

**June 15, 2026**

**Windsor Town Council**

**9291 Old Redwood Hwy #400**

**Windsor, CA 95492**

**RE: Comments Regarding Fuel Service Station Ban Revisions**

Honorable Mayor and Councilmembers,

The California Fuels & Convenience Alliance (CFCA) represents California's independent gas station and convenience store operators, including businesses operating within the Town of Windsor, the majority of which are locally owned and operated establishments. We value the opportunity to share our perspective on the Town Council's potential revisions to Ordinance No. 2022 366, which established a ban on new gas stations within Windsor. As representatives of locally owned small businesses and stakeholders in the local economy, we must respectfully express our significant concerns regarding, and opposition to, the policy options discussed during the Town Council's May 6, 2026, meeting.

As business owners and employers who serve communities throughout California, we support practical policies that preserve environmental goals while also fostering economic opportunity and local prosperity. Unfortunately, Windsor's current gas station ban and the policy direction recently discussed by the Council fail to strike that balance and risk creating unintended consequences for local businesses, residents, and the Town's long-term economic health.

When evaluating the impacts of Ordinance No. 2022 366, it is important to begin with its effect on Windsor itself. According to Town data, Windsor's four existing gas stations account for nearly 8 percent of the Town's aggregate sales tax revenue. By prohibiting new fuel retail development, the Town has effectively placed an artificial cap on a meaningful source of local tax revenue and economic activity. At a time when Windsor faces ongoing fiscal challenges, it is worth considering whether maintaining restrictions on new investment remains in the Town's best interest.

The fueling and convenience industry contributes billions of dollars annually in state and local taxes that support transportation infrastructure, public services, and essential community programs. Fuel taxes and local sales taxes generated through fuel sales help fund transportation improvements and infrastructure projects that benefit all motorists, including those who drive electric vehicles. Limiting opportunities for future fuel retail development necessarily limits future tax contributions that could otherwise support these public priorities.

Beyond tax revenue, a gas station ban carries broader implications for local residents and the local economy. The fueling and convenience industry supports tens of thousands of jobs

throughout California and provides valuable opportunities for entrepreneurship and small business ownership. Prohibiting new fuel retail development reduces opportunities for future investment, job creation, and business ownership within Windsor.

These impacts are particularly significant given the unique makeup of the industry. Approximately 40 percent of convenience stores are minority owned and roughly 60 percent are owned by first generation immigrants. For many entrepreneurs, fuel retailing represents an accessible pathway to small business ownership and economic mobility. Policies that prohibit new market entry inevitably fall hardest on prospective small business owners seeking an opportunity to invest in their communities.

Local residents may also bear unintended consequences. Limiting opportunities for future fuel retail competition can reduce consumer choice and place upward pressure on fuel prices over time. Those impacts are often felt most acutely by working families, seniors, and lower income residents who continue to rely on gasoline powered vehicles and may not yet have access to alternative transportation options.

Most concerning, however, is the apparent contradiction at the heart of the Town's current policy discussion. During the May 6 meeting, the Council directed staff to develop an exemption to Ordinance No. 2022 366 that would allow certain large retailers to establish fuel facilities while the prohibition remains in place for all other businesses.

If new fuel facilities are incompatible with Windsor's planning objectives, then creating a special exemption for a select category of retailer does not resolve that concern. Conversely, if the Town now recognizes that fuel retailing can provide meaningful fiscal and economic benefits to the community, those opportunities should not be reserved exclusively for a narrow class of applicants. Public policy should be guided by consistent principles, not by the identity or size of the entity seeking an exemption.

This approach is particularly troubling because it appears to be driven not by sound public policy considerations, but by the Town's desire to address fiscal challenges that have been exacerbated, in part, by its own prior policy decisions. Rather than reevaluating the ordinance itself and the economic constraints it has imposed, the Council has chosen to dedicate additional staff time and public resources toward developing a special exemption intended to attract a select category of large corporate interests.

Such an approach sends a troubling message to Windsor's small business community. Locally owned businesses do more than generate tax revenue. Their owners live in the community, employ local residents, purchase goods and services from other local businesses, support school fundraisers and youth sports programs, contribute to charitable causes, and reinvest their earnings close to home. When local businesses succeed, the economic benefits are more likely to remain within Windsor and support the broader community. By contrast, large national retailers

often centralize decision making and direct a substantial portion of profits outside the community, reducing the extent to which those economic benefits circulate locally.

Equally troubling is the message such a carveout sends to existing Windsor businesses that have operated under the Town's current rules for years. Businesses that have invested in the community, created jobs, and contributed tax revenue should not be placed at a competitive disadvantage while a special pathway is created for a new market entrant solely because of its size and purchasing power.

Creating a special exemption for large retailers while maintaining barriers that prevent local entrepreneurs, independent operators, and family-owned businesses from competing on equal footing undermines the principles of fairness and economic opportunity that local governments should strive to uphold. It suggests that access to the Windsor marketplace is determined not by the merits of a proposal or the needs of the community, but by the size and influence of the applicant.

Moreover, this strategy risks producing the opposite of its intended effect. Existing and prospective business owners may reasonably conclude that Windsor is willing to modify its policies when a large corporation expresses interest, but not when local businesses seek the same opportunity. That perception can discourage investment, erode confidence in the Town's regulatory framework, and weaken the entrepreneurial environment that has long contributed to Windsor's character and economic vitality.

While addressing budget deficits is a legitimate and important objective, selectively favoring large corporate interests over local businesses is not a sustainable economic development strategy. The Town should pursue policies that encourage investment, competition, job creation, and economic growth for all businesses, not policies that pick winners and losers based on scale.

If the Council believes that fuel retailing can provide meaningful economic and fiscal benefits to Windsor, then those opportunities should be available to all qualified businesses under a fair and transparent regulatory framework. The Town should not respond to a policy-induced revenue challenge by creating special exceptions for large corporations. Instead, it should restore a level playing field that allows all qualified businesses, large and small alike, to compete, invest, create jobs, and contribute to Windsor's economic future.

Accordingly, we respectfully urge the Town Council to reconsider this proposed policy direction and instead evaluate repealing Ordinance No. 2022 366 in its entirety. While repeal alone may not resolve the Town's fiscal challenges, it would restore equal opportunity, remove an unnecessary barrier to investment, and allow Windsor to benefit from the sales tax revenue, property tax revenue, employment opportunities, and economic activity that responsible fuel and convenience retail development can provide.

Sincerely,



**Alessandra Brichetto**, Senior Director of Government Affairs  
California Fuels & Convenience Alliance



**Elizabeth Graham**, CEO  
California Fuels & Convenience Alliance

