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July 31, 2026

Via Email:

To: Hon. Dawn Rowe, Chair
Hon. Joe Baca, Jr., Vice Chair
and Members of the Board of Supervisors
boardmeeetingcomments@cob.sbcounty.gov

RE: Request to Deny Appeal (Minor Use Permit and Mitigated Negative Declaration) – Maverik Project

Dear Honorable Dawn Rowe, Honorable Joe Baca, Jr., and Members of the Board of Supervisors:

On June 8, 2026, this honorable Board received a written request relating to an appeal (the "Appeal") of the Maverik project proposed on the southwest corner of Highway 138 and Oasis Road in Pinion Hills. This appeal requested that this honorable Board either (1) deny the Maverik project or (2) require an EIR process before further approval. We respectfully request that this Board proceed with the approval(s) necessary for the Maverik project pursuant to the approval decision made after review and analysis by the County's competent and qualified representatives entrusted with land use decisions.

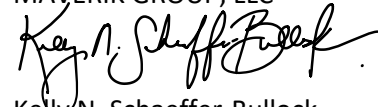
The Appeal correctly set forth the standard of review related to Negative Mitigated Declarations. However, in spite of the low threshold under the fair argument standard, the low threshold still has not been met. The most specific concerns identified in the Appeal are related to turning radii and "impacts on ingress/egress". However, the stated concerns are (i) inconsistent with the turning radii Maverik has submitted and City officials have reviewed, analyzed and evaluated, which positively demonstrates that there are no issues with turning radii, (ii) are unsupported by any observations, exhibits, or other facts or fact based assumptions, and (iii) do not fall under current CEQA regulations. Current CEQA regulations focus on Vehicle Miles Traveled ("VMT"), and leave the majority of traffic safety issues to the local municipalities. The same is also true of the Appeal's reference to "dangers to school children as also raised by the local school district." However, the school is .9 miles to the north of the Property, and there have been no fact based allegations that would meet the fair argument standard. Even if these particular concerns were covered under CEQA regulations, and though Maverik acknowledges the impressive resume of Mr. Hale, simply stating a concern without any support is still insufficient to meet the fair argument standard. This is particularly so when Maverik has exhibits prepared by competent and licensed

engineers that demonstrate there are no issues with the turning radii or ingress/egress, and the school is not only not immediately adjacent to the Property, but is almost a mile to the north. In fact, the Appeal spent more time on presenting resumes that presenting fact based support that the Maverik project may have *significant* impacts. The appeal simply states categories of concern.

Without any support for the categorical concerns alleged in the Appeal, Maverik respectfully requests that this Board deny the appeal and approve the Maverik project as submitted – without any additional investigation or amendment required.

Sincerely,

MAVERIK GROUP, LLC

A handwritten signature in black ink, appearing to read "Kelly N. Schaeffer-Bullock". The signature is fluid and cursive, with a large initial "K" and "S".

Kelly N. Schaeffer-Bullock
Senior Corporate Counsel

Cc (via email only): Thomas Bustamonte (thomas.bustamonte@lus.sbcounty.gov), David Mack (David.Mack@weareharris.com), and Delanie Garlick (Delanie.Garlick@weareharris.com)