



Stowell Road Package Delivery Warehouse

Final Environmental Impact Report

State Clearinghouse No. 2025080640

prepared by

City of Santa Maria

Planning Division, Community Development Department
110 South Pine Street, Suite 101
Santa Maria, California 93454
Contact: Cody Graybehl, Senior Planner

prepared with the assistance of

Rincon Consultants, Inc.

1530 Monterey Street, Suite D
San Luis Obispo, California 93401

April 2026

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1 Introduction

On November 13, 2025, the City of Santa Maria (City) released for public review the Draft Environmental Impact Report (Draft EIR) for the Package Delivery Warehouse Planned Development Permit Project (hereinafter referred to as the project). The Draft EIR was prepared by the City in accordance with the requirements of the California Environmental Quality Act (CEQA) (Public Resources Code Sections 21000–21177) and the CEQA Guidelines (California Code of Regulations, Title 14, Division 6, Chapter 3, Sections 15000–15387). The City is serving as the lead agency under CEQA for consideration of certification of the EIR and has principal responsibility for deciding whether to approve the proposed project.

1.1 Public Review and Responses to Comments

In accordance with Sections 15087 and 15105 of the CEQA Guidelines, which require a minimum 45-day public review period for a Draft EIR, the Draft EIR was circulated for public review and comment to responsible agencies and interested parties as well as members of the public, for a period of 64 days (November 13, 2025 through January 16, 2025). Comment letters received on the Draft EIR and responses to each of the comments are provided in their entirety in Chapter 2, *Responses to Comments*.

CEQA requires a lead agency that has prepared a Draft EIR to consult with and obtain comments from responsible and trustee agencies that have jurisdiction by law with respect to the project, and to provide the public with an opportunity to comment on the Draft EIR (CEQA Guidelines Sections 15086 and 15087).

Sections 15088(a) and (c) of the CEQA Guidelines also require a lead agency to evaluate comments on environmental issues received from people who reviewed the Draft EIR and to prepare written responses to comments raising significant environmental issues. The Final EIR is the mechanism for responding to these comments. Responses are not required for comments regarding merits of the proposed project or regarding issues not related to the project's environmental impacts. Several of the comments on the Draft EIR state the commenter's concern regarding traffic, potential economic impacts, or provide general statements concerning the content of the Draft EIR. Detailed responses are not warranted or required by CEQA for comments that do not address the environmental issues related to the proposed project. Such instances are noted in the responses. The City will review all comments received, including those that do not warrant a response under CEQA, before considering certification of the Final EIR or approval of the proposed project.

Each comment has been reproduced with individual comments bracketed and numbered according to the type of commenter (agency, individual, and organization) with responses following each comment.

1.2 Revisions to the Draft EIR

Sections of the Draft EIR have been revised after the Draft EIR was circulated for public review (see Chapter 3, *Revisions to the Draft EIR*). None of the changes constitute "significant new information," which would require recirculation of the Draft EIR as described in Section 3.2, *Recirculation Not Warranted*. "Significant new information" is defined in Section 15088.5(a) of the CEQA Guidelines as follows:

- (1) A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented.
- (2) A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance.

- (3) A feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the environmental impacts of the project, but the project's proponents decline to adopt it.
- (4) The Draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded.

None of these circumstances has arisen from comments on the Draft EIR; therefore, recirculation is not required.

1.3 Final EIR

The Draft EIR, Final EIR, and associated appendices are available for review online at: <https://www.cityofsantamaria.org/services/departments/community-development/planning-division/planning-policies-and-regulations/environmental-impact-reports> and at the City of Santa Maria Community Development Department at 110 South Pine Street, Suite 101, Santa Maria, California 93454.

As required by CEQA Guidelines Section 15088(b), at least 10 days before consideration of the Final EIR for certification, the City provided a written response (electronic copy) to each public agency that submitted written comments on the Draft EIR.

1.4 Project Decision Process

This document and the Draft EIR, as amended through responses to comments, together constitute the Final EIR, which will be considered by the City prior to a decision on whether to approve the Project. If the City decides to approve the project, the City, as required by CEQA Guidelines Section 15090, must first certify that the Final EIR was completed in compliance with the requirements of CEQA, was reviewed and considered by the City, and reflects its independent judgment and analysis. The City would then be required to adopt findings of fact on the disposition of each significant environmental impact, as required by CEQA Guidelines Section 15091, and a statement of overriding considerations, as required by CEQA Guidelines Section 15093. A Mitigation Monitoring and Reporting Program, which is required by CEQA Guidelines Section 15091(d), has been included as part of Chapter 4, *Mitigation Monitoring and Reporting Program*, of this Final EIR and will be adopted by the City of Santa Maria Planning Commission in conjunction with any project approval.

2 Responses to Comments on the Draft EIR

This chapter of the Final EIR contains the comment letters received during the public review period for the Draft EIR, which started on November 13, 2025, and concluded on January 16, 2026. In conformance with Section 15088(a) of the California Environmental Quality Act (CEQA) Guidelines, written responses were prepared to address comments received on Project environmental issues during this review period.

2.1 Commenters on the Draft EIR

Table 2-1 presents the list of commenters, including the numerical designation for each comment letter received, the author of the comment letter, and the date of the comment letter. Comment letters have been ordered according to the type of commenter.

Table 2-1 List of Commenters

Letter/ Comment No.	Commenter	Date
Agencies		
A1	Santa Barbara County Flood Control District	December 4, 2025
A2	Santa Barbara County Air Pollution Control District	December 8, 2025
A3	Santa Maria-Bonita School District	December 18, 2025
A4	Santa Maria-Bonita School District	December 19, 2025
A5	California Department of Conservation Geologic Energy Management Division	December 19, 2025
A6	Santa Barbara County Air Pollution Control District	December 24, 2025
A7	Santa Maria-Bonita School District	December 29, 2025
A8	California Department of Transportation	December 29, 2025
Organizations		
O1	Adams Broadwell Joseph & Cardozo	December 15, 2025
O2	Grower-Shipper Association	December 15, 2025
O3	Blum, Collins & Ho LLP	December 23, 2025
O4	Golden State Environmental Justice Alliance	December 26, 2025
O5	Teamsters Joint Council 42	December 26, 2025
O6	Lozeau Drury LLP	January 6, 2026
O7	Somach Simmons & Dunn	January 15, 2026
O8	Advocates for the Environment	January 16, 2026
Individuals		
I1	Michael J. Diani	December 17, 2025
I2	Dr. Carol Karamitsos	December 18, 2025
I3	Carlos and Alicia Escobedo	December 19, 2025
I4	Victor Jesus	December 19, 2025
I5	Anonymous	December 19, 2025
I6	David Klein	December 20, 2025
I7	Johnathan Milder	December 23, 2025

Letter/ Comment No.	Commenter	Date
18	Peggy Brierton	December 29, 2025
19	Jose Alfredo Cardona Flores	January 20, 2026
110	Dr. Carol Karamitsos	January 29, 2026

The comment letters and responses follow. The comment letters are numbered sequentially and each separate issue raised by the commenter, if more than one, has been assigned a number. The responses to each comment identify first the number of the comment letter, and then the number assigned to each issue (Response A1.1, for example, indicates that the response is for the first issue raised in Comment Letter A1).



Letter A1

COUNTY EXECUTIVE OFFICE

Mona Miyasato, County Executive Officer
Tanja Heitman, Assistant County Executive Officer
Wade Horton, Assistant County Executive Officer

December 23, 2025

Attn: Cody Graybehl, Senior Planner
Planning Division, Community Development Department
City of Santa Maria
110 South Pine Street, Suite 101
Santa Maria, California 93454

Email: cgraybehl@cityofsantamaria.org

Re: Stowell Road Package Delivery Warehouse Draft Environmental Impact Report

Dear Mr. Graybehl:

Thank you for the opportunity to review and comment on the City of Santa Maria's Stowell Road Package Delivery Warehouse Project Draft Environmental Impact Report (EIR). At this time, the County submits comments from the Santa Barbara County Flood Control District.

If you should have any questions, please do not hesitate to contact my office directly or Lisa Plowman, Planning and Development Director at (805) 568-2086.

Sincerely,

Brittany Odermann,
Deputy CEO

cc: Lisa Plowman, Director, Planning and Development Department
Zoe Carlson, Senior Planner, Planning and Development Department
Hannah Thomas, Senior Planner, Planning and Development Department
Matt Griffin, Flood Control District Engineering Manager, Flood Control District

Enclosure: Santa Barbara County Flood Control District Letter, dated December 4, 2025





Santa Barbara County Flood Control and Water Conservation District

130 E. Victoria Street, Suite 200, Santa Barbara, CA 93101

PH (805) 568-3440 FAX (805) 568-3434

<https://www.countyofsb.org/2155/Flood-Control>

CHRIS SNEDDON
Public Works Director

WALTER RUBALCAVA
Flood Control Deputy Director

December 4, 2025

RE: Release of Draft EIR for Package Delivery Warehouse Planned Development Permit in City of Santa Maria
LOCATION: 117-820-012 and 117-820-013 | 1680 West Stowell Road
MEMO TO: Hannah Thomas – Planning and Development Department
FROM: Matt Griffin – Flood Control District Engineering Manager

Thank you for the opportunity to comment on the Draft EIR for a large proposed commercial development in the City of Santa Maria. The Santa Barbara County Flood Control District (District) has reviewed the Draft EIR for the subject project and offers the following comments and recommendations:

A1.1

1. The project site is located on West Stowell Rd in the City of Santa Maria on two parcels totaling approximately 33 acres in size. This property is unimproved and has historically been in agricultural use. There are no structures on the site.

A1.2

2. Commercial development on the parcel will *rapidly increase and accelerate* runoff from the site. The site is located well west of the majority of the City and beyond any drainage or flood control improvements downstream. As such the project has the potential to *significantly* impact downstream properties and roadways.

3. The Flood Control District’s Standard Conditions of Project Plan Approval includes implementation of detention basins that would collect all onsite flows and release these flows at a rate of not to exceed 0.07 cubic feet per second (cfs) per acre of development. See Attachment 1, Flood Control Standard Conditions.

A1.3

4. Alternatively, considerations for development on the western edge of the City included potentially collecting all stormwater from the development to be conveyed to the Santa Maria River. It is recognized this may be a challenge due to the distance to the river and lack of public right of way.

A1.4

Recommendations:

The Santa Barbara County Flood Control District works closely with the City of Santa Maria to mitigate impacts associated with new development on downstream properties. As such, and as is standard in the Santa Maria Valley, including incorporated and unincorporated areas, the District recommends detention basins to mitigate the increased runoff from the project site pursuant to District Standard Conditions of Approval (attached) which require detention basins to mitigate runoff in the post development condition to no more than 0.07 cfs per acre of development.

A1.5

Thank you again for the opportunity to comment on this project.

Sincerely,

RE: Release of Draft EIR for Package Delivery Warehouse Planned Development Permit in
City of Santa Maria
LOCATION: 117-820-012 and 117-820-013 | 1680 West Stowell Road
December 4, 2025
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SANTA BARBARA COUNTY FLOOD CONTROL & WATER CONSERVATION DISTRICT

By: *Matt Griffin*
Matt Griffin
Flood Control District Engineering Manager
mgriff@countyofsb.org

Attachments:
Santa Barbara County Flood Control and Water Conservation District Standard Conditions of Project Plan Approval

SANTA BARBARA COUNTY FLOOD CONTROL AND WATER CONSERVATION DISTRICT

STANDARD CONDITIONS OF PROJECT PLAN APPROVAL

The following Standard Conditions list standards that apply to new development projects that fall under the Flood Control District's authority to review. It is neither intended as, nor does it establish, a legal standard for these functions. Special situations may call for variation from these conditions, subject to Flood Control District approval, or such other approval as may be specifically provided for. These Standard Conditions, as well as earlier versions, do not apply and have not applied to existing facilities, nor are they intended to imply that existing facilities need any improvements, unless the Flood Control District requires such improvements through development project approval.

General

1. All developments shall comply with all applicable requirements of the most current: (County codes may be viewed online at <http://bpc.iserver.net/codes/stbarb/>)
 - Santa Barbara County's Floodplain Management Ordinance (Santa Barbara County Code (SBCC) Chapter 15A, "Floodplain Management");
 - Santa Barbara County's Setback Ordinance (SBCC Chapter 15B, "Development Along Watercourses"); and
 - SBCC Chapter 24, "Offenses, Miscellaneous," Section 24-7, "Watercourses - Erecting buildings, etc., which obstruct flow prohibited."
2. The applicant shall provide a site plan of the proposed development showing the limits of the special flood hazard areas and base flood elevations as they appear on the most current Federal Emergency Management Agency (FEMA) flood insurance rate map (FIRM). Flood maps may be viewed online at <http://msc.fema.gov/>
3. The applicant shall provide a site plan of the proposed development showing the top of bank along those parts of a watercourse which are included within the areas of special flood hazard shown in the flood insurance rate maps and along those parts of a watercourse which lie between areas of special flood hazard on the same watercourse.
4. New development shall mitigate for increased runoff by directing drainage to an acceptable watercourse, improving downstream facilities, mitigating the increased runoff on-site, and/or as otherwise required by the Public Works Director. Runoff shall be conveyed safely to prevent erosion from slopes and/or channels. Natural drainage systems shall be utilized to the maximum extent practical. Disturbed slopes shall be vegetated with appropriate native or drought tolerant vegetation, permanent channel crossings shall be stabilized, and energy dissipaters such as riprap will be used at outlets of new storm drains, culverts, conduits or channels that enter unlined channels to minimize erosion potential.

5. Improvements may be required to intercept and convey off-site and on-site runoff through the project site to a District approved water course or drainage facility.
 6. Development located within the limits of floodplain/floodway as shown on the current FIRM may be required to process a conditional letter of map revision prior to map recordation or zoning clearance.
 7. All developments shall comply with all applicable requirements of the most current Standard Conditions for Project Plan Approval-Water Quality Best Management Practices, as administered by the Santa Barbara County Public Works Department, Project Clean Water.
 8. Development located within "Special Problems Areas" as defined in Article XIII of the Santa Barbara County Building Code may be subject to additional conditions of approval.
 9. Development located within the Repetitive Loss Zone as described in Board Resolution No. 92-138 and the Floodplain Management Plan may be subject to additional conditions of approval.
 10. Development located within the Orcutt Planning Area may be subject to Regional Drainage Impact Mitigation Fees, payable prior to map recordation or zoning clearance.
-

Design

1. The applicant submits the Grading and/or Improvement plans directly to the Flood Control District for plan check. A plan check fee deposit made payable to the Santa Barbara County Flood Control and Water Conservation District shall accompany the initial submittal. The plan check fee deposit shall be the amount as shown in the current District fee schedule. The Agreement for Payment of Plan Check Fees form is attached and is filled out by the applicant upon the initial submittal.
2. Hydrologic studies prepared by a California-licensed civil engineer shall be made of the watershed area contributing drainage to the project. Both calculations and clearly marked watershed maps shall be submitted at the plan check submittal for approval by the Public Works Director. Contributing areas shall be based on natural contours or an accepted master drainage plan. Drainage quantities shall be derived from considerations that include expected future development of the watershed, soil types, historical storm data and gradient of terrain. These considerations must receive approval by the Public Works Director. For most major channels, discharge rates will be supplied by the Public Works Director.
3. Storm drains and drainage inlets shall be sized for a peak 25-year runoff event with a positive overland escape design for a 100-year storm. Storm drains shall be constructed of at least Class III reinforced concrete pipe with a minimum diameter of 18" unless other materials, pipe classifications, or sizes are approved by the Public Works Director. When an existing culvert is to be extended and/or the grade changed, a concrete collar must be used.

4. Storm drains and drainage inlets in sump conditions shall be sized for a 100-year storm and shall provide positive overland escape. The overland escape path must be constructed in a manner to transport the peak rate of runoff assuming all storm drains are inoperative.
5. The minimum width of an easement for the installation of a storm drain shall be the pipe diameter plus 6 inches on both sides for the pipe trench, plus the distance of a 1:1 trench slope projected from the bottom of the pipe to the ground. All storm drain easements to be dedicated to the Flood Control District shall be permanently separated from the underlying residential properties by a 42" high chain link fence, or other District-approved fence type.
6. Drainage inlets shall be located and designed in a manner to assure an adequate travel lane with no more than 10 cubic feet per second conveyed per gutter, within the curbs in a 10-year storm. All 25-year storm flows shall be contained within the curbs or other conveyance as otherwise approved. Drainage design of public roadways shall conform to the requirements of the roadway's owner. At least one lane free of water in each direction shall be provided in the 10- and 25-year storm events for arterial, major and industrial street classifications; 100-year storm flows shall be contained within the right-of-way or private street easement. Drainage inlet design shall follow the methods outlined in the Federal Highway Administration's H.E.C. No. 22 (<http://isddc.dot.gov/OLPFiles/FHWA/010593.pdf>), as approved by the Flood Control District. Only curb opening inlets (no grated inlets) shall be used in sump conditions.
7. Manholes must conform to the County Standard Details within the Santa Barbara County Public Works Engineering Design Standards. Spacing of manholes shall conform to the following table:

Pipe Size, <i>d</i>	Manhole Spacing
$d \leq 30$ in	200 ft (with numerous horizontal angles/bends)
	300 ft
$30 \text{ in} < d < 45$ in	400 ft
$d \geq 45$ in	500 ft

Manholes shall also be provided in accordance with the following criteria:

- a) Where there is a sudden change in pipe size or slope.
- b) At the junctions of two converging pipes of approximately the same size.
- c) At junctions where the side inlet diameter is greater than half of the main line diameter.
- d) At junctions where the side inlet flow is greater than half of the main line flow.

8. The runoff calculations for storm drain design shall be based on the Rational Method. The Time of Concentration (T_C) shall be calculated as follows:
 - a) For agricultural areas, use the Nomograph attached to these Standard Conditions.
 - b) For urban areas, $T_C = T_T + T_L$ (Travel Time + Lot Time)

$$\text{Travel Time} = \frac{L}{60V}$$

(min)

$L = \text{length (ft)}$
 $V = \text{average velocity (ft/sec)}$

$$\text{Lot Time} = 10 \text{ min}$$

9. Rainfall Intensity curves and Rainfall Coefficient vs. Rainfall Intensity curves incorporated into the District's "Program Rational-XL" shall be used in drainage design unless otherwise directed. Curves are downloadable at <http://www.countyofsb.org/pwd/water/downloads.htm>.
10. Projects shall be designed with a clearly defined permanent overland escape path (preferably a street) for storm runoff. The escape path shall be free of obstructions including and not limited to fencing, landscaping and sound walls. Downhill cul-de-sacs are discouraged as overland escape. Downhill sump cul-de-sacs shall have an improved dedicated overland escape.
11. The lowest finish floor elevation of all new structures shall be at least 2 feet above the 100-year water surface elevation. Graded lot pads with slab on grade foundations shall be at least 1.5 feet above the 100-year water surface elevation, with finish floor 2 feet above 100-year water surface elevation. Finish floor elevations may be increased if deemed necessary by the Public Works Director. Finish floor elevations shall be higher than the water surface elevations of the overland escape of adjacent streets, bridges and other obstructions.
12. Grading and improvement plans for drainage improvements signed by a California-licensed civil engineer shall include the following information:
 - a) The design energy and hydraulic grade lines shall be on the Improvement or Underground Storm Drain profiles. Junction losses are to be calculated by the pressure plus momentum theory.
 - b) The 100-year energy and hydraulic grade lines shall be shown on plans and profiles for open channel designs.
 - c) Hydraulic data shall be included on engineering plans for all drainage improvements including channels and pipes as required by the Public Works Director.
 - d) Storm drain center lines and drainage inlet locations shall be identified on the Grading Plans.
 - e) Hydraulic/hydrologic studies shall be prepared, signed and stamped by the California-licensed civil engineer who signs the improvement plans. The final, District-approved study shall be submitted to the District in hard copy and PDF format.
13. Detention basins are required by the District to reduce the post-development peak storm water runoff discharge rate as specifically defined below:
 - In all areas of the County of Santa Barbara, except New Cuyama
 - Other areas of the County if downstream facilities are determined by the Public Works Director to be inadequate.

Basins shall be designed to meet the following standards:

- a) Hydrologic/Hydraulic Analysis: The hydrologic/hydraulic analysis of detention basins shall be performed by a California-licensed civil engineer using a commercially available version of the Santa Barbara Urban Hydrograph method or District approved equivalent.

b) The following optional input parameters must be used with SBUH:

- Runoff Method: SBUH
- Pond Routing Method: Storage-Indication
- Rainfall Distribution: SCS 24-hour, Type I distribution
- Antecedent Moisture Condition: AMC II
- Hydrograph ordinate time increment: 0.10 hour
- Rainfall Amounts, 24-hour totals:

Area	2-Year	5-Year	10-Year	25-Year	50-Year	100-Year
Buellton/Santa Ynez	2.83 in.	4.10 in.	4.93 in.	5.97 in.	6.72 in.	7.45 in.
Lompoc	2.20	3.17	3.82	4.62	5.20	5.76
Los Alamos	2.01	2.92	3.51	4.25	4.79	5.30
Sisquoc	1.89	2.74	3.30	3.99	4.49	4.98
South Coast	3.20	4.61	5.55	6.71	7.56	8.38
Santa Maria/Orcutt	1.81	2.62	3.15	3.81	4.29	4.76

- Hydrologic soil groups for areas within Santa Barbara County can be determined on-line at: <http://websoilsurvey.nrcs.usda.gov/app/>
- Curve numbers for hydrologic soil groups per Tables 2-2A through 2-2D (Runoff curve numbers) of “TR-55, Urban Hydrology for Small Watersheds,” published by USDA NRCS. TR-55 may be viewed on-line at: ftp://ftp.wcc.nrcs.usda.gov/downloads/hydrology_hydraulics/tr55/tr55.pdf
- Information on computing composite curve numbers to account for unconnected impervious areas and low-impact development (LID) design components is given in TR-55 and “Low-Impact Development Hydrologic Analysis” prepared by Prince George’s County, Maryland, a portion of which may be viewed online at: <http://www.countyofsb.org/pwd/water/derev.htm>

If LID design elements are considered in the hydrologic analysis of the project, those elements must be guaranteed to remain in place for the lifetime of the project. This guarantee must be demonstrated in the form of a written statement from the owner and/or inclusion in the development’s Covenants, Conditions and Restrictions.

- Basin data required to be submitted for District review includes:
 1. Basin input parameters listed above;
 2. Watershed map;
 3. Soil Survey Map/Hydrologic Soil Group for watershed, including copy of Soil Survey Map of subject property;

4. Specifics of proposed development (area, time of concentration, including time of concentration and composite curve number calculations);
5. Proposed basin geometry;
6. Proposed outlet works and resultant outlet works hydraulics;
7. Peak depth, peak outflow, peak storage;
8. Inflow volume, outflow volume;
9. Plotted inflow and outflow hydrographs.

c) Volume:

- Orcutt/Santa Maria and Vandenberg Village/Mission Hills: Basins shall be designed with:
 1. Not less than 0.07 acre feet per acre for residential developments or 0.10 acre feet per acre for commercial/industrial developments; and
 2. A gravity bleeder line that reduces storm water runoff (maximum outflow discharge) from a 25-year 24-hour storm event developed condition to 0.07 cubic feet per second per acre.
- Orcutt/Santa Maria, easterly of US 101: Basins shall be designed with:
 1. Not less than 0.07 acre feet per acre for residential developments or 0.10 acre feet per acre for commercial/industrial developments; and
 2. A gravity bleeder line that reduces storm water runoff (maximum outflow discharge) from a 100-year 24-hour storm event developed condition to 0.07 cubic feet per second per acre.
- Orcutt/Santa Maria, within areas of 'ineffective watershed' as shown on Plate 2 of the Flood Insurance Study of the City of Santa Maria dated December 1976: Due to the enormous volume of sumps located within the Ineffective Watershed Area (IFA), the IFA is considered to contribute no surface runoff to the surrounding area. Development proposed within areas of IFA shall be designed to not divert runoff from historical drainage patterns and in outflow discharge rates that do not exceed pre-development amounts.
- Greenhouses: Basins shall provide detention for the 2- through 100-year 24-hour storm events, where appropriate. Maximum outflow discharge rates of the post-development condition shall not exceed 75 percent of the calculated pre-development runoff.
- Santa Ynez Valley and South Coast: Basins shall provide detention such that the post-development peak storm water runoff discharge rate shall not exceed the pre-development rate for the 2-year through 100-year storm events.
- Other areas of the County: Basin volume standards will be determined on a case by case basis by the Public Works Director.

d) All detention basins shall be free draining. Terminal basins (i.e. pumped basins) are not allowed.

- e) Above ground detention basins shall be designed to meet the following standards:
- Low flow drainage: The bottom of the basin shall have a positive-draining gradient flowing to the outlet with a gravel-backfilled filter fabric encased trench to capture nuisance flow runoff. The trench shall be of sufficient size considering the characteristics of the native soils.
 - Outflow Device: Outlet pipes shall be oversized (18 inch minimum) with an orifice restriction (if necessary) to limit outflow to the maximum outflow discharges listed above. Orifice restriction plates shall be removable for emergency situations. A removable trash rack shall be provided at the outlet. Orifice plates and trash racks shall be galvanized. Mounting hardware shall utilize stainless steel bolts.
 - Emergency Overflow: An emergency overflow spillway shall be sized for the peak 100-year 24-hour storm runoff. The spillway shall be engineered and shall be reinforced concrete and shall provide appropriate downstream energy dissipation. The spillway shall be designed with a minimum of 12 inches of freeboard above the 100-year 24-hour calculated spill water surface elevation.
 - Slopes: Maximum side slopes shall be four horizontal to one vertical on interior slopes and two horizontal to one vertical on exterior slopes. A District-approved soil cement core mix design, or a two sack slurry trench shall be required on all filled levee sections. A geotechnical engineering report shall be provided for all fill levee sections. The report shall address remedial grading, benching, and slope stability of the levee sections.
 - Access Ramp: A graded 16-foot wide maintenance access ramp shall be provided down into the basin near the outlet. A 16-foot wide commercial driveway approach shall be provided where curb and gutter front the maintenance ramp.
 - Fencing: On facilities to be dedicated to the Flood Control District, perimeter fencing (minimum height of 42 inches) shall be required on all basins exceeding two feet in depth or where interior side slopes are steeper than six horizontal to one vertical. A double eight-foot wide swing gate (16 feet total) shall be provided at the access ramp. Perimeter fencing on facilities to remain private is at the option of the applicant.
 - Landscaping: The Flood Control District shall review and approve of any proposed basin landscape plan. Landscape planting shall be selected to be as maintenance free as possible. No trees and /or shrubs are to be planted within 15 feet of the basin outlet. Floating objects such as railroad ties and landscape bark are not permissible.
 - Ownership, maintenance: Ownership of the basin and maintenance thereof is the responsibility of the owner/subdivider. A notarized Maintenance Agreement is required as described later in these conditions.

- f) Underground detention systems shall be designed to meet the following standards:
- **Application:** The use of underground detention systems will be allowed on certain projects at the discretion of the Flood Control District. There is no guarantee that underground systems will be accepted on every project. Projects under consideration must have suitable site topography, acceptable downstream conditions, and shall provide evidence that there is an appropriate entity in place to provide long term maintenance.
 - **Products/Materials:** The products/materials and installation of underground systems shall meet all applicable ASTM and AASHTO standards, at the discretion of Flood Control.
 - **Manufacturer Certification:** A letter or certification from the manufacturer stating that the product design meets their requirements and constraints shall be submitted to Flood Control. The Engineer of record who stamps the drawings still has overall responsibility for the design and functionality of the system.
 - **System Design:** Underground systems may be designed with an open bottom or as a closed system. Open bottom systems are encouraged for water quality benefits. However, no credit toward the required detention volume as a result of infiltration is allowed. The bottom slope of the chamber shall be taken into consideration while calculating the available volume of the system. Systems shall be oversized 10% above the calculated required volume, or shall provide 12" of freeboard above the maximum calculated water surface elevation.
 - **Geotechnical Authorization:** A letter from a registered Geotechnical Engineer shall be submitted to Flood Control for all open bottom systems, stating that the behavior of native soils will not be adversely impacted by the introduction of water into the soil.
 - **Underground systems using aggregate void space as storage volume** may account for the assumed or calculated void ratio multiplied by a factor of 0.75 as the available storage volume. Material lab testing may be required to verify the assumed void ratio. Systems utilizing aggregate void space as storage volume shall have a positive outlet, and shall use a geotextile filter to separate the aggregate material from the surrounding soils.
 - **Outflow Device:** All underground systems shall be free draining. Outlet pipes shall be oversized (12 inch minimum) with an orifice restriction (if necessary) to limit outflow to the maximum outflow discharges listed above. Orifice restriction plates shall be removable for emergency situations. Orifice plates shall be galvanized. Mounting hardware shall utilize stainless steel bolts.
 - **Emergency Overflow:** Underground systems shall be designed to overflow back onto the project site in the event of a blockage, rather than bypassing the system. Underground overflow weirs are not allowed. This will provide clear visual evidence of system failure and the need for maintenance, while protecting downstream properties from the additional overflows. Overflow onto the project site shall be designed not to affect any structures or utilities.
 - **Pretreatment:** All flows entering the underground system shall be pre-treated with an appropriate best management practice approved by Flood Control to filter out debris, trash, and sediments. Pretreatment chambers designed as part of the main underground storage chamber shall not be counted towards the overall volume

requirements of that system. Underground pretreatment units shall have physical accessibility for inspection and maintenance.

- Ownership, maintenance: Ownership of the underground system and maintenance thereof is the responsibility of the owner/subdivider. A maintenance plan shall be submitted, and a notarized Maintenance Agreement as described later in these conditions is required.
14. Drainage improvements proposed to be dedicated to Flood Control shall be shown on stand-alone improvement plan and profile sheets. (These sheets may be incorporated within the project's overall plan set.)
 15. Development located within V-zones (Coastal High Hazard Areas) shall follow the recommendations presented in the guidance document "Coastal Construction Manual" published by the Federal Emergency Management Agency. A registered civil engineer or architect shall certify that the design and methods of construction to be used are in accordance with said guidance document (http://www.fema.gov/pdf/rebuild/mat/fema499/hgcc_fact05.pdf).
 16. A completed Floodproofing Certificate for Non-residential Structures (FEMA Form 81-65, <http://www.fema.gov/pdf/nfip/manual200610/08cert.pdf>) is required for all such buildings located within a Special Flood Hazard Area.
 17. Encroachments in the regulatory floodway require a registered civil engineer to submit a "no-rise" certification stating that the encroachments would not result in any increase in flood levels within the community during the base flood discharge. See attachment for certification form.
 18. The Flood Control District shall review and approve of any proposed landscape plan.
 19. The District reserves the right to modify these conditions as site conditions warrant.

Prior to Final Map Recordation/Zoning Clearance

1. Dedication of real property for drainage within the subdivision shall be provided. Easements shall be dedicated on the Final Map or dedicated by a separate instrument. The Developer shall reimburse the District for all costs associated with easement processing and acceptance.
2. Drainage easements for off-site drainage conveyances shall be acquired and presented to Flood Control. A title report shall accompany these easements.
3. The Maintenance Agreement (Subdivider's or Owner's Agreement) shall be notarized and is a condition of approval for development. The agreement will be perpetual and will require the present and future owners of the property to be responsible for the construction, ownership and maintenance of the private drainage improvements of the development.

4. Electronic drawings in PDF format of the fully approved Grading and/or Drainage Plans, Improvement Plans, Landscaping Plans, and Final Map shall be submitted to the District on compact disc along with one set of signed prints of the same.
 5. A copy of the project's Conditions, Covenants & Restrictions for the Homeowners Association shall be submitted to the District for approval.
 6. Surety Bonds for drainage improvements in amounts approved by the Public Works Director shall be posted with the Public Works Department for work inside the public right-of-way and with the Planning & Development Department for work outside the public right-of-way.
 7. Pursuant to County Ordinance 4536, the developer must submit evidence that all necessary permits have been received from those governmental agencies from which approval is required by Federal or State law, including a §404 of the Federal Clean Water Act (33 U.S.C. 1334), a California Department of Fish and Game Streambed Alternation Agreement (1603) and a §401 Water Quality Certification from the Regional Water Quality Control Board. The developer's attention is directed to his obligation to obtain all City and County permits/approvals as required, as well as the approval of the underlining property owner(s) of record.
 8. Prior to issuance of Building Permits, any fill material required to elevate building pads above the 100-year base flood elevation shall be compacted to a minimum of 90% relative maximum density per ASTM D-1557, and observed and reported by a Registered Civil Engineer.
-

Construction

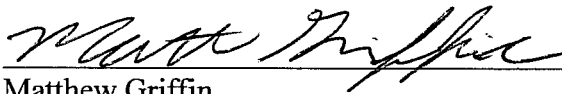
1. The developer shall obtain a Temporary Entry Permit from the District prior to construction of proposed improvements located within District right-of-way or interfacing with District facilities. A fee is required. The District shall be notified by the Contractor a minimum of two working days in advance of construction of this work. A note shall be placed on the plans to this effect.
2. The District will provide inspection of construction of proposed improvements that are to be dedicated to the District or that interface with District facilities. An inspection deposit is required. The District shall be notified a minimum of two working days in advance of this work. A note shall be placed on the plans to this effect.
3. The California-licensed civil engineer that signs the Grading and/or Improvement Plans shall be responsible for the inspection of proposed private drainage improvements and providing a Drainage Improvement Certification as described below. A note shall be placed on the plans to this effect.
4. During construction, if differing site conditions are encountered that materially affects the drainage improvements shown on the approved plans, the engineer of record shall submit

revised plans to the District for the District's review and approval prior to the construction of the work.

Close-out/Occupancy Clearance

1. Prior to occupancy clearance, the "Construction Record" drawings (both original mylars and by PDF format) shall be submitted by the engineer of record to the Santa Barbara County Flood Control and Water Conservation District of construction of proposed improvements that are to be dedicated to the District or that interface with District facilities. "Construction Record" drawings shall provide a complete and accurate record of all changes of construction from that shown in the approved plans and specifications.
 2. Prior to occupancy clearance, a Drainage Improvement Certification shall be required from the engineer of record. The District certification form (see attachment) requires that the California-licensed civil engineer certify that all drainage improvements (including but not limited to storm drains, drainage inlets, junctions, revetment, ditches, swales, channels and detention basins) were constructed in substantial conformance with the approved plans and specifications.
 3. Prior to occupancy clearance, a Project Summary Report that summarizes the hydrology and hydraulics, easement acquisitions and including reduced size plans shall be submitted to Flood Control in PDF format. Those projects that include improvements that are to be dedicated to the District or that interface with District facilities shall include actual construction costs and "construction record" drawings in electronic format as noted above.
 4. Prior to occupancy clearance, an Elevation Certificate (FEMA Form 81-31, <http://www.fema.gov/pdf/nfip/manual200610/08cert.pdf>) shall be submitted to the District's Floodplain Manager for all lots located within a Special Flood Hazard Area.
-

Standard Conditions of Approval Recommended by



1-26-2011

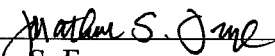
Matthew Griffin

Date

Interim Engineering Manager

Santa Barbara County Flood Control & Water Conservation District; Water Resources Division
Santa Barbara County Public Works Department

Standard Conditions of Approval Approved and Adopted by


Jonathan S. Frye

1-26-11

Date

Interim Deputy Public Works Director

Santa Barbara County Flood Control & Water Conservation District; Water Resources Division
Santa Barbara County Public Works Department

Attachments:

- Agreement for Payment of Plan Check Fees
- Nomograph for determining Time of Concentration for agricultural areas
- Plate 2 of the Flood Insurance Study of the City of Santa Maria dated December 1976: Ineffective Watershed Area (IFA)
- Floodway No-Rise Certification
- Drainage Improvement Certification

ATTACHMENTS

Agreement for Payment of Plan Check Fees

| Nomograph for determining Time of Concentration for agricultural areas

Plate 2 of the Flood Insurance Study of the City of Santa Maria dated December 1976:

Ineffective Watershed Area (IFA)

Floodway No-Rise Certification

Drainage Improvement Certification

Santa Barbara County Flood Control & Water Conservation District

Agreement for Payment of Plan Check Fees

Santa Barbara County Flood Control & Water Conservation District (hereinafter District) and

_____ (hereinafter APPLICANT) AGREE AS FOLLOWS:

1. APPLICANT has submitted to DISTRICT an application for _____
_____, Case # _____, (hereinafter PROJECT).

2. DISTRICT has set variable fees pursuant to Resolution No. 96-47. APPLICANT understands and agrees that Government Code §66451.2. authorizes DISTRICT to charge and collect reasonable fees for processing of tentative, final and parcel maps and for other procedures required or authorized by Government Code § 66451.2. or local ordinance.

3. APPLICANT and DISTRICT agree that because of the size, nature or scope of the proposed project, it is impossible to ascertain the full extent of the costs involved in processing the plan check upon initiation of case processing. APPLICANT and DISTRICT further agree that it is in the interest of the parties to permit payment of a deposit and to permit subsequent periodic billing and payment as charges are incurred. APPLICANT agrees s/he will be benefited by retaining greater cash liquidity and will pay only after costs are actually incurred. DISTRICT agrees it will be benefited through the greater certainty of recovering its full costs to process APPLICANT's plan check.

4. Therefore, pursuant to Resolution No. 96-47 APPLICANT shall pay an initial deposit, and if actual recorded costs plus administrative costs exceed the initial deposit, APPLICANT shall make periodic payments to DISTRICT to reimburse the DISTRICT for the processing of the plan check mentioned above. Such periodic payments shall be made within 30 days of the billing date. APPLICANT further agrees that failure to pay such accrued costs shall be grounds for plan checks not being considered complete for signature.

APPLICANT

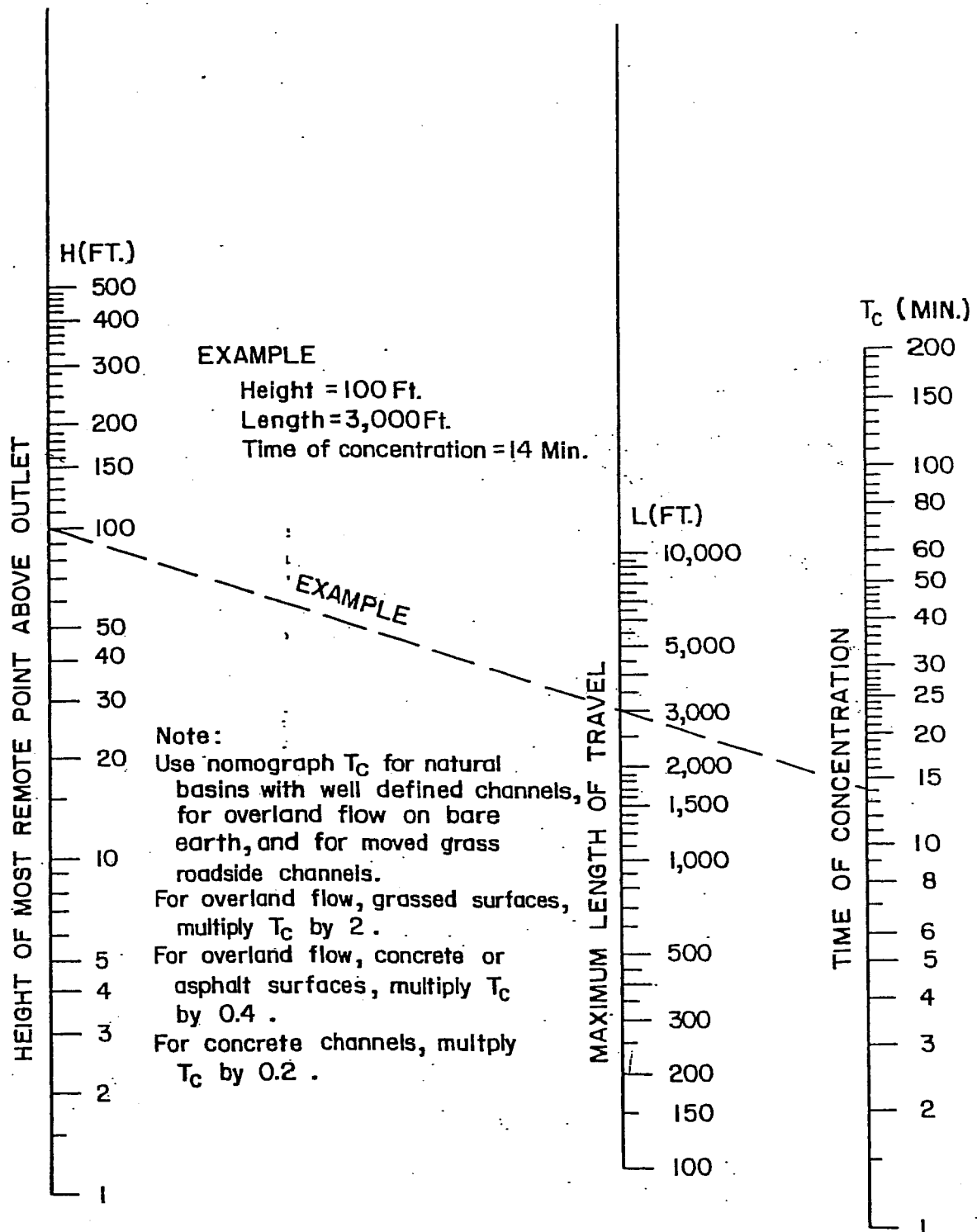
SANTA BARBARA COUNTY FLOOD
CONTROL & WATER CONSERVATION
DISTRICT

BY: _____

BY: _____

DATE: _____

DATE: _____



SANTA BARBARA COUNTY
 DEPARTMENT OF PUBLIC WORKS
 ROAD DIVISION

TIME OF CONCENTRATION OF
 SMALL DRAINAGE BASINS

FIGURE
 3 2-20



CERTIFICATION OF A “NO-RISE” DETERMINATION FOR A PROPOSED FLOODWAY DEVELOPMENT

Community Name

Development Name

Lot/Property Designation

Property Owner

I hereby certify that the proposed remedial measures, in combination with the property development designated above, will result in no loss of flow conveyance during the occurrence of the 1 percent annual chance of exceedence (100-year flood) discharge.

I further certify that the data submitted herewith in support of this request are accurate to the best of my knowledge, that the analyses have been performed correctly and in accordance with sound engineering practice, and that the proposed structural works are designed in accordance with sound engineering practice.

Date

Registered Professional Engineer

**SANTA BARBARA COUNTY FLOOD CONTROL
& WATER CONSERVATION DISTRICT**

DRAINAGE IMPROVEMENT CERTIFICATION

PROJECT NAME _____

TM/TPM# _____

DP/CP# _____

ADDRESS OF PROJECT _____

APN# _____

I, the undersigned California Registered Civil Engineer, hereby certify that I or my authorized agent have inspected the Drainage Improvements (including but not limited to storm drains, drainage inlets, junctions, revetment, ditches, swales, channels and detention basins) required for the approval of the above referenced Project and that the said Drainage Improvements were constructed in substantial conformance with the approved grading and/or Improvement Plans. Sufficient material tests, where applicable, have been taken to assure that Santa Barbara County standards/specifications have been met. Copies of material tests are attached as part of this certification.

DATED _____

SIGNATURE OF CIVIL ENGINEER

TYPED NAME OF CIVIL ENGINEERING/REG NO

FIRM OR COMPANY NAME

Seal

ADDRESS OF FIRM

SUBMIT COMPLETED FORM TO THE SANTA BARBARA COUNTY FLOOD CONTROL & WATER CONSERVATION DISTRICT PRIOR TO OCCUPANCY CLEARANCE REQUEST.

Letter A1

COMMENTER: Matt Griffin, Flood Control District Engineering Manager, Santa Barbara County Flood Control & Water Conservation District

DATE: December 4, 2025

Response A1.1

Brittany Odermann, Deputy CEO, County of Santa Barbara, transmitted the comments of the Santa Barbara County Flood Control and Water Conservation District. No response is necessary.

Response A2.2

The commentor states the project site is currently unimproved and historically used for agriculture, with no existing structures. The commentor states that commercial development will rapidly increase and accelerate runoff from the site, which could significantly impact downstream properties and roadways because the site is west of most city drainage and flood control improvements.

As discussed on page 61 of the Initial Study (IS) (IS/EIR Appendix A), the proposed project is required to comply with the City of Santa Maria Municipal Code Chapter 8-12A and the Central Coast Regional Water Quality Control Board's Post-Construction Stormwater Management Requirements. The proposed project would include bioretention basins, permeable pavers, landscaped areas, and other flow-control and treatment features sized to manage the increased impervious surface area. These facilities are specifically designed to capture, treat, infiltrate, and slowly release stormwater consistent with regulatory requirements and standard engineering practice in the Santa Maria Valley. No further response is required.

Response A1.3

The commentor states that the Flood Control District's Standard Conditions of Project Plan Approval require detention basins to collect all onsite flows and release them at a controlled rate not to exceed 0.07 cubic feet per second (cfs) per acre of development.

The proposed project has been designed to meet these requirements. As discussed on page 4 of the IS (IS/EIR Appendix A), the proposed project would incorporate low impact development (LID) measures including bioretention basins, permeable surfaces, and landscaped areas that are sized to ensure that post-construction runoff rates do not exceed pre-development conditions. These features are consistent with both City stormwater standards and the Flood Control District's requirements for flow attenuation and rate control.

Response A1.4

The commentor states that an alternative approach could involve conveying stormwater to the Santa Maria River, though this may be challenging due to distance and lack of public right-of-way.

This comment is acknowledged. The project's stormwater system has been designed to meet all required standards, therefore assessing an alternative system is not necessary.

Response A1.5

The commentor states that detention basins are the recommended mitigation measure, consistent with standard practice in the Santa Maria Valley, to address increased runoff from new development.

Refer to Response to comment A1.1.



RE: 1680 West Stowell EIR

From Carly V. Barham <BarhamC@sbcapcd.org>
Date Mon 12/8/2025 10:56 AM
To Cody Graybehl <cgraybehl@cityofsantamaria.org>
Cc Bryan D. Wong <WongB@sbcapcd.org>

*** EXTERNAL EMAIL: Please use caution when opening links or attachments.***

Hi Cody,

Hope you had a great weekend, and an enjoyable Thanksgiving break a few weeks ago. We wanted to circle back to see if the City was able to discuss the approach to the GHG impact analysis for the Stowell distribution facility with Rincon and/or if the City has further thoughts/concerns with the methodology?

As we discussed, reading through the Initial Study, the analysis seems to miss the mark on evaluating criteria "a."

8. Greenhouse Gas Emissions


Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?			X	
b. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?			X	

A2.1

If I'm understanding it correctly, the analysis seems to be contenting that this impact will be evaluated using the project's consistency with a qualified GHG reduction plan and uses the 2022 CARB Scoping Plan and 2023 SBCAG RTP/SCS to tier from. I don't believe that either of these plans would meet the definition of a qualified GHG reduction plan consistent with CEQA Guidelines Section 15183.5. The project's consistency with the 2022 Scoping Plan and RTP/SCS would be applicable to the evaluation of impact criteria "b."

We just received an EIR completed by Rincon for the [City of Goleta Shelby Residential Project](#). If you review the GHG Impact Analysis (Section 4.6.3, pages 4.6-9 through 4.6-16), this discussion is much more in line with our understanding of appropriate methodology and substantial evidence for these impact determinations.

Thanks,
Carly

 **Carly Barham**
Planning Division
Air Pollution Control District
Santa Barbara County

Letter A2

COMMENTER: Carly V. Barham, Planning Division, Air Pollution Control District, Santa Barbara County

DATE: December 8, 2025

Response A2.1

The commenter states that the City should clarify its approach to the GHG impact analysis for the Stowell distribution facility.

The City of Santa Maria does not have a Climate Action Plan (CAP) or similar document and therefore there are no numeric thresholds or local verified CAP with which to compare emissions for determining significance. Santa Barbara County has a CAP, however that is unincorporated County only and does not include the City emissions, therefore it is not directly applicable to the Incorporated areas. Without conducting a City-wide inventory, the project itself cannot come up with an appropriate numeric threshold. The project implemented the use of consistency with State and Regional GHG reduction plans for the determination of both CEQA impact questions. Under CEQA, significance may be evaluated based on consistency with applicable State and regional GHG reduction plans and policies when local thresholds or CAPs are currently not available. Accordingly, the IS evaluates GHG impacts based on consistency with State and regional plans, such as the 2022 Scoping Plan, which establishes the framework that future local CAPs and numeric thresholds would be expected to implement. Therefore, consistency with the plans that would be used to develop local CAPs and/or numeric thresholds would make the proposed project consistent with potentially established verified plans and/or numeric thresholds. Further, the methodology used for the IS is consistent with the methodology used in the City's General Plan EIR. No further response is required.

Letter A3



Impact of traffic to schools on or near Stowell Rd.

From John Hollinshead <johnhollinshead@smbd.net>

Date Thu 12/18/2025 4:22 PM

To Cody Graybehl <cgraybehl@cityofsantamaria.org>; Darren McDuffie <dmcduffie@smbd.net>

*** EXTERNAL EMAIL: Please use caution when opening links or attachments.***

Hello Dr. McDuffie and Mr. Graybehl,

I spoke on behalf of myself and the SMBSD at a recent planning commission study session that was centered on a proposed Amazon distribution site on West Stowell Rd, 2.8 miles west of Hwy US 101. I expressed my dismay as a board member that we had not been privy to this development or asked how the traffic associated with it on Stowell would have adverse affects on our sites and the safe timely arrival of our students. There are multiple sites on/adjacent to Stowell and just removed a block or two. In addition the arteries off Stowell feed additional schools. Stowell is a historically heavily impacted road and has very limited capacity to change its volume physically. Currently the chief remediation of negative impact would involve attempting to better time traffic signals through updated new hardware and software at main thoroughfares. Needless to say, as a resident of Speed street, I have currently seen the diversion of traffic on my street that is a result of daily ebbs and flows of traffic density on Stowell, Broadway, and Miller. It is not enjoyable as a resident to have heavy and sometimes loud (trucks) travel on our residential street to bypass build up on the aforementioned roads, nor is it safe for our students and family as they make their way to and from their respective sites. There are multiple start times depending on our sites and the Santa Maria High School.

A3.1

A3.2

Mr. Graybehl was kind enough to reach out after the study session to express his apologies for the school district not having been notified of this development and thus included in providing feedback and questions about its impact upon us. He asked in turn to know the contact information for whomever would be best to contact for current and future communication of these projects, which affect our schools and their attendees/families. Hopefully this email can provide a jumping off point for providing that person(s) name(s) and communicating the impacts that this and future projects would have on our District. I know the city is working toward making this a more livable and safe place to call home. The governance team needs to balance the immediate need for funding and jobs with the long term safety, housing, and possible adverse livability impacts of our city to perpetuate that goal.

A3.3

Thank you both for your time and consideration in this community matter.

Best regards,

John Hollinshead
johnhollinshead@smbd.net
Santa Maria Bonita School Board
Trustee District 5

Letter A3

COMMENTER: John Hollinshead, Trustee District 5, Santa Maria-Bonita School District

DATE: December 18, 2025

Response A3.1

The commenter expresses concern that the school district was not informed about the project or consulted on potential traffic impacts to school sites along or near Stowell Road, which could affect the safe timely arrival of students.

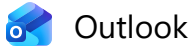
This comment is acknowledged. The City provided formal notice to the school district during the Notice of Preparation (NOP) review period. City staff received certified mail receipts from multiple school district representatives confirming delivery of the NOP materials. The certified mailing and distribution list used to notify school district representatives were included in the City's correspondence to the school district. No further response is required.

Response A3.2

The commenter notes that Stowell Road is historically heavily impacted, has limited capacity for physical expansion, and serves as an artery to multiple schools. Current mitigation options appear limited to improved traffic signal timing through updated hardware and software. The commenter shares personal observations as a resident of Speed Street, where traffic includes heavy and loud trucks that bypasses congestion on Stowell, Broadway, and Miller, creating safety concerns for students and families.

The City acknowledges the commenter's concerns regarding student safety along Stowell Road. As described in the Draft EIR, project-generated traffic does not coincide with the peak school traffic periods and therefore is not anticipated to affect the safe and timely arrival of students. The project's traffic analysis evaluated the distribution of project-generated trips throughout a typical day and found that most trips would occur during non-peak traffic periods in the morning and evening. As shown in the chart below, project-related trips would occur primarily during the mid-morning and early afternoon, outside of school peak traffic periods. In addition, project van delivery drivers would use a routing application that incorporates real-time traffic data to avoid congested corridors and identify the most efficient travel paths for deliveries. Residential streets would be used only when making direct deliveries to homes. Traffic congestion on Stowell Road occurs at specific times of day and is associated with different school related activities. School-related traffic appears primarily in the early morning between approximately 7:30 and 8:30 a.m., corresponding with student drop-off periods for kindergarten, elementary, and high schools. Additional school-related traffic occurs in the mid-afternoon, around 2:30 to 4:00 p.m., aligning with student dismissal times. Project-related traffic would occur intermittently throughout the day, with noticeable activity during mid-morning (around 9:00 to 11:00 a.m.) and again in the afternoon at 2:00 p.m. and at 4:30 p.m., outside school-related traffic periods. The chart below illustrates the times of day when project trips are expected to occur and compares them to the school traffic periods identified in the TIS.

Letter A4



Re: Impact of traffic to schools on or near Stowell Rd.

From Darren McDuffie <dmcduffie@smbd.net>
Date Fri 12/19/2025 3:00 PM
To John Hollinshead <johnhollinshead@smbd.net>
Cc Cody Graybehl <cgraybehl@cityofsantamaria.org>

*** EXTERNAL EMAIL: Please use caution when opening links or attachments.***

Dear Board Member Hollinshead,

Thank you for reaching out and providing this detailed information regarding the proposed Amazon distribution site on West Stowell Road.

I appreciate you bringing your concerns to the forefront, particularly regarding student safety and the existing traffic density issues. Your insights as both a board member and a resident are invaluable as we evaluate the potential impact on our school sites and surrounding neighborhoods.

I will work with our staff to review the specifics of this development and connect with Mr. Graybehl to provide additional feedback and build a communication bridge for future projects.

Thank you again for your time and advocacy on behalf of our students and families.

Best regards,

--

Dr. Darren McDuffie

Superintendent of Schools

Santa Maria-Bonita School District

708 S. Miller Street, Santa Maria, CA 93454

dmcduffie@smbd.net | 805-361-8110



**Santa Maria-Bonita
School District**
CULTIVATING BRIGHT FUTURES

On Thu, Dec 18, 2025 at 4:22 PM John Hollinshead <johnhollinshead@smbd.net> wrote:

Hello Dr. McDuffie and Mr. Graybehl,

I spoke on behalf of myself and the SMBSD at a recent planning commission study session that was centered on a proposed Amazon distribution site on West Stowell Rd, 2.8 miles west of Hwy US 101. I expressed my dismay as a board member that we had not been privy to this development or asked how the traffic associated with it on Stowell would have adverse affects on our sites and the safe timely arrival of our students. There are multiple sites on/adjacent to Stowell and just removed

A4.1

a block or two. In addition the arteries off Stowell feed additional schools. Stowell is a historically heavily impacted road and has very limited capacity to change its volume physically. Currently the chief remediation of negative impact would involve attempting to better time traffic signals through updated new hardware and software at main thoroughfares. Needless to say, as a resident of Speed street, I have currently seen the diversion of traffic on my street that is a result of daily ebbs and flows of traffic density on Stowell, Broadway, and Miller. It is not enjoyable as a resident to have heavy and sometimes loud (trucks) travel on our residential street to bypass build up on the aforementioned roads, nor is it safe for our students and family as they make their way to and from their respective sites. There are multiple start times depending on our sites and the Santa Maria High School.

Mr. Graybehl was kind enough to reach out after the study session to express his apologies for the school district not having been notified of this development and thus included in providing feedback and questions about its impact upon us. He asked in turn to know the contact information for whomever would be best to contact for current and future communication of these projects, which affect our schools and their attendees/families. Hopefully this email can provide a jumping off point for providing that person(s) name(s) and communicating the impacts that this and future projects would have on our District. I know the city is working toward making this a more livable and safe place to call home. The governance team needs to balance the immediate need for funding and jobs with the long term safety, housing, and possible adverse livability impacts of our city to perpetuate that goal.

Thank you both for your time and consideration in this community matter.

Best regards,

John Hollinshead
johnhollinshead@smbd.net
Santa Maria Bonita School Board
Trustee District 5

Letter A4

COMMENTER: Dr. Darren McDuffie, Superintendent of Schools. Santa Maria-Bonita School District

DATE: December 19, 2025

Response A4.1

The commenter acknowledges receipt of an email from a Santa Maria-Bonita School District Board Member about the proposed fulfillment center distribution site and concerns raised regarding student safety and traffic density. The commenter plans to coordinate with the City Planner and maintain communication for future projects.

The comment is acknowledged. John Hollinshead of the Santa Maria Bonita School District provided additional comments related to the project. Responses to his comments are included in Letters A3 and A7 of this Response to Comment document. The City's responses to those letters are provided therein. No further response is required.



December 19, 2025

Letter A5

VIA EMAIL

Mr. Cody Graybehl
 City of Santa Maria Planning Department
 110 S Pine St, Santa Maria, CA 93458
cgraybehl@cityofsantamaria.org

Property Owner(s): Seefried Industrial Properties
 Project Location Address: 1680 West Stowell Road in Santa Maria, California

PROJECT TITLE: PACKAGE DELIVERY WAREHOUSE PLANNED DEVELOPMENT SCH 2025080640

Public Resources Code (PRC) section 3208.1 establishes re-abandonment responsibility when previously plugged and abandoned oil, gas or geothermal wells will be impacted by planned property development or construction activities. Local permitting agencies, property owners, and/or developers should be aware of, and fully understand, that significant and potentially dangerous issues may be associated with development near previously abandoned oil, gas, and geothermal wells.

A5.1

The California Geologic Energy Management Division (CalGEM) has received the above-referenced project dated August 8, 2025. To assist local permitting agencies, property owners, and developers in making safe and practical land use decisions regarding potential development near oil, gas, or geothermal wells, CalGEM provides a table in the attached enclosure of the wells within the parcel boundary or in its vicinity, based on CalGEM's Well Finder database (<https://maps.conservation.ca.gov/doggr/wellfinder/>).

CalGEM categorically advises against building over, or in any way impeding access to, oil, gas, or geothermal wells. Impeding access to a well could result in the need to remove any structure or obstacle that prevents or impedes access including, but not limited to, buildings, housing, fencing, landscaping, trees, pools, patios, sidewalks, roadways, and decking at the landowner's expense if there is a need to access a well. Maintaining sufficient access is considered the ability for a well servicing unit and associated necessary equipment (consisting of well servicing rig, pumping equipment, pipe trailer) to reach a well from a public street or access way, solely over the parcel on which the well is located. A well servicing unit, and any necessary equipment, should be able to pass unimpeded along and over the route, and should be able to access the well without disturbing the integrity of surrounding infrastructure. Impermeable barriers such as asphalt, concrete, and plastic may trap hazardous gases and liquids underneath and could create a safety hazard if built over a well that later develops a leak.

A5.2

CalGEM recommends that any well for which access is impeded or built over, against CalGEM's advice, should be evaluated by a qualified petroleum professional for compliance with the statutory objectives of isolating all hydrocarbon-bearing strata; protecting underground and surface waters; prevention of subsequent damage to life, health, property, and other resources; and prevention of loss of oil, gas, or reservoir energy. CalGEM recommends that wells that do not meet these standards are abandoned or re-abandoned prior to construction.

State of California Natural Resources Agency | Department of Conservation
 Northern District

Orcutt Office and Mail: 195 S. Broadway, Suite 101, Orcutt, CA 93455 | T: (805) 937-7246 | F: (805) 937-0673
 Sacramento Office and Mail: 715 P Street, MS 1804, Sacramento, CA 95814 | T: (916) 322-1110 | F: (916) 445-3319
 Ventura Office: 4820 McGrath Street, Suite 210, Ventura, CA 93003 | T: (805) 937-7246 | F: (805) 654-4765
 Ventura Mail: 195 S. Broadway, Suite 101, Orcutt, CA 93455

Mr. Cody Greyben

December 19, 2025

The well information can be accessed through CalGEM's Well Finder database mentioned above. PRC section 3208, subdivision (a), provides the primary statutory authority for CalGEM to oversee adequate abandonment of wells. Additionally, CalGEM has developed the regulatory guidance for operators to be followed during well abandonment, which are listed within California Code of Regulation, title 14 (CCR) section 1723 and associated sub-sections (for onshore wells), and section 1745 and associated sub-sections (for offshore wells).

There is no guarantee that a well abandoned in compliance with current Division requirements as prescribed by law will not start leaking in the future. Due to the inability to predict all subsurface conditions or changes, it always remains a possibility that any well may start to leak oil, gas, and/or water after abandonment, no matter how thoroughly the well was plugged and abandoned. CalGEM acknowledges wells plugged and abandoned to the most current Division requirements as prescribed by law have a lower probability of leaking in the future, however there is no guarantee that such abandoned wells will not leak.

CalGEM advises that all wells identified on the development parcel prior to, or during, development activities be tested for liquid and gas leakage. Surveyed locations in Latitude and Longitude, NAD 83 decimal format, and leak testing results should be provided to CalGEM. CalGEM expects any wells found leaking to be reported to CalGEM immediately.

PRC section 3208.1 gives CalGEM the authority to order or permit the re-abandonment of any well where it has reason to question the integrity of the previous abandonment. Responsibility for re-abandonment costs may be affected by the choices made by the local permitting agency, property owner, and/or developer in considering the general advice set forth in this letter. The PRC continues to define the person or entity responsible for re-abandonment as:

1. The property owner - If the well was plugged and abandoned in conformance with Division requirements at the time of abandonment, and in its current condition does not pose an immediate danger to life, health, and property, but requires additional work solely because the owner of the property on which the well is located proposes construction on the property that would prevent or impede access to the well for purposes of remedying a currently perceived future problem, then the owner of the property on which the well is located shall obtain all rights necessary to re-abandon the well and be responsible for the re-abandonment.
2. The person or entity causing construction over or near the well - If the well was plugged and abandoned in conformance with Division requirements at the time of plugging and abandonment, and the property owner, developer, or local agency permitting the construction failed either to obtain an opinion from the supervisor or district deputy as to whether the previously abandoned well is required to be re-abandoned, or to follow the advice of the supervisor or district deputy not to undertake construction that impedes access, then the person or entity causing the construction over or near the well shall obtain all rights necessary to re-abandon the well and be responsible for the re-abandonment.
3. The party or parties responsible for disturbing the integrity of the abandonment - If the well was plugged and abandoned in conformance with Division requirements at the time of plugging and abandonment, and after that time someone other than the operator or an affiliate of the operator disturbed the integrity of the abandonment in the course of developing the property, then the party or parties responsible for disturbing the integrity of the abandonment shall be responsible for the re-abandonment.

A5.2

A5.3

Should any wells require abandonment or re-abandonment, the responsible party must submit a Notice of Intention (NOI) to CalGEM through WellSTAR. The NOI form can be accessed in the 'Plugging and Abandonment' section of the following link:

https://www.conservation.ca.gov/calgem/for_operators.

A5.4

No well work may be performed on any oil, gas, or geothermal well without written approval from CalGEM. Well work requiring approval includes, but is not limited to, mitigating leaking gas or other fluids from abandoned wells, modifications to well casings, and/or any other re-abandonment work. CalGEM also regulates the top of a plugged and abandoned well's minimum and maximum depth below final grade. CCR section 1723.5 states well casings shall be cut off at least 5 feet but no more than 10 feet below the surface of the ground. If any well needs to be lowered or raised (i.e. casing cut down or casing riser added) to meet this regulation, a permit from CalGEM is required before work can start.

CalGEM makes the following additional recommendations to the local permitting agency, property owner, and developer:

A5.5

1. To ensure that present and future property owners are aware of (a) the existence of all wells located on the property, and (b) potentially significant issues associated with any improvements near oil or gas wells, CalGEM recommends that information regarding the below identified well(s), and any other pertinent information obtained after the issuance of this letter, be communicated to the appropriate county recorder for inclusion in the title information of the subject real property.
2. CalGEM recommends that any soil containing hydrocarbons be disposed of in accordance with local, state, and federal laws. Please notify the appropriate authorities if soil containing significant amounts of hydrocarbons is discovered during development.

As indicated in PRC section 3106, CalGEM has statutory authority over the drilling, operation, maintenance, and abandonment of oil, gas, and geothermal wells, and attendant facilities, to prevent, as far as possible, damage to life, health, property, and natural resources; damage to underground oil, gas, and geothermal deposits; and damage to underground and surface waters suitable for irrigation or domestic purposes. In addition to CalGEM's authority to order work on wells pursuant to PRC sections 3208.1 and 3224, it has authority to issue civil and criminal penalties under PRC sections 3236, 3236.5, and 3359 for violations within CalGEM's jurisdictional authority. CalGEM does not regulate grading, excavations, or other land use issues.

A5.6

Should you have any questions, or if any wells are encountered that were not part of this letter, contact CalGEM at 805-937-7246 or via email at CalGEMNorthern@conservation.ca.gov.

Sincerely,



Jon Iverson
Supervising Oil & Gas Engineer
Northern District

Enclosure

cc: Ben Ochoa bochoa@seefriedproperties.com,
Eric VonBerg evonberg@rinconconsultants.com
jan.perez@conservation.ca.gov
OLRA@conservation.ca.gov
state.clearinghouse@opr.ca.gov
Chrono
CSWR Folder
Well File

Enclosure: The wells listed below are reported to be located within and nearby the parcel boundary and may have future access impeded.

A5.7

API No.	Well Name
0408302417	Hope 1

Letter A5

COMMENTER: Jon Iverson, Supervising Oil & Gas Engineer, Northern District, California Department of Conservation, Geologic Energy Management Division

DATE: December 19, 2025

Response A5.1

The commenter summarized Public Resources Code Section 3208. This comment is acknowledged. No further response is required.

Response A5.2

The commenter states that building over or impeding access to oil, gas, or geothermal wells should be avoided. The commenter states that sufficient access for well servicing equipment must be maintained and warns that impermeable barriers like asphalt or concrete can trap hazardous gases and create safety hazards. The commenter states that any well with impeded access should be evaluated by a qualified petroleum professional and, if necessary, abandoned or re-abandoned prior to construction to meet safety standards.

Although the proposed project cannot avoid the well location, the City is requiring full compliance with all applicable CalGEM rules in compliance with State regulations to maintain required access and implement safety measures consistent with current guidelines. As discussed on page 1-13 of the Draft EIR, oil well abandonment work, including sealing off oil and gas bearing units, pressure grouting, etc. actions would be performed by a State-licensed contractor under the regulatory oversight and approval of CalGEM. This re-abandonment work would be conducted prior to conducting subsurface activities. No further response is required.

Response A5.3

The commenter states that all wells on the parcel should be tested for liquid and gas leakage, with survey coordinates and test results submitted to CalGEM. The commenter states that any leaks must be reported immediately. The commenter states that responsibility for re-abandonment falls on the property owner, developer, or any party disturbing well integrity, depending on circumstances outlined in PRC section 3208.1.

This comment is acknowledged. This comment does not pertain to the proposed project or the environmental analysis presented in the Draft EIR. The City would require full compliance with all applicable CalGEM rules in compliance with State regulations to maintain required access, and implement safety measures consistent with current guidelines. No further response is required.

Response A5.4

The commenter states that a Notice of Intention must be submitted via WellSTAR and written approval obtained from CalGEM before any well work, including abandonment or casing modifications. The commenter states that well casings must be cut off 5–10 feet below grade per CCR section 1723.5.

This comment is acknowledged. The project shall comply with all applicable CalGEM regulations, including the requirement under CCR Section 1723.5 that well casings be cut and sealed 5–10 feet below grade. All abandonment activities would be completed in accordance with current CalGEM standards and procedures, as discussed on page 1-13 of the Draft EIR. No further response is required.

Response A5.5

The commenter states that well information should be recorded in property title documents for future owners and that any hydrocarbon-contaminated soil should be disposed of according to applicable laws.

The City acknowledges these requirements. Well information shall be recorded in the property title documents for disclosure to future owners. Hydrocarbon-contaminated soil encountered during project activities would be managed and disposed of in accordance with all applicable federal, state, and local regulations, as discussed on page 1-13 of the Draft EIR. No further response is required.

Response A5.6

The commenter restates CalGEM's jurisdiction and regulatory authority and provides contact information should questions arise.

This comment is acknowledged. No further response is required.

Response A5.7

The commenter states that one well, Hope 1 (API No. 0408302417), is located within or near the parcel and may have future access impeded.

The City acknowledges the presence of Hope 1 well (API No. 0408302417) within the project site. As discussed on page 2-13 of the Draft EIR, the proposed project would ensure that project design and access requirements comply with all applicable CalGEM setback, access, and operational standards. If any access needs for CalGEM inspection, maintenance, or monitoring are identified, the proposed project would be designed to accommodate those requirements consistent with state regulations. No further response is required.



December 24, 2025

Cody Graybehl
 City of Santa Maria
 Community Development Department
 110 South Pine Street, #101
 Santa Maria, California 93458

Sent Via Email: cgraybehl@cityofsantamaria.org

Re: Santa Barbara County Air Pollution Control District Comments on the Draft Environmental Impact Report for the Stowell Road Package Delivery Warehouse, SCH # 2025080640

Dear Mr. Graybehl:

The Santa Barbara County Air Pollution Control District (District) has reviewed the referenced project, which consists of a 244,418 square foot package delivery warehouse. The delivery warehouse will operate 24/7 to support delivery of packages to customer locations between 10:00 a.m. and 9:00 p.m. The main on-site facility will include delivery and distribution, office and processing uses, including shipping and receiving of packages. A fleet service center is also proposed. Approximately 34 line-haul trucks (semi-trailer trucks) are expected to deliver packages to the warehouse each day. Up to 345 delivery vans may depart from the delivery warehouse at a rate of up to 72 vans per 20 minutes to facilitate regulated traffic flow into the surrounding area. The project includes a Tier 4, diesel-powered emergency fire pump engine. Construction of the proposed project is anticipated to occur over one year, from approximately March 2026 through July 2027. Electricity will be provided by Pacific Gas & Electric and no natural gas pipes will be installed. Solar roof arrays and an 'after the meter' Battery Energy Storage System will be installed to offset electrical energy demand with a design capacity of 750 kilowatts direct current. As part of the project's development proposal, an oil and gas well (Hope Well# 1, API# 0408302417) located in the southwestern corner of the project site abandoned in the 1950s is planned to be re-abandoned in accordance with current CalGEM standards. The subject property, a 32-acre parcel zoned PD/CM-AG (Planned Development/Commercial Manufacturing - Agriculture Overlay) and identified in the Assessor Parcel Map Book as APN 117-820-012 and 117-820-013, is located at 1680 West Stowell Road in the City of Santa Maria.

A6.1

The District has the following comments on the Draft EIR:

- 1. Air Quality Mitigation.** The EIR includes Table 1-2: *Issues Not Studied in the EIR*. Air Quality is listed as an issue area not studied and it is noted that the inclusion of Mitigation Measure AQ-1: *Line-Haul Trucks Requirement* will reduce the project's impact of criteria pollutant emissions to a less than significant level. Please ensure that MM AQ-1 is included in the Mitigation Monitoring and Reporting Plan (MMRP) for the project. The MMRP should explicitly state the required mitigations and establish a mechanism for enforcement. As previously mentioned in our letter dated September 6, 2024, we recommend that the measure include additional specificity as to how ongoing compliance with the model year commitment will be monitored and enforced, such as through a robust trucking plan.

A6.2

Additionally, the language of MM AQ-1 is unclear and revisions are advised to align the language with the intended requirement(s). Currently, the measure states that: *“The proposed project owner or operators shall require the use of line-haul trucks with model years 2014 or newer **that meet Tier 4 Standards for off-road diesel engines** [emphasis added].”* The proposed line-haul trucks are not off-road engines subject to the EPA Tier standards for off-road equipment. Therefore, we suggest the measure be revised to state that the proposed project is required to use line-haul trucks with model year 2014 or newer on-road engines. Separately, please consider if it is the City’s/applicant’s intention to include a mitigation measure that requires the use of off-road diesel engines that meet Tier 4 emission standards, either during the construction and/or operational phase of the project.

A6.2

2. **Greenhouse Gas Analysis.** The EIR indicates that greenhouse gas (GHG) emissions will not be studied in the EIR as the Initial Study found impacts to be less than significant. As noted in our September 15, 2025 letter in response to the NOP of an EIR, we advise that the City consider whether the Initial Study has accurately and adequately evaluated the potential GHG impacts of the project. Impact criteria “a.” requires an analysis of whether the project would generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment. The Initial Study states that this impact will be evaluated using the project’s consistency with a qualified GHG reduction plan and uses the 2022 CARB Scoping Plan and 2023 SBCAG RTP/SCS to tier from. It is our understanding that neither of these plans would meet the definition of a qualified GHG reduction plan consistent with CEQA Guidelines Section 15183.5. The project’s consistency with the 2022 Scoping Plan and RTP/SCS is more closely applicable to the evaluation of impact criteria “b.,” whether the projects conflicts with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases. In sum, the City should ensure that the project’s GHG impacts have been adequately disclosed, analyzed, and mitigated as necessary.

A6.3

3. **Oil Well Abandonment.** Please note that if contaminated soils are found at the project site, either through the re-abandonment of the oil and gas well or other earth-moving activities, the District must be contacted to determine if an Authority to Construct, Permit to Operate and/or a written permit exemption approval will be required. District permits are required for all soil vapor extraction activities. District permits are also required for the excavation (“dig-and-haul”) of more than 1,000 cubic yards of contaminated soil. Excavation projects less than or equal to 1,000 cubic yards are eligible for a written permit exemption. Proof of receipt of the required District permit or permit exemption should be submitted by the applicant to planning staff prior to grading/building permit issuance.

A6.4

4. **Construction Impacts.** The *Air Quality and Greenhouse Gas Technical Report for the West Stowell Delivery Station* (May 22, 2025) states on page 22 that off-road equipment greater than or equal to 50 horsepower (HP) will utilize Tier 4 Final engines. As such, a Tier 4 construction fleet for equipment greater than or equal to 50 HP was assumed when modeling the project in CalEEMod. The lead agency should ensure this project design feature is implemented through permit conditions or other enforceable mechanism. In addition, to minimize construction-related impacts, the District’s fugitive dust reduction measures (**Attachment A**) and diesel exhaust reduction measures (**Attachment B**) are recommended for all construction and/or grading activities.

A6.5

5. **Operational Diesel Particulate and NO_x Emission Reduction Measures:** Particulate emissions from diesel exhaust are classified as carcinogenic by the state of California. To reduce air quality and health risk impacts from mobile sources associated with warehouses and distribution centers, all feasible air pollution emission reduction measures should be included into project design in addition to Mitigation Measure AQ-1: *Line-Haul Trucks Requirements*. Please see the operational-phase diesel equipment exhaust control measures in **Attachment C**.

6. **Permits Required/CEQA Role:** The proposed project includes installation of a diesel-powered emergency fire pump (317 HP, Tier 4 Final engine) to provide water for the building's fire suppression system. The equipment will require a District Authority to Construct (ATC) permit and as part of District permit issuance, a health risk assessment (HRA) will be required to demonstrate that operation of this equipment does not cause a significant risk to surrounding receptors. The District will not issue a permit if an HRA shows that a significant impact will occur. As a responsible agency under the California Environmental Quality Act (CEQA) on this project, the District will make a decision on the adequacy of the CEQA document for our use when issuing air permits. Any unmet requirements for environmental review pursuant to CEQA will be addressed as part of District permit issuance.

A6.6

A6.7

If you or the project applicant have any questions regarding these comments, please feel free to contact me at (805) 979-8337 or via email at BarhamC@sbcapcd.org.

Sincerely,



Carly Barham,
Planning Division

Attachments: Attachment A: Fugitive Dust Control Measures
Attachment B: Construction Diesel Particulate and NO_x Emission Measures
Attachment C: Operational Diesel Particulate and NO_x Emission Measures

cc: Planning Chron File



**ATTACHMENT A
FUGITIVE DUST CONTROL MEASURES**

Projects involving earthmoving activities are expected to manage fugitive dust emissions such that emissions do not exceed APCD's visible emissions limit (APCD Rule 302), create a public nuisance (APCD Rule 303), and are in compliance with the APCD's requirements and standards for visible dust (APCD Rule 345). The following measures should be implemented to reduce fugitive dust emissions and impacts.

- During construction, use water trucks, sprinkler systems, or dust suppressants in all areas of vehicle movement to prevent dust from leaving the site and from exceeding the APCD's limit of 20% opacity for greater than 3 minutes in any 60-minute period. When using water, this includes wetting down areas as needed but at least once in the late morning and after work is completed for the day. Increased watering frequency should be required when sustained wind speed exceeds 15 mph. Reclaimed water should be used whenever possible. However, reclaimed water should not be used in or around crops for human consumption.
- Onsite vehicle speeds shall be no greater than 15 miles per hour when traveling on unpaved surfaces.
- Install and operate a track-out prevention device where vehicles enter and exit unpaved roads onto paved streets. The track-out prevention device can include any device or combination of devices that are effective at preventing track out of dirt such as gravel pads, pipe-grid track-out control devices, rumble strips, or wheel-washing systems.
- If importation, exportation, and stockpiling of fill material is involved, soil stockpiled for more than one day shall be covered, kept moist, or treated with soil binders to prevent dust generation. Trucks transporting fill material to and from the site shall be tarped from the point of origin. The amount of excavated material or waste materials stored at the site should be minimized.
- Minimize the amount of disturbed area. After clearing, grading, earthmoving, or excavation is completed, or if previously graded areas remain inactive for more than 10 calendar days, treat the disturbed area by watering, OR using roll-compaction, OR revegetating or hydroseeding, OR by applying non-toxic soil binders until the area is paved or otherwise developed so that dust generation will not occur. All roadways, driveways, sidewalks etc. proposed to be paved should be completed as soon as possible.
- Schedule clearing, grading, earthmoving, and excavation activities during periods of low wind speed to the extent feasible. During periods of high winds (>25 mph) clearing, grading, earthmoving, and excavation operations shall be minimized to prevent fugitive dust created by onsite operations from becoming a nuisance or hazard.
- The contractor or builder shall designate a person or persons to monitor and document the dust control program requirements to ensure any fugitive dust emissions do not result in a nuisance and to enhance the implementation of the mitigation measures as necessary to prevent transport of dust offsite. Their duties shall include holiday and weekend periods when work may not be in progress.

All measures required by the Lead Agency shall be shown on grading and building plans and/or as a separate information sheet listing the conditions of approval to be recorded with the map prior to grading/building permit issuance and/or map recordation. Conditions shall be adhered to throughout all grading and construction periods. The name and telephone number of a dust control contact shall be provided to the APCD prior to grading/building permit issuance and/or map clearance. The Lead Agency shall ensure measures are on project plans and/or recorded with maps. The Lead Agency staff shall ensure compliance onsite. APCD inspectors will respond to nuisance complaints.

A6.5

ATTACHMENT B
CONSTRUCTION DIESEL PARTICULATE AND NO_x EMISSION REDUCTION MEASURES

Particulate emissions from diesel exhaust are classified as carcinogenic by the state of California. The following is a list of regulatory requirements and control strategies that should be implemented to the maximum extent feasible.

The following measures are required by state law:

- **Portable Engines:** All portable diesel-powered construction equipment greater than 50 brake horsepower (bhp) shall be registered with the state's portable equipment registration program (PERP)¹ OR shall obtain an APCD permit.
- **Off-Road Equipment:** Fleet owners of diesel-fueled mobile construction equipment greater than 25 hp are subject to the California Air Resource Board (CARB) In-Use Off-Road Diesel-Fueled Fleets Regulation². All off-road vehicles subject to this regulation must use renewable diesel fuel, with some limited exceptions.
- **Diesel Trucks:** Fleet owners of on-road diesel-fueled heavy-duty trucks and buses are subject to CARB's Heavy-Duty (Tractor-Trailer) Greenhouse Gas Regulation, Periodic Smoke Inspection Program (PSIP), the Statewide Truck and Bus Regulation, and the Advanced Clean Fleets Regulation to reduce emissions from trucks and buses.³
- **Idling:** Drivers of diesel-fueled commercial motor vehicles are subject to the Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling.⁴ Idling restrictions for off-road equipment are set forth in CARB's In-Use Off-road Diesel-Fueled Fleets Regulation.

The following measures are recommended:

- At a minimum, off-road diesel equipment should be equipped with engines compliant with, or certified to meet or exceed, CARB Tier 4 emission standards. Where available, off-road construction equipment should be zero-emission. Alternative/renewable fuels such as compressed natural gas (CNG), liquefied natural gas (LNG), or propane should be utilized to the maximum extent feasible when zero-emission is not available. Electric auxiliary power units should be used. The Lead Agency should require commitments to Tier 4 and/or zero-emission equipment in applicable bid documents, purchase orders, and contracts; successful contractors should demonstrate the ability to supply the compliant construction equipment for use prior to any ground-disturbing and construction activities.
- On-road heavy-duty equipment with model year 2014 or newer engines, or powered by zero- or near zero-emission technology, should be used whenever feasible.
- All portable generators should be powered by a source other than diesel or gasoline (i.e., battery, natural gas, propane, etc.)
- All construction equipment should be maintained in tune per the manufacturer's specifications.
- The number of construction equipment operating simultaneously should be minimized through efficient management practices to ensure that the smallest practical number is operating at any one time.
- Proposed truck routes should minimize impacts to residential communities and sensitive receptors.
- Construction staging areas should be located away from sensitive receptors such that exhaust and other construction emissions do not enter the fresh air intakes to buildings, air conditioners, and windows. Construction activity schedules and hours should be planned and adjusted as feasible to maximize distance from existing sensitive receptors and minimize exposure to air pollution.

Prior to grading/building permit issuance and/or map recordation, all measures required by the Lead Agency shall be shown as conditions of approval on grading/building plans, and/or on a separate sheet to be recorded with the map. Conditions shall be adhered to throughout grading and construction periods. The contractor shall retain onsite the Certificate of Compliance for CARB's In-Use Regulation for Off-Road Diesel Vehicles and have it available for inspection. The Lead Agency shall ensure measures are on project plans and/or recorded with maps and ensure compliance onsite. APCD inspectors will respond to nuisance complaints.

¹ <https://ww2.arb.ca.gov/our-work/programs/portable-equipment-registration-program-perp>

² <https://ww2.arb.ca.gov/our-work/programs/use-road-diesel-fueled-fleets-regulation>

³ <https://ww2.arb.ca.gov/our-work/programs/truckstop-resources/truckstop>

⁴ <https://ww2.arb.ca.gov/our-work/programs/atcm-to-limit-vehicle-idling/about>



ATTACHMENT C
OPERATIONAL DIESEL PARTICULATE AND NO_x EMISSION REDUCTION MEASURES

Particulate emissions from diesel exhaust are classified as carcinogenic by the state of California. The following is a list of regulatory requirements and control strategies that should be implemented to the maximum extent feasible.

The following measures are required by state law:

- **Portable Engines:** All portable diesel-powered construction equipment greater than 50 brake horsepower (bhp) shall be registered with the state's portable equipment registration program (PERP)¹ OR shall obtain an APCD permit.²
- **Diesel Trucks and Buses:** Fleet owners of diesel-fueled heavy-duty trucks and buses are subject to the California Air Resources Board (CARB)'s Heavy-Duty (Tractor-Trailer) Greenhouse Gas Regulation, Periodic Smoke Inspection Program (PSIP), the Statewide Truck and Bus Regulation, the Innovative Clean Transit Rule, and the Advanced Clean Fleets Regulation to reduce emissions from trucks and buses.³
- **TRUs:** The Airborne Toxic Control Measure (ATCM) for In-Use Diesel-Fueled Transportation Refrigeration Units (TRU), TRU Generator Sets, and Facilities Where TRUs Operate⁴ requires applicable facility owners or owner/operators to register their facility with CARB and ensure compliance of TRUs operating onsite.
- **Idling:** Drivers of diesel-fueled commercial motor vehicles are subject to the Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling Drivers.⁵
- **Schools:** Diesel buses and other commercial vehicles are subject to the ATCM to Limit School Bus Idling and Idling at Schools.⁶
- **Logistics Facilities:** New or expanded logistics facilities must meet the standards, and design and siting requirements of California Assembly Bill 98 (AB 98) to regulate warehousing and associated trucking activities starting in 2026.⁷

The following measures are recommended as applicable:

- Require (or incentivize) zero-emission trucks for facility operations to the maximum extent feasible. At a minimum, all heavy-duty trucks entering, or on, the project site should be model year 2014 or later.
- Utilize zero-emission off-road service equipment (yard equipment, forklifts, pallet jacks etc.) within the site.
- Install electric charging infrastructure to support zero-emission vehicles and equipment.
- Install vegetative walls or other effective barriers that separate loading docks and people living or working nearby.⁸
- Restrict diesel trucks and support equipment from idling longer than two minutes whilst on site. Condition a "no idle" zone at locations where there is the potential for a significant health risk.
- Require all emergency generators to be powered by a source other than diesel or gasoline (e.g. battery, natural gas, propane, etc.).
- **TRU Use:** Equip all loading/unloading docks and trailer spaces with electrical hookups for trucks or auxiliary power units. Require TRUs entering the project site to be plug-in capable to the maximum extent feasible. Utilize zero-emission refrigeration technology, such as all-electric plug-in TRUs, hydrogen fuel cell transport refrigeration, and cryogenic transport refrigeration. Limit onsite TRU diesel engine runtime to no longer than 15 minutes.

All measures required by the Lead Agency shall be made enforceable for the project through conditions of approval, incorporation in the project description or a Mitigation Monitoring and Reporting Program, or other enforceable mechanism. The Lead Agency shall ensure compliance onsite. APCD inspectors will respond to nuisance complaints.

¹ <https://ww2.arb.ca.gov/our-work/programs/portable-equipment-registration-program-perp>

² In some situations, portable and/or temporary engines, require a District permit irrespective of PERP-registration status. See www.ourair.org/wp-content/uploads/PERPfag.pdf for more information on the operation of PERP-registered engines at stationary sources.

³ More information on CARB's on-road regulations available at <https://ww2.arb.ca.gov/our-work/programs/truckstop-resources/truckstop>

⁴ <https://ww2.arb.ca.gov/our-work/programs/transport-refrigeration-unit/applicable-facility-requirements>

⁵ <https://ww2.arb.ca.gov/our-work/programs/atcm-to-limit-vehicle-idling/about>

⁶ <https://ww2.arb.ca.gov/resources/documents/school-bus-idling-and-idling-schools>

⁷ For legislative text on AB 98 see https://leginfo.legislature.ca.gov/faces/billTextClient.xhtml?bill_id=202320240AB98

⁸ Effectiveness of Sound Wall-Vegetation Combination Barriers as Near-Roadway Pollutant Mitigation Strategies (2017). Available at <https://ww2.arb.ca.gov/sites/default/files/classic/research/apr/past/13-306.pdf>

Letter A6

COMMENTER: Carly Barham, Planning Division, Santa Barbara County Air Pollution Control District

DATE: December 24, 2025

Response A6.1

The commenter summarized the proposed project. This comment is acknowledged.

Response A6.2

The commenter states that the Draft Environmental Impact Report (EIR) Mitigation Measure AQ-1 must be clearly included in the Mitigation Monitoring and Reporting Program (MMRP) with enforceable mechanisms. They also ask for clarification of Mitigation Measure AQ-1's engine standards, requesting it specify "2014-or-newer on-road truck engines" and seek confirmation on whether Tier 4 off-road engines apply to construction or operations.

Mitigation Measure AQ-1 is included in Chapter 4, *Mitigation Monitoring and Reporting Program*, of this Final EIR, and has been revised per the commenter's request.

The air quality analysis completed for the IS (IS/EIR Appendix A), for the project relied on a mixture of Tier 4 off-road equipment and average equipment as a part of the client provided construction list. To ensure this requirement is implemented as part of the project, compliance with Tier 4 equipment standards shall be incorporated as a condition of project approval. Because the use of Tier 4 equipment is already required by state regulations and incorporated into the project description, no additional construction mitigation measures are required. No further response is required.

In response to this comment, Mitigation Measure AQ-1 on page 1-9 of the Draft EIR has been revised as follows:

AQ-1 Line-Haul Trucks Requirement. The proposed project owner or operators shall require the use of line-haul trucks that meet standards for ~~Tier 4 Standards for off-road diesel engines~~ on-road trucks with model year 2014 or newer engines.

Response A6.3

The commenter states that the Draft EIR does not include a project-level greenhouse gas (GHG) analysis and relies on consistency with the 2022 CARB Scoping Plan and 2023 RTP/SCS, which they contend do not qualify as CEQA-qualified GHG reduction plans under Section 15183.5. They request that the City ensure the project's GHG emissions are adequately disclosed, analyzed, and mitigated.

The City of Santa Maria does not have a Climate Action Plan (CAP) or similar document and therefore there are no numeric thresholds or local verified CAP with which to compare emissions for determining significance. Santa Barbara County has a CAP, however that is unincorporated County only and does not include the City emissions, therefore it is not directly applicable to the Incorporated areas. Without conducting a City-wide inventory, the project itself cannot come up with an appropriate numeric threshold. Under CEQA, significance may be evaluated based on consistency with applicable State and regional GHG reduction plans and policies when local thresholds or CAPs are currently not available. Accordingly, the IS evaluates GHG impacts based on consistency with State and regional plans, such as the 2022 Scoping Plan, which establishes the framework that future local CAPs and numeric thresholds would be expected to implement. Therefore, the project implemented the use of consistency with State and Regional GHG reduction plans for the determination of both CEQA impact questions. Consistency with the plans that would be used to develop local CAPs and/or numeric thresholds would make the proposed project consistent potentially established verified plans and/or numeric thresholds. Further, the methodology used for the Initial Study is consistent with the methodology used in the City's General Plan EIR. No further response is required.

Response A6.4

The commenter states that if contaminated soils are discovered during oil well re-abandonment or earth-moving activities, the district must be contacted to determine permit requirements. They note that permits are required for soil vapor extraction and excavation of more than 1,000 cubic yards of contaminated soil. They also state that proof of permits or exemptions should be provided before grading/building permits are issued.

As discussed on page 2-13 of the Draft EIR, the existing oil well is planned to be re-abandoned in accordance with all current CalGEM requirements and standards. While it is not anticipated that contaminated soils would be encountered, if contaminated soils are to be discovered during the well re-abandonment or other earth-moving activities, the Air District shall be consulted and required permits shall be obtained prior to the continued work as is required by Santa Barbara County Air Pollution Control District (SBCAPCD). No further response is required.

Response A6.5

The commenter states that the technical report assumes off-road equipment ≥ 50 HP will use Tier 4 Final engines and recommends enforcing this through permit conditions. They also recommend implementing fugitive dust and diesel exhaust reduction measures provided in Attachments A and B of the provided letter.

The air quality analysis provided as part of the IS (IS/EIR Appendix A) indicated that the proposed project would use Tier 4 equipment for all equipment greater than 50 horsepower as part of the project design. To ensure this is implemented as part of the project, this would be incorporated as a condition of approval for the project. No construction mitigation was required as part of the proposed project. The commenter recommended implementing Fugitive Dust Control Measures and Construction Diesel Particulate and NO_x Emission Reduction Measures. Fugitive Dust Control Measures from (SBCAPCD) are required under District Rules 302, 303, and 345. The recommended exhaust emissions reduction measures are based on State regulatory requirements and laws. As the recommended measures are enforceable through existing rules and regulations, the proposed project would be required to implement them and therefore they are not included as mitigation. These measures therefore would be implemented as part of the proposed project. To ensure that these measures are adequately implemented, the requirement to follow the SBCAPCD's Fugitive Dust Control Measures and Construction Diesel Particulate and NO_x Emission Reduction Measures shall be incorporated as a condition of approval. No further response is required.

Response A6.6

The commenter states that diesel exhaust is carcinogenic and recommends incorporating all feasible emission reduction measures beyond AQ-1. They suggest measures such as zero-emission trucks and equipment, charging infrastructure, and anti-idling zones provided in Attachment C of the provided letter.

With implementation of Mitigation Measure AQ-1, operational emissions were reduced to less than significant levels. Therefore, additional mitigation is not required. However, the recommended Operational Diesel Particulate and NO_x Emission Reduction Measures are all measures that are required under state law. Therefore, these measures would be implemented as part of project operations. To ensure that these measures are adequately implemented, the requirement to follow the SBCAPCD's Operational Diesel Particulate and NO_x Emission Reduction Measures shall be incorporated as a condition of approval. No further response is required.

Response A6.7

The commenter states that the proposed diesel-powered emergency fire pump requires a District Authority to Construct permit and a Health Risk Assessment (HRA). They note that the district will not issue a permit if the assessment shows significant risk and will review CEQA adequacy during permit issuance.

The proposed project would include a generator for the emergency fire pump. The implementation of the generator would, as stated, require a permit through the SBCAPCD which requires an HRA. An HRA is conducted for the permit process based on generator specific information and installation location. At this time, the exact generator that would be used and the exact location of the generator are unknown; therefore, a HRA cannot be accurately conducted to satisfy the permitting requirements. Nevertheless, the environmental analysis conservatively evaluated emissions associated with an emergency fire pump generator. As it is understood that the implementation of the generator would not be allowed if there is a health risk above regulatory requirements, the installation of the generator was found to be less than significant. Prior to the installation and operation of the generator, the project applicant would be required to obtain all applicable SBCAPCD permits, including preparation and approval of an HRA, and to demonstrate compliance with all applicable health-based thresholds and regulatory standards. If the generator could not meet applicable requirements, the permit would not be issued, or conditions would be imposed to ensure compliance. To ensure implementation of these requirements, a condition of approval shall require the applicant to obtain all required air district permits and to comply with all applicable SBCAPCD rules and regulations prior to installation and operation of the generator. With these safeguards in place, potential health risks would be addressed through the established regulatory process. No further response is required.

Letter A7



Re: Impact of traffic to schools on or near Stowell Rd.

From John Hollinshead <johnhollinshead@smbd.net>

Date Mon 12/29/2025 7:20 PM

To Cody Graybehl <cgraybehl@cityofsantamaria.org>

*** EXTERNAL EMAIL: Please use caution when opening links or attachments.***

Hello Mr. Graybehl,

Please accept my apologies for this late submission. I have been caring for my mother and time got away from me. I have informed the SMBSD staff of my concerns around the project, but they are on break and likely have not responded. Please accept this letter as my input as both Board Trustee for SMBSD and a concerned citizen in the immediate vicinity of Stowell Rd.

The proposed Amazon Fulfillment Center location over 2.5 miles from US Hwy 101 is out of line in its adverse effects on neighborhoods next to our local schools and safe arrival of our students to their respective area campuses.

As to the traffic and safety effects upon SMBSD campuses, please consider the proximity and adverse effects upon Sanchez school, Adam School (two blocks off Stowell), Miller School (two blocks off Stowell on Miller Street), and a school yet to be built just adjacent to Depot and Stowell. There is significant crosswalk pedestrian traffic in the form of students and their families making their way to these respective schools. In addition there is substantial vehicle and bus traffic to those schools as well as those attending Liberty and Jimenez schools. The existing challenges of those crossings and the crosswalk associated with SMHS present significant safety concerns on our part, namely volume of student pedestrians vs. vehicle density. At current the density of traffic is such that a significant number of vehicles moving to the east on Stowell choose to avoid constricted travel on northbound Miller and instead divert through Speed street to Camino Colegio. I imagine this happens to the streets in the area of Depot, Blosser, Broadway and College. My wife and neighbors have born witness to the increasingly traffic on Speed street when children are present en route to school. The existing traffic density presents significant safety concerns and difficulties.

The significant increase in density and the ensuing safety issues it brings is also unacceptable to our neighbors and us. We have repeatedly witnessed increase traffic when Stowell is backed up and traffic self diverts to Speed. This traffic often drives at excessive speed and carelessly.

I commute to work on Stowell Road. Upon my return home I turn onto westbound Stowell off College. With the increased packing shed traffic I have nearly been t-boned several times by semis running a red light at this intersection. No change in timing of lights will mitigate this. The increase vans and semis associated with Amazon will most certainly increase the likelihood of accidents and near misses.

I understand that as a planner you have limited control of some things that have been imposed upon you from the past. The way Santa Maria often works is that families who own property are accommodated by zoning as the plan from 1994 has done for the Bognuda Trust. I can only assume so, given the poor proximity to highway entry and exit is terrible for "efficiency". A choice closer to the freeway and east of it would certainly make more sense in this regard.

The scenario for Amazon is well established in placement of "Fulfillment" centers. Pick a city with a primarily low socio-economic populous and significant multi-zoned land. The adjacent land to the

A7.1

A7.2

A7.3

proposed site is was noted to be Santa Barbara County land. Good luck getting Santa Barbara County to allow this kind of set up. Additionally there was no overtures made to Santa Barbara, San Luis Obispo, or any cities in between. It feels obvious as to why Amazon ultimately chose SM and not our neighbors to the north or south. The warehouse jobs noted are susceptible to Automation and no significant ongoing revenue was noted, so the longterm benefit is limited.

I don't believe this building is a safe or desirable addition to our city in its current iteration and placement. Please revoke this plan on the grounds that that stresses and safety concerns it imposes upon Santa Maria are unacceptable.

Thank you for your consideration in this matter.

Regards,

John Hollinshead
johnhollinshead@smbd.net
Santa Maria Bonita School Board
Trustee District 5

On Thu, Dec 18, 2025 at 4:22 PM John Hollinshead <johnhollinshead@smbd.net> wrote:

Hello Dr. McDuffie and Mr. Graybehl,

I spoke on behalf of myself and the SMBSD at a recent planning commission study session that was centered on a proposed Amazon distribution site on West Stowell Rd, 2.8 miles west of Hwy US 101. I expressed my dismay as a board member that we had not been privy to this development or asked how the traffic associated with it on Stowell would have adverse affects on our sites and the safe timely arrival of our students. There are multiple sites on/adjacent to Stowell and just removed a block or two. In addition the arteries off Stowell feed additional schools. Stowell is a historically heavily impacted road and has very limited capacity to change its volume physically. Currently the chief remediation of negative impact would involve attempting to better time traffic signals through updated new hardware and software at main thoroughfares. Needless to say, as a resident of Speed street, I have currently seen the diversion of traffic on my street that is a result of daily ebbs and flows of traffic density on Stowell, Broadway, and Miller. It is not enjoyable as a resident to have heavy and sometimes loud (trucks) travel on our residential street to bypass build up on the aforementioned roads, nor is it safe for our students and family as they make their way to and from their respective sites. There are multiple start times depending on our sites and the Santa Maria High School.

Mr. Graybehl was kind enough to reach out after the study session to express his apologies for the school district not having been notified of this development and thus included in providing feedback and questions about its impact upon us. He asked in turn to know the contact information for whomever would be best to contact for current and future communication of these projects, which affect our schools and their attendees/families. Hopefully this email can provide a jumping off point for providing that person(s) name(s) and communicating the impacts that this and future projects would have on our District. I know the city is working

toward making this a more livable and safe place to call home. The governance team needs to balance the immediate need for funding and jobs with the long term safety, housing, and possible adverse livability impacts of our city to perpetuate that goal.

Thank you both for your time and consideration in this community matter.

Best regards,

John Hollinshead

johnhollinshead@smbsd.net

Santa Maria Bonita School Board

Trustee District 5

Letter A7

COMMENTER: John Hollinshead, Trustee District 5, Santa Maria Bonita School District

DATE: December 29, 2025

Response A7.1

The commenter states they have informed SMBSD staff of their concerns regarding the project, but district staff are currently on break and may not yet have had an opportunity to respond. The commenter requests that this letter be accepted as their input both in their capacity as an SMBSD Board Trustee and as a resident living in the immediate vicinity of Stowell Road.

The comment is acknowledged. No further response is required.

Response A7.2

The commenter states that the proposed fulfillment center will have adverse effects on neighborhoods and the safe arrival of students to nearby schools. The commenter identifies specific schools impacted: Sanchez, Adam, Miller, a future school near Depot and Stowell, and notes significant pedestrian and vehicle traffic at crosswalks, including Santa Maria High School. The commenter expresses concern about existing traffic congestion on Stowell and diversion of vehicles onto residential streets like Speed Street, creating safety hazards for children and families. They report witnessing speeding and careless driving in these areas. The commenter shares personal experiences of near accidents with semis running red lights at Stowell and College, warning that additional delivery vans and semis will increase accident risks.

Refer to Response to comment A3.2. The project would not substantially increase roadway hazards or result in inadequate emergency access (See Impacts TRA-3 and TRA-4 of the Draft EIR), with impacts determined to be less than significant without mitigation. Roadway safety would be maintained for all existing users, including pedestrians, bicyclists, and school-age users. Additionally, through the Conditional Use Permit process using Conditions of Approval, the project would be required to make improvements to existing infrastructure impacted by the project that will include transportation improvements. The exact improvements will be included in the staff report to the Planning Commission. Additionally, project van delivery drivers would use a trip route application based on real-time traffic data to avoid congested routes and identify the most efficient route for delivery of packages. Van delivery drivers would use residential streets only when delivering to a residence.

Response A7.3

The commenter criticizes the site selection, suggesting it is poorly located for efficiency and chosen because Santa Maria has a low socio-economic population and multi-zoned land. They note adjacent land is in Santa Barbara County, which likely would not allow such development.

As discussed on page 3-2 of the Draft EIR, the project site is designated Heavy Commercial/Manufacturing (HCM) under the City of Santa Maria General Plan and zoned PD/CM-AG (Planned Development / Commercial Manufacturing – Agriculture Overlay) within the adopted West Stowell Specific Plan. These designations allow for warehouse, distribution, and related industrial uses. The City has the authority to review projects submitted for development but does not have the authority to require applicants to develop specific properties.

Response A7.4

The commenter expresses concern that the school district was not informed about the project or consulted on potential traffic impacts to school sites along or near Stowell Road, which could affect the safe timely arrival of students.

This comment is acknowledged. The City provided formal notice to the school district during the Notice of Preparation (NOP) review period. City staff received certified mail receipts from multiple school district representatives confirming delivery of the NOP materials. The certified mailing and distribution list used to notify school district representatives were included in the City's correspondence to the school district. No further response is required.

California Department of Transportation

CALTRANS DISTRICT 5
50 HIGUERA STREET | SAN LUIS OBISPO, CA 93401-5415
(805) 549-3101 | FAX (805) 549-3329 TTY 711
www.dot.ca.gov



December 29, 2025

SCH #2025080640
SB/166/6.019

Cody Graybehl
Senior Planner
City of Santa Maria
110 South Pine Street Suite 101
Santa Maria, CA 93442

Re: Package Delivery Warehouse Planned Development Permit Draft Environmental Impact Report (DEIR)

Dear Mr. Graybehl:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the Package Delivery Warehouse Planned Development Permit Draft Environmental Impact Report (DEIR).

A8.1

Caltrans' Local Development Review (LDR) branch reviews local land use projects and plans to ensure consistency with the State of California mission and planning priorities. The following comments are based on our review of the November 2025 DEIR.

Traffic Operations Comments

Alternate routes proposed in Appendix C Traffic Impact Study (TIS) dated May 2025 include directing traffic from Stowell Road to State Route 166 (SR 166). SR 166 in this area already experiences significant congestion during peak hours, especially at the intersection with Blosser Road. The project should not direct additional traffic onto this road if Stowell Road is experiencing congestion. Caltrans recommends that the City of Santa Maria provide further comments on whether the other proposed alternate routes, including Battles Road, Betteravia Road, and Miller Street, also experience congestion.

A8.2

Caltrans recommends including calculation of vehicle miles traveled (VMT) based on the Institute of Transportation Engineers (ITE) Trip Generation Codes, as to reinforce that the calculated VMT already included in the TIS are a conservative estimate. Please revise Transportation Section 4.1.2 of the DEIR to clarify Caltrans has updated its

A8.3

guidelines via the Transportation Impact Study Guide (2020) to use VMT as its primary metric for determining a project's transportation impacts.

A8.3

Alternatives Section 6.4 states that Alternative 2 is the environmentally superior alternative but "may not fully meet the operational needs of the applicant." Further clarify which alternative is planned to be implemented. If any alternatives, besides the No-Build Alternative and Reduced Size Alternative enter consideration, verify that the VMT analysis & TIS documents account for the new alternatives.

A8.4

Should you have any questions or need further clarification on the items discussed above, please contact me at (805) 888-1508 or email christopher.bjornstad@dot.ca.gov.

A8.5

Sincerely,

Christopher Bjornstad

Chris Bjornstad
Associate Transportation Planner
District 5 Development Review

CC:

Veronica Lezama, Branch Chief – Regional Planning &
Local Development Review (South)

Letter A8

COMMENTER: Chris Bjornstad, Associate Transportation Planner, District 5 Development Review, California Department of Transportation

DATE: December 29, 2025

Response A8.1

The commenter summarized Caltrans local development review process. This comment is acknowledged.

Response A8.2

The commenter states the TIS includes directing traffic from Stowell Road to SR 166, which already experiences significant congestion, especially at Blosser Road. The commenter advises against adding traffic to SR 166 if Stowell Road is congested and requests clarification on congestion levels for other alternate routes (Battles Road, Betteravia Road, Miller Street).

Refer to Response to comment A3.2.

Response A8.3

The commenter states that VMT calculations should be based on ITE Trip Generation Codes to confirm conservative estimates. The commenter states that Caltrans uses VMT as the primary metric for transportation impacts per its 2020 Transportation Impact Study Guide and recommends revising the Draft EIR Section 4.1.2 to reflect this.

Page 4.1-5 of the Draft EIR is revised to reflect the 2020 guidance:

In December 2018, OPR issued a Technical Advisory on Evaluating Transportation Impacts in CEQA (OPR 2018). The technical advisory contains technical recommendations regarding assessment of VMT, thresholds of significance, and mitigation measures. The technical advisory suggests a significance threshold for VMT that is based on state mandated GHG emission reduction targets. The technical advisory recommends a quantitative per capita or per employee VMT that is 15 percent below that of existing development as a possible threshold of significance that would comply with the state's long-term climate goals. In 2020, Caltrans updated its guidelines via the Transportation Impact Study Guide (2020) to use VMT as its primary metric for determining a project's transportation impacts.

The Draft EIR uses City of Santa Maria VMT thresholds of significance as identified on page 4.1-7. VMT is calculated using daily traffic volumes, and the delivery center land use produces substantially higher daily volumes than a warehouse of the same square footage. If the ITE industrial land use category had been used, VMT would have been lower. For example, a 169,000-square-foot warehouse would generate approximately 166 daily trips, whereas the user-supplied land-use data for the proposed delivery center results in an estimated 2,128 daily trips. This represents a more accurate calculation of VMT for the project. No further response is required.

Response A8.4

The commenter states that Alternative 2 is identified as environmentally superior but may not meet operational needs. The commenter requests clarification on which alternative will be implemented. The commenter states that if new alternatives are considered, the VMT analysis and TIS documents should account for them.

Section 15126.6 of the *CEQA Guidelines* requires a Draft EIR to examine a range of reasonable alternatives to the proposed project that would attain most of the basic project objectives but would avoid or substantially lessen the significant adverse impacts. It also requires the identification of an environmentally superior alternative along with a “no project” alternative. Although an identified alternative can be selected as the project to be approved, in this case the proposed project is being requested to be approved by the Planning Commission. The alternatives chapter, starting on page 6-1, provides an assessment of VMT for those alternatives.

Response A8.5

The commenter provided their contact information. This comment is acknowledged. No further response is required.

Letter O1

ADAMS BROADWELL JOSEPH & CARDOZO

A PROFESSIONAL CORPORATION

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AIDAN P. MARSHALL
ALAUURA R. MCGUIRE
ISABEL TAHIR

Of Counsel

DANIEL L. CARDOZO
MARC D. JOSEPH

December 15, 2025

Via Email and U.S. Mail

Chenin Dow, Director
Community Development Department
110 South Pine Street, Suite 101
Santa Maria, CA 93458
Email: cdow@cityofsantamaria.org

Patti Rodriguez, City Clerk
Clerk/ Records Division
110 E. Cook Street
Santa Maria, CA 93454
Email: cityclerk@cityofsantamaria.org

Via Email Only:

Cody Graybehl, Senior Planner
Email: cgraybehl@cityofsantamaria.org

Re: Request for Immediate Access to Documents Referenced in the Draft Environmental Impact Report – Seefried Package Delivery Planned Development Permit Project (SCH No. 2025080640)

Dear Ms. Dow, Ms. Rodriguez, and Mr. Graybehl:

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 Draft Environmental Impact Report (“DEIR”) prepared for the Seefried Package Delivery Warehouse Planned Development Permit Project (SCH No. 2025080640) (“Project”), proposed by Seefried Industrial Properties, Inc. (“Applicant”). *This request excludes a copy of the DEIR. This request also excludes any documents that are currently available on the City of Coachella website, as of today’s date.*¹

The Project proposes to develop a 244,418 square-foot package delivery warehouse building and associated infrastructure and related improvements. The 32-acre Project site is located at 1680 West Stowell Road, Santa Maria, California 93458 (APNs 117-820-012 and 117-820-013).

¹ Accessed <https://www.cityofsantamaria.org/services/departments/community-development/planning-division/planning-policies-and-regulations/environmental-impact-reports> on December 15, 2025.

O1.1

December 15, 2025

Page 2

Our request for ***immediate access*** to all documents referenced in the DEIR 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

O1.1

Please use the following contact information for all correspondence:

U.S. Mail

Rachel Levine
Adams Broadwell Joseph & Cardozo
601 Gateway Boulevard, Suite 1000
South San Francisco, CA 94080-7037

Email

rlevine@adamsbroadwell.com

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

Sincerely,



Rachel L. Levine
Legal Assistant

RLL:acp

² See Public Resources Code § 21092(b)(1) (stating that “all documents referenced in the draft environmental impact report” shall be made “available for review”); 14 Cal. Code Reg. § 15087(c)(5) (stating that all documents incorporated by reference in the EIR . . . shall be readily accessible to the public”); see also *Vineyard Area Citizens for Responsible Growth, Inc. v. City of Rancho Cordova* (2007) 40 Cal.4th 412, 442, as modified (Apr. 18, 2007) (EIR must transparently incorporate and describe the reference materials relied on in its analysis); *Santiago County Water District v. County of Orange* (1981) 118 Cal.App.3rd 818, 831 (“[W]hatever is required to be considered in an EIR must be in that formal report. . .”), internal citations omitted.

Letter 01

COMMENTER: Rachel L. Levine, Legal Assistant, Adams Broadwell Joseph & Cardozo

DATE: December 15, 2025

Response 01.1

The commenter notes they 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 Draft EIR prepared for the proposed project.

The City has provided all documents referenced, incorporated by reference, and relied upon in the Draft EIR document. The City added all documents requested to their website for downloading on or near 12/30/2025. The requested information on the project can be accessed at <https://www.cityofsantamaria.org/services/departments/community-development/planning-division/planning-policies-and-regulations/environmental-impact-reports>. No further response is required.

Letter O2



Stowell Rd Package Delivery Warehouse Planned Development Permit (PD2024-0003)

From claire.wineman@grower-shipper.com <claire.wineman@grower-shipper.com>
Date Mon 12/15/2025 12:06 PM
To Cody Graybehl <cgraybehl@cityofsantamaria.org>
Cc Frank Albro Jr. <falbro@cityofsantamaria.org>; Mark Mueller <mmueller@cityofsantamaria.org>; Thomas Watson <twatson@cityofsantamaria.org>

*** EXTERNAL EMAIL: Please use caution when opening links or attachments.***

Good afternoon,

On behalf of the Grower-Shipper Association of Santa Barbara and San Luis Obispo Counties, I would like to respectfully request an extension of the Stowell Rd Package Delivery Warehouse Planned Development Permit (PD2024-0003) Draft EIR comment deadline to at least Friday, January 16. This modest deadline extension would allow the Association and the public to consider the information raised at the upcoming Planning Commission Study Session to understand what is being proposed and to prepare comments accordingly, especially considering upcoming holiday closures.

O2.1

Furthermore, we understand that there may be a potential discrepancy between the project description and materials currently out for review and what is actually being proposed. If so, this fatal flaw must be addressed with subsequent time for public review. We respectfully request adequate time to review an accurate project description and supporting technical materials in preparing public comment on the Draft EIR.

O2.2

Thank you for your consideration of this reasonable and modest request and we look forward to your prompt reply!

Sincerely,
Claire

Claire Wineman
President
Grower-Shipper Association
of Santa Barbara and San Luis Obispo Counties
Mailing Address-NEW:
PO Box 309
Santa Maria, CA 93456
Physical Address:
534 E Chapel St
Santa Maria, CA 93454
Phone: 805.343.2215
Cell: 805.868.8245
Email: claire.wineman@grower-shipper.com

Letter 02

COMMENTER: Claire Wineman, President, Grower-Shipper Association of Santa Barbara and San Luis Obispo Counties

DATE: December 15, 2025

Response 02.1

The commenter requests to extend the Draft EIR comment deadline for the project to at least Friday, January 16 to allow time for the Association and public to review information from the upcoming Planning Commission Study Session and prepare comments, especially given holiday closures.

The City acknowledged this request for an extension of the Draft EIR comment deadline. The comment period was extended to Friday, January 16, 2026, as requested. No further response is required.

Response 02.2

The commenter notes a possible discrepancy between the project description and materials currently out for review versus what is actually proposed. If confirmed, this should be corrected and additional time for public review should be provided.

The City has reviewed the Draft EIR regarding a potential discrepancy between the project description and materials currently under review and has not identified any discrepancy. In follow-up discussions with the commenter, it was clarified that their concern relates to the identification of off-site improvements, which were believed not to be included in the project description. The IS circulated with the NOP (published August 14, 2025) identified these elements. As discussed on page 5, under the heading *Site Circulation and Parking*, the IS states:

Access to the site would be provided via three unsignalized driveways (see Figure 3). The westernmost driveway would provide access for all line-haul trucks with vans and employees entering the site via the central and easternmost driveways, which would provide access to parking lots to the north, west, and east of the main building. On-site improvements would involve parking lot striping. Off-site circulation improvements would include installation of parking lot striping, two east bound travel lanes, a bike lane, sidewalk, pedestrian barricade, and streetlights.

No further response is required.

Letter O3

BLUM, COLLINS & HO LLP
ATTORNEYS AT LAW
10250 CONSTELLATION BOULEVARD
SUITE 2300
LOS ANGELES, CALIFORNIA 90067
(213) 572-0400

December 23, 2025

Cody Graybehl
Senior Planner
City of Santa Maria
Planning Division, Community Development Department
110 South Pine Street, Suite 101
Santa Maria, CA 93454

Via Email to:
cgraybehl@cityofsantamaria.org

Subject: Comments on Package Delivery Warehouse Planned Development Permit EIR (SCH NO. 2025080640)

Dear Mr. Graybehl,

Thank you for the opportunity to comment on the Environmental Impact Report (EIR) for the proposed Package Delivery Warehouse Planned Development Permit Project. Please accept and consider these comments on behalf of Golden State Environmental Justice Alliance. Also, Golden State Environmental Justice Alliance formally requests to be added to the public interest list regarding any subsequent environmental documents, public notices, public hearings, and notices of determination for this project. Send all communications to Golden State Environmental Justice Alliance, P.O. Box 79222, Corona, CA 92877.

O3.1

1.0 Summary

The Project proposes the construction and operation of a 244,418 square-foot (sf) package delivery hub, including one (1) 169,104 square-foot (sf) distribution facility featuring a main warehouse, training room, break room, office space, fleet service center, and various support structures on an approximately 32-acre site at 1680 West Stowell Road. The other accessory structures include a Loading Awning - East (33,545 sf), Loading Awning - West (34,325 sf), Remote Restrooms (906 sf), Automated Vehicle Inspection Structures (1,545 sf), and the Fleet Service Center (4,993 sf). The Project requires a Planned Development Permit, including a modification to exceed the 35-foot building height limit to 45 feet.

O3.2

2.0 Project Description

The IS/EIR describes the Project operations as follows:

“Delivery warehouses operate 24/7 to support the delivery of packages to customer locations between 10:00 a.m. and 9:00 p.m. The main on-site facility would include delivery and distribution, office and processing uses, including shipping and receiving of packages. Approximately 34 line-haul trucks (semi-trailer trucks) would be expected to deliver packages to the warehouse each day.

The customer packages would be sorted by address groupings, assigned to the delivery routes, placed onto movable racks, and staged for dispatch. Delivery drivers would arrive at the delivery warehouse around 9:20 a.m. and begin queuing for loading. Up to 345 delivery vans would depart from the delivery warehouse at a rate of up to 72 vans per 20 minutes to facilitate a regulated traffic flow into the surrounding area. Approximately 8–10 hours after dispatch, delivery routes would be completed, and the vans would return to the station intermittently between 8:10 p.m. and 9:50 p.m. with all delivery vans staying onsite.

Parking for up to 990 passenger cars and vans would be available on-site. There would be 12 stalls at the loading dock to accommodate semi-trucks on the south side of the main facility. Parking for overnight fleet vehicles and drivers’ personal vehicles totaling 272 spaces would be available north of the building.”

1.4 Issues Not Studied in Detail in the EIR

1.4.3: Air Quality, 1.4.6: Energy, and 1.4.8: Greenhouse Gas Emissions

The Initial Study states that, “The Project is not a use permitted by right in the Commercial/Manufacturing/Agricultural Overlay Zoning District (PD/CM-AG) of the West Stowell Specific Plan.” Therefore, it is not accounted for in the AQMP, RTP/SCS, or the City’s General Plan. The EIR must be revised to state this information and include a finding of significance; it must also be recirculated for public review and comment. See also the attached air quality comments and analysis from SWAPE.

The IS/EIR does not include relevant environmental justice issues for analysis in reviewing potential impacts, including cumulative impacts from the proposed Project. This conflicts with CEQA Guidelines Section 15131 (c), which requires that “Economic, social, and particularly housing factors shall be considered by public agencies together with technological and environmental factors in deciding whether changes in a Project are feasible to reduce or avoid

O3.2

O3.3

O3.4

the significant effects on the environment identified in the EIR. If information on these factors is not contained in the EIR, the information must be added to the record in some other manner to allow the agency to consider the factors in reaching a decision on the Project.” According to CalEnviroScreen 4.0¹, CalEPA’s screening tool that ranks each census tract in the state for pollution and socioeconomic vulnerability, the proposed Project’s census tract (6083002402) ranks in the 80th percentile for overall pollution burden, meaning it is among the areas of the state most highly burdened by pollution.

The surrounding community bears the impact of multiple sources of pollution and is more polluted than average on several pollution indicators measured by CalEnviroScreen. The census tract ranks among the most severely impacted in several areas that impact water quality. The census tract ranks in the 100th percentile for groundwater threats. People who live near contaminated groundwater may be exposed to chemicals moving from the soil into the air inside their homes². Accordingly, the census tract ranks in the 53rd percentile for drinking water impacts, which indicates that it ranks with the worst quality drinking water in the state. Poor communities and people in rural areas are exposed to contaminants in their drinking water more often than people in other parts of the state³. The census tract also ranks in the 83rd percentile for impaired waters. Water pollution can harm wildlife habitats and change the number and types of plants and animals in the environment⁴. When fish and shellfish are contaminated, people who eat them can be exposed to toxic substances⁵.

The census tract also ranks in the 98th percentile for solid waste facility impacts. Solid waste facilities can expose people to hazardous chemicals, release toxic gases into the air (even after these facilities are closed), and chemicals can leach into soil around the facility and pose a health risk to nearby populations⁶. The census tract also ranks in the 96th percentile for hazardous waste facility impacts. Hazardous waste generators and facilities contribute to the contamination of air, water, and soil near waste generators and facilities can harm the environment as well as people⁷.

¹ https://experience.arcgis.com/experience/11d2f52282a54ccebca7428e6184203/page/CalEnviroScreen-4_0/

² OEHHHA Groundwater Threats <https://oehha.ca.gov/calenviroscreen/indicator/groundwater-threats>

³ OEHHHA Drinking Water <https://oehha.ca.gov/calenviroscreen/drinking-water>

⁴ OEHHHA Impaired Waters <https://oehha.ca.gov/calenviroscreen/indicator/impaired-water-bodies>

⁵ Ibid.

⁶ OEHHHA Solid Waste Facilities <https://oehha.ca.gov/calenviroscreen/indicator/solid-waste-sites-and-facilities>

⁷ OEHHHA Hazardous Waste Generators and Facilities <https://oehha.ca.gov/calenviroscreen/indicator/hazardous-waste-generators-and-facilities>

Further, the Project's census tract is a diverse community including 78% Hispanic, 2.5% African-American, and 4% Asian-American residents, who are especially vulnerable to the impacts of pollution. The community has a high rate of low educational attainment, meaning 93% of the census tract over age 25 has not attained a high school diploma. The community also has a high rate of poverty, meaning 83% of the households in the census tract have a total income before taxes that is less than the poverty level. Income can affect health when people cannot afford healthy living and working conditions, nutritious food and necessary medical care⁸. Poor communities are often located in areas with high levels of pollution⁹. Poverty can cause stress that weakens the immune system and causes people to become ill from pollution¹⁰. Living in poverty is also an indication that residents may lack health insurance or access to medical care. Medical care is vital for this census tract as it ranks in the 55th percentile for incidence of asthma. The community also has a high rate of linguistic isolation, meaning 84% of the census tract speaks little to no English and faces further inequities as a result.

O3.4

Santa Barbara County APCD's threshold of significance¹¹ is that a Project will not have a significant GHG impact if the operation of the project will:

- emit less than the screening significance level of 10,000 metric tons per year (MT/yr) CO₂e; or
- show compliance with an approved GHG emission reduction plan or GHG mitigation program, which avoids or substantially reduces GHG emissions (sources subject to the AB 32 Cap-and-Trade requirements pursuant to Title 17, Article 5 (California Cap on Greenhouse Gas Emissions and Market-based Compliance Mechanisms) would meet the criteria); or
- show consistency with the AB 32 Scoping Plan GHG emission reduction goals by reducing Project emissions 15.3 percent below Business As Usual (BAU).

O3.5

In September 2016, SBC APCD issued updated guidance¹² stating that, "On November 30, 2015, the California Supreme Court issued its opinion in Center for Biological Diversity v. California Department of Fish and Wildlife, Real Party In Interest Newhall Land and Farming. While the Supreme Court upheld the BAU approach as a valid CEQA threshold, the Court found that the

⁸ OEHHA Poverty <https://oehha.ca.gov/calenviroscreen/indicator/poverty>

⁹ Ibid.

¹⁰ Ibid.

¹¹ <https://www.ourair.org/wp-content/uploads/APCDCEQAGuidelinesApr2015.pdf>

¹² <https://www.ourair.org/wp-content/uploads/090616-GHG-memo.pdf>

application of this threshold in that case was not adequately supported by substantial evidence in the record.” For the proposed Project, the same standard applies. The proposed Project is not a use permitted by right in the PD/CM-AG district, and therefore, it is not accounted for in the “Business As Usual” approach; it is not accounted for in the AQMP, 2022 Scoping Plan, RTP/SCS, the City’s General Plan, or any other applicable planning document. The only allowable threshold of significance is the screening level of 10,000 MT/yr of CO₂e, and the proposed Project exceeds this threshold. The EIR must be revised and recirculated to include this information for analysis and include a finding of significance due to this significant and unavoidable cumulative considerable impact.

O3.5

The IS/EIR acknowledges that the California Energy Code (Title 24, Part 6, of the California Code of Regulations and the California Green Building Standards Code (Title 24, Part 11 of the California Code of Regulations) are applicable plans for renewable energy or energy efficiency. The State of California lists three approved compliance modeling software¹³ for non-residential buildings: CBECC-Com, EnergyPro, and IES VE. CalEEMod is not listed as an approved software. The CalEEMod and spreadsheet-based modeling in Appendix F do not comply with the 2022 Building Energy Efficiency Standards and under-reports the Project’s significant Energy impacts and fuel consumption to the public and decision makers. If the Project applies for a building permit on or after January 1, 2026, it must comply with the 2025 Building Energy Efficiency Standards, and only CBECC is currently listed as an approved software for the updated standards¹⁴. Since the IS/EIR did not accurately or adequately model the energy impacts in compliance with Title 24, it cannot conclude the Project will generate less than significant impacts, and a finding of significance must be made in a revised EIR.

O3.6

1.4.11: Land Use and Planning

The IS/EIR does not provide a consistency analysis with all land use plans, policies, or regulations adopted for the purpose of avoiding or mitigating an environmental effect. The Project has significant potential to conflict with many of these items, including but not limited to the following from the General Plan, and a revised EIR must be prepared with a complete consistency analysis in order to provide an adequate and accurate environmental document:

O3.7

¹³ California Energy Commission 2022 Energy Code Compliance Software
<https://www.energy.ca.gov/programs-and-topics/programs/building-energy-efficiency-standards/2022-building-energy-efficiency-1>

¹⁴ California Energy Commission 2025 Energy Code Compliance Software
<https://www.energy.ca.gov/programs-and-topics/programs/building-energy-efficiency-standards/2025-energy-code-compliance-software>

1. Goal L.U.5 Development Continuity. Discourage sprawl and "leap-frog" development.
2. Goal L.U.5 Implementation Program 1. Encourage industrial development in areas with appropriate urban services and characteristics; such services and characteristics are truck route access, railroad facilities access, relatively level terrain, available utilities, and adjacent high-intensity commercial area. Plan for residential land uses, which do not encroach on industrial districts.
3. Goal L.U.6a Balance Growth. Accommodate new development, balancing social, environmental, and economic considerations.
4. Goal L.U.6b Preserve Agricultural Resources. Accommodate growth while making every effort to preserve agricultural resources in the surrounding region.
5. Goal L.U.6c Urban/Agriculture Equilibrium. Achieve a balance between increased development and the maintenance, management, and/or preservation of local resources.
6. Objective L.U.6d. Encourage agricultural activities within the planning area to remain in operation by discouraging land uses that conflict with adjacent farming activities.
7. Goal L.U.6 Implementation Program 6. Wherever possible, new urban land uses should not be permitted on prime agricultural land. The exception to this policy would be in cases where the new development constitutes infilling between existing development nodes where agricultural activity is no longer desirable because of the surrounding of urban uses.
8. Goal L.U.11 Balance Land Use Supplies. The City will address the present imbalance between the land area designated for residential development and for those areas designated for industrial and commercial development.
9. Policy L.U.11 Jobs and Housing. Assure that a balance of land use between the employment-generating commercial and industrial uses, and residential development is achieved.
10. Objective L.U.11a. Maintain the current program of using existing land use and zoning maps to determine whether residential development is appropriate for those areas designated as industrial.
11. Objective L.U.11b. On an ongoing basis, determine if the redesignation of some industrial areas to nonindustrial uses is necessary, consistent with goals and policies of L.U.7 and good planning practice.

O3.7

This is especially notable as the Initial Study states that, “The Project is not a use permitted by right in the Commercial/Manufacturing/Agricultural Overlay Zoning District (PD/CM-AG) of the West Stowell Specific Plan.” Therefore, it is not accounted for in the AQMP, RTP/SCS, or the City’s General Plan. The EIR must be revised to state this information and include a finding of significance; it must also be recirculated for public review and comment.

The EIR states that, “It is the intent of the West Stowell Specific Plan to use this designation along with an agricultural overlay as a means of safeguarding and encouraging agriculturally-related industrial activity adjacent to existing agricultural uses,” and that, “...under the West Stowell Specific Plan similar uses are permitted subject to obtaining a conditional use permit according to the procedures set forth in Chapter 35 of the Santa Maria Zoning Ordinance. A use may be found to be similar if the Planning Commission finds that the project: (i) falls within the intent and purpose of the Commercial/Manufacturing/Agricultural Overlay Zoning District (PD/CM-AG); (ii) will not be obnoxious or detrimental to the public welfare; and (iii) is compatible with adjoining land uses.” It is clear that the Planning Commission will not be able to meet the required findings since the Project is not within the intent and purpose of the PD/CM-AG district. The West Stowell Specific Plan states that the designation “...permits activities which manufacture and retail on the same site, as well as other heavy commercial uses which may be land extensive or require transport of materials by heavy truck.” The Project does not propose to manufacture and retail products on the site. The Project is an industrial warehouse, not a commercial use. Further, Goal 2 of the West Stowell Specific Plan states that, “It shall be the goal of the West Stowell Specific Plan to preserve as much agricultural acreage as possible through the implementation of an Agricultural-Industrial Overlay Zone.” The Project is not related to agriculture in any way, and therefore is not within the intent and purpose of the PD/CM-AG or the West Stowell Specific Plan.

O3.7

Additionally, the Project will be obnoxious or detrimental to the public welfare and is not compatible with adjoining land uses. The EIR concludes that the project would generate approximately 55.08 VMT per employee per day, which exceeds the City of Santa Maria’s adopted threshold of 18.82 VMT per employee (two-way trip) by approximately 237 percent. This indicates that the Project operations are not compatible with any form of existing development in the City. The Project will also exceed the SBC APCD threshold for GHG emissions and contribute to climate change. The Project will be detrimental and contribute to increased VMT and GHG emissions in the City. The EIR must be revised to include a finding of significance as there is no substantial evidence to support that the Planning Commission will

approve the request, and there is no substantial evidence that the project meets the required findings for approval.

Further, it must be noted that the horizon year of the City's General Plan is 2030. The Project is proposed within five years of the horizon year, and the IS/EIR has not included any analysis of the City's progress toward the General Plan buildout scenario. Given the EIR's statement that the proposed Project is not a permitted use in the West Stowell Specific Plan, the Project is not accounted for or analyzed by the City's current General Plan and its EIR. The Project is not within its growth projections or environmental analysis. The IS/EIR is inadequate as an informational document since it has not provided a cumulative analysis of all industrial projects approved since General Plan adoption. A revised EIR must be prepared to include this information for analysis to adequately and accurately analyze all potentially significant environmental impacts. A finding of significance must be included because the Project is not a permitted use and therefore is not accounted for in the General Plan growth projections and the General Plan EIR.

O3.7

1.4.13: Population and Housing

The IS/EIR utilizes uncertain language and does not provide any meaningful analysis or supporting evidence to substantiate the conclusion that there will be no significant impacts on population and housing. For example, the IS/EIR states that, " While the construction phase would generate temporary employment opportunities, these jobs would *likely* be filled by the existing *regional* workforce and would not require an influx of new residents." Stating that these workers would already reside in the "region" is misleading to the public and decision makers. The EIR concludes regarding operational employment that, "...given the Project's location within an urbanized portion of the city with an existing employment base, these jobs are *expected* to be filled by local workers." Relying on the entire labor force within an undefined distance, potentially the greater Central California region, to fill the Project's construction and operational jobs will increase VMT and emissions during all phases of construction and operations and an EIR must be prepared to account for longer worker trip distances. The IS/EIR relies upon the total 41,620 people in the workforce in the City, but does not provide any information regarding the City's available undeployed workforce, such as evidence that this specific workforce is qualified for or interested in industrial work to substantiate this claim.

O3.8

Additionally, regarding operational employees, the IS/EIR states the project will generate 558 new jobs without providing the methodology that resulted in this calculation. The EIR must be revised to include this information to provide an adequate and accurate environmental analysis.

The IS/EIR does not provide any substantial evidence to support the claim that the Project is within the City’s growth projections or those of the RTP/SCS. Given that the proposed Project is not a permitted use in its land use designation, it was not accounted for in the growth projections of the General Plan nor the RTP/SCS, and a finding of significance must be included in a revised EIR.

O3.8

4.1 Transportation

The IS/EIR has not adequately analyzed the Project’s potential to substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses, or the Project’s potential to result in inadequate emergency access. There are no exhibits adequately depicting the available maneuvering and queueing space for trucks/trailers at the intersection of the Project driveways and the adjacent streets. There are also no exhibits adequately depicting the on-site turning radius available for trucks maneuvering throughout the site. The EIR states that, “The Santa Maria Public Works Department has reviewed the proposed Project and confirmed that it would not create hazardous roadway conditions. Therefore, the Project would result in less than significant impacts related to hazardous design features.”

However, the City Public Works Department review and findings of the proposed Project are excluded from public review, which does not comply with CEQA’s requirements for adequate informational documents and meaningful disclosure (CEQA § 15121 and PRC 21003(b)). Incorporation by reference (CEQA § 15150 (f)) is not appropriate, as this contributes directly to the analysis of the problem at hand. A revised EIR must be prepared and recirculated to include the City Public Works Department review and findings of the proposed Project for review, analysis, and comment by the public and decision makers in order to comply with CEQA’s requirements for adequate informational documents and meaningful disclosure (CEQA § 15121 and PRC 21003(b)). The IS/EIR has not provided any details regarding the requirements for SMMC Section 12-33 or meaningful analysis of the Project’s compliance or noncompliance with these requirements. The IS/EIR has not included any substantial evidence to support a less-than-significant finding. A revised EIR must be prepared to include a finding of significance due to these significant and unavoidable impacts and recirculated.

O3.9

The IS/EIR states regarding emergency access that, “The proposed project has been reviewed by the Santa Maria Fire Department (SMFD) and would follow the Santa Maria Fire Department’s requirements to make all three access roads a minimum width to allow fire apparatus access to the proposed facility. Access and circulation would be designed to comply with all safety and street improvement standards per the SMFD and the City’s Municipal Code Title 7 Traffic

Regulations.” However, the City Fire Department review and findings of the proposed project are excluded from public review, which does not comply with CEQA’s requirements for adequate informational documents and meaningful disclosure (CEQA § 15121 and PRC 21003(b)). Incorporation by reference (CEQA § 15150 (f)) is not appropriate, as this contributes directly to the analysis of the problem at hand. A revised EIR must be prepared and recirculated to include the City Fire Department review and findings of the proposed project for review, analysis, and comment by the public and decision makers in order to comply with CEQA’s requirements for adequate informational documents and meaningful disclosure (CEQA § 15121 and PRC 21003(b)).

O3.9

The EIR has not provided any details regarding the requirements for emergency access or meaningful analysis of the project’s compliance or noncompliance with these requirements. Deferring this environmental analysis required by CEQA to the construction permitting phase is improper mitigation and does not comply with CEQA’s requirement for meaningful disclosure and adequate informational documents. A revised EIR must be prepared to include a finding of significance, as the EIR has not provided any meaningful evidence to support a less-than-significant finding.

6.0 Alternatives

The EIR is required to evaluate a reasonable range of alternatives to the proposed Project, which will avoid or substantially lessen any of the significant effects of the Project (CEQA § 15126.6). The alternatives chosen for analysis include the CEQA required “No Project/No Development” alternative and only one other - Reduced Size Alternative. The EIR must be revised to include analysis of a reasonable range of alternatives and foster informed decision making (CEQA § 15126.6). This should include alternatives such as development of the site with a Pproject that reduces all of the proposed Project’s significant and unavoidable impacts to a less than significant level, and a mixed-use Project that provides affordable housing and exclusively local-serving commercial uses that may reduce VMT, GHG emissions, and simultaneously improve Air Quality.

O3.10

Conclusion

For the foregoing reasons, GSEJA believes the EIR is flawed, and a revised EIR must be prepared for the proposed Project and recirculated for public review. Golden State Environmental Justice Alliance requests to be added to the public interest list regarding any subsequent environmental documents, public notices, public hearings, and notices of

O3.11

Cody Graybehl
December 23, 2025
Page 11

determination for this Project. Send all communications to Golden State Environmental Justice Alliance, P.O. Box 79222, Corona, CA 92877.

Sincerely,



Vashon Simien
Blum, Collins & Ho, LLP

Attachments:

1. SWAPE Technical Analysis

03.11



Technical Consultation, Data Analysis and
Litigation Support for the Environment

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December 19, 2025

Gary Ho
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**Subject: Comments on the Package Delivery Warehouse Planned Development Permit Project
(SCH No. 2025080640)**

03.12

Dear Mr. Ho,

We have reviewed the November 2025 Draft Environmental Impact Report (“DEIR”) and the August 2025 Initial Study/Environmental Checklist (“IS”) for the Package Delivery Warehouse Planned Development Permit (“Project”) located in the City of Santa Maria (“City”). The Project proposes to construct a 169,104-square-foot (“SF) warehouse and 990 parking spaces on the 32-acre site.

Our review concludes that the DEIR and IS fail to adequately evaluate the Project’s air quality, health risk, and greenhouse gas impacts. As a result, emissions and health risk impacts associated with construction and operation of the proposed Project may be underestimated and inadequately addressed. A revised Environmental Impact Report (“EIR”) should be prepared to adequately assess and mitigate the potential air quality, health risk, and greenhouse gas impacts that the Project may have on the environment.

03.13

Air Quality

Unsubstantiated Input Parameters Used to Estimate Project Emissions

When reviewing the Project’s CalEEMod output files, provided in the Air Quality and Greenhouse Gas Emissions Technical Report (“AQ Analysis”) as Attachment 2 to the IS in Appendix A, we identified a model input related to Project construction that is inconsistent with information disclosed in the Project documents. A revised EIR should be prepared to include an updated air quality analysis that provides a more detailed evaluation of the impact that construction of the Project may have on local and regional air quality.

03.14

Unsubstantiated Changes to Individual Construction Phase Lengths

Review of the CalEEMod output files demonstrates that the “West Stowell Delivery Station-Construction Detailed Report” model includes changes to the default individual construction phase lengths (see screenshot below) (Appendix A, Attachment 2, pp. 223).

Screen	Justification
Construction: Construction Phases	Demolition phase was not required as Project site is undeveloped and currently used for agricultural purposes. Grading-Building Foundation phase would require 14,272 cubic yard (CY) of soil import and Grading-Rest of Site phase would require 132,622 CY, for a project total of 146,894 CY of soil import.
Construction: Off-Road Equipment	Project-specific equipment fleet, all equipment greater than 50 HP would meet Tier 4 Final engine standards.
Construction: Dust From Material Movement	Grading-Building Foundation phase would require 14,272 cubic yard (CY) of soil import and Grading-Rest of Site phase would require 132,622 CY, for a project total of 146,894 CY of soil import.

As a result of these changes, the model includes the following construction schedule (see excerpt below) (Appendix A, pp. 210):

Phase Name	Phase Type	Start Date	End Date	Days Per Week	Work Days per Phase	Phase Description
Site Preparation	Site Preparation	4/20/2026	4/28/2026	5.00	7.00	—
Grading-Building Foundation	Grading	4/29/2026	6/9/2026	5.00	30.0	—
Grading-Rest of Site	Grading	6/10/2026	12/31/2026	5.00	147	—
Building Construction	Building Construction	6/10/2026	5/21/2027	5.00	248	—
Paving	Paving	5/22/2027	6/14/2027	5.00	16.0	—
Architectural Coating	Architectural Coating	5/22/2027	7/9/2027	5.00	35.0	—

The CalEEMod User’s Guide requires any changes to model defaults be justified.¹ The justification provided for these changes is:

“Demolition phase was not required as Project site is undeveloped and currently used for agricultural purposes. Grading-Building Foundation phase would require 14,272 cubic yard (CY) of soil import and Grading-Rest of Site phase would require 132,622 CY, for a project total of 146,894 CY of soil import” (Appendix A, pp. 223).

Regarding the Project’s construction schedule, the DEIR states that “[c]onstruction of the proposed project is anticipated to occur over one year, from approximately March 2026 through July 2027” (p. ES-3). However, the construction schedule in the model remains unsupported.

While the DEIR justifies the total construction duration of 16 months, the DEIR fails to discuss the lengths of the *individual* construction phase lengths (e.g., demolition, grading, building construction, and architectural coating) whatsoever. According to the CalEEMod User’s Guide:

¹ “CalEEMod User Guide.” CAPCOA, April 2022, available at: https://www.caleemod.com/documents/user-guide/01_User%20Guide.pdf, p. 13, 14.

“CalEEMod was also designed to allow the user to change the defaults to reflect site- or project-specific information, when available, provided that the information is supported by substantial evidence as required by CEQA.”²

As the DEIR fails to provide substantial evidence to support the revised individual construction phase lengths, we cannot verify the changes. According to the CalEEMod User’s Guide, each construction phase is associated with different emissions activities (see excerpt below).³

Table 3. CalEEMod Default Construction Phases^a

Phase Type	Description
NON-LINEAR LAND USE TYPES (VERTICAL CONSTRUCTION)	
Demolition	Involves removing buildings or structures.
Site Preparation	Involves clearing vegetation (grubbing and tree/stump removal) and removing stones and other unwanted material or debris prior to grading.
Grading	Involves the cut and fill of land to ensure that the proper base and slope is created for the foundation.
Building Construction	Involves the construction of the foundation, structures, and buildings.
Paving	Involves the laying of concrete or asphalt such as in parking lots, roads, driveways, or sidewalks.
Architectural Coating	Involves the application of coatings to both the interior and exterior of buildings or structures, the painting of parking lot or parking garage striping, associated signage and curbs, and the painting of the walls or other components such as stair railings inside parking structures.

O3.14

By modifying the individual construction phase lengths, the model assumes there are more days to complete the construction activities required by the certain phases. The model therefore assumes fewer activities would be required per day for those phases and, consequently, less pollutants emitted per day. Until the construction phases are verified, the model may underestimate the peak daily emissions associated with certain construction activities. The model should have instead proportionately altered all phase lengths to match the proposed construction duration of 16 months.

Diesel Particulate Matter Emissions Inadequately Evaluated

The IS claims a less-than-significant health risk impact without conducting a quantified construction and operational health risk assessment (“HRA”). The DEIR and IS are thus inconsistent with CEQA’s requirement to correlate the increase in emissions generated by the Project to the adverse impacts on human health caused by those emissions. Under CEQA, agencies must make a “reasonable effort to substantively connect a project’s air quality impacts to likely health consequences.”⁴ The DEIR and IS also fail to align with the California Department of Justice (“CA DOJ”) guidelines for warehouse best practices, which recommends that all potential warehouse projects prepare a quantitative HRA in accordance with the Office of Environmental Health Hazard Assessment (“OEHHA”), the organization

O3.15

² “CalEEMod User Guide.” CAPCOA, April 2022, available at: https://www.caleemod.com/documents/user-guide/01_User%20Guide.pdf, p. 10.

³ “CalEEMod User Guide.” CAPCOA, April 2022, available at: https://www.caleemod.com/documents/user-guide/01_User%20Guide.pdf, p. 34, Table 3.

⁴ “Sierra Club v. County of Fresno.” Supreme Court of California, December 2018, available at: <https://law.justia.com/cases/california/supreme-court/2018/s219783a.html>

responsible for providing guidance on conducting HRAs in California.⁵ To comply with these requirements, an HRA should have been prepared to assess the potential health risks to nearby sensitive receptors from diesel particulate matter (“DPM”) emissions generated during construction and operation. The sum of the Project’s construction and operational cancer risk estimates should then be compared to the Santa Barbara County Air Pollution Control District (“SBCAPCD”) threshold of 10 in one million.⁶

Greenhouse Gas

Failure to Adequately Evaluate Greenhouse Gas Impacts

The IS estimates that the Project would generate net annual greenhouse gas (“GHG”) emissions of 10,028 metric tons of carbon dioxide equivalents per year (“MT CO₂e/year”) (see excerpt below) (p. 47, Table 14).

Table 13 Unmitigated Project Annual GHG Operational Emissions

Source Category	GHG Emissions (MTCO ₂ e)
Area	3
Mobile-Employee Vehicles (Onsite)	76
Mobile-Employee Vehicles (Offsite)	783
Mobile-Delivery Vans (Onsite)	66
Mobile-Delivery Vans (Offsite)	3,768
Mobile-Private Carrier Vehicles (Onsite)	18
Mobile-Private Carrier Vehicles (Offsite)	531
Mobile-Line-Haul Trucks (Onsite)	36
Mobile-Line-Haul Trucks (Offsite) ^b	4,344
Electricity Consumption-Buildings	15
Water	25
Waste	58
Refrigerants	224
Stationary (Fire Pump)	6
Construction (amortized)	85
Project Total	10,038

Source: NV5 2025 (Attachment 2)

^b Offsite line-haul truck emissions include the total GHG emissions from haul truck travel within and outside Santa Barbara County

However, the IS fails to compare to a numeric threshold, stating:

“In the absence of quantitative GHG thresholds and/or a qualified GHG reduction plan for use by a project to tier or streamline its environmental analysis, CEQA provides that a lead agency can rely on regulatory compliance to show a less –than significant GHG impact if the project complies with or exceeds those programs adopted by CARB or other state agencies” (p. 46).

⁵ “Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act.” CA DOJ, available at: <https://oag.ca.gov/sites/all/files/agweb/pdfs/environment/warehouse-best-practices.pdf>, p. 6.

⁶ “Significant Risk Facilities.” SBCAPCD, available at: <https://www.ourair.org/significant-risk-facilities/>.

While we acknowledge that the SBCAPCD has not adopted a numeric GHG threshold, other air districts like South Coast Air Quality Management District (“SCAQMD”) have established a threshold of 10,000 MT CO₂e/year for industrial projects.⁷ Although the Project is not formally subject to SCAQMD’s guidelines, this threshold has been widely applied in CEQA practice as a reasonable, evidence-based benchmark for evaluating GHG emissions from large-scale industrial development.

In the absence of a locally adopted quantitative threshold, use of the SCAQMD industrial threshold provides a well-established and transparent framework for determining the significance of the Project’s GHG emissions. To quantitatively evaluate the Project’s GHG emissions, we compared the Project’s GHG emissions, as estimated by the IS, to the SCAQMD numeric threshold of 10,000 MT CO₂e/year.

As previously stated, the IS/MND estimates that the Project would generate net annual GHG emissions of 10,028 MT CO₂e/year (p. 47, Table 14). When applying this threshold, the Project’s air model indicates a potentially significant GHG impact (see table below).

O3.16

IS/MND Annual Greenhouse Gas Emissions	
Proposed Project	GHG Emissions
Total Net Annual GHG Emissions (MT CO ₂ e/year)	10,028
SCAQMD Threshold for Industrial Facilities (MT CO ₂ e/year)	10,000
<i>Exceeds?</i>	Yes

As demonstrated above, the Project’s estimated annual GHG emissions exceed the SCAQMD threshold for industrial facilities of 10,000 MT CO₂e/year, thus indicative of a potentially significant impact not previously addressed or mitigated in the IS. Due to the scale of the Project’s emissions, we recommend the IS’s less-than-significant GHG impact conclusion not be relied upon. A revised EIR should be prepared, including an updated GHG analysis and incorporating mitigation measures to reduce the Project’s GHG emissions to the maximum extent feasible.

Mitigation

Feasible Mitigation Measures Available to Reduce Emissions

The DEIR and IS are required under CEQA to implement all feasible mitigation to reduce the Project’s potential impacts. As demonstrated above, the Project would result in potentially significant GHG impacts that we argue should be mitigated further.

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⁷ “South Coast AQMD Air Quality Significance Thresholds.” SCAQMD, March 2023, available at: <https://www.aqmd.gov/docs/default-source/ceqa/handbook/south-coast-aqmd-air-quality-significance-thresholds.pdf?sfvrsn=25>.

To reduce the GHG emissions associated with the Project, we recommend several mitigation measures (see list below). The CA DOJ recommends:⁸

- Installing solar photovoltaic systems on the project site of a specified electrical generation capacity that is equal to or greater than the building’s projected energy needs, including all electrical chargers.
- Designing all project building roofs to accommodate the maximum future coverage of solar panels and installing the maximum solar power generation capacity feasible.
- Oversizing electrical rooms by 25 percent or providing a secondary electrical room to accommodate future expansion of electric vehicle charging capability.
- Requiring all stand-by emergency generators to be powered by a non-diesel fuel.
- Meeting CalGreen Tier 2 green building standards, including all provisions related to designated parking for clean air vehicles, electric vehicle charging, and bicycle parking.
- Designing to LEED green building certification standards.
- Constructing zero-emission truck charging/fueling stations proportional to the number of dock doors at the project.
- Running conduit to designated locations for future electric truck charging stations.
- Constructing and maintaining electric light-duty vehicle charging stations proportional to the number of employee parking spaces.
- Running conduit to an additional proportion of employee parking spaces for a future increase in the number of electric light-duty charging stations.
- Requiring facility operators to train managers and employees on efficient scheduling and load management to eliminate unnecessary queuing and idling of trucks.
- Requiring that every tenant train its staff in charge of keeping vehicle records in diesel technologies and compliance with CARB regulations, by attending CARB-approved courses. Also require facility operators to maintain records on-site demonstrating compliance and make records available for inspection by the local jurisdiction, air district, and state upon request.
- Requiring tenants to enroll in the United States Environmental Protection Agency’s SmartWay program, and requiring tenants who own, operate, or hire trucking carriers with more than 100 trucks to use carriers that are SmartWay carriers.
- Providing tenants with information on incentive programs, such as the Carl Moyer Program and Voucher Incentive Program, to upgrade their fleets.

SCAQMD staff recommends:⁹

- Maximizing the use of solar energy by installing solar energy arrays.

⁸ “Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act.” State of California Department of Justice, September 2022, *available at*: <https://oag.ca.gov/system/files/media/warehouse-best-practices.pdf>, p. 8 – 10.

⁹ “Draft Environmental Impact Report (EIR) for the Proposed CADO Menifee Industrial Warehouse Project (Proposed Project).” SCAQMD, April 2024, *available at*: <https://www.aqmd.gov/docs/default-source/ceqa/comment-letters/2024/april-2024/RVC240313-05.pdf?sfvrsn=8>, p. 3.

- Using light-colored paving and roofing materials.
- Utilizing only Energy Star heating, cooling, and lighting devices and appliances.

CEQA Guidelines 15126.4 (c)(3) include “[o]ffsite measures, including offsets that are not otherwise required, to mitigate a project’s emissions” as an option for GHG mitigation.¹⁰ An example of this was in the case of the Oakland Sports and Mixed-Use Project, where off-site reduction measures in the neighboring communities were recommended.¹¹ We recommend consideration of local carbon offset programs to reduce the Project’s GHG impacts as a measure of last result.

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As demonstrated above, we have provided several mitigation measures that would reduce Project-related GHG emissions. These measures offer a cost-effective, feasible way to incorporate lower-emitting design features into the proposed Project, which subsequently reduce emissions released during Project construction and operation.

A revised EIR should be prepared that includes all feasible mitigation measures, as well as an updated GHG analysis to ensure that the necessary mitigation measures are implemented to reduce emissions to the maximum extent feasible. The revised EIR should also demonstrate a commitment to the implementation of these measures prior to Project approval, to ensure that the Project’s potentially significant emissions are reduced to the maximum extent possible.

Disclaimer

SWAPE has received limited documentation regarding this project. Additional information may become available in the future; thus, we retain the right to revise or amend this report when additional information becomes available. Our professional services have been performed using that degree of care and skill ordinarily exercised, under similar circumstances, by reputable environmental consultants practicing in this or similar localities at the time of service. No other warranty, expressed or implied, is made as to the scope of work, work methodologies and protocols, site conditions, analytical testing results, and findings presented. This report reflects efforts which were limited to information that was reasonably accessible at the time of the work, and may contain informational gaps, inconsistencies, or otherwise be incomplete due to the unavailability or uncertainty of information obtained or provided by third parties.

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Sincerely,

¹⁰ “Cal. Code Regs. tit. 14 § 15126.4.” CEQA Guidelines, May 2024, *available at*: <https://casetext.com/regulation/california-code-of-regulations/title-14-natural-resources/division-6-resources-agency/chapter-3-guidelines-for-implementation-of-the-california-environmental-quality-act/article-9-contents-of-environmental-impact-reports/section-151264-consideration-and-discussion-of-mitigation-measures-proposed-to-minimize-significant-effects>.

¹¹ “Cal. Pub. Resources Code § 21168.6.7.” 2023, *available at*: <https://casetext.com/statute/california-codes/california-public-resources-code/division-13-environmental-quality/chapter-6-limitations/section-2116867-oakland-sports-and-mixed-use-project-conditions-for-approval-certification-of-project-for-streamlining>.



Matt Hagemann, P.G., C.Hg.



Paul E. Rosenfeld, Ph.D.

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Attachment A: Matt Hagemann CV
Attachment B: Paul Rosenfeld CV



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Matthew F. Hagemann, P.G., C.Hg.

- **Geologic and Hydrogeologic Characterization, Investigation and Remediation Strategies**
- **Industrial Stormwater Compliance**
- **CEQA Review**
- **Expert Testimony**

Professional Certifications:

California Professional Geologist, P.G.
California Certified Hydrogeologist, C.Hg.

Education:

M.S. Degree, Geology, California State University Los Angeles, Los Angeles, CA, 1984.
B.A. Degree, Geology, Humboldt State University, Arcata, CA, 1982.

Professional Experience:

30 years of experience in environmental policy, contaminant assessment and remediation, stormwater compliance, and CEQA review. Spent nine years with the U.S. EPA in the Resource Conservation Recovery Act (RCRA) and Superfund programs and served as EPA's Senior Science Policy Advisor in the Western Regional Office where I identified emerging threats to groundwater. While with EPA, I served as a Senior Hydrogeologist in the oversight of the assessment of seven major military facilities undergoing base closure. Led numerous enforcement actions under provisions of the Resource Conservation and Recovery Act (RCRA) and directed efforts to improve hydrogeologic characterization and water quality monitoring. For the past 15 years, as a founding partner with SWAPE, I developed extensive client relationships and has managed complex projects that include consultations as an expert witness and a regulatory specialist, and managing projects ranging from industrial stormwater compliance to CEQA review of impacts from hazardous waste, air quality and greenhouse gas emissions.

Positions held include:

Government:

Senior Science Policy Advisor and Hydrogeologist, U.S. Environmental Protection Agency (1989–1998);

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Hydrogeologist, National Park Service, Water Resources Division (1998 – 2000);
Geologist, U.S. Forest Service (1986 – 1998).

Educational:

Geology Instructor, Golden West College, 2010 – 2014, 2017;
Adjunct Faculty Member, San Francisco State University, Department of Geosciences (1993 – 1998);
Instructor, College of Marin, Department of Science (1990 – 1995).

Private Sector:

Founding Partner, Soil/Water/Air Protection Enterprise (SWAPE) (2003 – present);
Senior Environmental Analyst, Komex H2O Science, Inc. (2000 -- 2003);
Executive Director, Orange Coast Watch (2001 – 2004);
Geologist, Dames & Moore (1984 – 1986).

Senior Regulatory and Litigation Support Analyst:

With SWAPE, responsibilities have included:

- Lead analyst and testifying expert, for both plaintiffs and defendants, in the review of over 300 environmental impact reports and negative declarations since 2003 under CEQA that identify significant issues with regard to hazardous waste, water resources, water quality, air quality, greenhouse gas emissions, and geologic hazards.
- Recommending additional mitigation measures to lead agencies at the local and county level to include additional characterization of health risks and implementation of protective measures to reduce exposure to hazards from toxins.
- Stormwater analysis, sampling and best management practice evaluation, for both government agencies and corporate clients, at more than 150 industrial facilities.
- Serving as expert witness for both plaintiffs and defendants in cases including contamination of groundwater, CERCLA compliance in assessment and remediation, and industrial stormwater contamination.
- Technical assistance and litigation support for vapor intrusion concerns, for both government agencies and corporate clients.
- Lead analyst and testifying expert in the review of environmental issues in license applications for large solar power plants before the California Energy Commission.
- Manager of a project to evaluate numerous formerly used military sites in the western U.S.
- Manager of a comprehensive evaluation of potential sources of perchlorate contamination in Southern California drinking water wells.
- Manager and designated expert for litigation support under provisions of Proposition 65 in the review of releases of gasoline to sources drinking water at major refineries and hundreds of gas stations throughout California.

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With Komex H2O Science Inc., duties included the following:

- Senior author of a report on the extent of perchlorate contamination that was used in testimony by the former U.S. EPA Administrator and General Counsel.
- Senior researcher in the development of a comprehensive, electronically interactive chronology of MTBE use, research, and regulation.
- Senior researcher in the development of a comprehensive, electronically interactive chronology of perchlorate use, research, and regulation.
- Senior researcher in a study that estimates nationwide costs for MTBE remediation and drinking

water treatment, results of which were published in newspapers nationwide and in testimony against provisions of an energy bill that would limit liability for oil companies.

- Research to support litigation to restore drinking water supplies that have been contaminated by MTBE in California and New York.
- Lead author for a multi-volume remedial investigation report for an operating school in Los Angeles that met strict State of California regulatory requirements.
- Development of strategic approaches for cleanup of contaminated sites in consultation with clients and regulators.

Hydrogeology:

As a Senior Hydrogeologist with the U.S. Environmental Protection Agency, led investigations to characterize and cleanup closing military bases, including Mare Island Naval Shipyard, Hunters Point Naval Shipyard, Treasure Island Naval Station, Alameda Naval Station, Moffett Field, Mather Army Airfield, and Sacramento Army Depot. Specific activities included:

- Leading efforts to model groundwater flow and contaminant transport, ensured adequacy of monitoring networks, and assessed cleanup alternatives for contaminated sediment, soil, and groundwater.
- Initiating a regional program for evaluation of groundwater sampling practices and laboratory analysis at military bases.
- Identifying emerging issues, wrote technical guidance, and assisted in policy and regulation development through work on four national U.S. EPA workgroups, including the Superfund Groundwater Technical Forum and the Federal Facilities Forum.

At the request of the State of Hawaii, developed a methodology to determine the vulnerability of groundwater to contamination on the islands of Maui and Oahu. Used analytical models and a GIS to show zones of vulnerability, and the results were adopted and published by the State of Hawaii and County of Maui.

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As a hydrogeologist with the EPA Groundwater Protection Section, worked with provisions of the Safe Drinking Water Act and NEPA to prevent drinking water contamination. Specific activities included the following:

- Received an EPA Bronze Medal for contribution to the development of national guidance for the protection of drinking water.
- Managed the Sole Source Aquifer Program and protected the drinking water of two communities through designation under the Safe Drinking Water Act. Prepared geologic reports, conducted hearings, and responded to public comments from residents who were very concerned about the impact of designation.
- Reviewed a number of Environmental Impact Statements for planned major developments, including large hazardous and solid waste disposal facilities, mine reclamation, and water transfer.

Served as a hydrogeologist with the RCRA Hazardous Waste program. Duties included:

- Supervised the hydrogeologic investigation of hazardous waste sites to determine compliance with Subtitle C requirements.
- Reviewed and wrote "part B" permits for the disposal of hazardous waste.
- Conducted RCRA Corrective Action investigations of waste sites and led inspections that formed the basis for significant enforcement actions that were developed in close coordination with U.S. EPA legal counsel.

- Wrote contract specifications and supervised contractor's investigations of waste sites.

With the National Park Service, directed service-wide investigations of contaminant sources to prevent degradation of water quality, including the following:

- Applied pertinent laws and regulations including CERCLA, RCRA, NEPA, NRDA, and the Clean Water Act to control military, mining, and landfill contaminants.
- Conducted watershed-scale investigations of contaminants at parks, including Yellowstone and Olympic National Park.
- Identified high-levels of perchlorate in soil adjacent to a national park in New Mexico and advised park superintendent on appropriate response actions under CERCLA.
- Served as a Park Service representative on the Interagency Perchlorate Steering Committee, a national workgroup.
- Developed a program to conduct environmental compliance audits of all National Parks while serving on a national workgroup.
- Co-authored two papers on the potential for water contamination from the operation of personal watercraft and snowmobiles, these papers serving as the basis for the development of nation-wide policy on the use of these vehicles in National Parks.
- Contributed to the Federal Multi-Agency Source Water Agreement under the Clean Water Action Plan.

Policy:

Served as senior management as the Senior Science Policy Advisor with the U.S. Environmental Protection Agency, Region 9. Activities included the following:

- Advising the Regional Administrator and senior management on emerging issues such as the potential for the gasoline additive MTBE and ammonium perchlorate to contaminate drinking water supplies.
- Shaping EPA's national response to these threats by serving on workgroups and by contributing to guidance, including the Office of Research and Development publication, Oxygenates in Water: Critical Information and Research Needs.
- Improving the technical training of EPA's scientific and engineering staff.
- Earning an EPA Bronze Medal for representing the region's 300 scientists and engineers in negotiations with the Administrator and senior management to better integrate scientific principles into the policy-making process.
- Establishing national protocol for the peer review of scientific documents.

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Geology:

With the U.S. Forest Service, led investigations to determine hillslope stability of areas proposed for timber harvest in the central Oregon Coast Range. Specific activities included:

- Mapping geology in the field, and used aerial photographic interpretation and mathematical models to determine slope stability.
- Coordinating research with community stakeholders who were concerned with natural resource protection.
- Characterizing the geology of an aquifer that serves as the sole source of drinking water for the city of Medford, Oregon.

As a consultant with Dames and Moore, led geologic investigations of two contaminated sites (later listed on the Superfund NPL) in the Portland, Oregon, area and a large RCRA hazardous waste site in eastern Oregon.

Duties included the following:

- Supervising year-long effort for soil and groundwater sampling.
- Conducting aquifer tests.
- Investigating active faults beneath sites proposed for hazardous waste disposal.

Teaching:

From 1990 to 1998, taught at least one course per semester at the community college and university levels:

- At San Francisco State University, held an adjunct faculty position and taught courses in environmental geology, oceanography (lab and lecture), hydrogeology, and groundwater contamination.
- Served as a committee member for graduate and undergraduate students.
- Taught courses in environmental geology and oceanography at the College of Marin.
- Part time geology instructor at Golden West College in Huntington Beach, California from 2010 to 2014 and in 2017.

Summary of Testimony Experience Over Past Four Years

In Re New Jersey Department of Environmental Protection et al. vs. E.I. DuPont de Nemours and Company, in the United States District Court, District of New Jersey, Civil Action No. 1:19-cv-14766-RMB-JBC. Deposition in 2025.

Representing Plaintiffs in matters regarding contamination of groundwater, wastewater, soil, and air with per- and poly-fluoroalkyl substances.

In Re Edmond Asher, et al., vs. RTX Corporation (f/k/a Raytheon Technologies Corporation, et al.) in the County of Huntington Superior Court, Indiana, Cause number 35D01-2006-CT-000338. Deposition in 2024. Representing Plaintiffs in matters regarding contamination of groundwater and soil vapor with trichlorethylene.

In Re Wright vs Consolidated Rail Corporation In the Circuit Court of Cook County, Illinois, Case No: 21L3966. Deposition in 2023, Representing Plaintiff in matters involving groundwater and drinking water contamination of perchloroethylene, trichlorethylene, 1,2-dichloroethane, and carbon tetrachloride.

In Re Behr Dayton Thermal Products LLC In the United States District Court for the Southern District of Ohio Western Division at Dayton, Case No: 08-cv-326. Deposition in 2022. Representing Plaintiff in matters regarding contamination of groundwater and indoor air with perchloroethylene and trichloethelene.

Orange County Water District vs. Sabic Innovative Plastics US, LLC, et al. In the Court of Appeal, Fourth District,

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Division 1, California, Case No: D070553. Deposition in 2020. Representing Plaintiff in matters involving compliance with The Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA).

Los Angeles Waterkeeper vs. AAA Plating and Inspection, Inc. In the United States District Court for the Central District of California, Case No: No. CV 18-5916 PA (GJSx). Deposition in 2019. Expert witness representing Plaintiff in matters involving contaminated stormwater runoff at an industrial facility in Compton, California.

Californians for Alternatives to Toxics vs. Schneider Dock and Intermodal Facility. In the United States District Court for the Northern District of California, Case No: 3:17-cv-05287-JST. Deposition in 2019. Expert witness representing Plaintiff in matters involving contaminated stormwater runoff at an industrial facility in Eureka, California.

Bells et al. vs. The 3M Company et al. In the United States District Court for the District of Colorado, Case No: 1:16-CV-02531-RBJ. Deposition in 2018. Expert witness representing Plaintiff on matters regarding the general hydrogeological conditions present in an area impacted by per- and poly-fluoroalkyl substances.

Ungar vs. Foundation for Affordable Housing. In the Superior Court, State of California, Los Angeles County, Case No. BC628890 Deposition in 2017. Expert witness representing defendant on matters involving alleged drinking water contamination.

Invited Testimony, Reports, Papers and Presentations:

Hagemann, M.F., 2008. Disclosure of Hazardous Waste Issues under CEQA. Presentation to the Public Environmental Law Conference, Eugene, Oregon.

Hagemann, M.F., 2008. Disclosure of Hazardous Waste Issues under CEQA. Invited presentation to U.S.EPA Region 9, San Francisco, California.

Hagemann, M.F., 2005. Use of Electronic Databases in Environmental Regulation, Policy Making and Public Participation. Brownfields 2005, Denver, Colorado.

Hagemann, M.F., 2004. Perchlorate Contamination of the Colorado River and Impacts to Drinking Water in Nevada and the Southwestern U.S. Presentation to a meeting of the American Groundwater Trust, Las Vegas, NV (served on conference organizing committee).

Hagemann, M.F., 2004. Invited testimony to a California Senate committee hearing on air toxins at schools in Southern California, Los Angeles.

Brown, A., Farrow, J., Gray, A. and **Hagemann, M.**, 2004. An Estimate of Costs to Address MTBE Releases from Underground Storage Tanks and the Resulting Impact to Drinking Water Wells.

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Presentation to the Ground Water and Environmental Law Conference, National Groundwater Association.

Hagemann, M.F., 2004. Perchlorate Contamination of the Colorado River and Impacts to Drinking Water in Arizona and the Southwestern U.S. Presentation to a meeting of the American Groundwater Trust, Phoenix, AZ (served on conference organizing committee).

Hagemann, M.F., 2003. Perchlorate Contamination of the Colorado River and Impacts to Drinking Water in the Southwestern U.S. Invited presentation to a special committee meeting of the National Academy of Sciences, Irvine, CA.

Hagemann, M.F., 2003. Perchlorate Contamination of the Colorado River. Invited presentation to a tribal EPA meeting, Pechanga, CA.

Hagemann, M.F., 2003. Perchlorate Contamination of the Colorado River. Invited presentation to a meeting of tribal representatives, Parker, AZ.

Hagemann, M.F., 2003. Impact of Perchlorate on the Colorado River and Associated Drinking Water Supplies. Invited presentation to the Inter-Tribal Meeting, Torres Martinez Tribe.

Hagemann, M.F., 2003. The Emergence of Perchlorate as a Widespread Drinking Water Contaminant. Invited presentation to the U.S. EPA Region 9.

Hagemann, M.F., 2003. A Deductive Approach to the Assessment of Perchlorate Contamination. Invited presentation to the California Assembly Natural Resources Committee.

Hagemann, M.F., 2003. Perchlorate: A Cold War Legacy in Drinking Water. Presentation to a meeting of the National Groundwater Association.

Hagemann, M.F., 2002. From Tank to Tap: A Chronology of MTBE in Groundwater. Presentation to a meeting of the National Groundwater Association.

Hagemann, M.F., 2002. A Chronology of MTBE in Groundwater and an Estimate of Costs to Address Impacts to Groundwater. Presentation to the annual meeting of the Society of Environmental Journalists.

Hagemann, M.F., 2002. An Estimate of the Cost to Address MTBE Contamination in Groundwater (and Who Will Pay). Presentation to a meeting of the National Groundwater Association.

Hagemann, M.F., 2002. An Estimate of Costs to Address MTBE Releases from Underground Storage Tanks and the Resulting Impact to Drinking Water Wells. Presentation to a meeting of the U.S. EPA and State Underground Storage Tank Program managers.

Hagemann, M.F., 2001. From Tank to Tap: A Chronology of MTBE in Groundwater. Unpublished report.

Hagemann, M.F., 2001. Estimated Cleanup Cost for MTBE in Groundwater Used as Drinking Water. Unpublished report.

Hagemann, M.F., 2001. Estimated Costs to Address MTBE Releases from Leaking Underground Storage Tanks.

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Unpublished report.

Hagemann, M.F., and VanMouwerik, M., 1999. Potential Water Concerns Related to Snowmobile Usage. Water Resources Division, National Park Service, Technical Report.

VanMouwerik, M. and **Hagemann, M.F.** 1999, Water Quality Concerns Related to Personal Watercraft Usage. Water Resources Division, National Park Service, Technical Report.

Hagemann, M.F., 1999, Is Dilution the Solution to Pollution in National Parks? The George Wright Society Biannual Meeting, Asheville, North Carolina.

Hagemann, M.F., 1997, The Potential for MTBE to Contaminate Groundwater. U.S. EPA Superfund Groundwater Technical Forum Annual Meeting, Las Vegas, Nevada.

Hagemann, M.F., and Gill, M., 1996, Impediments to Intrinsic Remediation, Moffett Field Naval Air Station, Conference on Intrinsic Remediation of Chlorinated Hydrocarbons, Salt Lake City.

Hagemann, M.F., Fukunaga, G.L., 1996, The Vulnerability of Groundwater to Anthropogenic Contaminants on the Island of Maui, Hawaii. Hawaii Water Works Association Annual Meeting, Maui, October 1996.

Hagemann, M. F., Fukunaga, G. L., 1996, Ranking Groundwater Vulnerability in Central Oahu, Hawaii. Proceedings, Geographic Information Systems in Environmental Resources Management, Air and Waste Management Association Publication VIP-61.

Hagemann, M.F., 1994. Groundwater Characterization and Cleanup at Closing Military Bases in California. Proceedings, California Groundwater Resources Association Meeting.

Hagemann, M.F. and Sabol, M.A., 1993. Role of the U.S. EPA in the High Plains States Groundwater Recharge Demonstration Program. Proceedings, Sixth Biennial Symposium on the Artificial Recharge of Groundwater.

Hagemann, M.F., 1993. U.S. EPA Policy on the Technical Impracticability of the Cleanup of DNAPL-contaminated Groundwater. California Groundwater Resources Association Meeting.

Hagemann, M.F., 1992. Dense Nonaqueous Phase Liquid Contamination of Groundwater: An Ounce of Prevention... Proceedings, Association of Engineering Geologists Annual Meeting, v. 35.

Other Experience:

Selected as subject matter expert for the California Professional Geologist licensing examinations, 2009-2011.

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Technical Consultation, Data Analysis and
Litigation Support for the Environment

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Paul Rosenfeld, Ph.D.

Principal Environmental Chemist

Chemical Fate and Transport & Air Dispersion Modeling

Risk Assessment & Remediation Specialist

Education

Ph.D. Soil Chemistry, University of Washington, 1999. Dissertation on volatile organic compound filtration.

M.S. Environmental Science, U.C. Berkeley, 1995. Thesis on organic waste economics.

B.A. Environmental Studies, U.C. Santa Barbara, 1991. Focus on wastewater treatment.

Professional Experience

Dr. Rosenfeld has over 25 years of experience conducting environmental investigations and risk assessments for evaluating impacts to human health, property, and ecological receptors. His expertise focuses on the fate and transport of environmental contaminants, human health risk, exposure assessment, and ecological restoration. Dr. Rosenfeld has evaluated and modeled emissions from oil spills, landfills, boilers and incinerators, process stacks, storage tanks, confined animal feeding operations, industrial, military and agricultural sources, unconventional oil drilling operations, and locomotive and construction engines. His project experience ranges from monitoring and modeling of pollution sources to evaluating impacts of pollution on workers at industrial facilities and residents in surrounding communities. Dr. Rosenfeld has also successfully modeled exposure to contaminants distributed by water systems and via vapor intrusion.

Dr. Rosenfeld has investigated and designed remediation programs and risk assessments for contaminated sites containing lead, heavy metals, mold, bacteria, particulate matter, petroleum hydrocarbons, chlorinated solvents, pesticides, radioactive waste, dioxins and furans, semi- and volatile organic compounds, PCBs, PAHs, creosote, perchlorate, asbestos, per- and poly-fluoroalkyl substances (PFOA/PFOS), unusual polymers, fuel oxygenates (MTBE), among other pollutants. Dr. Rosenfeld also has experience evaluating greenhouse gas emissions from various projects and is an expert on the assessment of odors from industrial and agricultural sites, as well as the evaluation of odor nuisance impacts and technologies for abatement of odorous emissions. As a principal scientist at SWAPE, Dr. Rosenfeld directs air dispersion modeling and exposure assessments. He has served as an expert witness and testified about pollution sources causing nuisance and/or personal injury at sites and has testified as an expert witness on numerous cases involving exposure to soil, water and air contaminants from industrial, railroad, agricultural, and military sources.

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Professional History:

Soil Water Air Protection Enterprise (SWAPE); 2003 to present; Principal and Founding Partner
UCLA School of Public Health; 2007 to 2011; Lecturer (Assistant Researcher)
UCLA School of Public Health; 2003 to 2006; Adjunct Professor
UCLA Environmental Science and Engineering Program; 2002-2004; Doctoral Intern Coordinator
UCLA Institute of the Environment, 2001-2002; Research Associate
Komex H₂O Science, 2001 to 2003; Senior Remediation Scientist
National Groundwater Association, 2002-2004; Lecturer
San Diego State University, 1999-2001; Adjunct Professor
Anteon Corp., San Diego, 2000-2001; Remediation Project Manager
Ogden (now Amec), San Diego, 2000-2000; Remediation Project Manager
Bechtel, San Diego, California, 1999 – 2000; Risk Assessor
King County, Seattle, 1996 – 1999; Scientist
James River Corp., Washington, 1995-96; Scientist
Big Creek Lumber, Davenport, California, 1995; Scientist
Plumas Corp., California and USFS, Tahoe 1993-1995; Scientist
Peace Corps and World Wildlife Fund, St. Kitts, West Indies, 1991-1993; Scientist

Publications:

Rosenfeld, P.E., Spaeth, K.R., McCarthy, S.J. *et al.* Camp Lejeune Marine Cancer Risk Assessment for Exposure to Contaminated Drinking Water From 1955 to 1987. *Water Air Soil Pollut* **235**, 124 (2024).
<https://doi.org/10.1007/s11270-023-06863-y>.

Rosenfeld P.E., Spaeth K.R., Remy L.L., Byers V., Muerth S.A., Hallman R.C., Summers-Evans J., Barker S. (2023) Perfluoroalkyl substances exposure in firefighters: Sources and implications, *Environmental Research*, Volume 220, <https://doi.org/10.1016/j.envres.2022.115164>.

Rosenfeld P.E. and Spaeth K.R., (2023) Authors' Response to Letter to the Editor from Bullock and Ramacciotti, *Water Air Soil Pollution* Volume 234, <https://doi.org/10.1007/s11270-023-06165-3>

Rosenfeld P. E., Spaeth K., Hallman R., Bressler R., Smith, G., (2022) Cancer Risk and Diesel Exhaust Exposure Among Railroad Workers. *Water Air Soil Pollution*. **233**, 171.

Remy, L.L., Clay T., Byers, V., **Rosenfeld P. E.** (2019) Hospital, Health, and Community Burden After Oil Refinery Fires, Richmond, California 2007 and 2012. *Environmental Health*. 18:48

Simons, R.A., Seo, Y. **Rosenfeld, P.**, (2015) Modeling the Effect of Refinery Emission On Residential Property Value. *Journal of Real Estate Research*. 27(3):321-342

Chen, J. A, Zapata A. R., Sutherland A. J., Molmen, D.R., Chow, B. S., Wu, L. E., **Rosenfeld, P. E.**, Hesse, R. C., (2012) Sulfur Dioxide and Volatile Organic Compound Exposure To A Community In Texas City Texas Evaluated Using Aermid and Empirical Data. *American Journal of Environmental Science*, 8(6), 622-632.

Rosenfeld, P.E. & Feng, L. (2011). *The Risks of Hazardous Waste*. Amsterdam: Elsevier Publishing.

Cheremisinoff, N.P., & **Rosenfeld, P.E.** (2011). *Handbook of Pollution Prevention and Cleaner Production: Best Practices in the Agrochemical Industry*, Amsterdam: Elsevier Publishing.

Gonzalez, J., Feng, L., Sutherland, A., Waller, C., Sok, H., Hesse, R., **Rosenfeld, P.** (2010). PCBs and Dioxins/Furans in Attic Dust Collected Near Former PCB Production and Secondary Copper Facilities in Sauget, IL. *Procedia Environmental Sciences*. 113–125.

Feng, L., Wu, C., Tam, L., Sutherland, A.J., Clark, J.J., **Rosenfeld, P.E.** (2010). Dioxin and Furan Blood Lipid and Attic Dust Concentrations in Populations Living Near Four Wood Treatment Facilities in the United States. *Journal of Environmental Health*. 73(6), 34-46.

Cheremisinoff, N.P., & **Rosenfeld, P.E.** (2010). *Handbook of Pollution Prevention and Cleaner Production: Best Practices in the Wood and Paper Industries*. Amsterdam: Elsevier Publishing.

Cheremisinoff, N.P., & **Rosenfeld, P.E.**, (2009). *Handbook of Pollution Prevention and Cleaner Production: Best Practices in the Petroleum Industry*. Amsterdam: Elsevier Publishing.

Wu, C., Tam, L., Clark, J., **Rosenfeld, P.** (2009). Dioxin and furan blood lipid concentrations in populations living near four wood treatment facilities in the United States. *WIT Transactions on Ecology and the Environment, Air Pollution*, 123 (17), 319-327.

Cheremisinoff, N.P., **Rosenfeld, P.E.** Davletshin, A.R. (2008). *Responsible Care*. Gulf Publishing. Texas.

Tam L. K., Wu C. D., Clark J. J. and **Rosenfeld, P.E.** (2008). A Statistical Analysis Of Attic Dust And Blood Lipid Concentrations Of Tetrachloro-p-Dibenzodioxin (TCDD) Toxicity Equivalency Quotients (TEQ) In Two Populations Near Wood Treatment Facilities. *Organohalogen Compounds*, 70, 002252-002255.

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Hensley, A.R. A. Scott, J. J. J. Clark, **Rosenfeld, P.E.** (2007). Attic Dust and Human Blood Samples Collected near a Former Wood Treatment Facility. *Environmental Research*. 105, 194-197.

Rosenfeld, P.E., J. J. J. Clark, A. R. Hensley, M. Suffet. (2007). The Use of an Odor Wheel Classification for Evaluation of Human Health Risk Criteria for Compost Facilities. *Water Science & Technology* 55(5), 345-357.

Rosenfeld, P. E., M. Suffet. (2007). The Anatomy of Odour Wheels for Odours of Drinking Water, Wastewater, Compost And The Urban Environment. *Water Science & Technology* 55(5), 335-344.

Sullivan, P. J. Clark, J.J.J., Agardy, F. J., **Rosenfeld, P.E.** (2007). *Toxic Legacy, Synthetic Toxins in the Food, Water, and Air in American Cities*. Boston Massachusetts: Elsevier Publishing

Rosenfeld, P.E., and Suffet I.H. (2004). Control of Compost Odor Using High Carbon Wood Ash. *Water Science and Technology*. 49(9),171-178.

Rosenfeld P. E., J.J. Clark, I.H. (Mel) Suffet (2004). The Value of An Odor-Quality-Wheel Classification Scheme for The Urban Environment. *Water Environment Federation's Technical Exhibition and Conference (WEFTEC) 2004*. New Orleans, October 2-6, 2004.

Rosenfeld, P.E., and Suffet, I.H. (2004). Understanding Odorants Associated with Compost, Biomass Facilities, and the Land Application of Biosolids. *Water Science and Technology*. 49(9), 193-199.

Rosenfeld, P.E., and Suffet I.H. (2004). Control of Compost Odor Using High Carbon Wood Ash, *Water Science and Technology*, 49(9), 171-178.

Rosenfeld, P. E., Grey, M. A., Sellev, P. (2004). Measurement of Biosolids Odor and Odorant Emissions from Windrows, Static Pile and Biofilter. *Water Environment Research*. 76(4), 310-315.

Rosenfeld, P.E., Grey, M and Suffet, M. (2002). Compost Demonstration Project, Sacramento California Using High-Carbon Wood Ash to Control Odor at a Green Materials Composting Facility. *Integrated Waste Management Board Public Affairs Office, Publications Clearinghouse (MS-6)*, Sacramento, CA Publication #442-02-008.

Rosenfeld, P.E., and C.L. Henry. (2001). Characterization of odor emissions from three different biosolids. *Water Soil and Air Pollution*. 127(1-4), 173-191.

Rosenfeld, P.E., and Henry C. L., (2000). Wood ash control of odor emissions from biosolids application. *Journal of Environmental Quality*. 29, 1662-1668.

Rosenfeld, P.E., C.L. Henry and D. Bennett. (2001). Wastewater dewatering polymer affects on biosolids odor emissions and microbial activity. *Water Environment Research*. 73(4), 363-367.

Rosenfeld, P.E., and C.L. Henry. (2001). Activated Carbon and Wood Ash Sorption of Wastewater, Compost, and Biosolids Odorants. *Water Environment Research*, 73, 388-393.

Rosenfeld, P.E., and Henry C. L., (2001). High carbon wood ash effect on biosolids microbial activity and odor. *Water Environment Research*. 131(1-4), 247-262.

Chollack, T. and **P. Rosenfeld**. (1998). Compost Amendment Handbook for Landscaping. Prepared for and distributed by the City of Redmond, Washington State.

Rosenfeld, P. E. (1992). The Mount Liamuiga Crater Trail. *Heritage Magazine of St. Kitts*, 3(2).

Rosenfeld, P. E. (1993). High School Biogas Project to Prevent Deforestation on St. Kitts. *Biomass Users Network*, 7(1).

Rosenfeld, P. E. (1998). Characterization, Quantification, and Control of Odor Emissions from Biosolids Application To Forest Soil. Doctoral Thesis. University of Washington College of Forest Resources.

Rosenfeld, P. E. (1994). Potential Utilization of Small Diameter Trees on Sierra County Public Land. Master's thesis reprinted by the Sierra County Economic Council. Sierra County, California.

Rosenfeld, P. E. (1991). How to Build a Small Rural Anaerobic Digester & Uses Of Biogas In The First And Third World. Bachelor's Thesis. University of California.

Presentations:

Rosenfeld, P.E., "The science for Perfluorinated Chemicals (PFAS): What makes remediation so hard?" Law Seminars International, (May 9-10, 2018) 800 Fifth Avenue, Suite 101 Seattle, WA.

Rosenfeld, P.E., Sutherland, A; Hesse, R.; Zapata, A. (October 3-6, 2013). Air dispersion modeling of volatile organic emissions from multiple natural gas wells in Decatur, TX. *44th Western Regional Meeting, American Chemical Society*. Lecture conducted from Santa Clara, CA.

Sok, H.L.; Waller, C.C.; Feng, L.; Gonzalez, J.; Sutherland, A.J.; Wisdom-Stack, T.; Sahai, R.K.; Hesse, R.C.; **Rosenfeld, P.E.** (June 20-23, 2010). Atrazine: A Persistent Pesticide in Urban Drinking Water. *Urban Environmental Pollution*. Lecture conducted from Boston, MA.

Feng, L.; Gonzalez, J.; Sok, H.L.; Sutherland, A.J.; Waller, C.C.; Wisdom-Stack, T.; Sahai, R.K.; La, M.; Hesse, R.C.; **Rosenfeld, P.E.** (June 20-23, 2010). Bringing Environmental Justice to East St. Louis, Illinois. *Urban Environmental Pollution*. Lecture conducted from Boston, MA.

Rosenfeld, P.E. (April 19-23, 2009). Perfluorooctanoic Acid (PFOA) and Perfluorooctane Sulfonate (PFOS) Contamination in Drinking Water From the Use of Aqueous Film Forming Foams (AFFF) at Airports in the United States. *2009 Ground Water Summit and 2009 Ground Water Protection Council Spring Meeting*, Lecture conducted from Tuscon, AZ.

Rosenfeld, P.E. (April 19-23, 2009). Cost to Filter Atrazine Contamination from Drinking Water in the United States” Contamination in Drinking Water From the Use of Aqueous Film Forming Foams (AFFF) at Airports in the United States. *2009 Ground Water Summit and 2009 Ground Water Protection Council Spring Meeting*. Lecture conducted from Tuscon, AZ.

Wu, C., Tam, L., Clark, J., **Rosenfeld, P.** (20-22 July (2009). Dioxin and furan blood lipid concentrations in populations living near four wood treatment facilities in the United States. Brebbia, C.A. and Popov, V., eds., *Air Pollution XVII: Proceedings of the Seventeenth International Conference on Modeling, Monitoring and Management of Air Pollution*. Lecture conducted from Tallinn, Estonia.

Rosenfeld, P. E. (October 15-18, 2007). Moss Point Community Exposure To Contaminants From A Releasing Facility. *The 23rd Annual International Conferences on Soils Sediment and Water*. Platform lecture conducted at University of Massachusetts, Amherst MA.

Rosenfeld, P. E. (October 15-18, 2007). The Repeated Trespass of Tritium-Contaminated Water Into A Surrounding Community Form Repeated Waste Spills From A Nuclear Power Plant. *The 23rd Annual International Conferences on Soils Sediment and Water*. Platform lecture conducted from University of Massachusetts, Amherst MA.

Rosenfeld, P. E. (October 15-18, 2007). Somerville Community Exposure To Contaminants From Wood Treatment Facility Emissions. *The 23rd Annual International Conferences on Soils Sediment and Water*. Lecture conducted from University of Massachusetts, Amherst MA.

Rosenfeld P. E. (March 2007). Production, Chemical Properties, Toxicology, & Treatment Case Studies of 1,2,3-Trichloropropane (TCP). *The Association for Environmental Health and Sciences (AEHS) Annual Meeting*. Lecture conducted from San Diego, CA.

Rosenfeld P. E. (March 2007). Blood and Attic Sampling for Dioxin/Furan, PAH, and Metal Exposure in Florala, Alabama. *The AEHS Annual Meeting*. Lecture conducted from San Diego, CA.

Hensley A.R., Scott, A., **Rosenfeld P.E.**, Clark, J.J.J. (August 21 – 25, 2006). Dioxin Containing Attic Dust And Human Blood Samples Collected Near A Former Wood Treatment Facility. *The 26th International Symposium on Halogenated Persistent Organic Pollutants – DIOXIN2006*. Lecture conducted from Radisson SAS Scandinavia Hotel in Oslo Norway.

Hensley A.R., Scott, A., **Rosenfeld P.E.**, Clark, J.J.J. (November 4-8, 2006). Dioxin Containing Attic Dust And Human Blood Samples Collected Near A Former Wood Treatment Facility. *APHA 134 Annual Meeting & Exposition*. Lecture conducted from Boston Massachusetts.

Paul Rosenfeld Ph.D. (October 24-25, 2005). Fate, Transport and Persistence of PFOA and Related Chemicals. Mealey’s C8/PFOA. *Science, Risk & Litigation Conference*. Lecture conducted from The Rittenhouse Hotel, Philadelphia, PA.

Paul Rosenfeld Ph.D. (September 19, 2005). Brominated Flame Retardants in Groundwater: Pathways to Human Ingestion, *Toxicology and Remediation PEMA Emerging Contaminant Conference*. Lecture conducted from Hilton Hotel, Irvine California.

Paul Rosenfeld Ph.D. (September 19, 2005). Fate, Transport, Toxicity, And Persistence of 1,2,3-TCP. *PEMA Emerging Contaminant Conference*. Lecture conducted from Hilton Hotel in Irvine, California.

Paul Rosenfeld Ph.D. (September 26-27, 2005). Fate, Transport and Persistence of PDBEs. *Mealey’s Groundwater Conference*. Lecture conducted from Ritz Carlton Hotel, Marina Del Ray, California.

Paul Rosenfeld Ph.D. (June 7-8, 2005). Fate, Transport and Persistence of PFOA and Related Chemicals. *International Society of Environmental Forensics: Focus on Emerging Contaminants*. Lecture conducted from Sheraton Oceanfront Hotel, Virginia Beach, Virginia.

Paul Rosenfeld Ph.D. (July 21-22, 2005). Fate Transport, Persistence and Toxicology of PFOA and Related Perfluorochemicals. *2005 National Groundwater Association Ground Water and Environmental Law Conference*. Lecture conducted from Wyndham Baltimore Inner Harbor, Baltimore Maryland.

Paul Rosenfeld Ph.D. (July 21-22, 2005). Brominated Flame Retardants in Groundwater: Pathways to Human Ingestion, Toxicology and Remediation. *2005 National Groundwater Association Ground Water and Environmental Law Conference*. Lecture conducted from Wyndham Baltimore Inner Harbor, Baltimore Maryland.

Paul Rosenfeld, Ph.D. and James Clark Ph.D. and Rob Hesse R.G. (May 5-6, 2004). Tert-butyl Alcohol Liability and Toxicology, A National Problem and Unquantified Liability. *National Groundwater Association. Environmental Law Conference*. Lecture conducted from Congress Plaza Hotel, Chicago Illinois.

Paul Rosenfeld, Ph.D. (March 2004). Perchlorate Toxicology. *Meeting of the American Groundwater Trust*. Lecture conducted from Phoenix Arizona.

Hagemann, M.F., **Paul Rosenfeld, Ph.D.** and Rob Hesse (2004). Perchlorate Contamination of the Colorado River. *Meeting of tribal representatives*. Lecture conducted from Parker, AZ.

Paul Rosenfeld, Ph.D. (April 7, 2004). A National Damage Assessment Model for PCE and Dry Cleaners. *Drycleaner Symposium. California Ground Water Association*. Lecture conducted from Radison Hotel, Sacramento, California.

Rosenfeld, P. E., Grey, M., (June 2003) Two stage biofilter for biosolids composting odor control. *Seventh International In Situ And On Site Bioremediation Symposium Battelle Conference Orlando, FL*.

Paul Rosenfeld, Ph.D. and James Clark Ph.D. (February 20-21, 2003) Understanding Historical Use, Chemical Properties, Toxicity and Regulatory Guidance of 1,4 Dioxane. *National Groundwater Association. Southwest Focus Conference. Water Supply and Emerging Contaminants*. Lecture conducted from Hyatt Regency Phoenix Arizona.

Paul Rosenfeld, Ph.D. (February 6-7, 2003). Underground Storage Tank Litigation and Remediation. *California CUPA Forum*. Lecture conducted from Marriott Hotel, Anaheim California.

Paul Rosenfeld, Ph.D. (October 23, 2002) Underground Storage Tank Litigation and Remediation. *EPA Underground Storage Tank Roundtable*. Lecture conducted from Sacramento California.

Rosenfeld, P.E. and Suffet, M. (October 7- 10, 2002). Understanding Odor from Compost, *Wastewater and Industrial Processes. Sixth Annual Symposium on Off Flavors in the Aquatic Environment. International Water Association*. Lecture conducted from Barcelona Spain.

Rosenfeld, P.E. and Suffet, M. (October 7- 10, 2002). Using High Carbon Wood Ash to Control Compost Odor. *Sixth Annual Symposium on Off Flavors in the Aquatic Environment. International Water Association*. Lecture conducted from Barcelona Spain.

Rosenfeld, P.E. and Grey, M. A. (September 22-24, 2002). Biocycle Composting for Coastal Sage Restoration. *Northwest Biosolids Management Association*. Lecture conducted from Vancouver Washington.

Rosenfeld, P.E. and Grey, M. A. (November 11-14, 2002). Using High-Carbon Wood Ash to Control Odor at a Green Materials Composting Facility. *Soil Science Society Annual Conference*. Lecture conducted from Indianapolis, Maryland.

Rosenfeld, P.E. (September 16, 2000). Two stage biofilter for biosolids composting odor control. *Water Environment Federation*. Lecture conducted from Anaheim California.

Rosenfeld, P.E. (October 16, 2000). Wood ash and biofilter control of compost odor. *Biofest*. Lecture conducted from Ocean Shores, California.

Rosenfeld, P.E. (2000). Bioremediation Using Organic Soil Amendments. *California Resource Recovery Association*. Lecture conducted from Sacramento California.

Rosenfeld, P.E., C.L. Henry, R. Harrison. (1998). Oat and Grass Seed Germination and Nitrogen and Sulfur Emissions Following Biosolids Incorporation with High-Carbon Wood-Ash. *Water Environment Federation 12th Annual Residuals and Biosolids Management Conference Proceedings*. Lecture conducted from Bellevue Washington.

Rosenfeld, P.E., and C.L. Henry. (1999). An evaluation of ash incorporation with biosolids for odor reduction. *Soil Science Society of America*. Lecture conducted from Salt Lake City Utah.

Rosenfeld, P.E., C.L. Henry, R. Harrison. (1998). Comparison of Microbial Activity and Odor Emissions from Three Different Biosolids Applied to Forest Soil. *Brown and Caldwell*. Lecture conducted from Seattle Washington.

Rosenfeld, P.E., C.L. Henry. (1998). Characterization, Quantification, and Control of Odor Emissions from Biosolids Application To Forest Soil. *Biofest*. Lecture conducted from Lake Chelan, Washington.

Rosenfeld, P.E., C.L. Henry, R. Harrison. (1998). Oat and Grass Seed Germination and Nitrogen and Sulfur Emissions Following Biosolids Incorporation with High-Carbon Wood-Ash. *Water Environment Federation 12th Annual Residuals and Biosolids Management Conference Proceedings*. Lecture conducted from Bellevue Washington.

Rosenfeld, P.E., C.L. Henry, R. B. Harrison, and R. Dills. (1997). Comparison of Odor Emissions from Three Different Biosolids Applied to Forest Soil. *Soil Science Society of America*. Lecture conducted from Anaheim California.

Teaching Experience:

UCLA Department of Environmental Health (Summer 2003 through 20010) Taught Environmental Health Science 100 to students, including undergrad, medical doctors, public health professionals and nurses. The course focused on the health effects of environmental contaminants.

National Ground Water Association, Successful Remediation Technologies. Custom Course in Sante Fe, New Mexico. May 21, 2002. Focused on fate and transport of fuel contaminants associated with underground storage tanks.

National Ground Water Association; Successful Remediation Technologies Course in Chicago Illinois. April 1, 2002. Focused on fate and transport of contaminants associated with Superfund and RCRA sites.

California Integrated Waste Management Board, April and May 2001. Alternative Landfill Caps Seminar in San Diego, Ventura, and San Francisco. Focused on both prescriptive and innovative landfill cover design.

UCLA Department of Environmental Engineering, February 5, 2002. Seminar on Successful Remediation Technologies focusing on Groundwater Remediation.

University Of Washington, Soil Science Program, Teaching Assistant for several courses including Soil Chemistry, Organic Soil Amendments, and Soil Stability.

U.C. Berkeley, Environmental Science Program Teaching Assistant for Environmental Science 10.

Academic Grants Awarded:

California Integrated Waste Management Board. \$41,000 grant awarded to UCLA Institute of the Environment. Goal: To investigate the effect of high carbon wood ash on volatile organic emissions from compost. 2001.

Synagro Technologies, Corona California: \$10,000 grant awarded to San Diego State University.
Goal: investigate the effect of biosolids for restoration and remediation of degraded coastal sage soils. 2000.

King County, Department of Research and Technology, Washington State. \$100,000 grant awarded to University of Washington: Goal: To investigate odor emissions from biosolids application and the effect of polymers and ash on VOC emissions. 1998.

Northwest Biosolids Management Association, Washington State. \$20,000 grant awarded to investigate the effect of polymers and ash on VOC emissions from biosolids. 1997.

James River Corporation, Oregon: \$10,000 grant was awarded to investigate the success of genetically engineered Poplar trees with resistance to round-up. 1996.

United State Forest Service, Tahoe National Forest: \$15,000 grant was awarded to investigating fire ecology of the Tahoe National Forest. 1995.

Kellogg Foundation, Washington D.C. \$500 grant was awarded to construct a large anaerobic digester on St. Kitts in West Indies. 1993

Deposition and/or Trial Testimony:

In the District Court of Harris County Texas
Mt Davis Interest, Inc v Sesco Cement Corp
Cause No 2023-26512
Trial 6-6-25

In the United States Southern District of New York
Gallo vs Avon Products Inc., et al
Civil Action No.: 1:23-cv-2023
Deposition 4-24-2025

In Vanderburgh Superior Court 5, County of Vanderburgh, Indiana
Markello v CSX
Civil Action No 82D05-2011-CT-004962
Deposition 3-26-25

In the Circuit Court of Cook County Illinois
Jarosiewicz v Northeast Regional Railroad
Case No 2023 L 002290
Deposition 2-27-25

In the District Court 191st Judicial District Dallas County
Acklin v Poly America International
Cause No DC-22-08610
Deposition 1-8-2025

United States District Court, Norther District of California
Asustin Vs Monsanto
Case No 2:23-cv-272
Deposition 12-20-25

In Jefferson Circuit Court Division One, Louisville, Kentucky
Stafford vs, CSX
Case No. 18-CI-001790

Deposition: 8-27-24

In the Twenty-Second Judicial Circuit of St. Louis. State of Missouri
Patricia Godfrey vs, Amtrak
Case No. 2122-CC-00525
Deposition: 7-17-24

In the Circuit Court of Jefferson County Alabama
Linda Early Vs. CSX
Case number CV-2021-00241
Deposition 6-24-24

In the Court of Common Pleas Lucas County, Ohio
Brenda Conkright vs. CSX
Case No. G-4801-CI-0202102664-000
Deposition: 6-4-24

In the Commonwealth of Kentucky, Greenup Circuit Court
Patsy Sue Napier vs. CSX
Case No. 19-CI-0012
Deposition: 5-8-2-24

In United States District Court of Hawaii
Patrick Feindt, Jr. et al. vs. The United States of America
Case No. 1:22-cv-LEK-KJM
Trial 3-29-24 and 4-5-24

In the District Court of Hood County State of Texas
Artie Gray vs. Exxon Mobil
Case No. C-2018047
Rosenfeld Deposition:4-22-2024

In the Elkhart Superior Court State of Indiana
Estate of Clark Stacy vs. Penn Central Corporation
Cause No 2D01-2001-CT-00007
Rosenfeld Deposition 1-25-2024 and 3-7-2024

In the Circuit Court of Trempealeau County, State of Wisconsin
Michael J. Sylla et al. vs. High-Crush Whitehall LLC
Case No. 2019-CV-63, 2019-CV-64, 2019-CV-65, 2019-CV-66
Rosenfeld Deposition: 3-5-2024

In the Circuit Court of Trempealeau County, State of Wisconsin
Leland Drangstveit vs. High-Crush Blair LLC
Case No. 19-CV-66
Rosenfeld Deposition 3-5-2024

In the Circuit Court of Jefferson County Alabama
Donald Lee Ashworth vs. CSX Transportation Inc.
Case No CV-2021-901261
Rosenfeld Deposition 1-23-2024

In the United States District Court for the Eastern District of Wisconsin
Gary L Siepe vs. Soo Line Railroad
Case No. 2:21-cv-00919
Rosenfeld Deposition 1-19-2024

In the United States District Court for the Western District of Louisiana
Ricky Bush v. Clean Harbors Colfax LLC
Case No. 1:22-cv-02026-DDD-JPM
Rosenfeld Deposition 12-18-2023 and 1-15-2024

In United States District Court of Hawaii
Patrick Feindt, Jr. et al. vs. The United States of America
Case No. 1:22-cv-LEK-KJM
Rosenfeld Deposition 11-29-2023

In the Circuit Court for the Twentieth Judicial Circuit St. Clair County, Illinois
Timothy Gray vs. Rural King et al.
Case No 2022-LA-355
Rosenfeld Deposition 9-26-2023

In United States District Court Eastern District of Wisconsin
Gary L. Siepe vs. Soo Line Railroad Company
Case No. 2:21-cv-00919
Rosenfeld Deposition 9-15-2023

In the Circuit Court of Cook County Illinois
Donald Fox vs. BNSF
Case No. 2021 L12
Rosenfeld Deposition 9-12-2023

In the Court of Common Pleas Cuyahoga County, Ohio
Thomas Schleich vs. Penn Central Corporation
Lead Case No. CV-20-939184
Rosenfeld Deposition 8-27-2023

In the Circuit Court of Jackson County Missouri at Kansas City
Timothy Dalsing vs. BNSF
Case No. No. 2216-cv06539
Rosenfeld Deposition 7-28-2023

In the United States District Court for the Southern District of Texas Houston Division
International Terminals Company LLC Deer Park Fire Litigation
Lead Case No. 4:19-cv-01460
Rosenfeld Deposition 7-25-2023

In the Circuit Court of Livingston County Missouri
Shirley Ralls vs. Canadian Pacific Railway and Soo Lind Railroad
Case No. 28LV-CV0020
Rosenfeld Daubert Hearing 7-18-2023 Trial Testimony 7-19-2023

In the Circuit Court of Cook County Illinois
Brenda Wright vs. Penn Central and Conrail
Case No. No. 2032L003966
Rosenfeld Deposition 6-13-2023

In the Circuit Court Common Pleas Philadelphia of Jefferson County Alabama
Frank Belle vs. Birmingham Southern Railroad Company et al.
Case No. 01-cv-2021-900901.00
Rosenfeld Deposition 4-6-2023

03.19

In the Circuit Court of Jefferson County Alabama
Linda De Gregorio vs. Penn Central
Case No. 002278
Rosenfeld Deposition 3-27-20203

In the United States District Court Eastern District of New York
Rosalie Romano et al. vs. Northrup Grumman Corporation
Case No. 16-cv-5760
Rosenfeld Deposition 3-16-2023

In the Superior Court of Washington, Spokane County
Judy Cundy vs. BNSF
Case No. 21-2-03718-32
Rosenfeld Deposition 3-9-2023

In The Court of Common Pleas of Philadelphia County, PA Civil Trial Division
Feaster v Conrail
Case No. 001075
Rosenfeld Deposition 2-1-2023

In United States District Court for the Central District of Illinois
Sherman vs. BNSF
Case No. 3:17-cv-01192
Rosenfeld Deposition 1-18-2023

In United States District Court District of Colorado
Gonzales vs. BNSF
Case No. 1:21-cv-01690
Rosenfeld Deposition 1-17-2023

In United States District Court District of Colorado
Abeyta vs. BNSF
Case No. 1:21-cv-01689-KMT
Rosenfeld Deposition 1-3-2023

In United States District Court For The Easter District of Louisiana
Nathaniel Smith vs. Illinois Central Railroad
Case No. 2:21-cv-01235
Rosenfeld Deposition 11-30-2022

In the Superior Court of the State of California, County of San Bernardino
Billy Wildrick, Plaintiff vs. BNSF Railway Company
Case No. CIVDS1711810
Rosenfeld Deposition 10-17-2022

In the State Court of Bibb County, State of Georgia
Richard Hutcherson, Plaintiff vs Norfolk Southern Railway Company
Case No. 10-SCCV-092007
Rosenfeld Deposition 10-6-2022

In the Civil District Court of the Parish of Orleans, State of Louisiana
Millard Clark, Plaintiff vs. Dixie Carriers, Inc. et al.
Case No. 2020-03891
Rosenfeld Deposition 9-15-2022

In The Circuit Court of Livingston County, State of Missouri, Circuit Civil Division

Shirley Ralls, Plaintiff vs. Canadian Pacific Railway and Soo Line Railroad
Case No. 18-LV-CC0020
Rosenfeld Deposition 9-7-2022

In The Circuit Court of the 13th Judicial Circuit Court, Hillsborough County, Florida Civil Division
Jonny C. Daniels, Plaintiff vs. CSX Transportation Inc.
Case No. 20-CA-5502
Rosenfeld Deposition 9-1-2022

In The Circuit Court of St. Louis County, State of Missouri
Kieth Luke et. al. Plaintiff vs. Monsanto Company et. al.
Case No. 19SL-CC03191
Rosenfeld Deposition 8-25-2022

In The Circuit Court of the 13th Judicial Circuit Court, Hillsborough County, Florida Civil Division
Jeffery S. Lamotte, Plaintiff vs. CSX Transportation Inc.
Case No. NO. 20-CA-0049
Rosenfeld Deposition 8-22-2022

In State of Minnesota District Court, County of St. Louis Sixth Judicial District
Greg Bean, Plaintiff vs. Soo Line Railroad Company
Case No. 69-DU-CV-21-760
Rosenfeld Deposition 8-17-2022

In United States District Court Western District of Washington at Tacoma, Washington
John D. Fitzgerald Plaintiff vs. BNSF
Case No. 3:21-cv-05288-RJB
Rosenfeld Deposition 8-11-2022

In Circuit Court of the Sixth Judicial Circuit, Macon Illinois
Rocky Bennyhoff Plaintiff vs. Norfolk Southern
Case No. 20-L-56
Rosenfeld Deposition 8-3-2022, Trial 1-10-2023

In Court of Common Pleas, Hamilton County Ohio
Joe Briggins Plaintiff vs. CSX
Case No. A2004464
Rosenfeld Deposition 6-17-2022

In the Superior Court of the State of California, County of Kern
George LaFazia vs. BNSF Railway Company.
Case No. BCV-19-103087
Rosenfeld Deposition 5-17-2022

In the Circuit Court of Cook County Illinois
Bobby Earles vs. Penn Central et. al.
Case No. 2020-L-000550
Rosenfeld Deposition 4-16-2022

In United States District Court Easter District of Florida
Albert Hartman Plaintiff vs. Illinois Central
Case No. 2:20-cv-1633
Rosenfeld Deposition 4-4-2022

In the Circuit Court of the 4th Judicial Circuit, in and For Duval County, Florida
Barbara Steele vs. CSX Transportation

Case No.16-219-Ca-008796
Rosenfeld Deposition 3-15-2022

In United States District Court Easter District of New York
Romano et al. vs. Northrup Grumman Corporation
Case No. 16-cv-5760
Rosenfeld Deposition 3-10-2022

In the Circuit Court of Cook County Illinois
Linda Benjamin vs. Illinois Central
Case No. No. 2019 L 007599
Rosenfeld Deposition 1-26-2022

In the Circuit Court of Cook County Illinois
Donald Smith vs. Illinois Central
Case No. No. 2019 L 003426
Rosenfeld Deposition 1-24-2022

In the Circuit Court of Cook County Illinois
Jan Holeman vs. BNSF
Case No. 2019 L 000675
Rosenfeld Deposition 1-18-2022

In the State Court of Bibb County State of Georgia
Dwayne B. Garrett vs. Norfolk Southern
Case No. 20-SCCV-091232
Rosenfeld Deposition 11-10-2021

In the Circuit Court of Cook County Illinois
Joseph Ruepke vs. BNSF
Case No. 2019 L 007730
Rosenfeld Deposition 11-5-2021

In the United States District Court For the District of Nebraska
Steven Gillett vs. BNSF
Case No. 4:20-cv-03120
Rosenfeld Deposition 10-28-2021

In the Montana Thirteenth District Court of Yellowstone County
James Eadus vs. Soo Line Railroad and BNSF
Case No. DV 19-1056
Rosenfeld Deposition 10-21-2021

In the Circuit Court Of The Twentieth Judicial Circuit, St Clair County, Illinois
Martha Custer et al. vs Cerro Flow Products, Inc.
Case No. 0i9-L-2295
Rosenfeld Deposition 5-14-2021
Trial October 8-4-2021

In the Circuit Court of Cook County Illinois
Joseph Rafferty vs. Consolidated Rail Corporation and National Railroad Passenger Corporation d/b/a
AMTRAK,
Case No. 18-L-6845
Rosenfeld Deposition 6-28-2021

In the United States District Court For the Northern District of Illinois

Theresa Romcoe vs. Northeast Illinois Regional Commuter Railroad Corporation d/b/a METRA Rail
Case No. 17-cv-8517
Rosenfeld Deposition 5-25-2021

In the Superior Court of the State of Arizona In and For the County of Maricopa
Mary Tryon et al. vs. The City of Phoenix v. Cox Cactus Farm, L.L.C., Utah Shelter Systems, Inc.
Case No. CV20127-094749
Rosenfeld Deposition 5-7-2021

In the United States District Court for the Eastern District of Texas Beaumont Division
Robinson, Jeremy et al vs. CNA Insurance Company et al.
Case No. 1:17-cv-000508
Rosenfeld Deposition 3-25-2021

In the Superior Court of the State of California, County of San Bernardino
Gary Garner, Personal Representative for the Estate of Melvin Garner vs. BNSF Railway Company.
Case No. 1720288
Rosenfeld Deposition 2-23-2021

In the Superior Court of the State of California, County of Los Angeles, Spring Street Courthouse
Benny M Rodriguez vs. Union Pacific Railroad, A Corporation, et al.
Case No. 18STCV01162
Rosenfeld Deposition 12-23-2020

In the Circuit Court of Jackson County, Missouri
Karen Cornwell, Plaintiff, vs. Marathon Petroleum, LP, Defendant.
Case No. 1716-CV10006
Rosenfeld Deposition 8-30-2019

In the United States District Court For The District of New Jersey
Duarte et al, Plaintiffs, vs. United States Metals Refining Company et. al. Defendant.
Case No. 2:17-cv-01624-ES-SCM
Rosenfeld Deposition 6-7-2019

In the United States District Court of Southern District of Texas Galveston Division
M/T Carla Maersk vs. Conti 168., Schiffahrts-GMBH & Co. Bulker KG MS “Conti Perdido” Defendant.
Case No. 3:15-CV-00106 consolidated with 3:15-CV-00237
Rosenfeld Deposition 5-9-2019

In The Superior Court of the State of California In And For The County Of Los Angeles – Santa Monica
Carole-Taddeo-Bates et al., vs. Ifran Khan et al., Defendants
Case No. BC615636
Rosenfeld Deposition 1-26-2019

In The Superior Court of the State of California In And For The County Of Los Angeles – Santa Monica
The San Gabriel Valley Council of Governments et al. vs El Adobe Apts. Inc. et al., Defendants
Case No. BC646857
Rosenfeld Deposition 10-6-2018; Trial 3-7-19

In United States District Court For The District of Colorado
Bells et al. Plaintiffs vs. The 3M Company et al., Defendants
Case No. 1:16-cv-02531-RBJ
Rosenfeld Deposition 3-15-2018 and 4-3-2018

In The District Court Of Regan County, Texas, 112th Judicial District
Phillip Bales et al., Plaintiff vs. Dow Agrosiences, LLC, et al., Defendants

Cause No. 1923
Rosenfeld Deposition 11-17-2017

In The Superior Court of the State of California In And For The County Of Contra Costa
Simons et al., Plaintiffs vs. Chevron Corporation, et al., Defendants
Cause No. C12-01481
Rosenfeld Deposition 11-20-2017

In The Circuit Court of The Twentieth Judicial Circuit, St Clair County, Illinois
Martha Custer et al., Plaintiff vs. Cerro Flow Products, Inc., Defendants
Case No.: No. 019-L-2295
Rosenfeld Deposition 8-23-2017

In United States District Court For The Southern District of Mississippi
Guy Manuel vs. The BP Exploration et al., Defendants
Case No. 1:19-cv-00315-RHW
Rosenfeld Deposition 4-22-2020

In The Superior Court of the State of California, For The County of Los Angeles
Warrn Gilbert and Penny Gilber, Plaintiff vs. BMW of North America LLC
Case No. LC102019 (c/w BC582154)
Rosenfeld Deposition 8-16-2017, Trail 8-28-2018

In the Northern District Court of Mississippi, Greenville Division
Brenda J. Cooper, et al., Plaintiffs, vs. Meritor Inc., et al., Defendants
Case No. 4:16-cv-52-DMB-JVM
Rosenfeld Deposition July 2017

In The Superior Court of the State of Washington, County of Snohomish
Michael Davis and Julie Davis et al., Plaintiff vs. Cedar Grove Composting Inc., Defendants
Case No. 13-2-03987-5
Rosenfeld Deposition, February 2017
Trial March 2017

In The Superior Court of the State of California, County of Alameda
Charles Spain., Plaintiff vs. Thermo Fisher Scientific, et al., Defendants
Case No. RG14711115
Rosenfeld Deposition September 2015

In The Iowa District Court In And For Poweshiek County
Russell D. Winburn, et al., Plaintiffs vs. Doug Hoksbergen, et al., Defendants
Case No. LALA002187
Rosenfeld Deposition August 2015

In The Circuit Court of Ohio County, West Virginia
Robert Andrews, et al. vs. Antero, et al.
Civil Action No. 14-C-30000
Rosenfeld Deposition June 2015

In The Iowa District Court for Muscatine County
Laurie Freeman et. al. Plaintiffs vs. Grain Processing Corporation, Defendant
Case No. 4980
Rosenfeld Deposition May 2015

In the Circuit Court of the 17th Judicial Circuit, in and For Broward County, Florida
Walter Hinton, et. al. Plaintiff, vs. City of Fort Lauderdale, Florida, a Municipality, Defendant.

Case No. CACE07030358 (26)
Rosenfeld Deposition December 2014

In the United States District Court Western District of Oklahoma
Tommy McCarty, et al., Plaintiffs, vs. Oklahoma City Landfill, LLC d/b/a Southeast Oklahoma City
Landfill, et al. Defendants.
Case No. 5:12-cv-01152-C
Rosenfeld Deposition: July 2014

In the County Court of Dallas County Texas
Lisa Parr et al, *Plaintiff*, vs. Aruba et al, *Defendant*.
Case Number cc-11-01650-E
Rosenfeld Deposition: March and September 2013
Rosenfeld Trial: April 2014

In the County of Kern, Unlimited Jurisdiction
Rose Propagation Services vs. Hepe Enterprises
Case No. S-1500-CV-278190, LHB
Rosenfeld Deposition: May 2014

In the Circuit Court of Baltimore County Maryland
Philip E. Cvach, II et al., *Plaintiffs* vs. Two Farms, Inc. d/b/a Royal Farms, Defendants
Case Number: 03-C-12-012487 OT
Rosenfeld Deposition: September 2013

In the Court of Galveston County, Texas 56th Judicial District
MDL Litigation Regarding Texas City Refinery Ultracracker Emission Event Litigation
Cause No. 10-UC-0001
Rosenfeld Deposition: March 2013
Rosenfeld Trial: September 2013

In the United States District Court of Southern District of Texas Galveston Division
Kyle Cannon, Eugene Donovan, Genaro Ramirez, Carol Sassler, and Harvey Walton, each Individually and
on behalf of those similarly situated, *Plaintiffs*, vs. BP Products North America, Inc., *Defendant*.
Case 3:10-cv-00622
Rosenfeld Deposition: February 2012
Rosenfeld Trial: April 2013

In the United States District court of Southern District of California
United States of America, Plaintiff vs. 2,560 Acres of Land, more or less, located in Imperial County, State
of California; and Donald L. Crawford, et. al.
Civil No. 3:11-cv-02258-IEG-RBB
Rosenfeld Deposition: December 2012, January 2013

In the Court of Common Pleas of Tuscarawas County Ohio
John Michael Abicht, et al., Plaintiffs, vs. Republic Services, Inc., et al., Defendants
Case No. 2008 CT 10 0741 (Cons. w/ 2009 CV 10 0987)
Rosenfeld Deposition October 2012

In the Court of Common Pleas of Tuscarawas County Ohio
John Michael Abicht, et al., *Plaintiffs*, vs. Republic Services, Inc., et al., *Defendants*
Case Number: 2008 CT 10 0741 (Cons. w/ 2009 CV 10 0987)
Rosenfeld Deposition: October 2012

In the United States District Court for the Middle District of Alabama, Northern Division
James K. Benefield, et al., Plaintiffs, vs. International Paper Company, Defendant.

Letter 03

COMMENTER: Vashon Simien, Blum, Collins & Ho LLP

DATE: December 23, 2025

Response 03.1

The commenter notes they are writing on behalf of Golden State Environmental Justice Alliance and requests they be added to the public interest list regarding any subsequent environmental documents, public notices, public hearings, and notices of determination for this project.

The comment has been acknowledged. This request has been completed, and the contacts have been included for all subsequent environmental documents, public notices, public hearings, and notices of determination related to this project. No further response is required.

Response 03.2

The commenter summarized the proposed project.

This comment is acknowledged. No further response is required.

Response 03.3

The commenter states that the Draft EIR is inadequate because the project is not a permitted use under the West Stowell Specific Plan and is not accounted for in the AQMP, RTP/SCS, or General Plan. The commenter requests that the Draft EIR be revised and recirculated with findings of significance.

As discussed in the IS/EIR, the project site is designated Heavy Commercial/Manufacturing under the City of Santa Maria General Plan and zoned PD/CM-AG (Planned Development/Commercial Manufacturing- Agriculture Overlay) within the adopted West Stowell Specific Plan. These designations allow for warehouse, distribution, and related industrial uses which are in agreement with the proposed project uses. As noted in the Draft EIR on page 2-4, the proposed project does not require a General Plan amendment or zoning change. The Project is consistent with the West Stowell Specific Plan's underlying Heavy Commercial/Manufacturing (HCM) General Plan Land Use Designation. The West Stowell Specific Plan Section 3.1.1.d establishes a process whereby the Planning Commission may consider a use which is not specifically listed in the Specific Plan's Commercial Manufacturing/Agriculture Overlay (CM/AG) Zone as a conditional use, by affirmatively making the findings listed in that same section. To approve the project, the Planning Commission, after duly considering all evidence presented at a future regularly scheduled and noticed Public Hearing, will need to affirmatively make the West Stowell Specific Plan Section 3.1.1.d findings, as well as affirmatively make the Conditional Use Permit and Planned Development Permit findings (Sections 12-35.105 and 12-35.203 of the Santa Maria Municipal Code). If the Section 3.1.1.d findings are made by the Commission, the Commission will have determined that the project is compatible with the adjacent agriculturally-related industrial activities, is not more obnoxious or detrimental to the public welfare than the conditional uses listed in Section 3.1.1.d, is similar in scope and scale to those other permitted and conditional uses listed in Section 3.1.1 and shall not threaten the viability of the adjacent agriculturally-related industrial uses. The commenter refers to the provided Attachment on air quality comments. No further response is required.

Response 03.4

The commenter states that the EIR fails to analyze air quality, energy, and greenhouse gas emissions in detail and omits environmental justice considerations. The commenter emphasizes that the census tract ranks high in pollution burden and socioeconomic vulnerability, requiring a cumulative impact analysis.

As stated in Section 1.2, *Purpose and Legal Authority*, of the Draft EIR, “the purpose of the EIR is to serve as an informational document that:

...will inform public agency decision makers and the public generally of the significant environmental effects of a project, identify possible ways to minimize the significant effects, and describe reasonable alternatives to the project.”

Further, Section 1.3, *Scope and Content*, states that “This Draft EIR addresses impacts identified by the Initial Study to be potentially significant. Transportation impacts to VMT under CEQA Guidelines Section 15064.3(b) was found to have a potentially significant impact and has been studied in this EIR. All other resource areas were either determined less than significant or impacts could be reduced to less than significant with the imposition of mitigation measures. These mitigation measures have been identified in Table ES-2 of the Draft EIR. CEQA Guidelines Section 15131(c) as cited by commenter, requires economic, social and housing factors be considered in addressing significant effects identified in the EIR. Here, the only significant impact not mitigated to less than significant are transportation impacts to VMT. The factors outlined in CEQA Guidelines Section 15131(c) are key components of VMT analysis which, as stated by the Legislature in SB 743 (Steinberg, 2013), provide a mechanism for “evaluating transportation impacts that are better able to promote the state’s goals of reducing greenhouse gas emissions and traffic-related air pollution, promoting the development of a multimodal transportation system, and providing clean, efficient access to destinations.”

Therefore, as Air Quality, Energy and Greenhouse Gases were determined in the IS/EIR (Appendix A) to be less than significant or less than significant with mitigation, and all mitigation measures from the IS/EIR (Appendix A) for these resource areas were incorporated into the Draft EIR, the Draft EIR does not need re-analyze these resource areas.

In addition, the Air Quality Technical Study (IS/EIR Attachment 2), states that because Santa Barbara County is in nonattainment for State ozone and PM₁₀ standards, that cumulative development in the County could violate air quality standards or contribute to a projected air quality violation if the project does not meet significance criteria provided in their guidance documents. As indicated in the IS, the proposed project results in less than significant or less than significant with mitigation findings for all impact areas, therefore meeting the SBCAPD’s significance criteria and therefore not resulting in significant cumulative impacts. Therefore, the proposed project’s contribution to cumulative air quality impacts related to particulate matter and ozone would not be cumulatively considerable. As identified in the IS, the proposed project would not result in a significant impact related to carbon monoxide hotspots, TACs, or odors. Because the proposed project would not exceed thresholds, it would not expose sensitive receptors to a cumulatively considerable amount of substantial pollutant concentrations from carbon monoxide hotspots or TACs or emit a cumulatively considerable quantity of other emissions, such as those leading to odors. Therefore, the project’s contribution to cumulative air quality impacts related to these pollutants would not be cumulatively considerable.

The project was reviewed for consistency with the Santa Maria General Plan, including recently adopted EJ-related policies, and no conflicts were identified. The proposed project does not involve a change to the General Plan land use designation, nor does it require an amendment to the West Stowell Specific Plan. Environmental justice is not an issue listed in CEQA Appendix G for analysis or otherwise required in the CEQA regulations; therefore, this topic is not assessed. With respect to CEQA, environmental justice policy considerations are addressed through the evaluation of physical environmental impacts. The IS/EIR (Appendix A) evaluated potential impacts to air quality, transportation, noise, hazards, and public health, including effects on sensitive receptors, and determined that impacts would be less than significant or less than significant with mitigation. No further response is required.

Response 03.5

The commenter states that the project would emit approximately 10,028 MT CO₂e/year, exceeding the widely used threshold of 10,000 MT CO₂e/year. The commenter states that the EIR does not apply a numeric threshold or propose adequate mitigation measures.

The 10,000 MT CO₂e/year threshold identified by the commentor is for stationary source projects such as an industrial facility and is not intended for use by land use development projects/plans (residential/commercial development). Warehouses, while included as an “industrial” land use type for CEQA and planning purposes at the local level, is a land use-development project that falls under a commercial category at the SBCAPCD level. Industrial facilities at the SBCAPCD level are facilities such as electrical generation facilities. Therefore, the 10,000 MT CO₂e/year threshold is not applicable to the proposed project which is a land use development project at the Air District level. Further support of the used methodology is detailed in response to comment A2 above. The proposed project analysis incorporates the most appropriate methodology and significance thresholds available at this time. No further response is required.

Response 03.6

The commenter states that the EIR relies on CalEEMod modeling, which the commenter alleges is not compliant with Title 24 standards, resulting in underreported energy impacts. The commenter requests that energy modeling be revised using approved compliance software.

CEQA does not require the use of specific models to determine impacts but requires that modeling provide substantial evidence to support its use. For air quality, greenhouse gas, and energy-related evaluations, CalEEMod is the standard, statewide-accepted, modeling tool used for CEQA analysis throughout California, as it is specifically designed to evaluate project-level emissions and energy use at a planning-level. The three programs identified in the comment are meant for finalizing project energy budgets when the specifics of all aspects of development are known. Typically, during the CEQA stage of analysis, the exact type of materials, appliances, windows, insulation, etc. is unknown. This prevents the use of these compliance models as these models require a level of detail that is not yet available.

As stated in the CalEEMod User Guide; “CalEEMod generates default electricity and natural gas consumption based on the Electricity Demand Forecast Zone input in the Project Detail screen and the land use subtypes and building sq ft input in the Land Use module. From these inputs, the default electricity and natural gas consumption is then provided to the user based on 2019 consumption estimates from the California Energy Commission’s (CEC) (2020, 2021) 2018–2030 Uncalibrated Commercial Sector Forecast (Commercial Forecast) and the RASS.”¹

Additionally, the CalEEMod User Guide states; “CEC’s Commercial Forecast and RASS also disaggregate energy consumption end use categories by those that are subject to Title 24 standards and those that are not. CalEEMod provides default building electricity and natural gas use disaggregated into these two categories. The distinction is required to enable accurate calculation of several energy sector emission reduction measures.”²

CalEEMod uses CEC’s own information to determine energy consumption. This information is updated periodically in CalEEMod. The use of the CEC’s information (the agency that stipulated what programs could be used to demonstrate compliance) for projects where it would be premature to have the greater level of detail needed to use the afore-mentioned project, is a valid proxy for project Energy Consumption. The use of CalEEMod adequately provides the potential impacts of the project based on the available level of project detail at the time of the analysis and is supported by substantial evidence. No further response is required.

¹ CAPCOA 2022. CalEEMod California Emissions Estimator Model User Guide. Version 2022.1, Appendix C. April. https://www.caleemod.com/documents/user-guide/04_Appendix%20C.pdf. Accessed January 2026.

² CAPCOA 2022. CalEEMod California Emissions Estimator Model User Guide. Version 2022.1, Appendix D. April. https://www.caleemod.com/documents/user-guide/05_Appendix%20D.pdf

Response 03.7

The commenter states that the project conflicts with many of these items, including but not limited to the following from the General Plan:

- **Goal L.U.5 Development Continuity.** Discourage sprawl and "leap-frog" development.
- **Goal L.U.5 Implementation Program 1.** Encourage industrial development in areas with appropriate urban services and characteristics; such services and characteristics are truck route access, railroad facilities access, relatively level terrain, available utilities, and adjacent high-intensity commercial area. Plan for residential land uses, which do not encroach on industrial districts.
- **Goal L.U.6a Balance Growth.** Accommodate new development, balancing social, environmental, and economic considerations.
- **Goal L.U.6b Preserve Agricultural Resources.** Accommodate growth while making every effort to preserve agricultural resources in the surrounding region.
- **Goal L.U.6c Urban/Agriculture Equilibrium.** Achieve a balance between increased development and the maintenance, management, and/or preservation of local resources.
 - **Objective L.U.6d.** Encourage agricultural activities within the planning area to remain in operation by discouraging land uses that conflict with adjacent farming activities.
- **Goal L.U.6 Implementation Program 6.** Wherever possible, new urban land uses should not be permitted on prime agricultural land. The exception to this policy would be in cases where the new development constitutes infilling between existing development nodes where agricultural activity is no longer desirable because of the surrounding of urban uses.
- **Goal L.U.11 Balance Land Use Supplies.** The City will address the present imbalance between the land area designated for residential development and for those areas designated for industrial and commercial development.
 - **Policy L.U.11 Jobs and Housing.** Assure that a balance of land use between the employment-generating commercial and industrial uses, and residential development is achieved.
 - **Objective L.U.11a.** Maintain the current program of using existing land use and zoning maps to determine whether residential development is appropriate for those areas designated as industrial.
 - **Objective L.U.11b.** On an ongoing basis, determine if the redesignation of some industrial areas to nonindustrial uses is necessary, consistent with goals and policies of L.U.7 and good planning practice.

The commenter notes that the project's VMT per employee exceeds the City's threshold by 237 percent, indicating incompatibility with existing development patterns.

As discussed on page 3-2 of the Draft EIR, the project site is designated Heavy Commercial / Manufacturing (HCM) under the City of Santa Maria General Plan and zoned PD/CM-AG (Planned Development / Commercial Manufacturing – Agriculture Overlay) within the adopted West Stowell Specific Plan. These designations allow for warehouse, distribution, and related industrial uses. The City has the authority to review projects submitted for development but does not have the authority to require applicants to develop specific properties.

With respect to Goal LU-5, the proposed development would be within an incorporated area, within a designated Specific Plan, served by existing and planned urban infrastructure, and adjacent to existing industrial and commercial uses. The project itself would focus on industrial development in areas with appropriate urban services while avoiding residential encroachment into industrial districts.

Regarding Goals LU-6a, LU-6b, and LU-6c, the project is consistent with the General Plan's long-range planning approach. Potential impacts associated with the loss of agricultural resources were previously evaluated in the environmental review documentation for these long-range plans. Interim use of the

industrially designated properties for row-crop production continues as a transitional use within the West Stowell Specific Plan until development entitlements are issued. As the project site is designated and zoned for urban redevelopment, the proposed project would better conform with the intention of the Stowell Area Specific Plan and the project site's designation and zoning.

Regarding Objective LU-6d and Implementation Program LU-6-6, the project would not introduce land uses that conflict with adjacent farming activities. The project would not include residential or other sensitive receptor uses that would constrain agricultural operations. In addition, project approval would require affirmative findings under the West Stowell Specific Plan that the use is compatible with adjacent agriculturally related industrial activities and does not threaten their viability.

A project need not be in perfect conformity with each and every general plan policy. "It is enough that the proposed project will be compatible with the objectives, policies, general land uses and programs specified in the applicable plan." (*Golden Door Properties, LLC v. County of San Diego* (2020) 50 Cal.App.5th 467, 498–499.) "A project is consistent with the general plan "if, considering all its aspects, it will further the objectives and policies of the general plan and not obstruct their attainment." (*Families Unafraid to Uphold Rural etc. County v. Board of Supervisors* (1998) 62 Cal.App.4th 1332, 1336 (*FUTURE*)); See also *Fix the City, Inc. v. City of Los Angeles* (2024) 100 Cal.App.5th 363). No further response is required.

CEQA requires that VMT impacts be disclosed and mitigated where feasible, but a significant VMT impact does not, by itself, indicate a conflict with land use plans. As explained in the Draft EIR Section 4.1, *Transportation*, the project's VMT per employee exceeds the City's threshold, resulting in a significant and unavoidable CEQA impact. This does not alter the project's land use consistency, which is based on zoning, General Plan designations, and applicable policies. The project site's underlying zoning is Commercial Manufacturing (CM), which serves as the City's base zoning district for urban development and was used in SBCAG and other regional analyses. The CM zoning is consistent with the site's General Plan designation and the West Stowell Specific Plan. The West Stowell Specific Plan designated the property for urban development and addressed the impact of converting agricultural land to an urban use. This was assessed in the IS on pages 14 through 15.

Response 03.8

The commenter states that the Draft EIR uses speculative language and lacks evidence regarding workforce availability and housing impacts. The commenter states that the analysis fails to account for potential regional commute impacts and does not substantiate job generation estimates.

As discussed in the IS/EIR, the analysis of workforce availability, housing, and job generation is based on existing conditions, demographic and employment data for the City of Santa Maria and the surrounding region. As discussed in the IS/EIR (Appendix A), Section 14, *Population and Housing*, the proposed project would not induce substantial population growth because it does not include residential development and the anticipated operational workforce is expected to be drawn primarily from the existing local labor force. This is supported by the City's current employment base and projections included in the regional growth forecasts prepared by SBCAG. No further response is required.

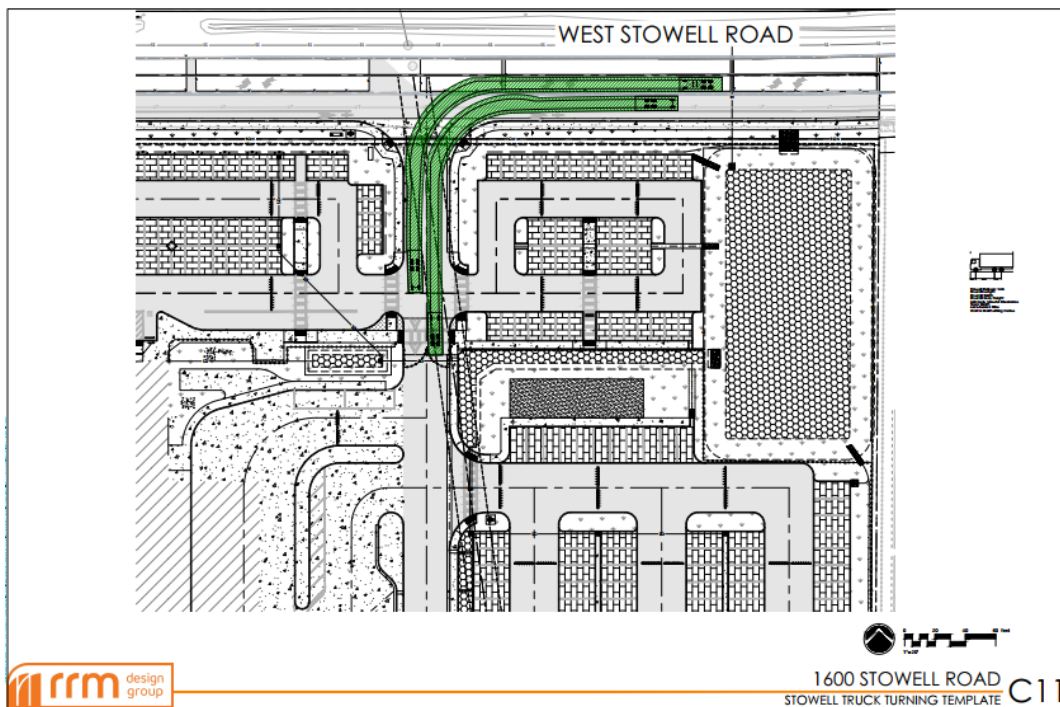
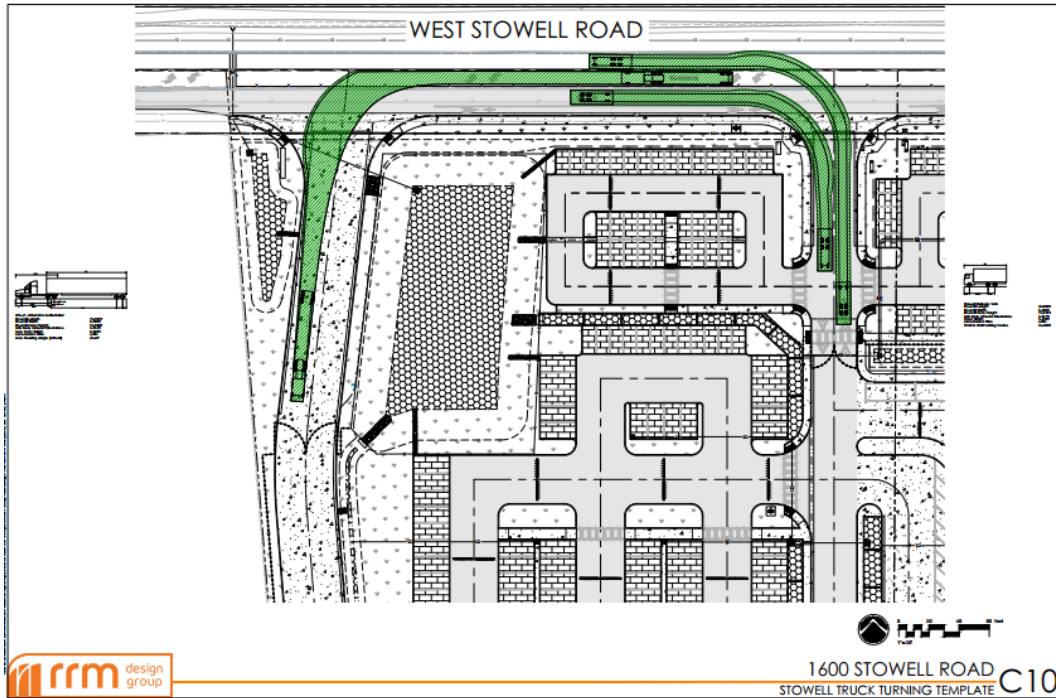
Response 03.9

The commenter states that the Draft EIR does not adequately analyze truck maneuvering, emergency access, or compliance with local codes. The commenter claims that City Fire and Public Works reviews are excluded from public disclosure, violating CEQA's informational requirements.

Truck maneuvering and site access are addressed on page ES-3 of the Draft EIR, including site circulation, driveway design, loading dock configuration, and separation of truck, delivery van, and passenger vehicle movements. Truck access, routing, and on-site circulation were reviewed as part of the project's design and transportation analysis. No deficiencies related to truck maneuvering or operational safety were identified that would result in a significant environmental impact. Emergency access is regulated by California Building Code and California Fire Code requirements. As stated in the Draft EIR, the project

must meet both California Building Code and California Fire Code requirements in order to proceed with construction. As such and as described in the Draft EIR, compliance with California Building Code and California Fire Code requirements would ensure emergency access is provided into and out of the project site.

Turning-movement diagrams for the truck entrance are provided in the TIS (IS Attachment 6), with additional graphics included for reference. The diagrams below show how the project meets semi-trailer truck turning radius and delivery van turning radius requirements.



No City reviews have been omitted from public disclosure. The City of Santa Maria Fire Department and Public Works Department reviews are required for all projects within the City of Santa Maria. Current plan sets have undergone internal City review, including Fire Department and Public Works Department review, to resolve potential deficiencies in the design process, reduce delays during the permitting stage, and ensure the built project would provide adequate protection to its occupants. Fire Department and Public Works Department reviews are an internal City process and approvals are provided in plan sets. Their reviews do not include comments on project features that meet code or other requirements. Comments provided from either department would be required to be incorporated into a revised project design or required through project conditions of approval. Plan sets of the proposed project may become publicly available at a later date. At which time, Fire Department and/or Public Works Department notes would become visible.

Response 03.10

The commenter states that the EIR evaluates only two alternatives, which does not meet CEQA's requirement for a reasonable range. The commenter requests inclusion of alternatives that reduce significant impacts, such as mixed-use development or reduced-scale options.

CEQA requires evaluation of a reasonable range of alternatives capable of feasibly attaining most project objectives while reducing significant impacts but does not state a required number of alternatives to be studied. As described in Chapter 6, *Alternatives*, the Draft EIR evaluated more than two alternatives. In addition to Alternative 1 (No Project Alternative) and Alternative 2 (Reduced-Size Alternative), the Draft EIR also considered other potential alternatives but determined in Section 6.3, *Alternatives Considered but Rejected*, that they did not meet project objectives, were not feasible, or would not meaningfully reduce the project's significant VMT impact. These included alternative locations and a Reduced-VMT alternative, both of which were rejected for the reasons documented in Chapter 6. Furthermore, the EIR did evaluate a reduced-scale option: Alternative 2 (Reduced Size Alternative), which reduces the building footprint by approximately 33 percent. As explained in Section 6.2, Alternative 2 (Reduced-Size Alternative), this alternative was fully analyzed but would not reduce total VMT due to operational requirements therefore would not avoid the significant transportation impact. No further response is required.

Response 03.11

The commenter believes the Draft EIR is flawed and a revised EIR must be prepared for the proposed project and recirculated for public review.

We acknowledge the author's opinion. We continue to stand by the analyses presented in the IS/EIR. The City, after review of comments received on the Draft EIR has concluded that recirculation of the Draft EIR per Section 15088.5 is not warranted. As described in Section 1.2, *Purpose and Legal Authority* of the Draft EIR, recirculation is only required where significant new information is added that shows a new or substantially increased environmental impact or a new feasible mitigation or alternative. None of the comments received provided significant new information requiring recirculation. As stated above in response to comment 03.1, the lead agency acknowledges the commenter's request to add the provided email addresses and mailing address to the project notification list. This request has been completed, and the contacts have been included for all subsequent environmental documents, public notices, public hearings, and notices of determination related to this project. No further response is required.

Response 03.12

The commenter summarized the proposed project and environmental review conducted to date.

This comment is acknowledged and no further response is required.

Response 03.13

The commenter states that the EIR fails to analyze air quality, health risk, and greenhouse gas impacts. The commenter opines that emissions and health risk impacts of the project may be underestimated and a revised EIR should be prepared.

Refer to Responses 03.3 and 03.4 for a discussion of the Draft EIR's analysis of air quality and greenhouse gas emissions. Refer to Response 03.11 for a discussion on the need for a revised EIR. No further response is required.

Response 03.14

The commenter summarizes the CalEEMod outputs provided in Appendix A of the Initial Study. The commenter states that because the construction phase lengths were modified, they must also be justified and as such, the model may underestimate peak daily emissions associated with construction activities.

The Initial Study relies on the Air Quality and Greenhouse Gas Technical Report prepared for the project by NV5 in May 2025 and is attached as Appendix A to the Initial Study. As described in the Air Quality and Greenhouse Gas Technical Report, modifications to the construction phasing were provided by the project applicant and input in CalEEMod where available. CalEEMod default inputs were utilized where site-specific details were not available.

Response 03.15

The commenter states that the project should include the preparation of a health risk assessment (HRA) in order to meet CEQA and California Department of Justice guidelines.

A HRA was not completed for the project because the project would emit low levels of toxic air contaminants and therefore, it did not trigger the Santa Barbara Air Pollution Control District's (SBCAPCD) Assembly Bill 2588 prioritization thresholds that require an HRA; facilities only need to conduct an HRA if they score as high or intermediate priority based on their emissions, which the project does not. Additionally, SBCAPCD relies on screening tools and prioritization calculations, and if the project's emissions fall below these screening levels, no HRA is required. The project, a warehouse use, does not fall into the categories of industry types for which SBCAPCD-prepared or mandatory HRAs are typically required, such as gasoline stations or dry cleaners, further reducing the likelihood of needing an HRA. Finally, the project would not install new toxic-emitting equipment that would trigger the need for the preparation of a HRA. The project would not create substantial toxic air contaminant emissions and as such, an HRA was not required consistent with CEQA best practices. No further response is required.

Response 03.16

The commenter opines that the significance of the project's greenhouse gas emissions should have been evaluated against the most readily available numeric threshold from the South Coast Air Quality Management District.

Refer to Response to comment 03.5 for a discussion of the project's impacts and the suggested use of the threshold of 10,000 MT CO₂e/year. No further response is required.

Response 03.17

The commenter opines that the project would result in significant greenhouse gas emissions impacts and provides a list of potential mitigation measures for the reduction of greenhouse gas emissions impacts. The commenter further states that a revised EIR should be prepared to incorporate potential mitigation measures.

This comment is acknowledged. Based on the Air Quality and Greenhouse Gas Technical Report, the project would not result in greenhouse gas emissions that would create significant impacts on the environment nor would it conflict with applicable plans or regulations intended to reduce greenhouse gas emissions. Implementation of Mitigation Measure AQ-1 would further reduce greenhouse gas emissions of the project by requiring use of line-haul trucks with model years 2014 or newer. As such, a revised EIR would not be required. No further response is required.

Response 03.18

The commenter states that they retain the right to revise or amend their report should additional project information be provided.

This comment is acknowledged. No further response is required.

Response 03.19

The commenter provides the CVs for the SWAPE memo authors.

No further response is required.

Letter O4



Package Delivery Warehouse Planned Development Permit

From Adam Salcido <asalcido@goldenstateeeja.com>

Date Fri 12/26/2025 1:44 PM

To Cody Graybehl <cgraybehl@cityofsantamaria.org>

Cc Executive Director <executivedirector@goldenstateeeja.com>; Assistant Executive Director <assistantexecutivedirector@goldenstateeeja.com>; Steven Piepkorn <spiepkorn@goldenstateeeja.com>; Ramon Amaya <ramaya@goldenstateeeja.com>; Pete Sheehan <psheehan@goldenstateeeja.com>; Stanley Saltzman <ssaltzman@goldenstateeeja.com>

*** EXTERNAL EMAIL: Please use caution when opening links or attachments.***

Good Afternoon Mr. Graybehl,

Please provide any updates to the above mentioned project.

I am requesting under Public Resource Code Section 21092.2 to add the email addresses and mailing address below to the notification list, regarding any subsequent environmental documents, public notices, public hearings, and notices of determination for this project.

executivedirector@goldenstateeeja.com

assistantexecutivedirector@goldenstateeeja.com

asalcido@goldenstateeeja.com

spiepkorn@goldenstateeeja.com

ramaya@goldenstateeeja.com

psheehan@goldenstateeeja.com

ssaltzman@goldenstateeeja.com

Mailing Address:

P.O. Box 79222

Corona, CA 92877

Please confirm receipt of this email.

O4.1

2-115

Thank You,

Adam Salcido

Letter 04

COMMENTER: Adam Salcido, Golden State Environmental Justice Alliance

DATE: December 26, 2025

Response 04.1

The commenter requests any updates on the project and adds the listed email addresses and mailing address to the notification list, regarding any subsequent environmental documents, public notices, public hearings, and notices of determination for this project. The commenter also requests receipt of this letter.

This comment is acknowledged. This request has been completed, and the contacts have been included for all subsequent environmental documents, public notices, public hearings, and notices of determination related to this project. Receipt of email was sent. No further response is required.



TEAMSTERS JOINT COUNCIL 42

INTERNATIONAL BROTHERHOOD OF TEAMSTERS

"To protect and Serve America's Workforce"

December 26, 2025

ATTN: Cody Graybehl, Senior Planner

cgraybehl@cityofsantamaria.org

City of Santa Maria

Planning Division,

Community Development Department

110 South Pine Street, Suite 101

Santa Maria, CA 93454

RE: SCH #2025080640 ("Sowell Road Package Delivery Warehouse")

This letter is submitted on behalf of Local 986 and Joint Council 42 of the International Brotherhood of Teamsters, which together represent over 100,000 workers in the logistics and other industries in Santa Barbara County and the surrounding counties. Teamster members form the backbone of the logistics and package delivery industry in the United States and have direct and practical experience of the operations and impacts of this industry on communities where they work and live, including Santa Maria and the surrounding area. Teamster members have actively engaged with proposed logistics and package delivery facilities not only as workers in this industry but as residents in the working class communities most impacted by this industry.

O5.1

Comments to Sowell Road Parcel Delivery Project Draft EIR 1

As this industry continues to grow, Teamsters feel it is their responsibility to help communities make the most informed possible decisions as well as consider all possible options to address the adverse impacts of the industry. This letter does not waive any rights the locals, joint council, or individual members may have under applicable state law.

Location and Nature of the Project

The project applicant, Seefried Industrial Properties, Inc. (“Applicant”) proposes to build a high-volume 169,104 square foot e-commerce distribution facility (a “high-cube” warehouse) for purposes of last-mile delivery (“the Project”) on a 32-acre parcel in the western portion of Santa Maria, on a site most recently used for growing crops (“the Site”). (Stowell Road Draft Environmental Impact Road (“DEIR”), at page ES-1, PDF page 6). According to the DEIR, the site sits in a “PD/CM-AG” or Planned Development/Commercial Manufacturing - Agricultural Overlay” zone. *Id.*

The Project’s proposed tenant is Amazon, one of the largest retailers in the world and the largest package-delivery retailer in the United States. The Project is being developed for the purpose of expanding Amazon’s existing logistics footprint, to deliver packages containing retail goods purchased through the Amazon website or app to consumers in Santa Maria, Santa Barbara County and throughout the surrounding area. The Project would receive goods via “line haul” trucks (i.e., semi-trucks) from Amazon fulfillment or sortation centers for sortation and delivery to their final destination. The Project is purely a “sortation” node¹ in Amazon’s logistical system, in this context meaning that goods and packages are received and quickly sorted for final delivery to consumers, not a “warehouse” in the sense of a place intended for storage of goods. (NV5 Traffic

O5.1

¹ Not to be confused with a purely sortation facility, which is a facility where packages are sorted for distribution to last mile facilities.

Impact Study (“TIS”) at 16; NV5, Memorandum of Understanding, Scope for Supplemental Traffic Impact Analysis (“STIA”), at 1 of 3).

This type of use is fairly recent; “high-cube” distribution facility type “warehouses” were only added to the Institute of Transportation Engineers Trip Generation Manuals in the last decade, for example.

O5.1

The Project Conflicts with the Specific Plan Because the Specific Plan Did Not Contemplate This Type of Use

In the materials provided by the City as supporting materials or references for the DEIR on its website, only a segment of the 1992-1994 Specific Plan, which controls development of the area, is provided.² (The rest of the specific area plan is available at a different section of the website.)

The Sowell Road Specific Area Plan states that “Future development under this land use designation must be in conformance with the provisions of the CM/AG (Commercial Manufacturing/Agricultural Overlay) zone as established in Section 3.1.1 of this Specific Plan.” (Sowell Road Specific Area Plan (“SRSP”) at 2.1.1). In turn, Section 3.1.1 of the Specific Plan lays out the purpose of the CM/AG zone and the “allowed” or “permitted” uses. Importantly, the section states that the purpose of the zone is to provide for “agricultural and agriculturally related uses”: “The purpose of this zone district is to provide areas for agriculture and agriculturally-related industrial uses. The intent is to provide for these areas with a zone district that is diverse, *yet also restrictive*, in order to ensure compatibility with the protection of neighboring agricultural

O5.2

² See [Stowell Packaging Warehouse Initial Study and Environmental Impact Report Supporting Documents | City of Santa Maria](#) retr’ d December 19, 2025

land uses from any negative impacts such as noise, odor, lighting, traffic, growth inducement or degradation of visual aesthetic values.” (SRSP at 3.1.1(a)). (emphasis added).

The list permitted uses follows from this description of the purpose of the zone. There are fourteen listed categories of uses that are permitted in the zone, with eleven of those nested under “service establishments.” The categories are: 1. Dry and irrigated farming; 2. pasture grazing; 3. service establishments, with eleven listed subcategories: “(a) agricultural packing and processing plant, (b) Blacksmith shop..., (c) Farm implement and machinery sales, service and supply..., (d) Farm implement rental shop, (e) Feed and fuel store, (f) Frozen food locker, (g) irrigation contractor, (h) Oil and water well drilling supplier, (i) Produce distribution warehouse, (j) Wholesale nursery supplies, (k) Wholesale supply storage and distribution center;” and 4. Small animal hospitals.

The DEIR includes a response to comments submitted in response to the Notice of Preparation, as required by law. One commenter raised the issue of conformity (or non-conflict) with the Specific Plan. The DEIR responded that “The proposed project does not conflict with the land use designations or the agricultural-industrial character of the area. The site is located within an area planned for industrial development, and the proposed use is compatible with surrounding land uses.” (DEIR at 1-6). This conclusory statement does not explain how a last-mile e-commerce distribution facility—a use not contemplated or in existence in 1992-94—does not conflict with the list of permitted or even conditional uses listed in the Specific Plan. None of the contemplated permitted uses is any kind of parcel delivery service, or even a pre-e-commerce analog to a package delivery service.

O5.2

The closest feasible analog is a “Wholesale supply storage and distribution center,” which by virtue of the use of the words “storage” and “wholesale” plainly does not refer to a last mile delivery service that expressly disclaims any storage function (see above) and inherently delivers to *retail* consumers. Indeed, this presumption of limited packaging for retail use is built into the analysis of the Initial Study: “The potential for release of hazardous materials is considered to be negligible given that *all materials would be prepackaged in limited quantities for retail consumption and use*, and any release would be small and likely to be easily contained.” (Appendix A, Initial Study at 56) (emphasis added).

There is no catch-all provision in the Specific Plan which allows the City to determine in its discretion whether an unlisted use is permitted or allowed. In fact the language of the Specific Plan expressly limits the room for discretion in determining what is appropriate for the Sowell Road area, because the purpose of the zoning designation is “diverse, yet *restrictive*,” particularly to ensure compatibility with the surrounding agricultural uses.

A city has broad discretion to interpret its own general plan, and in particular to make determinations of consistency. *Anderson First Coalition v. City of Anderson*, 130 Cal. App. 4th 1173, 1192 (2005). However, that discretion is not unlimited. *Families Unafraid v. County of El Dorado*, 62 Cal. App. 4th 1332, 1341 (1998). The determination of consistency must be reasonable—must be based on some kind of objective evidence, or resolving some ambiguity. *See e.g., Orange Citizens for Parks & Recreation v. Superior Court*, 2 Cal. 5th 141, 152, 157 (2016) (lack of ambiguity in the adopted general plan negated trial court’s deference to extrinsic considerations in approving a project’s consistency).

There is no ambiguity here. The SRSP is very clear that the land use designation is intended to provide for *agricultural*-related commercial and industrial uses, meant to complement the surrounding industrial uses. It incorporates a list of permitted and conditionally permitted uses, none of which include any kind of sortation or retail parcel-delivery service, or even a catch-all category that would allow the City to make a consistency determination. The lack of ambiguity and the direct conflict with the language of the Specific Plan means that there is a conflict with the General Plan, via the Specific Plan, and therefore the Draft EIR is legally deficient and any approvals that would flow from the adoption of the DEIR would be void or unlawful.

“The propriety of virtually any local decision affecting land use and development depends upon consistency with the applicable general plan and its elements.” *Orange Citizens for Parks & Recreation v. Superior Court*, 2 Cal. 5th 141, 153, (2016) (internal quotations omitted). The requirement for consistency is what infuses growth planning “with the force of law.” *Id* (quoting *deBottari v. City Council* (1985) 171 Cal.App.3d 1204, 1211). The City in drafting the SRSP with the particular concern that the Sowell Road area preserve its large-scale agricultural character made a very intentional planning decision: not that the area convert over time to general industrial uses, but that it convert over time to agriculturally-related (and compatible) industrial uses. To that end, the City was careful to list the permitted uses, all agriculturally-related, and to emphasize that the land uses could be diverse *but restricted*.

The DEIR’s handling of this conflict is conclusory and insubstantial, in the sense that it states only that there is no conflict, but without any discussion of why. (DEIR at 1-6).

The DEIR’S Vehicle Miles Traveled (VMT) Analysis Requires More Documentation and Potential Mitigations

O5.2

Opacity of the Modeling

The Project is not only incompatible with the Sowell Road Specific Plan, but the use incompatibility is aggravated by the nature of the allegedly “unavoidable” significant environmental impact. The DEIR correctly identifies the VMT excess over the threshold as a significant environmental impact. The per-employee VMT will exceed the acceptable threshold by nearly 240%, adding significantly more vehicles, congestion, and emissions to an area intended to have agriculturally-sensitive uses. Adding hundreds of commercial van trips onto roads that will also be used by slow-moving and over-sized agricultural equipment could very likely result in conflicts for the agricultural uses of precisely the type the Specific Plan was designed to avoid.

The traffic impacts and vehicle miles traveled were generated based on a variety of assumptions, including a modeling of package delivery and estimated commuter times.

The model for employee commute times is based on a figure from the California Emissions Estimator Model (“CalEEMod”) and Santa Barbara County Association of Regional Governments Transportation Demand Model (SBCARGTDM), specifically assuming workers living a “reasonable commuting distance” from the Project. (Appendix D, VMT Analysis at 5). That figure is 6.6 miles per trip, or 13.20 total. It should be noted that the nearest residences to the Project are approximately 2.5 driving miles away, and that based on the median wage at such Amazon facility, and the median household income in Santa Maria, it is unlikely that the Project will be able to draw its entire workforce of approximately 600 from the handful of residential areas within six miles of the Project site in Santa Maria. What’s more, by Amazon’s own admission, an extremely high turnover rate of roughly 150% annually has made it difficult for the company to source its employees locally. In other words, Amazon burns through local labor pools at an extremely high

O5.3

rate, indicating that the Project will need to pull its employees in from further and further away over time.³

Even more problematically, the VMT generation model uses a speculative formula when it could use actual data from existing last mile facilities in the region. The model assumes that “the routes the vans take vary by day and are optimized for the most efficient movement,” but does not disclose the source of this assumption that the routes are “optimized for the most efficient movement.” (Appendix D at 6). In any case, the model presumes to adjust for this by assuming travel to the “furthest point within the delivery zone” and back to the Project. *Id.*

This is not a satisfying analysis for the purposes of CEQA and a DEIR, because these terms are not defined and the source of the information not disclosed. It is not clear from the VMT analysis what the “delivery zone” is or why the Project operator’s internally defined—but not justified—“delivery zone” can underlie a VMT analysis that the public must be able to review, comment on and potentially provide countervailing evidence for. To make the problem more clear, there is nothing in the analysis, the DEIR, or the proposed mitigation measures that would bind the Project operator to the delivery zone used in the analysis. Should the Project operator choose to expand the delivery zone—say for example by closing the other delivery station in the immediate region—the VMT generated could increase significantly.

The VMT analysis naturally cannot perfectly predict the future, but it does not need to. The analysis itself states that currently, some proportion of the existing “delivery zone” is serviced by an existing last mile parcel delivery station. *Id.* at 6. Data from this site, and other Amazon-controlled delivery stations in the region, can and should be used to much more accurately model the likely behavior and generated vehicle miles for the Project.

³ See [Amazon’s workforce turnover is so high that it could run out of people to hire by 2024 | Vox](#)

The Project’s operator, Amazon, has access to this data, naturally, as it maintains records of its deliveries. What’s more, facilities in the region have undergone the DEIR process and therefore the actual VMT generated could be compared directly with the actual VMT generated to determine the accuracy of the model’s assumptions. Given the opacity of the “delivery zone” (and its non-binding nature), a VMT modeling process that includes historical data and behavior of the same Project operator is not only more appropriate but necessary.

O5.3

Alternatively, the DEIR should detail what the delivery zone is—and what constrains the Project operator to that delivery zone in the future, if anything.

Binding Mitigations

The DEIR lists some suggested mitigations but does not seriously investigate potential binding mitigations based on the fact that the VMT impacts so significantly exceed the thresholds that no set of mitigations could feasibly bring the Project into compliance. This is not an adequate reason not pursue all of the mitigations possible, *especially because* the proposed Project so significantly exceeds the thresholds.

Instead, the DEIR takes an a la carte approach, allowing the Project operator to choose from among a list of mitigation measure options, and seemingly change them at will on an annual basis. There are no figures attached to the individual mitigation measures, and no indication given of the degree of mitigation associated with each.

O5.4

This approach to mitigation measures to the discretion of the Project operator at some future date amounts to unlawful deferral of formulation of mitigation measures. This is not compliant with Cal. Code Regs., tit. 14, § 15126.4, subd. (a)(1)(B). CEQA Guidelines require that

“the basis for selecting *a particular measure* should be identified.” *Id.* While the mitigation measures here have been “formulated,” none are associated with a quantum or range of actual mitigations, and none of the mitigations are binding—because the Project’s operator is being allowed to choose from among them, and even change them at its own discretion. The mitigations are therefore not compliant with CEQA.

At least one of items on the proposed menu of mitigation measures seems to be duplicative of a practice allegedly already in place: “Telematics and Routing Optimization: Use software to reduce delivery trip lengths and improve efficiency.” The VMT analysis already assumed maximum efficiency in routing—this was the basis of using a model based on a single trip to the furthest point in the delivery zone: “the routes the vans take vary by day and *are optimized* for the most efficient movement.” (Appendix D at 6) (emphasis added). If it is the case that the routes are *already* optimized for the “most efficient” movement, it cannot be an additional mitigation measure to use software to optimize the routes, because by definition the “most efficient routes” are resulting in VMT that vastly exceeds thresholds.

At the same time, the Project operator (Amazon) does not seem to directly control the drivers—or at least, that is the claim found in the submitted materials. Specifically, the Memorandum of Understanding defining the scope of the updated Traffic Impact Analysis states that “Vans are operated by Delivery Service Providers (DSPs) – *independent companies* contracted exclusively to Amazon.” Either these are “independent companies” or they are so tightly controlled by Amazon that Amazon defines their routes “daily” and can require specific “optimized” routes. This seeming conflict within the DEIR needs to be explained.

Relatedly, the DEIR does not seem to seriously consider the potential of limiting the hours of operation or the delivery zone for the Project. Particularly given that the region is apparently

O5.4

currently served by another last mile delivery facility, limitation of the delivery zone should be considered and if it is not feasible, the reason why it is not feasible should be disclosed to the public and to decision-makers.

O5.4

Conclusion

Given the conflict with the Specific Plan, without transparency as to the source (and justification) of assumptions underlying the VMT analysis, and absent actually binding, specific mitigation measures, any statement of overriding considerations would be inappropriate. The City should reject the Project because it conflicts with the Specific Plan—or the Specific Plan needs to be appropriately amended with a new environmental review. Even after that, the City needs to revisit the EIR process for this particular Project with appropriate metrics and evidence and compel binding mitigation measures.

O5.5

Thank you for your consideration. Please keep us informed as to the progress of this proposed Project.

Sincerely,



Victor Mineros

President

Teamsters Joint Council 42

Letter 05

COMMENTER: Victor Mineros, President, Teamsters Joint Council 42

DATE: December 26, 2025

Response 05.1

The commenter notes they are writing on behalf of Local 986 and Joint Council 42 of the International Brotherhood of Teamsters; and describes the proposed project.

This comment is acknowledged; no response is required as the comment does not raise an environmental issue.

Response 05.2

The commenter states that the project conflicts with the Stowell Road Specific Area Plan, which only permits agricultural and agriculturally related industrial uses. The commenter states that approving the project would violate CEQA's requirement for consistency with the General Plan.

As described in the Draft EIR, the project site is located within the West Stowell Specific Plan and is designated Heavy Commercial/Manufacturing under the City of Santa Maria General Plan, with zoning PD/CM-AG (Planned Development / Commercial Manufacturing -Agriculture Overlay). These adopted designations allow a range of industrial and commercial manufacturing processing uses. Interim use of the industrially designated properties for row-crop production continues as a transitional use within the West Stowell Specific Plan until development entitlements are issued. As the project site is designated and zoned for urban redevelopment, the proposed project would better conform with the intention of the West Stowell Specific Plan and the project site's designation and zoning. As discussed on page 2-4 of the Draft EIR, the project does not require a General Plan amendment or zoning change. The West Stowell Specific Plan Section 3.1.1.d establishes a process whereby the Planning Commission may consider a use which is not specifically listed in the Specific Plan's Commercial Manufacturing/Agriculture Overlay (CM/AG) Zone as a conditional use, by affirmatively making the findings listed in that same section. To approve the project, the Planning Commission, after duly considering all evidence presented at a future regularly scheduled and noticed Public Hearing, will need to affirmatively make the West Stowell Specific Plan Section 3.1.1.d findings, as well as affirmatively make the Conditional Use Permit and Planned Development Permit findings (Sections 12-35.105 and 12-35.203 of the Santa Maria Municipal Code). If the Section 3.1.1.d findings are made by the Commission, the Commission will have determined that the project is compatible with the adjacent agriculturally-related industrial activities, is not more obnoxious or detrimental to the public welfare than the conditional uses listed in Section 3.1.1.d, is similar in scope and scale to those other permitted and conditional uses listed in Section 3.1.1, and shall not threaten the viability of the adjacent agriculturally-related industrial uses. No further response is required.

Response 05.3

The commenter states the VMT modeling assumptions appear opaque and speculative, including unrealistic commute distances and undefined delivery zones. The commenter recommends using actual data from existing delivery facilities to improve transparency and accuracy. The commenter states that the undefined and non-binding delivery zone could lead to future increases in VMT if operations expand.

As described in the VMT Study (IS/EIR Appendix D), the project used standard methods to estimate employee commute VMT, relying on CalEEMod and Santa Barbara County Association of Governments (SBCAG) regional data. Because the future home locations of employees are unknown, the analysis relies on regional averages, an approach that is typical and accepted for VMT assessments throughout California. The delivery zone modeling similarly follows established practices used for similar facilities statewide. Although another delivery center currently serves part of the region, it is located farther away, and using VMT from that facility would not accurately predict VMT for the new facility due operational

differences. The VMT study therefore models VMT based on the proposed facility's own anticipated service area. While delivery zones can shift in the future, the analysis evaluates the maximum VMT reasonably expected if the project operates at full capacity. It is more likely that delivery zones would contract as more facilities are added, not expand. Accordingly, the VMT analysis reflects an appropriate methodology and the resulting significant and unavoidable VMT impact is accurately disclosed in the Draft EIR in Section 4.1 *Transportation*. No further response is required.

Response 05.4

The commenter notes that some proposed measures (e.g., route optimization) duplicate assumptions already used in the VMT analysis. The commenter suggests considering additional measures such as limiting the delivery zone or hours of operation.

Project related VMT comes exclusively from delivery routes rather than employee commuting, therefore only modest reductions are achievable through commuter-focused measures. Carpool and vanpool programs are the practical options currently available for reducing single-occupancy vehicle use as the van trips are an essential part of project operation. Even with full implementation, carpool and vanpool programs would reduce per-employee VMT by less than 0.50 miles per day, resulting in a minimal change to total VMT. Nevertheless, this measure is included in the Draft EIR as CEQA requires including feasible mitigation even when they are identified as significant and unavoidable. No further response is required.

Response 05.5

The commenter states that the City should reject the project due to its conflict with the Specific Plan, the VMT analysis due to its lack of transparency as to the source of the assumptions used in the study, and having mitigation measures that are not binding or specific.

Refer to Response to comment 05.2 for a discussion of conflicts with the Specific Plan. Regarding VMT mitigation, see Response to comment 05.4.

Per the West Stowell Specific Plan Section 3.1.1.d the Planning Commission may consider a use which is not specifically listed in the Specific Plan's Commercial Manufacturing/Agriculture Overlay (CM/AG) Zone as a conditional use, by affirmatively making the findings listed in that same section, as assessed in the IS/EIR on page 64 under Land Use and Planning. As stated in the IS:

"According to the City of Santa Maria West Stowell Specific Plan, the Heavy Commercial Manufacturing (HCM) Land Use designation of the Specific Plan permits activities which manufacture and retail on the same site, as well as other heavy commercial uses which may be land extensive or require transport of materials by heavy truck." [...] "West Stowell Specific Plan similar uses are permitted subject to obtaining a conditional use permit according to the procedures set forth in Chapter 35 of the Santa Maria Zoning Ordinance. A use may be found to be similar if the Planning Commission finds that the project: (i) falls within the intent and purpose of the Commercial/Manufacturing/Agricultural Overlay Zoning District (PD/CM-AG); (ii) will not be obnoxious or detrimental to the public welfare; and (iii) is compatible with adjoining land uses."

No further response is required.

Letter O6



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Oakland, CA 94612

www.lozeaudrury.com
richard@lozeaudrury.com

VIA EMAIL

January 06, 2026

Chenin Dow, Director
Community Development Department
City of Santa Maria
110 S. Pine Street
Santa Maria, CA 93458
cdow@cityofsantamaria.org

Patti Rodriguez, City Clerk
City Clerk-Records Division
City of Santa Maria
110 E. Cook Street
Santa Maria, CA 93454
cityclerk@cityofsantamaria.org

Re: CEQA and Land Use Notice Request for the Package Delivery Warehouse Project (PD2024-0003)

Dear Ms. Dow and Ms. Rodriguez,

I am writing on behalf of Supporters Alliance for Environmental Responsibility (“SAFER”) regarding the project known as the Package Delivery Warehouse Project (PD2024-0003), including all actions referring or related to the proposed development of a 128,480 square-foot delivery warehouse located at the 1600 block of West Stowell Road in Santa Maria (“Project”).

We hereby request that the City of Santa Maria (“City”) send by electronic mail, if possible, or U.S. Mail to our firm at the address below notice of any and all actions or hearings related to activities undertaken, authorized, approved, permitted, licensed, or certified by the City and any of its subdivisions, and/or supported, in whole or in part, through contracts, grants, subsidies, loans or other forms of assistance from the City, including, but not limited to the following:

- Notice of any public hearing in connection with the Project as required by California Planning and Zoning Law pursuant to Government Code Section 65091.
- Any and all notices prepared for the Project pursuant to the California Environmental Quality Act (“CEQA”), including, but not limited to:
 - Notices of any public hearing held pursuant to CEQA.
 - Notice of any Final EIR prepared pursuant to CEQA.
 - Notice of determination, prepared pursuant to Public Resources Code Section 21108 or Section 21152.

Please note that we are requesting notices of CEQA actions and notices of any public hearings to be held under any provision of Title 7 of the California Government Code governing California Planning and Zoning Law. **This request is filed pursuant to Public Resources Code Sections 21092.2 and 21167(f), and Government Code Section 65092**, which requires agencies to mail such notices to any person who has filed a written request for them with the clerk of the agency’s governing body.

Please send notice by electronic mail, if possible, or U.S. Mail to:

O6.1

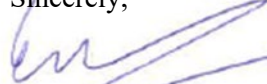
January 06, 2026
CEQA and Land Use Notice Request for the Package Delivery Warehouse Project
(PD2024-0003)
Page 2 of 2

Richard Drury
Chase Preciado
Emy Lipkind
Leslie Reider
Lozeau Drury LLP
1939 Harrison Street, Suite 150
Oakland, CA 94612
richard@lozeaudrury.com
chase@lozeaudrury.com
madeline@lozeaudrury.com
leslie@lozeaudrury.com

06.1

Please call if you have any questions. Thank you for your attention to this matter.

Sincerely,



Emy Lipkind
Lozeau | Drury LLP

Letter 06

COMMENTER: Emy Lipkind, Lozeau Drury LLP

DATE: January 6, 2026

Response 06.1

The commenter notes they are writing on behalf of Supporters Alliance for Environmental Responsibility (SAFER) and requests to receive all CEQA and land use notices related to the project. The commenter requests that the City provide via email a notice of any and all actions, hearings, and decisions associated with the project.

This comment is acknowledged. The City has added the commenter's contact information to the project notification list and would provide future notices via email in accordance with CEQA and City procedures. No further response is required.

Letter 07



SOMACH SIMMONS & DUNN

A PROFESSIONAL CORPORATION
ATTORNEYS AT LAW

500 CAPITOL MALL, SUITE 1000, SACRAMENTO, CA 95814
OFFICE: 916-446-7979 FAX: 916-446-8199
SOMACHLAW.COM

January 15, 2026

Via Electronic Mail Only

City of Santa Maria
Community Development Department
110 S. Pine Street, Suite 101
Santa Maria, CA 93458

Attn: Cody Graybehl, Senior Planner (cgraybehl@cityofsantamaria.org)

Re: Comments on November 2025 Stowell Road Package Delivery Warehouse
Draft EIR (SCH #2025080640)

Dear Mr. Graybehl:

On behalf of the Grower-Shipper Association of Santa Barbara and San Luis Obispo Counties (Grower-Shipper), we submit comments to the City of Santa Maria (City) Community Development Department on the November 2025 Stowell Road Package Delivery Warehouse (Project) Draft Environmental Impact Report (EIR) (SCH #2025080640). Grower-Shipper represents 150 growers, shippers, farm labor contractors, and supporting agribusinesses on matters related to agriculture within Santa Barbara and San Luis Obispo Counties, including within and around the City. Grower-Shipper members grow important crops that are consumed locally and statewide, such as broccoli, strawberries, lettuce, vegetable transplants, flowers, tree fruit, and wine grapes, including in the immediate Project area. Grower-Shipper’s mission is to maintain a vibrant agricultural industry in the region by assisting members to address challenges and capitalize on strengths and opportunities.

07.1

As explained in more detail below, the Draft EIR violates the California Environmental Quality Act (CEQA) (Pub. Resources Code, § 21000 et seq.) because it fails to provide an accurate project description and fails to adequately analyze impacts to traffic safety, agricultural resources, and land use. Grower-Shipper submitted comments on the Notice of Preparation (NOP) on September 12, 2025, which are attached hereto and incorporated herein. The concerns raised in Grower-Shipper’s NOP comments have not been resolved by the Draft EIR.

07.2

A. The Draft EIR’s Project Description Is Inaccurate

“[A]n accurate, stable and finite project description is the sine qua non of an informative and legally sufficient EIR.” (*Stoepthemillenniumhollywood.com v. City of Los Angeles* (2019) 39 Cal.App.5th 1, 17-18, citing *County of Inyo v. City of Los Angeles* (1977) 71 Cal.App.3d 185, 139 (*Inyo*), internal quotations omitted; see also *City of Santee v. County of San Diego* (1989) 214 Cal.App.3d 1438, 1454 [“only through an accurate view of the project may the public and interested parties and public agencies balance the proposed project’s benefits against its environmental cost, consider appropriate mitigation measures, assess the advantages of terminating the proposal and properly weigh other alternatives”].) When a project description obscures or misrepresents a fundamental aspect of the project, an EIR fails as an informational document. (See, e.g., *Communities for a Better Environment v. City of Richmond* (2010) 184 Cal.App.4th 70, 88-89.)

Here, the Draft EIR’s project description is inaccurate—it does not reflect the project that the City purports to approve and allow to be constructed and operated. The Project as described in the Draft EIR includes two eastbound lanes on West (W.) Stowell Road with no left turn lane into the proposed facility. (See Draft EIR, p. ES-3; *id.*, appen. A, attach. 1, sheet C-2 [Frontage Improvements].) However, as Grower-Shipper discovered through communications with City Staff on December 11 and December 16, 2025, the City intends to modify the Project’s design through project conditions of approval to include only one eastbound lane and one two-way turn lane. Roadway modifications and ingress/egress are fundamental aspects of the Project. Up to “990 passenger cars and vans” could be onsite and traveling to and from the Project site along with “[a]pproximately 34 line-haul trucks (semi-trailer trucks)” that “would be expected to deliver packages to the warehouse each day.” (*Id.*, pp. ES-2, 2-12.) The Draft EIR estimates that the Project will result in 2,128 daily traffic trips (1,176 employee trips, 690 delivery van trips, 194 private carrier trips, and 68 line-haul truck trips). (*Id.*, appen. C, p. 16.) This is an incredible volume of vehicles that will travel to and from and enter and exit the site each day. It is imperative that the EIR accurately describe the roadway modifications and site ingress/egress to properly inform the analysis.

For example, the Draft EIR claims that the Project would improve safety (Draft EIR, pp. 4.1-8 – 4.1-9); however, with only one eastbound lane and one two-way turn lane, Grower-Shipper contends, based on its members’ familiarity with this road and the movement of agricultural goods and workers in this area, that the Project will decrease roadway safety and accordingly decrease the safe and efficient movement of agricultural goods, workers, and equipment, through traffic delays and other unsafe roadway conditions, as discussed more below.

The Draft EIR’s project description is also incomplete—it omits integral technical characteristics about roadway design. (Cal. Code Regs, tit. 14, div. 6, ch. 3 [CEQA Guidelines], § 15124, subd. (c).) Information about crucial modifications to W. Stowell Road is buried in Appendix A. Roadway design and ingress/egress are not collateral information or

07.3

highly technical data that need not appear in the body of an EIR (see *id.*, § 15147)—they are central to several significant environmental impacts, discussed below.

Decision-makers and the public cannot be sufficiently informed “of the significant environmental effect[s] of a project,” as CEQA requires, if the Project is inaccurately and inadequately described in a manner that obscures and minimizes impacts, as occurs here. (CEQA Guidelines, § 15121, subd. (a).) An informational failure like this does not let “affected outsiders and public decision-makers balance the proposal’s benefit against its environmental cost, consider mitigation measures, assess the advantage of terminating the proposal ... and weigh other alternatives in the balance.” (*Inyo, supra*, 71 Cal.App.3d at pp. 192-193.) “The degree of specificity required in an EIR will correspond to the degree of specificity involved in the underlying activity which is described in the EIR ... [a]n EIR on a construction project will necessarily be more detailed in the specific effects of the project ... because the effects of the construction can be predicted with greater accuracy.” (CEQA Guidelines, § 15147.) To comply with CEQA, the City must revise the Draft EIR to include an accurate and complete description of the Project’s roadway design and revise analysis or perform additional analysis to ensure the EIR is sufficiently informational.

07.3

B. The Draft EIR Fails to Analyze Traffic Safety Impacts

As explained above, the version of the Project reportedly being considered by the City, with only one eastbound lane and one two-way turn lane, will decrease roadway safety. Grower-Shipper’s NOP comments noted that congestion, as well as turns into the Project facility, could create backups and safety issues for users, especially during periods of high traffic volume. Agricultural vehicles and equipment that frequent the area have differing speed and dimensions than the vehicles that will frequent the Project. Careful consideration and mitigation of line of sight, turns, needed turning radiuses, and the curve in W. Stowell Road near the Project site, which reduces line of sight and can influence the effective speed of traffic, is necessary here. Grower-Shipper has consistently advocated for a variety of options for east-west movement through the City and region to sufficiently and safely accommodate agricultural related traffic, and this Project reinforces the need for various options to address these demands. As it pertains specifically to this Project, to reduce significant impacts to safety, Grower-Shipper requested to the City, in a September 25, 2025, email, attached hereto and incorporated herein, inclusion of the following mitigation measures in the EIR:

07.4

- Widen Stowell Road between Blosser Road and Black Road to four vehicle lanes (two lanes in each direction);
- Include bike lanes on Stowell Road on both sides of the roadway, in addition to the four total vehicle lanes;
- Include a dedicated left turn lane into the Project facility (heading westbound from the City); and

- Include a traffic control light/signal at the intersection of Stowell Road and Black Road.

Grower-Shipper again requests that these mitigation measures be included in the EIR.

Performing a vehicle-miles-traveled (VMT) analysis for traffic impacts “does not relieve [the City] of the requirement to analyze a project’s potentially significant transportation impacts related to ... safety, or any other impact associated with transportation.” (Pub. Resources Code, § 21099, subd. (b)(3).) “Appendix G to the CEQA Guidelines recommends that, in determining whether a project will have significant traffic impacts, lead agencies consider whether it will ‘[s]ubstantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?’ ([CEQA] Guidelines, appen. G, § XV, subd. (d).)” (*Keep Our Mountains Quiet v. County of Santa Clara* (2015) 236 Cal.App.4th 714, 735.) A project that could “doubl[e] the traffic volume,” as would occur here during certain times of the day, “may have a significant impact on traffic safety.” (*Id.*, at p. 736.) As one example, the anticipated time of arrival of the delivery drivers to the Project site is 9:20 a.m., with delivery departures occurring every 20 minutes thereafter. (Draft EIR, p. ES-2.) This would coincide with the morning peak traffic for medium-sized agricultural trucks traversing W. Stowell Road and other regional roadways near the Project, increasing roadway safety issues. This potentially significant impact needs to be analyzed in the EIR.

07.4

Moreover, as explained in Grower-Shipper’s NOP comments, the Traffic Impact Study (TIS) collected traffic counts over one 24-hour period in April. However, regional agricultural employment does not usually peak until June or July. In 2024, total farm employment increased 21% from April to July. This increase in employment results in an increase in agricultural traffic. Additionally, data from the U.S. Department of Agriculture Agricultural Marketing Service, compiled by the California Strawberry Commission showed the weekly volume of strawberries grown in the Santa Maria District increased as much as 60% in the weeks following the date that the Draft EIR traffic count was conducted. W. Stowell Road services several facilities essential to strawberry production, which underscores the inadequacy of the analysis.

To ensure accurate analysis and full disclosure of potential significant safety impacts, traffic counts must be properly timed to correspond with the heaviest annual agricultural traffic. Additionally, as explained in the NOP comment letter, several intersections were omitted from the TIS that should be studied to sufficiently determine traffic safety impacts, including Main Street/State Route (SR) 166 and Hanson Way and Main Street/SR 166 and Blosser Road, as these will be probable routes of Project employee and delivery vehicle travel. Further, Grower-Shipper challenges the TIS analysis of the intersection of W. Stowell Road/Black Road. (Draft EIR, appen. C, Tables 1, 7, 8.) The TIS claims that the intersection operates at an overall level of service (LOS) A and will continue to operate at overall LOS A with the Project (*ibid*); however, Grower-Shipper members who frequent the intersection

07.4

report significant delays exceeding LOS A. The City must do more here to satisfy CEQA’s requirement to analyze potentially significant traffic safety impacts.

C. The Draft EIR Fails to Analyze Impacts on Agricultural Resources

As articulated in Grower-Shipper’s NOP comments, the Initial Study correctly notes that “[t]he City of Santa Maria, located in Santa Barbara County, is characterized by its rich agricultural heritage ... [a]griculture plays a significant role in the local economy” (Draft EIR, appen. A, p. 13.) The Initial Study, however, incorrectly concludes that the Project is compatible with adjoining land uses and would not have any adverse impacts on neighboring agricultural uses. (*Ibid.*) The parcel directly west of the Project site, parcels to the south, and the entire area to the north consists of active agricultural land. The Project’s adverse impact on traffic safety (explained above) without adequate mitigation measures (requested above) will decrease the safe and efficient movement of agricultural goods, workers, and equipment and adversely impact these neighboring agricultural uses, as well as many other regional agricultural operations. Agricultural operations that utilize the roadways impacted by the Project will experience delays in produce reaching neighboring cooling facilities, which can result in significant crop spoilage and reduction of shelf life. This is a concern at all times of the year, and most especially during warmer summer months. Additionally, delays in employees and/or equipment safely and efficiently reaching worksites will also negatively impact agricultural resources in perpetuity. These impacts could ultimately damage agricultural operations such that farmland is made inoperable and converted.

07.5

These reasonably foreseeable impacts can occur during both Project construction and operation and must be considered in the EIR in a dedicated agricultural resources section with feasible mitigation proposed. (See, e.g., CEQA Guidelines, §§ 15126, 15126.2, 15126.4, 15358 [both direct and indirect effects must be analyzed].) For example, mitigation should be proposed that avoids delays from road-disruptive activities related to construction to the maximum extent feasible from the months of April through October, and most especially May through September. Furthermore, mitigation measures to minimize ongoing disruptions to traffic safety and agricultural resources caused by the Project must be incorporated. Because of these impacts to agriculture, the Project contravenes General Plan Policy 5 to “[p]reserve agricultural lands for continued agricultural activities in the Santa Maria Valley” and the Santa Barbara County Right to Farm Ordinance that purports to “protect agricultural land uses ... on land zoned exclusively for agricultural use from conflicts with nonagricultural land uses that may result in financial hardship to agricultural operators or the termination of their operation.” (Santa Barbara County Code, § 3-23, subd. (a).)

D. The Draft EIR Fails to Analyze Land Use Compatibility and Project Consistency with Several General Plan Land Use Goals and Policies

07.6

The Project, as currently contemplated by the City, is incompatible with several General Plan Land Use goals and policies, including:

- Goal L.U.6b, Preserve Agricultural Resources: Accommodate growth while making every effort to preserve agricultural resources in the surrounding region.
- Goal L.U.6c, Urban/Agriculture Equilibrium: Achieve a balance between increased developments and the maintenance, management, and/or preservation of local resources.
- Goal L.U.7, Land Use Conflict Reduction: Reduce existing and potential land use conflicts.
- Policy L.U.7, Site Design: Avoid land use problems before they arise and create maximum harmony through innovative urban design between various land uses.

As explained above, the Project would adversely impact agricultural operations without analyzing those impacts or proposing mitigation in the EIR, and therefore the City is not making every effort to preserve agricultural resources in the surrounding region, nor is it achieving a balance between increased developments and preservation of local resources, reducing potential land use conflicts, or avoiding land use problems before they arise and creating maximum harmony through innovative design. To the contrary, the City has seemingly and silently redesigned the Project while still failing to minimize land use conflicts and failing to achieve balance and harmony.

The Project also conflicts with the W. Stowell Specific Plan, which applies to the Project site. As discussed in Grower-Shipper's NOP comments, the Project would conflict with Specific Plan recommendations, goals, and policies to preserve the area's agricultural character, achieve functional unity with the area's agriculture character, minimize impacts from development, ensure that a majority of existing agricultural uses are maintained in their current state, and, importantly, provide safe and convenient access to agricultural uses.

These plans and policies were adopted at least in part to avoid or mitigate environmental effects, namely agricultural resources, and the Project's conflicts with these plans and policies would result in a significant impact on agriculture, as explained above. These conflicts and this impact must be considered in a dedicated land use section of the EIR with feasible mitigation proposed. (See CEQA Guidelines, appen. G, § XI, subd. (b); *id.*, § 15063, subd. (d)(5); *Pocket Protectors v. City of Sacramento* (2004) 124 Cal.App.4th 903, 930-936.)

Moreover, as explained in the Initial Study, under the W. Stowell Specific Plan the project requires a "conditional use permit" that can only be issued if the Project is found to be "similar enough to the manufacturing uses allowed in the zone" and to have no "adverse impacts on the neighboring agricultural uses." (Draft EIR, appen. A, p. 14.) To be found similar enough to allowable uses, the Project must not be detrimental to the public welfare or incompatible with adjoining land uses. (*Ibid.*) None of these findings can be made, however, because, as explained above, the Project as currently contemplated will adversely affect

07.6

neighboring agricultural uses, be detrimental to public welfare as a result of traffic safety issues and the foreseeable loss of produce from the local food supply, and would be incompatible with adjoining agricultural uses. Thus, without sufficient analysis in the EIR resulting in adequate mitigation, the Project cannot be approved.

07.6

E. Conclusion

Thank you for your consideration of this comment letter. Grower-Shipper's members are very concerned about the Project's impacts on roadway safety and agricultural operations and request adequate analysis and sufficient mitigation measures to control traffic flow and ensure safety on W. Stowell Road, especially between Blosser Road and Black Road, for the mix of existing agricultural traffic and proposed Project traffic that will utilize these roadways. Grower-Shipper is also concerned about the increasing use of Artificial Intelligence (AI) in the preparation of CEQA documents and the inaccuracies that often accompany its use. Accordingly, in addition to the above requests and considerations, Grower-Shipper requests to be informed of which, if any, portions of the EIR were prepared or will be prepared with the assistance of AI.

07.7

We are happy to answer any questions the City may have. Please feel free to contact me at ktaber@somachlaw.com. And, please add me to the list of parties that receive all notices regarding the Project.

Sincerely,



Kelley M. Taber

Attachments

ATTACHMENTS



September 12, 2025

Cody Graybehl
Senior Planner
City of Santa Maria, Planning Division
Community Development Department
cgraybehl@cityofsantamaria.org

Re: Notice of Preparation (NOP) of a Draft Environmental Impact Report (DEIR) for the City of Santa Maria Package Delivery Warehouse Planned Development Permit, Project No. PD2024-0003

Dear Mr. Graybehl,

On behalf of the Grower-Shipper Association of Santa Barbara and San Luis Obispo Counties, we appreciate the opportunity to comment on the referenced project. We represent members who are growers, shippers, Farm Labor Contractors, and interdependent businesses near the immediate project area and beyond. On behalf of our members, we have reviewed the NOP and identified several significant flaws. The Land Use and Planning impacts could be Potentially Significant, as they could conflict significantly with the goals and policies of the West Stowell Specific Plan. We are furthermore concerned that impacts to Agricultural Resources and Transportation could also be Potentially Significant. These impacts could be grossly understated due in large part to an inadequate and fatally flawed Traffic Impact Study.

Land Use and Planning

The project could cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. The Initial Study failed to accurately capture both the conflicts with the West Stowell Specific Plan and negative impacts to the agricultural resources envisioned under the Specific Plan.

Several of the most applicable potential project conflicts with the West Stowell Specific Plan include, but are not limited to the following:

1.1.2. Summary of Specific Plan Recommendations.

Land Use. ...The area currently supports agriculture and related industrial uses. Development under the plan would preserve the area's existing agriculture-industrial character. To this end, the site has been designated for agriculturally-related industrial uses.

Circulation. ...Because proposed land uses are not expected to cause traffic impacts on the existing road network, few additions are proposed by this plan.

1.2 Goals of the Specific Plan:

- 1. It shall be the goal of the West Stowell Specific Plan to achieve a unique, identifiable agricultural and industrial area that provides functional unity with the area's agricultural character.*
- 2. It shall be the goal of the West Stowell Specific Plan to preserve as much agricultural acreage as possible through the implementation of an Agricultural-Industrial Overlay Zone.*

2.1.1 Overall Development Pattern

...It is designed to accommodate future industrial growth, while maintaining agricultural land uses and minimizing impacts to the environment.

Heavy Commercial Manufacturing (HCM). ...It is the intent of the West Stowell Specific Plan to use this designation along with an agricultural overlay as a means of safeguarding and encouraging agriculturally-related industrial activity adjacent to existing agricultural uses.

2.1.2 Land Use Objectives, Policies and Programs

Objective: Provide for a variety of agricultural and agriculturally-related industrial uses, while minimizing environmental impacts resulting from development.

Policy LU 3 -- Assure that a majority of existing agricultural uses are maintained in their current state.

2.2.2 Circulation Objectives, Policies and Programs

Objective: The West Stowell circulation system is to provide safe and convenient access to the agricultural uses and related industrial developments located within the planning area.

3.1.1 Commercial Manufacturing/Agriculture Overlay (CM/AG) Zone Standards and Allowed Uses

...a. Purpose. The purpose of this zone district is to provide areas for agriculture and agriculturally-related industrial uses. The intent is to provide for these areas with a zone district that is diverse, yet also restrictive, in order to ensure compatibility with the protection of neighboring agricultural land uses from any negative impacts such as noise, odor, lighting, traffic, growth inducement or degradation of visual aesthetic values.

Furthermore, although the project lies with the City of Santa Maria's land use planning jurisdiction, the reasonably foreseeable project impacts could also spill into the County land use jurisdiction and conflict with policies that protect orderly land use planning and agricultural resources adopted by both Santa Barbara County and LAFCO.

Agriculture Resources

The project's initial study correctly notes that "The City of Santa Maria, located in Santa Barbara County, is characterized by its rich agricultural heritage and limited forested areas. Agriculture plays a significant role in the local economy..." In this specific and isolated project situation, we do not necessarily oppose the permanent loss of prime agricultural land through conversion to unrelated urban uses. However, the project must adequately identify and mitigate potential negative impacts to agriculture before determining whether the proposed project would be obnoxious or detrimental to the public welfare or would introduce land use conflicts during its construction or operation.

More specifically, we find the project's impacts to traffic to be potentially significant to agricultural resources, both individually and cumulatively, and call for their adequate study and mitigation in the EIR and as project conditions. Our members grow highly perishable crops. Delays in produce reaching neighboring cooling facilities can result in significant crop spoilage and reduction of shelf life. This is a concern at all times of the year, and most especially during warmer summer months. We ask that construction activities and subsequent operations do not result in delays of fresh produce reaching cooling facilities. More specifically, road-disruptive activities related to construction should avoid delays to the maximum extent feasible from the months of April through October, and most especially June through September. Additional concerns are detailed in the following section.

We would like to further discuss with our members the potential impacts, both individually and cumulatively, of the loss of land in the City that was intended to be for agricultural-industrial to unrelated uses, and whether this loss would result in significant impacts to agricultural resources and others.

Transportation

We are very concerned about the project's impacts related to Transportation. The proposed project will result in a significant increase in traffic in the area, and we are particularly concerned about the potential impacts to the safe and efficient movement of agricultural goods, workers, and equipment. We request that the project review correct the following fatal flaws and adequately address the following:

1. **Inadequate Timing of Traffic Study.** Local agricultural operations do not follow traditional office-based hours. We appreciate that the traffic count was performed over a 24 hour period, however it failed to capture seasonal fluctuations in local traffic due to the seasonality of agriculture. The traffic counts were performed on April 18, 2024. California Employment Development Department-Labor Market Information Division-Santa Maria Santa Barbara MSA- Industry Employment & Labor Force - by MONTH¹ showed a 21% increase in Total Farm employment from April 2024 to its peak in July 2024. A properly timed traffic study will likely result in different conclusions on the potential impact of the project and need for adequate mitigation measures.
2. **Inadequate Scope of Traffic Study.** We find it peculiar that Main St-166/Hanson and Main St-166/Blosser Rd were not also studied, as these could be probable routes of employee and delivery vehicle travel. These intersections should also be included in a corrected Traffic Impact Study.
3. **Account for Traffic Impacts on Agricultural Operations.** We are concerned that overall congestion, as well as turns into the facility, could create backups and safety issues for users, especially during periods of high traffic volume. Furthermore, agricultural vehicles and equipment that frequent the area have differing speed and dimensions than the proposed project's vehicles. We encourage careful consideration and mitigation of line of sight, turns, needed turning radiuses, and the curve in Stowell Road near the proposed location, which reduces line of sight and can influence the effective speed of traffic. We have also consistently advocated for a variety of options for east-west movement through the City of Santa Maria and region as a whole, and believe this is another opportunity to reinforce the need for various options to address these demands.
4. **Compatibility of Bicycles.** Finally, the project will "encourage commuting to the project site via bicycles rather than vehicles." We are unclear if the proposed off-site improvements extend beyond the immediate project frontage. It does not appear that the project will include significant widening of Stowell Rd, including westbound travel or turn lanes, or the addition of bike lanes in both directions. We are concerned with the safety and compatibility of bicycle traffic to and through the industrial area, given the heavy vehicles and equipment that will be traveling through the area. If this is true, our members ask for Stowell Rd to be widened and bike lanes added to accommodate this use.

An accurate Traffic Impact Study must be prepared to identify and analyze potentially significant impacts and potentially adequate mitigation measures. These and the other revisions noted above will be essential in determining whether the project can be found to be compatible with the surrounding agricultural uses. It could also be helpful to recirculate the Notice of Preparation with corrected documents so that the public can review the potential impacts. At a minimum, if the EIR does directly proceed, it should include analysis and identification of mitigation measures to address the potentially significant impacts to Agriculture and Forestry Resources and Land Use and Planning, as well as Transportation. We further request to be informed in writing of future notices and opportunities to comment related to the project. Thank you for your consideration of these comments. We believe a comprehensive and detailed analysis of these specific issues is essential to ensuring a thorough and meaningful environmental review and successful project construction and operation if it moves forward at this location.

Sincerely,



Claire Wineman, President

¹ [https://labormarketinfo.edd.ca.gov/file/indhist/satb\\$hws.xls](https://labormarketinfo.edd.ca.gov/file/indhist/satb$hws.xls) August 15, 2025
Grower-Shipper Assoc of SB & SLO Counties

claire.wineman@grower-shipper.com

From: Cody Graybehl <cgraybehl@cityofsantamaria.org>
Sent: Thursday, September 25, 2025 4:36 PM
To: claire.wineman@grower-shipper.com
Cc: Frank Albro Jr.
Subject: RE: Comments on Project No. PD2024-0003 - NOP Stowell Rd Package Delivery Warehouse PDP

Good afternoon Claire,

Received, thank you.

Staff will need some time to review the proposed items below and coordinate with our environmental consultant and the City's Engineering Division before providing any feedback on the concepts.

Sincerely,

Cody Graybehl
Senior Planner
Planning Division
Community Development Department
City of Santa Maria
(805) 925-0951 x 2552
cgraybehl@cityofsantamaria.org
110 S. Pine Street Suite 101
Santa Maria, CA 93458



From: claire.wineman@grower-shipper.com <claire.wineman@grower-shipper.com>
Sent: Thursday, September 25, 2025 9:44 AM
To: Cody Graybehl <cgraybehl@cityofsantamaria.org>
Cc: Frank Albro Jr. <falbro@cityofsantamaria.org>
Subject: RE: Comments on Project No. PD2024-0003 - NOP Stowell Rd Package Delivery Warehouse PDP

*** EXTERNAL EMAIL: Please use caution when opening links or attachments.***

Good morning,

I wanted to follow up on our recently submitted comments. Our Board of Directors recently met and requested inclusion of the following to mitigate reasonably foreseeable traffic and agricultural impacts:

- Widen Stowell Rd between Blosser Rd and Black Rd to 4 vehicle lanes (2 lanes in each direction) and also add a bike lane in each direction (1 bike lane in each direction in addition to the vehicle lanes), and

- Add a left turning lane into the facility (left turn if heading westbound from the City), and
- Add a traffic control light/signal at Stowell Rd and Black Rd

Please let me know if you have any questions on the Board's direction.

Thank you,
Claire

Claire Wineman
President
Grower-Shipper Association
of Santa Barbara and San Luis Obispo Counties
Mailing Address-*NEW*:
PO Box 309
Santa Maria, CA 93456
Physical Address:
534 E Chapel St
Santa Maria, CA 93454
Phone: 805.343.2215
Cell: 805.868.8245
Email: claire.wineman@grower-shipper.com

From: Cody Graybehl <cgraybehl@cityofsantamaria.org>
Sent: Monday, September 15, 2025 7:31 AM
To: Claire Wineman <claire.wineman@grower-shipper.com>
Subject: RE: Comments on Project No. PD2024-0003 - NOP Stowell Rd Package Delivery Warehouse PDP

Good morning Clarie,

Received, thank you.

Sincerely,

Cody Graybehl
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Planning Division
Community Development Department
City of Santa Maria
(805) 925-0951 x 2552
cgraybehl@cityofsantamaria.org
110 S. Pine Street Suite 101
Santa Maria, CA 93458



From: Claire Wineman <claire.wineman@grower-shipper.com>

Sent: Friday, September 12, 2025 4:52 PM

To: Cody Graybehl <cgraybehl@cityofsantamaria.org>

Subject: Comments on Project No. PD2024-0003 - NOP Stowell Rd Package Delivery Warehouse PDP

*** EXTERNAL EMAIL: Please use caution when opening links or attachments.***

Good afternoon,

Please see attached for comments on the referenced project. I would appreciate if you could please confirm receipt and inform us of future public notices and opportunities to comment.

Thank you,
Claire

Claire Wineman
President
Grower-Shipper Association
of Santa Barbara and San Luis Obispo Counties
Mailing Address-*NEW*:
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534 E Chapel St
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Phone: 805.343.2215
Cell: 805.868.8245
Email: claire.wineman@grower-shipper.com

Letter 07

COMMENTER: Kelley M. Taber, Somach Simmons & Dunn

DATE: January 15, 2026

Response 07.1

The commenter notes they are writing on behalf of Grower-Shipper Association of Santa Barbara and San Luis Obispo Counties (Grower-Shipper). The commenter states Grower-Shipper represents about 150 agricultural businesses operating in and around the City of Santa Maria, including growers of key regional crops near the project site, and its mission is to support a robust regional agricultural industry.

This comment is acknowledged. This comment does not pertain to the environmental analysis presented in the Draft EIR, and no further response to this comment is required.

Response 07.2

The commenter believes the Draft EIR violates CEQA (Pub. Resources Code, § 21000 et seq.) because it fails to provide an accurate project description and fails to adequately analyze impacts to traffic safety, agricultural resources, and land use.

These issues are addressed below in the responses to the specific comments raised by the commenter.

Response 07.3

The commenter states that the Draft EIR's project description is inaccurate and misleading, particularly regarding the planned roadway modifications on West Stowell Road. Because the project generates over 2,100 daily trips, including 34–68 line-haul truck trips, accurate roadway design would be essential to evaluate impacts. The commenter states that locating roadway details only in the appendices rather than the main body of the Draft EIR, obscures important information and prevents proper CEQA review.

The projects TIS (IS/EIR Appendix C) fully evaluated the project using standard CEQA and City methodologies. The project description in the Draft EIR accurately reflects the proposed roadway modifications and transportation improvements as analyzed in the TIS. As discussed in the Draft EIR Executive Summary (pages ES-3 and ES-8) and Section 2.4.5, *Parking and Site Access*, the project includes improvements along West Stowell Road, including installation of additional eastbound travel lanes, a bicycle lane, sidewalk improvements, pedestrian barricades, street lighting, and curb and gutter modifications to support safe site access. These improvements are further illustrated on the site circulation and frontage improvement plans and are evaluated in detail in Section 4.1, *Transportation* and the TIS in Appendix C, which analyze site access, truck circulation, and interaction with existing roadway conditions, therefore recirculation is not required. No further response is required.

Response 07.4

The commenter states that the Draft EIR inadequately analyzes traffic safety, including conflicts with agricultural traffic. The commenter states that agricultural vehicles have slower speeds and wider turning radiuses, therefore the commenter states that the proposed roadway configuration (only one eastbound lane) will decrease safety, especially near the road curve limiting visibility. The commenter had previously recommended mitigation measures, including:

- Widening Stowell Road to four lanes
- Adding bike lanes in both directions
- Adding a dedicated left-turn lane into the facility
- Installing a traffic signal at Stowell & Black Road

The commenter states that the Draft EIR's TIS is flawed because traffic counts were taken in April, whereas agricultural traffic peaks in June–July (e.g., strawberry volumes increase up to 60 percent later in the season). The commenter states that the TIS failed to include key intersections (Main St/SR-166 at Hanson and Blosser), likely used by project-related traffic.

As discussed in the Draft EIR Section 4.1, *Transportation* and the TIS (IS/EIR Appendix C), the project's transportation analysis evaluated roadway safety, intersection operations, and potential conflicts with existing traffic patterns on Stowell Road. The analysis included an assessment of vehicle speeds, lane configurations, sight distance, and roadway geometry in accordance with City standards and industry-standard methodology. The TIS concludes that the proposed roadway configuration would continue to operate safely with implementation of project improvements.

Agricultural traffic is generally not considered substantially different from typical traffic because it uses the same public roadways, follows the same traffic laws, and produces similar types of vehicle-related impacts, such as emissions, noise, and roadway wear. While agricultural vehicles may be slower or larger, these characteristics alone do not make them a distinct traffic category in the transportation analysis, which evaluates overall vehicle volumes, trip generation, and roadway performance regardless of a vehicle's purpose. As long as agricultural traffic operates within normal legal and safety parameters and does not introduce unique hazards or significantly different travel patterns, it functions similarly to other vehicles on the network and is therefore treated as part of general traffic rather than a specialized or separate class.

Roadway widening is not necessary as the traffic analysis determined that West Stowell Road has adequate capacity to accommodate projected vehicle volumes without resulting in safety concerns. The proposed project would include signal optimization which would also serve to enhance the overall level of service along Stowell Road, though level of service is not considered a CEQA impact.

As discussed in the Draft EIR Section 4.1, *Transportation* and the TIS (IS/EIR Appendix C), there are no sidewalk or bicycle facilities along West Stowell Road or within a half-mile of the proposed project. As there is no reasonable nexus to provide bicycle facilities and bicycle trips along nearby roadways are minimal, the project would not be required to implement bicycle lanes on West Stowell Road.

Refer to Response O3.9 for a discussion of the incorporated dedicated left turn lane.

The West Stowell Road and Black Road intersection was not identified within the TIS as requiring traffic signal or other improvements to resolve a potential impact from the project. As such, no improvements are proposed to this intersection or needed because of project impacts.

Further the project description with regard to traffic is not flawed, as asserted by the commenter. As stated in the Court in *Gooden v. County of Los Angeles* (2024) 106 Cal.App.5th 1, 17, a project description may be considered accurate and stable without "robbing public agencies of the flexibility needed to tailor projects in response to feedback." *Id.* Instead, the courts look to ensure the public's ability to participate in process and comment meaningfully and whether the ultimately approved project alters the very nature of the project or its approved main features. *Id.* at 18-19. Here, the nature of the project and its approved main features remain consistent, while the lead agency is entitled to flexibility in its implementation. No further response is required.

Response 07.5

The commenter states the Draft EIR overlooks significant impacts on agricultural operations, including:

- Delays to the movement of fresh and highly perishable produce, potentially causing spoilage and economic losses.
- Reduced safety and efficiency for workers, equipment, and transport vehicles.
- Cumulative impacts during both construction and operation.
- Potential conversion of farmland if operations become infeasible due to increased congestion and delays.

The commenter emphasizes that these impacts directly conflict with local agricultural policies and the Santa Barbara County Right-to-Farm Ordinance.

CEQA does not evaluate transportation impacts based on congestion, delay, or LOS. As described in the Draft EIR Section 4.1, *Transportation*, the project does not substantially alter roadway capacity or create new operational constraints that would impede regional agricultural goods movement. Project traffic occurs largely outside peak agricultural haul and school commute periods. No evidence was provided demonstrating that project operations would result in spoilage or economic losses. Accordingly, potential delays attributed to traffic congestion are not a CEQA impact and do not require mitigation.

Refer to Response to comment A3.2 for a discussion on roadway safety.

The Draft EIR evaluated cumulative transportation impacts using a project list consistent with CEQA Guidelines. Even when the project is considered cumulatively with other planned development, the project would not cause a significant increase in VMT affecting agricultural activities or create hazardous roadway conditions affecting agricultural activities. No evidence was provided demonstrating that cumulative construction or operational traffic would render agricultural operations unsafe or infeasible.

As described in the IS/EIR on page 3-2, the project site is located within the West Stowell Specific Plan and is designated Heavy Commercial/Manufacturing under the City of Santa Maria General Plan, with zoning PD/CM-AG (Planned Development / Commercial Manufacturing -Agriculture Overlay). These adopted designations allow a range of industrial and commercial manufacturing processing uses. As noted in the Draft EIR, the proposed project does not require a General Plan amendment or zoning change and is consistent with the land use framework already adopted for this area.

The West Stowell Specific Plan Section 3.1.1.d establishes a process whereby the Planning Commission may consider a use which is not specifically listed in the Specific Plan's Commercial Manufacturing/Agriculture Overlay (CM/AG) Zone as a conditional use, by affirmatively making the findings listed in that same section. To approve the project, the Planning Commission, after duly considering all evidence presented at a future regularly scheduled and noticed Public Hearing, will need to affirmatively make the West Stowell Specific Plan Section 3.1.1.d findings, as well as affirmatively make the Conditional Use Permit and Planned Development Permit findings (Sections 12-35.105 and 12-35.203 of the Santa Maria Municipal Code). If the Section 3.1.1.d findings are made by the Commission, the Commission will have determined that the project is compatible with the adjacent agriculturally-related industrial activities, is not more obnoxious or detrimental to the public welfare than the conditional uses listed in Section 3.1.1.d, is similar in scope and scale to those other permitted and conditional uses listed in Section 3.1.1 and shall not threaten the viability of the adjacent agriculturally-related industrial uses. The Santa Barbara County Right-to-Farm Ordinance is intended to protect agricultural operations from claims resulting from lawful farming activities. The project would not restrict, encroach upon, or impose new operational limitations on surrounding agricultural uses, nor would it introduce residential or other sensitive uses that would increase the potential for land use conflicts. Refer to Response to comment O3.7.

Response O7.6

The commenter states that the project conflicts with multiple General Plan goals, including:

- Preserving agricultural resources (Goal LU-6b)
- Balancing development with agricultural preservation (Goal LU-6c)
- Reducing land-use conflicts (Goal LU-7)

The commenter states that the project also conflicts with the West Stowell Specific Plan, which requires:

- Preservation of agricultural character
- Safe and convenient access to agricultural uses
- Ensuring agricultural land uses remain compatible with new development

The commenter argues that because the Draft EIR fails to analyze or mitigate these conflicts, the City cannot make required findings for issuing a Conditional Use Permit, including compatibility with agricultural uses and protection of public welfare.

Regarding Goal LU-6b, Goal LU-6c, and Goal LU 7, the project was reviewed for consistency with the Santa Maria General Plan and no conflicts were identified. The project does not involve a change to the General Plan land use designation, nor does it require an amendment to the West Stowell Specific Plan. As discussed, the project site is Heavy Commercial/Manufacturing (HCM) and zoned PD/CM-AG, where industrial and manufacturing uses are anticipated. As discussed in the IS/EIR, (Appendix A), the project would not convert additional farmland beyond what was previously contemplated under the West Stowell Specific Plan and would not interfere with existing agricultural activity on surrounding lands.

Regarding claims the proposed project conflicts with the West Stowell Specific Plan, the project would not introduce residential or other sensitive receptors that would constrain agricultural activities. The project was specifically reviewed under zoning and West Stowell Specific Plan provisions. As discussed in the Draft EIR and responses to prior comments, roadway safety, access, and operational characteristics were evaluated and found not to create hazardous conditions or operational conflicts.

Refer to Response to comment O3.7 and O7.5.

Response O7.7

The commenter concludes that the Draft EIR must be revised to address all topics addressed in the comment letter as well as potentially recirculate the NOP or Draft EIR. The commenter requests future notification of all future project actions, disclosure of any AI-assistance in drafting the Draft EIR and continued engagement with the City regarding traffic and agricultural impacts

The City, after review of comments received on the Draft EIR has concluded that recirculation of the Draft EIR per Section 15088.5 is not warranted. As described in Section 1.2, *Purpose and Legal Authority* of the Draft EIR, recirculation is only required where significant new information is added that shows a new or substantially increased environmental impact or a new feasible mitigation or alternative. None of the comments received provided significant new information requiring recirculation. Further, Rincon Consultants did not use AI-assistance in the drafting of this Draft EIR. The City has included the commenter on its list for notification on the project.

Letter O8

January 16, 2026

Advocates for the Environment

Cody Graybehl
Senior Planner
City of Santa Maria
110 South Pine St, Suite 101
Santa Maria, CA 93454

A non-profit public-interest law firm
and environmental advocacy organization



Via U.S. Mail and email to cgraybehl@cityofsantamaria.org

Re: Comments on the Draft Environmental Impact Report for the Stowell Road Package
Delivery Warehouse Project, SCH No. 2025080640

Dear Mr. Graybehl:

Advocates for the Environment submits the comments in this letter regarding the Draft Environmental Impact Report (**DEIR**) for the Stowell Road Package Delivery Warehouse Project (**Project**). The Project Site is located at 1680 West Stowell Road in the City of Santa Maria (**City**) in Santa Barbara County. The Project proposes to develop the 32-acre Project Site by constructing a 169,104 square-foot distribution warehouse. We have reviewed the DEIR prepared in November 2025 and submit comments regarding the sufficiency of the DEIR's Greenhouse-Gas (**GHG**) analysis under the California Environmental Quality Act (**CEQA**).

O8.1

The City should require the Project to be net-zero

Given the current regulatory context and technological advancements, a net-zero significance threshold is feasible and extensively supportable. GHG emissions from buildings, including indirect emissions from offsite generation of electricity, direct emissions produced onsite, and from construction with cement and steel, amounted to 21% of global GHG emissions in 2019. (IPCC Sixth Assessment Report, Climate Change 2022, WGIII, Mitigation of Climate Change, p. 9-4.) This is a considerable portion of global GHG emissions. It is much more affordable to construct new building projects to be net-zero than to obtain the same level of GHG reductions by expensively retrofitting older buildings to comply with climate change regulations. Climate damages will keep increasing until we reach net zero GHG emissions, and there is a California state policy requiring the state to be net-zero by 2045. It therefore is economically unsound to construct new buildings that are not net-zero.

O8.2

Environmental groups have achieved incredible outcomes by litigation under CEQA. Two of the largest mixed-use development projects in the history of California, Newhall Ranch (now FivePoint Valencia), and Centennial (part of Tejon Ranch) decided to move forward as

net-zero communities after losing CEQA lawsuits to environmental groups. The ability for these large projects to become net-zero indicates that it is achievable, even for large-scale developments. The Applicant for this Project should do the same.

We urge the City to adopt net-zero as the GHG significance threshold for this project. This threshold is well-supported by plans for the reduction of GHG emissions in California, and particularly the CARB Climate Change Scoping Plans. The CARB 2017 Scoping Plan states that “achieving no net additional increase in GHG emissions, resulting in no contribution to GHG impacts, is an appropriate overall objective for new development.” (CARB 2017 Scoping Plan, p. 101.) Additionally, the CARB 2022 Scoping Plan reaffirms the necessity of a net zero target by expressing: “it is clear that California must transition away from fossil fuels to zero-emission technologies with all possible speed ... in order to meet our GHG and air quality targets.” (CARB 2022 Scoping Plan, p. 184.) CARB further encourages a net-zero threshold in its strategies for local actions in Appendix D to the 2022 Scoping Plan. (CARB 2022 Scoping Plan, Appendix D p. 24-26.)

Moving this Project forward as a net-zero project would not only be the right thing for the City to do, but also would help protect the City and the Applicant from CEQA GHG litigation.

CEQA GHG Significance Analysis

The DEIR derived its GHG significance thresholds from the CEQA Appendix G Guidelines and concluded that the Project’s GHG emissions would be less than significant, claiming that the Project would not generate GHG emissions that may have a significant effect on the environment and that the Project would be consistent with plans, policies, and regulations for the reduction of GHG emissions. (DEIR Appendix A, p. 31.) The DEIR used CalEEMod to quantify the Project’s annual emissions at 10,038 metric tons carbon dioxide equivalent (MTCO_{2e}) per year. (DEIR Appendix A, p. 41.) The DEIR concluded that the Project’s GHG emissions would be less than cumulatively considerable after mitigation. (DEIR Appendix A, p. 42.) However, this significance conclusion is not supported by substantial evidence.

As the basis for its significance determination under the first significance threshold, the City chose regulatory compliance to show a less-than-significant GHG impact. (DEIR Appendix A, p. 31.) The Project stated the “most applicable and adopted... plans are the 2022 Scoping plan and SBCAG 2050 RTP/SCS.” (DEIR Appendix A, p. 42.)

08.2

08.3

Chosen threshold is not supported by substantial evidence

The City did not provide substantial evidence that complying with the 2022 Scoping plan and SBCAG 2050 RTP/SCS is a valid significance threshold to demonstrate a less-than-significant impact. Moreover, the Project is not consistent with the 2022 Scoping Plan or the SBCAG Connect 2050 RTP/SCS, as well as other applicable plans for the reduction of GHG emissions.

The Project Would be Inconsistent with the 2022 Scoping Plan

The DEIR asserted that the Project would not conflict with the 2022 Scoping Plan. Yet, there are some policies in the 2022 Scoping Plan that the Project would not adhere to. For example, the 2022 Scoping Plan sets a goal for 50% of all industrial energy demand to be electrified by 2045 (2022 CARB Scoping Plan, p. 77).¹ The DEIR makes no showing that the Project is consistent with this goal. The DEIR mentions that the Clean Electricity Grid section aims to transition to 100% renewable and zero-carbon electricity. (DEIR Appendix A, p. 43.) However, the Project does not commit to using 100% renewable and zero-carbon electricity; it instead commits to having a solar-ready roof, which would allow for future installation of a solar photovoltaic (PV) system to generate electricity. (DEIR Appendix A, p. 43.) This is an aspirational measure that does not require the displacement of fossil fuel use or result in enforceable, quantified reductions in greenhouse gas emissions. The 2022 CARB Scoping Plan also places particular emphasis on decarbonizing industrial facilities by “displacing fossil fuel use with a mix of electrification, solar thermal heat, biomethane, low- or zero-carbon hydrogen, and other low-carbon fuels to provide energy for heat and reduce combustion emissions” (2022 CARB Scoping Plan, p. 208). Again, the Project does not appear to be consistent with this goal, based on the analysis provided in the DEIR. The Project creates a conflict with the 2022 Scoping Plan by its reliance on diesel fuel in its operations. (See DEIR Appendix A, p 22) [noting 34 daily line haul roundtrips and diesel gas-powered fire pumps.]

O8.3

The Project Would be Inconsistent with the SBCAG 2050 RTP/SCS

The Project asserts it would be consistent with the SBCAG Connect 2050 RTP/SCS because the Project would be consistent with policy 1.2.1, 1.3.1, 1.3.2, and 2.3.1. (DEIR Appendix A, p. 45.) Yet, these statements are conclusory and insufficiently supported.

Policy 1.2.1 requires projects to lead to reductions in greenhouse gas and criteria pollutant emissions, consistent with regional air quality goals and SB 375 targets for passenger vehicles in 2020 and 2035. (DEIR Appendix A, p. 45.) The DEIR asserts that the Project is consistent with this policy because it would include a solar-ready roof and install Level 2 and Level 3 EV charging stations. (DEIR Appendix A, p. 45.) This finding relies on a mistaken

¹ 2022 Scoping Plan located at: <https://ww2.arb.ca.gov/sites/default/files/2023-04/2022-sp.pdf>

assumption that these optional features will result in GHG reductions. Neither feature guarantees renewable energy generation or ensures reductions in passenger-vehicle emissions, and the DEIR provides no evidence regarding how much of the roof will be solar-ready. The DEIR's conclusion of consistency with Policy 1.2.1 is unsupported.

Likewise, Policy 1.3.2 requires projects to promote renewable energy and energy conservation, consistent with applicable federal, State, and local energy programs, goals, and objectives. (DEIR Appendix A, p. 45.) The DEIR asserts that the Project is consistent with this policy because it would include a solar-ready roof, allowing for future installation of PV systems. (DEIR Appendix A, p. 45.) This finding is unsupported. The DEIR does not identify which federal, State, or local programs or objectives the Project is meeting by including a solar-ready roof. While the DEIR references Title 24, it does not tie this code or its minimum 15 percent solar-ready requirement to the Project. (DEIR Appendix A, p. 38.)

The DEIR Should Have Analyzed All Applicable Plans

The DEIR chose, as its second GHG threshold, whether the Project would “conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases.” (DEIR Appendix A, p. 43.) This language requires that the DEIR analyze the Project's consistency with all other applicable plans, not just the plans that the Project prefers to analyze.

An agency must consider a project's GHG impact over time to reasonably evaluate the full extent of environmental impact as CEQA requires. The City did not estimate or account for the GHG impact across the Project's lifespan. However, the reasonable lifespan of a commercial building averages 50 to 60 years.² Accordingly, the Project must show consistency with long-term State GHG goals to comply with CEQA. In particular, the DEIR must also demonstrate consistency with Executive Order B-55-18 (EO B-55-18).

EO B-55-18 requires the State of California to achieve carbon neutrality, net zero GHG emissions, by 2045. The Project is inconsistent with EO B-55-18 because it does not prohibit the use of gasoline and diesel in its operations. In fact, the Project would use diesel-powered equipment during construction, diesel fire pumps, and emit diesel exhaust from the heavy-duty truck traffic that the Project would create. (DEIR, Appendix A, p. 22.) Burning non-renewable fuels, such as diesel, results in substantial GHG emissions, preventing the Project from ever achieving carbon neutrality, unless it enters into agreements with the applicant and/or future tenant to ensure that fossil fuel use is on track to be eliminated by 2045. Thus, the Project

² <https://bciconstruction.us/which-factors-determine-the-lifespan-of-a-building/#:~:text=Use%20of%20the%20Building,-Finally%2C%20the%20use&text=A%20warehouse%20used%20to%20produce,for%20major%20repairs%20or%20renovations.>

08.3

would conflict with EO B-55-18. As stated by the City's chosen threshold, conflict with *any* applicable policy would be a significant GHG impact.

The 2017 Scoping Plan was developed to help California comply with SB 32, which mandates a 40% reduction in GHG emissions below 1990 levels by 2030 (Health & Safety Code § 38566). The DEIR does not explain how the Project aligns with these objectives or the 2050 goal of reducing emissions by 80% below 1990 levels. Moreover, the 2017 Scoping Plan sets statewide per capita GHG emissions targets of 6 MTCO_{2e} by 2030 and 2 MTCO_{2e} by 2050 (CARB Scoping Plan, p. 99). The Project proposes to create 588 new jobs, resulting in per-service population GHG emissions of at least 17 MTCO_{2e}/capita. This exceeds the 2050 target.³ Given that this reduction must be achieved within the Project's operational lifespan, it is evident that the Project will remain inconsistent with the 2017 Scoping Plan's long-term goals.

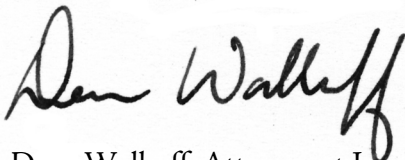
Consequently, because the Project is inconsistent with applicable plans for the reduction of GHGs, it is significant under the second threshold.

Conclusion

In conclusion, the Project would have a significant GHG impact under the chosen threshold of consistency with applicable plans because the Project is not consistent with the chosen threshold or the applicable plans, policies, and regulations for the reduction of GHGs. The Project's impacts are therefore significant, under the threshold adopted by the City. The City did not support, with substantial evidence, that the mitigation measures would demonstrate a less-than-significant impact.

Please put Advocates for the Environment on the list of interested parties to receive updates about the progress of this potential project approval. We make this request under Public Resources Code, section 21092.2.

Sincerely,



Dean Wallraff, Attorney at Law
Executive Director, Advocates for the Environment

³ $10,028 \text{ MTCO}_2e \div 588 \text{ employees} = 17.05 \text{ MTCO}_2e/\text{service population}$. (DEIR Appendix A, p. 75; 42.)

O8.3

O8.4

Letter 08

COMMENTER: Dean Wallraff, Attorney at Law, Executive Director, Advocates for the Environment

DATE: January 16, 2026

Response 08.1

The commenter restated the project.

This comment is acknowledged.

Response 08.2

The commenter states that the City should require the project to be net-zero in GHG, arguing that this would be feasible, cost-effective, and consistent with California's mandate to achieve statewide carbon neutrality by 2045. The commenter notes that major California developments have adopted net-zero designs following CEQA litigation, demonstrating that it is achievable even for large-scale projects.

This comment does not address the CEQA analysis of the project. CEQA does not require individual projects to achieve net-zero GHG emissions. CEQA requires the disclosure and evaluation of a project's environmental impacts and the identification of feasible mitigation measures to reduce potential significant impacts. As discussed in the IS/EIR, (Appendix A), the project's GHG emissions were estimated and evaluated using appropriate CEQA methodologies. The IS Air Quality analysis concludes that with implementation of Mitigation Measure AQ-1, operational emissions would be reduced to less than significant levels; therefore, additional mitigation is not required. Because there is no significant GHG impact, CEQA does not require additional mitigation, including a net-zero design requirement. Additionally, while the State of California has adopted a long-term statewide climate goal to achieve carbon neutrality by 2045, that goal is programmatic and not enforceable. Accordingly, net zero is a goal, not a regulatory requirement, and failure to achieve net zero does not constitute a CEQA impact or policy inconsistency. The recommended Operational Diesel Particulate and NO_x Emission Reduction Measures are requirements already established under state law; therefore, they would be implemented as part of normal project operations. To ensure that these measures are adequately implemented, the requirement to follow the SBCAPCD's Operational Diesel Particulate and NO_x Emission Reduction Measures shall be incorporated as a condition of approval. Under CEQA, lead agencies are encouraged to use thresholds of significance that are adopted by a regulatory agency through a public process and supported by substantial evidence, which SBCAPCD has done for its air quality and greenhouse gas thresholds. As the SBCAPCD is the recognized regional air quality authority responsible for evaluating and regulating air emissions within Santa Barbara County, including Santa Maria, the project relies on SBCAPCD thresholds and guidance for review of air quality and greenhouse gas emissions. Using SBCAPCD thresholds ensures that air quality impacts are evaluated according to regionally appropriate conditions, standards, and attainment status, aligning the City's environmental documents with countywide methods and regulatory expectations. Since net-zero emissions are not required under CEQA or state law, the project's GHG impacts are less than significant with mitigation, and no regulatory inconsistency or unmitigated significant impact has been demonstrated, there is no CEQA impact or policy inconsistency. No further response is required.

Response 08.3

The commenter states that the Draft EIR's conclusion of a less-than-significant GHG impact is not supported by substantial evidence. They state the analysis improperly relies on Appendix G and regulatory compliance to demonstrate significance and incorrectly assumes that consistency with certain plans automatically results in less-than-significant impacts. The commenter concludes that the project is significant under threshold 2 because it is not consistent with all applicable climate-related plans.

Refer to Response to comment A2.1 and O3.5 for a discussion of how greenhouse gas emissions were analyzed.

Response 08.4

The commenter requests to be added to the list of interested parties to receive updates regarding project approvals.

The City has added the commenter's contact information to the project notification list and shall provide future notices via email in accordance with CEQA and City procedures. No further response is required.

Letter 11

From: Mike Diani <miked@diani.com>
Sent: Wednesday, December 17, 2025 11:12 AM
To: Cody Graybehl <cgraybehl@cityofsantamaria.org>
Subject: Package Delivery Warehouse Planned Development Permit, 1680 West Stowell Road

*** EXTERNAL EMAIL: Please use caution when opening links or attachments.***

Cody,

My name is Mike Diani, and I live at 1689 West Stowell Road on a little more than 10 acres. We did annex into the City Limit around 2006, and my driveway is just East of the Humane Society.

2-159

My concern over this development and/or any additional developments in the area, is how storm water run-off is to be handled. Currently run-off is controlled by the open ditch on the north side of Stowell Road. The ditch goes in and out between the City and County along Stowell which complicates things, but the ditch currently does not handle the water accumulated during heavy down pours now. At times our driveway culverts back-up and water will overflow onto Stowell.

Just to the west of my driveway, a storm drain manhole was put in that connects the culvert under my driveway and the stormwater coming from DI's on S E Street on the South side of Stowell. This manhole redirects the water to flow back into the ditch along the Humane Society, and quite often debris flowing west through the open ditch gets trapped and clogs at this manhole backing up water on the Esat side of my Driveway and then overflowing onto Stowell and causing erosion at my entance. It is a constant maintenance issue for myself, and has the potential that at some point my driveway will get taken out.

So, my concern is how the new facility is planning to get rid of their excess storm water. Adding more water to this ditch will impact not only the ditch along Stowell Road which is not well maintained as it is, but also my driveway and the Humane Society Driveway.

I did look at the plans on your web site, but no off-site storm drainage is identified.

I know this is a little convoluted, but I would be more than willing to meet with you to explain this better if you need any clarifications.

Thank you.

Mike Diani
Cell: (805) 621-2800
miked@diani.com

11.1

11.2

Letter I1

COMMENTER: Michael J. Diani, President, Diani Building Corp.

DATE: December 17, 2025

Response I1.1

The commenter identifies themselves as a resident on West Stowell Road with property adjacent to the Humane Society and explains their concern about stormwater management for the proposed development. The commenter expresses concern that adding stormwater from the new facility will worsen existing excess runoff problems, impacting their driveway, the Humane Society driveway, and the poorly maintained ditch along Stowell Road. The commenter states that they reviewed the project plans online but found no indication of off-site storm drainage solutions.

Stormwater is discussed in the Initial Study Section 10, *Hydrology and Water Quality*. The Draft EIR project description states the proposed project is designed to manage stormwater onsite through required LID features, ensuring that post-development runoff does not exceed pre-development conditions. The project's stormwater plans will be reviewed and need City approval that they meet all City standards. No off-site drainage facilities are proposed or required, as the onsite LID system fully complies with City and Regional Water Board standards. No further response is required.

Response I1.2

The commenter offers to meet with city staff to clarify their concerns and provide additional details if needed.

The City Engineer (Mark Mueller) met with the commentor. No further response is required.

Fwd: West Stowell Road Package Delivery Warehouse

From John Hollinshead <kohola.john@gmail.com>
Date Thu 12/18/2025 1:22 PM
To Cody Graybehl <cgraybehl@cityofsantamaria.org>

*** EXTERNAL EMAIL: Please use caution when opening links or attachments.***

This email is from Dr. Carol Karamitsos
Sent from my iPhone

Begin forwarded message:

From: Carol Karamitsos CA-Santa Maria <carol.karamitsos@commonspirit.org>
Date: December 18, 2025 at 10:57:30 AM PST
To: kohola.john@gmail.com
Subject: West Stowell Road Package Delivery Warehouse

I would like to state my opposition to the proposed West Stowell Road Package Delivery Warehouse. I learned of this proposed project in the local news. The article details a 24/7 operation with an estimated 34 tractor-trailer rigs every day crowding already congested city streets due to the local agriculture industry with trucks coming from the fields to the coolers and larger trucks accessing the coolers. In addition, 345 vans or 72 vans per 20 minutes will be an additional burden and risk to our congested streets.

I2.1

This project will lie west of the 101 freeway necessitating the use of our city streets. The city of Santa Maria is largely residential in its composition. My family has lived on Palm Court Drive for over 30 years now, and we have personally witnessed the increased noise and pollution from the proliferation of vehicles. The vehicular traffic interferes with the hallmark needs of planning for a "liveable city". Vehicular traffic suppresses pedestrian and non-motorized transportation, stifling the human connection with each other and with our natural environment. Studies show that mental health improves when humans consistently have access to nature. Dynamic urban planning insists on sustainability in transportation and access to green spaces and to vibrant cultural activities.

I2.2

Santa Maria has been gradually losing its capacity to create spaces for individuals and families to comfortably congregate outdoors in quiet, tidy, accessible places for dining and for entertainment. The Santa Maria Town Center offers a strictly indoor experience. The local parks are not close to dining. We have large parking lots with rows of retail and fast food restaurants. Instead of outdoor multi-use spaces, we have enormous acreage devoted to lots for automobile sales. In addition, the City Council wants to encourage new industry for job growth, but the infrastructure for housing and schools is insufficient. The

I2.3

local school districts struggle to find sites that will support new schools despite the population growth. Families live in crowded conditions in single-family homes, one directly across the street from our home with about 20-25 people living in the one home.

12.3

If you were to survey young professionals who actually live in Santa Maria Valley, they would tell you that their options for casual leisure largely lie either in the Town of Old Orcutt or outside of our Valley. We have a large population of residents that have low financial resources. They do not have the option to drive out of the Valley but nonetheless also desire the beauty of a liveable city.

12.4

I urge you to reject this West Stowell Road Package Delivery Warehouse proposal for the residents of today and for our posterity.

Sincerely,

Dr. Carol Karamitsos

Caution: This email is both proprietary and confidential, and not intended for transmission to (or receipt by) any unauthorized person(s). If you believe that you have received this email in error, do not read any attachments. Instead, kindly reply to the sender stating that you have received the message in error. Then destroy it and any attachments. Thank you.

Letter I2

COMMENTER: Dr. Carol Karamitsos

DATE: December 18, 2025

Response I2.1

The commenter states that the project will operate 24/7 and involve approximately 34 tractor-trailer rigs daily, adding to already congested city streets impacted by agricultural truck traffic. The commenter states that 345 delivery vans (or 72 vans every 20 minutes) will further burden and risk congested streets. The commenter states that the site's location west of Highway 101 will necessitate heavy use of city streets.

The City acknowledges the commenter's concerns regarding existing traffic congestion. Under CEQA, traffic congestion is not considered an environmental impact; CEQA now evaluates transportation impacts based on VMT rather than LOS. As discussed in Response to comment A3.2, project related traffic would occur intermittently throughout the day outside school-related traffic periods. The project would not change roadway conditions in a way that would make travel more dangerous, and it does not add traffic at the times when students are typically on the road. Under CEQA, transportation safety is evaluated based on whether a project creates new or substantially increased hazards, not whether it increases congestion. The Draft EIR shows the project would not create hazardous conditions due to congestion, interfere with emergency response, nor impact multimodal safety; therefore, no safety impact would occur. Safety is addressed in Draft EIR Section 4.1, *Transportation* and Table ES-2, (Summary of Impacts). The Draft EIR concludes under Impact TRA-3 (Geometric Design Hazards) that the project would not substantially increase hazards due to roadway design features or incompatible land uses, and that impacts would be less than significant without mitigation. Similarly, Impact TRA-4 (Emergency Access) finds that the project would not result in inadequate emergency access, resulting in a less-than-significant impact. These findings demonstrate that the project would not create unsafe roadway conditions and that safety for all roadway users including pedestrians, bicyclists, and school-age children along the Stowell Road. No further response is required.

Response I2.2

The commenter states that Santa Maria is largely residential and increased traffic interferes with planning for a "liveable city." The commenter states that vehicular traffic suppresses pedestrian and non-motorized transportation, reducing human connection and access to nature, which benefits mental health. The commenter states that Santa Maria lacks outdoor multi-use spaces and has instead large parking lots and automobile sales areas, limiting opportunities for vibrant cultural activities and outdoor leisure.

This comment is acknowledged. This comment does not pertain to the proposed project or the environmental analysis presented in the Draft EIR, and no further response to this comment is required. As discussed in Response to comment A3.2, project related traffic would not occur during peak school traffic periods. Additionally, no evidence has been provided indicating that the proposed project would suppress pedestrian activity or other forms of non-motorized transportation. As discussed on pages 4.1-8 through 4.1-9 in the Draft EIR, the project would include internal striped walkways, ADA-compliant pedestrian routes, safety barriers, and frontage improvements on Stowell Road such as new sidewalk connections and the requirement to complete or fund completion of the missing sidewalk segment to the east of the site. These improvements support safe pedestrian circulation and enhance connectivity to the surrounding public right-of-way. No further response is required.

Response I2.3

The commenter states that while the City Council seeks job growth, infrastructure for housing and schools is insufficient. The commenter states that local school districts struggle to find sites for new schools despite population growth. The commenter states that families live in crowded conditions, citing an example of 20–25 people living in a single-family home.

The City acknowledges the concerns regarding housing availability, school capacity, and overcrowding in the community. The proposed project is a non-residential industrial development on industrially zoned land so would not conflict with the construction of housing and not generate population growth as discussed on page 5-1 of the Draft EIR or impact school facilities as discussed on pages 75-76 of the IS/EIR Appendix A. As discussed in the IS on the pages just identified, the proposed project does not induce substantial population growth and would draw primarily from the existing local workforce; therefore, it would not contribute to overcrowded housing conditions or require new or expanded school facilities. No further response is required.

Response I2.4

The commenter states that many residents have low financial resources and cannot easily travel outside the Valley for leisure, yet they desire a “liveable city” environment. The commenter urges rejection of the project for the benefit of current residents and future generations.

This comment is acknowledged. This comment does not pertain to the proposed project or the environmental analysis presented in the Draft EIR, and no further response to this comment is required.



Proposed "amazon" distribution concerns

From Carlos And Alicia Escobedo <escobedoca1025@yahoo.com>

Date Fri 12/19/2025 8:02 AM

To Cody Graybehl <cgraybehl@cityofsantamaria.org>

*** EXTERNAL EMAIL: Please use caution when opening links or attachments.***

Good morning I want to submit concerns regarding the proposed "un-named" amazon distribution center for stowell. First off traffic is already congested along this area and with the expansion of 1500 houses in the area plus a new jr high school this will make matters even worse. This brings up major safety concerns for drivers and more importantly school zones close to the area. On top of that amazon has no real training for the delivery drivers and anyone off the street can become a delivery driver which causes even more concerns when they are driving large delivery vehicles. Amazon drivers have 89% higher unsafe driving violation rates (speeding, phone use) than non-Amazon carriers. Adding to this is amazon workers are over worked and underpaid leading to more concerns. Low paying jobs is not what this area needs especially in exchange for more traffic and safety concerns in nearby school zones. Thank you for your time.

I3.1

I3.2

[Yahoo Mail: Search, Organize, Conquer](#)

Letter I3

COMMENTER: Carlos and Alicia Escobedo

DATE: December 19, 2025

Response I3.1

The commenter states that traffic is already congested in the area and that the addition of 1,500 new houses and a new junior high school will make congestion worse. The commenter states that these conditions raise major safety concerns for drivers and for school zones near the project site.

The City acknowledges the commenter's concerns regarding existing traffic congestion. Under CEQA, traffic congestion is not considered an environmental impact; CEQA now evaluates transportation impacts based on VMT rather than LOS that indicates the level of traffic congestion. As discussed in the TIS (IS/EIR Appendix C), project operations are not expected to coincide with peak school traffic periods so not contributing to peak school congestion and therefore not adding to safety concerns in school zones. The TIS provides further details regarding trip generation, distribution, and timing in section A-4 through A-7. The project would not change roadway conditions in a way that would make travel more dangerous, and it does not add traffic at the times when students are typically on the road. Under CEQA, transportation safety is evaluated based on whether a project creates new or substantially increased hazards, not whether it increases congestion. The Draft EIR shows the project would not create hazardous conditions, interfere with emergency response, nor enhance multimodal safety; therefore, no safety impact would occur. Safety is addressed in Draft EIR Section 4.1, *Transportation* and Table ES-2, (Summary of Impacts). The Draft EIR concludes under Impact TRA-3 (Geometric Design Hazards) that the project would not substantially increase hazards due to roadway design features or incompatible land uses, and that impacts would be less than significant without mitigation. Similarly, Impact TRA-4 (Emergency Access) finds that the project would not result in inadequate emergency access, also resulting in a less-than-significant impact. These findings demonstrate that the project would not create unsafe roadway conditions and that safety for all roadway users including pedestrians, bicyclists, and school-age children along the Stowell Road. Additionally, as discussed in Response to comment A3.2, project related traffic would not occur during the peak school traffic.

Additionally, the project evaluated potential cumulative traffic effects in combination with surrounding development. A full list of planned and pending projects considered in this analysis is provided in the Draft EIR on pages 3-3 through 3-6, and a corresponding discussion of cumulative transportation impacts is included on page 4.1-11 of the Draft EIR. These analyses confirm that while cumulative development contributes to regional VMT, the project would not exacerbate peak-hour school congestion or related pedestrian safety issues. No further response is required.

Response I3.2

The commenter states that the applicant does not provide adequate training for delivery drivers, allowing unqualified individuals to operate large delivery vehicles. The commenter states that delivery drivers have 89 percent higher unsafe driving violation rates (speeding, phone use) compared to other carriers. The commenter states that the applicant's workers are overworked and underpaid, which adds to safety concerns. The commenter states that low-paying jobs are not beneficial for the area, especially when combined with increased traffic and safety risks near schools.

This comment is acknowledged. This comment does not pertain to the environmental analysis presented in the Draft EIR, and no further response to this comment is required. Operation of the facility would be subject to all applicable licensing, permitting, and regulatory requirements, which the project applicant would be required to comply with. These requirements are not adopted or enforced by the City, however, the City has included a condition of approval requiring the applicant to comply with all federal, State, and County requirements.



Amazon package delivery warehouse public comment

From Tino Sanchez <sancheztino488@gmail.com>

Date Fri 12/19/2025 8:05 PM

To Cody Graybehl <cgraybehl@cityofsantamaria.org>

*** EXTERNAL EMAIL: Please use caution when opening links or attachments.***

Victor Jesus resident of Santa Maria . I am in favor of this project I do believe this is a great opportunity to bring hundreds of jobs for local and surrounding areas. As well boosting local economy and tax revenue. And may even attract other businesses. There operating hours should have minimal conflict with agriculture's peak hour which is early in the morning. Over all this is an amazing project. The City consistently advocates for growth and stability. Let this be an example on how we work together , and welcome anyone interested in bringing business to the region.

I4.1

Letter I4

COMMENTER: Victor Jesus, Santa Maria Resident

DATE: December 19, 2025

Response I4.1

The commenter expresses strong support for the proposed project and states that the project represents a great opportunity to create hundreds of jobs for local and surrounding communities, boost the local economy, and increase tax revenue. The commenter suggests that the project may attract additional businesses to the area and contribute to overall economic growth. The commenter notes that the facility's operating hours should have minimal conflict with peak agricultural hours, which occur early in the morning. The commenter concludes that this is an excellent project and encourages the City to use it as an example of collaboration and welcoming new business to the region.

This comment is acknowledged. No further response is required.

I5 - Voicemail Audio Transcription

COMMENTER: Anonymous

DATE: December 19, 2025

Yes, I just want to say I firmly oppose approval of this Amazon center warehouse in Santa Maria. I find it really abhorrent that everybody is trying to do this in secret. I've known about this for quite a long time since I live in a neighborhood where a lot of city employees live but I find it really disgusting that everybody is trying to hide this and sneak it up on us. I think it's wrong. all the people who are approving this will also have to drive on these streets and they're already horrible with traffic thank you.

I5.1

Letter I5

COMMENTER: Anonymous

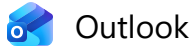
DATE: December 19, 2025

Response I5.1

The commenter left a voice message and expressed opposition to the project and the applicant's involvement in the proposed development.

This comment is acknowledged. This comment does not pertain to the environmental analysis presented in the Draft EIR, and no further response to this comment is required. Identification of the project applicant is not required by CEQA regulations.

Letter I6



Amazon package warehouse idea

From David Klein <kleinndavid9@gmail.com>

Date Sat 12/20/2025 6:13 AM

To Cody Graybehl <cgraybehl@cityofsantamaria.org>

*** EXTERNAL EMAIL: Please use caution when opening links or attachments.***

My name is David Klein and a Orcutt Resident. I suggest putting the Amazon warehouse on east stowell adjacent to cool had Luke's and upgrading the frontage road two way stop sign to a light. Thank you for your time. David

I6.1

Letter I6

COMMENTER: David Klein, Orcutt Resident

DATE: December 20, 2025

Response I6.1

The commenter suggests putting the proposed fulfillment center on east Stowell adjacent to restaurant Cool Ha[n]d Luke's and upgrading the frontage road two way stop sign to a light.

This comment is acknowledged. This comment does not pertain to the proposed project or the environmental analysis presented in the Draft EIR, and no further response to this comment is required.

Site selection and land use designations for the project were established through the City's General Plan and the West Stowell Specific Plan, which designates the project site for industrial/commercial manufacturing uses. The proposed warehouse has been submitted for development at this specific location consistent with those adopted plans. No further response is required.

PD2024-0003

From Jonathan S. Milder <jonathan@milderlawoffice.com>

Date Tue 12/23/2025 1:24 PM

To Cody Graybehl <cgraybehl@cityofsantamaria.org>

*** EXTERNAL EMAIL: Please use caution when opening links or attachments.***

My comments on the above-referenced project located at 1680 West Stowell Road.

I live and work in the City of Santa Maria. I oppose this project for the following reasons:

17.1

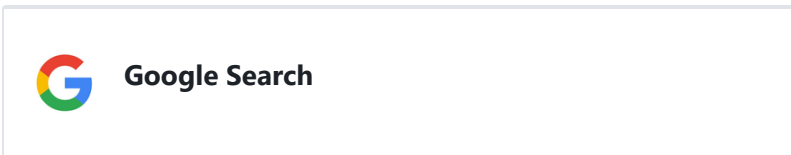
While I understand City leaders feel they do the community a service by brining in jobs, job that pay less than needed to afford to live here, this project will affect quality of life, health and safety.

1. Addressing the applicant - if they promise certain conditions will be met, be sure they are met. Impose strict monitoring and penalties on violations. After all, if the operator agrees to abide by conditions what fear do they have of a penalty for violation?

17.2

2. Why is the applicant unwilling to acknowledge the operator will be Amazon? What is the applicant afraid of? Why is the applicant not transparent (it may not be required to be transparent, but it has the option). It is likely because a simple google search reveals universal regret and unhappiness with the facility in the community. See [Google Search](#)

17.3



3. This project will have significant and unacceptable impacts to traffic can pedestrian safely - Stowell is a feeder road to SM High School.

17.4

4. The TRAFFIC mitigation measures have no penalty. They are not feasible and there is no consequence should mitigation have no affect on the impact. For example, if no employee volunteers for the commute program, as will likely be the case; if vanpool does not mitigate the impacts, and there is no time frame to convert to zero-emission vehicles, nor any study to the effects on the electricity in the community.

17.5

5. This is a terrible project that will significantly impact traffic, air quality and the community's (already not high) quality of life. NO OTHER COMMUNITY THAT HAS SUCH A FACILITY WOULD GO BACK AND APPROVE IT AGAIN, IF THE COMMUNITY COULD GO BACK IT WOULD DENY THE PERMIT.

17.6

I URGE THE DECISION-MAKERS TO DECIDE THE BEST INTERESTS OF THE CITIZENS NOT A DOT-COM BUSINESS.

Sincerely,

Jonathan S. Milder

301 East Cook Street, Suite A
Santa Maria, California 93454
Tp: 805-928-6008
Fx: 805-739-8806

Letter I7

COMMENTER: Jonathan S. Milder

DATE: December 23, 2025

Response I7.1

The commenter states they have concerns about quality of life, health and safety from implication of the project.

This comment is further addressed in the following responses below. No further response is required.

Response I7.2

The commenter urges that if the applicant promises to meet certain conditions, strict monitoring and penalties should be imposed for violations to ensure compliance.

This comment is acknowledged. This comment does not pertain to the proposed project or the environmental analysis presented in the Draft EIR, and no further response to this comment is required. The Final MMRP would be adopted by the City if they choose to approve the project and enforced by the noted responsible agency in the MMRP to ensure compliance with all required mitigation measures. The City is also proposing "Conditions of Approval" that identifies items required by the City in order to approve the project. These are outside of the CEQA process therefore not discussed here. No further response is required.

Response I7.3

The commenter questions why the applicant refuses to acknowledge the applicant as the operator.

This comment does not pertain to the environmental analysis presented in the Draft EIR, and no further response to this comment is required. Identification of the project applicant is not required by CEQA regulations.

Response I7.4

The commenter states that the project will have significant and unacceptable impacts on traffic and pedestrian safety, noting that Stowell Road is a feeder route to Santa Maria High School.

The City acknowledges the commenter's concerns regarding traffic safety. As discussed in the project's TIS (IS/EIR Appendix C), TIS, project operations are not expected to coincide with peak school traffic periods and therefore are not anticipated to create additional safety concerns in school zones. The TIS provides further detail regarding trip generation, distribution, and timing in section A-4 through A-7. Additionally, refer to Response to comment A3.2 which describes how project related traffic would not occur during the peak school traffic.

Response I7.5

The commenter states the traffic mitigation measures are infeasible and lacking enforcement mechanisms or penalties.

Under CEQA, mitigation measures adopted for the project would be included in the Final MMRP, which is required by State law and enforced by the City as the responsible agency or as identified in the MMRP. The MMRP would specify monitoring procedures, responsible parties, and compliance verification to ensure that required measures are implemented. No further response is required.

Response I7.6

The commenter states that the project will harm traffic, air quality, and community quality of life.

We acknowledge the author's opinion. However, because no supporting arguments, data, or analysis were provided to substantiate these assertions, we are unable to prepare a substantive response. We continue to stand by the analyses presented in the IS/EIR. No further response is required.

Letter I8

Dear Cody Graybehl,

Thank you for the opportunity to comment on the planned packing delivery warehouse.

I tried to look at the links city provided and did not find what I wanted pertaining to this project. Might be there but didn't see.

18.1

- **All of Stowell Rd, East and West, needs studying.**

I don't believe the traffic study is complete/detailed enough to see exactly how this will be impacting Stowell Rd in its entirety. In fact the ripple effect of this development will be far beyond West Stowell. (and west side of town feeder streets)

East Stowell Rd and Bradley needs to be studied (and its feeder streets). This intersection bottle necks at time now. To be expected with Hancock, shopping, freeway entrance North (Nicholson Ave.) and the hook on ramp south at Columbia Rd. What does the latests traffic study in this area say? What is the rating? (Study may be somewhere in your documents)

18.2

My concern is adding 345 daily vans, (realizing not all will be using the freeway on and off ramps, the majority will, to Stowell Rd. on and off ramps, as well as intersections. Adding 34 line-haul truck that will, along with existing big rig usage, will be gridlock that needs to be mitigated. The future expansion the City is leaning towards will further impact these intersection/ freeway exits and entrances.

18.3

- **Suggestions**

- **Look at Battles Rd as another route** (if you haven't already).
- **Build on and off ramps to 101 from Battles.**
- **Make changes/additions with turn lanes as needed along Battles.**

- **Consider adding a second lane to the North bound onramp at Nicholson and Stowell. Possible light in the future (as city developer).**

- **Evaluate South bound offramp at Columbia. Add a lane ?**
- **Continue to look for alternative routes.**

18.4

Regards,
Peggy Brierton
Santa Maria Resident

Letter I8

COMMENTER: Peggy Brierton, Santa Maria Resident

DATE: December 29, 2025

Response I8.1

The commenter stated that they attempted to review the City's provided links for the project but could not find the information and were unsure whether it was included.

The City added all documents to their website for downloading on or near 12/30/2025. The requested information on the project can be accessed at <https://www.cityofsantamaria.org/services/departments/community-development/planning-division/planning-policies-and-regulations/environmental-impact-reports>. No further response is required.

Response I8.2

The commenter states that the traffic study does not adequately analyze the full impact on Stowell Road, including both East and West sections and their feeder streets. The commenter also states that the ripple effect of the proposed development will extend beyond West Stowell to major intersections such as East Stowell and Bradley, which already experience bottlenecks due to nearby schools, shopping areas, and freeway access points.

The City acknowledges the commenter's concerns regarding existing traffic congestion. Under CEQA, traffic congestion is not considered an environmental impact; CEQA now evaluates transportation impacts based on VMT rather than LOS. As discussed on pages 7-15, of the TIS (IS/EIR Appendix C), the project evaluated a worst-case scenario by assigning all project traffic to Stowell Road and analyzing the intersections most likely to experience impacts. If traffic had been dispersed more broadly, the resulting volumes at other locations would have been too low to produce meaningful findings. The study followed City guidelines for impact time periods, study locations, and traffic distribution to ensure a conservative assessment. In addition, project van delivery drivers would use a trip route application based on real-time traffic data to avoid congested routes and identify the most efficient route for delivery of packages. Van delivery drivers would use residential streets only when delivering to a residence. No further response is required.

Response I8.3

The commenter states adding 345 daily delivery vans and 34 line-haul trucks to Stowell Road and surrounding intersections will lead to gridlock and worsen existing congestion.

The City acknowledges the commenter's concerns regarding existing traffic congestion. Under CEQA, traffic congestion is not considered an environmental impact; CEQA now evaluates transportation impacts based on VMT rather than LOS. Please refer to Response to comment A3.2 which describes how project related traffic would not occur during the peak school traffic. Additionally, the project evaluated potential cumulative traffic effects in combination with surrounding development. A full list of planned and pending projects considered in this analysis is provided in the Draft EIR on pages 3-3 through 3-6, and a corresponding discussion of cumulative transportation impacts is included on page 4.1-11 of the Draft EIR. These analyses confirm that while cumulative development contributes to regional VMT, the project would not exacerbate peak-hour school congestion or related pedestrian safety issues. No further response is required.

Response I8.4

The commenter suggests several mitigation measures:

- Study Battles Road as an alternative route.
- Build new on/off ramps to Highway 101 from Battles Road.
- Add turn lanes along Battles Road as needed.
- Consider adding a second lane to the northbound on-ramp at Nicholson and Stowell, and possibly a traffic signal.
- Evaluate adding a lane to the southbound off-ramp at Columbia Road.
- Continue exploring alternative routes to reduce congestion.

This comment is acknowledged. The suggested measures, including congestion-focused improvements, may improve LOS but they would not reduce VMT and therefore do not affect the project's transportation impact under CEQA. Based on the TIS and VMT Analysis, the project does not create significant roadway or congestion impacts, and CEQA evaluates transportation impacts solely through VMT, not LOS or roadway capacity. To address VMT, the Draft EIR includes Transportation Demand Management (TDM) measures focused on reducing employee commute-related VMT and improving operational efficiency. These measures could include implementation of employer commute programs, incentives for carpooling/vanpooling, transit subsidies, bicycle and pedestrian support features, and fleet-level operational strategies. However, even with these measures, the VMT impact remains significant and unavoidable. Additionally, project van delivery drivers would use a trip route application based on real-time traffic data to avoid congested routes and identify the most efficient route for delivery of packages. Van delivery drivers would use residential streets only when delivering to a residence. No further response is required.

Letter I9

 Outlook

From: Jose Alfredo Cardona Flores <cardonajose123@gmail.com>
Sent: Tuesday, January 20, 2026 8:23 AM
To: Web-Community Development <commdevweb@cityofsantamaria.org>
Subject: Stowell Warehouse

*** EXTERNAL EMAIL: Please use caution when opening links or attachments.***

Dear Planning Commission,

I am writing to submit a public comment regarding the proposed warehouse on Stowell Road. As a teacher at Santa Maria High School, I observe many students walking across this street daily.

The addition of a large warehouse would further degrade the safety and environment for these students. There is already a significant volume of large truck traffic on this street while children are commuting to school. I urge the Planning Commission to prioritize making our city more walkable and bike-friendly.

2-181

Please consider the safety of the young students who rely on these streets every day when making your decision.

Best regards,

--

Jose Alfredo Cardona Flores

Letter I9

COMMENTER: Jose Alfredo Cardona Flores

DATE: January 20, 2026

Response I9.1

The commenter states they have observed local high school students walk West Stowell Road and encourages the Planning Commission to consider traffic safety regarding the project and prioritize making the City more walkable and bike friendly.

The City acknowledges the commenter's concerns regarding traffic safety. As discussed in the project's TIS (IS/EIR Appendix C), TIS project operations are not expected to coincide with peak school traffic periods and therefore are not anticipated to create additional safety concerns in school zones. The TIS provides further details regarding trip generation, distribution, and timing in section A-4 through A-7. Additionally, please refer to Response to comment A3.2 which describes how project related traffic would not occur during the peak school traffic. No further response is required.

To the attention of the City of Santa Maria Planning Commission and Cody Graybehl

Letter I10

(Senior Planner
Planning Division
Community Development Department
City of Santa Maria)

We the undersigned register our names as testament to our opposition to the proposed project:
PD2024-0003 - Stowell Road Package Delivery Warehouse - 1680 W Stowell Rd.

Name - Signature - Address

- 1. Krista Kringel 219 Palm Court Dr. Santa Maria, CA 93454
- 2. Joel Kringel - Joel Kringel 219 Palm Court Dr. Santa Maria, CA 93454
- 3. Kimberly Velasquez 201 palm court Santa Maria Ca 93454
- 4. MATT RODENBERGER 120 PALM COURT DRIVE S.M. 93454
- 5. Andrew Brown 116 E. CAMINO COLEGIO, SM 93454
- 6. Jose Balbuena 323 E. Camino Colegio, S.M. 93454
- 7. Cristina Gonzalez 912 S. McCelland, SM 93454
- 8. Gale McNeeley Gale McNeeley 224 Palmf. Dr., SM 93454
- 9. John PRZYWARA John Przywar 224 Palm Court Dr SM 93454
- 10. Roger Hall Roger Hall 1107 speed st, SM 93454
- 11. Sasha Hall Saslehed 1107 speed st. 93454
- 12. JoCeleste Cavalletto JoCeleste Cavalletto 1216 speed st, SM 93454

I10.1

- 13.
- 14.
- 15.

Letter I10

COMMENTER: Dr. Carol Karamitsos

DATE: January 29, 2026

Response IO.1

The commenter provided a list of names in opposition to the proposed project.

This comment is acknowledged.

Refer to Response to comments O3.12 through O3.17. As described in Section 1.2, *Purpose and Legal Authority* of the Draft EIR, recirculation is only required where significant new information is added that shows a new or substantially increased environmental impact or a new feasible mitigation or alternative. None of the comments received provided significant new information requiring recirculation. No further response is required.

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3 Minor Revisions to the Draft EIR

This chapter presents specific text changes made to the Draft EIR since its publication and public review. The changes are presented in the order in which they appear in the original Draft EIR and are identified by the Draft EIR page number. Text deletions are shown in ~~striketrough~~, and text additions are shown in underline. The information contained within this chapter clarifies and expands on information in the Draft EIR and does not constitute “significant new information” requiring recirculation, as further described in Section 3.2, *Recirculation Not Warranted*.

3.1 Minor Revisions to the Draft EIR

Introduction

Mitigation Measure AQ-1 was updated in response to a comment received on the Draft EIR on page 1-9.

AQ-1 Line-Haul Trucks Requirement. The proposed project owner or operators shall require the use of line-haul trucks that meet standards for ~~Tier 4 Standards for off-road diesel engines on-road trucks~~ with model year 2014 or newer engines.

No environmental impacts would change as a result of this revision.

Mitigation Measure BIO-7-1 was updated to clarify when take avoidance surveys for burrowing owl are required.

BIO-7 Burrowing Owl Avoidance. The following measures shall be implemented in order to avoid and minimize impacts to burrowing owl.

1. Ground-disturbance activities associated with construction of the project shall begin outside of the burrowing owl nesting season (nesting season is typically February 1 through September 15) to the extent feasible. If construction is to occur during this time, take avoidance surveys shall occur as described under Section 2. below.
2. Not more than 30 days prior to initiation of ground-disturbing activities, and again within 24-hours of the initiation of ground-disturbing activities associated with construction during nesting season, a County-approved biologist shall conduct a take avoidance survey of the project site and surrounding areas to a distance of 150 meters, in accordance with the methods outlined in the Mitigation Methods –Pre-construction and Appendix D Surveys for Take Avoidance of the CDFG Staff Report on Burrowing Owl Mitigation (CDFG 2012).

No environmental impacts would change as a result of this revision.

Regulatory Setting

Regulatory setting information was updated in response to a comment received on the Draft EIR on page 4.1-5.

In December 2018, OPR issued a Technical Advisory on Evaluating Transportation Impacts in CEQA (OPR 2018). The technical advisory contains technical recommendations regarding assessment of VMT, thresholds of significance, and mitigation measures. The technical advisory suggests a significance threshold for VMT that is based on state mandated GHG emission reduction targets. The technical advisory recommends a quantitative per capita or per employee VMT that is 15 percent below that of existing development as a possible threshold of significance that would comply with the state’s long-term climate goals. In 2020, Caltrans updated its guidelines via the Transportation Impact Study Guide (2020) to use VMT as its primary metric for determining a project’s transportation impacts.

No environmental impacts would change as a result of this revision.

3.2 Recirculation Not Warranted

As presented in Section 3.1, *Minor Revisions to the Draft EIR*, minor revisions to the Draft EIR would not result in new significant impacts or a substantial increase in the severity of previously identified significant impacts. These minor revisions identify textual modifications to the Final EIR. The revised text serves to amplify, correct, supplement or clarify, information in the public review Draft EIR. It does not substantively affect the level of impact nor the conclusions presented. Therefore, recirculation of the Draft EIR is not warranted.

CEQA requires recirculation of a Draft EIR only when “significant new information” is added to a Draft EIR after public notice of the availability of the Draft EIR has occurred but before the EIR is certified (Public Resources Code Section 21092.1; *CEQA Guidelines* Section 15088.5). Recirculation is not required where the new information added to the EIR merely clarifies or amplifies or makes insignificant modifications in an adequate EIR (*CEQA Guidelines* Section 15088.5(b)).

The relevant portions of *CEQA Guidelines* Section 15088.5 (items a, b and e) read as follows:

- (a) A lead agency is required to recirculate an EIR when significant new information is added to the EIR after public notice is given of the availability of the draft EIR for public review under Section 15087 but before certification. As used in this section, the term “information” can include changes in the project or environmental setting as well as additional data or other information. New information added to an EIR is not “significant” unless the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect (including a feasible project alternative) that the project’s proponents have declined to implement. “Significant new information” requiring recirculation include, for example, a disclosure showing that:
 - 1) A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented.
 - 2) A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance.
 - 3) A feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the environmental impacts of the project, but the project’s proponents decline to adopt it.
 - 4) The draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded.
- (b) Recirculation is not required where the new information added to the EIR merely clarifies or amplifies or makes insignificant modifications in an adequate EIR.
- (e) A decision not to recirculate an EIR must be supported by substantial evidence in the administrative record.

Both Mitigation Measure AQ-1 and the regulatory setting were updated to reflect current agency guidance and best practices.

The information added to this Final EIR noted in this section above supplements, clarifies, amplifies, and corrects information in the Draft EIR. The City has reviewed the information in this chapter and has determined that it does not change any of the basic findings or conclusions of the EIR, does not constitute “significant new information” pursuant to *CEQA Guidelines* Section 15088.5, and does not require recirculation of the Draft EIR. This decision is supported by substantial evidence provided in this EIR.

4 Mitigation Monitoring and Reporting Program

CEQA requires that a reporting or monitoring program be adopted for the conditions of project approval that are necessary to mitigate or avoid significant effects on the environment (Public Resources Code 21081.6). This mitigation monitoring and reporting program is intended to track and ensure compliance with adopted mitigation measures during the project implementation phase. For each mitigation measure recommended in the Final Environmental Impact Report (Final EIR), specifications are made herein that identify the action required, the monitoring that must occur, and the agency or department responsible for oversight.

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Mitigation Measure/Condition of Approval	Action Required	Timing	Monitoring Requirements	Responsible Agency	Compliance Verification Initial	Compliance Verification Date	Compliance Verification Comments
Air Quality							
AQ-1 Line-Haul Trucks Requirement							
The proposed project owner or operators shall require the use of line-haul trucks that meet standards for on-road trucks with model year 2014 or newer engines.	<p>Requirements: Line-haul trucks shall meet standards for on-road trucks with model year 2014 or newer engines.</p> <p>Documentation: Annual report documenting compliance shall be provided to the City.</p>	Throughout construction and operation.	The Applicant will ensure all personnel understand the measures that shall be adhered to throughout construction and operation.	City of Santa Maria Community Development			
Biological Resources							
BIO-1 Initial Ground Disturbance Avoidance During Winter and Preconstruction Survey for Winter Months							
Initial site disturbance and grading for construction shall be planned to occur outside the winter rain season in which CRLF move through upland habitats. Initial site grading shall occur between May 1st and October 31st to avoid impacts to frogs using upland habitat during the rainy season. In addition, Mitigation Measures BIO-2 through BIO-4 shall be implemented to avoid or minimize project impacts on other wildlife species in addition to CRLF. If any CRLF are found in the work area, the animal shall be allowed to leave the work area under its own volition. If the frog does not leave the work area, work shall be delayed or halted in that location plus a 50-foot buffer until the frog can be captured and relocated to suitable habitat away from project impacts pursuant to authorization required by the USFWS. A report describing the methods and results of the survey shall be prepared by the biologist and submitted to the City within two weeks of the start of ground disturbance.	<p>Requirements: Initial site disturbance and grading shall be planned to occur between May 1st and October 31st to avoid impacts to frogs using upland habitat during the rainy season. In addition, Mitigation Measures BIO-2 through BIO-4 shall be implemented to avoid or minimize project impacts on other wildlife species in addition to CRLF.</p> <p>If construction must occur during winter months (from November 1 through April 30), a qualified biologist shall survey all areas proposed for temporary and permanent disturbance within 48 hours prior to initial ground disturbance to ensure no CRLF are present.</p> <p>If any CRLF are found in the work area, the animal shall be allowed to leave the work area under its own volition. If the frog does not leave the work area, work shall be delayed or halted in that location plus a 50-foot buffer until the frog can be captured and relocated to suitable habitat away from project impacts pursuant to authorization required by the USFWS.</p> <p>A report describing the methods and results of the survey shall be prepared by the biologist and submitted to the City within two weeks of the start of ground disturbance.</p> <p>Documentation: A report describing the methods and results of the survey shall be prepared by the biologist and submitted to the City within two weeks of the start of ground disturbance.</p>	<p>Initial site grading shall occur between May 1st and October 31st.</p> <p>If construction must occur during winter months (from November 1 through April 30), a qualified biologist shall survey all areas proposed for temporary and permanent disturbance within 48 hours prior to initial ground disturbance.</p> <p>Within two weeks of the start of ground disturbance, a report describing the methods and results of the survey shall be prepared by the biologist and submitted to the City.</p>	The biologist shall conduct a preconstruction survey prior to construction activities occurring during winter months and submit it to the City within two weeks of the start of ground disturbance.	City of Santa Maria Community Development			
BIO-2 Prepare and Present a Worker Environmental Awareness Program							
Prior to initiation of construction activities (including staging and mobilization), a qualified biologist shall conduct a Worker's Environmental Awareness Program (WEAP) training for all construction personnel. The training shall aid workers in recognizing special-status species, native birds, protected trees, ESHA, or other biological resources that may occur in the construction area. The specifics of this program shall include identification and habitats of special-status species with potential to occur in the project site, description of the regulatory status and general ecological characteristics of sensitive resources, review of the limits of construction, and an explanation of measures required to protect biological resources, with a special focus on CRLF. A fact sheet conveying this information shall be prepared for distribution to all contractors, their employers, and other personnel involved with construction. All employees shall sign a form provided by the trainer indicating they have attended the WEAP training and understand the information presented to them. The crew foreman shall be responsible for ensuring crew members adhere to the guidelines and restrictions designed to avoid impacts to biological resources. If new construction	<p>Requirements: The Applicant shall coordinate a qualified biologist to conduct a WEAP training for all construction personnel prior to the initiation of construction activities. If new personnel are added to the Project, the crew foreman shall ensure the new personnel receive the training before starting work. In addition, the crew foreman shall ensure all receive the WEAP training before starting work.</p> <p>The training shall include the following components:</p> <ul style="list-style-type: none"> • Identification and habitats of special-status species with potential to occur within the study area • Description of the regulatory status and general ecological characteristics of sensitive resources • Review of the limits of construction, and an explanation of measures required to protect biological resources, with a special focus on CRLF. 	All construction personnel shall receive the WEAP training prior to the initiation of construction activities (including staging and mobilization).	The crew foreman shall ensure that all construction personnel and new personnel that may be added to the Project receive the WEAP training and understand the material presented in the training.	City of Santa Maria Community Development			

Mitigation Measure/Condition of Approval	Action Required	Timing	Monitoring Requirements	Responsible Agency	Compliance Verification Initial	Compliance Verification Date	Compliance Verification Comments
<p>personnel are added to the project, the crew foreman shall ensure the new personnel receive the WEAP training before starting work.</p>	<p>Documentation: A fact sheet conveying the information components from the training shall be prepared for distribution to all contractors, their employers, and other personnel involved with construction. All employees shall sign a form provided by the trainer indicating they have attended the WEAP training and understand the information presented to them.</p>						
BIO-3 High Visibility Construction Fencing							
<p>A high-visibility construction fence (i.e., orange protection fence) together with a silt fence, or an approved wildlife exclusion fence (i.e., ERTEC Triple-function E-fence), shall be erected along the southern, eastern, and western perimeter of the site. To prevent animals from getting under the fence, the bottom edge of the fence shall be trenched into the ground to a depth of at least six (6) inches, and the soil recompact along either side. The fence shall remain in place throughout all construction and checked weekly by construction personnel for needed maintenance. The fence shall be inspected by construction personnel prior to the start of work each day in which at least one-quarter inch of precipitation has fallen within the prior 24 hours for CRLF that may have entered the work area or are disoriented on the outside of the fence. If any CRLF are found within the work area, the project biologist shall be contacted to inspect the site. If the animal(s) do not leave the site on their own volition, work shall be halted within 50 feet of the frog until the frog can be captured and relocated to suitable habitat away from project impacts pursuant to any authorization required by USFWS.</p>	<p>Requirements: A high-visibility construction fence (i.e., orange protection fence) together with a silt fence, or an approved wildlife exclusion fence (i.e., ERTEC Triple-function E-fence), shall be erected prior to the start of construction and shall remain in place throughout all construction.</p> <p>The fence shall be inspected by construction personnel weekly and prior to the start of work each day in which at least one-quarter inch of precipitation has fallen within the prior 24 hours.</p> <p>If any CRLF are found within the work area, the project biologist shall be contacted to inspect the site. If any CRLF remain onsite, work shall be halted within 50 feet of the frog until the frog can be captured and relocated to suitable habitat away from project impacts pursuant to any authorization required by USFWS.</p> <p>Documentation: Weekly report documenting compliance shall be provided to the City by construction personnel during construction.</p>	<p>A high-visibility construction fence (i.e., orange protection fence) together with a silt fence, or an approved wildlife exclusion fence (i.e., ERTEC Triple-function E-fence), shall be erected prior to the start of construction and shall remain in place throughout all construction.</p>	<p>The Applicant shall ensure all construction personnel understand the measures that shall be adhered to throughout construction.</p>	<p>City of Santa Maria Community Development</p>			
BIO-4 Prevent Entrapment of CRLF in Open Excavations and Trenches							
<p>During the period in which there are open trenches or excavations more than six (6) inches deep, such as during the excavation for building foundations or utility lines, escape ramps shall be installed so that CRLF and other wildlife that may have become entrapped have the ability to escape. Escape ramps shall consist of a 2:1 sloped soil area leading from the bottom to ground level. Alternatively, as a second option, a qualified biologist shall inspect open trenches each day prior to the start of work for entrapped animals. Alternatively, as a third option, all trenches/excavations can be completely covered with plywood, steel plates or similar material during overnight periods. If a CRLF individual is located in a trench by construction personnel, the qualified biologist shall be contacted immediately to assist with relocation upon authorization from USFWS. For common wildlife, the biologist shall capture and relocate the individual out of harm's way. Work shall be halted until the entrapped animal has been relocated.</p>	<p>Requirements: Escape ramps shall be installed during the period in which there are open trenches or excavations more than six (6) inches deep. Escape ramps shall consist of a 2:1 sloped soil area leading from the bottom to ground level.</p> <p>Alternatively, as a second option, a qualified biologist shall inspect open trenches each day prior to the start of work for entrapped animals.</p> <p>Alternatively, as a third option, all trenches/excavations can be completely covered with plywood, steel plates or similar material during overnight periods.</p> <p>If a CRLF individual is located in a trench by construction personnel, the qualified biologist shall be contacted immediately to assist with relocation upon authorization from USFWS. For common wildlife, the biologist shall capture and relocate the individual out of harm's way. Work shall be halted until the entrapped animal has been relocated.</p> <p>Documentation: Daily logs documenting the inspection or a report documenting the installation of ramps or covers used during overnight periods.</p>	<p>During the period in which there are open trenches or excavations more than six (6) inches deep, such as during the excavation for building foundations or utility lines, escape ramps shall be installed so that CRLF and other wildlife that may have become entrapped have the ability to escape.</p>	<p>The Applicant shall ensure all construction personnel understand the measures that shall be adhered to throughout construction.</p>	<p>City of Santa Maria Community Development</p>			

Mitigation Measure/Condition of Approval	Action Required	Timing	Monitoring Requirements	Responsible Agency	Compliance Verification Initial	Compliance Verification Date	Compliance Verification Comments
BIO-5 Vegetation Removal and Grading Avoidance During Nesting Season							
All initial site disturbance shall be limited to the time period between September 1 to October 31, if feasible, to avoid construction during the nesting season (February 1 to August 31) and to avoid the seasonal work restriction associated with the CRLF (November 1 to April 30, see Mitigation Measure BIO-1). Tree removal shall occur between September 1 and January 31 to avoid the nesting period. If vegetation removal and grading cannot feasibly be conducted during this time period, then Mitigation Measure BIO-6 shall be followed.	<p>Requirements: All initial site disturbance shall be limited to the time period between September 1 to October 31, if feasible.</p> <p>Tree removal shall occur between September 1 and January 31 to avoid the nesting period.</p> <p>If vegetation removal and grading cannot feasibly be conducted during this time period, then Mitigation Measure BIO-6 shall be followed.</p> <p>Documentation: Report documenting compliance shall be provided to the City during construction.</p>	All initial site disturbance shall be limited to the time period between September 1 to October 31, if feasible. Tree removal shall occur between September 1 and January 31 to avoid the nesting period.	The Applicant shall ensure all construction personnel understand the measures that shall be adhered to throughout construction.	City of Santa Maria Community Development			
BIO-6 Nesting Bird Preconstruction Survey							
For any initial construction (vegetation removal and grading) scheduled to start between February 1 and August 31, a qualified biologist shall conduct a preconstruction survey for nesting birds within a 250-foot buffer of project impact areas. The survey shall be conducted within seven days before the initiation of construction activities occurring during this time period. During this survey, the qualified biologist shall search for birds exhibiting nesting behavior and inspect all potential nest substrates in the impact and buffer areas. Any nests identified shall be monitored to determine if they are active. If no active nests are found, construction may proceed. If an active nest is found within 50 feet of the construction area, the biologist, in consultation with the City and CDFW as appropriate, shall determine the extent of a buffer to be established around the nest. The buffer shall be delineated with flagging, and no work shall take place within the buffer area until the young have left the nest, as determined by the qualified biologist. The applicant shall submit to the City a report from the qualified biologist documenting the methods and results of the survey.	<p>Requirements: The nesting bird survey shall be conducted on foot within the Project boundary, including a 250-foot buffer of project impact areas. The survey shall be conducted within seven days before the initiation of construction activities occurring during this time period.</p> <p>During this survey, the qualified biologist shall search for birds exhibiting nesting behavior and inspect all potential nest substrates in the impact and buffer areas. Any nests identified shall be monitored to determine if they are active. If no active nests are found, construction may proceed. If an active nest is found within 50 feet of the construction area, the biologist, in consultation with the City and CDFW as appropriate, shall determine the extent of a buffer to be established around the nest.</p> <p>Documentation: The qualified biologist will document survey findings, as required above, documenting the methods and results of the survey.</p>	If construction activities occur during the bird breeding season (February 1 to August 31), the Applicant shall retain a qualified biologist to conduct a preconstruction survey for nesting birds no more than 7 days prior to initiation of ground disturbance and/or vegetation removal activities.	The qualified biologist shall conduct nesting bird surveys prior to construction activities occurring during bird breeding season. In addition, any nets found during the survey shall be monitored to determine if they are active. In addition, the qualified biologist shall conduct applicable monitoring and reporting as required based on the results of the bird nesting surveys.	City of Santa Maria Community Development			
BIO-7 Burrowing Owl Avoidance							
<p>The following measures shall be implemented in order to avoid and minimize impacts to burrowing owl.</p> <ol style="list-style-type: none"> Ground-disturbance activities associated with construction of the project shall begin outside of the burrowing owl nesting season (nesting season is typically February 1 through September 15) to the extent feasible. If construction is to occur during this time, take avoidance surveys shall occur as described under Section 2. below. Not more than 30 days prior to initiation of ground-disturbing activities, and again within 24-hours of the initiation of ground-disturbing activities associated with construction during nesting season, a County-approved biologist shall conduct a take avoidance survey of the project site and surrounding areas to a distance of 150 meters, in accordance with the methods outlined in the Mitigation Methods –Pre-construction and Appendix D Surveys for Take Avoidance of the CDFG Staff Report on Burrowing Owl Mitigation (CDFG 2012). The pre-construction survey will cover all areas within 150 meters of the portion of the site where construction is scheduled to start. Areas within 150 meters that are not accessible due to property access restrictions shall be surveyed using binoculars. Surveys will be phased, based on the grading and construction schedule, such that they are conducted not more than 30 days before the start of ground disturbing activities in new areas. 	<p>Requirements: Ground-disturbing activities shall occur outside of the burrowing owl nesting season (typically February 1 through September 15). If construction is to occur during this time, take avoidance surveys shall occur as described under Section 2.</p> <p>Not more than 30 days prior to the start of ground-disturbing activities, and again within 24 hours of the initiation of ground-disturbing activities, a County-approved biologist shall conduct a take avoidance survey of the project site and surrounding areas to a distance of 150 meters. Areas within 150 meters that are not accessible due to property access restrictions shall be surveyed using binoculars.</p> <p>If grading and/or construction activities in portions of the site cease for a period of 14 days, those portions of the site will be resurveyed for burrowing owls prior to the resumption of grading and/or construction activities.</p> <p>If occupied burrows are identified on the site or within 150 meters of the Project disturbance area, one of the following actions shall be taken: 1) permanent avoidance of the burrow or 2) establishment of a temporary avoidance buffer</p>	30-days prior to the start of ground-disturbing activities and again within 24 hours of the initiation of ground-disturbing activities	The Applicant shall ensure all construction personnel understand the measures that shall be adhered to throughout construction.	City of Santa Maria Community Development			

Mitigation Measure/Condition of Approval	Action Required	Timing	Monitoring Requirements	Responsible Agency	Compliance Verification Initial	Compliance Verification Date	Compliance Verification Comments
<p>If grading and/or construction activities in portions of the site cease for a period of 14 days, those portions of the site will be resurveyed for burrowing owls prior to the resumption of grading and/or construction activities. If no occupied (breeding or wintering) burrowing owl burrows are identified, no further mitigation would be required. If occupied burrows are identified on the site or within 150 meters of the Project disturbance area, one of the following actions shall be taken: 1) permanent avoidance of the burrow or 2) establishment of a temporary avoidance buffer followed by passive relocation and compensatory mitigation for loss of habitat in conjunction with the measures below:</p> <ol style="list-style-type: none"> 3. Site-specific, no-disturbance buffer zones shall be established and maintained between Project activities and occupied burrows, using the distances recommended in the CDFW guidelines (CDFG 2012) or as otherwise determined appropriate by the County-approved biologist in consultation with CDFW. 4. During the non-breeding season, if an occupied burrow cannot be avoided, and the burrow is not actively in use as a nest, the burrowing owls can be excluded from burrows in accordance with an approved Burrowing Owl Exclusion Plan, which shall be prepared and submitted for approval by CDFW prior to passive relocation of any burrowing owls. The Burrowing Owl Exclusion Plan shall be based on the recommendations made in the CDFG Staff Report on Burrowing Owl Mitigation (CDFG 2012) and shall include the following information for each proposed passive relocation: 5. Confirmation by site surveillance that the burrow(s) is empty of burrowing owls and other species; 6. Identification of type of scope to be used and appropriate timing of scoping; 7. Occupancy factors to look for and what shall guide determination of vacancy and excavation timing; 8. Methods for burrow excavation; 9. Removal of other potential owl burrow surrogates or refugia on site; 10. Methods for photographic documentation of the excavation and closure of the burrow; 11. Monitoring of the site to evaluate success and, if needed, to implement remedial measures to prevent subsequent owl use to avoid take; 12. Methods for assuring the impacted site shall continually be made inhospitable to burrowing owls and fossorial mammals; and 13. Method(s) for compensatory mitigation for burrow loss. 	<p>followed by passive relocation and compensatory mitigation for loss of habitat, in conjunction with the following measures:</p> <ul style="list-style-type: none"> • Establishing and maintaining site-specific, no-disturbance buffer zones • During the non-breeding season, if an occupied burrow cannot be avoided, and the burrow is not actively in use as a nest, the burrowing owls can be excluded from burrows in accordance with an Burrowing Owl Exclusion Plan, which shall be prepared and submitted for approval by CDFW prior to passive relocation of burrowing owls • Confirmation by site surveillance that the burrow(s) is empty of burrowing owls and other species; • Identification of type of scope to be used and appropriate timing of scoping; • Occupancy factors to look for and what shall guide determination of vacancy and excavation timing; • Methods for burrow excavation; • Removal of other potential owl burrow surrogates or refugia on site; • Methods for photographic documentation of the excavation and closure of the burrow; • Monitoring of the site to evaluate success and, if needed, to implement remedial measures to prevent subsequent owl use to avoid take; • Methods for assuring the impacted site shall continually be made inhospitable to burrowing owls and fossorial mammals; and • Method(s) for compensatory mitigation for burrow loss. <p>Documentation: A County-approved biologist shall prepare an approved Burrowing Owl Exclusion Plan, if applicable.</p>						
Cultural Resources							
CR-1 Extended Phase I Assessment							
<p>Prior to issuance of a grading permit and/or excavation activities an Extended Phase I (XPI) archaeological testing program shall be performed to determine the presence or absence of archaeological deposits at the project site. The XPI may include mechanical backhoe trenching; use of a backhoe will allow for an efficient examination of the soil profile and an assessment of the potential for buried archaeological deposits to be present. This study shall be conducted under the direction of a qualified archaeologist. XPI testing shall be observed by a Native American monitor. An XPI conducted prior to project construction could reduce potential delays caused by unanticipated finds during construction by informing the applicant of the types of resources that may exist on the property. Should a subsurface archaeological resource be found during the XPI, impacts to the resource shall be avoided and</p>	<p>Requirements: An Extended Phase I (XPI) archaeological testing program shall be performed under the direction of a qualified archaeologist and observed by a Native American monitor. Should a subsurface archaeological resource be found during the XPI, impacts to the resource shall be avoided and preserved in place through project redesign.</p> <p>If project redesign is not feasible and impacts to the resource cannot be avoided, a Phase II significance evaluation shall be performed to determine if the resource is eligible for the CRHR and/or the NRHP. A qualified archaeologist shall prepare a Phase II work plan for review and approval.</p>	<p>Prior to issuance of a grading permit and/or excavation activities an Extended Phase I (XPI) archaeological testing program shall be performed to determine the presence or absence of archaeological deposits at the project site.</p>	<p>Completion of this mitigation measure shall be monitored and enforced by the City of Santa Maria in consultation with the Native American monitor.</p>	<p>City of Santa Maria Community Development</p>			

Mitigation Measure/Condition of Approval	Action Required	Timing	Monitoring Requirements	Responsible Agency	Compliance Verification Initial	Compliance Verification Date	Compliance Verification Comments
<p>preserved in place through project redesign. Avoidance and preservation in place may include capping the resources with fill soil. If project redesign is not feasible and impacts to the resource cannot be avoided, a Phase II significance evaluation shall be performed to determine if the resource is eligible for the CRHR and/or the NRHP. A qualified archaeologist shall prepare a Phase II work plan for review and approval. The Phase II work plan shall address the archaeological excavation, analysis of recovered materials, and report preparation necessary to evaluate the significance of the resource. If the Phase II significance evaluation determines the resource is eligible for the CRHR and/or the NRHP and is considered a significant resource, and impacts to the resource cannot be avoided, then a Phase III data recovery excavation shall be conducted to mitigate impacts to the resource. A qualified archaeologist shall prepare a Phase III work plan/research design for review and approval. The Phase III work plan/research design shall address the archaeological excavation, analysis of recovered materials to answer specific research questions, and technical report preparation necessary to recover, analyze, and interpret the archaeological data associated with the portion(s) of the resources impacted by the project.</p>	<p>If the Phase II significance evaluation determines the resource is eligible for the CRHR and/or the NRHP and is considered a significant resource, and impacts to the resource cannot be avoided, then a Phase III data recovery excavation shall be conducted to mitigate impacts to the resource. A qualified archaeologist shall prepare a Phase III work plan/research design for review and approval.</p> <p>Documentation: An XPI testing program work plan that will be implemented by a qualified archaeologist. A Phase II or III work plan may be required.</p>						
Geology and Soils							
GEO-1 Unanticipated Discovery of Paleontological Resources							
<p>Paleontological Worker Environmental Awareness Program. Prior to the start of construction, a Qualified Professional Paleontologist, as defined by the Society of Vertebrate Paleontology (SVP; 2010), or their designee shall conduct a paleontological WEAP training for construction personnel regarding the appearance of fossils and the procedures for notifying paleontological staff should fossils be discovered by construction personnel. The WEAP shall discuss the potential to discover paleontological resources in the project site, legal obligations to protect paleontological resources, examples of paleontological resources that may be found in the project site, procedures in case a paleontological resource is discovered, and contact information for the Qualified Professional Paleontologist.</p> <p>Unanticipated Discovery of Paleontological Resources. If a potential fossil is discovered during project construction, construction activity within 50 feet of the find shall cease until the discovery is examined by a Qualified Professional Paleontologist. If the find is determined to be significant, the Qualified Professional Paleontologist shall direct all mitigation measures related to paleontological resources consistent with the SVP (2010) standards, which may include, but would not be limited to: paleontological monitoring; fossil salvage, preparation, and curation; and reporting to summarize the paleontological mitigation efforts.</p>	<p>Requirements: The Applicant shall coordinate a Qualified Professional Paleontologist to conduct a paleontological WEAP training for construction personnel regarding the appearance of fossils and the procedures for notifying paleontological staff should fossils be discovered by construction personnel. If new personnel are added to the Project, the crew foreman shall ensure the new personnel receive the training before starting work. In addition, the crew foreman shall ensure all receive the WEAP training before starting work</p> <p>If a potential fossil is discovered during project construction, construction activity within 50 feet of the find shall cease until the discovery is examined by a Qualified Professional Paleontologist. If the find is determined to be significant, the Qualified Professional Paleontologist shall direct all mitigation measures related to paleontological resources consistent with the SVP (2010) standards.</p> <p>Documentation: All employees shall sign a form provided by the trainer indicating they have attended the WEAP training and understand the information presented to them.</p>	<p>Prior to the start of construction, a Qualified Professional Paleontologist, as defined by the Society of Vertebrate Paleontology (SVP; 2010), or their designee shall conduct a paleontological WEAP training for construction personnel regarding the appearance of fossils and the procedures for notifying paleontological staff should fossils be discovered by construction personnel.</p> <p>If a potential fossil is discovered during project construction, construction activity within 50 feet of the find shall cease until the discovery is examined by a Qualified Professional Paleontologist.</p>	<p>The crew foreman shall ensure that all construction personnel and new personnel that may be added to the Project receive the WEAP training and understand the material presented in the training.</p>	<p>City of Santa Maria Community Development</p>			
Hazards and Hazardous Materials							
HAZ-1 Soil Management Plan							
<p>Prior to commencement of construction and grading activities at the project site, the project applicant shall retain a qualified environmental consultant (Professional Geologist or Professional Engineer) to prepare a Soil Management Plan (SMP) for the project site. The SMP shall address:</p> <ol style="list-style-type: none"> 1. On-site handling and management of impacted soils or other impacted wastes (e.g., stained soil, and soil with solvent or chemical odors) if such soils or impacted wastes are encountered, and 2. Specific actions to reduce hazards to construction workers and off-site receptors during the construction 	<p>Requirements: The Applicant shall retain a qualified environmental consultant (i.e., Professional Geologist or Professional Engineer) to prepare a SMP for the project. The SMP shall address:</p> <ol style="list-style-type: none"> 1. On-site handling and management of impacted soils or other impacted wastes (e.g., stained soil, and soil with solvent or chemical odors) if such soils or impacted wastes are encountered, and 2. Specific actions to reduce hazards to construction workers and off-site receptors during the construction 	<p>Prior to the commencement of construction and grading activities at the project site, and prior to the issuance of grading permits, the Applicant shall obtain the SMP prepared by the qualified environmental consultant (i.e., Professional Geologist or Professional Engineer), and reviewed by the City.</p>	<p>The Applicant or their designee shall implement the SMP during demolition, grading, and construction at the Project.</p>	<p>City of Santa Maria Community Development</p>			

Mitigation Measure/Condition of Approval	Action Required	Timing	Monitoring Requirements	Responsible Agency	Compliance Verification Initial	Compliance Verification Date	Compliance Verification Comments
<p>The plan must establish engineering controls and soil management practices to protect construction worker safety, protect the health of future workers and visitors, and prevent the off-site migration of contaminants from the project. These measures and practices shall include, but are not limited to:</p> <ul style="list-style-type: none"> • Stockpile management, including stormwater pollution prevention and the installation of best management practices. • Proper disposal procedures of contaminated materials. • Investigation procedures for encountering known and unexpected odorous or visually stained soils, other indications of hydrocarbon piping or equipment, and/or debris during ground-disturbing activities. • Monitoring and reporting. • An environmental health and safety plan for contractors working at the project site that addresses the safety and health hazards of each phase of site construction activities with the requirements and procedures for employee protection. • An environmental health and safety plan for contractors working at the project site that addresses the safety and health hazards of each phase of site construction activities with the requirements and procedures for employee protection. <p>The City shall review the SMP and have the authority to propose and include modifications prior to finalization of the SMP. The City shall review the final SMP prior to issuance of grading permits. The project applicant shall implement the SMP during demolition, grading, and construction at the project site.</p>	<p>The SMP must establish engineering controls and soil management practices to ensure construction worker safety, ensure the health of future workers and visitors, and prevent the off-site migration of contaminants from the project. These measures and practices shall include, but are not limited to:</p> <ul style="list-style-type: none"> • Stockpile management, including stormwater pollution prevention and the installation of best management practices. • Proper disposal procedures of contaminated materials. • Investigation procedures for encountering known and unexpected odorous or visually stained soils, other indications of hydrocarbon piping or equipment, and/or debris during ground-disturbing activities. • Monitoring and reporting. • An environmental health and safety plan for contractors working at the project site that addresses the safety and health hazards of each phase of site construction activities with the requirements and procedures for employee protection. • An environmental health and safety plan for contractors working at the project site that addresses the safety and health hazards of each phase of site construction activities with the requirements and procedures for employee protection. <p>Documentation: The qualified environmental consultant (i.e., Professional Geologist or Professional Engineer) will prepare a SMP for review by the City prior to commencement of construction and grading activities at the project site and prior to issuing grading permits. The project applicant shall implement the SMP during demolition, grading, and construction at the project site.</p>						
Transportation							
TR-1 Travel Demand Management							
<p>The project applicant shall implement at least one of the measures described below:</p> <ul style="list-style-type: none"> • Voluntary Employer Commute Program: The project applicant shall encourage alternative modes of transportation through a program that may include elements such as: a carpool or vanpool program, subsidized or discounted transit passes, bike amenities, commute trip-reduction marketing, and preferential parking permit program. • Employer Carpool Program: The project applicant shall encourage carpooling by providing ride matching assistance to employees, providing priority parking for carshare vehicles, and providing incentives for carpooling. <p>The applicant shall provide to the City documentation that at least one of the above measures is implemented within 1 year of certificate of occupancy. Documentation shall be provided annually.</p>	<p>Requirements: The project applicant shall implement at least one of the following measures:</p> <ul style="list-style-type: none"> • Voluntary Employer Commute Program • Employer Carpool Program <p>Documentation: Annual report documenting compliance shall be provided to the City within 1 year of certificate of occupancy and shall be provided annually thereafter.</p>	<p>Within 1 year of certificate of occupancy and annually thereafter</p>	<p>Completion of this mitigation measure shall be monitored and enforced by the City of Santa Maria.</p>	<p>City of Santa Maria Community Development</p>			

Mitigation Measure/Condition of Approval	Action Required	Timing	Monitoring Requirements	Responsible Agency	Compliance Verification Initial	Compliance Verification Date	Compliance Verification Comments
TR-2 Project-Level Transportation Demand Management (TDM) Strategies							
<ul style="list-style-type: none"> • Carpool/Vanpool Incentives: Provide priority parking, subsidies, or guaranteed ride home programs. • Transit Subsidies: Offer free or discounted transit passes to employees. • Pedestrian Infrastructure: Complete sidewalk gap on Stowell Road to the east of the site or contribute to fair share cost for construction at appropriate time. • Bike Infrastructure: Install secure bike parking, showers, and lockers to encourage cycling. • Flexible Work Hours: Reduce peak-hour congestion and VMT by staggering shifts. • On-Site Amenities: Cafeterias, childcare, and banking reduce off-site trips. • Ride-Sharing Programs: Partner with services like Uber/Lyft for shared rides. • Telematics and Routing Optimization: Use software to reduce delivery trip lengths and improve efficiency. <p>The applicant shall provide to the City documentation that at least four of the above measures are implemented within 1 year of certificate of occupancy. Documentation shall be provided annually.</p>	<p>Requirements: The project applicant shall implement at least four of the following measures:</p> <ul style="list-style-type: none"> • Carpool/Vanpool Incentives • Transit Subsidies • Pedestrian Infrastructure • Bike Infrastructure • Flexible Work Hours • On-Site Amenities • Ride-Sharing Programs • Telematics and Routing Optimization <p>Documentation: Annual report documenting compliance shall be provided to the City within 1 year of certificate of occupancy and shall be provided annually thereafter.</p>	Within 1 year of certificate of occupancy and annually thereafter	Completion of this mitigation measure shall be monitored and enforced by the City of Santa Maria.	City of Santa Maria Community Development			
TR-3 Fleet and Operational Measures							
<ul style="list-style-type: none"> • Zero-Emission Delivery Vehicles: Transition to electric or hydrogen-powered trucks. • Idle Reduction Policies: Enforce limits on truck idling. • Off-Peak Delivery Scheduling: Reduce congestion and trip times. • Local Sourcing and Distribution Hubs: Minimize long-haul trips by decentralizing distribution. <p>The applicant shall provide to the City documentation that at least one of the above measures is implemented within 1 year of certificate of occupancy. Documentation shall be provided annually.</p>	<p>Requirements: The project applicant shall implement at least four of the following measures:</p> <ul style="list-style-type: none"> • Zero-Emission Delivery Vehicles • Idle Reduction Policies • Off-Peak Delivery Scheduling • Local Sourcing and Distribution Hubs <p>Documentation: Annual report documenting compliance shall be provided to the City within 1 year of certificate of occupancy and shall be provided annually thereafter.</p>	Within 1 year of certificate of occupancy and annually thereafter	Completion of this mitigation measure shall be monitored and enforced by the City of Santa Maria.	City of Santa Maria Community Development			

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