327
Current Cumulative Condition	3,485,183	976,881	469,235	984,041,510
Net Reduction	-430,680	-52,603	-25,268	-116,344,817

Source: Urban Crossroads, 2025c.

As shown above, the Current Cumulative Condition, inclusive of the Project, is anticipated to generate a net reduction in weekday, weekend, and annual VMT compared to what would have been anticipated under the 2009 General Plan EIR.

Conclusion

Project traffic would contribute to LOS deficiencies, traffic signal warrants, and off-ramp queuing delays identified under 2027 conditions. The Project would pay its fair share toward the improvements identified within the TA to maintain General Plan consistency.

Additionally, according to the Cumulative Trip Generation Assessment (*Appendix J1*), the 2009 EIR assumed a mix of land uses that exceed the Cumulative Condition by 26,842 daily trips. The Project is anticipated to generate a total of 6,754 trips per day (actual vehicles) without cold storage (*Appendix J2*), or 6,924 trips per day (actual vehicles) with cold storage (*Appendix J3*). Moreover, VMT associated with current conditions inclusive of the Project, would be less than what would have been anticipated under 2009 EIR conditions (*Appendix J4*). As such, traffic associated with development of the Project is within the envelope of that assumed for industrial uses within the NAVISP area. Moreover, the Project would be subject to following applicable mitigation presented in the 2009 EIR.

2. Street rights-of-way shall be provided as follows:
   a. 142 feet for a Major Divided Parkway
   b. 128 feet for Major Divided Arterials
   c. 104 feet for Major Roadways
   d. 88 feet for Secondary Roadways
   e. 60 to 66 feet for Collector Streets
   f. 66 feet for Industrial and Commercial Local Streets
   g. 60 feet for Local Streets
   h. 50 feet for Rural Streets and Cul-de-Sacs

3. All Town streets shall be designed to have a minimum lane width of 12 feet.

4. To minimize the number and length of vehicle trips travelled within the planning area, the General Plan Land Use Plan shall provide for a balance and mix of employment and housing opportunities.

6. The Town shall require that new development projects on arterial roadways incorporate bus pullouts, to allow buses to leave the flow of traffic and reduce congestion.

7. The Town shall encourage the use of multi-occupant modes of transportation, and shall encourage employers to utilize telecommuting opportunities, home-based employment, and part-time or non-peak hour work schedules.

11. The Town shall ensure that sidewalks are provided on all roadways that are 88 feet wide or wider. In Rural Residential land use areas, the Town shall ensure that designated pathways are provided.

14. The Town shall require, as necessary, project-specific and/or phase-specific traffic impact analyses for subdivision and other project approvals. Such analyses may be required to identify build out and opening year traffic impacts and service levels and may need to exact mitigation measures required on a cumulative and individual project or phase basis.

15. Concurrent with construction, all new development proposals located adjacent to public roadways shall be required to install all improvements to their ultimate General Plan half-width.

18. All new development shall be required to pay a "fair share" of improvements to surrounding roadways, bridges and signals that are impacted by and are located within and surrounding the development project.

20. New development proposals shall be required to construct bicycle lanes in conjunction with off-site improvements.

Based on the preceding, the Project represents development anticipated and analyzed within the 2009 EIR. Accordingly, the Project would not result in any new or increased traffic impacts that were not already considered and analyzed in the previously certified EIR.

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