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Subject: Mega industrial Park comment
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Dear Roseville Planning Division,
I am a Roseville resident and I am writing to you today about the Roseville Industrial Park EIR. Please email me back to let me know you have received my comments. Thank you.

Energy

The EIR concludes that the project will not result in a "wasteful, inefficient, or unnecessary" consumption of energy simply because the developer promises to "at a minimum, comply with the California Energy Code standards" (CALGreen). Building to the bare legal minimum is not an environmental mitigation, nor does it address the unique, massive energy draw of a data center. The EIR completely fails to analyze whether using 27 massive fossil-fuel generators (fifteen 4,000-HP generators and twelve 500-HP generators) is the most technologically *efficient* way to provide backup power, or if burning that much diesel is inherently wasteful compared to modern alternatives.

A mandatory mitigation measure **must** be added requiring the Innovation Tech Park to maximize on-site renewable energy generation. The developer must be required to install solar photovoltaic (PV) arrays on all viable commercial rooftops and build solar shade canopies over all surface parking lots prior to occupancy.

The EIR tries to praise the project for including only "limited natural gas infrastructure," pointing out that homes will be electric and gas will only be used for "non-residential land uses". However, the EIR's own data table contradicts this "limited" narrative. The data shows the "Innovation" land use alone will consume over 34 million kBTU/year of natural gas. Calling a commercial demand of tens of millions of kBTUs "limited" is highly misleading and avoids any mandate to electrify the commercial buildings.

The EIR **must** formally reject the use of twenty-seven massive diesel generators as they are a wasteful and inefficient use of fossil fuels. The mitigation must physically mandate that the data center and commercial buildings utilize Battery Energy Storage Systems (BESS) or green hydrogen fuel cells as their primary backup power source.

Additionally, a binding mitigation measure **must** be added requiring the total decarbonization of the *entire* project, not just the homes. The Innovation Tech Park, retail, and medical offices must be built 100% electric, utilizing modern commercial heat pumps for HVAC and water heating, completely eliminating the proposed 34 million+ kBTU/year natural gas draw.

The EIR attempts to prove that the project's transportation energy consumption is not wasteful by citing the exact same flawed statistic used in the Transportation section: an "average VMT per service population of 14.2". This number is artificially deflated by blending high-employment numbers with low-residential-population estimates. Because the VMT foundation is mathematically flawed, the EIR's conclusion that commuter fuel consumption is "efficient" is entirely invalid.

The transportation fuel consumption analysis **must** be entirely recalculated using the un-blended, residential-only VMT figures. Once the true commuter fuel waste is revealed,the EIR must require the developer to fund a dedicated electric micro-transit shuttle or heavily subsidize EV purchases/leases for the low-income residents of the high-density housing units to actively reduce local transportation fuel consumption.

Hydrology and Water Quality

The EIR admits the project will alter drainage patterns and increase runoff volumes. To mitigate this, it relies on Mitigation Measure 3.12-3, requiring the developer to "purchase retention credits" in the planned Pleasant Grove Stormwater Retention Basin Facility. However, the document blatantly admits this basin is an "ongoing, unapproved project". Relying on purchasing financial credits for a facility that has not been approved or built yet does not physically stop the immediate floodwaters the project will create when paved over. This is a classic example of illegal, deferred mitigation.

Mitigation Measure 3.12-3 **must** be completely rewritten to prohibit the use of off-site

retention credits for an unbuilt, unapproved basin. The developer must be required to design, fund, and construct 100% of its required stormwater retention capacity *on-site* (e.g., through enlarged detention basins, bio-swales, and underground vaults) prior to the issuance of the first grading permit.

The EIR dismisses the loss of groundwater recharge caused by paving the site by claiming the new impervious surfaces would "account for less than 0.1 percent of the surface area of the North American River subbasin". This "drop in the bucket" argument is frequently rejected by CEQA courts because it ignores cumulative impacts. Furthermore, it completely ignores the localized impact of removing 241 acres of permeable soil right above a subbasin that the State has explicitly ranked as "high priority".

To mitigate the "drop in the bucket" groundwater impact, a mandatory mitigation measure **must** require the project to utilize permeable paving for all commercial parking stalls, residential driveways, and low-traffic neighborhood roadways. The project must aggressively maximize on-site infiltration to protect the high-priority groundwater subbasin.

For the northern residential area, the EIR states the City may realign University Creek. If it doesn't happen, the developer is supposed to magically "adjust the lot layout and grading" later to stay out of the floodplain. This is entirely deferred mitigation. The EIR is supposed to analyze the exact, finalized footprint *now*, rather than approving the project and figuring out if the homes will flood later.

The tentative subdivision map for the northern residential area **must not** be approved until University Creek's realignment is officially approved, funded, and finalized by the City. No "conditional" lot layouts or deferred grading plans should be permitted in a floodplain.

The EIR admits that FEMA "currently has a moratorium on LOMR-F’s with no end date cited" (Letter of Map Revision Based on Fill). The EIR waives this off because the developer got a "conditional" approval (CLOMR-F) to build. This is a massive risk to future residents: it means the developer can build and sell the homes, but if FEMA's moratorium doesn't lift, the new homeowners could be permanently stuck in a federal regulatory floodplain and forced to pay exorbitant, mandatory flood insurance premiums.

A legally binding Development Agreement clause **must** be added protecting future

residents from the FEMA moratorium. If the final FEMA LOMR-F is not officially approved and recorded by the time residential units are sold, the developer must place funds in an escrow account to fully subsidize the cost of mandatory flood insurance for those homeowners until the map revision is officially granted by the federal government.

Noise

The EIR explicitly admits that the project will cause a 10-dBA increase in traffic noise along Blue Oaks Boulevard west of Westbrook Boulevard. A 10-dBA increase is perceived by the human ear as a *doubling* of the noise volume. Yet, the EIR claims this is "significant and unavoidable" simply because a 6-foot masonry sound wall was already built during the previous Creekview Specific Plan. They conclude "no additional feasible mitigation is available" and completely let the current developer off the hook for **doubling** the neighbors' traffic noise.

The developer **must** fund an Acoustic Retrofit Program. If they cannot build a taller sound wall, the developer must provide direct funding to the affected residents in the Creekview subdivision to retrofit their homes with highly rated acoustic (STC-rated double or triple-pane) windows and heavy solid-core exterior doors to mitigate the interior noise impacts.

As we noted in the Air Quality section, this project includes a staggering twenty-seven massive backup diesel generators. The EIR admits these generators will exceed daytime and nighttime noise standards. However, instead of requiring specific, engineered sound enclosures right now, the EIR relies on a deferred "noise minimization plan" to be developed *later*. It makes assumptions that placing buildings in the line-of-sight and enclosing the generators will magically reduce the noise by up to 30 decibels to make the impact "less than significant". A promise to make a plan later is not a valid mitigation under CEQA.

The EIR **must** physically mandate the exact specifications for the generator enclosures *now*. The mitigation must explicitly require all backup generators to be housed in custom-engineered, sound-attenuating enclosures (e.g., minimum STC 35 rating) and be equipped with hospital-grade exhaust silencers.

The EIR acknowledges that heavy construction equipment will generate 85 VdB of groundborne vibration at the nearest homes, which exceeds the 80 VdB threshold.

Mitigation Measure 3.6-2 proposes a "Vibration Control Plan" that includes "real-time monitoring" and only requires the contractor to act *if* levels approach the threshold. This is a reactive measure; it waits for the neighbors' homes to be rattled before forcing the contractor to change their methods.

The EIR **must** expand Mitigation Measure 3.6-2 to be proactive, not reactive. A strict prohibition on the use of heavy vibratory rollers within 100 feet of any existing residential property line must be added. The contractor must be legally required to use static rollers or alternative, low-impact soil compaction methods when operating adjacent to the Creekview neighborhood.

The data center requires routine testing of its generators. A mitigation measure **must** be added requiring permanent, continuous noise monitors to be installed at the property lines facing sensitive receptors. If the noise levels exceed the City's nighttime limits during routine maintenance or operation, the equipment must trigger an automatic shutdown, and the developer must be heavily fined.

Hazards & Hazardous Materials

The EIR attempts to downplay toxic risks by claiming the project prohibits hazardous materials handling as a "primary use." However, it explicitly admits that these materials are allowed as an "ancillary use." Crucially, the EIR openly permits the construction of Biosafety Level 2 (BSL-2) laboratories, facilities that handle moderate-risk infectious pathogens (like Staphylococcus and Salmonella). Despite allowing BSL-2 labs and massive bulk diesel storage for the data center's 27 generators, the EIR concludes the impact is "less than significant" and requires *zero mitigation* simply because businesses will fill out standard state compliance forms. Filling out paperwork does not physically protect the adjacent residential neighborhoods from an accidental spill or containment breach.

The EIR **must** physically mandate a strict setback. Any facility designated as a BSL-2 laboratory, and any facility storing bulk quantities of hazardous materials (including the massive diesel tanks for the data center), must be located a minimum of 500 to 1,000 feet away from any residential property line, school site, or public park. Additionally, a binding mitigation measure **must** be added that permanently prohibits the storage, use, or transport of specifically highly acutely toxic, explosive, or highly reactive chemicals (beyond standard household/commercial cleaning supplies) anywhere within the Innovation Tech Park.

The EIR acknowledges that a massive new electrical substation (225 by 175 feet, with 70-foot steel poles) will be built on the site. The project is also situated on the western edge of the city, bordered by dry grazing land. Yet, Mitigation Measure 3.9-3b only addresses *construction* fire risks (e.g., requiring water trucks and spark arresters while welding). The EIR completely ignores the long-term, *operational* fire ignition risk of a massive electrical substation and 27 high-voltage diesel generators operating continuously next to open grass fields for decades.

The EIR **must** expand Mitigation Measure 3.9-3 to cover the lifetime of the project. A mandatory, permanent 100-foot irrigated and actively maintained defensible space buffer must be added around the entire perimeter of the electrical substation and the data center generator yards to prevent an electrical fault from sparking a massive wildland fire in the adjacent County grazing lands.

When evaluating whether the project impairs emergency evacuation plans, the EIR waves away the massive influx of 1,650 residents and 980 employees. Instead of proving the roads can handle a mass evacuation, the EIR states that an Incident Commander might just "keep everyone on-site in a safe refuge area [or] have people shelter in place" depending on the emergency. Relying on the assumption that people can simply be told to stay put so the City doesn't have to analyze the actual traffic gridlock of a neighborhood evacuation is a dangerous and unacceptable evasion of CEQA requirements.

There **must** be no building permits be issued until a comprehensive, localized Evacuation Traffic Management Plan is completed. This plan must use physical traffic modeling to prove that all 1,650 residents and 980 employees can simultaneously evacuate the site via Blue Oaks Boulevard and Westbrook Boulevard within a safe time limit without causing fatal gridlock.

Utilities & Service Systems

The EIR explicitly admits that during single and multiple dry years, "there would be a deficit in projected water supplies". During a 5-year drought, this deficit could reach up to 8.6%. However, the EIR dismisses this as "less than significant" by claiming the City will simply implement its Water Shortage Contingency Plan (WSCP) to reduce water demand. This is a massive loophole: the developer is introducing a massive new water demand that

guarantees a deficit during droughts, but the "mitigation" relies on forcing the *existing* residents of Roseville to take shorter showers and let their lawns die to subsidize the developer's impacts.

The EIR **must** require the developer implement strict, on-site water recycling. The Innovation Tech Park and data center must be required to utilize closed-loop cooling systems that do not constantly consume potable water. Any net new water demand that exacerbates the City's drought deficit must be offset by the developer physically funding new local groundwater wells or securing independent firm water rights.

The EIR notes that the Pleasant Grove Wastewater Treatment Plant (PGWWTP) was expanded to 12 mgd in 2023 because previous growth projections showed capacity would be exceeded by 2027. However, the EIR also admits that this specific proposed project "was not considered in the City's water demand projections" at the time the 2020 Urban Water Management Plan was prepared. By rubber-stamping this massive new amendment, the developer is essentially poaching wastewater and water capacity that was carefully planned and paid for to serve *other* previously approved projects.

The project **must** rigorously expand the use of the City's recycled "purple pipe" water to ensure absolutely zero potable water is used for commercial, industrial, or public landscaping.

The EIR dismisses solid waste impacts by arguing that the waste generated by the project would just be a "small percent of the remaining daily capacity of the Western Regional Sanitary Landfill". This is a classic "drop in the bucket" argument that CEQA courts frequently reject for cumulative impacts. Furthermore, the EIR completely fails to analyze the specific types of industrial solid waste that an "Innovation Tech Park" and data center will generate, specifically massive volumes of electronic waste (e-waste), obsolete server racks, and toxic degradation of the 27 massive diesel generators and their batteries.

The developer **must** pay a premium, supplemental wastewater capacity fee beyond the standard rate. Because this project was not in the original General Plan growth projections, this fee must be specifically ring-fenced to fund the *next* phase of expansion at the PGWWTP, ensuring existing ratepayers are not forced to subsidize the accelerated consumption of the plant's capacity.

Thank you for your attention to this matter.

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