



February 21, 2024

VIA ELECTRONIC MAIL

Honorable Chair and Members  
City of Antioch Planning Commission  
City Hall, 200 "H" Street  
Antioch, CA 94509

**Re: Planning Commission Meeting of February 21, 2024  
Agenda Item #6-1 — Laurel Ranch Carwash (PRE2023-0006)**

Honorable Chair and Members of the Planning Commission:

As you may be aware, Davidon is the owner and developer of the Park Ridge residential subdivision, located immediately south of the parcel on which the above project is being proposed. We opposed the previous project on the site and submitted a letter dated February 15, 2023 (the "**2023 Letter**"), attached, expressing our concerns. The project now includes a convenience store and a carwash with vacuum stations. Removal of the gas station component of the project addresses some of the concerns described by the 2023 Letter, but many of our concerns remain. These concerns are detailed in the 2023 Letter and summarized as follows.

In addition to nuisance elements and health risks associated with the noise, traffic congestion, light and glare and air contaminants, the site itself has never been planned or designated for uses of this kind, and the site's size, configuration and traffic circulation make it a particularly poor choice for such uses. As the staff report notes, the site is currently zoned Low Density Residential, which does not allow commercial use. A general plan amendment, specific plan amendment and zoning change would be necessary before this project could be approved.

As raised in the 2023 Letter, residential uses surround proposed project. The proposed use will increase community air pollution because of emissions from vehicles queued waiting for the carwash, vacuum stations and parking spaces for the convenience store. Staff has recommended a reduction in the amount of parking provided, which might improve circulation but would increase the risk of cars idling while waiting for a parking spot, the car wash, or vacuum stations.

The significant noise and lighting impacts generated by activities at the site is another reason this proposed project is incompatible with adjacent residential uses. The car wash and vacuum station will result in disruptive noise as well as constant bright light and glare from the facility lighting and intermittent light flashing from the headlights of cars entering and exiting the site. Although staff proposes to reduce the number of vacuum stations so that they are not located immediately adjacent to the southern property line, relocating vacuum stations by that distance will have minimal effect on overall noise levels. Staff is correctly concerned that “vacuum locations adjacent to the residences along the southern property line will be a nuisance”. A landscaping buffer is inadequate to address the nuisance that vacuum stations on the site will create. Even during daytime hours, the relentless noise will severely degrade the quality of life for residents. Concentrating on work, studying, or simply enjoying the peace of one's home will all be severely impaired. Additionally, the carwash machinery, drying fans, customer vehicles and customers entering and exiting the convenience store, particularly late at night, will generate noise levels that will cause sleep disruption and associated health impacts. Residents will likely experience difficulty falling asleep and staying asleep due to the constant, loud noise, which will interfere with natural sleep cycles. The facility's constant, bright lighting will exacerbate the impacts of noise on the nighttime environment for residents, negatively impacting their quality of life. Long-term sleep deprivation can lead to severe health consequences. (Sleep Disorders and Sleep Deprivation: An Unmet Public Health Problem — Institute of Medicine (US) Committee on Sleep Medicine and Research; <https://www.ncbi.nlm.nih.gov/books/NBK19961/>).

The configuration of the site is unsuitable for use as a convenience store, car wash and vacuum stations. The parcel's narrow, triangular shape poses significant challenges for safe traffic circulation, adequate parking, and the avoidance of excessive vehicle idling. This also raises environmental concerns about increased localized air pollution directly adjacent to residential homes.

In short, the proposed uses are not allowable under the current general plan and zoning designations for the site; the site is not located, sized or configured in a way that is appropriate for a facility of this nature; the proposed plan for the site is inconsistent with numerous City code provisions designed to avoid the types of problems the uses present; and the applicant's proposed solutions are either impractical or ineffectual; and the uses will create health risks, noise, traffic, light and glare and other nuisance impacts on the adjacent residences.

Sincerely,



Steve Abbs

Encls.



February 14, 2023

VIA ELECTRONIC MAIL

Honorable Chair and Members  
City of Antioch Planning Commission  
City Hall, 200 "H" Street  
Antioch, CA 94509

**Re: Planning Commission Meeting of February 15, 2023  
Agenda Item 7.1 — Laurel Ranch Gas Station**

Honorable Chair and Members of the Planning Commission:

Davidon Homes is the owner and developer of the Park Ridge residential subdivision, located immediately south of the parcel on which the above project is being proposed. The project includes gasoline storage; dispensing facilities and a convenience store proposed to be operated 24 hours a day; and a carwash with ten vacuum stations proposed for operation from 6:00 a.m. to 10:00 p.m.

We write to express our deep concerns about the inappropriateness of siting such an intensive and intrusive use on this site directly adjacent to single-family homes. In addition to the obvious nuisance elements and health risks associated with the noise, traffic congestion, light and glare and toxic air contaminants, the site itself has never been planned or designated for uses of this kind, and the site's size, configuration and traffic circulation make it a particularly poor choice for such uses.

The site is a 1.35-acre, narrow triangular parcel at the southwest corner of Laurel Road and Country Hills Drive and is part of the Laurel Ranch residential development located north of that intersection. Although the staff report indicates this site is designated in the General Plan and East Lone Tree Specific Plan (ELTSP) as Community Retail (CN), we do not believe this is correct. While the original 1996 ELTSP identified the parcel at the southwest corner of Laurel Road and Country Hills Drive as CN, the Specific Plan was later amended several times to address revisions to the planned uses in this area and to the original Land Use and Circulation components of the Plan. These included moving the intersection of Country Hills Drive at Laurel Road to the west to maintain increased separation from Highway 4 freeway on- and off-ramps.

Attached are copies of the original and revised ELTSP Maps. The revised map shows the designation of this parcel as Low-Density Residential (RL). This change is also reflected on the 2016 Vesting Tentative Map for the Laurel Ranch subdivision, which shows the subject parcel as “C.3 Area — Parcel H,” and indicates its use as a bioretention facility for sheet flow from rooftops and paved areas (which the staff report also reflects). Because the uses proposed for this project are not permitted on land designated RL, a general plan amendment and zoning change would be necessary before this project could be approved.<sup>1</sup>

Such an approval would be wholly inconsistent with previous actions of the City Council over the past 45 years concerning the siting of gas stations adjacent to or near residential development. As the staff report reflects, the City Council has not approved a gas station adjacent to a residential use since the 1970s, and most of the gas stations that currently exist in the City adjacent to residential uses were built before 1970. In July of last year, the City Council denied a request to site a gas station, carwash and convenience store at 5200 Lone Tree Way bounded on two sides by single-family residential uses because of concerns about the incompatibility of such uses next to homes. The same decision would be appropriate here for the same reasons.

The most obvious reason not to site a gas station next to residential uses is the health risks posed by the toxic air contaminants that are generated by such a use.<sup>2</sup> In addition to the Park Ridge subdivision to the south and Laurel Ranch to the north, there is residential use on the west side of the proposed project. As the California Air Resources Board (CARB) has determined, gas station emissions significantly contribute to community air pollution because of the toxic components in gasoline as well as other toxic substances associated with such uses. These include emissions from fuel loading, fueling, spillage and hose permeation as well as emissions from vehicles queued waiting for available pumps, the carwash or vacuum stations.

It is unclear from the application what throughput of gasoline will occur on an annual basis from the twelve fueling stations proposed, but CARB recommends that gasoline

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<sup>1</sup> The environmental review for the proposed Laurel Ranch project was predicated on development of 180 dwelling units on the project site, together with associated uses, none of which would involve the routine transport, use, or disposal of hazardous materials, which precluded the possibility of creating the types of hazards to the public and the environment posed by this use.

<sup>2</sup> These include benzene, ethyl benzene, n-hexane, propylene (or propene), naphthalene, xylenes, and toluene. Benzene, a known carcinogen, is the most toxic component of gas station emissions. But other toxic substances in gasoline — including toluene, ethylbenzene, and xylene — also carry health risks including effects to the nervous system, cognitive impairment, hearing and kidney damage, impaired memory and more. Overall, sustained exposure to these toxic air contaminants as a result of living directly adjacent to a gas station may lead to the following health issues: increased potential cancer risk, hematologic (or blood) disorders, reproductive or development issues, kidney problems, and issues with the nervous, respiratory, or endocrine systems.



dispensing facilities with a throughput of 3.6 million gallons per year or greater be sited at least 300 feet from residences. Given that this gas station would be approximately 65 feet from homes in the Park Ridge subdivision and that the health risks increase as the distance decreases, significantly more caution about potential health risks should be exercised in this case regardless of the total anticipated throughput of gasoline. At a minimum, before any decision is made to proceed with this project, a health risk assessment should be conducted including a comprehensive analysis of the dispersion of hazardous substances in the environment, their potential for human exposure, and a quantitative assessment of both individual and population-wide health risks associated with those levels of exposure.

The significant noise and lighting impacts generated by activities at the site is another reason this proposed project is incompatible with adjacent residential uses. The fueling stations and the convenience store are proposed to be operated 24 hours per day, resulting in constant and disruptive noise during nighttime hours as well as constant bright light and glare from the facility lighting and intermittent light flashing from the headlights of cars entering and exiting the site. The carwash and vacuum stations — all of which are located on the south side of the site closest to the homes — will be operated from 6:00 a.m. to 10:00 p.m. Monday to Saturday, resulting in noise disturbance in the early-morning and late-evening hours.

As the staff report also documents, the constrained nature of the site has resulted in a proposed site plan for the gas station that neither works in practice nor meets applicable City Municipal Code requirements:

- The site is narrow and triangularly shaped, creating significant problems with the flow of vehicles into and out of the site, exacerbated by probable queuing for the car wash. The applicant's traffic study determined that the site allows for queuing of only three cars for the carwash before blocking the driveway on Country Hills Drive, potentially causing traffic hazards on that street. The applicant proposed that if queuing exceeds two vehicles, employees will direct vehicles to stack in front of vacuum stations and place cones to prevent other cars from Country Hills Drive from jumping the queue, a suggestion staff properly rejects as unrealistic.
- The Code provides that no service station driveway shall exceed 20 feet in width, but the two proposed driveways are each 30 feet in width.
- Staff notes that the narrow configuration of the site will cause fuel trucks to have difficulty entering via Country Hills Drive and that the right-in, right-out driveway constraints will prevent fuel trucks from accessing the site from Highway 4 via Laurel Road, requiring them to make lengthy additional trips on City streets.

- The fuel canopy is proposed to encroach eight feet into the minimum 20-foot rear setback requirement,<sup>3</sup> bringing the pumps and the vehicles closer to the homes in Park Ridge.
- The Code requires 16 parking spaces for a facility of this size, but the applicant has included only six parking spaces while proposing that the area designated for car vacuuming should be treated as the equivalent of ten parking spaces.
- The Citywide Design Guidelines require car washes to minimize blower noise and be oriented away from sensitive uses, but the proposed site design orients the vacuum stations directly toward the residential uses and places them closest to the residences. Staff, appropriately, is “concerned that the current vacuum canopy location adjacent to residences will be a nuisance.”

In short, the proposed uses are not allowable under the current general plan and zoning designations for the site; the site is not located, sized or configured in a way that is appropriate for a facility of this nature; the proposed plan for the site is inconsistent with numerous City code provisions designed to avoid the types of problems the uses present; and the applicant’s proposed solutions are either impractical or ineffectual; the uses will create health risks, noise, traffic, light and glare and other nuisance impacts on the adjacent residences; and approval of a gas station/convenience store/carwash directly adjacent to residential uses would be a sharp departure from a consistent line of City Council decisions over the past 45 years.

Sincerely,

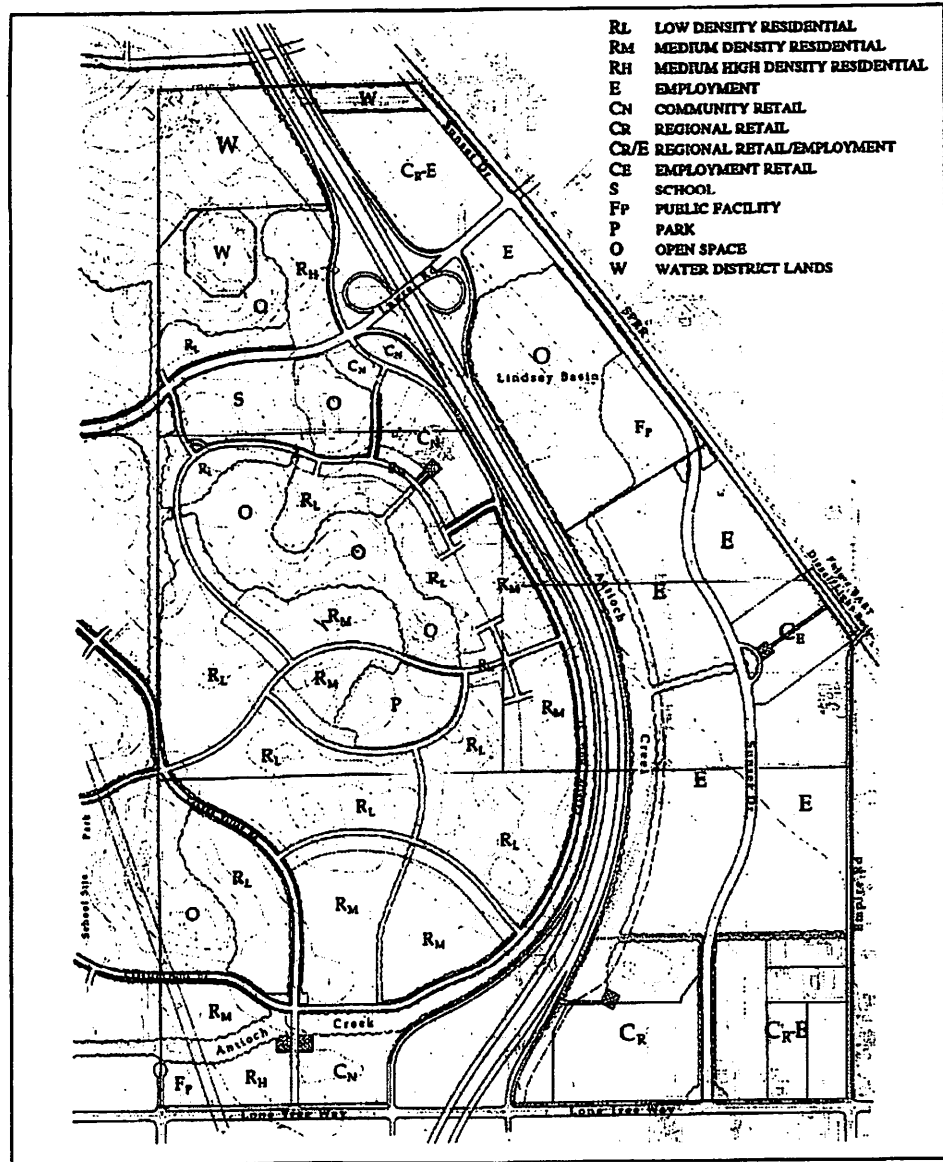


Steve Abbs  
Vice President, Land Acquisition & Development

Encls.

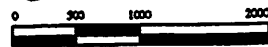
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<sup>3</sup> AMC § § 9-5.3815 states: “No gasoline pump or facility for dispensing gasoline, and no pump island in which the same is or may be located, shall be nearer than 20 feet from any property line nor nearer than 35 feet from any parking space.”



Source: ELS/Elhassani & Logan

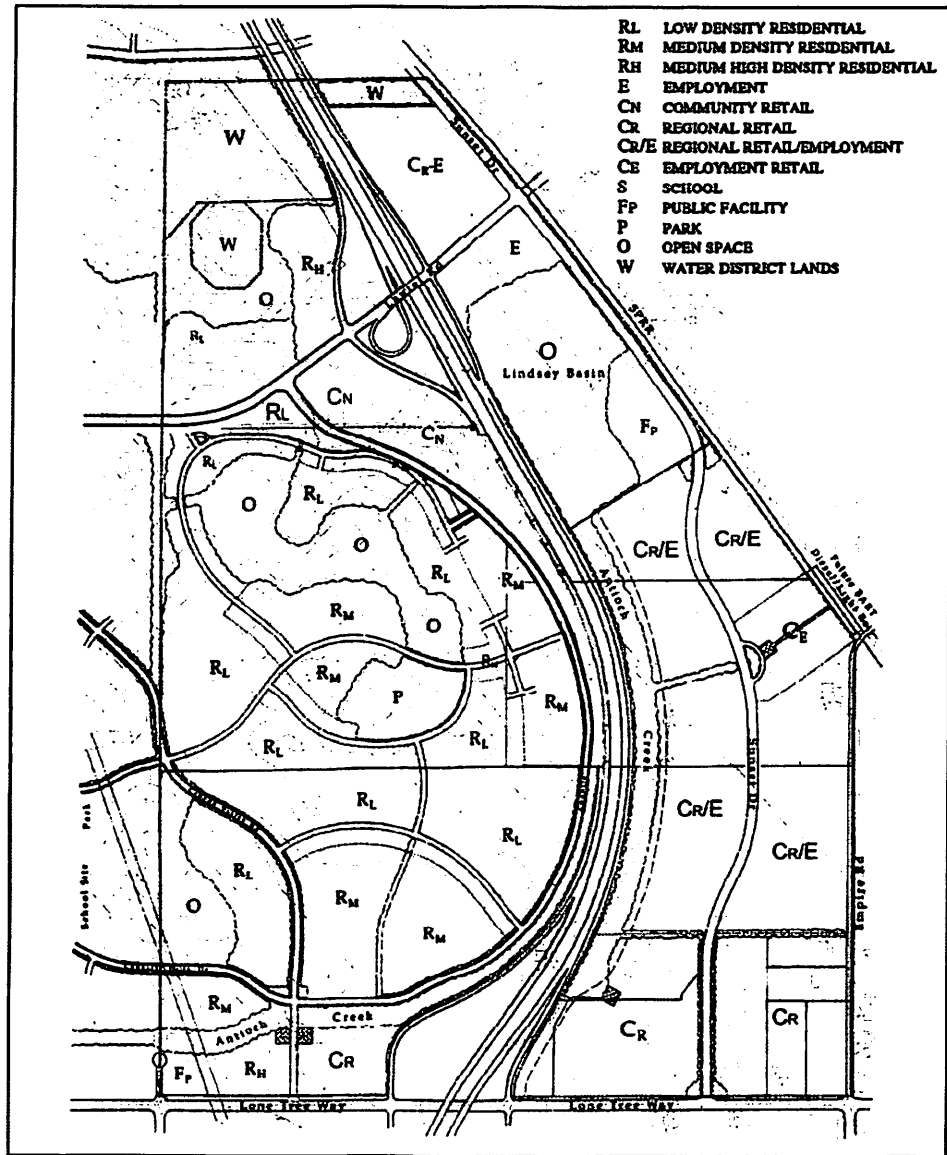
Figure 3



### Specific Plan Land Uses

Antioch Future Urbanization Area #2 EIR

Figure 6: Original 1996 Specific Plan Land Use Map



Source: ELS/Elbasant & Logan and City of Antioch



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RICHARD T. GRIFFIN, ARCHT  
CITY & SUBURBAN PLANNING

## East Lone Tree Specific Plan Land Uses (As Amended 7.28.05)

**Figure 7: Current Specific Plan Land Use Map**