

EXHIBIT 4

Applicant Justification Letter

ATTACHMENT 2
GENERAL PLAN AMENDMENT AND ZONE CHANGE FROM AG/AE TO OPEN SPACE/OS-10AC
AND ZONING ORDINANCE TEXT AMENDMENT
ADDITION OF LUMBER STORAGE TO VCNCZO OS ZONE
REASON/JUSTIFICATION FOR REQUESTED CHANGES

Hagle Lumber is located at 3100 Somis Road, in Somis. The business is located on APNs 163-0-010-850 and on a portion of APN 163-0-010-795. APN 163-0-010-795 is a split zoned parcel with 4.81 acres zoned M-2 and the remaining 37.42 acres zoned A-E. Our request is to rezone 10.57 acres of the A-E zoned portion of the property to Open Space (OS) to allow for the open storage of lumber. This 10.57 acres is immediately adjacent to the M-2 zoned portion of the property. This change will require a General Plan Amendment from Agriculture to Open Space, a zone change from A-E to OS-10 acres and a Non-Coastal Zoning Ordinance Text Amendment to permit lumber storage in the OS zone.

This additional lumber storage space is needed to accommodate changes in the lumber industry. New building code standards require various fire rated lumber products which results in the need for additional storage space. Also, there has been a regional increase in the demand for lumber which has necessitated the need for additional lumber storage space outside of the existing M-2 zoned property. Lumber storage is very similar to "Stockpiling of Construction Related Debris and/or Fill Material for Non-agricultural Operations" which is a permitted use in the Open Space (OS) zone with a Planning Director approved CUP.

This request is only for the 10.57 acre portion of the parcel that is immediately adjacent to the M-2 zone and is needed for the storage of lumber. It will not result in the premature conversion of land currently zoned AE to OS.

Section 8104-1.1 of the Non-Coastal Zoning Ordinance lists purposes of the Open Space (OS) zone. One of the purposes is to promote efficient municipal services and facilities by confining urban development to defined urban areas. Approval of this GPA and zone change to OS and approval of the zoning ordinance text amendment to permit lumber storage in the OS zone will allow the storage of lumber without the need to expand the M-2 zone and Existing Community Designation. A previously proposed solution to the need for additional lumber storage space was to process a GPA and zone change on this 10.57 acres from AE to M-2. When this idea was presented to the Somis MAC, members of the community were concerned about future uses of the increased M-2 zoned parcel. They were fine with the storage of lumber, but what happens if the property is sold and someone comes in with plans to build out the 10.57 acres with a different use permitted in the M-2 zone? This proposed request to OS will not permit that scenario to occur.

The proposed Zoning Ordinance Text Amendment includes specific requirements and limitations for lumber storage to be an allowed use on an OS zoned property. It must be on OS property immediately adjacent to a permitted Lumber Processing Operation on M-2 zoned property and served by an active rail spur. The Lumber Processing Operation in the M-2 zone and the lumber storage must be contained on

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land held under common ownership. The proposed amendment also expressly prohibits processing and manufacturing activities, and includes mandatory findings of compatibility with adjacent agricultural land.

There are a number of General Plan Policies and Programs that this project complies with due to the delivery of lumber by rail cars. CTM-4.1 calls for a reduction in Vehicle Miles Traveled. CTM 4.2 encourages alternative modes of transportation and CTM 6.1 encourages the use of Alternative Transportation Options. Also, HAZ10-6 calls on the County to facilitate alternative transportation modes within the County.

Attachment A is an excerpt from a report Hagle Lumber receives annually from Union Pacific Railroad. It includes information that compares the carbon footprint of Union Pacific Railroad shipments to the carbon footprint of comparative truck shipments. Between January 1, 2023 and December 31, 2023 there were a total of 263 shipments of lumber on Union Pacific trains which equated to 26,989 tons of lumber shipped over 337,797 miles. The carbon footprint of those Union Pacific shipments was 520 metric tons CO2 equivalent, compared to 2,210 metric tons CO2 equivalent if the same amount of lumber was shipped in trucks.

The 2050 Soar Initiative permits the Board of Supervisors, without a vote of the people, to redesignate "Agricultural" designated properties to Open Space if the following findings can be supported by substantial evidence:

1. The land proposed for redesignation has not been used for agricultural purposes in the past 2 years and is unusable for agriculture due to its topography, drainage, flooding, adverse soil conditions or other physical reasons. *This 10.57 acres has never been farmed and is too small of a parcel to be commercially viable for agricultural production.*
2. The land proposed or redesignation is immediately adjacent to areas developed in a manner compatible with the uses allowed in Open Space. *This property is immediately adjacent to the Arroyo Los Posas and a pond used for recreational fishing.*
3. Adequate public services and facilities are available and have the capacity and capability to accommodate the Open Space uses allowed. *We are requesting lumber storage only as the proposed permitted use so no additional public services and facilities will be required.*
4. The proposed redesignation is compatible with agricultural uses, does not interfere with accepted agricultural practices, and does not adversely affect the stability of land use patterns in the area. *The idea of lumber storage in this area has been presented to the County's APAC and they fully support this use on this property as it is not seen as a viable, stand-alone agricultural parcel.*
5. The land proposed for redesignation does not exceed 40 acres for any one landowner in any calendar year, and one landowner may not obtain redesignation pursuant to this subdivision more than every other year. Landowners with any unity of interest are considered one land owner for purposes of this limitation. *GPA and rezone request is for property less than 40 acres.*
6. Notice of such proposed modification is given according to the County's standard notice requirements to neighboring properties and as well, not less than 30 days prior to the proposed modification appearing on the BOS agenda, to LAFCo, to the city in whose area of interest the property to be redesigned is located, and to all individuals or organizations who or which have indicated as desire for such Notice by requesting the same by placing his/her/its name and contact information with the Clerk of the BOS. *So noted.*

HAGLE LUMBER CO. INC.

At Union Pacific, we believe that when you're part of the American landscape -- you protect it. Engaging stakeholders, including customers and employees, through our carbon disclosure, Union Pacific reaffirms our resolve to continue innovating for environmental progress. Ultimately, this supports our commitment to providing the nation with safe, efficient and sustainable freight solutions.

The chart below is an estimated carbon footprint of your Union Pacific rail shipments sent between January 1, 2023 and December 31, 2023 and shows the positive impact compared to the estimated footprint of similar truck shipments. One ton of freight can be moved 454 miles on a single gallon of diesel fuel and our trains are up to four times more fuel efficient than trucks.

| Equipment Type | Union Pacific Total Shipments | Total Tons | Total Loaded Miles | Carbon Footprint of Union Pacific Shipments* | Carbon Footprint of Comparative Truck Shipments* | Total Carbon Emission Savings* |
|----------------|-------------------------------|---------------|--------------------|--|--|--------------------------------|
| Box Car | 25 | 2,288 | 53,962 | 80 | 350 | 270 |
| Flat Car | 238 | 24,703 | 283,835 | 440 | 1,860 | 1,420 |
| Total | 263 | 26,989 | 337,797 | 520 | 2,210 | 1,690 |

*Estimated Rail and Truck Carbon Footprint in Metric Tons CO₂ Equivalent. Emission Factors from The Climate Registry General Reporting Protocol C02e includes Carbon Dioxide (CO₂) or Carbon Dioxide Equivalent, Methane (CH₄), and Nitrous Oxide (N₂O).

Union Pacific is committed to protecting the environment now and for future generations. Our annual [Building America Report](#) outlines our company's efforts. Please share this information with others in your company and if you have any questions please contact your sales representative.

Thank you for choosing Union Pacific as your freight service provider.

Kenny Rocker
Executive Vice President - Marketing & Sales

Use our [Carbon Emission Estimator](#) to run your own comparisons.

Data provided are estimates based on annual shipment averages and represent a company's entire corporate structure, including subsidiaries. For shipments moving in containers, the beneficial owner is associated with the emission savings, not the send freight party. Data provided is also based on system averages (e.g. miles, tonnage, and fuel consumption). Actual emissions and savings may vary based on routing and other variable factors. Union Pacific's fuel consumption rate is applied to other carriers' miles for interline moves. Railroad routes and mileages are applied to the Comparative Truck Shipments. Estimates apply to one-way loaded shipments only.

Truck fuel efficiency based on EPA/NHTSA, Draft Regulatory Impact Analysis: Proposed Rulemaking to Establish Greenhouse Gas Emissions Standards and Fuel Efficiency Standards for Medium and Heavy-Duty Engines and Vehicles.

Emission Factors from the Climate Registry General Reporting Protocol C02e includes Carbon Dioxide (CO₂) or Carbon Dioxide Equivalent, Methane (CH₄), and Nitrous Oxide (N₂O). Greenhouse Gas equivalents are estimates based on Environmental Protection Agency calculations.

Attachment "A"