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March 10, 2021 TTA-07

Chandra Miehe
TAIT & Associates, Inc.
11280 Trade Center Drive
Rancho Cordova, CA 95742

Subject: **Responses to February 17, 2021 Comment Letter Regarding the 43 Middle Rincon Road 7-Eleven Project Air Quality and Greenhouse Gas Emissions Assessment**

Dear Ms. Miehe:

This letter contains responses to the written comments contained in a letter from Mr. Woody Hastings (commenter) representing the Coalition Opposing New Gas Stations, dated February 17, 2021, concerning the 43 Middle Rincon Road 7-Eleven Project (project) Air Quality and Greenhouse Gas (GHG) Emissions Assessment letter report (Assessment) prepared by HELIX Environmental Planning, dated July 31, 2020.

RESPONSES TO COMMENTS

The following responses have been prepared for submittal to the City of Santa Rosa (City) for consideration in determining the adequacy of the Assessment in evaluating the significance of potential Air Quality and GHG emissions impacts in support of an Initial Study/Mitigated Declaration (IS/MND) for the project under the California Environmental Quality Act (CEQA). Responses are numbered corresponding to the bracketed and numbered comments in Attachment A to this letter.

Response 1

The commenter asserts that the Assessment is "fatally flawed in that it omits significant information regarding past and recent local, regional, and state climate policy developments." The commenter furthers asserts that the impact conclusion of less than significant with mitigation regarding whether the project would conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs is incorrect. This is a general comment concerning the overall adequacy of the Assessment. The significant information alleged to be omitted by the commenter is discussed in Responses 5 through 12, below.

Response 2

The commenter lists some of the omitted policies discussed later in the comment letter. These omitted policies are discussed in Responses 5 through 12, below.

Response 3

The commenter acknowledges that the Assessment used the Bay Area Air Quality Management District (BAAQMD) significance thresholds to determine significance levels of GHGs and concluded that the project's net operational GHG emissions would be below the BAAQMD adjusted screening thresholds and would be less than significant. The commenter further discusses the significance criteria from Appendix G of the CEQA Guidelines: "[…] a project would have a significant environmental impact if it would: […] b) Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs?" The commenter asserts "Since the Assessment fails to include all city of Santa Rosa, any Sonoma County GHG or any Regional Climate Protection Authority (RCPA) policy, and not all California State policy, it is incomplete and inadequate and its conclusion/s should be rejected."

There are two significance criteria identified on page 18 of the Assessment, which are identical to those stated in Appendix G of the CEQA Guidelines. The first is specific to a project's emissions, and the second considers whether a project would conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs. The project's future GHG emissions were quantified and compared to the BAAQMD threshold (adjusted to account for Senate Bill [SB] 32 GHG reduction mandates in the discussion of the standard of significance: "a) Generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment?" Whether the project would conflict with applicable GHG reduction plans policies, or regulations is evaluated in a separate impact discussion beginning on page 20 of the Assessment. As discussed further in the responses below, the Assessment adequately analyzed the relevant plans, policies, and regulations with the intent of reducing GHG emissions that would be applicable to the project.

Response 4

The commenter provides a general opinion on the merits of the project and does not address the adequacy of the analysis. The construction of fueling stations is not specifically prohibited or discouraged in any of the plans mentioned in the comment.

Response 5

The commenter discusses the City of Santa Rosa Resolution RES-2020-002, Resolution of the Council of the City of Santa Rosa Endorsing the Declaration of a Climate Emergency and Immediate Emergency Mobilization to Restore a Safe Climate, passed by the City Council on January 14, 2020. The commenter infers that this City Council resolution constitutes an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs and whether the project would conflict with this resolution should have been discussed in the reduction of GHG emissions applicable to the project. The only actions contained in the resolution pertaining to GHG emissions reductions are a resolution that the City commits to contributing to the development of a countywide 2030 Climate Emergency Mobilization Strategy that focuses on identifying key local actions.[1] If a countywide 2030 Climate Emergency Mobilization Strategy were to be adopted by the City, it could be applicable to the project. However, such a strategy has not been drafted or adopted. The commenter asserts that by merely

[1] City of Santa Rosa Council Resolution RES-2020-002, January 14, 2020. https://srcity.org/DocumentCenter/View/28039/Climate-Emergency-Resolution.

considering the construction of a gas station, the City is in conflict with this policy, however, as noted earlier, no policies have been put in place to restrict the development of fueling stations.

Response 6

The commenter discusses the Sonoma County (County) Board of Supervisors Resolution of the County of Sonoma Endorsing the Declaration of a Climate Emergency and Immediate Emergency Mobilization to Restore a Safe Climate. The County Resolution does not contain any specific action or mandate for the reduction of GHG emissions applicable to the project. Similar to Response 5, above, the only actions contained in the resolution pertaining to GHG emissions reductions are a resolution that the County commits to contributing to the development of a countywide 2030 Climate Emergency Mobilization Strategy.[2] The development of the project would not conflict with the implementation of this resolution. No changes to the analysis contained within the Assessment is necessary.

Response 7

The commenter discusses the Sonoma County Board of Supervisors Resolution 18-0166: Reaffirming Its Intent To Reduce Greenhouse Gas Emissions As Part Of A Coordinated Effort Through The Sonoma County Regional Climate Protection Authority [RCPA] And To Adopt Local Implementation Measures As Identified In Climate Action Plan 2020 and Beyond. The resolution contains goals to reduce GHG emissions and commits to local action to support those goals.[3] Local actions adopted by the Sonoma County Board of Supervisors would apply to agencies of the County and unincorporated areas within Sonoma county. The project site is within the City of Santa Rosa and the County resolution would not be applicable to the project. The Assessment contains analysis with regard to the project's consistency with the City's Climate Action Plan and with Senate Bill 32, which addresses the reduction of GHG emissions to year 2030. As noted in the Assessment, the project would be required to implement measure GHG-1, which contains requirements for the project to be consistent with the City's CAP. Further, the project would be consistent with Plan Bay Area 2040, which aims to reduce GHG emissions in the transportation sector. Because the project would be considered local-serving retail, it would not result in an increase in vehicle miles traveled and would be consistent with Plan Bay Area 2040. Therefore, even though it does not apply to projects within Santa Rosa, development of the project would not conflict with the implementation of Resolution 18-0166. No changes to the analysis contained within the Assessment are necessary.

Response 8

The commenter provides a bullet list of six resolutions, plans or actions taken by the County between 2002 and 2012. The 2002 resolution is specific to the County's internal operations and is not applicable to the project. The document referenced by the commenter for the 2005 item is a regional planning-level document addressing GHG reductions by year 2015 and no longer applies. The Climate Action Protection Plan (2006) is a County-approved document and is not applicable projects in the City of Santa Rosa. The 2008 item is a County commitment to develop a Regional Climate Protection Coordination Plan, which resulted in formation of the Regional Climate Protection Authority in 2009 (see Response 9,

[2] Sonoma County Board of Supervisors Resolution, September 17, 2019. https://sonomacounty.ca.gov/CAO/County-Declares-Climate-Emergency/.

[3] Sonoma County Board of Supervisors Resolution 18-0166, May 8, 2018. https://sonomacounty.ca.gov/PRMD/Long-Range-Plans/Climate-Change-Action-Resolution/.

below). The 2012 item concerns electrical utility aggregation, which has no bearing on the project. None of the items listed in the comment would apply to the project and therefore no changes to the Assessment are required.

Response 9

The commenter discusses the RCPA as an organization and the RCPA's Climate Emergency Resolution and 2030 Climate Emergency Mobilization Strategy. As explained by the organization, the RCPA is made up of representatives from the Sonoma County Board of Supervisors and Council Members from each of the nine Sonoma County incorporated cities – Cloverdale, Cotati, Healdsburg, Petaluma, Rohnert Park, Santa Rosa, Sebastopol, Sonoma, and Windsor. The RCPA coordinates the activities of local jurisdictions with regional, state, and federal entities at both policy and administrative levels. As a coordination agency, the RCPA provides a forum for local elected officials to engage in dialogue on countywide issues and enables discussions among local and regional entities on a wide range of issues related to greenhouse gas reduction, including planning, program management, and project delivery.[4] The RCPA is not a regulatory agency and has no jurisdictional authority to implement a GHG reduction plan, policy, or regulation. Any such reduction plan, policy or regulation promulgated by the RCPA must be adopted by each constituent agency to become binding within their respective jurisdictions.

The RCPA drafted the Climate Action 2020 Plan: A Regional Program for Sonoma County Communities. The RCPA certified an Environmental Impact Report (EIR) and adopted the Climate Action 2020 Plan in 2016. Subsequently the EIR was litigated, and the Superior Court found the EIR inadequate. The Regional Climate Protection Authority declined to appeal and neither the City nor the County has adopted the Climate Action 2020 Plan. Because the City has not adopted RCPA's 2020 Climate Action Plan, there are no associated plans, policies or regulations that would apply to the project.

The RCPA, the City, and the County have all adopted resolutions to develop a countywide 2030 Climate Emergency Mobilization Strategy. The 2030 Climate Emergency Mobilization Strategy has not been written or adopted and is not an GHG reduction plan, policy, or regulation applicable to the project.

The commenter asserts that constructing a new gas station at a time when use of gasoline is on the wane will create a stranded liability for both the developer as well as the City. The commenter's opinion regarding the future of the gas station is speculative and does not address the adequacy of the analysis in the Assessment.

Response 10

The commenter summarizes Executive Order N-79-20, which sets a goal of 100 percent of in-state sales of new passenger cars and trucks to be zero-emission by 2035. This executive order does not apply to the project, which is a convenience store and gas station. No change to Assessment is needed.

Response 11

The commenter summarizes Executive Order B-55-18, which sets a goal to achieve carbon neutrality as soon as possible, and no later than 2045. Executive Orders are not laws and can only provide the governor's direction to state agencies to act within their authority to reinforce existing laws. There is no

[4] About RCPA. Accessed March 8, 2021. https://rcpa.ca.gov/about-rcpa/.

legislation to enact the goals of Executive Order B-55-18. The Assessment correctly described and analyzed the project relative to the current statewide GHG reduction mandates as enacted by Assembly Bill (AB) 32 and SB 32, which respond to goals established by Executive Orders S-3-05 and B-30-15. No change to the Assessment is needed.

Response 12

The commenter describes Executive Order B-48-18, which sets a goal of 5 million zero-emission vehicles and the installation of 250,000 electric vehicle chargers in the State by 2030. This executive order does not apply to the project, which is a convenience store and gas station. Implementation of the project would not affect the ability of the state to achieve the goal of this executive order if local agencies choose to legislate it.

The commenter's opinion regarding the economic viability of a 12-pump gas station is speculative and does not address the adequacy of the analysis in the Assessment.

Response 13

The commenter, on the behalf of the Coalition Against New Gas Stations, concludes with an expression of general opposition to the project. As noted in Responses, the analysis within the Assessment adequately addressed the consistency of the project with the relevant policies and regional goals aimed towards the reduction of regionwide GHG emissions, such as the Plan Bay Area 2040 and the City's CAP. No change to the Assessment is required.

CONCLUSION

The commenter asserts that the Assessment is inadequate and the GHG emissions impact conclusions are incorrect because a specific set of resolutions and planning-level documents at the local and regional levels and Executive Orders at the State level were not discussed in the report. As discussed in the above responses, none of the items specifically listed by the commenter would constitute a plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs that would be applicable to the project. Other than broad generalization and opinion, the commenter does not provide substantial evidence indicating that there would be significant impacts not disclosed in the letter report.

Sincerely,

Martin Rolph
Air Quality Specialist

Joanne M. Dramko, AICP
Principal Air Quality Specialist

Attachments:

A: Bracketed Comment Letter from CONGAS dated February 17, 2021

Attachment A

Bracketed Comment Letter from CONGAS dated February 17, 2021

CONGAS
Coalition Opposing New Gas Stations

February 17, 2021

Adam Ross, Interim Senior Planner
Planning Division, City of Santa Rosa
Via Email: aross@srcity.org

Subject: 43 Middle Rincon Road 7-Eleven Project (Case file no. PRJ19-032) Air Quality and Greenhouse Gas Emissions Assessment (Prepared by HELIX Environmental Planning, Inc., dated July 31 2020)

Dear Mr. Ross, Applicant, and Decisionmakers:

The following are comments of the Coalition Opposing New Gas Stations (CONGAS)[1] on the Greenhouse Gas (GHG) Analysis section (pages 15-22) of the Air Quality and Greenhouse Gas Emissions Assessment (Assessment) prepared for 43 Middle Rincon Road 7-Eleven Project, case file no. PRJ19-032, by HELIX Environmental Planning, Inc., dated July 31 2020. For CONGAS's perspective on other site-specific air quality, groundwater, and public health related issues that are common to all gas stations, please see the attached report produced by Coltura "Governing The Gasoline Spigot: Gas Stations And The Transition Away From Gasoline."[2]

The Helix Assessment is fatally flawed in that it omits significant information regarding past and recent local, regional, and state climate policy developments. The report concludes that "…the project would be consistent with local and regional GHG emission reduction plans, including the City Climate Action Plan, and would result in a less than significant impact with mitigation."

1

This conclusion is incorrect, as it does not take into consideration significant information, some available prior to the report publication date, and some that has come to light since the report was published. Whether the conclusion is correct or not, decisionmakers should bear in mind that the Assessment is an *informational* document. The conclusion reached in the Assessment does not necessarily dictate what the conclusion or decision about the overall project should be. That decision is at the discretion of the decisionmakers.

In reviewing the climate policy framework, the Assessment references Santa Rosa's Climate Action Plan and gubernatorial Executive Orders S-3-05 of 2005 and B-30-15 of 2015, and Assembly Bill 32 and Senate Bill 32 of 2016, and stops there. These are all good elements of state policy that address GHG reduction goals, but there is more. The problem is that much has transpired since 2016, and the urgency of addressing the climate crisis is far clearer today.

2

[1] http://con-gas.org/
[2] Coltura Report Download website: https://www.coltura.org/gas-stations

These omitted policies include, and are not limited to:

- Santa Rosa Climate Emergency Resolution
- Sonoma County Climate Emergency Resolution
- RCPA Climate Emergency Resolution and Climate Mobilization Strategy
- Governor's Executive Order B-55-18
- Governor's Executive Order N-79-20

2

The Assessment uses Bay Area Air Quality Management District (BAAQMD) significance thresholds to determine significance levels of GHGs. The BAAQMD thresholds were developed to be consistent with California Environmental Quality Act (CEQA) Guidelines. The Assessment concludes that "The project's net operational GHG emissions would be below the BAAQMD adjusted screening thresholds and would be less than significant." However, the Assessment correctly references in its "Significance Criteria" (pg. 18), that Appendix G of the CEQA Guidelines states that "a project would have a significant environmental impact if it would… [c]onflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs." We particularly want to emphasize the inclusion of "policy" in that provision, as it is a failure on the part of the Assessment to recognize significant policy with which the project is at odds. Since the Assessment fails to include *all* city of Santa Rosa, *any* Sonoma County GHG or *any* Regional Climate Protection Authority (RCPA) policy, and not *all* California State policy, it is incomplete and inadequate and its conclusion/s should be rejected.

3

Constructing new fossil energy infrastructure of the kind proposed by 7-Eleven runs directly counter to the many plans and policies set forth by both the City of Santa Rosa, Sonoma County and its unique RCPA, and the State of California relative to GHG reductions and advancement of clean vehicles.

4

Climate Policy Conflicts – 43 Middle Rincon Road 7-Eleven Project (Case file no. PRJ19-032)

1. City of Santa Rosa GHG Policies, Plans, and Actions not addressed in the Assessment

In January 2020, well before the Assessment was completed, Santa Rosa adopted a Climate Emergency Resolution (CER).[3] The CER commits the Santa Rosa, in addition to other provisions, the following:

- *"…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;"*
- *"…addressing climate change underscores everything that we do, and the City remains committed to taking action to mitigate, draw down, and take adaptive measures, with the goal of reaching carbon neutrality by 2030."*

5

[3] Santa Rosa Climate Emergency Resolution: https://srcity.org/DocumentCenter/View/28039/Climate-Emergency-Resolution

If the Santa Rosa CER is to be taken seriously, the cessation of construction of new, unnecessary fossil fuel infrastructure is an obvious first step. The issues at hand is not about direct point source GHG emissions from the proposed fueling facility, the issues is around expanding fossil fuel infrastructure that extends dependence on the fuels that are widely accepted as directly causing the crisis. 5

2. Sonoma County climate policies, plans, and actions not addressed in the Assessment

Sonoma County has a well-established history of commitments in response to the global climate crisis. 6

On September 17, 2019, Sonoma County adopted a Climate Emergency Resolution,[4] declaring the intention of the County to mobilize an emergency response commensurate with the scale of the climate crisis. The resolution includes a directive to partner with the RCPA to address the climate crisis by developing and implementing the 2030 Climate Emergency Mobilization Strategy, which includes the City of Santa Rosa.

On May 8, 2018, the Sonoma County Board of Supervisors adopted the "Climate Change Action Resolution" to support a county-wide framework for reducing GHGs and to pursue *local actions* that support the identified goals.[5] Denial of the permit in question would constitute a local action consistent with County policy. The County agrees to work toward the Regional Climate Protection Authority's (RCPA's) countywide target to reduce GHG emissions by 40% below 1990 levels by 2030 and 80% below 1990 levels by 2050; Specific Goals in the Resolution include: 7

- Increase renewable energy use
- Switch equipment from fossil fuel to electricity
- Reduce travel demand through focused growth
- Encourage a shift toward low-carbon transportation options
- Increase vehicle and equipment fuel efficiency
- Encourage a shift toward low-carbon fuels in vehicles and equipment

Prior to the May 8 Climate Change Action Resolution, beginning in 2002, the County made the following commitments, not considered in the Assessment: 8

- 2002 – The Board of Supervisors approved a Resolution to set a target to reduce the County's internal operations' greenhouse gas emissions by 20% of year 2000 baseline levels to approximately 30,000 tons per year by the year 2010;[6]

[4] Sonoma County Climate Emergency Resolution: https://sonomacounty.ca.gov/CAO/County-Declares-Climate-Emergency/
[5] https://sonomacounty.ca.gov/PRMD/Long-Range-Plans/Climate-Change-Action-Resolution/
[6] See "past board action": http://sonoma-county.granicus.com/MetaViewer.php?view_id=&clip_id=182&meta_id=67630

- 2005 – The Board of Supervisors, along with all other local jurisdictions in the County, committed to a community-wide goal of a 25 percent reduction in greenhouse gas emissions from 1990 baseline levels by the year 2015;[7]
- 2006 – The Board of Supervisors approved the Climate Protection Action Plan as the roadmap to create certain specific GHG reductions;[8]
- 2008 – The Board of Supervisors approved development of a Regional Climate Protection Coordination Plan;[9]
- 2009 – The County and its nine cities formed the Regional Climate Protection Authority to coordinate countywide climate protection efforts;[10]
- 2012 – The Board of Supervisors voted to create the Sonoma Clean Power Community Choice Aggregation agency with reductions of GHGs attributable to Sonoma County as its primary goal.[11]

8

3. RCPA not mentioned at all in the Assessment

The RCPA, was formed in 2009 to coordinate countywide climate protection efforts among Sonoma County's nine cities and multiple agencies. The RCPA fosters collaboration, helps to set goals, pools resources, formalizes partnerships, and works across silos. The RCPA aims to create local solutions to complement State, Federal, and private sector actions – all showing that a better future with lower emissions is possible.

In September 2019, the RCPA Board adopted a Climate Emergency Resolution[12] outlining the agency's commitment to leading countywide efforts to mitigate climate change in the decade ahead. The resolution directed the RCPA to develop a 2030 Climate Emergency Mobilization Strategy.[13] The CER, among other provisions,

9

- *"declares that a climate emergency threatens humanity and the natural and built environments;*
- *calls for a just transition away from fossil fuels;*
- *calls for 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;*
- *calls for an urgent global climate mobilization…to reverse global warming…to achieve zero net emissions as quickly as possible;*
- *acknowledges that there is still time to act and that successful climate action and a just transition at scale requires that our members and partners work both within and*

[7] See "Prior Board Action" http://sonoma-county.granicus.com/MetaViewer.php?view_id=2&clip_id=784&meta_id=242232
[8] Ibid
[9] Ibid
[10] https://rcpa.ca.gov/
[11] https://sonomacleanpower.org/
[12] RCPA Climate Emergency Resolution: https://rcpa.ca.gov/wp-content/uploads/2019/11/RCPA_CER_2019_Redacted.pdf
[13] RCPA Climate Mobilization Strategy: https://scta.ca.gov/wp-content/uploads/2020/08/2030_EmergencyPolicyPackage_Framework-DRAFT-2020-07-27.pdf

outside of our regional boundaries and across sectors to accelerate the necessary systems change required to address the climate emergency.

The Climate Emergency Mobilization Strategy includes a program aimed at accelerating adoption of electric vehicles (EVs) in Sonoma County. The EV Access for All Partnership aims to accelerate the transition to 100 percent EVs for all transportation needs not met by biking or walking. It will a. Work with regional partners and local businesses to develop 11,750 public and workplace charging stations in Sonoma County by 2027. b. Develop a package of local ordinances and other actions to address remaining permitting barriers for installing charging equipment and accelerate the shift away from the permitting of new fossil fuel infrastructure. c. Create accessible EV ownership/lease concierge service for low-income, students, and seniors. 9

This program is significant and relevant to the 7-Eleven application due to the fact that constructing a new gas station at a time when use of gasoline is on the wane will create a stranded liability for both the developer as well as the City. This is particularly true as it relates to clean-up of inevitable contamination removal of underground storage tanks that will need to be removed far sooner than the developers and the City may currently imagine.

4. State policy not addressed in the Assessment:

- **EO N-79-20** Executive Order N-79-20 by Governor Newsom setting a date-certain (2035) for cessation of sales of new gas-powered cars.[14] 10

- **EO B-55-18**. On September 10, 2018, Governor Brown issued Executive Order B-55-18, which set a new statewide goal to "achieve carbon neutrality as soon as possible, and no later than 2045…in addition to the existing statewide targets of reducing greenhouse gas emissions."[15] Governor Newsom has since affirmed this policy goal and built upon in. In several cases, policies set by executive order are further affirmed and refined in the legislature. This is an ambitious goal, but the policy trajectory is clear. In order to achieve a goal like this, local actions of permitting authorities must be in alignment, and must begin now. 11

- **EO B-48-18**. In January 2018, Governor Brown issued Executive Order B-48-18[16] calling for 5 million zero-emission vehicles (EVs) by 2030 and the installation of 250,000 electric vehicle chargers in the State. Currently the national EV fleet is over 1.4 million, with over 800,000 EVs in CA.[17] With the rapid rise of practical and affordable EVs, and many new 12

[14] Exec. Order N-79-20: https://www.gov.ca.gov/wp-content/uploads/2020/09/9.23.20-EO-N-79-20-text.pdf
[15] https://www.gov.ca.gov/wp-content/uploads/2018/09/9.10.18-Executive-Order.pdf
[16] https://www.ca.gov/archive/gov39/2018/01/26/governor-brown-takes-action-to-increase-zero-emission-vehicles-fund-new-climate-investments/index.html
[17] 2019 update to Beyond Combustion https://cleanpowerexchange.org/wp-content/uploads/2017/08/EV-CCP-white-paper-August-2017.pdf

models coming soon,[18] the need for charging infrastructure will inevitably grow as the need for gasoline stations diminishes. Santa Rosa should make wise investments based on clear trends that indicate that a new 12-pump gasoline fueling station may be abandoned as unprofitable in a few short years. 12

CONGAS urges the Santa Rosa Planning Commission, City Council, and other decisionmakers to take into account the City's well-established commitment to meaningfully addressing the climate crisis. An obvious first step toward that end would be to stop pouring fuel on the fire. In order to be consistent with Santa Rosa's own policies, State policy, along with Sonoma County and Regional policy, this permit application and proposal must be denied. 13

Please share this correspondence with the applicant, the Santa Rosa City Council, and all other relevant decisionmakers.

Sincerely,

Woody Hastings, CONGAS Co-coordinator
congas.contact@gmail.com
707-238-2298

[18] https://www.consumerreports.org/hybrids-evs/new-long-range-affordable-electric-cars-coming-soon/