

**From:** [Brent Anderson](#)  
**To:** [PLANCOM - Planning Commission](#)  
**Subject:** [EXTERNAL] New Gas Station  
**Date:** Wednesday, April 9, 2025 6:28:27 PM

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Santa Rosa City Planning Commission,

I am opposed to the gas station proposal at 874 North Wright Road (intersection of Highway 12 and Fulton/Wright Rd.) in Santa Rosa. Don't we have enough future toxic waste FEMA sites in Sonoma County. If a new gas station is built in this or any location, I will make a point of never buying gas there.

Sincerely,

Brent E Anderson  
Windsor

**From:** [Jan Armenta](#)  
**To:** [PLANCOM - Planning Commission](#)  
**Subject:** [EXTERNAL] No Gas Station at Wright Road.  
**Date:** Wednesday, April 9, 2025 5:30:21 PM

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Please do not approve the gas station. We don't need a gas station at this location!!

Thank you,  
Jan Armenta

Sent from my iPhone

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**FW: [EXTERNAL] No New Gas Station!**

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**From** Jones, Jessica <jjones@srcity.org>

**Date** Wed 4/9/2025 3:08 PM

**To** McKay, Conor <CTMcKay@srcity.org>

Jessica Jones | Deputy Director - Planning

Planning and Economic Development Department | 100 Santa Rosa Avenue, Room 3 | Santa Rosa, CA 95404

Tel. (707) 543-3253 | Mobile (707) 292-0963 | jjones@srcity.org

Coming March 2025, the Planning, Building, and Engineering Divisions of the City of Santa Rosa's Planning and Economic Development Department will fully transition to an online application submittal process through the Accela Citizen Access platform. Learn more about the Online Permitting System [here](#), and more information will be coming soon!

-----Original Message-----

From: James Freed <jamesfreed.design@me.com>

Sent: Wednesday, April 9, 2025 3:04 PM

To: \_PLANCOM - Planning Commission <planningcommission@srcity.org>

Subject: [EXTERNAL] No New Gas Station!

Dear Planning Commissioners,

I'm writing in opposition to the new gas station proposal at 874 North Wright Road (intersection of Highway 12 and Fulton/Wright Rd.) in Santa Rosa. The last thing Sonoma County needs now is new fossil fuel infrastructure. We should be preparing for the electrification of major modes of transportation, not bending to the will of the fossil fuel industry. Please refrain from granting your permission to this backward looking and unnecessary blight on the urban landscape.

Sincerely,

James Freed  
Sebastopol, CA

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**FW: [EXTERNAL] Gas station proposal at 874 North Wright Road**

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**From** Jones, Jessica <jjones@srcity.org>

**Date** Wed 4/9/2025 4:12 PM

**To** McKay, Conor <CTMcKay@srcity.org>

Jessica Jones | Deputy Director - Planning

Planning and Economic Development Department | 100 Santa Rosa Avenue, Room 3 | Santa Rosa, CA 95404

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-----Original Message-----

From: Lucy Kenyon <lucyk@sonic.net>

Sent: Wednesday, April 9, 2025 4:06 PM

To: \_PLANCOM - Planning Commission <planningcommission@srcity.org>

Subject: [EXTERNAL] Gas station proposal at 874 North Wright Road

I'm writing to let the Planning Commission know I'm opposed to the gas station proposed for 874 North Wright Road.

Thanks,

Lucy Kenyon



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**FW: [EXTERNAL] 4-9-25 Please no more gas stations here**

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**From** Jones, Jessica <jjones@srcity.org>

**Date** Wed 4/9/2025 2:49 PM

**To** McKay, Conor <CTMcKay@srcity.org>

**Jessica Jones | Deputy Director - Planning**

Planning and Economic Development Department | 100 Santa Rosa Avenue, Room 3 | Santa Rosa, CA 95404  
Tel. (707) 543-3253 | Mobile (707) 292-0963 | [jjones@srcity.org](mailto:jjones@srcity.org)



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**From:** Janet Lorraine Paul <jlorraine@sonic.net>

**Sent:** Wednesday, April 9, 2025 2:49 PM

**To:** \_PLANCOM - Planning Commission <planningcommission@srcity.org>

**Subject:** [EXTERNAL] 4-9-25 Please no more gas stations here

4-9-25 Please no more gas stations here. Not needed. Not wanted.

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Janet Lorraine Paul

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**FW: [EXTERNAL] No new gas stations**

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**From** Jones, Jessica <jjones@srcity.org>

**Date** Wed 4/9/2025 4:11 PM

**To** McKay, Conor <CTMcKay@srcity.org>

Jessica Jones | Deputy Director - Planning  
Planning and Economic Development Department | 100 Santa Rosa Avenue, Room 3 | Santa Rosa, CA 95404  
Tel. (707) 543-3253 | Mobile (707) 292-0963 | jjones@srcity.org

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-----Original Message-----

From: Amy Lyman <alyman48@gmail.com>

Sent: Wednesday, April 9, 2025 3:10 PM

To: \_PLANCOM - Planning Commission <planningcommission@srcity.org>

Subject: [EXTERNAL] No new gas stations

Dear Planning Commissioners,

With all of the chaos occurring in the country right now with the proposed or actual rollback of environmental protections, and the proposed increased use of coal and gas requiring mining and drilling that will add significantly to the environmental damage facing our world, we need to stand strong and protect the earth, our state and our communities.

We do NOT need a gas station at 874 N. Wright Rd. There are already 10 gas stations within a 5 mile radius. We need to keep moving forward with environmental protections and with the highest consideration for the health of community members, especially the elderly, young children and those with health issues affected by air pollution and toxic materials.

Please vote NO on the proposed gas station on N. Wright Rd.

Thank you

Amy Lyman

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**FW: [EXTERNAL] NO NEW GAS STATION @ 874 N. Wright Road!**

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**From** Jones, Jessica <jjones@srcity.org>

**Date** Wed 4/9/2025 3:08 PM

**To** McKay, Conor <CTMcKay@srcity.org>

**Jessica Jones | Deputy Director - Planning**

Planning and Economic Development Department | 100 Santa Rosa Avenue, Room 3 | Santa Rosa, CA 95404  
Tel. (707) 543-3253 | Mobile (707) 292-0963 | [jjones@srcity.org](mailto:jjones@srcity.org)



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**From:** Wendy Millstine <wendyomatik@gmail.com>

**Sent:** Wednesday, April 9, 2025 2:49 PM

**To:** \_PLANCOM - Planning Commission <planningcommission@srcity.org>

**Subject:** [EXTERNAL] NO NEW GAS STATION @ 874 N. Wright Road!

Dear Santa Rosa Planning Commission,

I'm a resident and homeowner at Sequoia Gardens Mobile Home Park on Fulton Road in Santa Rosa. I'm writing to express my strong opposition to any New Gas Stations in Sonoma County ever. And here's why:

- Extensive scientific research shows that toxic pollution threatens public health and safety
- The location is a greenfield with seasonal wetlands
- The site is adjacent to a propane vehicle fueling station
- It is against city rules to build two fueling stations within 500 feet of each other
- It's not needed: there are already 10 gas stations in a 5-mile radius
- There will be increased traffic congestion, noise, idling cars adjacent to the Joe Rodota Trail
- Will worsen the climate crisis as wildfire, drought, flood and other extreme weather events buffet our community.

Please support the permanent banning of new gas stations in Sonoma County. Thank you for your consideration.

Sincerely,  
Wendy Millstine  
Santa Rosa, CA



Dear Santa Rosa Planning Commissioners,

I am writing to oppose the proposed gas station at 874 North Wright Road. I'm very concerned about the risk of toxic pollution next to environmentally sensitive Laguna.

According to an [analysis by Projection Hub](#), the annual average revenue for a sole proprietorship gas station was over \$1.3 million based on tax return data. Their analysis also found that net profit margins on fuel sales are generally only about 1%.

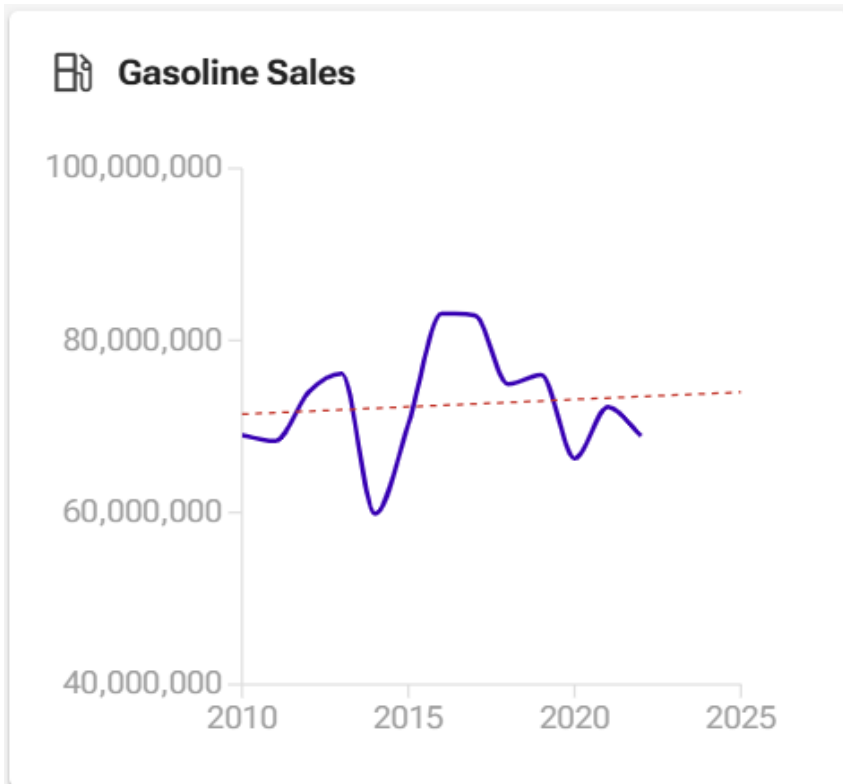
Meanwhile, [The Hustle](#) reports that convenience store sales only account for about 30% of a gas station's revenue, but often account for 70% of total profits.

Maybe what is needed is a convenience store at this location. Just don't allow this gas station which is next to another fueling station which is not allowed under the zoning regulations.

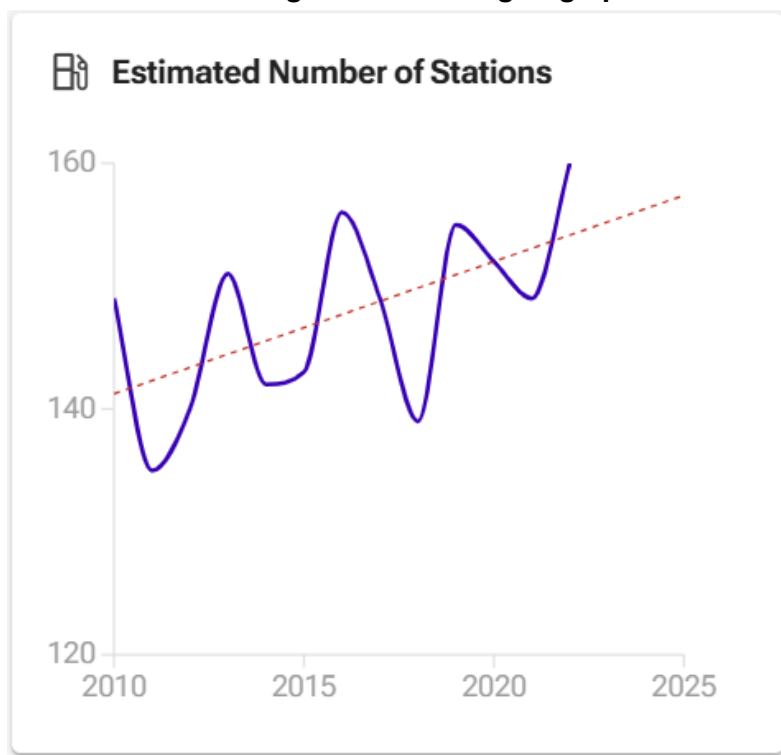
### Gas Station is Not Needed

There are already enough gas stations near the proposed project. According to information reported on [CityClimateDashboard.org](#) compiled from publicly accessible data sources, the following trends are showing:

**Gasoline sales** in Santa Rosa are **declining** from a high in 2016.

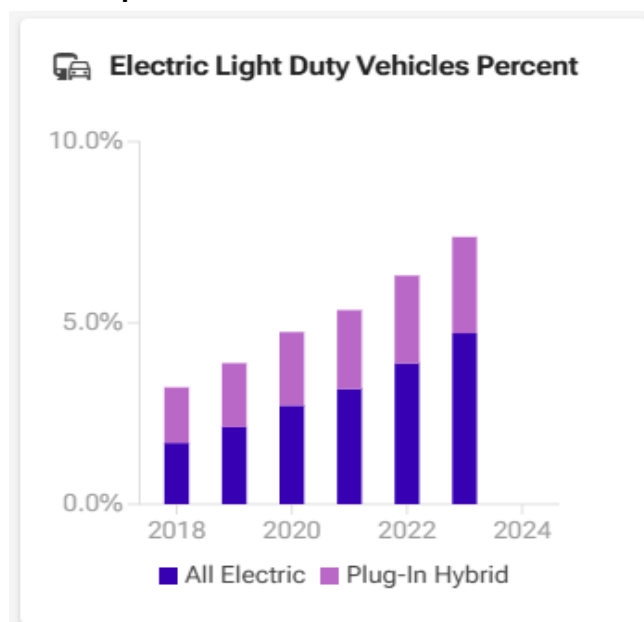


While the **number of gas stations is going up** in Sonoma County



One of the main markets for gas from this station would be vehicles registered in the 95472 zip code. But the 95472 zip code has the highest percent of electric cars in the county. Over the last two years alone over 2,000 new plug in vehicles were sold each year in the 9572 zip code.

#### 95472 Zip Code



The planning commission should not subject the citizens to the environmental risk of this new gas station when it is clearly not needed now and especially into the future.

Thank You,  
Steven Pierce  
Sebastopol

Sincerely,  
Jeff Rooney  
Santa Rosa



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[EXTERNAL] Gas Station Proposal at 874 N Wright Rd - Letter of OPPOSITION from Sonoma County Healthcare Professionals

---

From Barbara Sattler <bsattler@usfca.edu>

Date Wed 4/9/2025 12:02 PM

To \_PLANCOM - Planning Commission <planningcommission@srcity.org>

Cc McKay, Conor <CTMcKay@srcity.org>; Osburn, Gabe <GOsburn@srcity.org>; Stapp, Mark <MStapp@srcity.org>; Rogers, Natalie <NRogers@srcity.org>; Pardo, Aaron <APardo@srcity.org>

 2 attachments (285 KB)

Health Risk Lit. post 2022 - gas stations.pdf; Healthcare Professionals Letter - SR Planning Commission.pdf;

Dear Santa Rosa Planning Commissioners,

On behalf of the undersigned healthcare professionals based in Sonoma County, I submit this letter of opposition (**See Attachment**) to the gas station proposal at 874 North Wright Road in Santa Rosa. Please let me know if you have any difficulty accessing the letter and/or if you have any questions. Thank you.

Respectfully,

Barbara Sattler, RN, DrPH, FAAN

Professor Emeritus

School of Nursing and Health Professions

University of San Francisco

Barbara Sattler, RN, DrPH, FAAN

Professor Emeritus

School of Nursing and Health Professions

University of San Francisco

[bsattler@usfca.edu](mailto:bsattler@usfca.edu)

O: (415) 422-6101

C: (410) 371-6965

Leadership Council

[California Nurses for Environmental Health and Justice](#)

Member

[Alliance of Nurses for Healthy Environments](#)

"The best way to predict the future is to design it."





- 1) A 2022 study by Allahabady et al showed that the average benzene concentration in the air at the fuel stations was about 5.5 times the standard limit.

Ahmad Allahabady<sup>1</sup> ID , Zabihollah Yousefi<sup>2</sup> ID , Reza Ali Mohammadpour Tahamtan<sup>3</sup> ID , Zohre Payandeh Sharif. Measurement of BTEX (benzene, toluene, ethylbenzene and xylene) concentration at gas stations Ahmad Allahabady<sup>1</sup> ID , Zabihollah Yousefi<sup>2\*</sup> ID , Reza Ali Mohammadpour Tahamtan<sup>3</sup> ID , Zohre Payandeh Sharif

- 2) Benzene, toluene, ethylbenzene, and xylenes (BTEX) showed the highest concentrations ranging from 2 to 15 µg/m<sup>3</sup>, ten times higher than those in the community air.

Jia, C., Fu, X., Chauhan, B. *et al.* Exposure to volatile organic compounds (VOCs) at gas stations: a probabilistic analysis. *Air Qual Atmos Health* **15**, 465–477 (2022).  
<https://doi.org/10.1007/s11869-021-01124-5>

- 3) The health of gas station workers is affected by exposure to BTEX and gasoline vapor emissions. According to the result of this study, BTEX compounds cause genotoxic changes, chromosomal and genetic abnormalities. (This can result in a number of cancers, birth defects, and other health risks)
- 4) Overall, residence within close proximity to a petrol station, especially one with more intense refueling activity, was associated with an increased risk of childhood leukemia,

Malavolti, M., Malagoli, C., Filippini, T. *et al.* Residential proximity to petrol stations and risk of childhood leukemia. *Eur J Epidemiol* **38**, 771–782 (2023).  
<https://doi.org/10.1007/s10654-023-01009-0>

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5) Iskandar Muda, Mohammad Javad Mohammadi, Arefeh Sepahvad, Ali Farhadi, Rasha Fadhel Obaid, Masoume Taherian, Najeh Alali, Shakhawat Chowdhury, Majid Farhadi. Associated health risk assessment assessment due to exposure of BTEX compounds in fuel station workers. **Reviews on Environmental Health**, March 2023

- 6) [Here](#) is a 2023 article from the Government of Canada that expands the range of possible harmful exposures to benzene from the 160 meters we had cited previously to 300 meters. This is probably the most useful new publication I found for the health professionals' letter.

April 8, 2025

Santa Rosa Planning Commission  
City Hall, 100 Santa Rosa Ave, Santa Rosa, CA, 95404  
Via email: [planningcommission@srcity.org](mailto:planningcommission@srcity.org)

**Subject: 874 North Wright Road Gas Station (File # PRJ21-033)**

Dear Commissioners:

I am a life-long resident of Sonoma County, an environmentalist (Sierra Club Redwood Chapter, Sonoma County Conservation Action, Climate Action Healdsburg, etc.) and retired attorney.

**Conditional Use Permit.** The CUP should be denied. The fossil fuel component of the Project clashes with urgent fossil reduction and climate action policies recently enacted by Santa Rosa, and strongly reinforced at the state level. The Project's inconsistency with current policy is striking. An all-electric charging project would be consistent – and welcome. Reviving a 2013 gas station project is not. Moreover, additional fossil fuel access is unnecessary at this location, because 10 gas stations are within a five-mile radius.

As Commissioners, you are given broad discretion to apply Santa Rosa's general climate policies to deny a CUP when a project is:

“injurious or detrimental to the public interest, or health, or safety ...”

**Santa Rosa Instructions for Conditional Use Permit Applications**

The Project's fossil fuel component is not in the public's interest, health and safety, which are already being undermined by climate change. Sonoma County is experiencing climate change and damage with wildfire, flood, record-breaking temperatures and economic losses (agriculture, tourism). More and worse disasters are in the future unless decisive and enduring climate actions are taken. For this to work, large and small actions by many are required, worldwide.

I hope will you stand with consensus science and the local and state public policies that protect the public interest, welfare and safety. Enforce the laws combating climate change.

**Trump Executive Order and local laws.** On Monday, April 6, 2025, Trump issued an order, titled "[Protecting American Energy from State Overreach](#)". It directs the attorney general to identify state laws that get in the way of the use of domestic energy. The directive specifically notes that laws addressing climate change, environmental justice, greenhouse gas or carbon emissions should be prioritized by the attorney general. California is a specific target.

“The Attorney General, in consultation with the heads of appropriate executive departments and agencies, shall *identify all State and local laws, regulations, causes of*

action, policies, and practices (collectively, State laws) burdening the identification, development, siting, production, or use of domestic energy resources ..." (Italics added)

My reason for bringing up the Trump Executive Order? Obviously, the Order is about future actions, and is not applicable to the current Project. But it illustrates the stakes for making progress on climate change. Commissioners, I hope that this Trump Order will reinforce your commitment to the value and power of local laws, and the importance of standing for small and large actions in the public interest.

**Addendum.** The Addendum is incomplete in its Alternative analysis.

Finding, Section 3 says the Project has the same number of gas pumps (6) and electric chargers (4), in type and intensity of land use, as analyzed in the MND, thus the Project does not constitute a substantial change that would require major revisions of the previously certified MND due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects.

Addendum, pages 38, 42, notes the Project has the capacity to expand its electric charging stations, which could reduce future GHGs.

Firstly, the "type" and "intensity" of use is NOT the same: gas pumps produce GHGs, electric chargers do not.

Secondly, the Addendum does NOT analyze an obvious alternative: make ALL the car service units into electric charging stations. That mitigation would effectively eliminate the Project's GHG emissions that are of concern under local and state climate policy.

In conclusion, the Addendum is inadequate in its Alternatives analysis, and a Supplemental MND should be prepared that addresses a fossil free alternative to gas pumps.

Thank you for considering my comments.

Sincerely,

Janis Watkins

Santa Rosa Planning Commission  
100 Santa Rosa Ave,  
Santa Rosa, CA 95404  
Via email: [planningcommission@srcity.org](mailto:planningcommission@srcity.org)

April 9, 2025

**Subject: Gas station proposal at 874 North Wright Road, and gas stations in general –  
A Healthcare Professionals' Perspective**

Dear Santa Rosa Planning Commissioners:

We, the undersigned local healthcare professionals, write to express our dismay that the City of Santa Rosa is entertaining the notion of permitting a new gas station at 874 North Wright Road, just within Santa Rosa city limits.

As healthcare professionals committed to safeguarding public health, we are writing to express our deep concerns regarding the negative health impacts associated with gasoline stations in general, and this particular proposal, specifically.

There are several highly toxic chemicals in gasoline. These harmful compounds, which can escape into the air, include: benzene, toluene, ethyl benzene, and xylene (BTEX). Of these, benzene is the gasoline constituent most harmful to human health. Adverse health effects of benzene include cancer (including leukemia), anemia, increased susceptibility to infections, and low birthweight babies. When babies are born at low birthweight they have higher risks for a range of complications.

In addition to exposure via air, there is the potential for groundwater contamination from leaking underground storage tanks and dispensing operations. According to the California State Water Resources Control Board, in Nov 2024, there were 37,749 leaking storage tanks in California. The hazards posed by these leaking vessels can contaminate drinking water supplies and disproportionately impact vulnerable populations, including children, the elderly, and individuals with respiratory conditions. Wright Charter Elementary School is just 2700 feet away from the site.

Residents and workers near gasoline stations are at a higher risk of inhaling these harmful vapors, particularly when fuel is being transferred or dispensed. Additionally, particulate matter<sup>1</sup> and volatile organic compounds<sup>2</sup> released from gasoline stations contribute to air pollution, exacerbating respiratory diseases such as asthma and chronic obstructive pulmonary disease.

Underground fuel storage tanks pose a significant risk of soil and groundwater contamination due to potential leaks and spills. The risks are real. Contaminated groundwater can impact local drinking water sources, leading to long-term negative health effects in the community. The environmental burden of such contamination, including remediation, is extremely costly and difficult to accomplish. The location of the proposed gas station is near a residential community where many residents rely on wells for their drinking water. These would be threatened by leaking underground storage tanks.

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<sup>1</sup> <https://www.epa.gov/pm-pollution/particulate-matter-pm-basics#>

<sup>2</sup> <https://www.epa.gov/indoor-air-quality-iaq/what-are-volatile-organic-compounds-vocs#>

It has come to our attention that the environmental review upon which your decision will be based was completed in 2013 – twelve years ago. Much has been learned over the past twelve years about the human health impacts of exposure to gasoline and diesel. Instead of calling for a new environmental preview, we call on you to simply reject the proposal. California is on a transition away from using dangerous fossil fuels toward much cleaner and safer electrification. Approving a new gas station in 2025 is an unhealthy deviation from this positive path to healthier forms of transportation. We believe that the people of Santa Rosa are as committed to climate healthy choices as we are and given the concerns noted above, we urge the Commission to deny the Conditional Use Permit for the gas station at 874 North Wright Road.

Thank you for your attention and scrutiny on this proposal. We hope that you will make a decision based on the public's health.

Sincerely,

Barbara Sattler, RN, DrPH, FAAN, Professor Emeritus, School of Nursing and Health Professionals, University of San Francisco

Gary Pace, MD, MPH, Local Family Physician

Kenna Lee, RN, PHN, MAS, Public Health Practitioner

David Schneider, MD, Family Physician and Medical Educator

Panna Lossy MD, Local Family Physician

Jenny Fish, MD, HMDC, Local Family Physician

Cynthia Dickinson, RN, retired Nurse Practitioner and member, HPEACE

Ariel Muirhead, RDN, Public Health Registered Dietitian (RDN).

Jacob Wilbur, MDiv, Hospice Chaplain

Mary Wyman, Family Nurse Practitioner and Public Health Nurse

Margaretha D. Fledderus, RN, MSN, retired FNP, Oncology CNS.

Kendall Jones, MD, Local Family Physician

Ember Keighley, MD, MPH

Wendy Kohatsu, MD, ABOIM, Assoc. Clinical Professor, Family & Community Medicine, UCSF

Danny Toub, MD, AAHIVS, Local Family Physician

Jessica Stanton MD, local family physician

Morgan Theis, MD, local family physician

Deirdre Bernard-Pearl MD, local Pediatrician

Note: all of the above-signed individuals are residents of Sonoma County

cc:

- Conor McKay, Senior Planner
- Gabe Osburn, Director of Planning & Economic Development
- Mark Stapp, Mayor, City of Santa Rosa
- Natalie Rogers, Santa Rosa Councilmember, District 7
- Aaron Pardo, Planning Commissioner, District 7



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**FW: [EXTERNAL] Public Comment: Agenda item 11.1: OPPOSE Conditional Use Permit**

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**From** Jones, Jessica <jjones@srcity.org>  
**Date** Wed 4/9/2025 9:49 AM  
**To** McKay, Conor <CTMcKay@srcity.org>

**Jessica Jones | Deputy Director - Planning**

Planning and Economic Development Department | 100 Santa Rosa Avenue, Room 3 | Santa Rosa, CA 95404  
Tel. (707) 543-3253 | Mobile (707) 292-0963 | [jjones@srcity.org](mailto:jjones@srcity.org)



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**From:** Eris Weaver <eris@bikesonoma.org>  
**Sent:** Tuesday, April 8, 2025 11:53 AM  
**To:** \_PLANCOM - Planning Commission <planningcommission@srcity.org>  
**Subject:** [EXTERNAL] Public Comment: Agenda item 11.1: OPPOSE Conditional Use Permit

Dear Commissioners:

On behalf of the Sonoma County Bicycle Coalition, I'm adding our voices to the groundswell of opposition to the proposed gas station on Wright Road.

- As other commenters have already stated,
  - The City has already passed a ban on new gas stations.
  - The City has declared a Climate Emergency and enacted a Climate Plan.
  - The City and the State are moving away from fossil fuels toward more sustainable transportation options.
- That intersection is already problematic for cyclists, and adding more vehicles entering and exiting the station right will only make Wright Road more dangerous. Even with the path being re-routed around the development and away from the driveway, JRT users will still have to travel on the sidewalk and cross Wright Road.
- I don't doubt that a market would be useful for neighborhood residents, but I find the applicant's claim that the attached small park will become "a destination for cyclists" somewhat specious. Who goes out of their way to visit a park next to a gas station?

I urge you to vote no on this proposal.



Eris Weaver, Executive Director  
Sonoma County Bicycle Coalition  
[eris@bikesonoma.org](mailto:eris@bikesonoma.org)  
707-545-0153 office • 707-338-8589 cell  
[www.bikesonoma.org](http://www.bikesonoma.org)

[Book time to meet with me](#)



[Find out how to](#)  
**WIN THIS EBIKE!**

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**FW: [EXTERNAL] 874 North Wright Road Gas Station Proposal – Risk of Contamination to residential water wells – OPPOSE –**

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**From** Jones, Jessica <jjones@srcity.org>

**Date** Wed 4/9/2025 5:04 PM

**To** McKay, Conor <CTMcKay@srcity.org>

**Jessica Jones | Deputy Director - Planning**

Planning and Economic Development Department | 100 Santa Rosa Avenue, Room 3 | Santa Rosa, CA 95404  
Tel. (707) 543-3253 | Mobile (707) 292-0963 | [jjones@srcity.org](mailto:jjones@srcity.org)



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**From:** Jacob Wilbur <jacob.12@live.com>

**Sent:** Wednesday, April 9, 2025 4:59 PM

**To:** \_PLANCOM - Planning Commission <planningcommission@srcity.org>

**Cc:** Ariel Muirhead <arielmmuirhead@gmail.com>

**Subject:** [EXTERNAL] 874 North Wright Road Gas Station Proposal – Risk of Contamination to residential water wells – OPPOSE –

Dear Planning Commission Members,

We are concerned Santa Rosa residents. We heard about the plan for the gas station going in at 874 North Wright Road. We recently bought our first home off Chico Ave. We discovered our well is only 40 feet deep and most people in our area have shallow wells. Our neighbor informed us that everyone on our street is required to have city sewer service because of our shallow wells. Septic tanks were contaminating our water. We are concerned about this plan for a gas station right around the corner from us. We are afraid that the runoff and, if there are any leaks, that it would start to contaminate our drinking water. We hope the city takes into consideration our drinking water and our neighbors drinking water before they build the gas station on South Wright.

Here are some things we learned recently about how gasoline contaminates water:

A 10-gallon spill of petroleum [can contaminate 12,000,000 gallons of groundwater](#). Spills can occur because of leaks from underground storage tanks, piping connecting tanks to dispensers, and from dispensers themselves. Spills of small amounts of gasoline, which can pass through concrete pads

around dispensers happen routinely when drivers are filling their tanks and when tanker trucks are refilling underground storage tanks.

The cumulative effect of small gasoline leaks is enough to cause concern about gas stations anywhere. But we live in earthquake country. If an underground tank, fuel dispenser, or pipe ruptures and releases gasoline in an earthquake, the environmental impact could be catastrophic. Additionally, major floods can cause erosion that can displace underground tanks, which can then break free of the piping connecting them to fuel dispensers.

When this matter comes before you, please take the health and well-being of the local residential community into consideration and reject the proposal.

Sincerely,

Jacob Wilbur (he, him, his)

Ariel Muirhead (she/her)

**From:** [Woody Hastings](#)  
**To:** [PLANCOM - Planning Commission](#)  
**Subject:** [EXTERNAL] CONGAS Comment on the the gas station proposal at 874 N. Wright Rd. - Planning Commission meeting item 11.1 4/10/25  
**Date:** Wednesday, April 9, 2025 4:34:56 PM  
**Attachments:** [CONGAS Coalition Letter to SR Planning Commission 4-9-25.pdf](#)

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Dear Commissioners,

Please see attached a letter from the Coalition Opposing New Gas Stations (CONGAS), with the November 8, 2024 letter from CONGAS included.

Please let us know if you have any difficulty opening the attachment or any questions.

Thank you for your consideration.

-Woody Hastings  
On behalf of CONGAS  
310-968-2757



Santa Rosa Planning Commission  
City Hall, 100 Santa Rosa Ave,  
Santa Rosa, CA, 95404  
Via email: [planningcommission@srcity.org](mailto:planningcommission@srcity.org)

**Subject:** Agenda Item 11.1 – Public Hearing – Gas Station Proposal – Conditional Use Permit and Addendum to the Mitigated Negative Declaration – 874 N Wright Rd (PRJ21-033)

April 9, 2025

Dear Chair Weeks and Commissioners,

On behalf of the Coalition Opposing New Gas Stations, we write to express our concerns about the gas station proposal at 874 North Wright Road and provide reasons why the Commission must deny the Addendum to the Mitigated Negative Declaration (MND) and the Conditional Use Permit (CUP).

We highlight several assertions, as outlined below, any one of which constitutes a finding that the CUP and Addendum to the MND must be denied.

## 1. Mitigated Negative Declaration and Addendum

- a. The MND addresses light and glare on neighboring properties but does not mention risks of fire and explosion. *“One of the foremost environmental concerns associated with gas station lighting is the potential for explosions. Gasoline vapors are highly flammable, and any spark or ignition source in the vicinity can lead to a catastrophic explosion...Gas station lighting also presents fire hazards that can endanger both property and lives.”*  
<https://www.ledcostsaver.com/concerns-regarding-safety-in-gas-station-lighting/> (March 21, 2024).
- b. The Addendum to the MND, 3. Air Quality (p.19 of 47) states that *“The BAAQMD 2010 thresholds of significance, which were the applicable Air Quality CEQA Guidelines at the time, indicated that projects which generate fewer than 2,000 vehicle trips per day were not considered major air pollutant contributors and did not require a technical air quality study. A July 26, 2013, Traffic Impact Study prepared by W-Trans determined that the Project would generate 1,506 vehicle trips per day. Hence, no technical air quality report was prepared.”* Attachment 9, the Health Risk Assessment Memo, Feb.27, 2023, p.9, uses the figure of 1,506 (*“Daily traffic generation was calculated as 1,506 primary trips per day based on the Project’s traffic analysis.”*)

However, Attachment 7, the March 7, 2024 W-Trans Memo *Updated Trip Generation and Trip Length Information for Elm Tree Station* has “reevaluated the proposed project’s anticipated trip generation based on current rates....” These rates are not site-specific but use “standard rates published by the Institute of Transportation Engineers (ITE) in Trip Generation Manual, 11th Edition, 2021, for Convenience Store/Gas Station – 9-15 VFP (LU #945), and Multifamily House (Low-Rise) Not Close to Rail Transit (LU #220) as these descriptions most closely match the proposed project.” This **leads to an assumed 2,459 trips per day**, a large increase on the 1,506 trips upon which the Addendum to the 2013 MND is based.

Attachment 10, the March 6, 2024 GHG Memo estimates 2,546 daily trips. The 2024 Trip Generation Memo and GHG Memo are estimating an increase of approximately 1,000 additional daily trips. **The implications – the new and significant effects – of the approximately 1,000 additional daily trips for traffic congestion on already congested roads, and on air quality, have not been addressed** in the Addendum to the MND.

- c. Traffic safety: The collision history for the 2013 Traffic Impact Study was based on records from the California Highway Patrol from July 2006 through July 2011. Those figures have not been updated in the subsequent Addenda. The Third Addendum to the Traffic Impact Study, October 16, 2023, states “there were no specific safety concerns related to the project.” However, there have been collisions including fatalities in this area since October 2023, including:
  - Two drivers sustained major injuries in a head-on collision in Fulton near Santa Rosa in Sonoma County on January 29, 2025.
  - A traffic collision involving injuries occurred at CA-12 Eastbound near N Wright Rd in Santa Rosa on November 10, 2024.

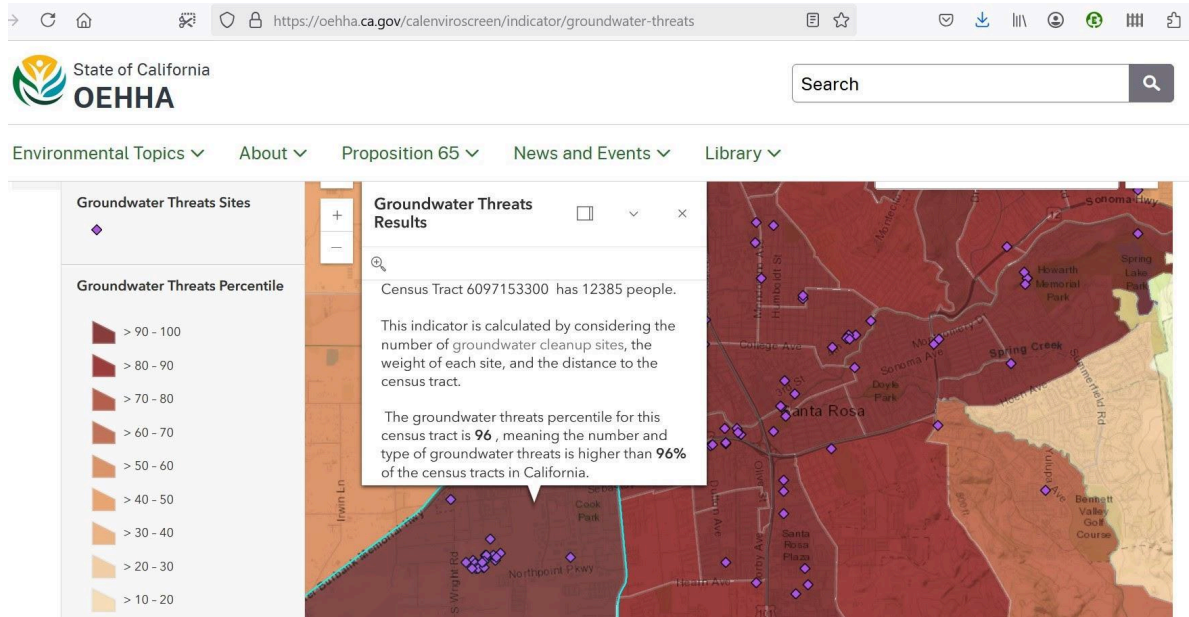
- A multi-vehicle collision on state Highway 12 in southwest Santa Rosa, Fulton, was reported Aug 29, 2024, with one person killed and seven injured.

Local Traffic Accident Reports published November 10, 2024, states: *"High-traffic routes like CA-12 are prone to accidents due to heavy vehicle volumes, high speeds, and frequent intersections. **Incidents near major roads like N Wright Rd can add complexity, making defensive driving crucial in such areas.**"*

<https://localaccidentreports.com/santa-rosa-ca-accident-on-ca-12-eastbound-at-n-wright-rd-results-in-injuries/>

- d. Hazards: The gas station proposal would involve installing **Underground Storage Tanks (UST)**. In the years since 2013, new information about extensive problems of leaking USTs and risks of substantial importance shows the project will have significant effects that were not discussed in the previous MND. [EPA estimates](#) that about 225,000 brownfield sites in the United States are contaminated by petroleum, largely from leaking USTs at gas stations. (July 2020). Incidents in 2024, such as a [Chevron Station](#) gas leak that caused a major evacuation and contamination clean up issue, a [petroleum spill](#) at a truck stop and a significant [gasoline leak/explosion](#) underscore the risk and impact of underground storage tanks (UST) that leak. There are multiple causes of leaks including risks from human error, natural disasters and earthquakes. Santa Rosa is in an area with significant [earthquake faults](#). The California Water Boards state that following a substantial earthquake, a ["damaged or improperly operating UST system can pose a significant risk to human health, safety and the environment"](#). USTs create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. This was not addressed in the Addendum to the MND.
- e. In the Addendum, regarding hazardous impacts, it states (page 24) *"A Phase 1 Environmental Site Assessment was prepared by Environmental Geology Services, Inc. dated July 15, 2015. The report concluded that there were no environmental hazards or hazardous conditions found on or near the subject property."* The [map from the California Office of Environmental Health Hazard Assessment \(OEHHA\)](#) below shows there are many nearby contaminated areas, with each purple diamond indicating a site where there's been a Leaking Underground Storage Tank (LUST). The map below shows the area of Santa Rosa including the Wright Rd site. It shows a purple diamond LUST at 885 Wright Rd. right across the street from the proposed project site and a cluster at the Naval Auxiliary Air Station within a mile to the south.





- f. The Addendum, in its consideration of Hazards and Water Quality, failed to address the groundwater threat. The [map from the California Office of Environmental Health Hazard Assessment \(OEHHa\)](https://oehha.ca.gov/calenviroscreen/indicator/groundwater-threats) above shows LUST clean-up sites and also the overall Groundwater Threat Percentile by census tract. Note that according to the [CalEnviroScreen 4.0 Groundwater Threats Map](https://oehha.ca.gov/calenviroscreen/indicator/groundwater-threats) on which this is based, at the location of the proposed project the groundwater threats percentile for the census tract is **96**, meaning the number and type of groundwater threats is higher than **96%** of the census tracts in California. This map is based on data that was downloaded and analyzed in Summer 2021. This is new information of substantial importance that was not known and was not discussed in the 2013 MND. Adding a gas station would certainly add to the groundwater threat of this already highly impacted area. The Addendum did not assess the groundwater threat nor the cumulative impacts posed by the proposed gas station. See: <https://oehha.ca.gov/calenviroscreen/indicator/groundwater-threats>
- g. Cumulative impacts: Although the Blue Star Gas propane facility on the adjacent property is mentioned, potential cumulative impacts to air quality from the proximity of two facilities involving transportation, toxic emissions, handling and storage of flammable materials, and the resultant risk of fires and explosions, has not been addressed. Both gasoline and propane are flammable and can explode. The proximity of these two facilities would compound the risk, as well as increase the potential for air and water quality impacts.

## 2. Conditional Use Permit.

Santa Rosa's Instructions for Conditional Use Permit (CUP) applications state that "the [Planning Commission] may approve a CUP only after first finding that granting the CUP would not constitute a nuisance or be injurious or detrimental to the public interest, or health, or safety, or convenience, or welfare, or materially injurious to persons, property, or improvements in the vicinity and zoning district in which the property is located." We underline "or" in the sentence above to emphasize that the Commission must deny the CUP if it is the opinion of the Commission that any one of the standards is not met. The findings

regarding the MND do not supersede the independent judgement of the Commissioners regarding a denial of the CUP. A finding of detriment to public interest is solely the judgment of each Commissioner.

Ample evidence of detriment to public interest has been presented by members of the public. This includes:

- The economic burden on taxpayers (local government budgets) of cleaning up a toxic site after it eventually closes or the company goes bankrupt. For example, taxpayers spent more than \$21 million decontaminating gas stations after the Kiel Bros. Oil Co. went bankrupt, the [Associated Press reported in 2018](#).
- Risk of contamination to surface and groundwater including to drinking water wells;
- Health impacts from degraded air quality in the surrounding community due to regular venting of air toxics including benzene, a compound for which there is no known safe level of exposure;
- Traffic safety impacts on a busy road with fast-moving traffic adjacent to a popular cycling route on the Joe Rodota trail. On July 26, 2022, Santa Rosa City Council adopted the Sonoma County [Vision Zero Action Plan](#) (VZAP). The VZAP set a target goal of zero traffic deaths and severe injuries on roadways within Santa Rosa by 2030

### 3. Blue Star Gas

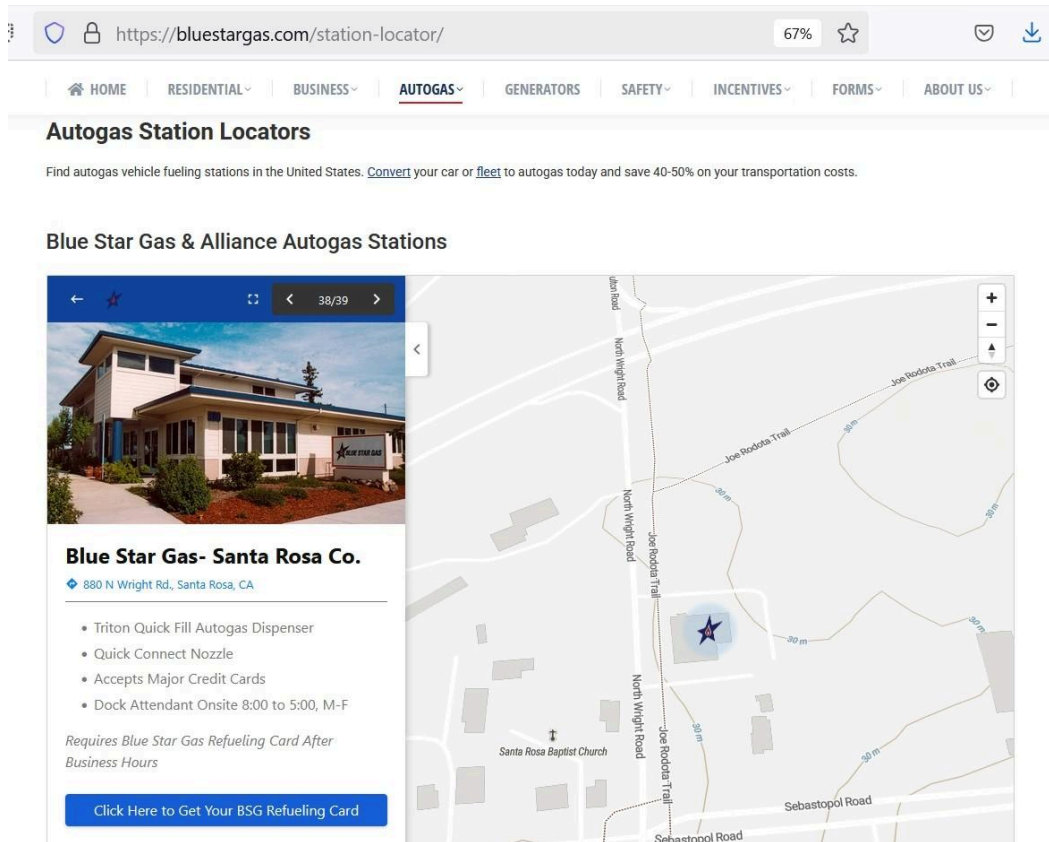
At 880 N. Wright Rd is the Blue Star Gas propane vehicle fueling station, a service station, within 500 feet of the proposed gas station on the adjacent property. Code §20-42.150 prohibits a service station within 500 feet of *any other service station*.

We appreciate staff for hearing our concern and staff's work delving into the complex topic of what constitutes a gas/service station. Staff have provided several examples of other governmental agencies with different definitions and designations that regulate propane fueling differently than gasoline fueling stations. While the Blue Star Gas propane vehicle fueling station might not meet those other agencies' requirements, what is key is the Santa Rosa Code provides a clear definition of a service station that the Blue Star Gas propane vehicle fueling station certainly does meet.

The applicable Santa Rosa Code definition is "**Gas Station. A retail business selling gasoline and/or other motor vehicle fuels, and related products.**" This **Santa Rosa Code §20-70.020** was amended when the gas station ban was adopted in 2022, changing the definition to "A retail business selling gasoline and/or other motor vehicle fuels derived from fossil fuels (e.g., petroleum, coal, natural gas), and related products." The Blue Star Gas vehicle fueling station meets both the earlier and current version of the definition in Santa Rosa's Code.

Blue Star Gas at 880 N. Wright Rd is a retail business selling a motor vehicle fuel. Its fuel is derived from fossil fuels; it's a propane fuel for vehicles that Blue Star Gas calls "Autogas." The Blue Star Gas website shows their retail business offers propane fuels including Autogas. The website includes an Autogas Station Locator that displays the station at 880 N. Wright Rd offering its Autogas vehicle fueling services.

<https://bluestargas.com/station-locator/>



The propane vehicle fueling station at Blue Star Gas both meets the Santa Rosa Code definition of Service Station and is also compatible with Blue Star Gas's permitted land use of "fuel dealer" defined as "a retail trade establishment that sells fuel oil, butane, propane and liquefied petroleum gas (LPG), bottled or in bulk, to consumers." The proximity of the proposed gas station to the existing Blue Star Gas facility would compound the risks, as well as increase the cumulative impacts to air and water quality.

In addition to the concerns raised above, please see attached our letter of November 8, 2024. In particular, please see the listing of conflicts with Santa Rosa's General Plan.

On behalf of CONGAS, its 1000+ supporters in Sonoma County, and the co-signing organizations and individuals below,

Respectfully Submitted,

 Jenny Blaker

Woody Hastings, Co-coordinator, CONGAS  
Jenny Blaker, Co-coordinator, CONGAS

Wendy Krupnik, Proprietor  
Chiatri de Laguna Farm

Laura Neish, Executive Director  
350 Bay Area

Christine Hoex, Steering Committee Member  
350 Sonoma

Dee Swanhuyser  
Sonoma County Rural Alliance

Reuben Weinzveg, Treasurer  
Sonoma County Tomorrow

Padi Selwyn, Co-chair,  
Preserve Rural Sonoma County

*Eris Weaver*

Eris Weaver, Executive Director  
Sonoma County Bicycle Coalition

Kevin Conway, Santa Rosa  
Friends of the Climate Action Plan

Lawrence Jaffe and Nancy Cadigan, Co-Presidents  
Sebastopol Grange #306

Steve Birdlebough, Advocate  
Sonoma County Transportation and Land Use Committee

Paul Larkin  
Citizens' Climate Lobby, Santa Rosa Chapter

Nathan Taft, Senior Campaigner  
SAFE Cities with Stand.earth

Leah Redwood  
Extinction Rebellion San Francisco Bay Area

Portia Sinnott, Executive Director  
LITE Initiatives, Community Bikes Program

Beverly Alexander  
Protect Wild Petaluma 

Sonoma County Climate Activist Network (SoCoCAN!)

Ann Hamilton (she/her/ella), North Bay Resilience Manager  
Greenbelt Alliance

Neal Fishman, Board President  
Sonoma County Conservation Action

### **Individuals**

Jerry Bernhaut, Environmental Attorney  
Veronica Jacobi, Former Santa Rosa City Councilmember  
Alaya Babineau, Wilderness Within Sebastopol

Janus Matthes, Wine & Water Watch  
Gail Yamamoto Seymour, Retired Governmental Environmental Scientist, Santa Rosa  
Teri Shore, Sonoma County Environmentalist  
Rue Furch, Sonoma County Environmentalist  
Cate Steane, Sonoma County Environmentalist  
Jane Bender, Former Santa Rosa City Councilmember and Mayor  
Laurel Chambers, Santa Rosa resident  
Wayne Yamagishi & Debbi Yamagishi, Santa Rosa residents  
Steven Pierce, CityClimateDashboard.org

## **ATTACHMENT**

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**Letter from November 2024**



Santa Rosa Planning Commission  
City Hall, 100 Santa Rosa Ave,  
Santa Rosa, CA, 95404  
Via email: [planningcommission@srcity.org](mailto:planningcommission@srcity.org)

November 8, 2024

**Subject: 874 North Wright Road Gas Station (File # PRJ21-033)**

Dear Chair Weeks and Commissioners:

There are many reasons for the Commission to reject the Addendum to the Mitigated Negative Declaration (MND) and deny the Conditional Use Permit (CUP) for the development of a gas station with extended hours of operation, two general retail land uses across two buildings, one apartment and a small park at 874 N. Wright Road. Most of these reasons relate to the gasoline fueling component of the application.

In September 2022 Santa Rosa, along with five other cities and the County of Sonoma, passed ordinances prohibiting the permitting of new gas stations. The 874 N. Wright Road was excluded because its permit application was already deemed complete prior to adoption of the ordinance. However, a completed application does not require the Commission to grant a permit for the construction of this new gas station.



There is nothing unique about this project that overcomes the fact that at its core, it is new fossil fuel infrastructure. The Commission should deny the permit on the same grounds on which the Commission and Santa Rosa City Council based the citywide prohibition on new gas stations.

There is no need for another gasoline station in Santa Rosa. There are already more than ten operating gasoline stations within a five-mile radius of this project site and over 40 in total in and near Santa Rosa.

CONGAS and the coalition of co-signers urge the Planning Commission to (1) Deny the addendum to the Elm Tree Station Mitigated Negative Declaration and (2) Deny the Conditional Use Permit.

## **ADDENDUM TO MITIGATED NEGATIVE DECLARATION**

According to the staff report, October 24, 2024, p. 11, *This Addendum relies on the Mitigated Negative Declaration adopted by the Planning Commission on October 24, 2013, by Resolution No. 11653* and the analysis discusses whether there has been a substantial change in circumstances or if new information exists to such a degree that a new or subsequent Mitigated Negative Declaration should be required.

Under CEQA Guidelines Section 15164, *an addendum to an adopted negative declaration shall be prepared if only minor technical changes or additions are necessary. Under Section 15162, the lead agency shall prepare an EIR if there are one or more significant effects or an increase in the severity of previously identified significant effects.*

**Changes from 2013 to 2024:** It is undeniable that there have been many changes in circumstances and new information that has become available since 2013. While the Addendum attached to Resolution No. PC-2024-024 acknowledges some changes since 2013 regarding Air Quality, Energy, GHGs, Traffic, and Wildfire, there are others also. For example, the Addendum addresses the fact that Vehicle Miles Traveled (VMT) has replaced Level of Service (LOS) as a criterion, but still assumes the same level of 1,506 net new daily vehicle trips per day, despite an increase in population and so potentially increases in traffic since 2013. The 2013 Traffic Report used collision rates calculated based on California Highway Patrol records dating back to July 2006 to June 2011. Santa Rosa's Bicycle & Pedestrian Plan was updated in 2018, and is currently being updated again as the Active Transportation Plan. There is no reference to the new Highway 12 Interchange Feasibility Study currently underway. These substantive changes since 2013 suggest that the traffic studies need to be updated to take account of current conditions – and these are just a few examples.

Public awareness of the climate crisis has grown enormously since 2013. The City of Santa Rosa passed a Climate Emergency Resolution in January 2020, which included the statement that *the City of Santa Rosa joins a nationwide call for a just transition away from fossil fuels and an urgent collaborative climate mobilization effort focused on enacting policies that dramatically reduce heat-trapping emissions, and rapidly catalyzing a mobilization at all levels of government to restore a safe climate.*<sup>1</sup> Approving a new gasoline station in 2024 would be contradictory to the City's own policies on climate action. It would add new fossil fuel infrastructure and another new source of GHG emissions instead of supporting a transition away from fossil fuels.

Regarding Air Quality, the Addendum, p.15, 2.8, references air quality during construction but does not take into account long-term or cumulative impacts from a new gas station. The summary on p.15, 3. Air Quality is based on the 2013 Traffic Impact Study calculation that the project would generate 1,506 trips per day.

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<sup>1</sup> <https://www.srcity.org/DocumentCenter/View/28039/Climate-Emergency-Resolution>

Studies since 2013 have shown that gas stations vent far more toxic fumes than previously thought<sup>2</sup>. According to OSHA there is no safe level of exposure to gasoline and studies have shown links between gasoline exposure and childhood leukemia.<sup>3</sup> A 2021 Harvard study showed that 1 in 5 deaths worldwide are caused by fossil fuel emissions.<sup>4</sup> Gasoline stations inevitably lead to leaks and spills which contaminate surface and groundwater. Recent studies reveal more details about the impacts of groundwater contamination from gasoline on human health and the environment. *Even a small leakage rate of two drops per second can render nearly half a billion gallons of water unfit for drinking....Groundwater contamination around fuel stations in residential areas presents significant health risks to the local population*<sup>5</sup>.

These new studies suggest an increase in the severity of previously identified significant effects, and given that the adjacent site is zoned for medium density housing, adding further risk of groundwater contamination makes no sense.

Likewise, the immediate consequences of the climate crisis have become far more apparent since 2013 as Sonoma County residents have experienced the 2017 Tubbs wildfire and subsequent wildfires, floods, drought, extreme heat, and other climate anomalies.

Governor Newsom's Executive Order of 2020<sup>6</sup> will bring to an end the registration of new fossil-fueled cars by 2035. Gasoline sales are declining as more people switch to electric vehicles. These changes should be borne in mind while recognizing that when gas stations reach the end of their functional existence they require expensive clean up and are sometimes abandoned, leaving toxic sites that cannot be developed for other purposes.

This is not a comprehensive list of changes, but just a few immediately obvious examples of substantial changes in circumstances and context since 2013, that include significant effects and increases in severity of previously identified significant effects. They are far more than mere "minor technical changes or additions," and demand at minimum a comprehensive new Environmental Impact Report, not just an addendum to an outdated Mitigated Negative Declaration.

## CONDITIONAL USE PERMIT

Santa Rosa's [Instructions for Conditional Use Permit Applications](#) state that "*the [Planning Commission] may approve a Major Conditional Use Permit or Minor Conditional Use Permit only after first finding all of the following,*"

- 1. The proposed use is allowed within the applicable zoning district and complies with all other applicable provisions of this Zoning Code and the City Code;*
- 2. The proposed use is consistent with the General Plan and any applicable specific plan;*
- 3. The design, location, size, and operating characteristics of the proposed activity would be compatible with the existing and future land uses in the vicinity;*
- 4. The site is physically suitable for the type, density, and intensity of use being proposed, including access, utilities, and the absence of physical constraints;*
- 5. Granting the permit would not constitute a nuisance or be injurious or detrimental to the public interest, or health, or safety, or convenience, or welfare, or materially injurious to persons, property, or improvements in the vicinity and zoning district in which the property is located."* We underline "or" in that sentence to

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<sup>2</sup> <https://www.publichealth.columbia.edu/news/gas-stations-vent-far-more-toxic-fumes-previously-thought> (2018)

<sup>3</sup> <https://pmc.ncbi.nlm.nih.gov/articles/PMC10275799/> (2023)

<sup>4</sup> <https://www.hsph.harvard.edu/c-change/news/fossil-fuel-air-pollution-responsible-for-1-in-5-deaths-worldwide/> (2024)

<sup>5</sup> <https://www.sciencedirect.com/science/article/pii/S2405844024019558#bbib8> (2024)

<sup>6</sup> <https://www.gov.ca.gov/wp-content/uploads/2020/09/9.23.20-EO-N-79-20-Climate.pdf>



emphasize that the Commission must deny the CUP if it is the opinion of the Commission that any one of the standards are not met. It is not required that two or more of them be met.

6. *The proposed project has been reviewed in compliance with the California Environmental Quality Act (CEQA).*

At least five of these conditions have not been met:

Regarding **Condition 1, compliance with Zoning**: The Staff Report states that: *“The project site is within Planned Development (PD) 0435, which allows the service station (gas station) land use with the approval of a Conditional Use Permit. **Some development standards are not specifically addressed in the PD 0435 Policy Statement, so staff has analyzed the Project’s compliance with the most similar zoning district CG (General Commercial) in those cases.**”*

In other words, the project site did not meet the zoning conditions necessary for approval. On what grounds did staff decide to analyze the project’s compliance with the CG zoning district instead? What are the relevant differences between the project and PD development standards that were not met? The staff’s rationale for this choice is not made explicit.

**Distance between service station sites**: According to the the Staff Report, page 7, the proposed gas station is required to comply with these site requirements of Code §20-42.150:

1. Site area and dimensions. The site shall have a minimum area of 15,000 square feet, at least 100 feet of frontage on an arterial street, a minimum width of 150 feet, and a minimum depth of 100 feet.
2. Proximity to residential. The site shall not adjoin an existing R-1, R-2 or R-3 zoning district or single-family or two-family residential use at the time the service station use is established, except a nonconforming single-family or two-family residential use, or a single-family or two-family residential use in a commercial zone.

**3. Distance between service station sites. A proposed service station site shall be a minimum of 500 feet from any other service station site, with the following exceptions:**

**a) Service station sites within 150 feet of the U.S. Highway 101 intersections and Freeway 12 intersections measured along the intersecting street.”**

The Staff Report, page 8, regarding the above listed site requirement #3, incorrectly states that: *“The closest station is the Chevron station on Stony Point Rd., approximately 1.5 miles to the east. The next closest station is Roseland Gas on Sebastopol Road, approximately 2.3 miles to the east.”*

The Staff Report has neglected to recognize that the closest station is the Blue Star Gas station at 880 N. Wright Road, a parcel adjacent to the proposed project site, with no measurable distance separating them.

The Staff Report refers to Blue Star Gas as simply a “propane manufacturer.” However, Blue Star Gas at 880 N. Wright Rd also meets Santa Rosa’s definition of a gas station.

As the Staff Report on page 7 notes:

*Before the City Council banned new gas stations, the Code defined a Service Station as: “**a retail business selling gasoline and/or other motor vehicle fuels, and related products.**” ... Ordinance No. ORD-2022-010 (the 2022 ban) amended the definition of “Gas Station” as: “**a retail business selling gasoline and/or other motor vehicle fuels derived from fossil fuels (e.g., petroleum, coal, natural gas), and related products.**”*

Blue Star Gas at 880 N. Wright Rd is a retail business selling a motor vehicle fuel derived from fossil fuels, a propane fuel that Blue Star Gas calls "[Autogas](#)."

The Code requirement of distance between service station sites has an exception for "*Service station sites within 150 feet of the U.S. Highway 101 intersections and Freeway 12 intersections measured along the intersecting street.*" The exception cannot be applied for the proposed project. The proposed gas station site is over 300 feet from the intersection of Hwy/Freeway 12 measured along the intersecting street that is North Wright Road.

Construction of a gas station within 500 feet of another service station, such as the proposed development adjacent to the existing Blue Star Gas station, is explicitly prohibited by the Santa Rosa Zoning Code. The proposed project cannot qualify for a CUP because the proposed use does not comply with the applicable provisions of the Code. The Planning Commission must deny the permit.

Regarding **Condition 2, consistency with General Plan**: The staff report states the project is consistent with the Retail & Business Services designation in the General Plan, but there are notable inconsistencies with the General Plan, for example:

*LUL-A: Foster a compact rather than a scattered development pattern in order to reduce travel, energy, land, and materials consumption while **promoting greenhouse gas emission reductions** citywide.*

*LUL-A-1: As part of plan implementation – including development review, capital improvements programming, and preparation of detailed area plans – foster close land use/transportation relationships to promote use of alternative transportation modes and **discourage travel by automobile**.*

*LUL-I-2: Encourage region-serving, high volume retail outlets to locate near freeway access (generally within one-half mile of Highway 101) to minimize traffic on city streets. **Do not allow regional-serving uses in residential neighborhoods.***

*LUL-I-3: ...ensure that neighborhood centers do not create unacceptable traffic or nuisances for residents due to the hours and nature of their operation, and are designed to facilitate walking and bicycling.*

According to the Staff Report, p. 6, "*The attractive building design and site design will enhance the visual quality of the Highway 12 entry into the City...*" However, few people would generally regard a gas station as a scenic enhancement. The General Plan mainly highlights trees and other vegetation as scenic enhancements, e.g.:

*UD-C-4: Work with CalTrans to beautify Highway 101 and Highway 12.*

*Encourage CalTrans to incorporate more landscaping, planting of trees, and soundwall mitigation into any improvements planned for these highways. Lessen the impact of new soundwalls through the use of vegetation. Specific to Highway 12 (west of Highway 101), there are many places where the median is large enough to safely plant trees and make other significant landscaping improvements to enhance the scenic qualities of this roadway.*

*UD-C-5: Work with the County of Sonoma to retain and improve the scenic qualities of Highway 101 and Highway 12, including the planting of trees in the back of developments and along the edge of the CalTrans rights-of-way.*

*UD-C-7: Install planted medians on wide regional/arterial streets to make them more pedestrian friendly.*

Regarding **Condition 3, Proximity to existing and future uses**: Since the neighboring parcel to the east is zoned for future residential development, the project is incompatible with future land use.

Currently, users of the Joe Rodota Trail must proceed south on the sidewalk in front of the proposed project before crossing Wright Road, proceeding west on Sebastopol Road for two blocks before the trail picks back up again. This project would create a conflict zone for cyclists who would have to cross the driveways into the gas station. Contrary to being a convenient amenity for cyclists on the Joe Rodota trail as claimed, many cyclists feel that this project conflicts with their interests for a safe and pleasant cycling experience on the Joe Rodota trail.

**Regarding Condition 5, Public interest:** A gasoline station at this location would in fact be detrimental to the public interest, health, welfare, and safety. It is important to emphasize that the rules don't require a threshold or level of significant impact that may be found in a CEQA document to justify denial of the CUP. The rules state that the project simply cannot be a nuisance or detrimental to the public interest in the opinion of the Commission. The Commission is required to deny the CUP if the project is anticipated to do any *one* of the harms on the list quoted above. That is a basis upon which the Planning Commission must deny the CUP.

There is ample evidence that the burning of fossil fuels is the primary cause of anthropogenic climate heating.<sup>7</sup> Gasoline stations facilitate access to and burning of fossil fuels. Expansion of fossil fuel infrastructure prolongs and exacerbates the climate crisis. Therefore it is necessary for public interest, health, welfare, and safety that the city cease permitting new fossil fuel infrastructure.

In addition to global climate pollution, gas stations, in their normal operation, emit hazardous toxic air contaminants (several, such as benzene, with no safe level of exposure), contaminate surface water runoff, and pose hazards of contamination of soil and groundwater. This project is not far from residences and is sited adjacent to the Joe Rodota Trail, a trail where users should be able to breathe clean air while they walk or ride their bikes. Sonoma County is riddled with leaking underground storage sites, and when gas stations reach the end of their functional existence, the sites often become an expensive liability to be cleaned up, or abandoned toxic sites that cannot be developed for other uses. This is clearly contrary to the public interest.

For all these reasons, it is necessary for the public interest, health, safety, and welfare that the Commission reject this project.

**Regarding Condition 6, Compliance with CEQA:** As described above, the Addendum which relies upon the outdated Mitigated Negative Declaration should be replaced by a full Environmental Impact Report, given the substantive contextual changes that have taken place since 2013.

### **Other questions and inconsistencies**

- a. The staff report states that the application was deemed complete on Dec. 17, 2021; the addendum in Resolution 1 states that the complete application date was August 10, 2022. Which is correct?
- b. Is the project classified as primarily serving local-serving retail (as per W-Trans VMT analysis, July 20, 2022; Resolution 1, Addendum) or pass-by traffic, as per the 2013 Traffic Impact Study?
- c. Why is an 806-square foot, one-bedroom apartment being classified as a multifamily dwelling, per staff report?
- d. [Conditional Use Permits are generally granted for a one year period](#). Why is this one for two years?
- e. Attachment 11 – Communication from BAAQMD – refers to the 43 Middle Rincon Road project, not the 874 North Wright Road project.

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<sup>7</sup> <https://www.ipcc.ch/report/ar6/wg1/resources/climate-change-in-data/> (scroll to data point 7)

## Public Notice

Notifying the public about projects of this kind is required. None of the public noticing statements at the top of page 13 in the Staff Report about the public noticing for the October 24 Public Hearing were true. As noted in the staff report, project history, neighborhood meetings and notifications to property owners were sent in advance of previous public hearings in 2007 and 2011. The rules were being followed then, why not now? There has been no neighborhood meeting about this project. There was no evidence that property owners had been alerted about the pending project or the canceled October 24 Planning Commission. For projects of this kind, the applicant is required to install a sign at the perimeter. Santa Rosa city code (§ 20-66.020 Notice of hearing.)<sup>8</sup> states that *"When a land use permit, variance, or other matter is required by State law or this Zoning Code to have a public hearing, the public shall (emphasis added) be provided notice of the hearing in compliance with the provisions of this Chapter."* In "Method of notice distribution" it outlines requirements for mail, newspaper publication, site posting, and online posting. CONGAS has photographic and video evidence that no sign had been posted as of October 29, 2024.

We hope the correct procedures are being followed for the November 14 Public Hearing, but the lack of them for the previously scheduled October 24 meeting, despite assurances in the staff report that the requisite procedures had been followed, does nothing to inspire confidence in this process.

## Conclusion

Based on the finding that the project is within 500 feet of an existing gas station, which is prohibited by city code; that the project would be injurious to the public interest, health, safety and welfare; that public notice about the project and the Hearing did not occur in accordance with city code; that significant new information has become known since 2013; and that substantial inconsistencies exist in conflict with both the General Plan and the criteria for CUP approval, CONGAS respectfully requests that the Commission deny the CUP. To facilitate a denial, we have attached a [draft resolution](#) that substantiates this rationale for denial. The Commission may consider, as a condition of approval, requiring the applicant to revise the project with a new plan that eliminates the gasoline pumps from the project and that includes compliance with public noticing requirements.

Respectfully, on behalf of CONGAS, its 1000+ supporters in Sonoma County, and the co-signing organizations below,

Woody Hastings, Co-coordinator, CONGAS  
Jenny Blaker, Co-coordinator, CONGAS

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Jenny Blaker, Co-coordinator, CONGAS

Wendy Krupnik, Proprietor  
Chiatri de Laguna Farm

Laura Neish, Executive Director  
350 Bay Area

Christine Hoex, Steering Committee Member  
350 Sonoma

Dee Swanhuyser  
Sonoma County Rural Alliance

Reuben Weinzveg, Treasurer

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<sup>8</sup> <https://ecode360.com/42983981#42983983>

Sonoma County Tomorrow

Padi Selwyn, Co-chair,  
Preserve Rural Sonoma County

*Eris Weaver*

Eris Weaver, Executive Director  
Sonoma County Bicycle Coalition

Kevin Conway, Santa Rosa  
Friends of the Climate Action Plan

Lawrence Jaffe and Nancy Cadigan, Co-Presidents  
Sebastopol Grange #306

Steve Birdlebough, Advocate  
Sonoma County Transportation and Land Use Committee

Paul Larkin  
Citizens' Climate Lobby, Santa Rosa Chapter

Nathan Taft, Senior Campaigner  
SAFE Cities with Stand.earth

Leah Redwood  
Extinction Rebellion San Francisco Bay Area

Portia Sinnott, Executive Director  
LITE Initiatives, Community Bikes Program

Beverly Alexander  
Protect Wild Petaluma 

Sonoma County Climate Activist Network (SoCoCAN!)

Ann Hamilton (she/her/ella), North Bay Resilience Manager  
Greenbelt Alliance

Neal Fishman, Board President  
Sonoma County Conservation Action

## Individuals

Jerry Bernhaut, Environmental Attorney  
Veronica Jacobi, Former Santa Rosa City Councilmember  
Alaya Babineau, Wilderness Within Sebastopol  
Janus Matthes, Wine & Water Watch  
Gail Yamamoto Seymour, Retired Governmental Environmental Scientist, Santa Rosa  
Teri Shore, Sonoma County Environmentalist

Rue Furch, Sonoma County Environmentalist  
Cate Steane, Sonoma County Environmentalist  
Jane Bender, Former Santa Rosa City Councilmember and Mayor  
Laurel Chambers, Santa Rosa resident  
Wayne Yamagishi & Debbi Yamagishi, Santa Rosa residents  
Steven Pierce, CityClimateDashboard.org

**cc:**

Karen Weeks, Chair, Planning Commission  
Vicki Duggan, Vice Chair, Planning Commission  
Julian Peterson, member, Planning Commission  
Charles Carter, member, Planning Commission  
Patti Cisco, member, Planning Commission  
Aaron Pardo, member, Planning Commission  
Terrence Sanders, member, Planning Commission  
Natalie Rogers, Mayor, City of Santa Rosa  
Gabe Osburn, Director of Planning and Economic Development  
Jessica Jones, Deputy Director, Planning  
Conor McKay, Senior Planner