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November 5, 2024

VIA EMAIL AND U.S. MAIL

Daniel Alcayaga, AICP, Planning Manager
Town of Apple Valley
14955 Dale Evans Parkway
Apple Valley, CA 92307

Email: dalcayaga@applevalley.org;
planning@applevalley.org

La Vonda M. Pearson, Town Clerk
Town of Apple Valley
14955 Dale Evans Pkwy
Apple Valley, CA 92307

Email: townclerk@applevalley.org

VIA EMAIL ONLY

Richard Hirsch, Contract Planner
Email: rhirsch@interwestgrp.com

Public Records Act Coordinator
Email: records@applevalley.org

**Re: Request for Immediate Access to Public Records – Cordova
Business Center Development Project (SCH No. 2024100839;
Project No. SPR 2023-006)**

Dear Mr. Alcayaga, Ms. Pearson, Mr. Hirsch, and Public Records Act Coordinator:

We are writing on behalf of **Californians Allied for a Responsible Economy (“CARE CA”)** to request ***immediate access*** to any and all public records referring or related to the Cordova Business Center Development Project (SCH No. 2024100839; Project No. SPR 2023-006), proposed by Cordova Business Center LLC (“Applicant”). This request includes, but is not limited to, any and all file materials, applications, correspondence, resolutions, memos, notes, analysis, email messages, files, maps, charts, and any other documents related to the Project. ***This request does not include the Subsequent MND (“SMND”) or documents referenced or relied upon in the SMND, which we have requested in a separate letter pursuant to the California Environmental Quality Act.***

The Project proposes to construct a 504,508 square foot industrial warehouse and distribution center on one parcel (Assessor Parcel Number 0463-491-0000) consisting of approximately 30 acres located within the North Apple Valley Industrial Specific Plan area on the southwest corner of Cordova and Central Roads, in the Town of Apple Valley, County of San Bernardino, California.

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This request is made pursuant to the California Public Records Act (Government Code §§ 7920.000, et seq.). This request is also made pursuant to Article I, section 3(b) of the California Constitution, which provides a Constitutional right of access to information concerning the conduct of government. Article I, section 3(b) provides that any statutory right to information shall be broadly construed to provide the greatest access to government information and further requires that any statute that limits the right of access to information shall be narrowly construed.

We request ***immediate access*** to review the above documents pursuant to section 7922.525 of the Public Records Act, which requires public records to be “open to inspection at all times during the office hours of a state or local agency” and provides that “every person has a right to inspect any public record.” Therefore, the 10-day response period applicable to a “request for a copy of records” under Section 7922.535(a) does not apply to this request.

We request access to the above records in their original form, as maintained by the agency. Pursuant to Government Code Section 7922.570, if the requested documents are in electronic format, please upload them to a file hosting program such as Dropbox, NextRequest or a similar program. Alternatively, if the electronic documents are 10 MB or less (or can be easily broken into sections of 10 MB or less), they may be emailed to me as attachments.

We will pay for any direct costs of duplication associated with filling this request up to \$200. However, please contact me at (650) 589-1660 with a cost estimate before copying/scanning the materials.

Please use the following contact information for all correspondence:

U.S. Mail

Sheila M. Sannadan
Adams Broadwell Joseph & Cardozo
601 Gateway Boulevard, Suite 1000
South San Francisco, CA 94080-7037

Email

ssannadan@adamsbroadwell.com

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If you have any questions, please call me at (650) 589-1660 or email me at ssannadan@adamsbroadwell.com. Thank you for your assistance with this matter.

Sincerely,



Sheila M. Sannadan
Legal Assistant

SMS:acp

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VIA EMAIL AND U.S. MAIL

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14955 Dale Evans Pkwy
Apple Valley, CA 92307

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VIA EMAIL ONLY

Richard Hirsch, Contract Planner

Email: rhirsch@interwestgrp.com

**Re: Request for Immediate Access to Documents Referenced in the
Subsequent MND – Cordova Business Center Development Project
(SCH No. 2024100839; Project No. SPR 2023-006)**

Dear Mr. Alcayaga, Ms. Pearson, and Mr. Hirsch:

We are writing on behalf of Californians Allied for a Responsible Economy (“CARE CA”) to request ***immediate access*** to any and all documents referenced, incorporated by reference, and relied upon in the Subsequent Mitigated Negative Declaration (“SMND”) prepared for the Cordova Business Center Development Project (SCH No. 2024100839; Project No. SPR 2023-006), proposed by Cordova Business Center LLC (“Applicant”). *This request excludes a copy of the SMND. This request also excludes any documents that are currently available on the Town of Apple Valley website, as of today’s date.*¹

The Project proposes to construct a 504,508 square foot industrial warehouse and distribution center on one parcel (Assessor Parcel Number 0463-491-0000) consisting of approximately 30 acres located within the North Apple Valley Industrial Specific Plan area on the southwest corner of Cordova and Central Roads, in the Town of Apple Valley, County of San Bernardino, California.

¹ Accessed <https://www.applevalley.org/services/planning-division/environmental> on November 5, 2024.

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Our request for **immediate access** to all documents referenced in the SMND is made pursuant to the California Environmental Quality Act (“CEQA”), which requires that all documents referenced, incorporated by reference, and relied upon in an environmental review document be made available to the public for the entire comment period.²

Please use the following contact information for all correspondence:

U.S. Mail

Sheila M. Sannadan
Adams Broadwell Joseph & Cardozo
601 Gateway Boulevard, Suite 1000
South San Francisco, CA 94080-7037

Email

ssannadan@adamsbroadwell.com

If you have any questions, please call me at (650) 589-1660 or email me at ssannadan@adamsbroadwell.com. Thank you for your assistance with this matter.

Sincerely,



Sheila M. Sannadan
Legal Assistant

SMS:acp

² See Public Resources Code § 21092(b)(1) (stating that “all documents referenced in the draft environmental impact report or negative declaration” shall be made “available for review”); 14 Cal. Code Reg. § 15072(g)(4) (stating that all documents incorporated by reference in the MND . . . “shall be readily accessible to the public”).