

Responses to Comments

This appendix to the Final Initial Study/Mitigated Negative Declaration (IS/MND) for the Waalew Road Truck and Trailer Facility Project (project) includes a copy of all comment letters that were submitted regarding the Draft MND, along with responses to comments in accordance with California Environmental Quality Act (CEQA) Guidelines Section 15088. The 30-day review period for the Draft MND began on September 5, 2025 and ended on October 16, 2025.

A total of 19 letters and/or emails were received by the Town of Apple Valley. All written comment letters or emails received are listed in Table 1 and all are included in Attachment A. Each letter or email has been assigned a numeric label to facilitate identification and tracking, and the individual comments within are bracketed and numbered. Individual comments and the responses to them were assigned corresponding numbers (e.g., 1-1, 1-2). Summaries of the comments received in 19 letters and emails and the Responses to Comments are itemized herein corresponding to the itemization noted within the letters and emails received.

TABLE 1: LIST OF PUBLIC COMMENT LETTERS AND EMAILS

Comment Letter/ Email Number	Commenter	Date
1	California Department of Fish and Wildlife	September 22, 2025
2	David H. Ford	Not specified
3	Matthew Malady	October 8, 2025
4	Matthew Malady	October 8, 2025
5	Andrew Turrentine	October 13, 2025
6	Adam	October 13, 2025
7	Marissa Galford	October 13, 2025
8	Marissa Galford	October 8, 2025
9	Carlos Aguilera	October 14, 2025
10	Paulette Pereira	October 14, 2025
11	Elaine Lauro	October 15, 2025
12	Joey Lauro	October 16, 2025
13	Michael Chandler	October 16, 2025
14	Cristian Ramirez	October 18, 2025
15	Janae Escobar	October 18, 2025
16	Elaine Lauro	October 27, 2025
17	Michael Aasand	October 29, 2025
18	Bonnie Fraterrigo	November 14, 2025
19	Elaine Lauro – Petition	November 19, 2025

Comment Letter 1 - California Department of Fish & Wildlife Letter Dated September 22, 2025

Comment 1-1

Introductory comment.

Response to Comment 1-1

No response is required.

Comment 1-2

The comment explains CDFW's responsibility as a Trustee Agency under CEQA.

Response to Comment 1-2

Comment noted; no response is required.

Comment 1-3

The comment explains CDFW's responsibility as a Responsible Agency under CEQA.

Response to Comment 1-3

Comment noted; no response is required.

Comment 1-4

This comment provides a summary of the project description.

Response to Comment 1-4

Comment noted; no response is required.

Comment 1-5

The comment provides an introduction of comments that follow.

Response to Comment 1-5

Comment noted; no response is required.

Comment 1-6

The comment suggests that Mitigation Measure BIO-2 lacks proper methodology, timing, and monitoring for nesting birds and suggest revisions to the mitigation.

Response to Comment 1-6

The Town acknowledges the comment and has revised the Mitigation Measure language in the MMRP and on pages 31-32 of the Final IS/MND to incorporate CDFW's suggestion.

The new MM BIO-2 reads:

To avoid impacts to nesting birds (common, migratory, and special status) regardless of the time of year during the nesting season, a qualified Avian Biologist retained by the Project applicant will conduct pre-construction Nesting Bird Surveys (NBS) within 3 days prior to Project-related disturbance within the entire Project site and a 300-foot buffer

around the Project site at the appropriate time of day/night, during appropriate weather conditions to identify any active nests. Surveys shall encompass all suitable areas including, trees, shrubs, bare ground, burrows and cavities. If no active nests are found, no further action will be required. If a nest is suspected, but not confirmed, the qualified avian biologist shall establish a disturbance-free buffer until additional surveys can be completed prior to the commencement of ground disturbing Project activities. If an active nest is found, the qualified avian biologist will set appropriate no-work buffers around the nest which will be based upon the nesting species, its sensitivity to disturbance, nesting stage, and expected types, intensity, and duration of the disturbance. If a nest is observed, but thought to be inactive, the qualified avian biologist shall monitor the nest for one hour (four hours for raptors) prior to approaching the nest to determine status. The qualified avian biologist shall not risk failure of the nest to determine the exact location or status and shall make every effort to limit the nest to potential predation as a result of the survey/monitoring efforts (e.g., limit number of surveyors, limit time spent at/near the nest, scan the site for potential nest predators before approaching, immediately depart nest area if indicators of stress or agitation are displayed). The buffer shall be of a distance to ensure avoidance of adverse effects to the nesting bird. The qualified avian biologist shall use their best professional judgement regarding the monitoring period and whether approaching the nest is appropriate. The nests and buffer zones shall be field-checked daily by a qualified biological monitor. The approved no-work buffer zone shall be clearly marked in the field, within which no disturbance activity shall commence until the qualified biologist has determined the young birds have successfully fledged and the nest is inactive.

Comment 1-7

CDFW states the Project has the potential to result in permanent and temporary loss, degradation, and impacts to desert tortoise habitat. The Project may result in take of desert tortoise, a CESA listed endangered species, during construction of the Project and the life of the Project. California Fish and Game Code Section 86 defines "take" as "hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill".

Response to Comment 1-7

The Town disagrees with this comment as the site does not have suitable habitat for this species based on the presence of saline soils and surrounding development. As noted in Section 3.2.3 of the Biological Assessment for this Project:

The habitat on site is not suitable for desert tortoise. The dominant soil type on-site is of a saline-alkaline nature. Additionally, no sign of desert tortoise (i.e. burrows, tracks, or pellets) was observed during the survey and no desert tortoise individuals were observed. The site also contained evidence of ongoing disturbance in the form of off-road vehicle use and pedestrian/domestic dog use.

The majority of soils on site are saline in nature and not conducive to tortoise occupation (Rosamond Loam, Saline-Alkali covers majority of Project Site). Additionally, no evidence of current or past tortoise occupation was observed. Transient tortoises are also unlikely given the surrounding area is developed with residential and public uses, and includes major infrastructure that provides barriers to tortoise movement. The habitat is not suitable within the immediate surroundings, and the large number of predators within the immediate surroundings (ravens, dogs, humans, etc.) would preclude this species from

utilizing the site for any purpose. Therefore, no additional surveys are warranted or recommended.

If tortoises were found to inhabit the site in the future, a Section 10(a) incidental take permit from the USFWS and a Section 2081 permit from CDFW will be required to mitigate impacts to the species.

Comment 1-8

CDFW requests that environmental data collected for the project's report be incorporated into the CNDDDB.

Response to Comment 1-8

Comment noted; the Town will forward this request to the Project biologist.

Comment 1-9

CDFW notes fees required upon filing of the Notice of Determination.

Response to Comment 1-9

Comment noted; no response is required.

Comment 1-10

The comment expresses CDFW's appreciation opportunity to comment.

Response to Comment 1-10

Comment noted; no response is required.

Comment Letter 2 – Email from David Ford (no date)

Comment 2-1

This comment is an introduction to the email referencing it as a report that identifies significant areas of potential impacts.

Response to Comment 2-1

Comment is introductory; no further response is required.

Comment 2-2

The comment claims that the Project's Health Risk Assessment underestimated 24-hour truck idling and diesel exhaust impacts by failing to model continuous exposure or cumulative cancer risk for nearby residents.

Response to Comment 2-2

The Town disagrees with the comment. As stated on page 4 of the Draft MND, business operations would occur 10 hours a day, not 24 hours. Cancer risk is expressed as a probability of an individual out of a population of one million contracting cancer via a continuous exposure to TACs over a 30-year lifetime. The HRA provided as Appendix D to the Draft MND included an assessment of cumulative cancer-related health risk to sensitive receptors within the project vicinity based on the following most-conservative scenario:

An unborn child in its 3rd trimester is potentially exposed to DPM emissions (via exposure of the mother) during the opening year. That child is born opening year and then remains at home for the entire first two years of life. From age 2 to 16, the child remains at home 100 percent of the time. From age 16 to 30, the child continues to live at home, growing into an adult that spends 73 percent of its time at home and lives there until age 30. Based on the ultra-conservative assumptions, applied in the Health Risk Assessment, the 30.25-year, cumulative carcinogenic health risk to an individual born during the opening year of the Proposed Project and living in the project vicinity for the entire cumulative risk duration, is a maximum of 9.76 in a million. Refer to Appendix D of the Draft MND. Therefore, as the maximum incremental cancer risk (MICR) does not exceed 10 in a million at the closest sensitive receptor locations in the project vicinity, no sensitive receptors would experience a significant impact due to the cancer risk from diesel emissions created by the Proposed Project.

Comment 2-3

The comment expresses concern about water and soil contamination that may migrate into the groundwater basin from pollutants such as oil, fuel, and rubber residue. Commenter suggests hydrogeologic risk modeling.

Response to Comment 2-3

As stated on page 48 of the Draft MND, the Project Applicant will be required to comply with the Town of Apple Valley Code of Ordinances, 9.70.020 - Performance Standards for any handling, transportation, or storage of hazardous materials. The Project Operator will be required to comply with the Town's requirements for any hazardous materials handling and the Town Fire Marshal will review and approve plans. In addition, the Proposed Project would be subject to the National Pollutant Discharge Elimination System (NPDES) permit, which requires a Water Quality Management Plan (WQMP). The WQMP includes mandatory compliance of BMPs as well as compliance with NPDES Permit requirements. Refer to Section 4 of Draft MND Appendix K for

project BMPs. As stated on page 52 of the Draft MND, the WQMP identifies an infiltration basin to capture and treat all storm flows generated on the Project Site to prevent degradation of surface and groundwater quality. Review and approval of the WQMP by the Town of Apple Valley is required and would ensure that all potential pollutants of concern are minimized or otherwise appropriately treated prior to being discharged from the Project Site. As concluded in the Percolation report (Appendix I of the Draft MND), historical groundwater is reported at a depth in excess of 100 feet below grade.

Comment 2-4

This comment claims that the MND did not analyze noise and lighting impacts from nighttime activities.

Response to Comment 2-4

As stated on page 17 of the Draft MND, the design and placement of light fixtures for the Proposed Project would be consistent with the Municipal Code standards for lighting (Municipal Code 9.70.020) Town standards. The hours of operation are limited to 7:00 AM to 5:00 PM. Only security-level lights would be on between 5:00 PM and 7:00 AM.

A Noise Impact Analysis was prepared for the Proposed Project January 2, 2025 and revised August 26, 2026 and is included in the Final IS/MND as Appendix L. The Noise Impact Analysis concluded:

Exterior Noise Impacts: Project exterior operational noise levels at residential zoned property lines are expected to range between 46 and 48 dBA Leq. therefore, the project will not exceed Town-established daytime exterior adjusted stationary noise standards. Further, project operational hours will be 7:00 AM until 5:00 PM and therefore will not violate nighttime noise standards. This impact is less than significant.

Interior Noise Impacts: Typical residential construction provides approximately 20 dB of exterior to interior noise reduction with windows closed and approximately 15 dB of reduction with windows open. Project operational noise will not cause daytime interior noise levels to exceed the Town's interior noise standard of 45 dBA Leq at nearby residential land uses. Project operational hours are 7:00 AM to 5:00 PM. Therefore, nighttime interior noise standards will not be exceeded.

Operational Noise Impacts – Offsite Vehicle Trips: A Noise Impact Analysis was prepared for the Proposed Project and is included as Appendix L to the Final IS/MND. Per the Town, a project traffic induced noise increase of 3 dBA or greater may be considered to be significant. The addition of project construction vehicles per day along off-site roadway segments would not be anticipated to result in a doubling of traffic volumes necessary to increase noise levels by 3 dBA. Off-site project generated construction vehicle trips would result in a negligible noise level increase and would not result in a substantial increase in ambient noise levels. Impacts would be less than significant. No mitigation measures are required. The addition of project trips is not expected to change noise levels in excess of the applicable threshold at any of the study roadway segments.

Therefore, neither lighting nor noise impacts would exceed City thresholds.

Comment 2-5

This comment focuses on the Traffic Impact Analysis level of service, predictions particularly for Dale Evans Parkway/Waalew Road by 2040. There is also concern about truck queues extending

onto Waalew Road and creating safety hazards. The comment notes that the cumulative analysis does not include nearby developments.

Response to Comment 2-5

As stated in the Traffic Impact Analysis (TIA) included as Appendix B to the Draft MND, projects within a 1.5-mile radius of the project site are included in the cumulative analysis. Trips generated by other pending or approved but unconstructed developments in the Town were reviewed and added to future volume forecasts. See Table 3 of TIA. The planned Dale Evans Parkway at Waalew Road Realignment project includes realigning Dale Evans Parkway on the north leg to align with Dale Evans Parkway on the south leg, installing traffic signals and improving pedestrian crossing. This project is funded and has a preliminary schedule for construction with completion in 2027. Moreover, the proposed project shall contribute towards the Town of Apple Valley General Plan Circulation Element Program 1.A.4, Development Impact Fee program (Municipal Code Chapter 3.28) and regional transportation development mitigation fee program (County of San Bernardino Measure I). The Development Impact Fee provides a funding mechanism for arterial streets, traffic signals, interchange improvements as well as emergency services. The purpose of such fees is to minimize, to the greatest extent practicable, the impact that new development has on the Town's public services and public facilities. A fair share analysis was prepared to identify the share of project trips contributed to substantially impacted locations for which improvements are identified that may not be currently included in the Town's Development Impact Fee program. To the extent that any of the identified improvements are not included in the Town's Development Impact Fee program, the project would contribute towards those improvements on a fair share basis. The project fair share is based on the proportion of project peak hour trips contributed to the improvement location relative to the total new peak hour traffic volume.

In addition, vehicle stacking at the proposed gated access points was evaluated in the TIA to ensure adequate on-site vehicle storage length allows vehicles a place to wait for the gate to open without blocking the public right-of-way. Based on the inbound volume, the forecast queue length of 75 feet (approximately one truck or three cars) and the storage capacity of 135 feet, the gates have sufficient storage to accommodate the forecast queue length.

Comment 2-6

The comment states that the site supports burrowing owls and desert wildlife. It also argues that provided mitigation does not include habitat compensation and permanent loss of habitat is an unavoidable impact.

Response to Comment 2-6

As stated in pages 28-29 of the Draft MND, because the site is minimally suitable for burrowing owl, Mitigation Measure BIO-1 shall be implemented to require pre-construction surveys be conducted in accordance with the CDFW Staff Report on Burrowing Owl Mitigation to determine whether occupied burrows are on-site and further construction should be halted. Pages 28-29 of the Draft MND also state that except for burrowing owl, special status species are considered absent from the Project Site. As stated in the Draft MND Appendix B, the Project Site is not mapped within an area for wildlife movement and is not within a habitat conservation plan. Additionally, the site is not within a wildlife linkage as mapped by Mojave Desert Land Trust. Therefore, the proposed Project will have a less than significant impact on any current wildlife corridors or habitat conservation plans. According to the databases, no USFWS-designated critical habitat occurs within or adjacent to the project site. The biologist's findings regarding habitat for special status species are listed on pages 13 and 14 of Appendix B. Due to the

biologist's findings and the U.S. Fish and Wildlife Service and California Department of Fish and Game guidelines, no compensatory mitigation is required.

Comment 2-7

This comment claims that large reflective surfaces and lighting structures will generate glare visible across Apple Valley.

Response to Comment 2-7

The proposed project does not include large reflective structures. The 120 square-foot guard shack is the only proposed building. The majority of the project site would be gravel with truck trailers parked on-site. Truck trailers are not considered highly reflective. As stated on page 17 of the Draft MND, at completion of construction, two LED wall packs would be placed on the outside of the guard shack. Light poles at 20 feet in height are proposed throughout the property: 14 spaced evenly around the parking area and pointed towards the center, and eight scattered throughout the parking area. The design and placement of light fixtures for the Proposed Project would be consistent with the Municipal Code standards for lighting (Municipal Code 9.70.020) Town standards, as listed below:

1. All lighting used in parking lots for security purposes or safety-related uses shall be scheduled so that light rays emitted by the fixture are projected below the imaginary horizontal plane passing through the lowest point of the fixture and in such a manner that the light is directed away from streets and adjoining properties.
2. If lighting is used or is necessary for color rendition, the primary lighting system shall be supplemented with a secondary lighting system which shall serve as security-level lighting and shall be the sole source of lighting during the nonoperating hours of each business.
3. Lighting standards and fixtures shall be of a design compatible with the architecture of onsite buildings.
4. Flashing lights are prohibited.
5. The intensity of light at the boundary of any multi-family, commercial, or industrial zoning district shall not exceed seventy-five (75) foot lamberts from a source of reflected light.
6. Parking lot lighting and/or security lighting, when affixed to individual poles or affixed to any structure on site, shall not exceed a height of twenty (20) feet above the parking area surface.
7. Security or accent lighting for single-family residences shall be shielded to project downward or in a manner that the light is directed away from streets and adjoining properties.

Therefore, less than significant adverse impacts are identified or anticipated, and no mitigation measures are required.

Comment 2-8

The comment states that the community is already impacted by industrial emissions and the MND does not address cumulative air, dust, and socioeconomic impacts.

Response to Comment 2-8

Socioeconomic impacts are not analyzed under CEQA. As stated on page 82 of the Draft MND, in evaluating the cumulative effects of the project, Section 21100(e) of CEQA states that

“previously approved land use documents including, but not limited to, general plans, specific plans, and local coastal plans, may be used in cumulative impact analysis.” The Proposed Project does not include a General Plan Amendment nor zone change. It is therefore consistent with the General Plan impacts evaluated in the General Plan EIR, August 2009. Development of the Proposed Project will be conditioned to comply with current MDAQMD rules and regulations, which includes dust suppression, to minimize impacts to air quality.

Comment 2-9

This comment requests that an EIR be prepared.

Response to Comment 2-9

As concluded on page 12 of the Draft MND, with implementation of identified mitigation measures, the Proposed Project would not result in significant unavoidable environmental impacts. The Town asserts that the Proposed Project would not require a full EIR.

Comment 2-10

The comment recommends additional studies and actions that should be taken including:

- Prepare a full Environmental Impact Report under CEQA §15064.
- Conduct refined Health Risk Assessment with continuous exposure modeling.
- Perform Hydrogeologic and Groundwater Contamination Study.
- Conduct Photometric Lighting and Visual Impact Analysis.
- Implement 24-hour Noise and Air Quality Monitoring
- Require Off-site Biological Mitigation and Wildlife Corridor Protection.
- Complete Environmental Justice and Cumulative Burden Assessment.
- Re-circulate environmental review for additional public comment.

Response to Comment 2-10

Per CEQA Public Resources Code 15073.5, “A lead agency is required to recirculate a negative declaration when the document must be substantially revised after public notice of its availability has previously been given...A “substantial revision” of the negative declaration shall mean:

- 1) A new, avoidable significant effect is identified and mitigation measures or project revisions must be added in order to reduce the effect to insignificance, or
- 2) The lead agency determines that the proposed mitigation measures or project revisions will not reduce potential effects to less than significance and new measures or revisions must be required.

None of the criteria above apply to the project.

Per CEQA Public Resources Code 15074, “the decision-making body of the lead agency shall consider the proposed negative declaration or mitigated negative declaration together with any comments received during the public review process. The decision-making body shall adopt the proposed negative declaration or mitigated negative declaration only if it finds on the basis of the whole record before it (including the initial study and any comments received), that there is no substantial evidence that the project will have a significant effect on the environment and that the

negative declaration or mitigated negative declaration reflects the lead agency's independent judgment and analysis."

The Town has determined that the Final MND and its associated studies are adequate in addressing the project's potential impacts under CEQA and that recirculation is not required.

Comment 2-11

Commenter references a document from which above "analysis" was taken.

Response to Comment 2-11

The comment does not raise any specific environmental issues related to the adequacy of the Draft MND, and no further response is required.

Comment Letter 3 – Email from Matthew Malady Dated October 8, 2025

Comment 3-1

The Commenter states the Project is concerning to Commenter and nearby neighbors and that many of the residents did not receive notice of the public review or received it after the review period ended.

Response to Comment 3-1

The comment does not raise any specific environmental issues related to the adequacy of the Draft MND, and no further response is required. The commenter owns and lives at 16684 Navajo Road, which is the property of concern. The Town direct mailed the CEQA Notice of Intent to this address on September 25, 2025, according to a signed affidavit of mailing provided by Town Staff on that date.

Comment 3-2

This comment focuses on the project's potential impacts on scenic views, the industrial use being proposed adjacent to Commenter's property the associated risks, and the effect on property values.

Response to Comment 3-2

As stated on page 18 of the Final IS/MND, typical trucks and trailers average 13.5 feet in height and cannot park within the setbacks; therefore, trucks and trailers would not obstruct any views of the scenic vistas. However, views of the San Bernardino Mountains from the residences to the east of the Project Site could be limited due to the proposed 6-foot block wall. With implementation of a 26.37-foot linear landscape area comprised of shrubs proposed between the wall and the eastern project boundary, the impact to any scenic views would be minimized to the extent feasible by the inclusion of green space. As concluded in the Noise Impact Analysis, noise generated by the project would not exceed Town standards. Property value is not an impact required to be analyzed by CEQA Guidelines. No further analysis is warranted.

Comment 3-3

The comment presents concern about lighting (specifically at night), sounds, and the view of the proposed facility.

Response to Comment 3-3

Per Town of Apple Valley Development Code Section 9.45.040, Site Development standards for development projects require the following

- 1) Screening and buffering, such as landscaping, earth berms, decorative walls and other buffers shall be used to define project boundaries and to reduce impacts on adjacent properties
- 2) Along all other lot lines adjacent to residential districts, a maximum eight (8)-foot high decorative masonry wall or fence shall be constructed.
- 3) All buildings, structures, yards and improvements shall be maintained in a manner which does not detract from the appearance of the neighborhood. The following conditions are prohibited:
 - a. Dilapidated, deteriorating, unrepaired, or vandalized (such as graffiti) structures including fences, roofs, doors, walls and windows.

- b. Accumulation of scrap lumber, junk, trash or debris.
- c. Unattended, overgrown or dead landscape materials and damaged or unmaintained landscape features such as benches and sculptures.

See response to 3-2. As stated on page 17 of the Draft MND, even though the Project Site is part of the natural desert environment, there are no scenic resources on-site and the proposed landscaping would complement the existing environment with the incorporation of desert plants. The design and placement of light fixtures for the Proposed Project would be consistent with the Municipal Code standards for lighting (Municipal Code 9.70.020) Town standards, as follows:

1. All lighting used in parking lots for security purposes or safety-related uses shall be scheduled so that light rays emitted by the fixture are projected below the imaginary horizontal plane passing through the lowest point of the fixture and in such a manner that the light is directed away from streets and adjoining properties.
2. If lighting is used or is necessary for color rendition, the primary lighting system shall be supplemented with a secondary lighting system which shall serve as security-level lighting and shall be the sole source of lighting during the nonoperating hours of each business.
3. Lighting standards and fixtures shall be of a design compatible with the architecture of onsite buildings.
4. Flashing lights are prohibited. The intensity of light at the boundary of any multi-family, commercial, or industrial zoning district shall not exceed seventy-five (75) foot lamberts from a source of reflected light.
5. Parking lot lighting and/or security lighting, when affixed to individual poles or affixed to any structure on site, shall not exceed a height of twenty (20) feet above the parking area surface.
6. Security or accent lighting for single-family residences shall be shielded to project downward or in a manner that the light is directed away from streets and adjoining properties.

Lighting would be limited to the hours of operation (daytime). Only security lighting would be on outside of the hours of operations. Therefore, the residences to the east would not be exposed to nighttime lighting. No further analysis is warranted.

Comment 3-4

Closing comment.

Response to 3-4

Comment noted.

Comment Letter 4 - Email from Matthew Malady Dated October 8, 2025

General Comment

This is from the same sender and includes the same content as Letter 3 but is addressed to the Town of Apple Valle Planning Commission.

Response to General Comment

Refer to Responses to Comments 3-1 through 3-4.

Comment Letter 5 – Email from Andrew Turrentine Dated October 13, 2025

Comment 5-1

This is a comment expressing disagreement that the trucking facility belongs at proposed Project Site.

Response to Comment 5-1

The comment does not raise any specific environmental issues related to the adequacy of the Draft MND, and no further response is required.

Comment Letter 6 – Email from Adam Dated October 13, 2025

Comment 6-1

This comment is an introduction to reasons why the project should not be approved.

Response to Comment 6-1

Comment is introductory; no further response is required.

Comment 6-2

The indicates that roads are currently in poor condition and the project traffic would exacerbate these conditions.

Response to Comment 6-2

As stated in the Traffic Impact Analysis, the proposed project shall contribute towards the Town of Apple Valley General Plan Circulation Element Program 1.A.4, Development Impact Fee program (Municipal Code Chapter 3.28) and regional transportation development mitigation fee program (County of San Bernardino Measure I). The Development Impact Fee provides a funding mechanism for arterial streets, traffic signals, interchange improvements as well as emergency services. The purpose of such fees is to minimize, to the greatest extent practicable, the impact that new development has on the Town's public services and public facilities. A fair share analysis was prepared to identify the share of project trips contributed to substantially impacted locations for which improvements are identified that may not be currently included in the Town's Development Impact Fee program. To the extent that any of the identified improvements are not included in the Town's Development Impact Fee program, the project would contribute towards those improvements on a fair share basis. The project fair share is based on the proportion of project peak hour trips contributed to the improvement location relative to the total new peak hour traffic volume.

Comment 6-3

The comment asserts that the project operations would increase noise levels.

Response to Comment 6-3

As stated on page 62 of the Draft MND and Appendix L of the Draft MND, peak project operation would not exceed the daytime exterior adjusted stationary noise standards. Furthermore, Project operational noise will not cause daytime interior noise levels to exceed the Town's interior noise standard of 45 dBA Leq at nearby residential land uses. The Proposed Project operational hours will be 7:00 AM until 5:00 PM and therefore will not violate nighttime noise standards (35 dBA Leq at residential uses).

Comment 6-4

The comment states that the project would likely increase crime in the neighborhood due to storage of merchandise.

Response to Comment 6-4

The Proposed Project is described in the Initial Study to include a gated entry and guard shack to be manned 24 hours/day. For additional site security, eight-foot-tall block walls are proposed along and behind the front (northerly) setback(see MND Figure 5 – Site Plan). Six-foot-tall block walls are proposed along the eastern boundary. Chain link fences with tan slates are proposed along

the western and the southern boundaries. The project also includes two LED wall packs would on the outside of the guard shack and 20-foot-high light poles throughout the property: 14 spaced evenly around the parking area and pointed towards the center, and eight scattered throughout the parking area. The Site Plan is subject to review by all Town departments including the Sheriff's Department and would also be conditioned for the payment of the Town's development impact fees pursuant to Municipal Code Chapter 9.71.055. Payment of the Town's development impact fees would mitigate any potential impact on Sheriff's Department facilities.

Comment 6-5

This comment notes that there would be decrease in property value because of the reasons previously listed.

Response to Comment 6-5

Property value is not an impact analyzed under CEQA.

Comment 6-6

The comment concludes the letter opposing approval of the facility.

Response to Comment 6-6

Comment noted.

Comment Letter 7 – Email from Marissa Galford Dated October 13, 2025

Comment 7-1

This comment is an introduction to the list of reasons why the project should not be approved.

Response to Comment 7-1

Comment is introductory; no further response is required.

Comment 7-2

The comment identifies air pollution as a concern.

Response to Comment 7-2

As stated on page 25 of the Draft MND, the project would not exceed applicable MDAQMD regional thresholds either during construction or operational activities. Emissions that do not exceed the daily or annual emission significant thresholds are considered to result in less than significant localized impacts. Potential sources that may emit odors during the on-going operations of the Proposed Project would include odor emissions from vehicular emissions. Tractors would not be left to idle while they are parked, thereby temporally limiting odor emissions. Development of the Proposed Project will be conditioned to comply with current MDAQMD rules and regulations, which includes dust suppression, to minimize impacts to air quality. As concluded on page 23 of the Draft MND, the Proposed Project does not exceed applicable MDAQMD regional thresholds either during construction or operational activities. It would not violate any air quality standard or contribute substantially to an existing or projected air quality violation.

Comment 7-3

The comment identifies increase in crime as a concern.

Response to Comment 7-3

The Proposed Project is described in the Initial Study to include a gated entry and guard shack to be manned 24 hours/day. For additional site security, eight-foot-tall block walls are proposed along and behind the front (northerly) setback(see MND Figure 5 – Site Plan). Six-foot-tall block walls are proposed along the eastern boundary. Chain link fences with tan slates are proposed along the western and the southern boundaries. The project also includes two LED all packs would on the outside of the guard shack and 20-foot-high light poles throughout the property: 14 spaced evenly around the parking area and pointed towards the center, and eight scattered throughout the parking area. The Site Plan is subject to review by all Town departments including the Sheriff's Department and would also be conditioned for the payment of the Town's development impact fees pursuant to Municipal Code Chapter 9.71.055. Payment of the Town's development impact fees would mitigate any potential impact on Sheriff's Department facilities.

Comment 7-4

The comment identifies noise disturbance as a concern.

Response to Comment 7-4

A Noise Impact Analysis was prepared for the Proposed Project January 2, 2025 and revised on August 26, 2026 and is included in the Final IS/MND as Appendix L. The Noise Impact Analysis concluded:

Exterior Noise Impacts: Project exterior operational noise levels at residential zoned property lines are expected to range between 46 and 48 dBA Leq. therefore, the project will not exceed Town-established daytime exterior adjusted stationary noise standards. Further, project operational hours will be 7:00 AM until 5:00 PM and therefore will not violate nighttime noise standards. This impact is less than significant.

Interior Noise Impacts: Typical residential construction provides approximately 20 dB of exterior to interior noise reduction with windows closed and approximately 15 dB of reduction with windows open. Project operational noise will not cause daytime interior noise levels to exceed the Town's interior noise standard of 45 dBA Leq at nearby residential land uses. Project operational hours are 7:00 AM to 5:00 PM. Therefore, nighttime interior noise standards will not be exceeded.

Operational Noise Impacts – Offsite Vehicle Trips: A Noise Impact Analysis was prepared for the Proposed Project and is included as Appendix L to the Final IS/MND. Per the Town, a project traffic induced noise increase of 3 dBA or greater may be considered to be significant. The addition of project construction vehicles per day along off-site roadway segments would not be anticipated to result in a doubling of traffic volumes necessary to increase noise levels by 3 dBA. Off-site project generated construction vehicle trips would result in a negligible noise level increase and would not result in a substantial increase in ambient noise levels. Impacts would be less than significant. No mitigation measures are required. The addition of project trips is not expected to change noise levels in excess of the applicable threshold at any of the study roadway segments. The addition of project trips is not expected to change noise levels in excess of the applicable threshold at any of the study roadway segments. Therefore, noise impacts would not exceed City thresholds.

Comment 7-5

The comment identifies excessive lighting as a concern.

Response to Comment 7-5

The design and placement of light fixtures for the Proposed Project would be consistent with the Town Municipal Code standards for lighting (Municipal Code 9.70.020), as follows:

1. All lighting used in parking lots for security purposes or safety-related uses shall be scheduled so that light rays emitted by the fixture are projected below the imaginary horizontal plane passing through the lowest point of the fixture and in such a manner that the light is directed away from streets and adjoining properties.
2. If lighting is used or is necessary for color rendition, the primary lighting system shall be supplemented with a secondary lighting system which shall serve as security-level lighting and shall be the sole source of lighting during the nonoperating hours of each business.
3. Lighting standards and fixtures shall be of a design compatible with the architecture of onsite buildings.
4. Flashing lights are prohibited. The intensity of light at the boundary of any multi-family, commercial, or industrial zoning district shall not exceed seventy-five (75) foot lamberts from a source of reflected light.
5. Parking lot lighting and/or security lighting, when affixed to individual poles or affixed to any structure on site, shall not exceed a height of twenty (20) feet above the parking area surface.

6. Security or accent lighting for single-family residences shall be shielded to project downward or in a manner that the light is directed away from streets and adjoining properties.

Lighting would be limited to the hours of operation (daytime). Only security lighting would be on outside of the hours of operations. Therefore, the residences to the east would not be exposed to nighttime lighting. No further analysis is warranted.

Comment 7-6

The comment identifies traffic congestion as a concern.

Response to Comment 7-6

Level of service is no longer an impact analyzed under CEQA. However, as stated in the Traffic Impact Analysis (TIA) prepared for the Proposed Project, the proposed project shall contribute towards the Town of Apple Valley General Plan Circulation Element Program 1.A.4, Development Impact Fee program (Municipal Code Chapter 3.28) and regional transportation development mitigation fee program (County of San Bernardino Measure I). The Development Impact Fee provides a funding mechanism for arterial streets, traffic signals, interchange improvements as well as emergency services. The purpose of such fees is to minimize, to the greatest extent practicable, the impact that new development has on the Town's public services and public facilities. A fair share analysis was prepared to identify the share of project trips contributed to substantially impacted locations for which improvements are identified that may not be currently included in the Town's Development Impact Fee program. To the extent that any of the identified improvements are not included in the Town's Development Impact Fee program, the project would contribute towards those improvements on a fair share basis. The project fair share is based on the proportion of project peak hour trips contributed to the improvement location relative to the total new peak hour traffic volume.

Comment 7-7

The comment identifies the long-term upkeep of local roads due to heavier use as a concern.

Response to Comment 7-7

Refer to Response to Comment 6-6. The Development Impact Fee provides a funding mechanism for arterial streets, traffic signals, interchange improvements as well as emergency services. The purpose of such fees is to minimize, to the greatest extent practicable, the impact that new development has on the Town's public services and public facilities.

Comment 7-8

The comment concludes with opposition to approval of the facility.

Response to Comment 7-8

Comment noted.

Comment Letter 8 – Email from Marissa Galford Dated October 8, 2025

Comment 8-1

The Commenter requests the date of the upcoming hearing and states that she has concerns stating she has questions regarding the project.

Response to Comment 8-1

The comment does not raise any specific environmental issues related to the adequacy of the Draft MND, and no further response is required.

Comment Letter 9 – Email from Carlos Aguilera Dated October 14, 2025

Comment 9-1

The comment states the MND be rejected.

Response to Comment 9-1

The comment does not raise any specific environmental issues or questions related to the adequacy of the Draft MND, and no further response is required.

Comment Letter 10 – Email from Paulette Pereira Dated October 14, 2025

Comment 10-1

This comment is an introduction to the email expressing the sender's opposition to the project as a resident that would be next to the facility.

Response to Comment 10-1

Comment is introductory; no further response is required.

Comment 10-2

The comment identifies odor and air pollution (i.e. dust) that would be generated as causes for concern.

Response to Comment 10-2

As stated on page 25 of the Draft MND, the project would not exceed applicable MDAQMD regional thresholds either during construction or operational activities. Emissions that do not exceed the daily or annual emission significant thresholds are considered to result in less than significant localized impacts. Potential sources that may emit odors during the on-going operations of the Proposed Project would include odor emissions from vehicular emissions. Tractors would not be left to idle while they are parked, thereby temporally limiting odor emissions. Development of the Proposed Project will be conditioned to comply with current MDAQMD rules and regulations, which includes dust suppression, to minimize impacts to air quality. No further analysis is required.

Comment 10-3

The comment points out personal financial costs associated with the issues identified in Comment 10-2. The resident is also concerned about health-related impacts from air pollution.

Response to Comment 10-3

A Health Risk Assessment (HRA) was prepared for the Proposed Project and included in the Draft MND as Appendix D. The HRA concludes that the 30.25-year, cumulative carcinogenic health risk to an individual born during the opening year of the Proposed Project and living in the project vicinity for the entire cumulative risk duration, is maximum of 9.76 in a million. The EPA-established threshold is 10 in a million to be considered significant.). Therefore, as the maximum incremental cancer risk (MICR) does not exceed 10 in a million at the closest sensitive receptor locations in the project vicinity, no sensitive receptors would experience a significant impact due to the cancer risk from diesel emissions created by the Proposed Project. Using the maximum diesel particulate matter concentration from opening year (2026) emissions, the resulting Hazard Index is 0.0023 (see Appendix D of the Draft MND). The criterion for significance is a Hazard Index increase of 1.0 or greater. Therefore, the on-going operations of the Proposed Project would result in a less than significant impact due to the non-cancer risk from diesel emissions created by the Proposed Project. The project's economic impacts are not required to be analyzed under CEQA.

Comment 10-4

This comment identifies noise "from of operating engines, shifting gears, braking, horns, and overnight arriving and departure noise" and the financial costs with getting noise cancelling windows as a concern.

Response to Comment 10-4

A Noise Impact Analysis was prepared for the Proposed Project January 2, 2025 and revised on August 26, 2026 and is included in the Final IS/MND as Appendix L. The Noise Impact Analysis concluded:

Exterior Noise Impacts: Project exterior operational noise levels at residential zoned property lines are expected to range between 46 and 48 dBA Leq. therefore, the project will not exceed Town-established daytime exterior adjusted stationary noise standards. Further, project operational hours will be 7:00 AM until 5:00 PM and therefore will not violate nighttime noise standards. This impact is less than significant.

Interior Noise Impacts: Typical residential construction provides approximately 20 dB of exterior to interior noise reduction with windows closed and approximately 15 dB of reduction with windows open. Project operational noise will not cause daytime interior noise levels to exceed the Town's interior noise standard of 45 dBA Leq at nearby residential land uses. Project operational hours are 7:00 AM to 5:00 PM. Therefore, nighttime interior noise standards will not be exceeded.

Operational Noise Impacts – Offsite Vehicle Trips: A Noise Impact Analysis was prepared for the Proposed Project and is included as Appendix L to the Final IS/MND. Per the Town, a project traffic induced noise increase of 3 dBA or greater may be considered to be significant. The addition of project construction vehicles per day along off-site roadway segments would not be anticipated to result in a doubling of traffic volumes necessary to increase noise levels by 3 dBA. Off-site project generated construction vehicle trips would result in a negligible noise level increase and would not result in a substantial increase in ambient noise levels. Impacts would be less than significant. No mitigation measures are required. The addition of project trips is not expected to change noise levels in excess of the applicable threshold at any of the study roadway segments. Therefore, noise impacts would not exceed City thresholds.

Comment 10-5

The comment claims that the proposed 6-foot wall would be inadequate in addressing light and noise.

Response to Comment 10-5

As stated on page 17 of the Draft MND, the Town Municipal Code standards for lighting (Municipal Code 9.70.020) are as follows:

1. All lighting used in parking lots for security purposes or safety-related uses shall be scheduled so that light rays emitted by the fixture are projected below the imaginary horizontal plane passing through the lowest point of the fixture and in such a manner that the light is directed away from streets and adjoining properties.
2. If lighting is used or is necessary for color rendition, the primary lighting system shall be supplemented with a secondary lighting system which shall serve as security-level lighting and shall be the sole source of lighting during the nonoperating hours of each business.
3. Lighting standards and fixtures shall be of a design compatible with the architecture of onsite buildings.
4. Flashing lights are prohibited. The intensity of light at the boundary of any multi-family, commercial, or industrial zoning district shall not exceed seventy-five (75) foot lamberts from a source of reflected light.

5. Parking lot lighting and/or security lighting, when affixed to individual poles or affixed to any structure on site, shall not exceed a height of twenty (20) feet above the parking area surface.
6. Security or accent lighting for single-family residences shall be shielded to project downward or in a manner that the light is directed away from streets and adjoining properties.

Refer to Response to Comment 10-4.

Comment 10-6

This comment is regarding concerns related to water pollution from storm water and of hazardous materials spills.

Response to Comment 10-6

As stated on page 48 of the Draft MND, the Project Applicant will be required to comply with the Town of Apple Valley Code of Ordinances, 9.70.020 - Performance Standards for any handling, transportation, or storage of hazardous materials. the Project Operator will be required to comply with the Town's requirements for any hazardous materials handling and Town Fire Marshal approval, if required, would ensure less than significant impacts occur. In addition, the Proposed Project would be subject to the National Pollutant Discharge Elimination System (NPDES) permit which requires a Water Quality Management Plan (WQMP). The WQMP includes mandatory compliance of BMPs as well as compliance with NPDES Permit requirements. Refer to Section 4 of Draft MND Appendix K for project BMPs. As stated on page 56 of the Final IS/MND, the WQMP identifies an infiltration basin to capture and treat all storm flows generated on the Project Site to prevent degradation of surface and groundwater quality. Review and approval of the WQMP by the Town of Apple Valley is required and would ensure that all potential pollutants of concern are minimized or otherwise appropriately treated prior to being discharged from the Project Site. The Project Site has one drainage area (DA-1) with a design capture volume (DCV) of 15,744 CF. There will be an infiltration basin on the east side of the site, with drainage reaching the basin through curb cuts along the landscaped perimeter. The infiltration basin retention volume is 15,744 CF, achieving 100% retention of the DA-1 DCV. The stormwater infiltration basin would treat runoff by removing pollutants and allowing it to seep into the ground.

Comment 10-7

The comment is concern over the increase in truck traffic in the area and potential to destroy the roads.

Response to Comment 10-7

The proposed project shall contribute towards the Town of Apple Valley General Plan Circulation Element Program 1.A.4, Development Impact Fee program (Municipal Code Chapter 3.28) and regional transportation development mitigation fee program (County of San Bernardino Measure I). The Development Impact Fee provides a funding mechanism for arterial streets, traffic signals, interchange improvements as well as emergency services. The purpose of such fees is to minimize, to the greatest extent practicable, the impact that new development has on the Town's public services and public facilities. A fair share analysis was prepared to identify the share of project trips contributed to substantially impacted locations for which improvements are identified that may not be currently included in the Town's Development Impact Fee program. To the extent that any of the identified improvements are not included in the Town's Development Impact Fee program, the project would contribute towards those improvements on a fair share

basis. The project fair share is based on the proportion of project peak hour trips contributed to the improvement location relative to the total new peak hour traffic volume. No further analysis is warranted.

Comment 10-8

This comment is in regards to the project's impact on quality of life, property value, community character, and location of project adjacent to a residential community.

Response to Comment 10-8

The Final IS/MND Section XI provides more information on how the project is compatible with the community and surrounding uses: "the Proposed Project includes 150,844square-feet of perimeter landscape. A 26.37-foot linear landscape area comprised of shrubs proposed is proposed between the eastern wall and the eastern project boundary. With the inclusion of the 6-foot-wall and the landscape buffer, the light exposure, noise pollution, and visual impacts posed by the Proposed Project would be significantly minimized." Property value is not an impact analyzed under CEQA.

Comment 10-9

The comment disagrees with the description of "scattered housing."

Response to Comment 10-9

The description of the surrounding uses has been revised on pages 1, 2, 6, 52, 60, and 80 of the Final IS/MND. The updated language is as follows: "The Project Site is adjacent to a residential tract to the east and in a wider context, located in a relatively undeveloped area with scattered residential, commercial, and light industrial uses." The updated language does not change any determinations of significance initially made in the Draft MND.

Comment 10-10

Closing comment.

Response to Comment 10-10

Comment noted.

Comment Letter 11 – Email from Elaine Lauro Dated October 15, 2025

Comment 11-1

The Commenter states that they visited the Town's Planning Division to review the IS/MND and no hard copy was available.

Response to Comment 11-1

Comment noted; the IS/MND was available for public review on the Town's Planning Division website at "<https://www.applevalley.org/services/planning-division/environmental>."

Comment 11-2

This comment states that the NOI is an invitation for the public to comment on the MND but the lack of printed copies limits access to review the document.

Response to Comment 11-2

Comment noted. CEQA does not have a specific requirement for lead agencies to make printed hard copies of the Mitigated Negative Declaration available to the public during the Notice of Intent public review period. The document was made readily available for public review on the Town's environmental website. CEQA requires public notice and provision of a public review period for the Initial Study-MND. The Notice of Intent included the Town Hall address at which the MND and all documents incorporated by reference were made available for public review, as well as a hyperlink to all environmental documents on the Town website. This ensured that the public was readily able to view the environmental document electronically on the Town's website, State Clearinghouse, or by visiting the Town Hall offices and request to view the document electronically on the Town Hall computer.

Comment 11-3

The comment is a request to make hard copies of the IS available at the Planning Division or public library during the public review period.

Response to Comment 11-3

Comment noted. CEQA does not have a specific requirement for lead agencies to make printed hard copies of the Mitigated Negative Declaration available to the public during the Notice of Intent public review period. The document was made readily available for public review on the Town's environmental website. CEQA requires public notice and provision of a public review period for the Initial Study-MND. The Notice of Intent included the Town Hall address at which the MND and all documents incorporated by reference were made available for public review, as well as a hyperlink to all environmental documents on the Town website. This ensured that the public was readily able to view the environmental document electronically on the Town's website, State Clearinghouse, or by visiting the Town Hall offices and request to view the document electronically on the Town Hall computer.

Comment 11-4

The comment is a request for confirmation that the public review will be extended.

Response to Comment 11-4

Comment noted. The IS/MND Notice of Intent 30-day public comment period was originally scheduled to expire on October 5, 2025. It was extended by 11 calendar days, with a final

expiration date of October 16, 2025, in order to ensure that all members of the public wishing to submit comments had opportunity to do so. An updated Notice of Intent was direct mailed to all properties as noted on the 1,300-foot radius mailing list on September 25, 2025.

Comment 11-5

This comment is a closing statement requesting confirmation of receipt of the email and when a hard copy will be available.

Response to Comment 11-5

Comment noted. CEQA does not have a specific requirement for lead agencies to make printed hard copies of the Mitigated Negative Declaration available to the public during the Notice of Intent public review period. The document was made readily available for public review on the Town's environmental website. CEQA requires public notice and provision of a public review period for the Initial Study-MND. The Notice of Intent included the Town Hall address at which the MND and all documents incorporated by reference were made available for public review, as well as a hyperlink to all environmental documents on the Town website. This ensured that the public was readily able to view the environmental document electronically on the Town's website, State Clearinghouse, or by visiting the Town Hall offices and request to view the document electronically on the Town Hall computer.

Comment Letter 12 – Email from Joey Lauro Dated October 16, 2025

Comment 12-1

This comment is an introduction presenting the Commenter's opposition to the Proposed Project.

Response to 12-1

Comment is introductory; no further response is required.

Comment 12-2

The Commenter asserts that the Proposed Project poses environmental and safety concerns, with an introduction to the reasons to follow.

Response to Comment 12-2

The comment does not raise any specific environmental issues or questions related to the adequacy of the Draft MND, and no further response is required.

Comment 12-3

The comment identifies traffic and safety risks as a concern.

Response to Comment 12-3

As stated in the Traffic Impact Analysis (TIA), vehicle stacking at the proposed gated access points was evaluated to ensure adequate on-site vehicle storage length allows vehicles a place to wait for the gate to open without blocking the public right-of-way. Based on the inbound volume, the forecast queue length of 75 feet (approximately one truck or three cars) and the storage capacity of 135 feet, the gates have sufficient storage to accommodate the forecast queue length. Furthermore, designated truck routes in the study area include Waalew Road, Dale Evans Parkway and Navajo Road south of Waalew Road. These are roads that would be utilized by project trucks.

The Proposed Project shall contribute towards the Town of Apple Valley General Plan Circulation Element Program 1.A.4, Development Impact Fee program (Municipal Code Chapter 3.28) and regional transportation development mitigation fee program (County of San Bernardino Measure I). The Development Impact Fee provides a funding mechanism for arterial streets, traffic signals, interchange improvements as well as emergency services. The purpose of such fees is to minimize, to the greatest extent practicable, the impact that new development has on the Town's public services and public facilities. A fair share analysis was prepared to identify the share of project trips contributed to substantially impacted locations for which improvements are identified that may not be currently included in the Town's Development Impact Fee program. To the extent that any of the identified improvements are not included in the Town's Development Impact Fee program, the project would contribute towards those improvements on a fair share basis. The project fair share is based on the proportion of project peak hour trips contributed to the improvement location relative to the total new peak hour traffic volume.

Comment 12-4

This comment claims that the operation of diesel trucks daily will significantly increase air pollution and noise, harming residents' health and well-being.

Response to Comment 12-4

As concluded in the Draft MND, the Proposed Project's emissions, which include diesel emissions, do not exceed applicable MDAQMD regional thresholds either during construction or operational activities. It would not violate any air quality standard or contribute substantially to an existing or projected air quality violation. The Proposed Project would not result in construction emissions that exceed the MDAQMD significant thresholds; therefore, localized impacts during construction are considered less than significant. MDAQMD currently does not require the evaluation of long-term excess cancer risk or chronic health impacts for a short-term project when construction activities would not exceed the regional significance thresholds. As identified above, construction-related particulate matter emissions would be substantially below the MDAQMD's regional thresholds. Overall, exposure to on- and off-site receptors would be limited. As such, it is anticipated that construction emissions would not pose a threat to off-site receptors near the Project Site, and project-related construction health impacts would be less than significant.

A Health Risk Assessment (HRA) was prepared for the Proposed Project and included in the MND as Appendix D. The HRA concludes that the 30.25-year, cumulative carcinogenic health risk to an individual born during the opening year of the Proposed Project and living in the project vicinity for the entire cumulative risk duration, is maximum of 9.76 in a million. The EPA-established threshold is 10 in a million to be considered significant.). Therefore, as the maximum incremental cancer risk (MICR) does not exceed 10 in a million at the closest sensitive receptor locations in the project vicinity, no sensitive receptors would experience a significant impact due to the cancer risk from diesel emissions created by the Proposed Project. Using the maximum diesel particulate matter concentration from opening year (2026) emissions, the resulting Hazard Index is 0.0023 (see Appendix D of the Draft MND). The criterion for significance is a Hazard Index increase of 1.0 or greater. Therefore, the on-going operations of the Proposed Project would result in a less than significant impact due to the non-cancer risk from diesel emissions created by the Proposed Project. The on-going operations of the Proposed Project would result in a less than significant impact due to the non-cancer risk from diesel emissions created by the Proposed Project. Noise generated by the project would not exceed Town thresholds.

A Noise Impact Analysis was prepared for the Proposed Project January 2, 2025 and revised on August 26, 2026 and is included in the Final IS/MND as Appendix L. The Noise Impact Analysis concluded:

Exterior Noise Impacts: Project exterior operational noise levels at residential zoned property lines are expected to range between 46 and 48 dBA Leq. therefore, the project will not exceed Town-established daytime exterior adjusted stationary noise standards. Further, project operational hours will be 7:00 AM until 5:00 PM and therefore will not violate nighttime noise standards. This impact is less than significant.

Interior Noise Impacts: Typical residential construction provides approximately 20 dB of exterior to interior noise reduction with windows closed and approximately 15 dB of reduction with windows open. Project operational noise will not cause daytime interior noise levels to exceed the Town's interior noise standard of 45 dBA Leq at nearby residential land uses. Project operational hours are 7:00 AM to 5:00 PM. Therefore, nighttime interior noise standards will not be exceeded.

Operational Noise Impacts – Offsite Vehicle Trips: A Noise Impact Analysis was prepared for the Proposed Project and is included as Appendix L to the Final IS/MND. Per the Town, a project traffic induced noise increase of 3 dBA or greater may be considered to be significant. The addition of project construction vehicles per day along off-site roadway segments would not be anticipated to

result in a doubling of traffic volumes necessary to increase noise levels by 3 dBA. Off-site project generated construction vehicle trips would result in a negligible noise level increase and would not result in a substantial increase in ambient noise levels. Impacts would be less than significant. No mitigation measures are required. The addition of project trips is not expected to change noise levels in excess of the applicable threshold at any of the study roadway segments.

Comment 12-5

The comment is concern about project's lighting, paving, and stormwater runoff effects on the existing environment, namely groundwater, wildlife, and the natural character of the area.

Response to Comment 12-5

As stated in the Draft MND, the design and placement of light fixtures for the Proposed Project would be consistent with the Town Municipal Code standards for lighting (Municipal Code 9.70.020), as follows:

7. All lighting used in parking lots for security purposes or safety-related uses shall be scheduled so that light rays emitted by the fixture are projected below the imaginary horizontal plane passing through the lowest point of the fixture and in such a manner that the light is directed away from streets and adjoining properties.
8. If lighting is used or is necessary for color rendition, the primary lighting system shall be supplemented with a secondary lighting system which shall serve as security-level lighting and shall be the sole source of lighting during the nonoperating hours of each business.
9. Lighting standards and fixtures shall be of a design compatible with the architecture of onsite buildings.
10. Flashing lights are prohibited. The intensity of light at the boundary of any multi-family, commercial, or industrial zoning district shall not exceed seventy-five (75) foot lamberts from a source of reflected light.
11. Parking lot lighting and/or security lighting, when affixed to individual poles or affixed to any structure on site, shall not exceed a height of twenty (20) feet above the parking area surface.
12. Security or accent lighting for single-family residences shall be shielded to project downward or in a manner that the light is directed away from streets and adjoining properties.

The hours of operation are limited to 7:00 AM to 5:00 PM. Only security-level lights would be on between 5:00 PM and 7:00 AM. Furthermore, as the Proposed Project operational hours will be 7:00 AM until 5:00 PM, it will not violate nighttime noise standards (35 dBA Leq at residential uses). The Final IS/MND includes Mitigation Measures BIO-1 to BIO-3 ensure no significant impacts to wildlife occur.

The Proposed Project would be subject to the National Pollutant Discharge Elimination System (NPDES) permit which requires a Water Quality Management Plan (WQMP). The WQMP includes mandatory compliance of BMPs as well as compliance with NPDES Permit requirements. Refer to Section 4 of Draft MND Appendix K for project BMPs. As stated in the Draft MND, the WQMP identifies an infiltration basin to capture and treat all storm flows generated on the Project Site to prevent degradation of surface and groundwater quality. Review and approval of the WQMP by the Town of Apple Valley is required and would ensure that all potential pollutants of concern are minimized or otherwise appropriately treated prior to being discharged from the Project Site. As

stated in page 56 of the Final IS/MND, the Project Site has one drainage area (DA-1) with a design capture volume (DCV) of 15,744 CF. There will be an infiltration basin on the east side of the site, with drainage reaching the basin through curb cuts along the landscaped perimeter. The infiltration basin retention volume is 15,744 CF, achieving 100% retention of the DA-1 DCV. The stormwater infiltration basin would treat runoff by removing pollutants and allowing it to seep into the ground.

Comment 12-6

This comment is in regards to the project's impact on property value and community character.

Response to Comment 12-6

The currently vacant Project Site is designated in the General Plan as Planned Industrial (I-P) and has a zoning of Planned Industrial. The I-P land use designation allows high quality, non-polluting industrial land uses, either as free-standing uses or as part of master planned industrial parks. Uses permitted include warehousing, light manufacturing, research and development and administrative facilities. The I-P zoning district is intended to provide for light industrial uses, research and development, and multi-tenant industrial buildings, as well as certain supporting administrative and professional offices and commercial activities on a limited basis in an attractive and pleasant working environment.

This district implements the Planned Industrial (I-P) designation of the General Plan. The Proposed Project is the development of a truck and trailer parking facility and would be subject to the development standards required for uses within the I-P zoning district. Subject to a CUP, the Proposed Project is an allowable use under the I-P zoning district.

The Proposed Project includes 150,844 square-feet of perimeter landscape. A 26.37-foot linear landscape area comprised of shrubs proposed is proposed between the eastern wall and the eastern project boundary. With the inclusion of the 6-foot-wall and the landscape buffer, the light exposure, noise pollution, and visual impacts posed by the Proposed Project would be significantly minimized." Property value is not an impact analyzed under CEQA.

Comment 12-7

The Commenter believes the above stated environmental issues constitute substantial evidence of potential environmental impacts and that an EIR must be prepared instead of an MND.

Response to Comment 12-7

Per CEQA Public Resources Code 15074, "the decision-making body of the lead agency shall consider the proposed negative declaration or mitigated negative declaration together with any comments received during the public review process. The decision-making body shall adopt the proposed negative declaration or mitigated negative declaration only if it finds on the basis of the whole record before it (including the initial study and any comments received), that there is no substantial evidence that the project will have a significant effect on the environment and that the negative declaration or mitigated negative declaration reflects the lead agency's independent judgment and analysis."

As concluded in the Draft MND, with implementation of identified mitigation measures, the Proposed Project would not result in significant unavoidable environmental impacts. The Town asserts that the Proposed Project would not require a full EIR.

Comment 12-8

This comment is a list of actions requested by the Commenter regarding the project and the environmental report, namely: to reject the MND, require an EIR, and explore more appropriate locations for this type of industrial use.

Response to Comment 12-8

See Responses to Comments 12-3 through 12-8.

The currently vacant Project Site is designated in the General Plan as Planned Industrial (I-P) and has a zoning of Planned Industrial. The I-P land use designation allows high quality, non-polluting industrial land uses, either as free-standing uses or as part of master planned industrial parks. Uses permitted include warehousing, light manufacturing, research and development and administrative facilities. The I-P zoning district is intended to provide for light industrial uses, research and development, and multi-tenant industrial buildings, as well as certain supporting administrative and professional offices and commercial activities on a limited basis in an attractive and pleasant working environment.

Comment 12-9

Closing comment.

Response to Comment 12-9

Comment noted.

Comment Letter 13 – Email from Mike and Mary Lisa Chandler Dated October 16, 2025

Comment 13-1

The comment is an introduction confirming the Commenter's receipt of the Notice of Intent and provides a brief description of the project.

Response to Comment 13-1

Comment is introductory; no further response is required.

Comment 13-2

This comment identifies the following concerns about the project: air pollution, idling of trucks causing sound pollution, and traffic safety (specifically hazards posed by trucks entering/exiting Waalew Road).

Response to Comment 13-2

As concluded in the Draft MND, the Proposed Project does not exceed applicable MDAQMD regional thresholds either during construction or operational activities. It would not violate any air quality standard or contribute substantially to an existing or projected air quality violation. A Health Risk Assessment (HRA) was prepared for the Proposed Project and included in the MND as Appendix D. The HRA concludes that the 30.25-year, cumulative carcinogenic health risk to an individual born during the opening year of the Proposed Project and living in the project vicinity for the entire cumulative risk duration, is maximum of 9.76 in a million. The EPA-established threshold is 10 in a million to be considered significant.). Therefore, as the maximum incremental cancer risk (MICR) does not exceed 10 in a million at the closest sensitive receptor locations in the project vicinity, no sensitive receptors would experience a significant impact due to the cancer risk from diesel emissions created by the Proposed Project. Using the maximum diesel particulate matter concentration from opening year (2026) emissions, the resulting Hazard Index is 0.0023 (see Appendix D of the Draft MND). The criterion for significance is a Hazard Index increase of 1.0 or greater. Therefore, the on-going operations of the Proposed Project would result in a less than significant impact due to the non-cancer risk from diesel emissions created by the Proposed Project. The on-going operations of the Proposed Project would result in a less than significant impact due to the non-cancer risk from diesel emissions created by the Proposed Project.

The Proposed Project does not include the use of refrigerated trucks; there is no associated warehouse use. As stated in the Draft MND, tractors would not be left to idle while they are parked. The following sentence has been added to the Final IS/MND for clarification: "As required by California Code of Regulations Title 13, Motor Vehicles, Section 2449(d)(3) Idling, limits idling times of construction vehicles to no more than five minutes, thereby minimizing or eliminating unnecessary and wasteful consumption of fuel due to unproductive idling of construction equipment."

As stated in the Traffic Impact Analysis (TIA), projects within a 1.5-mile radius of the project site are included in the cumulative analysis. Trips generated by other pending or approved but unconstructed developments in the Town were reviewed and added to future volume forecasts. See Table 3 of TIA. The planned Dale Evans Parkway at Waalew Road Realignment project includes realigning Dale Evans Parkway on the north leg to align with Dale Evans Parkway on the south leg, installing traffic signals and improving pedestrian crossing. This project is funded and has a preliminary schedule for construction with completion in 2027. Moreover, the proposed project shall contribute towards the Town of Apple Valley General Plan Circulation Element

Program 1.A.4, Development Impact Fee program (Municipal Code Chapter 3.28) and regional transportation development mitigation fee program (County of San Bernardino Measure I). The Development Impact Fee provides a funding mechanism for arterial streets, traffic signals, interchange improvements as well as emergency services. The purpose of such fees is to minimize, to the greatest extent practicable, the impact that new development has on the Town's public services and public facilities. A fair share analysis was prepared to identify the share of project trips contributed to substantially impacted locations for which improvements are identified that may not be currently included in the Town's Development Impact Fee program. To the extent that any of the identified improvements are not included in the Town's Development Impact Fee program, the project would contribute towards those improvements on a fair share basis. The project fair share is based on the proportion of project peak hour trips contributed to the improvement location relative to the total new peak hour traffic volume.

In addition, vehicle stacking at the proposed gated access points was evaluated in the TIA to ensure adequate on-site vehicle storage length allows vehicles a place to wait for the gate to open without blocking the public right-of-way. Based on the inbound volume, the forecast queue length of 75 feet (approximately one truck or three cars) and the storage capacity of 135 feet, the gates have sufficient storage to accommodate the forecast queue length.

Comment 13-3

The comment claims that the property should be zoned residential.

Response to Comment 13-3

The project is consistent with the property zoning of industrial. Therefore, the development of the project has been projected in the General Plan and evaluated in the General Plan EIR, August 2009. No further analysis is required.

Comment 13-4

The Commenter states that they are located within the mailing radius and would appreciate the Town's consideration of the families in the area.

Response to Comment 13-4

Comment noted.

Comment 13-5

This comment is a request to be informed of the Planning Commission hearing date.

Response to Comment 13-5

Comment noted.

Comment Letter 14 – Email from Cristian Ramirez Dated October 18, 2025

Comment 14-1

This comment presents the Commenter's opposition to the project due to the increase in diesel emissions, impacts on air quality, noise pollution, and heavy truck traffic in proximity of residential areas, which would create health and safety impacts.

Response to Comment 14-1

As stated in the Draft MND, the project would not exceed applicable MDAQMD regional thresholds either during construction or operational activities. Emissions that do not exceed the daily or annual emission significant thresholds are considered to result in less than significant localized impacts. Potential sources that may emit odors during the on-going operations of the Proposed Project would include odor emissions from vehicular emissions. Tractors would not be left to idle while they are parked, thereby temporally limiting odor emissions. Development of the Proposed Project will be conditioned to comply with current MDAQMD rules and regulations, which includes dust suppression, to minimize impacts to air quality. As concluded in the Draft MND, the Proposed Project does not exceed applicable MDAQMD regional thresholds either during construction or operational activities. It would not violate any air quality standard or contribute substantially to an existing or projected air quality violation.

A Health Risk Assessment (HRA) was prepared for the Proposed Project and included in the MND as Appendix D. The HRA concludes that the 30.25-year, cumulative carcinogenic health risk to an individual born during the opening year of the Proposed Project and living in the project vicinity for the entire cumulative risk duration, is maximum of 9.76 in a million. The EPA-established threshold is 10 in a million to be considered significant.). Therefore, as the maximum incremental cancer risk (MICR) does not exceed 10 in a million at the closest sensitive receptor locations in the project vicinity, no sensitive receptors would experience a significant impact due to the cancer risk from diesel emissions created by the Proposed Project. Using the maximum diesel particulate matter concentration from opening year (2026) emissions, the resulting Hazard Index is 0.0023 (see Appendix D of the Draft MND). The criterion for significance is a Hazard Index increase of 1.0 or greater. Therefore, the on-going operations of the Proposed Project would result in a less than significant impact due to the non-cancer risk from diesel emissions created by the Proposed Project. The on-going operations of the Proposed Project would result in a less than significant impact due to the non-cancer risk from diesel emissions created by the Proposed Project.

The Proposed Project does not include the use of refrigerated trucks; there is no associated warehouse use. As stated in the Draft MND, tractors would not be left to idle while they are parked. The following sentence has been added to the Final IS/MND for clarification: "As required by California Code of Regulations Title 13, Motor Vehicles, Section 2449(d)(3) Idling, limits idling times of construction vehicles to no more than five minutes, thereby minimizing or eliminating unnecessary and wasteful consumption of fuel due to unproductive idling of construction equipment."

A Noise Impact Analysis was prepared for the Proposed Project January 2, 2025 and revised on August 26, 2026 and is included in the Final IS/MND as Appendix L. The Noise Impact Analysis concluded:

Exterior Noise Impacts: Project exterior operational noise levels at residential zoned property lines are expected to range between 46 and 48 dBA Leq. therefore, the project will not exceed Town-established daytime exterior adjusted stationary noise standards. Further, project

operational hours will be 7:00 AM until 5:00 PM and therefore will not violate nighttime noise standards. This impact is less than significant.

Interior Noise Impacts: Typical residential construction provides approximately 20 dB of exterior to interior noise reduction with windows closed and approximately 15 dB of reduction with windows open. Project operational noise will not cause daytime interior noise levels to exceed the Town's interior noise standard of 45 dBA Leq at nearby residential land uses. Project operational hours are 7:00 AM to 5:00 PM. Therefore, nighttime interior noise standards will not be exceeded.

Operational Noise Impacts – Offsite Vehicle Trips: A Noise Impact Analysis was prepared for the Proposed Project and is included as Appendix L to the Final IS/MND. Per the Town, a project traffic induced noise increase of 3 dBA or greater may be considered to be significant. The addition of project construction vehicles per day along off-site roadway segments would not be anticipated to result in a doubling of traffic volumes necessary to increase noise levels by 3 dBA. Off-site project generated construction vehicle trips would result in a negligible noise level increase and would not result in a substantial increase in ambient noise levels. Impacts would be less than significant. No mitigation measures are required. The addition of project trips is not expected to change noise levels in excess of the applicable threshold at any of the study roadway segments.

As stated in the Traffic Impact Analysis (TIA), projects within a 1.5-mile radius of the project site are included in the cumulative analysis. Trips generated by other pending or approved but unconstructed developments in the Town were reviewed and added to future volume forecasts. See Table 3 of TIA. The planned Dale Evans Parkway at Waalew Road Realignment project includes realigning Dale Evans Parkway on the north leg to align with Dale Evans Parkway on the south leg, installing traffic signals and improving pedestrian crossing. This project is funded and has a preliminary schedule for construction with completion in 2027. Moreover, the proposed project shall contribute towards the Town of Apple Valley General Plan Circulation Element Program 1.A.4, Development Impact Fee program (Municipal Code Chapter 3.28) and regional transportation development mitigation fee program (County of San Bernardino Measure I). The Development Impact Fee provides a funding mechanism for arterial streets, traffic signals, interchange improvements as well as emergency services. The purpose of such fees is to minimize, to the greatest extent practicable, the impact that new development has on the Town's public services and public facilities. A fair share analysis was prepared to identify the share of project trips contributed to substantially impacted locations for which improvements are identified that may not be currently included in the Town's Development Impact Fee program. To the extent that any of the identified improvements are not included in the Town's Development Impact Fee program, the project would contribute towards those improvements on a fair share basis. The project fair share is based on the proportion of project peak hour trips contributed to the improvement location relative to the total new peak hour traffic volume.

In addition, vehicle stacking at the proposed gated access points was evaluated in the TIA to ensure adequate on-site vehicle storage length allows vehicles a place to wait for the gate to open without blocking the public right-of-way. Based on the inbound volume, the forecast queue length of 75 feet (approximately one truck or three cars) and the storage capacity of 135 feet, the gates have sufficient storage to accommodate the forecast queue length.

Comment 14-2

The comment requests that the Planning Commission require a full EIR.

Response to Comment 14-2

Per CEQA Public Resources Code 15074, “the decision-making body of the lead agency shall consider the proposed negative declaration or mitigated negative declaration together with any comments received during the public review process. The decision-making body shall adopt the proposed negative declaration or mitigated negative declaration only if it finds on the basis of the whole record before it (including the initial study and any comments received), that there is no substantial evidence that the project will have a significant effect on the environment and that the negative declaration or mitigated negative declaration reflects the lead agency’s independent judgment and analysis.”

As concluded in the Draft MND, with implementation of identified mitigation measures, the Proposed Project would not result in significant unavoidable environmental impacts. The Town asserts that the Proposed Project would not require a full EIR.

Comment 14-3

This comment is a request to be notified of the public hearing date.

Response to Comment 14-3

Comment noted.

Comment Letter 15 – Email from Janae Escobar Dated October 18, 2025

Comment 15-1

This comment presents the Commenter's opposition to the project due to the increase in diesel emissions, impacts on air quality, noise pollution, and heavy truck traffic in proximity of residential areas, which would create health and safety impacts.

Response to Comment 15-1

As stated in the Draft MND, the project would not exceed applicable MDAQMD regional thresholds either during construction or operational activities. Emissions that do not exceed the daily or annual emission significant thresholds are considered to result in less than significant localized impacts. Potential sources that may emit odors during the on-going operations of the Proposed Project would include odor emissions from vehicular emissions. Tractors would not be left to idle while they are parked, thereby temporally limiting odor emissions. Development of the Proposed Project will be conditioned to comply with current MDAQMD rules and regulations, which includes dust suppression, to minimize impacts to air quality. As concluded in the Draft MND, the Proposed Project does not exceed applicable MDAQMD regional thresholds either during construction or operational activities. It would not violate any air quality standard or contribute substantially to an existing or projected air quality violation.

A Health Risk Assessment (HRA) was prepared for the Proposed Project and included in the Draft MND as Appendix D. The HRA concludes that the 30.25-year, cumulative carcinogenic health risk to an individual born during the opening year of the Proposed Project and living in the project vicinity for the entire cumulative risk duration, is maximum of 9.76 in a million. The EPA-established threshold is 10 in a million to be considered significant.). Therefore, as the maximum incremental cancer risk (MICR) does not exceed 10 in a million at the closest sensitive receptor locations in the project vicinity, no sensitive receptors would experience a significant impact due to the cancer risk from diesel emissions created by the Proposed Project. Using the maximum diesel particulate matter concentration from opening year (2026) emissions, the resulting Hazard Index is 0.0023 (see Appendix D of the Draft MND). The criterion for significance is a Hazard Index increase of 1.0 or greater. Therefore, the on-going operations of the Proposed Project would result in a less than significant impact due to the non-cancer risk from diesel emissions created by the Proposed Project. The on-going operations of the Proposed Project would result in a less than significant impact due to the non-cancer risk from diesel emissions created by the Proposed Project.

The Proposed Project does not include the use of refrigerated trucks; there is no associated warehouse use. As stated in the Draft MND, tractors would not be left to idle while they are parked. The following sentence has been added to the Final IS/MND for clarification: "As required by California Code of Regulations Title 13, Motor Vehicles, Section 2449(d)(3) Idling, limits idling times of construction vehicles to no more than five minutes, thereby minimizing or eliminating unnecessary and wasteful consumption of fuel due to unproductive idling of construction equipment."

A Noise Impact Analysis was prepared for the Proposed Project January 2, 2025 and revised on August 26, 2026 and is included in the Final IS/MND as Appendix L. The Noise Impact Analysis concluded:

Exterior Noise Impacts: Project exterior operational noise levels at residential zoned property lines are expected to range between 46 and 48 dBA Leq. therefore, the project will not exceed Town-established daytime exterior adjusted stationary noise standards. Further, project

operational hours will be 7:00 AM until 5:00 PM and therefore will not violate nighttime noise standards. This impact is less than significant.

Interior Noise Impacts: Typical residential construction provides approximately 20 dB of exterior to interior noise reduction with windows closed and approximately 15 dB of reduction with windows open. Project operational noise will not cause daytime interior noise levels to exceed the Town's interior noise standard of 45 dBA Leq at nearby residential land uses. Project operational hours are 7:00 AM to 5:00 PM. Therefore, nighttime interior noise standards will not be exceeded.

Operational Noise Impacts – Offsite Vehicle Trips: A Noise Impact Analysis was prepared for the Proposed Project and is included as Appendix L to the Final IS/MND. Per the Town, a project traffic induced noise increase of 3 dBA or greater may be considered to be significant. The addition of project construction vehicles per day along off-site roadway segments would not be anticipated to result in a doubling of traffic volumes necessary to increase noise levels by 3 dBA. Off-site project generated construction vehicle trips would result in a negligible noise level increase and would not result in a substantial increase in ambient noise levels. Impacts would be less than significant. No mitigation measures are required. The addition of project trips is not expected to change noise levels in excess of the applicable threshold at any of the study roadway segments.

As stated in the Traffic Impact Analysis (TIA), projects within a 1.5-mile radius of the project site are included in the cumulative analysis. Trips generated by other pending or approved but unconstructed developments in the Town were reviewed and added to future volume forecasts. See Table 3 of TIA. The planned Dale Evans Parkway at Waalew Road Realignment project includes realigning Dale Evans Parkway on the north leg to align with Dale Evans Parkway on the south leg, installing traffic signals and improving pedestrian crossing. This project is funded and has a preliminary schedule for construction with completion in 2027. Moreover, the proposed project shall contribute towards the Town of Apple Valley General Plan Circulation Element Program 1.A.4, Development Impact Fee program (Municipal Code Chapter 3.28) and regional transportation development mitigation fee program (County of San Bernardino Measure I). The Development Impact Fee provides a funding mechanism for arterial streets, traffic signals, interchange improvements as well as emergency services. The purpose of such fees is to minimize, to the greatest extent practicable, the impact that new development has on the Town's public services and public facilities. A fair share analysis was prepared to identify the share of project trips contributed to substantially impacted locations for which improvements are identified that may not be currently included in the Town's Development Impact Fee program. To the extent that any of the identified improvements are not included in the Town's Development Impact Fee program, the project would contribute towards those improvements on a fair share basis. The project fair share is based on the proportion of project peak hour trips contributed to the improvement location relative to the total new peak hour traffic volume.

In addition, vehicle stacking at the proposed gated access points was evaluated in the TIA to ensure adequate on-site vehicle storage length allows vehicles a place to wait for the gate to open without blocking the public right-of-way. Based on the inbound volume, the forecast queue length of 75 feet (approximately one truck or three cars) and the storage capacity of 135 feet, the gates have sufficient storage to accommodate the forecast queue length.

Comment 15-2

The comment requests that the Planning Commission require a full EIR.

Response to Comment 15-2

Per CEQA Public Resources Code 15074, “the decision-making body of the lead agency shall consider the proposed negative declaration or mitigated negative declaration together with any comments received during the public review process. The decision-making body shall adopt the proposed negative declaration or mitigated negative declaration only if it finds on the basis of the whole record before it (including the initial study and any comments received), that there is no substantial evidence that the project will have a significant effect on the environment and that the negative declaration or mitigated negative declaration reflects the lead agency’s independent judgment and analysis.”

As concluded in the Draft MND, with implementation of identified mitigation measures, the Proposed Project would not result in significant unavoidable environmental impacts. The Town asserts that the Proposed Project would not require a full EIR.

Comment 15-3

This comment is a request to be notified of the public hearing date.

Response to Comment 15-3

Comment noted.

Comment Letter 16 – Email from Elaine Lauro Dated October 27, 2025

Comment 16-1

The comment expresses the Commenter's opposition to the project.

Response to Comment 16-1

The comment does not raise any specific environmental issues or questions related to the adequacy of the Draft MND, and no further response is required.

Comment 16-2

Commenter reminds the Town Council and staff of their responsibility to the community.

Response to Comment 16-2

Comment noted.

Comment 16-3

The comment is a concern about the truck traffic (high truck volumes and inadequate turning radii) generated and the resulting safety hazards.

Response to Comment 16-3

As stated in the Traffic Impact Analysis (TIA), vehicle stacking at the proposed gated access points was evaluated to ensure adequate on-site vehicle storage length allows vehicles a place to wait for the gate to open without blocking the public right-of-way. Based on the inbound volume, the forecast queue length of 75 feet (approximately one truck or three cars) and the storage capacity of 135 feet, the gates have sufficient storage to accommodate the forecast queue length. Furthermore, designated truck routes in the study area include Waalew Road, Dale Evans Parkway and Navajo Road south of Waalew Road. These are roads that would be utilized by project trucks.

The Proposed Project shall contribute towards the Town of Apple Valley General Plan Circulation Element Program 1.A.4, Development Impact Fee program (Municipal Code Chapter 3.28) and regional transportation development mitigation fee program (County of San Bernardino Measure I). The Development Impact Fee provides a funding mechanism for arterial streets, traffic signals, interchange improvements as well as emergency services. The purpose of such fees is to minimize, to the greatest extent practicable, the impact that new development has on the Town's public services and public facilities. A fair share analysis was prepared to identify the share of project trips contributed to substantially impacted locations for which improvements are identified that may not be currently included in the Town's Development Impact Fee program. To the extent that any of the identified improvements are not included in the Town's Development Impact Fee program, the project would contribute towards those improvements on a fair share basis. The project fair share is based on the proportion of project peak hour trips contributed to the improvement location relative to the total new peak hour traffic volume.

Comment 16-4

The comment is concerning exposure of diesel exhaust and particulate matter to residents, leading to health impacts. In addition, trucks would also degrade air quality and generate excessive noise.

Response to Comment 16-4

As concluded in the Draft MND, the Proposed Project's emissions, which include diesel emissions, do not exceed applicable MDAQMD regional thresholds either during construction or operational activities. It would not violate any air quality standard or contribute substantially to an existing or projected air quality violation. The Proposed Project would not result in construction emissions that exceed the MDAQMD significant thresholds; therefore, localized impacts during construction are considered less than significant. MDAQMD currently does not require the evaluation of long-term excess cancer risk or chronic health impacts for a short-term project when construction activities would not exceed the regional significance thresholds. As identified above, construction-related particulate matter emissions would be substantially below the MDAQMD's regional thresholds. Overall, exposure to on- and off-site receptors would be limited. As such, it is anticipated that construction emissions would not pose a threat to off-site receptors near the Project Site, and project-related construction health impacts would be less than significant.

A Health Risk Assessment (HRA) was prepared for the Proposed Project and included in the Draft MND as Appendix D. The HRA concludes that the 30.25-year, cumulative carcinogenic health risk to an individual born during the opening year of the Proposed Project and living in the project vicinity for the entire cumulative risk duration, is maximum of 9.76 in a million. The EPA-established threshold is 10 in a million to be considered significant.). Therefore, as the maximum incremental cancer risk (MICR) does not exceed 10 in a million at the closest sensitive receptor locations in the project vicinity, no sensitive receptors would experience a significant impact due to the cancer risk from diesel emissions created by the Proposed Project. Using the maximum diesel particulate matter concentration from opening year (2026) emissions, the resulting Hazard Index is 0.0023 (see Appendix D of the Draft MND). The criterion for significance is a Hazard Index increase of 1.0 or greater. Therefore, the on-going operations of the Proposed Project would result in a less than significant impact due to the non-cancer risk from diesel emissions created by the Proposed Project. The on-going operations of the Proposed Project would result in a less than significant impact due to the non-cancer risk from diesel emissions created by the Proposed Project. Noise generated by the project would not exceed Town thresholds.

A Noise Impact Analysis was prepared for the Proposed Project January 2, 2025 and revised on August 26, 2026 and is included in the Final IS/MND as Appendix L. The Noise Impact Analysis concluded:

Exterior Noise Impacts: Project exterior operational noise levels at residential zoned property lines are expected to range between 46 and 48 dBA Leq. therefore, the project will not exceed Town-established daytime exterior adjusted stationary noise standards. Further, project operational hours will be 7:00 AM until 5:00 PM and therefore will not violate nighttime noise standards. This impact is less than significant.

Interior Noise Impacts: Typical residential construction provides approximately 20 dB of exterior to interior noise reduction with windows closed and approximately 15 dB of reduction with windows open. Project operational noise will not cause daytime interior noise levels to exceed the Town's interior noise standard of 45 dBA Leq at nearby residential land uses. Project operational hours are 7:00 AM to 5:00 PM. Therefore, nighttime interior noise standards will not be exceeded.

Operational Noise Impacts – Offsite Vehicle Trips: A Noise Impact Analysis was prepared for the Proposed Project and is included as Appendix L to the Final IS/MND. Per the Town, a project traffic induced noise increase of 3 dBA or greater may be considered to be significant. The addition of project construction vehicles per day along off-site roadway segments would not be anticipated to

result in a doubling of traffic volumes necessary to increase noise levels by 3 dBA. Off-site project generated construction vehicle trips would result in a negligible noise level increase and would not result in a substantial increase in ambient noise levels. Impacts would be less than significant. No mitigation measures are required. The addition of project trips is not expected to change noise levels in excess of the applicable threshold at any of the study roadway segments.

Comment 16-5

The comment is concern about the project's lighting, paving, and stormwater runoff effect on the existing environment, namely groundwater, wildlife, and the natural character of the area.

Response to Comment 16-5

As stated in the Draft MND, the design and placement of light fixtures for the Proposed Project would be consistent with the Town Municipal Code standards for lighting (Municipal Code 9.70.020), as follows:

1. All lighting used in parking lots for security purposes or safety-related uses shall be scheduled so that light rays emitted by the fixture are projected below the imaginary horizontal plane passing through the lowest point of the fixture and in such a manner that the light is directed away from streets and adjoining properties.
2. If lighting is used or is necessary for color rendition, the primary lighting system shall be supplemented with a secondary lighting system which shall serve as security-level lighting and shall be the sole source of lighting during the nonoperating hours of each business.
3. Lighting standards and fixtures shall be of a design compatible with the architecture of onsite buildings.
4. Flashing lights are prohibited. The intensity of light at the boundary of any multi-family, commercial, or industrial zoning district shall not exceed seventy-five (75) foot lamberts from a source of reflected light.
5. Parking lot lighting and/or security lighting, when affixed to individual poles or affixed to any structure on site, shall not exceed a height of twenty (20) feet above the parking area surface.
6. Security or accent lighting for single-family residences shall be shielded to project downward or in a manner that the light is directed away from streets and adjoining properties.

The hours of operation are limited to 7:00 AM to 5:00 PM. Only security-level lights would be on between 5:00 PM and 7:00 AM. Furthermore, as the Proposed Project operational hours will be 7:00 AM until 5:00 PM, it will not violate nighttime noise standards (35 dBA Leq at residential uses). The Final IS/MND includes Mitigation Measures BIO-1 to BIO-3 ensure no significant impacts to wildlife occur.

The Proposed Project would be subject to the National Pollutant Discharge Elimination System (NPDES) permit which requires a Water Quality Management Plan (WQMP). The WQMP includes mandatory compliance of BMPs as well as compliance with NPDES Permit requirements. Refer to Section 4 of Draft MND Appendix K for project BMPs. As stated in the Draft MND, the WQMP identifies an infiltration basin to capture and treat all storm flows generated on the Project Site to prevent degradation of surface and groundwater quality. Review and approval of the WQMP by the Town of Apple Valley is required and would ensure that all potential pollutants of concern are minimized or otherwise appropriately treated prior to being discharged from the Project Site. As

stated in page 56 of the Final IS/MND, the Project Site has one drainage area (DA-1) with a design capture volume (DCV) of 15,744 CF. There will be an infiltration basin on the east side of the site, with drainage reaching the basin through curb cuts along the landscaped perimeter. The infiltration basin retention volume is 15,744 CF, achieving 100% retention of the DA-1 DCV. The stormwater infiltration basin would treat runoff by removing pollutants and allowing it to seep into the ground.

Comment 16-6

This comment is in regard to the project's impact on quality of life, property value, community character, and location of project adjacent to a residential community.

Response to Comment 16-6

The currently vacant Project Site is designated in the General Plan as Planned Industrial (I-P) and has a zoning of Planned Industrial. The I-P land use designation allows high quality, non-polluting industrial land uses, either as free-standing uses or as part of master planned industrial parks. Uses permitted include warehousing, light manufacturing, research and development and administrative facilities. The I-P zoning district is intended to provide for light industrial uses, research and development, and multi-tenant industrial buildings, as well as certain supporting administrative and professional offices and commercial activities on a limited basis in an attractive and pleasant working environment.

This district implements the Planned Industrial (I-P) designation of the General Plan. The Proposed Project is the development of a truck and trailer parking facility and would be subject to the development standards required for uses within the I-P zoning district. Subject to a CUP, the Proposed Project is an allowable use under the I-P zoning district.

The Proposed Project includes 150,844 square-feet of perimeter landscape. A 26.24-foot linear landscape area comprised of shrubs proposed is proposed between the eastern wall and the eastern project boundary. With the inclusion of the 6-foot-wall and the landscape buffer, the light exposure, noise pollution, and visual impacts posed by the Proposed Project would be significantly minimized." Property value is not an impact analyzed under CEQA.

Comment 16-7

The comment asserts that the project would require a full EIR, given the findings presented.

Response to Comment 16-7

Per CEQA Public Resources Code 15074, "the decision-making body of the lead agency shall consider the proposed negative declaration or mitigated negative declaration together with any comments received during the public review process. The decision-making body shall adopt the proposed negative declaration or mitigated negative declaration only if it finds on the basis of the whole record before it (including the initial study and any comments received), that there is no substantial evidence that the project will have a significant effect on the environment and that the negative declaration or mitigated negative declaration reflects the lead agency's independent judgment and analysis."

As concluded in the Draft MND, with implementation of identified mitigation measures, the Proposed Project would not result in significant unavoidable environmental impacts. The Town asserts that the Proposed Project would not require a full EIR.

Comment 16-8

This comment is a summary of the requested actions: 1) reject the MND, 2) require an EIR, and 3) identify an alternative site.

Response to Comment 16-8

See Responses to Comments 16-3 through 16-8.

The currently vacant Project Site is designated in the General Plan as Planned Industrial (I-P) and has a zoning of Planned Industrial. The I-P land use designation allows high quality, non-polluting industrial land uses, either as free-standing uses or as part of master planned industrial parks. Uses permitted include warehousing, light manufacturing, research and development and administrative facilities. The I-P zoning district is intended to provide for light industrial uses, research and development, and multi-tenant industrial buildings, as well as certain supporting administrative and professional offices and commercial activities on a limited basis in an attractive and pleasant working environment.

Comment 16-9

The comment is a statement of Apple Valley residents deserving “transparent, data-driven decision-making that protects our health, safety, and community integrity.” Also requested is including the letter into the public record as a formal opposition.

Response to Comment 16-9

Comment noted.

Comment 16-10

The comment is a closing statement thanking the Town for time and consideration.

Response to Comment 16-10

Comment noted.

Comment Letter 17 – Email from Michael Aasand Dated October 29, 2025

Comment 17-1

Commenter's opposition for the project being located next to single family homes is stated. Commenter notes that there are better alternative locations.

Response to Comment 17-1

The comment does not raise any specific environmental issues or questions related to the adequacy of the Draft MND.

The currently vacant Project Site is designated in the General Plan as Planned Industrial (I-P) and has a zoning of Planned Industrial. The I-P land use designation allows high quality, non-polluting industrial land uses, either as free-standing uses or as part of master planned industrial parks. Uses permitted include warehousing, light manufacturing, research and development and administrative facilities. The I-P zoning district is intended to provide for light industrial uses, research and development, and multi-tenant industrial buildings, as well as certain supporting administrative and professional offices and commercial activities on a limited basis in an attractive and pleasant working environment.

Comment Letter 18 – Email from Bonnie Fraterrigo Dated November 14, 2025

Comment 18-1

This comment is an introduction expressing opposition to the project due to risks to safety, health, and quality of life.

Response to Comment 18-1

The comment does not raise any specific environmental issues or questions related to the adequacy of the Draft MND, and no further response is required.

Comment 18-2

The comment claims that the roads in the area are not designed to handle heavy industrial traffic. The roads are narrow, lack shoulders, and are already in poor condition.

Response to Comment 18-2

As stated in the Traffic Impact Analysis (TIA), projects within a 1.5-mile radius of the project site are included in the cumulative analysis. Trips generated by other pending or approved but unconstructed developments in the Town were reviewed and added to future volume forecasts. See Table 3 of TIA. The planned Dale Evans Parkway at Waalew Road Realignment project includes realigning Dale Evans Parkway on the north leg to align with Dale Evans Parkway on the south leg, installing traffic signals and improving pedestrian crossing. This project is funded and has a preliminary schedule for construction with completion in 2027. Moreover, the proposed project shall contribute towards the Town of Apple Valley General Plan Circulation Element Program 1.A.4, Development Impact Fee program (Municipal Code Chapter 3.28) and regional transportation development mitigation fee program (County of San Bernardino Measure I). The Development Impact Fee provides a funding mechanism for arterial streets, traffic signals, interchange improvements as well as emergency services. The purpose of such fees is to minimize, to the greatest extent practicable, the impact that new development has on the Town's public services and public facilities. A fair share analysis was prepared to identify the share of project trips contributed to substantially impacted locations for which improvements are identified that may not be currently included in the Town's Development Impact Fee program. To the extent that any of the identified improvements are not included in the Town's Development Impact Fee program, the project would contribute towards those improvements on a fair share basis. The project fair share is based on the proportion of project peak hour trips contributed to the improvement location relative to the total new peak hour traffic volume.

In addition, vehicle stacking at the proposed gated access points was evaluated in the TIA to ensure adequate on-site vehicle storage length allows vehicles a place to wait for the gate to open without blocking the public right-of-way. Based on the inbound volume, the forecast queue length of 75 feet (approximately one truck or three cars) and the storage capacity of 135 feet, the gates have sufficient storage to accommodate the forecast queue length.

Comment 18-3

The comment asserts that the large trucks present a safety risk to school-aged children.

Response to Comment 18-3

As shown in the Traffic Impact Analysis, the project inbound and outbound distribution would occur on roads identified as truck routes. Phoenix Academy is the nearest school to the Project Site. It is located approximately 1.9 miles southwest of the Project Site. Therefore, a significant number

of children are not anticipated to be in proximity of the Proposed Project. Also refer to Response to Comment 18-2.

Comment 18-4

This comment notes that the increase in traffic would result in higher levels of noise, air pollution, and emissions, which are incompatible with a rural, residential environment.

Response to Comment 18-4

A Noise Impact Analysis was prepared for the Proposed Project January 2, 2025 and revised on August 26, 2026 and is included in the Final IS/MND as Appendix L. The Noise Impact Analysis concluded:

Exterior Noise Impacts: Project exterior operational noise levels at residential zoned property lines are expected to range between 46 and 48 dBA Leq. therefore, the project will not exceed Town-established daytime exterior adjusted stationary noise standards. Further, project operational hours will be 7:00 AM until 5:00 PM and therefore will not violate nighttime noise standards. This impact is less than significant.

Interior Noise Impacts: Typical residential construction provides approximately 20 dB of exterior to interior noise reduction with windows closed and approximately 15 dB of reduction with windows open. Project operational noise will not cause daytime interior noise levels to exceed the Town's interior noise standard of 45 dBA Leq at nearby residential land uses. Project operational hours are 7:00 AM to 5:00 PM. Therefore, nighttime interior noise standards will not be exceeded.

Operational Noise Impacts – Offsite Vehicle Trips: A Noise Impact Analysis was prepared for the Proposed Project and is included as Appendix L to the Final IS/MND. Per the Town, a project traffic induced noise increase of 3 dBA or greater may be considered to be significant. The addition of project construction vehicles per day along off-site roadway segments would not be anticipated to result in a doubling of traffic volumes necessary to increase noise levels by 3 dBA. Off-site project generated construction vehicle trips would result in a negligible noise level increase and would not result in a substantial increase in ambient noise levels. Impacts would be less than significant. No mitigation measures are required. The addition of project trips is not expected to change noise levels in excess of the applicable threshold at any of the study roadway segments.

A Health Risk Assessment (HRA) was prepared for the Proposed Project and included in the Draft MND as Appendix D. The HRA concludes that the 30.25-year, cumulative carcinogenic health risk to an individual born during the opening year of the Proposed Project and living in the project vicinity for the entire cumulative risk duration, is maximum of 9.76 in a million. The EPA-established threshold is 10 in a million to be considered significant.). Therefore, as the maximum incremental cancer risk (MICR) does not exceed 10 in a million at the closest sensitive receptor locations in the project vicinity, no sensitive receptors would experience a significant impact due to the cancer risk from diesel emissions created by the Proposed Project. Using the maximum diesel particulate matter concentration from opening year (2026) emissions, the resulting Hazard Index is 0.0023 (see Appendix D of the Draft MND). The criterion for significance is a Hazard Index increase of 1.0 or greater. Therefore, the on-going operations of the Proposed Project would result in a less than significant impact due to the non-cancer risk from diesel emissions created by the Proposed Project. The on-going operations of the Proposed Project would result in a less than significant impact due to the non-cancer risk from diesel emissions created by the Proposed Project.

Comment 18-5

This comment expresses concern about the decrease in property values and the project's potential to deter future residential growth.

Response to Comment 18-5

Property value is not an impact required to be analyzed by CEQA Guidelines. The currently vacant Project Site is designated in the General Plan as Planned Industrial (I-P) and has a zoning of Planned Industrial. The I-P land use designation allows high quality, non-polluting industrial land uses, either as free-standing uses or as part of master planned industrial parks. Uses permitted include warehousing, light manufacturing, research and development and administrative facilities. The I-P zoning district is intended to provide for light industrial uses, research and development, and multi-tenant industrial buildings, as well as certain supporting administrative and professional offices and commercial activities on a limited basis in an attractive and pleasant working environment. This district implements the Planned Industrial (I-P) designation of the General Plan. The Proposed Project is the development of a truck and trailer parking facility and would be subject to the development standards required for uses within the I-P zoning district. Subject to a CUP, the Proposed Project is an allowable use under the I-P zoning district.

Comment 18-6

The comment is a request to the Planning Commission to deny the project and to prioritize the safety, well-being, and long-term interests of the residents.

Response to Comment 18-6

Comment noted.

Comment 18-7

The comment is appreciation for consideration of the matter.

Response to Comment 18-7

Comment noted.

Comment Letter 19 – Affidavit of Petition Circulator

This is an Affidavit of Petition Circulator, Elaine Lauro regarding public opposition to the proposed project. The petition is signed by 68 individuals.