



MEMORANDUM

DATE: November 6, 2025

TO: Chair Jones-Carter and Design Review and Preservation Board Members

FROM: Jessica Jones, Deputy Director – Planning

CC: Gabe Osburn, Director of Planning and Economic Development
Ashle Crocker, Assistant City Attorney
Conor McKay, Senior Planner

SUBJECT: 874 N Wright Road – Elm Tree Station Design Review – Response to Comments

The subject Design Review application for the Elm Tree Station Project, located at 874 N Wright Road (Project), is scheduled before the Design Review and Preservation Board (DRPB) on November 5, 2025. The DRPB has received e-mails, including a reference to comments provided by Sonoma County Conservation Action, making a variety of claims related to the merits of the project and its associated design review findings. The following memo will describe each claim and provide a staff response.

1. The site floods every winter.

Claim: Several aspects of the Elm Tree Station project will be of great risk of impacting the public health, safety and welfare and is likely to be materially injurious to properties in the vicinity. This site floods every winter. The addition of buildings and impervious surfaces means the water will go into the street and neighborhood carrying toxic waste from the gas station and parking lots with it. To minimize these impacts, the developer should be required to minimize the footprints of the buildings, install permeable paving and extensive drains with capacity for "100 year" floods. A hydrologist engineer should be required to evaluate this site and determine where all that water will go. The commentor does not believe that these concerns have been addressed in the current plan.

Response: As documented in the Exhibit A, dated September 4, 2024, to City Council Resolution No. RES-2025-141, which approved the Conditional Use Permit, the Project has been conditioned to address site drainage. Specifically, the Project is required to be designed to City of Santa Rosa Design and Construction Standards and the Sonoma County Water Agency Flood Management Design Manual Standards by a licensed civil engineer. The conditions of approval also require the

Project to comply with all requirements of the City's Standard Urban Storm Water Low Impact Development Plan (SWLID). While the site currently experiences temporary inundations, the post development will be designed in accordance with the project conditions of approval that will address drainage issues. It should also be noted that the subject property is not in a FEMA-designated flood plain, nor is it proposed to be in the new FEMA Special Flood Hazard Area maps for Santa Rosa Creek and its tributaries.

2. The design is inconsistent with the community character.

Claim: This site has been an oak woodland, wildlife corridor and flood plain. The current design is inconsistent and incompatible with the community character. Any development must have a low profile and protect these critical natural functions and appearance to the community.

Response: As noted above, the Project site is not located within an existing or proposed flood plain. Further, the site has not been identified as an oak woodland or wildlife corridor. On August 19, 2025, the City Council adopted Resolution No. RES-2025-140 making findings and adopting an Addendum to the Elm Tree Station Initial Study/Mitigated Negative Declaration for the Elm Tree Station project. The Addendum includes a discussion and analysis of biological impacts and mitigation measures that were adopted as part of the action taken by Council. Mitigation measures include purchase of mitigation credits for wetlands, California Tiger Salamander and special status plants, requirements for protections of nesting raptors and birds, as well as compliance with the City's Tree Ordinance. The mitigation measures do not include a requirement for low profile development. The draft Design Review resolution includes findings regarding compatibility with the character of the surrounding properties along N. Wright Road and the commercial and light industrial uses in the vicinity in compliance with the Santa Rosa Design Guidelines.

3. The project does not meet the design expectations for a key entry corridor into Santa Rosa.

Claim: Rather than forming a welcoming transition into the city, the proposed development presents a vehicle-oriented commercial use whose visual character is better suited to a highway frontage than to a neighborhood entry point. The project does not provide the kind of human-scaled architecture, landscaping, or massing that the General Plan envisions for key approach corridors, offering a vehicle-oriented commercial layout rather than a welcoming, human-scaled gateway consistent with the General Plan and Design Guidelines Section 3.3.

Response: With the City Council's approval of the Conditional Use Permit, the issue of land use, including the vehicle-oriented commercial use, is not before the DRPB for consideration. Further, the site is not zoned with the Gateway (-G) Combining District and is therefore not subject to Gateway Combining District Standards and Guidelines. The project was found by the Council to be consistent with the General Plan, and the findings in the draft Design Review resolution address compliance with the Santa Rosa Design Guidelines.

4. The overall architecture, massing, lighting, and materials reflect a conventional gas station/convenience store rather than a neighborhood market or context-

sensitive mixed-use development.

Claim: If the Board is to conclude that the use is a grocery rather than a prohibited convenience store, the design should clearly reflect that distinction. This may include limitations on interior and exterior lighting, elimination of neon or LED window signs, incorporating residential-scale design elements, or architectural features emphasizing local goods rather than vehicular quick-stop functions. Without such design elements, the project effectively abandons the neighborhood-serving market identity asserted in the application.

Response: With the City Council's approval of the Conditional Use Permit, the issue of land use, including the market, is not before the DRPB for consideration. There are no specific Zoning Code design standards or Design Guidelines recommendations to distinguish the difference between a grocery store and a convenience store. The findings in the draft Design Review resolution address compliance with the Santa Rosa Design Guidelines, and any proposed signs for the site will be required to comply with the City's Sign Ordinance.

5. The site plan creates conflicts between vehicles, pedestrians, and bicyclists using the Joe Rodota Trail.

Claim: Circulation design is also problematic. The ingress and egress points cross active pedestrian and bicycle routes, creating awkward vehicular turning movements at the trail edge. The design does not clearly prioritize pedestrian or non-motorized users, nor does it incorporate landscape or hardscape elements to slow traffic or define safe passage.

Response: The project's design related to circulation and the connection of the Joe Rodota Trail has been reviewed and approved by the City's Transportation and Public Works Department. Users of the Joe Rodota Trail that choose to travel onto the project site would travel south along the eastern boundary of the project site, to the southern project site boundary, which then leads to the sidewalk adjacent to the western project site boundary. The project's design of the pathway allows sufficient room for users of the pathway to access the sidewalk without crossing into any traffic lane. The connection to the Joe Rodota Trail was incorporated into the project as part of the 2013 approval for this site. The addition was in response to concerns identified at that time related to compatibility of the proposed project and the Trail. Pedestrians are common at fueling facilities, so their presence at this site would not be unexpected or uncommon. The bicycle path proposed around the south and east perimeter of the site would allow bicyclists to travel around the site and does not add conflict points to the path of travel. The Joe Rodota Trail runs adjacent to numerous other developments that generate similar levels of traffic so there is no basis for expecting this use to introduce hazards.

6. The placement of a residence directly above and adjacent to fuel dispensing operations raises unresolved design and compatibility issues.

Claim: A dwelling located immediately adjacent to, and overlooking, fuel dispensing operations raises questions about whether the architecture sufficiently buffers occupants from fumes, noise, and late-night commercial activity.

Response: With the City Council's approval of the Conditional Use Permit, the issue of land use, including the apartment unit, is not before the DRPB for consideration. Per the conditions of approval, the Project will be required to obtain building permits for the site work and for each structure, all of which will require compliance with the latest adopted codes, ordinances, resolution and policies, including those related to air quality and noise.

7. The project fails to clearly distinguish itself from a prohibited convenience store use.

Claim: The project's zoning, PD-0435, does not list convenience markets as a permitted use. The applicant describes the building as a "small grocery store," yet the architectural design, large storefront windows, grab-and-go layout, beverage refrigeration visible to the street, wall signage, illuminated canopy, bears a strong resemblance to a standard convenience store attached to a fueling station.

Response: With the City Council's approval of the Conditional Use Permit, the issue of land use, including the market, is not before the DRPB for consideration. There are no specific Zoning Code design standards or Design Guidelines recommendations to distinguish the difference between a grocery store and a convenience store.

The Zoning Code defines a Convenience Store and Grocery Store as followings:

Convenience Store. A type of general retail store which carries a range of merchandise oriented to convenience and/or travelers' shopping needs.

Grocery Store. A retail or wholesale store that primarily sells food, including canned and frozen foods, fresh fruits and vegetables, and fresh (raw) and prepared meats, fish, and poultry. Large stores are defined as 20,000 square feet in size or greater. Also includes a grocery store use located within a larger format retail store where an area 20,000 square feet in size or greater is primarily devoted to the sale of food. Small stores are defined as less than 20,000 square feet in size. Also includes a grocery store use located within a larger format retail store where an area less than 20,000 square feet in size is primarily devoted to the sale of food.

Based on the description provided by the applicant, staff's analysis concluded, and the Council confirmed through their approval, that the market use can be described as not specifically oriented to convenience and/or travelers' needs, as is required to be considered a convenience store. The project description does not include any references to traveler-oriented merchandise. Further, the market would not sell any alcohol or tobacco products and would include fresh food options, potentially including a deli counter. The findings in the draft Design Review resolution address compliance with the Santa Rosa Design Guidelines, and any proposed signs for the site will be required to comply with the City's Sign Ordinance.

8. Landscaping, screening, and driveway placement may reduce visibility and create avoidable safety hazards.

Claim: Tree placement and fencing along driveway exits may create future line-of-sight issues for drivers, especially at night, when canopy lighting and illuminated

signage could distract or impair visibility. Site line issues are particularly dangerous for non-motorized vehicles, pedestrians and bicyclists using the Joe Rodota trail, whose lives and safety are dependent on motorist visibility.

Response: The project's design related to the driveway locations and line-of-sight for vehicles has been reviewed and approved by the City's Transportation and Public Works Department. There are two driveways proposed for the Project, one in/out and one out only. Typically, gas stations need two driveways to accommodate the tanker trucks that enter and exit the site. The pathway proposed around the back of the site would minimize the number of potential conflicts for those going to or from the Joe Rodota Trail.

Additionally, the City, in conjunction with Sonoma County Regional Parks, is looking to add the missing link of the Joe Rodota Trail to the west of Wright Road, on the old railroad right-of-way. That project, in conjunction with crossing improvements, was vetted through the Fulton Road Interchange Feasibility Study and is included in the City's request for Sonoma County Transportation and Climate Authority Cycle 2 Go Sonoma funding.

[EXTERNAL] Elm Street Station Project

From Amy Jolly <amybjolly@gmail.com>

Date Wed 11/5/2025 9:12 AM

To _DRPB - Design Review and Preservation Board <DRPB@srcity.org>

Dear Members of the Design Review and Preservation Board,

Thank you for your time and service. I am writing to express concerns about the proposed Elm Tree Station project at 874 North Wright Road, and to respectfully urge the Board to carefully assess whether the project satisfies the findings required for Design Review approval under Santa Rosa City Code Section 20-52.030 and the City's Design Guidelines, particularly Section 3.3. This northwestern entry point into the city functions as a visual and experiential gateway, and any development here should enhance, not diminish, the character of the community. At present, the project does not appear to achieve a visually cohesive or contextually appropriate design.

The project does not meet the design expectations for a key entry corridor into Santa Rosa. Rather than forming a welcoming transition into the city, the proposed development presents a vehicle-oriented commercial use whose visual character is better suited to a highway frontage than to a neighborhood entry point. The project does not provide the kind of human-scaled architecture, landscaping, or massing that the General Plan envisions for key approach corridors, offering a vehicle-oriented commercial layout rather than a welcoming, human-scaled gateway consistent with the General Plan and Design Guidelines Section 3.3.

The overall architecture, massing, lighting, and materials reflect a conventional gas station/convenience store rather than a neighborhood market or context-sensitive mixed-use development. If the Board is to conclude that the use is a grocery rather than a prohibited convenience store, the design should clearly reflect that distinction. This may include limitations on interior and exterior lighting, elimination of neon or LED window signs, incorporating residential-scale design elements, or architectural features emphasizing local goods rather than vehicular quick-stop functions. Without such design elements, the project effectively abandons the neighborhood-serving market identity asserted in the application.

The site plan creates conflicts between vehicles, pedestrians, and bicyclists using the Joe Rodota Trail. Circulation design is also problematic. The ingress and egress points cross active pedestrian and bicycle routes, creating awkward vehicular turning movements at the trail edge. The design does not clearly prioritize pedestrian or non-motorized users, nor does it incorporate landscape or hardscape elements to slow traffic or define safe passage.

The placement of a residence directly above and adjacent to fuel dispensing operations raises unresolved design and compatibility issues. A dwelling located immediately adjacent to, and overlooking, fuel dispensing operations raises questions about whether the architecture sufficiently buffers occupants from fumes, noise, and late-night commercial activity.

The project fails to clearly distinguish itself from a prohibited convenience store use. The project's zoning, PD-0435, does not list convenience markets as a permitted use. The applicant describes the building as a "small grocery store," yet the architectural design, large storefront windows, grab-and-go layout, beverage refrigeration visible to the street, wall signage, illuminated canopy, bears a strong resemblance to a standard convenience store attached to a fueling station.

Landscaping, screening, and driveway placement may reduce visibility and create avoidable safety hazards. Tree placement and fencing along driveway exits may create future line-of-sight issues for drivers, especially at night, when canopy lighting and illuminated signage could distract or impair visibility. Site line issues are particularly dangerous for non-motorized vehicles, pedestrians and bicyclists using the Joe Rodota trail, whose lives and safety are dependent on motorist visibility.

Because these design and compatibility issues remain unresolved, the required Design Review findings, particularly those related to site planning, aesthetic quality, compatibility with surroundings, and absence of detriment to public welfare, cannot be confidently made.

Thank you for your careful consideration.

In Joy

Amy

"Do not be daunted by the enormity of the world's grief. You are not obligated to complete the work, but neither are you free to abandon it." The Talmud

[EXTERNAL] Agenda Item 9.1 Public Hearing – Gas Station – Design Review – 874 N. Wright Rd. – DR21-069

From Ariel Muirhead <arielmmuirhead@gmail.com>

Date Wed 11/5/2025 4:29 PM

To _DRPB - Design Review and Preservation Board <DRPB@srcity.org>

 1 attachment (65 KB)

Design Review and Preservation Board.pdf;

Dear Members of the Santa Rosa Design Review and Preservation Board,

I hope this message finds you well. Please find attached a letter I have submitted for the public record regarding the proposed gas station project. As a nearby resident and health professional, I am deeply concerned about the potential impact of fuel leaks or spills on our local groundwater wells, including my own, which is less than a quarter mile from the proposed site.

In the letter, I outline my concerns about contamination risks and suggest possible mitigation measures—such as the use of above-ground storage tanks and enhanced spill prevention systems—to better protect our community's health and water quality.

Thank you very much for your time, attention, and service to our community. Please confirm that my attached letter will be included in the public record for this project.

Warm regards,

~Ariel Muirhead

Ariel Muirhead

Chico Ave
Santa Rosa, CA 95407
arielmmuirhead@gmail.com
11/5/2025

Santa Rosa Design Review and Preservation Board

City of Santa Rosa
100 Santa Rosa Avenue
Santa Rosa, CA 95404

Subject: Agenda Item 9.1 Public Hearing – Gas Station – Design Review – 874 N. Wright Rd. – DR21-069

Dear Members of the Design Review and Preservation Board,

I am writing as a concerned resident who lives less than a quarter mile from the site of the proposed gas station project. My property relies on a private well for water, as do several of my neighbors. Because of our dependence on groundwater, I am deeply concerned about the potential for fuel leaks, spills, or runoff that could contaminate our wells and the surrounding aquifer.

As a health professional, I am particularly concerned about the potential impact on my neighbors—many of whom are also my patients—who are already managing chronic health conditions. Safe, clean water is foundational to health, and any contamination of our shared groundwater would pose serious risks to vulnerable members of our community.

While I understand that underground storage tanks (USTs) are common for fuel stations, history has shown that leaks can and do occur, sometimes going undetected for years. For this reason, I urge the Board and the project developers to consider **above-ground storage tanks (ASTs)** as a safer alternative. ASTs allow for easier inspection, maintenance, and immediate detection of any leaks, offering greater protection for nearby wells and for the community's health.

Additionally, I ask the Board to explore whether **enhanced safeguards** could be required at the fueling area to reduce routine spillage and exposure risks, including:

- **Automatic shutoff valves or drip containment systems** to prevent spillage when customers “top off” their tanks or return the nozzle.
- **Improved drainage or containment systems** around fueling areas to capture any drips before they reach soil or groundwater.

- **Routine maintenance and inspection reporting** to ensure compliance and timely mitigation if an issue arises.

As a resident, a well owner, and a health professional, I urge the Board to adopt the highest possible environmental and public health protections before approving this project. A proactive approach now will help safeguard our water, our environment, and our community's well-being for years to come.

Thank you for your time, attention, and commitment to responsible development in our city. Please include this letter in the public record for the proposed project.

Warmly,

~Ariel Muirhead, RD

Concerned Resident, Well Owner, and Health Professional

From: [Conrad Larkin](#)
To: [DRPB - Design Review and Preservation Board](#)
Cc: [Jones-Carter, Melanie](#); [Parker Sharron, Adam](#); [Fagent, Drew](#); [Weigl, Drew](#); [Anderson, Ingrid](#); [Schwartz, Mike](#); [Ennis, Sher](#); [Toomians, Kristinae](#); [Reynolds, Jack](#); [McKay, Conor](#)
Subject: [EXTERNAL] Public Comment – Opposition to Elm Tree Station (DR21-069)
Date: Tuesday, November 4, 2025 9:53:56 PM

Design Review and Preservation Board – November 6, 2025

Project: Elm Tree Station – 874 N. Wright Road

Dear Chair and Members of the Board,

I am speaking in opposition to the proposed Elm Tree Station project. While I recognize the effort to incorporate mixed-use and park elements, the overall project is **incompatible with the City's current environmental, neighborhood, and climate goals**, and presents several concerns:

1. Inconsistent with Climate and Sustainability Goals

- The addition of a new **gas station** directly conflicts with the City of Santa Rosa's **Climate Action Plan** and California's transition away from fossil fuels.
 - Building new gasoline infrastructure in 2025, when the state is mandating the phase-out of new gas car sales by 2035, is **counter to long-term policy direction and community values**.
 - Even with four EV chargers, the project primarily promotes fossil fuel use rather than reducing it.
-

2. Environmental and Health Impacts

- The project site is adjacent to the **Joe Rodota Trail** and residential areas, exposing pedestrians and cyclists to **gasoline fumes, benzene, and noise pollution**.

- Locating a fuel station next to a public **park-like space with benches and picnic areas** is incompatible and may present **air quality and safety risks** for users.
 - The **Mitigated Negative Declaration from 2013** is outdated; environmental conditions, traffic, and air quality standards have changed significantly over the past decade. A full **Environmental Impact Report (EIR)** should be required under CEQA before approval.
-

3. Traffic and Safety Concerns

- Increased traffic from fueling, retail, and EV charging activity will worsen congestion along **North Wright Road**, which already serves as a connector for trail users and local residents.
 - Bicycle and pedestrian safety at this intersection must be prioritized — the **design appears to create conflict points** between vehicles entering/exiting the station and people using the new bike path.
-

4. Land Use Compatibility

- The proposed gas station use is **inconsistent with the surrounding semi-residential and recreational context**.
 - There are already multiple fueling stations within a short distance of this location; an additional one offers **little community benefit**.
 - The proposed “park” appears to be primarily a decorative buffer for the gas station rather than a genuine public amenity.
-

5. Request to the Board

For these reasons, I respectfully urge the Design Review and Preservation Board to **deny design approval** for the Elm Tree Station project or require substantial redesign that eliminates the gas station component.

Santa Rosa should be investing in clean transportation infrastructure, not expanding outdated fossil fuel facilities.

Thank you for your consideration.

Sincerely,

Conrad & Lynn Larkin

City of Santa Rosa resident and concerned community members

[EXTERNAL] Elm Tree station

From Conrad Larkin <conradlcs@gmail.com>

Date Wed 11/5/2025 4:12 PM

To _DRPB - Design Review and Preservation Board <DRPB@srcity.org>

One of my main objections to this proposal is that The street was not designed to handle the traffic that is likely to go in and out of that location right beside a propane supplier Blue Star Gas. I live in the neighborhood. Long lines of vehicles turning left off Hwy 12 onto Wright Rd. are backed up waiting to make a left turn on sebastopol Rd. often pass the proposed entrance to the station. This will also interfere with the movement of bicycles going down wright Rd. to connect with the Joe Rodoto Trail.

Thank you for this consideration.

Conrad Larkin

[EXTERNAL] Item 9.1 Public Hearing - Elm Tree Station - Design Review - 874 N. Wright Rd. - DR21-069

From Derek Knowles <derekclindenknowles@gmail.com>

Date Wed 11/5/2025 4:58 PM

To _DRPB - Design Review and Preservation Board <DRPB@srcity.org>

Cc Jones-Carter, Melanie <mjones-carter@srcity.org>; Parker Sharron, Adam <ASharron@srcity.org>; Fagent, Drew <DFagent@srcity.org>; Weigl, Drew <dweigl@srcity.org>; Anderson, Ingrid <IAnderson1@srcity.org>; Schwartz, Mike <MSchwartz@srcity.org>; Ennis, Sher <SEnnis@srcity.org>; Toomians, Kristinae <KToomians@srcity.org>; Reynolds, Jack <jareynolds@srcity.org>; McKay, Conor <CTMcKay@srcity.org>

Dear Chair Jones-Carter, Vice Chair Sharron, and DRPB Members,

I live in the Junior College neighborhood of Santa Rosa and am writing to express my sincere concerns about the proposed Elm Tree Station project.

In particular, and especially as a new parent, I am deeply worried about a new development that calls for the number of fuel pumps that this proposal does. During a time of undeniable climate crisis and warming temperatures brought upon by outsized use of fossil fuels, re-investing in fossil fuel architecture only serves to worsen the crisis and build up the debt that with which our children will ultimately be burdened.

In that vein, I was heartened to see that the proposal did call for some EV charging stations, and would like to encourage that this Board consider adding more charging stations to the proposal, while eliminating, ideally altogether, more fuel pumps.

Doing so would signal that Santa Rosa is serious about meeting its climate goals and send a message to our present and future communities that we care about ensuring a habitable and healthy environment.

Thank you for your consideration in this crucial local issue.

Sincerely,
Derek Knowles
719 King St.

--

Derek Knowles
[310.279.7507](tel:310.279.7507)
derekknowles.com

[EXTERNAL] Public Comment Agenda Item 9.1 Elm Street Station

From Eris Weaver <eris@bikesonoma.org>

Date Wed 11/5/2025 12:34 PM

To _DRPB - Design Review and Preservation Board <DRPB@srcity.org>

Cc McKay, Conor <CTMcKay@srcity.org>

Dear Board Members:

The plans for the Elm Street Station claim the project is “designed and intended to serve a wide variety of transit types: pedestrians, bicyclists, electric vehicles and traditional gasoline vehicles” but I don’t see much in the way of improvement from a cyclist point of view. In fact, I see a serious problem.

The small extension of the Joe Rodota Trail around the site still requires cyclists to cross the Blue Star Gas driveway, so that isn’t much of an improvement. The design seems to only think about cyclists who are using the JRT and not going anywhere else! I am very concerned that the addition of three driveways (two in and one out) to the already existing BSG driveway will create additional points of conflict for pedestrians and cyclists traveling north on N. Wright Road/Fulton Road. That is a LOT of driveways in a very short stretch of street!

The PD 0435 guideline for Design Criteria and Site Planning states that driveway approaches shall be minimized, shared driveways encouraged, and parking lots shall be interconnected among parcels. The project’s current design is not compliant. The applicant needs to reduce/consolidate the number of driveways to avoid adding to the City’s pedestrian and cyclist collision statistics.

Sincerely,

Eris Weaver



Eris Weaver, Executive Director
Sonoma County Bicycle Coalition
eris@bikesonoma.org
707-545-0153 office • 707-338-8589
cell
www.bikesonoma.org
[Book time to meet with me](#)



[Make a tax-deductible donation](#)

[EXTERNAL] Re: Elm Tree Station Review

From Holly J Pierce <rh Pierce@sonic.net>

Date Wed 11/5/2025 12:58 PM

To _DRPB - Design Review and Preservation Board <DRPB@srcity.org>

To Santa Rosa's Design Review Board,

I live near the proposed site for Elm Tree Station and understand that you plan to examine the design plans for it tomorrow evening. I have some concerns about that development that I'd like to share with you.

I know that the intersection between Highway 12 and Wright Road is considered a "gateway" to Santa Rosa for people driving in from Sebastopol and areas west. Because of this, it will be important that Elm Tree Station appears attractive and well maintained.

I am worried, though, that this property may eventually lose its appeal. I am including two photos, one of MD Market on nearby Sebastopol Road, and the other of MD Gas & Food in Guerneville. If these two properties are any indication of what can be expected regarding Elm Tree's appearance and upkeep, I am worried.

Is there any guarantee that this property won't become similarly rundown? What can you do to make sure this doesn't happen? Please check the plans carefully—and *brown*? Can't we use a more up-to-date color scheme here?

Thank you, and sorry this is late,

Holly Pierce
2346 Providence Court
Santa Rosa, CA 95401



Sebastopol Road



Guerneville

[EXTERNAL] Regarding Public Hearing 9.1 Design Review Issues for Proposed Gas Station at 874 Wright Road in Santa Rosa

From Jeff Rooney <jrooneymt@gmail.com>

Date Wed 11/5/2025 3:49 PM

To _DRPB - Design Review and Preservation Board <DRPB@srcity.org>; McKay, Conor <CTMcKay@srcity.org>

 1 attachment (260 KB)

CONGAS Letter - Agenda Item 9.1 - 874 N. Wright Rd. - DR21-069.pdf;

Dear Chair Jones-Carter, Vice Chair Sharron, and DRPB Members,

I am a resident in Santa Rosa and live on Fulton Rd in Sequoia Gardens near where this proposed gas station would be located. I am opposed to this proposition for a number of reasons. Firstly, that it will likely be a major congestion factor especially in the turn lane at Hwy 12 toward 101 that is already terrible during rush hours. So just thinking about general design issues for flow of the city traffic that is a big flaw. Secondly, I live on the side of town facing the Laguna de Santa Rosa, a delicate area watershed with a high water table that is sensitive to contamination. This gas station is within that range and given the propensity for contamination hazards with gas stations is another reason why I oppose it.

However I know your job is to review many design details relating to efficacy of this specific proposed gas station/grocery store and single residency. As a member of Coalition Opposing New Gas Stations our lead coordinator has written a letter to you all elaborating two succinct design issues for consideration. I want to acknowledge my endorsement of this letter to your board and have it attached for your records in this hearing and design review.

My thanks to you all in taking time to look deeply into this proposed gas station from your specific perspectives.

Warm regards,

Jeff Rooney
44 Sequoia Circle
Santa Rosa, CA 95401
707-480-6678

From: [Jenny Blaker](#)
To: [DRPB - Design Review and Preservation Board](#); [Jones-Carter, Melanie](#); [Parker Sharron, Adam](#); [Fagent, Drew](#); [Weigl, Drew](#); [Anderson, Ingrid](#); [Schwartz, Mike](#); [Ennis, Sher](#)
Cc: [Toomians, Kristinae](#); [Reynolds, Jack](#); [McKay, Conor](#)
Subject: [EXTERNAL] Design Review, 11/6/25: Item 9.1, 874 N. Wright Road, DR21-069
Date: Wednesday, November 5, 2025 2:49:56 PM
Attachments: [Resolution Denying CUP for 874NWR 4-10-25.pdf](#)

To: Santa Rosa Design Review & Preservation Board

November 6, 2025: Agenda Item 9.1 Design Review, 874 N. Wright Road, DR21-069

Dear Design Review and Preservation Board,

I believe that the Board has been placed in a difficult, in fact untenable, position regarding the decision before you today, and that there is further information about the context for this project which Board members should be privy to.

As you can see from the extensive history outlined in the Staff Report, this highly controversial project has been in the pipeline for almost two decades, with multiple rejections and appeals.

On April 10, 2025, the Planning Commission voted unanimously to reject the CUP and the addendum to the 2013 MND, based on well-considered information and after extensive public input. This PC resolution, which is not in your agenda packet, is attached.

The developers appealed the PC decision, which was overturned 3:2 by the City Council after a lengthy public hearing. While two Council members voted to support the PC's decision, three of the City Council members stated that their "ethical" decision to overturn it was based on prior "promises" to the developers. What were these promises, when were they made, by whom and to whom? The fact that the developers have persisted with their application for almost two decades, despite rejections and opposition, should be no reason for anyone to feel obliged to approve it now.

Over the past few years, there has been massive public opposition to this project. A coalition of over 20 organizations representing thousands of Sonoma County residents have submitted letters, emails, spoken at meetings, and participated in on-site protests. Local neighbors, who will be directly impacted by the project, have attended meetings and written letters enumerating their legitimate health and safety concerns. These include the potential impacts to their wells from contamination of the water supply and increased traffic safety concerns due to additional ingress and egress from and to the gas station, especially for children at the Wright Charter School. Local residents have stated that the last thing this area needs is a new gas station, and that there is already an abundance of local convenience stores. Twenty Sonoma County health professionals submitted a letter listing their concerns about potential health impacts to local residents from contaminated water supplies. Four local cycling organizations objected to the proposals for a gas station adjacent to the Joe Rodota trail, and all rejected the notion put forward by the developers that a small park with picnic tables will be a welcome rest stop for cyclists on the trail. Cyclists are more concerned about potential traffic conflicts on and adjacent to the site.

The staff report makes two dubious statements about compatibility with the General Plan. One

is that the proposed project “*would establish basic services that will be needed...*” but there is no evidence that this facility is or will be needed. There are already more than 10 gas stations within 5 miles of the site and over 40 in Santa Rosa, and local residents point to an abundance of local convenience stores.

The second statement about compatibility with the General Plan rests on the claim to “*superior site and architectural design...to improve visual quality*” but while this is subjective, rarely do people stop to admire the design or aesthetics of a gas station and convenience store.

The Design Concept Narrative (in Attachment 3) suggests that the project “*promotes superior design by having the following design goals*”:

1. *Preserve the natural features of the site....* But how will the wetlands be preserved?
2. *enhance users’ experience of existing networks.* Not according to the cyclists who submitted comments unanimously opposing this project.
- 3, 4, 5, 6. *Advance the City’s alternative fuel goals, etc.* This is primarily a gas station, providing fossil fuels, in an area where there are already more than 10 gas stations within a 5 mile radius, and over 40 in Santa Rosa. This is not a fossil fuel desert! While adding EV charging is a gesture toward using alternative energy sources, a gas station is not the most ideal location for EV chargers. It makes more sense to install EV chargers where people already live, work, and spend time – at home, at work, at shopping centers, health centers, theaters. Who wants to sit in their EV or even on a nearby park bench, breathing in the fumes from a gas station while waiting for their EV to charge? And as for the variety of transportation types, yet again the cyclists don’t agree, and this project goes no way towards promoting public transportation, community shuttle buses, or anything of that kind. It is a gas station after all.

Meanwhile, there are multiple pages of conflicts with the General Plan, from numerous angles!

Regarding the location, the staff report describes the area to the east of the site as “vacant” but fails to mention that it is zoned for multi-family housing, R-3-18. The lot split (Subdivision Committee, December 12, 2019) created nothing more than a paper buffer between the proposed gas station and the site zoned for residential uses.

The site is a wetland as designated by the Army Corps of Engineers, and it floods in winter. In winter the underground fuel tanks will be submerged.

The site is adjacent to a “fuel dealer” - which supplies propane for fueling vehicles. Having two facilities with massive containers for flammable fuels immediately adjacent to one another and close to residential areas is a cause for concern, especially considering the tankers etc. that will be accessing the sites to refill the tanks.

The question of the public health, safety and welfare has been glossed over but there is ample evidence, that was provided numerous times to the Planning Commission and City Council, of [serious health impacts caused by leaks and spills from gas pumps and from leaking underground storage tanks and environmental contamination of soil, surface water and underground aquifers](#). In addition, there are concerns about the ingress and egress to and from

the gas station on an already busy and dangerous road where there have been crashes including at least one fatality. And there is the proximity to the propane fueling facility immediately adjacent to the site.

There is also the zoning question of a neighborhood market vs a convenience store in a PD0435 zoning district. The developer owns a small chain of convenience stores, “MD Liquor & Foods” which are located throughout Sonoma County, stocking primarily alcohol, tobacco products and fast food snacks, so it would be interesting to compare what this project promises with his existing businesses. The developers have claimed that this will be a “fresh food market” with no liquor license applied for, but it appears to be a regular convenience store and a liquor license can be applied for at a later date.

Lastly, there is a concern about the future clean up costs when the gas station eventually closes down, especially given that sales of gas are declining, and new gas stations are built to last for 40 years or more. Although owners are theoretically required to pay cleanup costs, abandoned gas stations often end up becoming stranded assets and a liability for the City – at tax payers expense.

I believe the DRPB has been placed in an awkward and untenable position. You have been asked to ignore the important major issues listed above to focus on design and aesthetics. I don’t like the phrase “putting lipstick on a pig,” but it seems to me that the Board is being asked to choose the color of the pig’s lipstick, its eyebrow lines, its mascara, its nose-rings and earrings, without being asked to look at whether it should be allowed here at all.

Thank you for your service and for giving serious consideration to the well-being of the constituents on whose behalf you will be making an important decision.

Sincerely

Jenny Blaker

RE: [EXTERNAL] Can public comment via zoom?

From Jones, Jessica <jjones@srcity.org>

Date Wed 11/5/2025 11:52 AM

To junescp@gmail.com <junescp@gmail.com>

Cc _DRPB - Design Review and Preservation Board <DRPB@srcity.org>

 1 attachment (1 MB)

Postcard.pdf;

Hello and thank you for your e-mail. As noted on the [meeting agenda](#) and the public hearing notice (attached), public comments will be accepted **in person only** during the public meeting. While the public can watch the meeting on Zoom, comments will not be accepted via Zoom. Also, to answer your question, there will be no Board members participating via Zoom.

Thank you,
Jessica

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



From: J. <junescp@gmail.com>

Sent: Tuesday, November 4, 2025 3:31 PM

To: _DRPB - Design Review and Preservation Board <DRPB@srcity.org>

Subject: [EXTERNAL] Can public comment via zoom?

Hello DRPB ,
Will the public be able to make comments via zoom for this Thursday's (11/6) meeting?
Will any Board Member be participating remotely? (thereby causing the Board to also allow for the public to comment through the zoom link)
Please let me know.
Thank you.

November 5, 2025

Santa Rosa Design Review and Preservation Board
100 Santa Rosa Avenue - Santa Rosa, CA 95404
Via Email: drpb@srcity.org

Subject: Agenda Item 9.1 Public Hearing – ELM TREE STATION PROJECT, 874 N WRIGHT ROAD, FILE NO. DR21-069 (PRJ21-033)

Dear Design Review and Preservation Board,

The proposed Elm Tree Station Project as currently designed has issues that need to be addressed as it does not meet the standards of the findings required for Design Review approval under Santa Rosa City Code [Section 20-52.030](#).

1. Design alterations are needed to protect the residential unit tenant:

The inclusion of a gas station on the same site as a residence creates design considerations that must be addressed. Measures must be taken to protect residents from the toxics of gasoline that impact human health. Without significant architectural mitigation and design changes, or removal of either the residence or removal of the fueling facility, the Board would not be able to make the required finding that the project “will provide a desirable environment for its occupants” and “will not be detrimental to the public health, safety, or welfare.”

The Santa Rosa Zoning Code [§ 20-42.090](#), subdivision (A) Design considerations, states that a mixed-use project’s “design shall provide for internal compatibility between the different uses” and that “[p]otential noise, hours of operation, odors, glare, pedestrian traffic, and other potentially significant impacts on residents shall be minimized.” The current design has failed to provide this. Not only does the design not include necessary elements to insulate the tenant from gasoline vapors, odors and other potentially significant impacts, it has an open-air deck, and that deck that could be designed to face east is currently designed to face the fueling lot. It needs to be re-designed.

Peer-reviewed scientific studies link gas station operations to elevated cancer and respiratory risks, especially within 300 meters of fueling; studies show gas stations emit

more benzene and other toxics than previously recognized, with no safe level of exposure¹.

The current plans are missing the design elements that are needed to protect the tenant from the dangers of the fueling facility. Risks include vapor intrusion. Petrol vapors can get inside the residential unit. The project needs to be evaluated as to whether it has *an adequate Vapor Intrusion Mitigation System Design*.²

The current overall design does not provide a desirable environment for the residence, needs to prescribe the appropriate use of materials necessary to prevent intrusion and provide HVAC specification for healthy indoor air quality,

The project site's CalEnviroScreen percentile rankings, local asthma and groundwater threat scores place it among the City's most environmentally vulnerable areas under the City's own Active Transportation Plan Existing Conditions Report. These environmental justice and health vulnerability indicators heighten the risks to the residents and emphasize the importance of requiring the design measures that are available for safety.

2. Changes are needed to comply with PD 0435 Design Criteria

The PD 0435 guideline for Design Criteria and Site Planning states that driveway approaches shall be minimized, shared driveways encouraged, and parking lots shall be interconnected among parcels.³ The project's current design is not compliant. The design does not share a driveway with the adjoining Blue Star Gas (BSG). In addition, the project has an extra egress driveway beyond what is necessary for accessing and exiting the site. The project's site plan has two access driveways: the north for egress only and the south for both ingress and egress. Also the project isn't designed to have any interconnected parking lot with BSG's parking lot. BSG has its parking lot and driveway at the north end of its parcel, adjacent to the project, so it would be feasible for

¹ See, e.g., Columbia University, Mailman School of Public Health, Gas Stations Vent Far More Toxic Fumes Than Previously Thought, dated October 4, 2018, available at:

see also NIH, Benzene emissions from gas station clusters: a new framework for estimating lifetime cancer risk, dated Jan. 7, 2021, available at:

See also Benzene releases from gasoline stations - Implications for human health

[² \[https://vim-1.itrcweb.org/wp-content/uploads/2021/01/1-Design-Considerations-VIMT_Design_Checklist-Final.pdf\]\(https://vim-1.itrcweb.org/wp-content/uploads/2021/01/1-Design-Considerations-VIMT_Design_Checklist-Final.pdf\)](https://www.canada.ca/en/health-canada/services/publications/healthy-living/benzene-releases-gasoline-stations-implications-human-health.html</p></div><div data-bbox=)

³ [Attachment 8 - PD 0435](#), pages 5 - 6 (Policy Statement pages 2 - 3).

the project to be designed to share a driveway and interconnect the parking lot with BSG's parking lot.

The project's current design layout would require pedestrians and cyclists to cross more driveways than necessary, creating extra conflict zones as identified in the City's own Vision Zero Action Plan. A Wright Charter Elementary School student who lives north of Hwy 12 traveling by bicycle home would cross in front of those additional driveways. These hazards are inconsistent with the City's stated objective of providing safe, comfortable, and protected active transportation facilities. The collision history in the project vicinity has worsened since 2013 and collisions included at least one fatality in the area in recent years. The project design needs to reduce the number of driveways and minimize its potential to cause traffic safety impacts.

3. A Visual analysis is needed

The project site is at a significant location as it is at the western entry point to the city and needs to be aesthetically appealing. The proposed layout for the landscaping, screens and trees on the site have implications for both aesthetics and the visibility line of site needed for traffic safety. A visual analysis in compliance with Section [20-50.100](#) is needed to provide an understanding of how the proposed structures, landscaping and related site alteration will appear in the context of the site and surrounding properties and development.

4. Design needs to address lighting safety

The design plans for the lighting needs to address specifications related to safety. Gas station lighting can present fire hazards and be the cause of explosions. See <https://www.ledlightexpert.com/hazardous-location-lighting-safety-oil-facilities>

5. Design should include solar panels on store roof

There should be much more solar included in the project design. The whole area of the store roof is void of solar panels. While the project has some limited solar panels elsewhere on the site and EV charging as greenhouse gas ("GHG") reduction measures, they are only a negligible offset compared to the lifecycle emissions from the project's plans for fossil fuel sales and do not mitigate the long-term lock-in of fossil fuel infrastructure or the cumulative climate impact of continued gasoline sales that undermine the City's Climate Emergency Resolution and the state's 2045 decarbonization goals.⁴

⁴ California decarbonization law:

<https://archive.gov.ca.gov/archive/gov39/wp-content/uploads/2018/09/9.10.18-Executive-Order.pdf>.

To aim for alignment with government policies and superior quality, the project should do more to increase the onsite generation of solar electricity that will be needed to power the operations and the EV charging without burdening the electrical grid. The design plans should be required to include the addition of solar panels covering over a majority of the area of the store roof.

Thank you for your consideration,

June Brashares
95472

[EXTERNAL] Agenda Item 9.1 Public Hearing – Gas Station – Design Review – 874 N. Wright Rd. – DR21-069

From Laurel Chambers <lachambers84@gmail.com>

Date Wed 11/5/2025 4:45 PM

To _DRPB - Design Review and Preservation Board <DRPB@srcity.org>

Cc McKay, Conor <CTMcKay@srcity.org>

Good afternoon,

I live near the gas station project at 874 N.. Wright Rd. and I have several concerns that I would like to see addressed with the development.

1. Underground storage tanks have a high likelihood of leaking and with the water table so high in that area, I am very concerned about water contamination. My children go to Wright Elementary School and the school is on well water. I would like to see the storage tanks be above ground.
2. I am concerned that this gas station and "park" will be a magnet for the unhoused population and residents of Sam Jones Hall, who already congregate in the area. We do not need more places for loitering and drug use. Will the property owner provide security, especially at night? Will there be a complaint number that neighbors can call to alert the property owner of issues?
3. If vehicles are allowed to make a left turn into the parking lot, I am concerned that it will impact traffic at the intersection of S. Wright and Hwy 12. Prohibiting left turns into the parking lot would be best, but at the very least, it needs a traffic study.
4. I am concerned about the increased traffic and vehicles entering/exiting the driveway during peak hours. Please require that deliveries not be made during times that children will be going to/from school.
5. Will food trucks or recycling vendors be allowed to use the parking lot? I am strongly against this, due to traffic and loitering concerns.
6. Will the dumpsters be out in the open? Please require an enclosure so they are not an eyesore.

Thank you for your consideration,

Laurel Chambers
San Sebastian Ave.

[EXTERNAL] Agenda Item 9.1 Public Hearing – Gas Station – Design Review – 874 N. Wright Rd. – DR21-069

From Rue <rmf@sonic.net>

Date Wed 11/5/2025 7:07 PM

To _DRPB - Design Review and Preservation Board <DRPB@srcity.org>

Cc McKay, Conor <CTMcKay@srcity.org>

Dear Chair Jones-Carter, Vice Chair Sharron, and DRPB Members,

Lighting Specifications:

The design plans for the lighting must address specifications related to safety as well as visual impacts. Gas station lighting can present fire hazards and sometimes be the cause of explosions. The wrong lighting, or faulty lighting, can create sparks or ignite fires in other ways. See <https://www.ledlightexpert.com/hazardous-location-lighting-safety-oil-facilities> and <https://www.paclights.com/learning-center/lighting-qa-gas-station-canopy-lighting/>.

Thank you for your thoughtful consideration of all the impacts of this new facility.

Rue Furch



Board of Directors

Neal Fishman, President
Michael Allen, Chair
Janis Watkins,
Secretary/Treasurer
Anne Seeley
Eric Vazquez-Izaguirre
Miles Dillingham
Brigette Mansell
Susan Shaw
Annie Dobbs-Kramer

Executive Director

Una Glass

Political Director

Matthew Callaway

Dear Members of the Design Review and Preservation Board,

Thank you for your time and service. I am writing to express concerns about the proposed Elm Tree Station project at 874 North Wright Road, and to respectfully urge the Board to carefully assess whether the project satisfies the findings required for Design Review approval under Santa Rosa City Code Section 20-52.030 and the City's Design Guidelines, particularly Section 3.3.

The DRPB's role is not to evaluate broader economic or climate policy, but to consider whether the location, design, site plan configuration, architectural elements, and overall appearance of the project are appropriate for the surrounding area and consistent with the General Plan, applicable specific plans, PD-0435 zoning requirements, and the City's adopted Design Guidelines. This northwestern entry point into the city functions as a visual and experiential gateway, and any development here should enhance, not diminish, the character of the community.

At present, the project does not appear to achieve a visually cohesive or contextually appropriate design. The site layout is dominated by fuel canopy structures, expansive paved areas, and driveway openings that interrupt pedestrian and bicycle circulation along the Joe Rodota Trail. Rather than forming a welcoming transition into the city, the proposed development presents a vehicle-oriented commercial use whose visual character is better suited to a highway frontage than to a neighborhood entry point. The project does not provide the kind of human-scaled architecture, landscaping, or massing that the General Plan envisions for key approach corridors. The relationship between buildings, canopy, signage, lighting, and open areas appears more functional than thoughtfully designed.

The placement of a residence above the market introduces additional design concerns. A dwelling located immediately adjacent to, and overlooking, fuel dispensing operations raises questions about whether the architecture sufficiently buffers occupants from fumes, noise, and late-night commercial activity. While health issues fall outside DRPB's authority, the physical design, including window placement, ventilation, material selection, vapor barriers, and sound insulation, directly affects whether this residential unit can be considered compatible with the rest of the site. Without significant architectural mitigation, it is difficult to see how the Board could make the required finding that the project provides a safe, desirable, and well-designed living environment.

Circulation design is also problematic. The ingress and egress points cross active pedestrian and bicycle routes, creating awkward vehicular turning movements at the trail edge. The design does not clearly prioritize pedestrian or non-motorized users, nor does it incorporate landscape or hardscape elements to slow traffic or define safe passage. These site configuration choices affect the quality of public space, and are squarely within the DRPB's review scope.

Landscaping and screening choices contribute to additional uncertainty. Tree placement and fencing along driveway exits may create future line-of-sight issues for drivers, especially at night, when canopy lighting and illuminated signage could distract or impair visibility. The current landscape plan appears focused on meeting minimum planting requirements rather than creating an aesthetically cohesive environment or reinforcing the site's gateway function.

The project's zoning, PD-0435, does not list convenience markets as a permitted use. The applicant describes the building as a "small grocery store," yet the architectural design, large storefront windows, grab-and-go layout, beverage refrigeration visible to the street, wall signage, illuminated canopy, bears a strong resemblance to a standard convenience store attached to a fueling station. If the Board is to conclude that the use is a grocery rather than a prohibited convenience store, the design should clearly reflect that distinction. This may include limitations on interior and exterior lighting, elimination of neon or LED window signs, incorporating residential-scale design elements, or architectural features emphasizing local goods rather than vehicular quick-stop functions. Without such design elements, the project effectively abandons the neighborhood-serving market identity asserted in the application.

Finally, the Board must determine whether the project would be detrimental to the public health, safety, or welfare or materially injurious to nearby properties. Although CEQA and environmental regulation fall outside DRPB's direct authority, the physical design of a facility dispensing volatile fuels adjacent to a public trail, residential zoning, and outdoor gathering areas raises legitimate questions about whether modifications should be required to ensure safety in terms of circulation, ventilation, emergency access, building separation, lighting spillover, and pedestrian refuge spaces. These are fundamentally design-related issues and fall within your purview.

For all of these reasons, insufficient architectural character for a city entryway, unresolved conflicts between residential and fueling components, lack of pedestrian-sensitive site planning, uncertain compliance with PD-0435's prohibition on convenience stores, and a design that does not fully support required findings, I respectfully request that the DRPB not approve the project as currently designed. Instead, I urge you to require a substantial redesign to ensure the project contributes positively to the built environment and meets the standards outlined in the City's Design Guidelines and General Plan.

Summary of Key Reasons the DRPB Should Withhold Approval

- **The project does not meet the design expectations for a key entry corridor into Santa Rosa**, offering a vehicle-oriented commercial layout rather than a welcoming, human-scaled gateway consistent with the General Plan and Design Guidelines Section 3.3.
- **The overall architecture, massing, lighting, and materials reflect a conventional gas station/convenience store rather than a neighborhood market or context-sensitive mixed-use development**, undermining visual compatibility with surrounding properties.
- **The site plan creates conflicts between vehicles, pedestrians, and bicyclists using the Joe Rodota Trail**, and lacks design features that prioritize safe circulation or pedestrian comfort.
- **The placement of a residence directly above and adjacent to fuel dispensing operations raises unresolved design and compatibility issues**, including ventilation, noise, lighting, and occupant protection, matters directly related to building layout and architectural design.
- **The project fails to clearly distinguish itself from a prohibited convenience store use under PD-0435**, and the design elements (bright signage, display windows, circulation pattern, canopy lighting) reinforce a convenience store identity rather than a small grocery as claimed.
- **Landscaping, screening, and driveway placement may reduce visibility and create avoidable safety hazards**, while also failing to enhance the visual character of the site in a meaningful way.
- **Because these design and compatibility issues remain unresolved, the required Design Review findings, particularly those related to site planning, aesthetic quality, compatibility with surroundings, and absence of detriment to public welfare, cannot be confidently made.**

Thank you for your careful consideration.
Sincerely,



Matthew Callaway,
SCCA Political Director

From: [Wendy Krupnick](#)
To: [DRPB - Design Review and Preservation Board](#)
Cc: [Toomians, Kristinae](#); [Reynolds, Jack](#); [McKay, Conor](#)
Subject: [EXTERNAL] Item 9.1 Public Hearing - Elm Tree Station - Design Review - 874 N. Wright Rd. - DR21-069
Date: Tuesday, November 4, 2025 9:17:51 PM

Santa Rosa Design Review Board members and staff,

I tried to send comments a couple of days ago but your designated public email address was not working. Today I became aware of the excellent comments submitted by Sonoma County Conservation Action, copied below.

I want to strongly endorse these comments as well as offering a couple of additional comments.

I am very concerned that several aspects of the Elm St. Station will be of great risk of impacting the public health, safety and welfare and is likely to be materially injurious to properties in the vicinity. **This site floods every winter.** The addition of buildings and impervious surfaces means the water will go into the street and neighborhood carrying toxic waste from the gas station and parking lots with it. To minimize these impacts, the developer should be required to minimize the footprints of the buildings, install permeable paving and extensive drains with capacity for "100 year" floods. A hydrologist engineer should be required to evaluate this site and determine where all that water will go. I do not believe that these concerns have been addressed in the current plan.

This site has been an oak woodland, wildlife corridor and floodplain. The current design is inconsistent and incompatible with the community character. Any development must have a low profile and protect these critical natural functions and appearance to the community.

Thank you for considering my comments.

Wendy Krupnick

Santa Rosa

Comments from Sonoma County Conservation Action which I endorse:

he DRPB's role is not to evaluate broader economic or climate policy, but to consider whether the location, design, site plan configuration, architectural elements, and overall appearance of the project are appropriate for the surrounding area and consistent with the General Plan, applicable specific plans, PD-0435 zoning requirements, and the City's adopted Design Guidelines. This northwestern entry point into the city functions as a visual and experiential gateway, and any development here should enhance, not diminish, the character of the community.

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These site configuration choices affect the quality of public space, and are squarely within the DRPB's review scope.

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The project's zoning, PD-0435, does not list convenience markets as a permitted use. The applicant describes the building as a "small grocery store," yet the architectural design, large storefront windows, grab-and-go layout, beverage refrigeration visible to the street, wall signage, illuminated canopy, bears a strong resemblance to a standard convenience store attached to a fueling station. If the Board is to conclude that the use is a grocery rather than a prohibited convenience store, the design should clearly reflect that distinction. This may include limitations on interior and exterior lighting, elimination of neon or LED window signs, incorporating residential-scale design elements, or architectural features emphasizing local goods rather than vehicular quick-stop functions. Without such design elements, the project effectively abandons the neighborhood-serving market identity asserted in the application.

Finally, the Board must determine whether the project would be detrimental to the public health, safety, or welfare or materially injurious to nearby properties. Although CEQA and environmental regulation fall outside DRPB's direct authority, the physical design of a facility dispensing volatile fuels adjacent to a public trail, residential zoning, and outdoor gathering areas raises legitimate questions about whether modifications should be required to ensure safety in terms of circulation, ventilation, emergency access, building separation, lighting spillover, and pedestrian refuge spaces. These are fundamentally design-related issues and fall within your purview.

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Summary of Key Reasons the DRPB Should Withhold Approval

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- **Landscaping, screening, and driveway placement may reduce visibility and create avoidable safety hazards**, while also failing to enhance the visual character of the site in a meaningful way.
- **Because these design and compatibility issues remain unresolved, the required Design Review**

findings, particularly those related to site planning, aesthetic quality, compatibility with surroundings, and absence of detriment to public welfare, cannot be confidently made.



November 5, 2025

Santa Rosa Design Review and Preservation Board
100 Santa Rosa Avenue - Santa Rosa, CA 95404
Via Email: drpb@srcity.org

Subject: Agenda Item 9.1 Public Hearing – Gas Station – Design Review – 874 N. Wright Rd. – DR21-069

Dear Chair Jones-Carter, Vice Chair Sharron, and DRPB Members,

I am writing on behalf of the Coalition Opposing New Gas Stations and its hundreds of supporters in Sonoma County. I urge you to take several things into consideration based on your authority stated in the DRPB Statement of Purpose: *“The Board is charged with considering the location, design, site plan configuration, and the overall effect of proposed projects upon surrounding properties and the City in general...”*

We are concerned that the project as designed imposes a new and costly burden on the City of Santa Rosa, impacting *“the City in general.”* DRPB cannot approve the design flaw of the placement of the fuel storage tanks underground. A major concern with the Underground Storage Tanks is the likelihood of hazardous fuel seeping into the soil and groundwater, and the inability to have immediate visual detection and repair of leaks and spills. Industry is moving to above-ground fuel storage tanks that reduce the risk of soil and groundwater contamination, and avoid the need for costly excavation and eventual subsurface site clean-up.

Underground storage tanks (USTs)

- In the years since 2013, when the environmental and design review for this project was conducted, new information about extensive problems of leaking USTs and risks of substantial importance shows the project will impose significant risk of soil and groundwater contamination.
- USTs are prone to leak, even with the latest technology. [EPA estimates](#) that about 225,000 brownfield sites in the United States are contaminated by petroleum, largely from leaking USTs at gas stations.
- A one-gallon spill of petroleum can contaminate over one million gallons of groundwater.¹
- Pipe fittings, valves, attachments, and other weak-points can come loose in unstable ground resulting from flooding and earthquakes.
- The project property is prone to flooding and earthquakes. The water table there is high so the leak would be catastrophic to the nearby wells in that high water table which are already at risk.
- The project’s location is in a census tract in the 96th percentile for groundwater threat ([CalEnviroScreen 4.0](#)). Why impose a new excessive risk of contamination of nearby residential water wells when above-ground tanks, which would be easier to monitor and catch leaks, are an option?

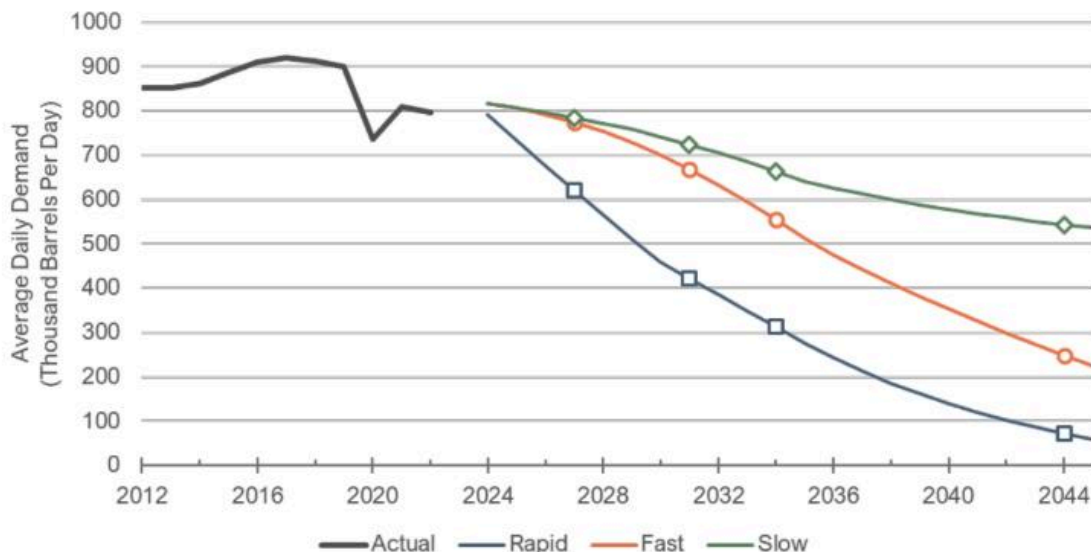
¹ <https://cultura.org/governing-the-gasoline-spigot/>



In addition, we are concerned that any gas station built in 2025 or after will only be in operation for a few years, far shorter than the developer may hope the gas station will be profitable. This is based on California Energy Commission (CEC) projections for gasoline sales demand reduction in the coming years (See CEC graph below) as well as other data modeling that also show similar projections.

Due to improved efficiency of gas-powered cars and the emergence and continuing growth in sales of plug-in hybrid gas/electric and fully electric vehicles (EVs), which now make up nearly 30% of new car sales in California, there is no reason to expect that gasoline sales will remain stable over time. In fact, the most likely scenario as the CEC calculates, is that gasoline sales will inexorably decline in the coming years and decades. Sonoma County has a relatively high rate of EV adoption, so it would be safe to assume that Sonoma County's demand decline may follow the "fast" or "rapid" demand decline path illustrated in the graph.

Figure ES- 1. Gasoline Consumption and Demand Scenarios Under Consideration for the Assessment



Santa Rosa has 44 gas stations. There are more than 10 in operation within a five-mile radius of this location. Being a newly built gas station without an existing clientele, it is likely that this station will only be competitive and profitable for a few short years.

It is well-documented by the think-tank Coltura and others that gas station owners frequently [abdicate their responsibility](#) to clean up their sites after their gas station closes due to the high cost of cleanup and remediation often required. Clean up of former gas stations often costs hundreds of thousands of dollars to remediate contaminated soil and groundwater. If and when a gas station owner abandons their property, it is the City of Santa Rosa and its taxpayers that are left holding the bag.



The growing global trend in gas station development is to use above-ground fuel storage tanks (ASTs) over traditional underground storage tanks (USTs) in consideration of the combination of economic, environmental, and safety factors.

We remain concerned about the many design flaws raised in previous venues by CONGAS and others. This includes placing a residence above the store onsite disregarding the need for protections for the resident's health, and the disregard to the safety of pedestrians and cyclists by the design of the two ingress/egress points that are also not in compliance with the design criteria of PD 0435 that prescribes that an existing one should be shared with the adjacent property.

Thank you for taking the above concerns into consideration.

Sincerely,

Woody Hastings,
Coordinator,
Coalition Opposing New Gas Stations