



## Interoffice Memo

**DATE:** August 6, 2026

**PHONE:** 909-387-4110

**FROM:** **OLIVER MUJICA**, PLANNER  
LAND USE SERVICES DEPARTMENT

**TO:** **HONORABLE PLANNING COMMISSION**

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**SUBJECT:** AGENDA ITEM #2 - PROJ-2021-00063/ AVELLANA PROPERTIES, INC./DAVID WEISMAN  
ENTITLEMENT STRATEGIES GROUP, INC./TOBY WAXMAN

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Since the distribution of the staff report, Staff has received additional comments for the above-referenced Project. These additional comments are attached for your consideration.

## Mujica, Oliver

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**From:** pauline durheim <durheimp@gmail.com>  
**Sent:** Tuesday, August 4, 2026 2:21 PM  
**To:** Mujica, Oliver  
**Subject:** Project #: Proj-2021-00063 APN #:435-015-13

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**CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you can confirm the sender and know the content is safe.**

Our concern is how this proposed complex is going to affect the area.

324 proposed mobile homes with a minimum of 324 more drivers on Bear Valley Road within a 5 mile radius of 2 high schools and many family neighborhoods.

Bear Valley Road and Hwy 18 are also main arteries for travelers to get to Big Bear, Palm Springs and the Colorado River.

The other concern is the quantity of commercial trucks hauling critical equipment to and from the mines in the area, along with a significant number of other commercial trucks from out of the local area.

The corner of Bear Valley Road and Hwy 18 has a high number of traffic accidents and near misses. The increase in local traffic will increase the chance of more accidents, with 324 residences and the employees it will take to run the proposed facility, convenience store, urgent care, etc.

And as a resident living on Las Piedras Road for nearly 20 years, I am concerned about the water required to supply this facility and how that will affect nearby water table levels, as we have our own well.

Noise levels will be a concern with so many more people living in such a small area.

We are also very concerned about the wildlife as right now we have Red-tailed Hawks, Road Runners and Long-eared Jack Rabbits.

The construction and disturbance of this proposed project will disrupt the wildlife significantly.

Sincerely,

Pauline Durheim

24777 Las Piedras Road, AppOur concern is how this proposed complex is going to affect the area.

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Sincerely,  
Pauline Durheim  
24777 Las Piedras Road, Apple Valley, Ca 92308  
760-486-7609

# **Executive Summary of Key Concerns**

## **Proposed Avellana Senior Mobile Home Community Project No. PROJ-2021-00063**

We respectfully request that the Planning Commission carefully evaluate the following concerns before considering approval of the proposed project:

### **1. Wastewater Treatment Facility**

- Proposed wastewater treatment facility located on a separate five-acre parcel between existing rural residences.
- Questions remain regarding odor, noise, long-term maintenance, emergency backup systems, groundwater protection, and potential impacts on neighboring properties.

### **2. Groundwater Resources**

- The surrounding community depends entirely on private wells.
- The County should demonstrate that sufficient groundwater exists to serve the project without affecting existing wells and that groundwater quality will be protected.

### **3. Transportation and Emergency Access**

- Existing rural roads, including Las Piedras Road and Laguna Seca Road, are inadequate to support a development of this size.
- Flooding regularly affects access routes during storm events.
- Bear Valley Road is a heavily traveled truck route with no dedicated turn lanes serving the proposed development, creating additional traffic and safety concerns.

### **4. Fire Protection and Emergency Medical Services**

- The project would substantially increase demand for fire protection and emergency medical services.
- The nearest known fire hydrant is approximately three miles from the project site.
- The County should demonstrate that adequate emergency response, firefighting water supply, access routes, and public safety resources are available.

### **5. Consistency with the Rural Living Designation**

- The project is proposed on land designated Rural Living and zoned RL-5.
- The Planning Commission should carefully evaluate whether a 399-unit senior mobile home community is consistent with the intent of this low-density rural land use designation.

### **6. Long-Term Operation of the Age-Restricted Community**

- The County should identify how age restrictions and occupancy requirements will be monitored and enforced throughout the life of the project.

## **7. Cumulative Environmental Impacts**

- The County should evaluate whether approval of this project could contribute to additional high-density development in the area and the resulting cumulative impacts on roads, groundwater resources, public services, emergency services, and rural infrastructure.

## **8. Noise, Lighting, and Quality of Life**

- The project would introduce substantially more traffic, lighting, noise, and activity into an established rural neighborhood.
- Appropriate mitigation measures should be identified to protect nearby residents and preserve the rural character of the surrounding community.

We respectfully request that these concerns be fully addressed through the California Environmental Quality Act (CEQA) review process. If the County cannot demonstrate that these significant impacts have been adequately analyzed and mitigated in accordance with CEQA, we respectfully request that the Planning Commission deny approval of the proposed project.

Thank you for your thoughtful consideration.

Dear Members of the San Bernardino County Planning Commission

Regarding: Proposed Avellana Senior Mobile Home Community Project NO. PROJ-2021-00063.

Concerns:

**Wastewater Treatment Facility**

**Groundwater Resources**

**Transportation and Emergency Access**

**Fire Protection and Emergency Services**

We are a current residents of Las Piedras Road, where we have resided for many years. We are writing about the Proposed Avellana Senior Mobile Home Community.

Due to the Initial Study/Mitigated Negative Declaration (IS/MND), we are respectfully asking

- you to either deny or at a minimum, require significant revision. We believe that the study does not adequately address serious issues, as well as environmental safety concerns as required under the California Environmental Quality Act (CEQA).

While we understand and recognize the need for senior housing, this project is proposed in a rural area that lacks the necessary infrastructure needed to safely support a development of this size.

This project raises substantial concerns about wastewater treatment, water supply, emergency response, fire protection, traffic, a potential emergency evacuation route as well as the cumulative impacts to existing rural residents. These issues deserve a more extensive and thorough environmental analysis before considering the approval of this project.

The following comments show the most significant concerns that we respectfully ask the Planning Commission to consider before taking any action on the project.

1. Inadequate Road Infrastructure and Emergency Access.

The existing road system is not adequately designed to accommodate the development of the proposed Senior Housing project.

Las Piedras Road is an unmaintained dirt road that serves the homes found behind the proposed project. During storms, Las Piedras Road floods and accumulates large bodies (ponds) of water. Laguna Seca Road (also a dirt road), is maintained by the County.

During storms, these roads have become impassable due to rushing water and mud. Flood warning signs are routinely placed along Hwy 18 where flooding crosses the roadway. The only access from Las Piedras Road to Hwy 18, is Laguna Seca Road. This creates serious concerns about emergency response, evacuation, as well as daily access during storm events. The surrounding road system is not designed to support a development of this size. Bear Valley Road is a heavily traveled, two-lane truck route with no dedicated turn lanes. There are no proposed dedicated turn lanes serving the entrance to this senior housing project.

Nearby is the Bear Valley Road/Hwy 18 ("Bear Valley Split"), intersection that already experiences heavy traffic and has a history of serious accidents. In addition, there are no traffic signals in the immediate area to safely control vehicle movements. I truly

believe that the lack of traffic signals will create a significant safety hazard for seniors and others while trying to access Hwy 18 and Bear Valley Road, particularly when making left turns and crossing oncoming traffic that often travels at high rates of speed.

Prior to approving this project, the County should show that the existing transportation infrastructure can safely and adequately accommodate the increase in traffic while supporting reliable emergency access for both existing residents and future occupants.

## **2. Incompatible Location of the Sewage-Treatment Facility.**

The project proposes placement of a sewage treatment facility, solar equipment and a future residence for maintenance employees. All of this, proposed on a separate five-acre parcel along Las Piedras Road, located between two existing homes.

This is an inappropriate location for infrastructure serving an approximately 800-resident development. The County should show detailed studies on odors, noise, lighting, equipment failures, emergency backup systems, groundwater protection and the long-term operation and maintenance of such facility.

Until which time the county proves that this facility will not adversely affect nearby residents, private wells or surrounding properties, no approval should be granted.

## **3. Uncertain Water and Groundwater Impacts.**

- Residents in this rural area depend on private wells as there is no public water system available. A development to house approximately 800 residents places a significantly higher demand on the local groundwater supply.

The wastewater treatment facility also raises concerns about the possible contamination of nearby wells if leakage, overflow, equipment failure and or improper maintenance occurs.

Prior to approving this project, the County should need independent evidence that sufficient groundwater will be available without reducing the quantity and quality of water available to existing residents. The County should also require permanent groundwater monitoring, clearly defined emergency procedures and financial guarantees covering any damage to neighboring wells.

## **4. Fire Protection and Emergency services.**

The proposed project would substantially increase the demand for fire and emergency medical services. The nearest known fire hydrant is approximately 3 miles from the proposed project site.

The County should be able to show that adequate emergency response, firefighting equipment and water supply as well as public resources in case of an emergency are made available.

## **5. Consistency with the Rural Living Land Use Designation.**

The proposed project is located on property designated Rural Living and zoned RL-5 an area characterized by large residential parcels, open space, private wells, septic systems, propane service and rural roads. The only public utility available in this area is electricity. Existing development patterns reflect a very low-density rural environment where each resident is self-sufficient for water, wastewater disposal, energy needs.

The proposed 399 Unit Senior mobile home community would introduce approximately 800 residents along with a private wastewater facility, community amenities, internal roadways and associated infrastructure. While the applicant is seeking approval through the Planned Development Process, the scale and intensity of this development appear to be substantially different from the surrounding Rural Living Environment.

The Planning Commission should carefully evaluate whether this project is consistent with the intent and purpose of the Rural Living land use designation and whether the resulting impacts on infrastructure, public services, traffic, groundwater resources and the surrounding community have been fully evaluated under the California Environmental Quality Act (CEQA).

If the project's significant impact cannot be adequately mitigated, the Commission should carefully consider whether this location is appropriate for a development of this magnitude.

- 6. Long-Term Management and Enforcement of the Age-Restricted Community;** The proposed development is described as a senior mobile home community intended for residents meeting age-restriction requirements. However, it is unclear how these restrictions will be enforced and monitored over the long term.

The Planning Commission should ensure that legally enforceable mechanisms are in place to maintain the projects intended use throughout its lifetime. Questions remain regarding who will verify resident eligibility, how requirements will be monitored, and what measure will be taken if the property changes ownership or management in the future.

Because this project is being evaluated, in part, based on its intended use as senior housing, the County should clearly identify the long-term management, oversight, and enforcement provisions that will ensure the development continues to operate as proposed.

- 7. Cumulative Impact and Precedents for Future Development.**

The proposed Avellana Senior Mobile Home Community should not be evaluated in isolation. Under the California Environmental Quality Act (CEQA) the County must also consider the projects' cumulative impacts in combination of existing conditions and reasonably near future development.

Approving a high-density residential community on land designated for Rural Living could establish a precedent for similar development proposals in the surrounding area. As additional projects are proposed, cumulative demands on groundwater resources, rural roads, emergency services, added traffic, wastewater infrastructure and public



safety could increase significantly.

The Planning Commission should ensure that the environmental review fully evaluates not only the direct impacts of this project, but also its cumulative effects and whether approval of this development could contribute to incremental changes that are inconsistent with the long-term goals for this rural community.

Before approving this project, the County should demonstrate that these cumulative impacts have been thoroughly analyzed and the appropriate mitigation measures have been identified where required under the CEQA.

#### **8. Noise, Lighting and Quality of Life Impact on Existing Residents.**

The area surrounding the project is a quiet rural community. This community consists of large residential parcels with extremely limited development. Existing residents chose to live in this area with the expectation of a low-density rural environment consisting of minimal traffic, limited nighttime lighting and relatively low levels of noise and activity.

The proposed 399 Unit Senior Mobile Home Community would substantially increase vehicle traffic, outdoor lighting, maintenance, activities, deliveries and daily community operations. Residents living immediately adjacent to the project may experience increased noise, light intrusion and other operational impacts that could significantly alter the quiet rural character of the surrounding neighborhood.

Under the California Environmental Quality Act (CEQA), the County should ensure that these potential impacts are thoroughly evaluated and that appropriate mitigation measures-including lighting controls, landscape buffering, noise-reduction measures and operational limitations where appropriate-are considered before this project is approved.

#### **Conclusion**

Thank you for taking the time to consider our comments regarding the proposed Avellana Senior Mobile Home Community.

As outlined above, we believe the proposed project raises significant concerns regarding wastewater treatment, groundwater resources, transportation and emergency access, fire protection, public safety, consistency with the Rural Living land use designation, long-term project management, cumulative environmental

impacts, and the quality of life of existing residents. These issues deserve careful consideration because they affect not only the future residents of this development, but also the families who already call this rural community home.

We respectfully request that these comments be included in the official project record and fully considered as part of the California Environmental Quality Act (CEQA) review process, including the Environmental Impact Report (EIR) and the County's Response to Comments.

If the County cannot demonstrate that these significant impacts have been adequately analyzed and mitigated in accordance with CEQA, we respectfully request that the Planning Commission deny approval of the proposed project.

Thank you for your time, your service to our community, and your careful consideration of these concerns.

Respectfully,

Lynn and Rex Staten

Las Piedras Road Resident

Mailing address:

PO Box 1804

Apple Valley, CA 92307