

To: City of Santa Rosa Subdivision Committee

Re: Elm Tree Station project, 874 N Wright Road, Santa Rosa.

Dear City of Santa Rosa Subdivision Committee

I am writing to express my opposition to the Elm Tree Station Proposal at 874 N Wright Road, Santa Rosa, for many reasons including the following:

A gas station at this location is completely unnecessary. There are already several (10-14) gas stations within a couple of miles in every direction.

A lot has changed since the Conditional Use Permit approval, MND, and Final Design Review were approved in 2013. We are now much more conscious of the climate emergency. Sonoma County, the Cities of Petaluma, Sebastopol, Windsor and others have passed Climate Emergency Resolutions. Building new gas stations in 2019 makes no sense. A decision to approve a new gas station now would fly in the face of the stated goals of the Community Climate Action Plan to reduce local greenhouse gas emissions, and ensure long-term sustainability and resilience from climate change and its effects. It does nothing to reduce greenhouse gases or encourage residents to use public or alternative methods of transportation. It merely prolongs out-of-date infrastructure to support unsustainable lifestyles. Who will bear the costs of clean up when the gas station becomes obsolete?

The electric charging stations, bike racks etc. are a gesture in the right direction, but do not outweigh the negative impact of a new gas station. This is not a practical location for EV charging stations. Who will want to leave a car in this location to charge for at least an hour or two? EV charging stations need to be installed in places where people are already going to spend at least an hour or two: hotels, restaurants, movie theaters, etc.

Homeless encampments along the nearby Joe Rodota trail are a huge concern. Sales of liquor from a minimart in this area would only exacerbate problems. A friend who knows the area well wrote: "Any development on N. Wright will serve as a liquor distribution center for transients on the trail. I fear it will fuel their westward movement along the trail and encourage camping on Riccas Creek."

The Conditional Use Permit states (E.) that "Granting the permit would not constitute a nuisance or be injurious or detrimental to the public interest, health, safety, convenience, or welfare, or materially injurious to persons, property....in the vicinity..."

I believe that building a gas station would be injurious in terms of impacts to air and water quality as well as greenhouse gas emissions:

*Gasoline leaks happen at gas stations every day. As people fill up their gas tanks, gasoline drips from the nozzle onto the ground and vapors leak from the open gas tank into the air. Gasoline leaks can also happen in pipelines or in underground storage tanks where they can't be seen.*<sup>4</sup>

<https://www.eia.gov/energyexplained/gasoline/gasoline-and-the-environment.php>

This is an undeveloped site with wetlands and oak trees, within the area of critical habitat for the endangered California tiger salamander. Draining the ponds and paving over large parts of the

area with impervious surfaces will only have negative consequences on water quality on site and downstream. Underground storage tanks always end up leaking. Who will bear the costs of clean up when they do?

For all these reasons I urge you to reconsider this project.

Sincerely

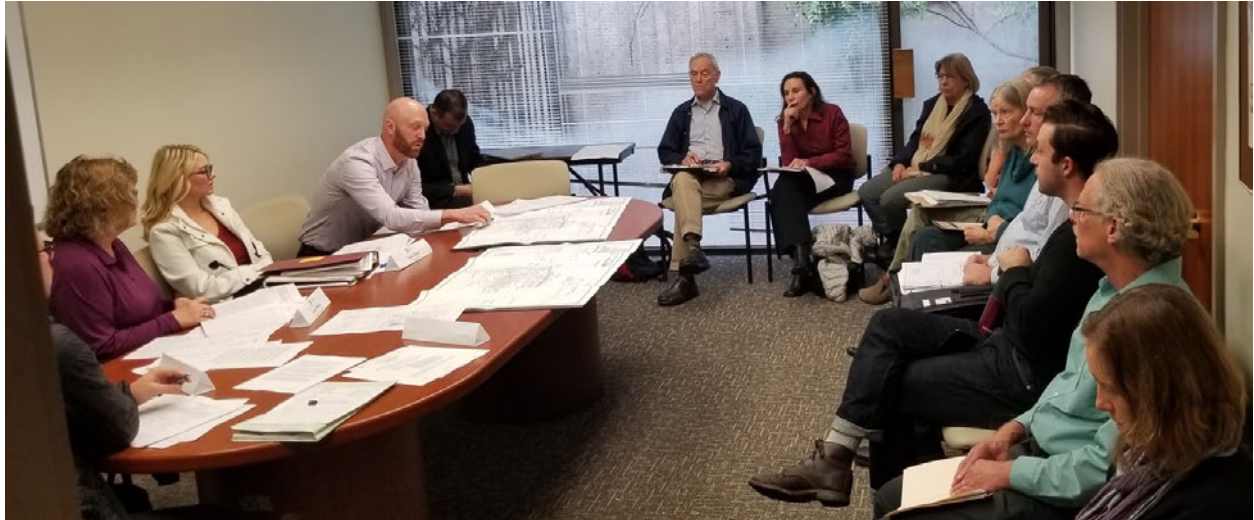
Jenny Blaker

A solid black horizontal bar used to redact the signature of Jenny Blaker.

## **CONGAS Record of December 12, 2019 Subdivision Subcommittee meeting** July 19, 2022

On December 12, 2019 the Subdivision Subcommittee of the Planning Commission of the City of Santa Rosa held a meeting where they voted to approve a parcel map waiver for the gas station proposal located at 874 North Wright Road in Santa Rosa.

Thirteen members of the Coalition Opposing New Gas Stations (CONGAS) attended the meeting. See photo below.



Thirteen members or supporters of CONGAS attend the December 12, 2019 Subdivision Subcommittee Mtg. In the image left to right on the side opposite the committee members are: Steve Birdlebough, June Brashares, Christine Hoex, Jenny Blaker, Debora Hammond, Miles Sarvis-Wilburn, Marcos Ramirez, Gig Hitao, Sunny Galbraith. Not pictured, taking the photo is Woody Hastings, and behind him are several other CONGAS members including Kevin Conway, Rich Sachen, and Laura Neish for whom there was no seat available in the small meeting room.

In casting their votes, we observed that none of the members of that committee stated any specific reason why the waiver should be granted. Several questions went unanswered such as why a parcel map waiver is needed at all in this case. Why not just produce a parcel map? Gas stations are by definition toxic sites. The public should be able to access maps that clearly indicate where on a property underground or above ground hazardous fuel is stored and where pipelines and dispensers will be located. Without this basic outline that indicates the subdivision which would be made clear in a parcel map, knowing where these facilities are located will be more difficult.

At the meeting, members of CONGAS made the following statements or posed the following questions:

A request that documentation of statutorily-required public noticing of the previous hearings and decision-making meetings regarding the 874 N. Wright Road proposal be shared with the public. Staff was unable to produce that documentation at the meeting. **We request that the waiver be denied at least until such time that documentation of compliance with public noticing requirements is shared with concerned citizens.**

The staff report appears to contain an error in the first paragraph where it states: “The Elm Tree Station (Project) involves a Waiver of Parcel Map and subsequent Certificate of Compliance to subdivide an approximately 1.12-acre parcel into two parcels sized .73 and 0.25 acres located at 375 Calistoga Road.” 375 Calistoga Road is located on the east side of Santa Rosa, miles from this project site at 874 N. Wright Road on the far west side of Santa Rosa.

In the staff report, attachment 2, Parcel Map Waiver map states that “*This subdivision is not within an area designated as a high fire severity zone.*” Given the dynamics and severity of urban-wildland interface wildfires over the past three years, including the 2017 Tubbs fire where the fire hopped the 101 freeway and spilled into the flats to the east of the freeway, **CONGAS asserted that this characterization is flawed and merits further consideration.**

In attachment 9 “Mitigated Negative Declaration for Elm Tree Station.” The 2013 MND is woefully outdated and should be considered obsolete. It does not include greenhouse gas emissions as an item on its checklist that is addressed. It is apparent on its face that expansion of fossil fuel infrastructure of any kind, which is the primary purpose of this project, contributes significantly to continued and expanded use of fossil fuels. Current science and state policy calls for rapid greenhouse gas reductions if we are to have any hope of safeguarding a livable global climate. **The MND should be nullified and a new environmental review should be initiated for this project.**

It is not clear that the applicant had fulfilled all of the conditions for approval for the Parcel Map Waiver at the time the Subdivision Committee granted the approval. In particular, there is no evidence that the applicant’s engineer has complied with all requirements of the current Municipal Separate Storm Sewer System and City Standard Urban Stormwater Mitigation Plan Low Impact Development Guidelines. **The parcel map waiver should be denied until such time that the applicant can demonstrate that they are in compliance with the guidelines.**