

Phillip Road Site: Draft EIR Comments

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VIA EMAIL

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1.1 Re: Phillip Road Site Draft EIR Comments

Dear Eric Singer and City of Roseville,

Thank you for the opportunity to comment on the Draft Environmental Impact Report (DEIR) for the Phillip Road Project (SCH# 2025060240). I am a Roseville resident whose property is located in the project's area of influence. This comment letter evaluates the technical adequacy and legal sufficiency of the DEIR pursuant to CEQA Guidelines § 15204 and Public Resources Code § 21177(a). The City of Roseville, acting as Lead Agency, and the applicant, Panattoni Development Company, characterize the proposed project as a 176-acre "mixed-use village" comprising residential units, medical offices, and an "Innovation Tech Park." The DEIR presents the project as a localized development intended to balance housing and employment in the western sector of the city.

However, a detailed review of the project's engineering schematics, utility master plans, and legal context within the technical appendices does not support that characterization. The infrastructure proposed for approval is not consistent with a mixed-use village; it is sized and configured for a regional freight corridor and large-scale data center facility.

The evidence presented in this comment letter supports the conclusion that the DEIR's project description is inconsistent with the physical infrastructure the project proposes to construct. The discrepancy between the project description (low-intensity office/residential) and the physical infrastructure (high-intensity industrial/freight) results in a fundamentally unstable project description under CEQA Guidelines § 15124, effectively securing entitlements for high-intensity industrial infrastructure without the environmental analysis required for such a facility. Furthermore, the infrastructure explicitly detailed in the project's appendices—specifically the sanitary sewer conveyance systems and roadway dedication footprints—is sized not for the disclosed 176-acre project, but for the full build-out of the surrounding 1,000+ acre Reason Farms property. This constitutes a violation of the California Environmental Quality Act (CEQA) prohibition against "piecemealing" (segmenting a larger project into smaller parts to avoid

comprehensive environmental review).

1.2 Summary of Key Findings

This comment letter identifies four primary categories of discrepancies where the DEIR's project description conflicts with the engineering data provided in the technical appendices. These findings are supported by verification against published engineering standards and external regulatory documents.

1. **Infrastructure Piecemealing (The 60-Inch Sewer):** The DEIR authorizes the construction of a 60-inch (5-foot) diameter sewer trunk line (Point of Connection 1, or POC-1). Hydraulic calculations confirm this pipe has a conveyance capacity exceeding 25 Million Gallons Per Day (MGD), whereas the proposed project generates only ~0.4 MGD. This excess capacity—exceeding 64 times the project's disclosed demand—confirms the pipe is a regional interceptor designed to serve potential unanalyzed future phases of the Reason Farms expansion.
2. **Hidden Industrial Use (Power & Water):** The project includes a 60kV on-site substation and 45 Megawatts (MW) of diesel backup generation capacity (15 x 3MW generators). This infrastructure density is consistent with hyperscale data centers, not commercial offices. Furthermore, the project reserves 537 Acre-Feet/Year (AFY) of recycled water specifically for "cooling," a volume that exceeds the project's entire potable water demand. This water profile matches the evaporative cooling needs of a large data center, not an innovation park.
3. **Regional Freight Alignment:** The project dedicates 22.7 acres for the Placer Parkway regional expressway interchange and widens Blue Oaks Boulevard to a six-lane Surface Transportation Assistance Act (STAA) terminal access route. These dimensions are required for regional logistics and freight movement, allowing 53-foot trailers and twin trailers, which contradicts the "local mixed-use" narrative. The DEIR declines to analyze the interchange reservation as a project characteristic on the grounds that "an EIR was certified for Placer Parkway" (Chapter 2, p. 2-27)—a factually incorrect characterization: the controlling CEQA document for Placer Parkway Phase 1 is an Initial Study/Mitigated Negative Declaration (SCH# 2015052032), not a certified EIR. The project-specific consequence of hosting a regional expressway interchange node adjacent to the innovation center is not analyzed anywhere in the DEIR.
4. **Regulatory Conflict of Interest:** The rezoning of the subject property is driven by a legal settlement with the California Department of Housing and Community Development (HCD) regarding the Surplus Land Act. The City has agreed to pay a statutory penalty and is under a settlement agreement effective September 16, 2024, creating a financial compulsion to entitle the land swiftly. This compromises the City's ability to act as a neutral Lead Agency under CEQA.

1.3 Summary Conclusion

The DEIR contains a fundamental deficiency in its Project Description (CEQA Guidelines § 15124). By analyzing the environmental impacts of a low-intensity "Innovation Park" while approving the physical infrastructure for high-intensity industrial and freight operations, the Lead Agency has understated the project's noise, air quality, greenhouse gas, and energy impacts. The project, as currently defined, cannot proceed without a Recirculated DEIR that analyzes the actual scope of the intended industrial operations and the cumulative impacts of the full Reason Farms build-out enabled by the proposed infrastructure.

2. PIECEMEALING (INFRASTRUCTURE CAPACITY)

2.1 The Theory of Piecemealing

In the context of California environmental law, "piecemealing" or "segmentation" refers to the statutorily precluded practice of dividing a single large project into smaller, individual sub-projects to avoid analyzing the full scope of environmental impacts. The precedent set by *Laurel Heights Improvement Assn. v. Regents of University of California* (1988) established that an Environmental Impact Report (EIR) must analyze future expansion if: (1) it is a reasonably foreseeable consequence of the initial project; and (2) the future expansion will be significant in that it will likely change the scope or nature of the initial project or its environmental effects.

For the Phillip Road Project, the central concern is that the infrastructure being approved has no independent utility unless the larger 1,200-acre Reason Farms property is fully developed. The 176-acre site functions as the initial phase that justifies the installation of regional trunk lines and interchanges, effectively unlocking the remainder of the property for development without subjecting that larger expansion to the current environmental review. The primary evidence for this lies in the hydraulic capacity of the proposed sewer system.

2.2 Evidence A: The 60-Inch Sewer Trunk Line

DEIR Claim: Across three independent chapters, the DEIR makes an identical sworn assertion that the wastewater infrastructure is sized exclusively for the 176-acre project and the Roseville Environmental Utilities Operations Center, and will not serve any other future development. Chapter 5 ("Growth-Inducing Impacts," Section 5.1.2, p. 5-3) states: "The off-site infrastructure improvements would not, however, support other future development." Chapter 3.11 (Impact 3.11-1, p. 3.11-14) states that "[t]he wastewater pipelines have been sized with adequate capacity to serve the project" and its Summary (p. 3.11-15) adds: "No additional utility infrastructure beyond what was described and evaluated in this EIR would be required to serve the project." Chapter 4 (Section 4.3.11, p. 4-26) repeats the identical finding verbatim. The DEIR discloses the project's wastewater generation as approximately 0.4 MGD average dry weather flow (Impact 3.11-1, p. 3.11-14); Table 3.11-7 (p. 3.11-19) shows the underlying land use calculation yields only 0.173 MGD—the gap attributable to the approximately 0.16 MGD data center blowdown stream evaluated in Appendix F4 solely as a hydraulic pipe-sizing input. A screenshot of Appendix F4, Table 2 is provided on the next page.

Table 2
Phillip Road Site
Wastewater Generation by Land Use

Land Use	Land Use Abbreviation	Total Area (Acres)	ADWF (MGD)
Light Industrial	LI	56.144	0.0477
Community Commercial	CC	7.913	0.0067
Low Density Residential	LDR	95.589 or 529 units ⁽²⁾	0.1005
High Density Residential	HDR	5.860 or 135 units ⁽²⁾	0.0176
Park	PR	4.914	-
Public/Quasi-Public (Developable Area)	P/QP	1.429 ⁽³⁾	0.0009
Wastewater Generation by Land Use Subtotal:			0.1734
Discharge from Data Center			0.1600
Phillip Road Site Total			0.3334
EU Ops			0.0525
Total Flow from Site			0.3859

(1) Includes 0.160 MGD of discharge from a potential 40MW Data Center.

(2) The wastewater generated is based on the number of dwelling units as it is greater than that calculated by area.

(3) Consists of Public/Quasi-Public area designated for Roseville Electric (1.033 acres) and an area near the proposed bridge for a Sewer Lift Station (0.396 acres).

Parcel LL-5, as shown in **Exhibit 2 – Tentative Map** is assumed to contain a potential 40 MW Data Center which adds approximately 480,000 gpd of peak demand flow for a cooling system. It is anticipated that a third of this flow for the cooling system will be discharged to the wastewater system with the remaining evaporated during the cooling process of the Data Center.

The ADWF from the Proposed Project plus the ADWF from the EU Ops Center combined is 0.386 MGD. The City has verified that the combined ADWF does not cause the sewer main downstream of the connection point to exceed 70% of full depth, crown to crown.

Finding: The Phillip Road Site Wastewater Master Plan (Appendix F4, Laugenour and Meikle 2026) identifies the Point of Connection 1 (POC-1) for the sewer system as a **60-inch diameter pipe**. A screenshot of this page is provided directly below.

FlexTable: Pipe Table

Label	Start Node	Stop Node	Diameter (in)	Material	Hazen-Williams C	Flow (gpm)	Velocity (ft/s)	Headloss Gradient (ft/ft)	Length (User Defined) (ft)	Headloss (Friction) (ft)
P-1	J-1	J-2	24.0	PVC	130.0	159	0.11	0.000	964	0.00
P-2	J-2	J-3	24.0	PVC	130.0	159	0.11	0.000	788	0.00
POC-1	R-1	J-1	60.0	PVC	130.0	159	0.02	0.000	1	0.00
POC-2	R-2	J-51	60.0	PVC	130.0	195	0.02	0.000	1	0.00
P-6	J-5	J-6	24.0	PVC	130.0	63	0.04	0.000	1,034	0.00
P-7	J-6	J-7	24.0	PVC	130.0	0	0.00	0.000	108	0.00
P-11	J-6	J-64	16.0	PVC	130.0	63	0.10	0.000	1,818	0.01
P-82	J-64	J-65	16.0	PVC	130.0	0	0.00	0.000	880	0.00
P-8	J-5	J-8	12.0	PVC	130.0	95	0.27	0.000	371	0.01
P-10	J-8	J-9	12.0	PVC	130.0	95	0.27	0.000	358	0.01
P-19	J-9	J-15	12.0	PVC	130.0	95	0.27	0.000	55	0.00
P-42	J-15	J-34	12.0	PVC	130.0	14	0.04	0.000	400	0.00
P-43	J-34	J-35	12.0	PVC	130.0	-33	0.09	0.000	26	0.00
P-80	J-35	J-63	12.0	PVC	130.0	-33	0.09	0.000	609	0.00
P-79	J-63	J-62	12.0	PVC	130.0	30	0.09	0.000	338	0.00
P-83	J-62	J-66	12.0	PVC	130.0	2	0.01	0.000	42	0.00
P-9	J-8	SERV-HDR-2	12.0	PVC	130.0	0	0.00	0.000	20	0.00
P-20	J-15	J-16	12.0	PVC	130.0	81	0.23	0.000	208	0.01
P-21	J-16	J-17	12.0	PVC	130.0	96	0.27	0.000	232	0.01
P-22	J-17	J-18	12.0	PVC	130.0	85	0.24	0.000	126	0.00
FP-1	J-18	FH-1	6.0	Ductile Iron	130.0	0	0.00	0.000	35	0.00
P-23	J-18	J-19	12.0	PVC	130.0	85	0.24	0.000	423	0.01
FP-2	J-19	FH-2	6.0	Ductile Iron	130.0	0	0.00	0.000	35	0.00
P-24	J-19	J-20	12.0	PVC	130.0	-77	0.22	0.000	485	0.01
FP-3	J-20	FH-3	6.0	Ductile Iron	130.0	0	0.00	0.000	35	0.00
P-25	J-20	J-21	12.0	PVC	130.0	-77	0.22	0.000	44	0.00
P-28	J-21	J-23	12.0	PVC	130.0	-66	0.19	0.000	232	0.00
P-29	J-23	J-24	8.0	PVC	130.0	-18	0.11	0.000	308	0.00
FP-5	J-24	FH-5	6.0	Ductile Iron	130.0	0	0.00	0.000	39	0.00
P-30	J-24	J-16	8.0	PVC	130.0	-18	0.11	0.000	326	0.00
P-31	J-16	J-25	12.0	PVC	130.0	-32	0.09	0.000	32	0.00
FP-6	J-25	FH-6	6.0	Ductile Iron	130.0	0	0.00	0.000	39	0.00
P-32	J-25	J-26	12.0	PVC	130.0	-32	0.09	0.000	190	0.00
P-33	J-26	J-27	8.0	PVC	130.0	19	0.12	0.000	235	0.00
FP-7	J-27	FH-7	6.0	Ductile Iron	130.0	0	0.00	0.000	35	0.00
P-34	J-27	J-28	8.0	PVC	130.0	19	0.12	0.000	103	0.00
P-35	J-28	J-29	8.0	PVC	130.0	13	0.08	0.000	299	0.00
P-36	J-29	J-30	12.0	PVC	130.0	48	0.14	0.000	42	0.00
FP-8	J-30	FH-8	6.0	Ductile Iron	130.0	0	0.00	0.000	35	0.00
P-37	J-30	J-23	12.0	PVC	130.0	48	0.14	0.000	180	0.00
P-53	J-29	J-42	12.0	PVC	130.0	-36	0.10	0.000	246	0.00
P-56	J-42	J-44	12.0	PVC	130.0	-34	0.10	0.000	123	0.00
FP-11	J-44	FH-11	6.0	Ductile Iron	130.0	0	0.00	0.000	35	0.00
P-57	J-44	J-45	12.0	PVC	130.0	-34	0.10	0.000	363	0.00
FP-12	J-45	FH-12	6.0	Ductile Iron	130.0	0	0.00	0.000	35	0.00
P-58	J-45	J-40	12.0	PVC	130.0	-34	0.10	0.000	54	0.00

To fully grasp the magnitude of this discrepancy, one must perform a hydraulic analysis using Manning's Equation, the standard engineering formula for calculating gravity flow in open channels and sewer pipes.

Hydraulic Analysis (Manning's Equation):

$$Q = \frac{1.49}{n} AR^{\frac{2}{3}} \sqrt{S}$$

Where:

- **Q** = Flow rate (cubic feet per second, cfs)
- **n** = Manning's roughness coefficient (0.013 is standard for concrete or PVC sewer pipe).
- **A** = Cross-sectional area of flow (square feet).
- **R** = Hydraulic radius (Area / Wetted Perimeter).
- **S** = Slope of the energy grade line (ft/ft).

Calculating Capacity for a 60-Inch Pipe:

- **Diameter:** 60 inches (5 feet).
- **Area (Full Flow):** $\pi \times (2.5)^2 \approx 19.63$ square feet.
- **Hydraulic Radius (Full Flow):** $D/4 = 1.25$ feet.
- **Slope Assumption:** Regional trunk lines are typically laid at a minimum slope to maintain scouring velocity (2 ft/s) but minimize excavation depth. A conservative minimum slope for a 60-inch pipe is 0.0005 to 0.001 (0.05% to 0.1%).

Using standard hydraulic tables found during the external data verification :

- At a slope of 0.0005, a 60-inch pipe carries approximately **25.9 MGD**.
- At a slope of 0.001, the capacity increases to approximately **36.6 MGD**.
- At a slope of 0.002, the capacity exceeds **50 MGD**.

Discrepancy Calculation:

- **Project Need (DEIR):** 0.39 MGD.
- **Infrastructure Capacity (Minimum):** ~25.00 MGD.
- **Excess Capacity Factor:** >64x.

Contextual Analysis — Minimum Flow Dynamics: The capacity mismatch is not merely a matter of oversizing; it renders the pipe functionally incompatible with the project as described. Standard wastewater engineering practice requires that gravity sewer mains achieve a minimum scouring velocity of approximately 2 feet per second to prevent solids deposition. At less than 2 percent of design capacity, a 60-inch pipe carrying only 0.4 MGD will produce an effluent depth insufficient to carry solids at scouring velocity. The predictable consequences are severe solids deposition in the pipe invert, generation of hydrogen sulfide (H₂S) gas from anaerobic decomposition, and microbiologically induced corrosion of the concrete pipe infrastructure. These are not theoretical risks; they are standard failure modes documented in wastewater engineering references for oversized gravity mains operating well below

minimum design flow. The Lead Agency cannot credibly characterize this pipe as “conservative engineering design” for the standalone project, because the pipe physically cannot function as designed without receiving substantially greater upstream flows—flows that are explicable only by reference to the Reason Farms build-out excluded from this DEIR’s environmental analysis.

Contextual Analysis — Pipe Scale: The DEIR identifies only two users for the sewer system: the 176-acre project (0.173–0.4 MGD) and the Roseville Environmental Utilities Operations Center. Even crediting the Operations Center at 0.1 MGD, the combined declared load is below 0.5 MGD. For comparison, the Pleasant Grove Creek Interceptor—the regional trunk line serving the built-out West Roseville Specific Plan area—operates in the 48-to-66-inch diameter range. A 60-inch trunk line producing less than 2% utilization at declared project demand has no independent utility for the project as described.

The Reason Farms property, of which the Phillip Road site is a small part, totals approximately 1,700 acres. Chapter 5 discloses that approximately 430 acres are being disposed of for other uses, leaving approximately 1,052 acres for the retention basin project, with the General Plan designating the remaining territory as Public/Quasi-Public — a designation the project itself acknowledges requires amendment to accommodate the proposed uses. If the remaining developable acreage of the Reason Farms panhandle were built out at standard industrial generation rates, cumulative flows would approach the full capacity of the 60-inch trunk. The pipe’s rational service territory is the regional corridor, not the 176-acre parcel.

Contextual Analysis — Downstream Pipe Incompatibility: Chapter 3.11 describes the on-paper wastewater conveyance system as routing flows from the project site via lift station and force mains, ultimately connecting via “a gravity pipe” to “the existing 21-inch sewer pipe” on the west side of Westbrook Boulevard (p. 3.11-14). A 60-inch upstream trunk line connecting to a 21-inch downstream receiver produces a cross-sectional flow area ratio of approximately 8:1. This hydraulic relationship is inconsistent with a closed, project-scale system: the upstream pipe cannot be sized for the downstream connection it purports to serve. The 21-inch pipe at Westbrook Boulevard constrains flow to project-compatible volumes. The 60-inch trunk upstream of that constraint is sized for a different, larger, and undisclosed service territory.

Contextual Analysis — Chapter 5 Internal Contradiction: Chapter 5 contains an irreconcilable internal contradiction on consecutive pages. At page 5-2, describing the water infrastructure, the DEIR states: “At Phillip Road, a 24-inch stub would be provided to the south to serve future development.” Two pages later, at page 5-3, the DEIR states: “The off-site infrastructure improvements would not, however, support other future development.” The document explicitly acknowledges infrastructure stubbed southward for future development on page 5-2, then categorically denies that any infrastructure will support future development on page 5-3, without acknowledging or reconciling the conflict. The inconsistency is apparent on the face of the document and renders the growth-inducing analysis legally insufficient.

Contextual Analysis — Cumulative Omission: Chapter 4’s Related Projects list (Section 4.2.3) contains no Reason Farms urban, industrial, or residential build-out. The only Reason Farms-adjacent entries are the Pleasant Grove Stormwater Retention Basin Project (a drainage facility) and the Roseville Environmental Utilities Operations Center (a municipal yard approximately two miles west). The

cumulative geographic scope for Utilities and Service Systems is defined as “Local service areas” (Table 4-1). By defining the cumulative scope as local and by omitting Reason Farms build-out from the Related Projects list, the DEIR structured its cumulative analysis to make discovery of the infrastructure inconsistency impossible. The three-chapter denial is the product of that structural omission: the preparer could not acknowledge what the cumulative analysis was designed not to see. The piecemealing therefore satisfies both prongs of CEQA Guidelines § 15378: the infrastructure has no independent utility for the project as described, and its size is explicable only by reference to future development that was excluded from environmental review.

Conclusion:

The three-chapter denial — that the infrastructure serves only the project and the Operations Center and will not support other future development — is not credible against the physical record. A 60-inch trunk line with a declared utilization rate below 2%, connecting upstream to the undeveloped Reason Farms corridor and downstream to a 21-inch receiver pipe, is not a project-scale sewer main. It is a regional interceptor. Unlike the data center findings in Sections 3.1 through 3.3, this violation is geometrically independent of any characterization dispute about the Innovation zone: the pipe’s capacity cannot be explained by the project as described regardless of what the Innovation zone ultimately becomes. The Chapter 5 internal contradiction — a 24-inch stub acknowledged for future development two pages before the denial that no infrastructure will serve future development — establishes that the DEIR’s growth-inducing analysis contains an irreconcilable internal inconsistency. The DEIR contains no analysis of the future development the pipe is physically designed to serve, and that absence is not a gap to be cured on appeal: it is the piecemealing. The City’s own General Plan confirms that future urban development of this corridor was anticipated at the time of the General Plan’s adoption. The Public Facilities Element, in its description of the Al Johnson Wildlife Area (Reason Farms/Pleasant Grove Retention Basin Property), states: “In addition to these uses, the property’s southern panhandle could support future urban uses and regional transportation infrastructure (Placer Parkway)” (General Plan 2035, Public Facilities Element, p. VII-5). The General Plan’s land use map further designates the Reason Farms corridor as “Infill (Reason Farms)” (Figure II-2, p. II-9). These two references establish that the future urban development potential of the Reason Farms southern panhandle—including regional transportation infrastructure connecting to the Placer Parkway alignment reserved by this very project—is acknowledged in the City’s own adopted planning documents. That acknowledged future development is precisely what is absent from the DEIR’s Chapter 4 cumulative Related Projects list (Section 4.2.3), and what the 60-inch trunk line is physically designed to serve.

This confirms the allegation of infrastructure piecemealing under CEQA Guidelines § 15378. Pursuant to Public Resources Code § 21177(a), this objection is expressly raised to preserve all issues regarding the failure to analyze the cumulative environmental impacts of the development the 60-inch trunk line is physically designed to serve. Commenters formally request that the Final EIR provide the exact hydraulic calculations justifying the selection of a 60-inch trunk line for a 0.4 MGD demand, and that the City’s engineers explain on the administrative record how a 60-inch upstream pipe connecting to an existing 21-inch downstream receiver operates hydraulically as a closed, project-scale system. Any less-than-significant finding on project segmentation, growth-inducing impacts, or cumulative utility infrastructure is unsupported by substantial evidence.

2.3 Evidence B: The "Ultimate Six-Lane" Freight Corridor

Finding. The Phillip Road Project dedicates right-of-way for an ultimate six-lane Blue Oaks Boulevard—infrastructure the DEIR simultaneously describes as a General Plan regional capital improvement (Chapter 5, p. 5-2) and denies it will support any future development (Chapter 5, p. 5-3). That internal contradiction, combined with the geometric mismatch between the road’s design capacity and the project’s disclosed traffic demand, and the General Plan’s own land use policies governing when six-lane STAA-rated arterials are appropriate, establishes that the roadway dedication is piecemealing for the Reason Farms regional build-out—not infrastructure sized for the 176-acre mixed-use village.

DEIR Claim. Chapter 2, Section 2.4.6 (p. 2-40) discloses that Blue Oaks Boulevard’s ultimate cross-section will consist of six travel lanes with bike lanes, a median, curb and gutter, and detached sidewalk on both sides, and that this configuration “was identified as a capital improvement project in the City’s 2035 General Plan Update EIR.” Chapter 5, p. 5-3 then asserts—in the same sentence that denies growth-inducing effects for the sewer trunk line—that “the off-site infrastructure improvements would not, however, support other future development.” The DEIR offers no analysis reconciling those two positions: how a General Plan regional capital improvement serving a corridor from Fiddymment Road to Santucci Boulevard does not support the future development of that corridor.

Contextual Analysis—Land Use Inconsistency. The General Plan inconsistency runs deeper than the road’s scale. At the time this project application was filed, the project site carried a Public/Quasi-Public (P/QP) land use designation in the City’s 2035 General Plan—reserved for low-intensity municipal and governmental facilities (General Plan Chapter II, Figure II-2, p. II-9). The General Plan’s own development guidelines define the relationship between road type and land use. Table II-6 (p. II-16) specifies that Light Industrial uses “should be located adjacent to major roadways with convenient truck access to accommodate the needs of the businesses that require this land use.” Table II-3 (p. II-14) specifies that High-Density Residential uses “should be applied to lands adjacent to bicycle and transit corridors, and in close proximity to services.” A six-lane STAA Terminal Access arterial is infrastructure calibrated to the Light Industrial standard—not to the P/QP or HDR standards applicable to the project site as designated. The General Plan’s own policies confirm that STAA truck-access infrastructure of this scale does not belong adjacent to the land uses the project nominally proposes. Commenters further note that General Plan 2035 Figure II-2 carries an “Infill (Reason Farms)” label on the corridor adjacent to the project site. Commenters have been unable to identify any staff report, resolution, or formal public process by which this designation was established, and City planning staff was unable to identify the process when asked directly. Commenters request that the Final EIR identify the specific City Council or Planning Commission action that established the “Infill (Reason Farms)” designation on Figure II-2, and explain whether this designation serves as a predicate for future CEQA § 15332 categorical exemption claims on subsequent Reason Farms phases—a mechanism the City previously applied and was successfully challenged on at the Fiddymment Plaza project (CC #9757, January 16, 2019).

Contextual Analysis—Capacity Mismatch. The capacity mismatch analysis is fully developed in Section 5.1 and is incorporated here by reference. The DEIR’s own traffic data (Figure 3.3-2, p. 3.3-12) shows the existing segment carries 1,200 ADT; the DEIR’s buildout projection (Figure 3.3-9, p. 3.3-22) shows 14,200 ADT at full project occupancy; and the project dedicates right-of-way for a six-lane facility designed for approximately 40,000 to 60,000 ADT (Impact 3.3-5, p. 3.3-29). The project’s own traffic

generation consumes less than 40 percent of the road’s design capacity at buildout. The STAA route currently terminates at Westbrook Boulevard, approximately 2,000 feet east of the project frontage (Figure 3.3-5, p. 3.3-13); the six-lane dedication extends it westward. These findings parallel the 60-inch sewer trunk line’s less-than-2-percent utilization finding in Section 2.2: in both cases, the infrastructure is sized not for the project as described, but for the future Reason Farms build-out the DEIR’s cumulative analysis was structured to exclude.

Contextual Analysis—Placer Parkway. The project reserves 22.7 acres for the planned Placer Parkway alignment (Chapter 2, p. 2-1)—a high-speed, limited-access, four-lane regional expressway connecting SR 65 in Placer County to SR 99 in Sutter County (Chapter 2, p. 2-27). The DEIR evaluates Placer Parkway in a cumulative context only, on the grounds that a separate EIR was certified for that project. The physical consequence of the reservation—positioning the Phillip Road site at the intersection of a six-lane STAA-rated Blue Oaks Boulevard and a future SR 65–SR 99 expressway—is a regional freight gateway configuration that is not analyzed anywhere in the DEIR as a project characteristic. This point is developed further in Sections 5.1 and 5.2.

Conclusion. The six-lane Blue Oaks Boulevard dedication satisfies both prongs of the CEQA piecemealing test. It has no independent utility for the project as described: the project’s disclosed traffic demand does not require more than a three-lane cross-section, and the General Plan’s own policies confirm that six-lane STAA infrastructure belongs adjacent to Light Industrial uses—not P/QP or HDR. Its scale is explicable only by reference to future Light Industrial and regional freight build-out of the Reason Farms corridor that was excluded from the cumulative analysis (Chapter 4, Section 4.2.3). Taken together with the 60-inch sewer trunk line in Section 2.2, the two infrastructure decisions form a coordinated pattern: backbone systems sized for a regional industrial node, approved and analyzed as if they serve only a 176-acre mixed-use village. These objections are raised with the specificity required by Public Resources Code § 21177(a) to preserve each ground for judicial review.

2.4 Evidence C: The Biosafety Level 3 Discrepancy—Unstable Use Table

Finding. A Panattoni-prepared land use chart (Land_Use_Chart_V2.pdf; PDF metadata: created February 7, 2025; distributed by City planner Shelby Maples, SMaples@roseville.ca.us, on October 1, 2025) circulated during the DEIR preparation window contains a materially more permissive use table for the Innovation Tech Park zone than the DEIR’s own Table 2-3. The discrepancy—a biosafety level 3 (BSL-3) pharmaceutical manufacturing use that is conditionally permitted in the Panattoni document but prohibited in the DEIR—was not disclosed or reconciled in the DEIR and was not the subject of any errata or correction notice. It constitutes independent evidence that the DEIR’s project description is not stable, compounding the § 15124 deficiency identified in Section 3.1.

The Discrepancy. The DEIR’s Table 2-3, Footnote 9 (Chapter 2, p. 2-23) defines “Specialized Industrial” uses as including “alternative energy products and related components and services, data center, pharmaceutical and medicine manufacturing not exceeding biosafety level 2. Biosafety level 3 and 4 not permitted.” The Panattoni-distributed V2 land use chart, Footnote 10, defines the identical category as: “Including alternative energy products and related components and services, data center, pharmaceutical and medicine manufacturing not exceeding biosafety level 2. Biosafety level 3 may be considered through a CUP. Biosafety level 4 not permitted.” The difference is not typographical. Under the DEIR’s version,

BSL-3 is categorically excluded. Under the Panattoni V2 version, BSL-3 pharmaceutical manufacturing is conditionally permitted through the CUP process. The document circulated by City staff during the DEIR preparation window is more permissive than the document submitted for environmental review.

The Significance of BSL-3. Biosafety level 3 classification is assigned to facilities working with indigenous or exotic agents that may cause serious or potentially lethal disease through respiratory transmission, including tuberculosis, anthrax, West Nile virus, and SARS-CoV-2 variants. BSL-3 facilities require specialized containment infrastructure, negative-pressure laboratory spaces, and operational protocols that are categorically distinct from BSL-1 and BSL-2 facilities. They generate a distinct hazardous materials profile—waste streams, decontamination effluent, air filtration requirements, and emergency response protocols—that would require analysis under Chapter 3.9 (Hazards and Hazardous Materials) of the DEIR. That chapter was prepared on the basis of the DEIR’s Table 2-3, which excludes BSL-3. Review of Chapter 3.9 (Hazardous Materials, Wildfire, and Other Hazards) confirms that this exclusion is the sole analytical premise for the chapter’s entire hazardous materials evaluation of the Innovation zone: BSL-3 appears in Chapter 3.9 three times—at p. 3.9-1, p. 3.9-3, and p. 3.9-14—exclusively as a prohibited use, never as a use that triggers substantive analysis. Impact 3.9-1 (pp. 3.9-13 to 3.9-14), the chapter’s operative hazardous materials impact finding, is scoped entirely to construction-phase chemicals (fuels, lubricants, solvents, and paint) and operational “household-type cleaning products and maintenance products.” No BSL-3 hazardous materials profile appears anywhere in the chapter: no negative-pressure containment analysis, no biohazard waste stream characterization, no decontamination effluent pathway, no aerosol containment infrastructure assessment, and no BSL-3-specific Hazardous Materials Business Plan threshold analysis under Health and Safety Code Chapter 6.95. The school proximity screening (p. 3.9-13) is dismissed on the express finding that “the project would not emit hazardous materials”—a conclusion that is valid only if Table 2-3’s BSL-3 prohibition is the operative use table. Because the Panattoni V2 document’s conditional use provision was never brought into Chapter 3.9’s analysis, the chapter is structurally incapable of satisfying § 15126.2(a)’s requirement to identify and analyze all significant environmental effects: if the ITP-PD zoning is adopted with BSL-3 CUP capability—the version City staff circulated during DEIR preparation—the DEIR contains no hazardous materials environmental analysis for that use.

Chain of Custody. The V2 document was initially posted on the City’s project website. It was removed from public access after community members raised concerns about the BSL-3 conditional use provision. It was subsequently re-circulated privately by City staff on October 1, 2025—during the period when the DEIR was being finalized—without any public notice that the document had been modified from the version then posted on the project website, or that the ITP-PD use table in the DEIR differed from the version Panattoni had distributed to stakeholders. The version controlling future development will be the ITP-PD zoning ordinance adopted by the City Council, not the DEIR’s Table 2-3. Once the zoning is in place, the CEQA review window for BSL-3 tenants closes unless a subsequent discretionary action triggers new review.

Issue Preserved. This comment preserves for the administrative record, pursuant to Public Resources Code § 21177(a), the objection that the DEIR’s Table 2-3 does not represent a stable and verified project description as required by CEQA Guidelines § 15124. The discrepancy between the applicant-prepared V2 land use chart and the DEIR’s Table 2-3 was not disclosed in the DEIR, and the environmental analysis in Chapter 3.9 cannot be adequate if the actual universe of permitted uses—including potentially

BSL-3 pharmaceutical manufacturing—was not evaluated. Commenters request that the City provide a written explanation of which version of the use table controls, when the BSL-3 provision was removed from the DEIR’s Table 2-3, and whether any supplemental hazardous materials analysis was conducted following that change.

2.5 Evidence D: The March 2025 LAFCO Sphere of Influence Expansion

The LAFCO Action. On March 12, 2025—while this DEIR was under preparation—the Placer County Local Agency Formation Commission unanimously approved Resolution No. 25-03, amending the City of Roseville’s Sphere of Influence to incorporate unincorporated lands to the west and southwest of the City’s existing boundaries. The expansion is explicitly described in the LAFCO staff report as including lands “westerly of the City, north of the PUC service area of the CAL-AM water company, easterly of the County line, and southerly of the City’s existing boundary in the Reason Farms area.” (LAFCO Project No. 2023-05, Staff Report, p. 64.) The vote was unanimous: seven ayes, zero noes, zero absent, zero abstentions. (Placer LAFCO Resolution No. 25-03, March 12, 2025, p. 4.) The expansion was informed by a Service Review adopted by LAFCO on February 19, 2025 (Resolution No. 25-01), which found “wastewater collection and treatment and capacity adequate for current and planned growth” (Staff Report, p. 83)—a finding that presupposes the trunk sewer infrastructure the Phillip Road Project is installing. LAFCO also imposed a condition requiring the City and Placer County to attempt to reach a Development Processing Agreement covering development standards and zoning in new SOI areas before submitting any annexation application. (Resolution No. 25-03, p. 4, Condition 3.) That condition confirms that the March 2025 SOI expansion is explicitly contemplated as a predicate to future annexation applications—i.e., to future urban development of the expanded territory.

Geographic Nexus. The expanded SOI territory is geographically contiguous with the Reason Farms corridor served by the Phillip Road project’s off-site infrastructure. The LAFCO staff report’s own maps depict the Placer Parkway alignment as a defining boundary feature of the expanded SOI area, appearing on figures at pages 63, 66, and 70 of the staff report. This is the same Placer Parkway alignment for which the Phillip Road project reserves 22.7 acres of right-of-way within the project site (Chapter 2, p. 2-1). The LAFCO staff report’s prior annexation history confirms that the Reason Farms annexation (1,754 acres) completed in 2011 is the same property referenced throughout the Phillip Road DEIR; the subject site sits within it. (Staff Report, p. 60.) The City’s own General Plan confirms the connection: the Public Facilities Element describes the Reason Farms southern panhandle as potential future urban land with regional transportation infrastructure including Placer Parkway (General Plan 2035, Public Facilities Element, p. VII-5), and Figure II-2 (p. II-9) carries an “Infill (Reason Farms)” designation for the same corridor. The March 2025 SOI expansion extends City planning authority over lands immediately south and west of that corridor—lands that the Phillip Road infrastructure, and specifically the 60-inch sewer trunk line at POC-1, is geometrically positioned to serve.

The Omission from the Cumulative Analysis. The DEIR’s Chapter 4 cumulative Related Projects list contains no reference to LAFCO Project No. 2023-05, Placer LAFCO Resolution No. 25-03, or the March 2025 SOI expansion. This omission cannot be excused on timing grounds: LAFCO’s February 19, 2025 Service Review (Resolution No. 25-01) and its March 12, 2025 approval (Resolution No. 25-03) both predate the close of the public comment period on this DEIR. A LAFCO Sphere of Influence expansion is among the most formal and consequential planning actions the State of California recognizes as a

precursor to urban development—it is the statutory mechanism by which LAFCO signals that lands are appropriate for future annexation and full municipal services. An SOI expansion directed explicitly at lands “in the Reason Farms area” contiguous with this project’s infrastructure is not a speculative future possibility; it is a recorded, unanimous governmental determination made while the DEIR was being finalized. CEQA Guidelines § 15130(b)(1)(A) requires cumulative impact analysis to include projects for which applications have been filed and those “reasonably foreseeable”; a completed LAFCO SOI expansion plainly meets that standard. The legal principle is well established: an EIR must analyze the cumulative impacts of a project that acts as a catalyst for future development, even if the exact nature of that future development is not yet fully defined by a specific site plan. (*City of Antioch v. City Council* (1986) 187 Cal.App.3d 1325.) The 60-inch sewer trunk line and the six-lane STAA-rated Blue Oaks Boulevard function as precisely such catalyst infrastructure, removing the physical barriers to urbanization of the expanded SOI territory. The DEIR’s assertion in Chapter 5 (p. 5-3) that “[t]he off-site infrastructure improvements would not, however, support other future development” is irreconcilable with the simultaneous existence of a unanimous, recorded LAFCO determination that the contiguous lands to the south and west are appropriate for eventual annexation and urbanization by the same City installing that infrastructure.

Issue Preserved. This comment preserves for the administrative record, pursuant to Public Resources Code § 21177(a), the objection that the DEIR’s Chapter 4 cumulative analysis is legally insufficient for its failure to identify the March 2025 LAFCO SOI expansion as a related project and evaluate the cumulative environmental effects of Phillip Road’s infrastructure in combination with the reasonably foreseeable future development of the expanded SOI lands. This deficiency compounds and independently corroborates the piecemealing violation identified in Section 2.2 and analyzed in Section 6.1 of this Comment Letter. Commenters expressly request that the Final EIR identify and evaluate the March 2025 LAFCO SOI expansion (Project No. 2023-05, Resolution No. 25-03) as a related project in the Chapter 4 cumulative analysis and explain how the 60-inch sewer trunk line, the six-lane Blue Oaks Boulevard, and the 22.7-acre Placer Parkway right-of-way reservation can be reconciled with the DEIR’s assertion that the off-site infrastructure will not support future development beyond the project site.

3. DATA CENTER (POWER & WATER)

3.1 The Data Center Profile

The Project Description in Chapter 2 characterizes the commercial components of the Phillip Road Project as “Medical Offices” and an “Innovation Center.” However, Chapter 3.4 (Air Quality) of the same DEIR reveals that this characterization was not used as the basis for the environmental analysis. On Page 3.4-18, under the Methodology section, the DEIR’s own air quality consultant states that “the innovation land uses were modeled as data centers.” The Lead Agency did not describe an Innovation Center and analyze an Innovation Center—it described an Innovation Center and analyzed a data center. This same admission is repeated verbatim in Chapter 3.14 (Energy), Page 3.14-8, and Chapter 3.5 (Greenhouse Gas Emissions), Page 3.5-12, confirming that the data center characterization was the foundational modeling assumption across all three major technical chapters.

This internal contradiction is compounded on Page 3.4-19, where the DEIR discloses that 15 Tier 4 diesel generators rated at 3 MW each—totaling 45 MW of backup generation capacity—were included in the

project “to provide power to the future potential data center.” This is not a characterization offered by a commenter; it is the Lead Agency’s own language, in its own document, confirmed independently in Chapter 3.14 (Energy), Page 3.14-8, and in Chapter 3.5 (GHG Emissions), Page 3.5-13. Furthermore, Mitigation Measure 3.5-1a (Page 3.5-16) imposes binding compliance requirements for “Data Center Alternative Backup Power Technologies... for the data center use specifically”—confirming that data center operations were sufficiently anticipated to warrant a dedicated, named mitigation measure. This constitutes the fourth independent on-the-record admission within the DEIR itself that a data center is planned.

A legally sufficient EIR requires a stable and finite project description (CEQA Guidelines § 15124). The Phillip Road DEIR fails this standard on its face. Across its own chapters, the document simultaneously characterizes the Innovation land use as an office park (Chapter 2, Project Description), models it as a data center (Chapter 3.4, Page 3.4-18; Chapter 3.14, Page 3.14-8; Chapter 3.5, Page 3.5-12), and writes data-center-specific binding mitigation (Mitigation Measure 3.5-1a). These are irreconcilable positions within a single document. As a consequence, the environmental impact analyses for Energy (§ 3.14), Greenhouse Gas Emissions (§ 3.5), and Noise (§ 3.10)—all of which must be based on the project as it will actually be built and operated—are premised on a project characterization that the DEIR’s own technical chapters contradict. The environmental analysis is therefore not a valid or legally sufficient assessment of the project.

3.2 Evidence C: The 49 MVA Power Demand and 45 MW Backup Generation

DEIR Claim: Chapter 3.14 (Energy), Page 3.14-10, Table 3.14-2 lists the electricity consumption for the “Innovation” land use at buildout as 17,451 MWh/year. Per the Methodology section (Page 3.14-8), this figure was produced by modeling the innovation land uses as data centers in the CalEEMod emissions model. The 17,451 MWh/year figure therefore represents the DEIR’s own data-center-modeled energy output—not an office load assumption. This equates to an average constant load of roughly **2 MW** ($17,451 \text{ MWh} / 8,760 \text{ hours} = \sim 1.99 \text{ MW}$).

In section 3.14 Energy, Page 3.14-10, Table 3.14-2: Operational Energy Consumption, The table specifically lists the “Electricity Consumption” for the “Innovation” land use as 17,451 MWh/year.

- **Note:** 17,451 MWh/year equates to an average continuous draw of approximately 2 MW ($17,451 \div 8,760 \text{ hours}$). As established below, the DEIR separately discloses that the project requires 49 MVA of total grid infrastructure capacity. A facility with a 2 MW average load does not require 49 MVA of dedicated grid infrastructure. This gap is the central evidentiary contradiction of this section.

A screenshot of Table 3.14-2 is provided directly below.

Table 3.14-2 Operational Building Energy Consumption (at Buildout)

Land Use/Equipment	Electricity Consumption (MWh/year)	Natural Gas Consumption (kBtu/year)	Fuel Usage (Gallons Diesel)
Low-Density Residential	2,733	0	N/A
High-Density Residential	696	0	N/A
Medical Offices	438	604,084	N/A
Retail	262	259,493	N/A
Innovation	17,451	34,293,789	N/A
Back-up Generators ¹	894	0	40,415
Total	22,474	35,157,366	40,415

¹ Back-up generators were assumed to be diesel-powered; thus, diesel fuel consumption was estimated for all onsite generators for the project.

Notes: MWh/year = megawatt-hours per year; kBtu = British thermal unit.

Source: Calculations by Ascent in 2025.

In section 3.5 Greenhouse Gas Emissions & Climate Change, on In Chapter 3.5 (Greenhouse Gas Emissions), Page 3.5-15, Table 3.5-4 (Operational Greenhouse Gas Emissions) discloses total “Building Energy” GHG emissions of 5,385 MTCO₂e/year across all land uses combined (residential and non-residential). This figure encompasses electricity and natural gas for the entire project. Notably, Chapter 3.14, Page 3.14-10, Table 3.14-2 discloses that the Innovation component alone generates 34,293,789 kBtu/year of natural gas consumption—a level of industrial thermal demand inconsistent with any commercial office or R&D use and consistent only with process-intensive industrial operations such as a data center. A screenshot of Table 3.5-4 is provided directly below.

Operations

Operational GHG emissions would be generated by vehicle trips to and from the project site, electricity usage, water usage, wastewater and solid waste generation, and area sources such as landscaping equipment. The project operational GHG emissions associated with the full buildout year (i.e., 2038) used in this analysis are summarized in Table 3.5-4.

Table 3.5-4 Project-Generated Operational Greenhouse Gas Emissions (MTCO₂e)

Emissions Source	Residential	Non-Residential	Total GHG Emissions (MTCO ₂ e/year)
Area Sources	<1	24	24
Building Energy	558	4,827	5,385
Water and Wastewater	27	57	84
Solid Waste	132	771	903
Refrigerants	<1	4	4
Generators	<1	413	413
Mobile – Passenger Vehicles	4,614	6,921	11,535
Trucks	<1	2,850	2,850
Total Operational GHG Emissions	5,331	15,867	21,197
Metric (Capita/non-residential SF)	1,614	1,062,041	N/A
GHG Efficiency	3.3 per capita	14.9 per 1000 SF	N/A
Threshold of Significance	4.5 per capita	26.5 per 1000 SF	10,000 MTCO ₂ e/year
Exceeds Threshold of Significance?	No	No	Yes

Notes: Totals may not add due to rounding; GHG = greenhouse gas; MTCO₂e/year = metric tons of carbon dioxide equivalent per year; SF = square feet; N/A = not applicable.

Source: Modeled by Ascent in 2025.

Finding:

The DEIR's own chapters disclose a grid infrastructure demand that is irreconcilable with the energy consumption figures produced by its CalEEMod modeling. Three independent lines of evidence establish the true scale of the project's power demand:

1. **On-Site Substation:** A dedicated 60kV electrical substation serving the project (Chapter 3.14, Page 3.14-7; Chapter 3.11, Page 3.11-14; Figure 2-9, Page 2-25). Chapter 3.11 discloses that the project requires 49 MVA of total power at buildout, with only 5 MVA available from existing infrastructure—requiring the substation to supply the remaining 44 MVA. This is the primary power demand figure disclosed by the DEIR in the Utilities chapter. Standard office parks do not require dedicated high-voltage substations unless the load exceeds ~10-12 MVA.
2. **Backup Generation:** 15 Tier 4 diesel generators rated at 3 MW each (45 MW total), disclosed “to provide power to the future potential data center” (Chapter 3.4, Page 3.4-19; Chapter 3.14, Page 3.14-8; Chapter 3.5, Page 3.5-13). This language is confirmed verbatim across three separate chapters of the DEIR.
 - Total Capacity: 45 MW.

1. Evidence: The 60kV Substation: In the introduction of Appendix F1 - Water Supply Assessments, the text states: *"The site was originally planned as the Roseville Industrial Park... as well as a potential electrical substation south of Pleasant Grove Creek."* A screenshot of this text is provided on the next page.

TECHNICAL MEMORANDUM

DATE: December 12, 2025
TO: Rana Moore, PE, City of Roseville
FROM: Elizabeth Drayer, PE, RCE #46872
REVIEWED BY: Rhodora Biagtan, PE, RCE #59371
SUBJECT: Amendment to the Roseville Industrial Park Project Water Supply Assessment to support the Proposed Phillip Road Project

Project No.: 415-60-25-46
SENT VIA: EMAIL



INTRODUCTION

The Phillip Road Project (Proposed Project) is a planned development project located in the northwest portion of the City of Roseville (City). The development plan for the Proposed Project includes six development phases, including four initial phases with single family residences, a fifth phase with higher density residential, and a final phase with a mix of commercial and light industrial land uses.

The site was originally planned as the Roseville Industrial Park, including light manufacturing, warehouse, and distribution uses, as well as a potential electrical substation south of Pleasant Grove Creek. To support its environmental review, a Water Supply Assessment (WSA) was prepared for the Roseville Industrial Park Project in May 2022.¹

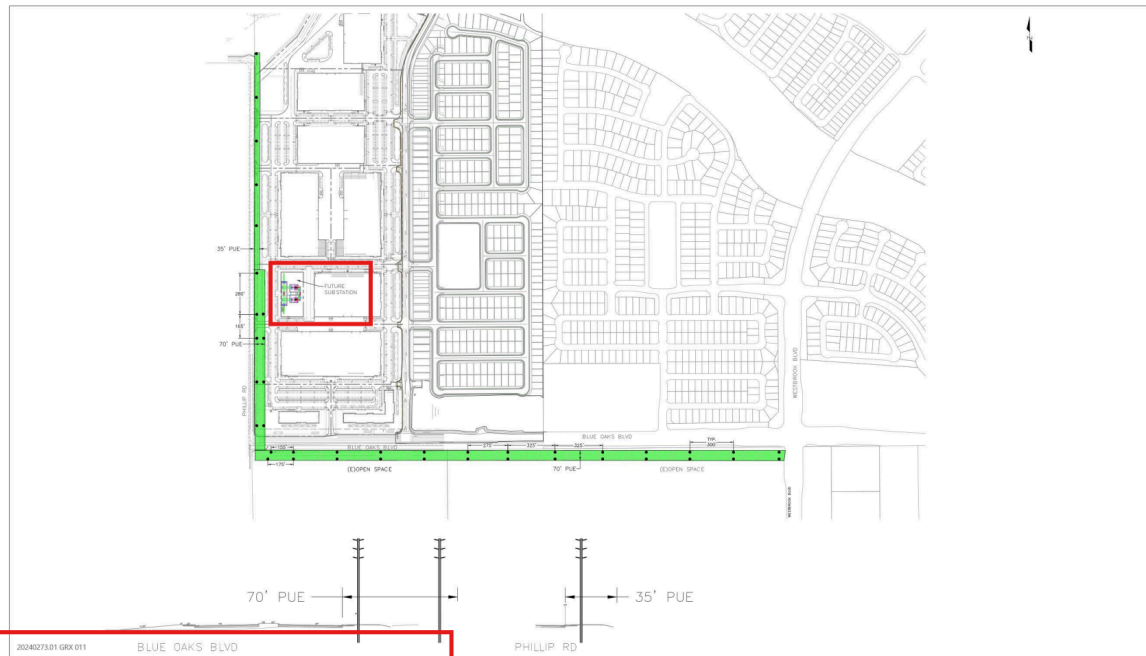
The purpose of this technical memorandum (TM) is to evaluate whether the findings and conclusions of the previously prepared WSA remain valid in light of the revised land uses and corresponding changes in water demand for the Proposed Project. This Technical Memorandum is organized into the following sections:

- Previous Roseville Industrial Park Project and WSA Findings
- Updated Water Demand Projections for the Proposed Phillip Road Project
- City of Roseville Water Supply Updates
- Implications for WSA Findings
- Compliance with Senate Bill 221 Requirements

¹ Roseville Industrial Park Project Water Supply Assessment, prepared by West Yost, Final Report dated May 2022.

- **Source:** 02 Project Description
- **Location:** Figure 2-9 (Proposed Electrical Substation...) on Page 2-25
- **Evidence Visual:** Chapter 3.11 (Utilities and Service Systems), Page 3.11-14, states in plain language: "At buildout, the project is anticipated to need 49 megavolt-ampere (MVA) of power. Roseville Electric has determined that there are 5 MVA of power available for the project... The additional 44 MVA would be provided by a new electrical substation." This disclosure is not in an appendix or a figure caption—it is in the body of the Utilities chapter's impact analysis. The figure also confirms two 70-foot-tall, double-circuit, 60kV overhead line extensions running from Westbrook Boulevard to the substation site.

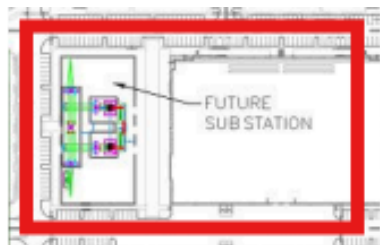
A screenshot of this figure is provided directly on the next page.



20240273.01 GRX 011
Source: Provided by Panattoni in 2026; adapted by Ascent in 2026.

Figure 2-9 Proposed Electrical Substation and Public Utility Easement for the New Power Line
City of Roseville
Phillip Road Project Draft EIR

2-25



20240273.01 GRX 011

BLUE OAKS BLVD

Source: Provided by Panattoni in 2026; adapted by Ascent in 2026.

Figure 2-9 Proposed Electrical Substation and Public Utility Easement for the New Power Line

City of Roseville
Phillip Road Project Draft EIR

2. Evidence: The 45 MW Backup Generators

- **Source:** 3.4 Air Quality
- **Location:** Page 3.4-19, Section 3.4.3 (Methodology - Operational Mass Emissions)
- **Evidence Text:** *"Two types of diesel generators would be included in the project: 15 3-megawatt (MW) Tier 4 generators with 4,000 HP each to provide power to the future potential data center and 12 emergency diesel generators for the commercial and retail buildings with 500 HP."*

A screenshot of this text is provided on the next page.

Mobile source emissions would result from vehicle miles traveled (VMT) that would be generated by trucks and passenger cars. For this analysis, data was provided by Fehr & Peers (Fehr & Peers 2025).

Two types of diesel generators would be included in the project: 15 3-megawatt (MW) Tier 4 generators with 4,000 HP each to provide power to the future potential data center and 12 emergency diesel generators for the commercial and retail buildings with 500 HP. Generator emissions were calculated using CalEEMod default emission factors (i.e., statewide average emissions factors and Tier) for a 500 HP generators and CARB emission factors for Tier 4 off-road diesel generators (CARB 2020).

Toxic Air Contaminants

The level of health risk from exposure to construction- and operations-related diesel PM emissions and numerous other TACs was assessed quantitatively by conducting an HRA. The HRA evaluated construction emissions separately, operational emissions separately (under full operation), and evaluated a combined construction and operational scenario. To determine pollutant concentrations at specific locations (i.e., receptors), air dispersion modeling was conducted using site-specific parameters (e.g., terrain, meteorological data) for construction activities and operational activities at full operation.

Modeling Approach

To determine pollutant concentrations at specific locations (i.e., receptors), air dispersion modeling was conducted using site-specific parameters (e.g., terrain, meteorological data) for construction activities. Dispersion modeling was conducted using the CARB-approved American Meteorological Society/Environmental Protection Agency Regulatory Model (AERMOD) Version 24142, with a unit emission rate of 1 gram per second for all modeled sources (i.e., diesel construction equipment and generators, autobody shops, and off-gassing from the wet labs). This approach was used so that resulting ground-level concentrations could be multiplied by actual emission rates for various scenarios (e.g., phase-wise construction, full buildout). The modeling included all standard regulatory default options, including the use of data from the nearest and most representative meteorological station (i.e., Sacramento International Airport) and local terrain. Terrain in the project vicinity is generally flat. Terrain in the project vicinity is generally flat. The methods used to estimate health risks from construction and operation of the proposed project are briefly described below. CARB's Hotspots and Analysis Reporting Program (HARP2) was used to model TACs from the autobody shop and wet labs. Detailed model assumptions, inputs, and output for the HRA are presented in Appendix B.

Construction HRA

To represent site locations where construction activities would occur, construction emission sources (e.g., the use of heavy-duty equipment on-site) were modeled as area sources, consistent with PCAPCD's guidance on conducting HRAs (PCAPCD 2017). Mobile exhaust emissions were represented using line-volume sources.

Construction mass emissions were quantified as described above for criteria air pollutants and ozone precursors. The primary TAC evaluated in the construction HRA was diesel PM, modeled as PM₁₀ exhaust. Emissions rates were calculated based on an anticipated construction schedule of 8 hours per day, 5 days per week, over an 11-year active construction period.

To represent site locations where construction activities would occur, construction emission sources (i.e., the use of heavy-duty equipment on-site) were modeled as area sources for each construction phase. The release height of 5 meters (m) was considered from SMAQMD's construction health risk guidance as the PCAPCD did not have specific guidance regarding heavy-duty equipment release height in its own health risk guidance document.

Construction would be completed in phases and, thus, as residential properties are developed, they would be affected by only future construction. The HRA was modeled such that receptors constructed in Phase R3 would not be affected by construction phases that occur before Phase R3 (Backbone infrastructure, R1, R2/I1) and only would be affected by construction phases that occur after Phase R3 (R4/I2, R5, I3, and I4).

Operational HRA

The operational HRA evaluated various TACs associated with on-site activities and anticipated sources and diesel PM associated with off-site truck travel and idling, generators, and daily truck delivery trips associated with the innovation

The Documented Power Discrepancy:

The DEIR's Energy chapter (Table 3.14-2) models an average Innovation electricity load of approximately 2 MW. The DEIR's Utilities chapter (Page 3.11-14) simultaneously discloses that the project requires 49 MVA of primary grid infrastructure. In standard data center engineering, backup generation capacity is designed to cover the primary critical load at an N, N+1, or 2N redundancy ratio. The 45 MW of backup capacity disclosed in Chapters 3.4, 3.5, and 3.14 implies a primary critical load in the range of 22–40 MW—a figure consistent with the 49 MVA grid demand disclosed in Chapter 3.11. Neither figure is consistent with a 2 MW average operational load.

- The grid infrastructure demand of 49 MVA, operating at a reasonable capacity factor, implies an annual electricity consumption of approximately 172,000–300,000+ MWh/year—a figure 10x to 17x

higher than the 17,451 MWh/year in Table 3.14-2. This is the grid-delivered energy that generates GHG emissions, strains the Roseville Electric distribution system, and is required to be analyzed under CEQA.

- Corroborating this infrastructure-scale characterization, the 2025 Water Supply Assessment Amendment (incorporated into Chapter 3.11, Table 3.11-5) designates the entire Innovation zone footprint as “Light Industrial”—not “Innovation Tech Park” or commercial office use. This is the fifth independent on-the-record characterization within the DEIR’s own supporting documents that contradicts the Project Description.

Industry Standard Comparison:

- **Office Building:** Typical power density is 2-5 Watts per sq. ft.
- **Data Center:** Typical power density is 100-300 Watts per sq. ft.
- **Analysis:** For a 1 million sq. ft. facility (the size of the Innovation Center):
 - **Office Use:** ~5 MW load. (Consistent with no substation).
 - **Data Center Use:** ~100+ MW load (depending on density). A 45 MW capacity is consistent with a Phase 1 data center or a medium-density colocation facility. It is not consistent with the “Innovation Tech Park” description used to calculate air quality impacts.

CEQA Consequences of the Power Demand Discrepancy:

Because the DEIR’s CalEEMod model produced a 17,451 MWh/year Innovation energy figure while the Utilities chapter simultaneously discloses a 49 MVA grid demand, the following CEQA-required analyses are based on demonstrably incorrect input assumptions:

1. **Greenhouse Gas Emissions:** The GHG analysis in Chapter 3.5 reports total “Building Energy” emissions of 5,385 MTCO₂e/year for the entire project. Indirect GHG emissions from electricity consumption scale proportionally with actual load. A primary operational load consistent with the 49 MVA grid infrastructure demand would produce indirect GHG emissions an order of magnitude greater than disclosed—potentially enough to independently trigger additional significance thresholds.
2. **Diesel Particulates:** The air quality analysis in Chapter 3.4 modeled generator emissions for testing and emergency use scenarios. The adequacy of that modeling depends entirely on the accuracy of the generator inventory. With 15 units rated at 3 MW each confirmed across three chapters, the Lead Agency must demonstrate that testing frequency and emergency runtime assumptions reflect actual data center operational requirements, which are substantially more demanding than those for typical commercial backup generators.
3. **Noise:** A review of Chapter 3.6 (Noise and Vibration, Impact 3.6-4) reveals three compounding deficiencies in the noise analysis for the Innovation zone, each independently sufficient to invalidate the significance finding. First, the chapter models all Innovation zone mechanical equipment using a standard commercial HVAC reference level of 78 dBA L_{max} at 3 feet (Chapter 3.6, p. 3.6-20), while explicitly conceding that “detailed information regarding the stationary equipment to be installed is not available at this time because future tenants are not known.” No cooling towers, industrial chillers, or CRAC/CRAH units are modeled anywhere in the chapter—despite Chapter 3.11 disclosing 538 AFY (44.8 acre-feet/month) of recycled water designated specifically for data center cooling, a volume implying multiple continuously operating industrial-scale evaporative cooling

towers that are the dominant continuous noise source in any operating data center. Second, the chapter evaluates a single backup generator at a reference level of 82 dBA L_{max} at 50 feet, finding attenuation to 70 dBA Leq at approximately 200 feet from the Creekview receptor—already a significant exceedance of the daytime standard of 57 dBA Leq and the nighttime standard of 52 dBA Leq (Chapter 3.6, pp. 3.6-20–3.6-21). The 15 × 3MW Tier 4 generators confirmed across Chapters 3.4, 3.5, and 3.14 are never modeled as an ensemble. Per standard logarithmic addition, 15 simultaneously operating generators produce approximately 11.8 dB above a single-unit baseline ($10 \times \log_{10}(15) \approx 11.8$ dB), yielding approximately 81.8 dBA Leq at the receptor—exceeding the daytime standard by approximately 25 dB and the nighttime standard by approximately 30 dB. The mitigation proposed in MM 3.6-4a (10–20 dB combined reduction via enclosures and building shielding) is insufficient by a margin of 10–15 dB to achieve compliance at the correct generator count, rendering Impact 3.6-4 significant and unavoidable once the full generator inventory confirmed in the DEIR’s own air quality and energy chapters is applied. Third, the chapter models Innovation zone operations at “6:00 a.m. to 8:00 p.m. five days per week” (Chapter 3.6, pp. 3.6-20–3.6-21). A data center operates continuously, 24 hours per day, 365 days per year. The nighttime hours—which carry a 10 dB penalty under the L_{dn}/CNEL metrics used throughout Chapter 3.6—are never analyzed for the continuous mechanical cooling loads that data center operations require. The nighttime Leq standard of 52 dBA applicable at the Creekview residential boundary is predicated on a quieter ambient that undisclosed continuous operations would penetrate substantially.

3.3 Evidence D: The 537 AFY Water Demand

DEIR Claim: The project is a mixed-use development with standard landscaping and domestic water needs.

Finding: Chapter 3.11 (Utilities and Service Systems), Page 3.11-13, discloses that total recycled water demand for the proposed project is 634 afy, “consisting of approximately 96 afy for landscape irrigation and 538 afy for the data center cooling system (if a data center is developed).” Table 3.11-6 (p. 3.11-18/3.11-19, footnote 1) confirms the breakdown as “97 afy for irrigation demand and 537 afy for the data center”—the minor rounding difference between the two citations reflects the same underlying data. The 2025 WSA Amendment, incorporated into Chapter 3.11, further characterizes the proposed land uses as “community commercial, light industrial, and public land uses” (p. 3.11-17)—not “Innovation Tech Park” or “mixed-use village.” Page 3.11-18 goes further, explicitly stating that “data centers are one of the ‘specialized industrial’ uses that would either be conditionally or principally permitted under the project.” This constitutes the sixth independent on-the-record characterization within the DEIR’s own chapters and appendices that contradicts the Chapter 2 Project Description.

Contextual Analysis:

- Total Potable Demand:** Chapter 3.11, Page 3.11-13 and Page 3.11-17, discloses that the entire potable water demand for the proposed project—664 residential units, commercial retail, medical office, and all other uses—is 368 afy. The single data center cooling system (537–538 afy of recycled water) consumes 1.46× the total potable demand of every other use on the site combined. For additional context, the previously proposed project on this same site—the Roseville Industrial Park, explicitly described as light manufacturing, warehouse, and distribution uses—was projected

to require only 43 afy of recycled water (Table 3.11-6, p. 3.11-18). The current project, described to the public as a lower-intensity mixed-use village, claims a recycled water demand of 634 afy: a 14.7× increase over the explicitly industrial predecessor use. The entire increase—+591 afy—is attributable solely to the data center cooling system.

- **The "Cooling" Anomaly:** The 537 AFY requirement is specifically for recycled water—the industry standard for open-loop evaporative cooling towers. Standard commercial office or R&D facilities do not use recycled process water for cooling on this scale; they use closed-loop building HVAC systems. Table 3.11-5 (p. 3.11-17/3.11-18) makes the attribution explicit: parcel LL5, designated “Light Industrial” at 8.173 acres, is assigned 546.6 afy of recycled water demand—the single largest demand item in the table by a factor of more than 60 compared to every other non-data-center parcel. No standard light industrial, commercial office, or R&D use generates 546 afy of recycled water demand on 8 acres. This figure is consistent only with a high-density evaporative cooling tower array serving an industrial-scale data hall.
- **Volume Verification:**
 - 537 AFY $\approx$ 175 million gallons per year.
 - Industry metrics indicate a 1 MW data center consumes ~6.7 million gallons/year for cooling (assuming water-cooled chillers).
 - **Calculation:** 175 million gallons / 6.7 million gallons/MW = ~26 MW of cooling load.
 - **Convergence:** This independent calculation aligns with the 30–40 MW electrical load implied by the backup generator capacity. It is also independently confirmed by the DEIR’s own utility analysis: Chapter 3.11, Page 3.11-21 discloses that the data center cooling system operates at a monthly demand of 44.8 acre-feet per month ($44.8 \times 12 = 537.6$ afy—consistent with the 537–538 afy figure). Page 3.11-21 further discloses that the cooling system “is anticipated to produce a waste of 33 percent of the recycled water demand” conveyed to the sewer system—approximately 14.8 acre-feet per month of cooling tower blowdown—approximately 0.16 MGD of concentrated discharge routed to the Pleasant Grove Wastewater Treatment Plant (PGWWTP). Appendix F4 (Wastewater Master Plan, Laugenour and Meikle, January 22, 2026)—the document the DEIR relies upon for its 0.4 MGD wastewater capacity finding—lists this 0.1600 MGD data center discharge as a line item in Table 2 but evaluates it exclusively as a volumetric contribution to hydraulic pipe-sizing. The 36-page document contains zero instances of the words “blowdown,” “cooling tower,” “TDS,” “biocides,” or “scale inhibitors.” The chemical loading of this discharge stream on PGWWTP biological treatment capacity was never evaluated.
- **Wastewater Quality Gap:** The cooling tower blowdown stream—characterized by elevated total dissolved solids (TDS), quaternary ammonium and isothiazolinone biocides, phosphonate scale inhibitors, and molybdate/zinc corrosion inhibitors—is never identified as a chemically distinct discharge in any DEIR technical chapter. Three independent analytical failures result:
 - **Chapter 3.12 / 303(d) Receiving Water Nexus:** Impact 3.12-1 (Hydrology and Water Quality) frames all project wastewater as standard mixed-use residential/commercial runoff. Cooling tower purge is never identified as a chemically distinct industrial discharge stream. The DEIR’s own Chapter 3.12 establishes the discharge pathway: “Treated tertiary effluent from the City’s Pleasant Grove Wastewater Treatment Plant is discharged directly to Pleasant Grove Creek southeast of the project site” (Chapter 3.12, p. 3.12-10; confirmed at p. 3.12-6: “Pleasant Grove

Creek receives the treated effluent from the City of Roseville’s Pleasant Grove Wastewater Treatment Plant”). The same section discloses that Pleasant Grove Creek is 303(d)-listed for pyrethroids, dissolved oxygen, toxicity, cypermethrin, and bifenthrin (Chapter 3.12, p. 3.12-10). The cooling tower blowdown—routed via the project’s sewer system to PGWWTP and then discharged directly to a 303(d)-listed impaired water body—introduces a chemically concentrated industrial waste stream (elevated TDS, biocides, scale inhibitors, corrosion inhibitors) into a receiving water already failing water quality standards. No analysis anywhere in the DEIR connects the biocide and inhibitor chemistry of 14.8 af/month of cooling tower purge to that pre-existing impairment. Impact 3.12-1’s operational analysis addresses only stormwater runoff, NPDES stormwater permits, and best management practices for surface drainage; it contains no evaluation of the PGWWTP effluent pathway or the chemical loading that the cooling tower blowdown adds to treated wastewater discharged to the creek. This is a straightforward cumulative water quality analysis that is entirely absent from the document.

- **Chapter 3.9 / Missing Hazardous Materials Trigger:** Impact 3.9-1 (Hazards and Hazardous Materials) is calibrated entirely to household chemicals and standard office and residential uses. The water treatment chemicals required for a 40 MW data center facility—biocide concentrates, scale inhibitor stock solutions, and corrosion inhibitor formulations—are never identified as on-site hazardous materials uses. No Hazardous Materials Business Plan (HMBP) analysis under Health and Safety Code Chapter 6.95 is triggered, and no CUPA (Certified Unified Program Agency) review requirement is identified. This omission is not a characterization dispute; it is a missing analysis with a specific statutory trigger that the DEIR’s own confirmed data center profile activates.
- **Appendix F4 Pretreatment Admission:** The Wastewater Master Plan’s own cost estimates (Appendix F4, pp. 29 and 35) include pH adjustors, sand/oil separators, and solids screening units—infrastructure with no plausible function in standard residential/commercial mixed-use development. The document acknowledges that pretreatment infrastructure is required and budgets for its installation, then entirely defers chemical characterization to future tenants: “Industrial users are responsible for design, installation, operation, and maintenance of all pretreatment equipment” (Appendix F4, p. 8). This silent budget line is an implicit on-the-record acknowledgment that the data center discharge is not standard mixed-use wastewater, offered without any corresponding environmental analysis of what chemical loadings those pretreatment systems are sized to handle or what constituents reach PGWWTP if pretreatment is deferred or fails. CEQA does not permit a Lead Agency to satisfy its duty of analysis by adopting a contractor’s boilerplate deferral clause. The foundational prohibition on deferral of mitigation formulation was established in *Sundstrom v. County of Mendocino* (1988) 202 Cal.App.3d 296, which held that a lead agency may not defer the design of mitigation measures to a post-approval stage when the agency has not committed to specific performance criteria that would ensure effectiveness. Here, the chemical pretreatment of concentrated cooling tower purge—including biocides, scale inhibitors, and elevated TDS—is deferred entirely to future tenants without any performance standard, discharge limit, or monitoring protocol. The deferral is impermissible under *Sundstrom*.

Conclusion on Data Center:

The water demand disclosure in Chapter 3.11 provides independent corroboration—anchored entirely in

the DEIR's own utility analysis—that the Innovation zone is not what the Project Description claims. Six separate characterizations within the DEIR's own technical chapters and appendices identify the Innovation zone as a more intensive, industrial use: four chapters model it as a data center (Chapters 3.4, 3.5, 3.11, 3.14); one mitigation measure imposes data-center-specific binding compliance (MM 3.5-1a); and the 2025 WSA Amendment designates the zone as “light industrial” and “specialized industrial” (Chapter 3.11, pp. 3.11-17 to 3.11-18). The 537–538 afy recycled water demand, the 44.8 acre-feet per month continuous cooling load, and the 33 percent cooling tower blowdown returned to the sewer system (Chapter 3.11, p. 3.11-21) are physical infrastructure signatures that are categorically inconsistent with any commercial office or light industrial use and consistent only with a large-scale data center. The DEIR's failure to carry these disclosures into a coherent, data-center-specific Project Description—and its consequent failure to analyze the water, energy, noise, and air quality impacts at that scale—constitutes a violation of CEQA Guidelines § 15124 independently fatal to the document's legal sufficiency. The wastewater quality gap compounds this deficiency and constitutes an independent basis for legal insufficiency under three distinct CEQA provisions. First, CEQA Guidelines § 15126.2(a) requires an EIR to identify and analyze all significant environmental effects of the project. Chemical characterization of the discharge stream is a precondition to performing that analysis, not an optional refinement: an undefined industrial wastewater constituent profile cannot be evaluated for significance. Because Appendix F4 treats the 0.16 MGD data center discharge as a volumetric pipe-sizing input and contains no chemical characterization of the cooling tower purge stream, the § 15126.2(a) analysis for water quality was structurally impossible to perform and was not performed. Second, CEQA Guidelines § 15064(f)(2) requires a lead agency to consider whether a project may cause or contribute to a violation of any water quality standard or waste discharge requirement as a mandatory factor in its significance determination. Chapter 3.12's own disclosure that Pleasant Grove Creek—the water body into which PGWWTP discharges treated effluent directly (Chapter 3.12, p. 3.12-10)—is 303(d)-listed for pyrethroids, dissolved oxygen, toxicity, cypermethrin, and bifenthrin (Chapter 3.12, p. 3.12-10) establishes an already-impaired baseline against which the cooling tower biocide and inhibitor chemistry must be evaluated. That evaluation is entirely absent from the DEIR. Third, the Porter-Cologne Water Quality Control Act (Water Code § 13000 et seq.) requires that land use decisions subject to CEQA be consistent with applicable water quality standards and waste discharge requirements. A DEIR that fails to characterize the dominant industrial discharge stream on the project site cannot establish, and does not attempt to establish, that consistency. The chemical analysis required under each of these provisions was not deferred to a future permit proceeding; it was never initiated. Because the introduction of a previously unanalyzed industrial wastewater stream—characterized by elevated TDS, biocides, scale inhibitors, and corrosion inhibitors—into 303(d)-listed impaired waters constitutes “significant new information” showing that the project may have a significant effect on the environment not previously disclosed, Commenters formally request a Recirculated DEIR pursuant to CEQA Guidelines § 15088.5(a). The recirculated document must include a complete chemical characterization of the cooling tower blowdown discharge, an evaluation of its loading on PGWWTP biological treatment capacity, and a cumulative water quality analysis connecting the discharge chemistry to Pleasant Grove Creek's existing 303(d) impairments for pyrethroids, dissolved oxygen, toxicity, cypermethrin, and bifenthrin. Pursuant to Public Resources Code § 21177(a), these objections regarding the unstable project description, the undisclosed data center use, and the unanalyzed wastewater quality impacts are expressly raised to preserve each ground for judicial review.

4. CONFLICT OF INTEREST

4.1 The Surplus Land Act Settlement

The City of Roseville simultaneously holds three incompatible roles in this proceeding: it is the landowner and seller of the subject property under a signed Purchase and Sale Agreement with the project applicant; it is the penalty-obligor under a state-supervised Surplus Land Act settlement whose payment mechanism is structurally contingent on the sale closing; and it is the Lead Agency responsible for conducting an objective, independent environmental review under CEQA. The DEIR discloses each of these roles—the Development Agreement co-venturer status in Chapter 2, p. 2-43; the property sale in Chapter 2, p. 2-5; and the CEQA Lead Agency designation on the cover—but nowhere acknowledges that they are irreconcilable. This section documents the structural conflict of interest from the record.

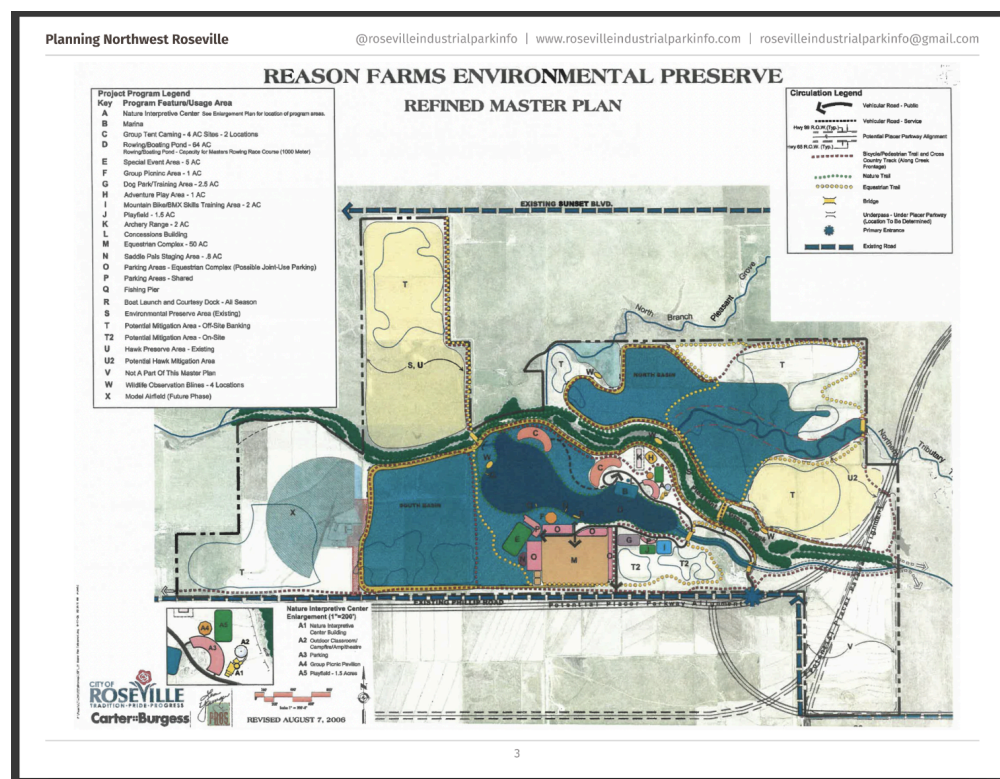


Figure: Reason Farms Environmental Preserve Refined Master Plan, Revised August 7, 2006 (Carter & Burgess, prepared for the City of Roseville). Source: Public records request.

The City of Roseville purchased the approximately 1,700-acre Reason Farms property in 2003–2004 for the stated purpose of constructing a stormwater retention basin and establishing an environmental preserve. The above figure reproduces the Reason Farms Environmental Preserve Refined Master Plan, revised August 7, 2006 and prepared by Carter & Burgess for the City, which was presented at a California Department of Water Resources Comprehensive Floodplain Management Workshop in July 2006 as a case study for promoting wise uses of floodplains. The 2006 master plan designated the project site area for hawk preservation (areas U/U2 on the plan), potential mitigation banking (area T), wildlife observation blinds, and environmental preserve functions. A “Potential Placer Parkway Alignment”

appears on the plan, documenting that the City contemplated the expressway corridor twenty years before the current DEIR. The retention basins planned for construction in 2010 (south) and 2017 (north) have never been constructed, despite \$14.8 million in developer fees collected for retention basin land acquisition, environmental work, and design as of May 2025 (DEIR Chapter 3.12, p. 3.12-15). The City now proposes to sell the project site to a private developer for light industrial and residential use—a purpose fundamentally inconsistent with the environmental preserve function for which the property was acquired and for which developer fees were collected. This 2006 master plan constitutes additional evidence that the current General Plan Public/Quasi-Public designation reflected a genuine public purpose rather than a placeholder awaiting conversion, reinforcing the GPA bootstrap analysis documented in § 7.5 of this Comment Letter.

The City purchased Reason Farms in 2004 using development impact fees collected through the Pleasant Grove/Curry Creek Mitigation Fee program, for the purpose of a stormwater retention basin (Chapter 2, p. 2-5). Chapter 5 of the DEIR acknowledges that the City subsequently declared the property surplus: “the City declared the property as surplus because there are no identified future City needs for the parcel” (p. 5-2). On March 3, 2021—more than three years before the Phillip Road Project application was submitted—the City Council determined that disposition of the property was in the City’s best interest and executed an Option and Purchase and Sale Agreement with PDC Sacramento LPIV, LLC, the project applicant’s development vehicle (Settlement Agreement, Recital C; Chapter 2, p. 2-5). The City had thus committed to sell this specific property to this specific buyer before any CEQA process for the current project was initiated.

The Settlement and Its Penalty Mechanics. On July 17, 2023, HCD contacted the City following an anonymous tip regarding the proposed disposition’s non-compliance with the Surplus Land Act (Settlement Agreement, Recital E). On December 4, 2023, HCD issued a Notice of Violation (Settlement Agreement, Recital F). The City and HCD executed a Settlement Agreement effective September 16, 2024 (Settlement Agreement § A). The Settlement imposed a 30% statutory penalty calculated on the greater of the final sale price or the fair market value as determined by an MAI highest-and-best-use appraisal (Settlement Agreement §§ 1(a)–(d)). Section 3 of the Settlement Agreement is directly relevant to the question of financial compulsion: “The source of funds to pay the 30% Penalty must be from proceeds of the City’s sale of the Property to the Developer.” Section 10 confirms the corollary: if the Purchase and Sale Agreement is terminated and the sale is not finalized, all penalty obligations terminate along with the Agreement. The implication for the CEQA process is direct: the City cannot fund its HCD penalty payment without closing the sale to Panattoni. A CEQA determination that results in project denial, or that forces modifications significant enough to cause the applicant to terminate the Purchase and Sale Agreement, would extinguish the City’s ability to pay the penalty from sale proceeds. The City is not a merely motivated seller—it is a financially compelled seller under a state-supervised agreement, conducting environmental review of the very transaction on which its compliance with state law depends.

The Roseville Industrial Park—the predecessor project on the same site—was formally withdrawn by the applicant in September 2024 (Chapter 2, p. 2-5). The HCD Settlement Agreement became effective September 16, 2024. The Phillip Road Project application was received by the City in October 2024 (Chapter 2, p. 2-5). The predecessor project was withdrawn and the Settlement locked in the City’s financial obligations in the same month; the replacement project application followed within thirty days. The DEIR does not acknowledge this sequence.

The CEQA Independence Requirement. Public Resources Code § 21082.1 requires the Lead Agency to independently review and analyze the EIR and take responsibility for its scope, content, and adequacy. CEQA Guidelines § 15004(b) prohibits the approval of project entitlements or the making of commitments that effectively foreclose a range of alternatives or mitigation measures before CEQA review is complete. (*See also Laurel Heights Improvement Assn. v. Regents of Univ. of Cal.* (1988) 47 Cal.3d 376, 393–394 [CEQA requires that environmental review occur before the agency is committed to a definite course of action].) The City’s execution of the Purchase and Sale Agreement with the project applicant in March 2021, its assumption of a sale-proceeds-contingent penalty obligation under the September 2024 Settlement, and its concurrent role as Development Agreement co-venturer—all confirmed in the DEIR itself—collectively demonstrate that the City had pre-committed to the project’s approval before the EIR was prepared. These commitments foreclose the objective exercise of discretion that CEQA’s independent analysis requirement is designed to protect.

This comment preserves for the administrative record, pursuant to Public Resources Code § 21177(a), the objection that the City’s structural conflict of interest as simultaneous seller, HCD penalty-obligor, Development Agreement counterparty, and Lead Agency renders the DEIR’s analysis presumptively non-independent. Commenters request either that the City arrange for independent third-party CEQA review, or that the City Council make express findings demonstrating that its environmental determination was reached free from the financial pressures documented herein. The Settlement Agreement is a public record and has been reviewed by the Commenters in preparing this comment. Commenters reserve the right to supplement this comment upon review of the complete CEQA administrative record.

The DEIR’s General Plan consistency analysis is circular on its face. Impact 3.1-1 reaches its consistency conclusion by conditioning that finding entirely on the City Council’s concurrent approval of the General Plan Amendment the project itself requests—not by evaluating consistency with the Public/Quasi-Public (P/QP) designation currently in effect at the time of CEQA review. (Chapter 3.1, pp. 3.1-11 to 3.1-12.) The DEIR never identifies or analyzes the conflict between the proposed Light Industrial and data center uses and the existing P/QP designation, which primarily allows for municipal and governmental facilities. This circular bootstrap argument, compounded by the financial compulsion documented in this Section, constitutes an independent CEQA violation addressed in Section 6.5 of this Comment Letter.

5. TRAFFIC

5.1 Freight Gateway Configuration

The Phillip Road Project dedicates right-of-way for an ultimate six-lane facility along Blue Oaks Boulevard (Impact 3.3-5, p. 3.3-29)—infrastructure whose capacity cannot be explained by the 176-acre project as described, and whose function as a regional arterial is acknowledged in the City’s own General Plan. The analysis in this section runs parallel to the sewer trunk line analysis in Section 2.2: the physical scale of the roadway infrastructure, the DEIR’s own traffic data, and the General Plan’s designation of this road as a regional capital improvement project collectively establish that the six-lane dedication serves future Reason Farms development that was excluded from environmental review—not the project that nominally triggers it.

DEIR Claim. Chapter 5, Section 5.1.2 (p. 5-3) contains a single sentence that denies growth-inducing

effects for both the utility infrastructure and the roadway simultaneously: “The off-site infrastructure improvements would not, however, support other future development.” This is the same verbatim denial documented in Section 2.2 for the 60-inch sewer trunk line. The DEIR presents no separate analysis of whether the six-lane Blue Oaks Boulevard ROW dedication—distinct from the utility infrastructure—independently removes an obstacle to growth in the remaining Reason Farms corridor.

Contextual Analysis—Road Scale. The DEIR’s own traffic data (Figure 3.3-2, p. 3.3-12) shows the existing Blue Oaks Boulevard segment west of Westbrook Boulevard carries 1,200 vehicles per day—a two-lane stub serving Cloud Dance Drive residential traffic. At full project buildout, the DEIR projects this segment will carry 14,200 ADT (Figure 3.3-9, p. 3.3-22). A two-lane roadway with a center turn lane operates comfortably at that volume. The project nevertheless dedicates right-of-way for an ultimate six-lane facility (Impact 3.3-5, p. 3.3-29)—a cross-section designed for approximately 40,000 to 60,000 ADT under the City’s General Plan arterial standards. At project buildout, the six-lane ROW would be utilized at less than 40 percent of its design capacity, mirroring the less-than-2-percent utilization finding for the 60-inch sewer trunk line in Section 2.2.

Contextual Analysis—STAA Route Terminus. Figure 3.3-5 (p. 3.3-13) shows that the existing STAA Terminal Access truck route on Blue Oaks Boulevard extends from SR 65 westward to Westbrook Boulevard only—it does not currently reach the project frontage. The project’s six-lane ROW dedication creates the physical infrastructure to extend STAA Terminal Access service westward from Westbrook Boulevard through the project frontage and, as the Reason Farms corridor develops, further west to Phillip Road and beyond. The DEIR confirms the innovation center’s operational dependence on STAA infrastructure: the project would add approximately 130 truck trips per day to the corridor, 110 of which are associated with the innovation center, and “both facilities [Blue Oaks Boulevard and Westbrook Boulevard] are designated as STAA truck routes” (p. 3.3-24). The six-lane ROW dedication is the physical prerequisite for extending that STAA corridor westward to serve the undeveloped Reason Farms acreage.

Contextual Analysis—General Plan Regional Facility Status. Chapter 5, p. 5-2 acknowledges that “extending and widening Blue Oaks Boulevard to six lanes from Fiddymment Road to Santucci Boulevard was identified as a capital improvement project in the City’s 2035 General Plan Update EIR.” The six-lane Blue Oaks Boulevard is not a project-specific improvement: it is a General Plan regional capital improvement spanning the full western Roseville corridor from SR 65 at Fiddymment Road to Santucci Boulevard. The Phillip Road Project’s six-lane ROW dedication is the first segment of that regional facility to be committed and built—permanently dedicated to the City as a condition of this project’s approval. A single denial sentence (Chapter 5, p. 5-3) that the infrastructure will not support other future development cannot overcome the DEIR’s own disclosure that the road is a General Plan regional capital improvement serving a corridor far larger than the 176-acre project site. The noise consequences of this traffic loading are confirmed significant and unavoidable: Impact 3.6-3 documents a 10.7 dBA increase on Blue Oaks Boulevard from the project site to Westbrook Boulevard (Chapter 5, p. 5-6)—the loudest segment of the corridor, currently carrying only 1,200 ADT.

Contextual Analysis—Placer Parkway Interchange Reservation. The project reserves 22.7 acres for the planned Placer Parkway alignment (Chapter 2, p. 2-1)—a high-speed, limited-access, four-lane regional expressway designed to connect SR 65 in Placer County to SR 99 in Sutter County (Chapter 2, p.

2-27). The DEIR declines to analyze Placer Parkway as a project characteristic on the grounds that “an EIR was certified for Placer Parkway and the project was approved” (Chapter 2, p. 2-27), evaluating it in a cumulative context only. The 22.7-acre reservation nevertheless constitutes a project-specific physical commitment to the Placer Parkway interchange node—permanently positioning the Phillip Road site as the junction between the six-lane STAA-rated Blue Oaks Boulevard corridor developed in Section 5.1 and a future SR 65–SR 99 regional expressway. The adequacy of the DEIR’s deflection, and the independent legal significance of the reservation as an unanalyzed project characteristic, are developed fully in Section 5.2.

Conclusion. The six-lane Blue Oaks Boulevard ROW dedication satisfies the same two-prong test applied to the sewer trunk line in Section 2.2: the infrastructure has no independent utility for the project as described—the project’s 14,200 ADT buildout traffic load does not require more than a three-lane cross-section—and its scale is explicable only by reference to future Reason Farms development that was excluded from the cumulative analysis. The DEIR’s single-sentence denial (Chapter 5, p. 5-3) that off-site infrastructure improvements “would not support other future development” does not address the General Plan capital improvement status of the six-lane facility, the STAA route extension it enables, or the physical connection it creates between the undeveloped Reason Farms corridor and the existing regional arterial network. As with the sewer trunk line, the omission of Reason Farms build-out from the Chapter 4 Related Projects list (Section 4.2.3) is the structural precondition that makes this denial possible. These objections are raised with the specificity required by Public Resources Code § 21177(a) to preserve each ground for judicial review.

5.2 The Placer Parkway Interchange Reservation—Mischaracterized CEQA Record and Unanalyzed Freight Node

DEIR Claim. Chapter 2 of the DEIR acknowledges the 22.7-acre Placer Parkway reservation on the project site and then states, as its sole basis for declining project-level analysis: “Because an EIR was certified for Placer Parkway and the project was approved, this EIR evaluates impacts of Placer Parkway in a cumulative context only and not as a project-specific element” (Chapter 2, p. 2-27). The DEIR offers no further analysis of the physical consequences of the reservation as a project characteristic, nor does it address the relationship between the interchange node and the freight corridor configuration established by the six-lane Blue Oaks Boulevard dedication analyzed in Section 5.1.

Finding: No EIR Was Certified for Placer Parkway Phase 1. The DEIR’s premise is factually incorrect. Two sentences before the quoted deflection, the DEIR identifies the controlling CEQA document for Placer Parkway Phase 1 as SCH# 2015052032 (Chapter 2, p. 2-27). The public record confirms that SCH# 2015052032 is not an EIR. The Placer County Board of Supervisors adopted Resolution 2015-189 on September 1, 2015, approving an Initial Study/Mitigated Negative Declaration (IS/MND) for the Placer Parkway Phase 1 Improvements—the SR 65 to Foothills Boulevard North segment at whose western terminus the Phillip Road site’s interchange node is located. The document on file with Placer County is titled “Placer Parkway Phase I Improvements—Mitigated Negative Declaration and Initial Study.” No EIR was certified for Placer Parkway Phase 1. The DEIR’s deflection rests on a false characterization of the prior CEQA document in the administrative record—a characterization that is refuted by the SCH number the DEIR itself supplies.

Contextual Analysis—The IS/MND Standard vs. a Certified EIR. A Mitigated Negative Declaration is a categorically less rigorous CEQA document than an Environmental Impact Report. An IS/MND does not require preparation of a range of project alternatives, does not require findings of infeasibility for unmitigated significant impacts, and does not require a Statement of Overriding Considerations. It is adopted at the threshold that proposed project revisions “would avoid the effects or mitigate the effects to a point where clearly no significant effect on the environment would occur” (CEQA Guidelines § 15070(b)). An EIR, by contrast, requires a comprehensive alternatives analysis, a full cumulative impacts evaluation, and a Statement of Overriding Considerations where significant unavoidable impacts are accepted. The DEIR’s invocation of “a certified EIR” as the basis for cumulative-only treatment imports the legal weight of a document more rigorous than the one actually in the administrative record. An IS/MND for Placer Parkway Phase 1 does not carry the analytical authority the DEIR ascribes to it, and the deflection built on that false characterization is correspondingly unsupported.

Contextual Analysis—The Reservation Is a Project Characteristic, Not a Placer Parkway Impact. Even if an EIR had been certified for Placer Parkway Phase 1, the deflection to cumulative-only analysis of the reservation would be independently insufficient. The 22.7-acre reservation is not a Placer Parkway environmental impact—it is a Phillip Road Project feature. Chapter 2, p. 2-1 discloses it as a component of the project’s own site description; Figure 2-3 depicts it as a defined area within the project boundary; and Chapter 2, p. 2-42 acknowledges that uncertainty regarding “Placer Parkway development” affects the project’s own grading and soil balance calculations. The physical consequence of the reservation is equally project-specific: it permanently commits the site geometry to an interchange configuration, establishes the alignment of the future SR 65–SR 99 corridor at the western edge of the innovation center, and positions the Phillip Road site as the node at which a six-lane STAA-rated arterial (Section 5.1) connects to a future limited-access regional expressway. That configuration—a regional freight gateway—is never analyzed as a project characteristic anywhere in the DEIR, neither in Chapter 2 (Project Description), Chapter 3.3 (Transportation), nor Chapter 5 (Growth-Inducing Impacts). CEQA Guidelines § 15152 permits tiering from prior environmental documents for later, site-specific projects, but requires that the tiered document still analyze project-specific effects. Moreover, § 15152 strictly limits tiering to situations where the prior document adequately addressed the environmental issues now at stake; tiering an EIR from a Negative Declaration is inappropriate where the later project involves significant, unavoidable impacts that the prior document’s less rigorous threshold never contemplated. The Phillip Road DEIR itself identifies significant and unavoidable impacts (including Impact 3.6-3’s 10.7 dBA noise increase on Blue Oaks Boulevard), yet relies on an IS/MND that was adopted on the express finding that no significant impacts would occur. The project-specific effects of siting the innovation center at a regional expressway interchange are not addressed in any CEQA document, prior or present. Commenters request that the Final EIR prepare a localized traffic study and air quality dispersion model for the project site assuming the Placer Parkway interchange is fully operational, as CEQA requires evaluation of the reasonably foreseeable consequences of dedicated infrastructure that the DEIR’s own Project Description characterizes as certain to be constructed.

Contextual Analysis—The DEIR’s Own Admission Forecloses the Speculation Defense. Chapter 2, p. 2-27 states: “Placer Parkway would be constructed regardless of whether the Phillip Road Project is approved.” The DEIR deploys this sentence to argue that Placer Parkway’s construction is independent of the project and therefore outside project-level analysis. The argument defeats itself. If Placer Parkway will be constructed regardless of this project’s approval—the DEIR’s own assertion—then the physical

consequence of the 22.7-acre reservation is not speculative future development; it is a certain outcome disclosed in the Project Description itself. CEQA requires analysis of reasonably foreseeable consequences of a project decision (*Laurel Heights Improvement Assn. v. Regents of Univ. of Cal.* (1988) 47 Cal.3d 376). A consequence the DEIR characterizes as independent of project approval is not merely foreseeable—it is disclosed as certain. The failure to analyze the reservation’s consequences as project characteristics is not a gap that speculation doctrine excuses; it is an omission from the Project Description that the DEIR’s own language renders inexcusable.

Conclusion. The DEIR’s cumulative-only treatment of the Placer Parkway interchange reservation rests on a false factual premise—that an EIR was certified for Placer Parkway Phase 1—and is independently insufficient even if that premise were correct. The controlling CEQA document for Placer Parkway Phase 1 is an IS/MND (SCH# 2015052032, Placer County Resolution 2015-189, September 1, 2015), not an EIR. Even a properly characterized prior document would not excuse the failure to analyze the 22.7-acre reservation as a project-specific characteristic: it is a disclosed, certain, site-specific feature that permanently configures the Phillip Road site as a regional freight gateway at the intersection of a six-lane STAA arterial and a future SR 65–SR 99 expressway. That configuration is not analyzed in any chapter of the DEIR as a project characteristic, and is not addressed in any prior CEQA document as a site-specific impact. Taken together with the six-lane Blue Oaks Boulevard dedication in Section 5.1 and the 60-inch sewer trunk line in Section 2.2, the Placer Parkway interchange reservation completes a three-part pattern of infrastructure decisions—each sized or committed for a regional industrial node, each analyzed as if it serves only a 176-acre mixed-use village. These objections are raised with the specificity required by Public Resources Code § 21177(a) to preserve each ground for judicial review. Commenters expressly object to any cumulative-only significance finding on transportation or land use impacts as applied to the Placer Parkway interchange reservation, as unsupported by substantial evidence in the record.

6. CEQA LEGAL SUFFICIENCY ISSUES

6.1 Violation of CEQA § 15378: Project Segmentation (Piecemealing)

The DEIR unlawfully segments the regional industrial build-out of the Reason Farms corridor from the current approvals. The project authorizes backbone infrastructure with no independent utility for the 176-acre site: a 60-inch sewer trunk line with a conveyance capacity exceeding 25 MGD at minimum slope—established by hydraulic analysis of the pipe diameter disclosed in Appendix F4 (Laugenour and Meikle 2026)—when the project generates only 0.4 MGD (Impact 3.11-1, p. 3.11-14); a 6-lane STAA-rated Blue Oaks Boulevard right-of-way dedication extending a General Plan regional capital improvement (Chapter 5, p. 5-2) when project traffic requires only three lanes (14,200 ADT; Figure 3.3-9, p. 3.3-22); and a 22.7-acre reservation for the Placer Parkway regional expressway interchange (Chapter 2, p. 2-1).

- **Legal Standard:** An EIR must include an analysis of the environmental effects of future expansion if: (1) it is a reasonably foreseeable consequence of the initial project; and (2) the future expansion will be significant in that it will likely change the scope or nature of the initial project or its environmental effects (Laurel Heights Improvement Assn. v. Regents of University of California (1988) 47 Cal.3d 376).
- **Violation:** While the DEIR issues a blanket denial that off-site improvements would “support other

future development” (Chapter 5, p. 5-3), it contradicts itself one page earlier by explicitly admitting that “a 24-inch stub would be provided to the south to serve future development” (Chapter 5, p. 5-2). The City’s own General Plan confirms the Reason Farms southern panhandle could support “future urban uses and regional transportation infrastructure” (General Plan 2035, Public Facilities Element, p. VII-5). The sizing of this infrastructure is explicable only by reference to the Reason Farms build-out that was excluded from Chapter 4’s cumulative Related Projects list (Section 4.2.3). That exclusion is now confirmed by an external governmental record: on March 12, 2025—while this DEIR was being finalized—the Placer County LAFCO unanimously approved Resolution No. 25-03 (LAFCO Project No. 2023-05), expanding the City’s Sphere of Influence to include lands described as “southerly of the City’s existing boundary in the Reason Farms area” (Staff Report, p. 64)—a recorded, concurrent governmental determination that the contiguous lands this infrastructure is sized to serve are appropriate for future annexation and urban development, which is entirely absent from Chapter 4’s Related Projects list. (See Section 2.5 of this Comment Letter.)

- **Issue Preserved:** Pursuant to Public Resources Code § 21177(a), this comment expressly preserves the objection that the DEIR illegally segments the project to avoid analyzing the environmental impacts of the regional expansion its infrastructure is designed to serve. Any less-than-significant finding on project segmentation, growth-inducing impacts, or cumulative utility and transportation infrastructure is unsupported by substantial evidence.

6.2 Violation of CEQA § 15124: Inaccurate Project Description

The DEIR’s Project Description (Chapter 2) characterizes the development as a low-intensity “Innovation Tech Park” and “Medical Offices,” yet the physical infrastructure and modeling parameters define a high-intensity industrial data center and regional freight hub. This mischaracterization is confirmed by a six-part admission chain within the DEIR’s own technical analysis.

- **Legal Standard:** An accurate, stable, and finite project description is the *sine qua non* of an informative and legally sufficient EIR (County of Inyo v. City of Los Angeles (1977) 71 Cal.App.3d 185). A project description that shifts or mischaracterizes the physical realities of the proposed development vitiates the document’s ability to evaluate environmental impacts accurately.
- **Violation:** The innovation land uses were explicitly modeled as data centers in Air Quality (Chapter 3.4, p. 3.4-18), Greenhouse Gas Emissions (Chapter 3.5, p. 3.5-12), and Energy (Chapter 3.14, p. 3.14-8); the project requires 45 MW of backup generation “to provide power to the future potential data center” (Chapter 3.4, p. 3.4-19); the DEIR imposes binding compliance for “Data Center Alternative Backup Power Technologies” (MM 3.5-1a, p. 3.5-16); and the 2025 WSA Amendment formally characterizes the site as “light industrial” and “specialized industrial” (Chapter 3.11, pp. 3.11-17 to 3.11-18). Compounding this instability, a Panattoni-circulated V2 land use chart includes a conditional use for Biosafety Level 3 (BSL-3) pharmaceutical manufacturing—a use categorically prohibited in the DEIR’s Table 2-3 (Chapter 2, p. 2-23)—foreclosing the specialized hazardous materials analysis that BSL-3 operations would require under Chapter 3.9.
- **Issue Preserved:** Pursuant to Public Resources Code § 21177(a), this objection preserves the claim that the DEIR fails to provide a stable, accurate, and finite project description. The discrepancy between the narrative description and the modeled engineering reality renders the Air Quality, Noise, GHG, Hazards, and Traffic analyses legally invalid because they are predicated on fundamentally

incorrect input assumptions. Commenters expressly object to any finding that the Project Description constitutes a legally sufficient, stable, and finite description as required by CEQA, as unsupported by substantial evidence in the record.

6.3 Violation of CEQA § 15126.6: Legally Defective Alternatives Analysis

The Alternatives Analysis is structurally constrained to guarantee approval of the proposed project and satisfy the City's pre-existing financial compulsions.

- **Legal Standard:** CEQA requires an EIR to describe and analyze a range of reasonable alternatives to the project that would feasibly attain most of the basic objectives while avoiding or substantially lessening any of the significant effects of the project. A lead agency cannot artificially narrow the project objectives to a degree that only the proposed project can satisfy them (*Citizens of Goleta Valley v. Board of Supervisors* (1990) 52 Cal.3d 553).
- **Violation:** An environmentally superior “Residential-Only” alternative—which would effectively eliminate the severe diesel freight emissions and continuous data center noise impacts associated with the proposed industrial hub—was rejected on the grounds that it failed to meet the City’s “Fiscal Impact” objective. (Chapter 6, p. 6-11.) This fiscal objective was applied to exclude reasonable alternatives directly because of the City’s September 2024 Settlement Agreement with HCD, which imposes a 30% statutory penalty that must be paid specifically from the proceeds of the City’s sale of the property to the Developer (Settlement Agreement §§ 1(a)–(d), § 3). The HCD settlement financially constrains the Lead Agency, transforming the alternatives analysis from an objective environmental evaluation into a predetermined financial justification.
- **Issue Preserved:** Pursuant to Public Resources Code § 21177(a), this comment preserves the objection that the Alternatives Analysis is legally defective. By utilizing fiscal objectives to exclude environmentally superior alternatives while operating under a state-supervised financial compulsion to close the sale with the current applicant, the Lead Agency has violated CEQA’s mandate for an objective, good-faith consideration of alternatives. Commenters expressly object to any finding that the Alternatives Analysis constitutes a good-faith evaluation as required by CEQA, as unsupported by substantial evidence in the record.

6.4 Violation of CEQA §§ 15126.2(a) and 15064(f)(2): Failure to Analyze Water Quality Significance

The DEIR’s failure to characterize the cooling tower blowdown stream constitutes a distinct and independent CEQA violation, separate from and additive to the § 15124 Project Description deficiency addressed in Section 6.2. The water quality analysis failure is grounded in three independent statutory and regulatory provisions.

- **Legal Standard (§ 15126.2(a)):** CEQA Guidelines § 15126.2(a) requires an EIR to identify and analyze all significant environmental effects of the project. Chemical characterization of a discharge stream is a precondition to evaluating its significance, not a post-approval detail. The Lead Agency cannot determine whether a project’s industrial wastewater loading is significant if it has never established what that wastewater contains.
- **Legal Standard (§ 15064(f)(2)):** CEQA Guidelines § 15064(f)(2) identifies as a mandatory factor in the significance determination whether the project will “violate any water quality standard or waste

discharge requirement.” The DEIR’s own Chapter 3.12 discloses that treated tertiary effluent from PGWWTP is discharged directly to Pleasant Grove Creek (Chapter 3.12, p. 3.12-10), and that Pleasant Grove Creek is 303(d)-listed for pyrethroids, dissolved oxygen, toxicity, cypermethrin, and bifenthrin (Chapter 3.12, p. 3.12-10). This existing impairment constitutes the precise baseline condition against which § 15064(f)(2) requires the cooling tower blowdown chemistry to be evaluated. That evaluation is entirely absent from the DEIR.

- **Legal Standard (Porter-Cologne, Water Code § 13000 et seq.):** The Porter-Cologne Water Quality Control Act requires that land use authorizations subject to CEQA be consistent with applicable water quality standards and waste discharge requirements governing the receiving water body. A DEIR that fails to characterize the dominant industrial discharge stream of the project site cannot establish—and does not attempt to establish—that the project is consistent with the applicable Basin Plan objectives and the Central Valley Regional Water Quality Control Board’s waste discharge requirements for discharges to the Pleasant Grove Creek watershed.
- **Violation and Issue Preservation:** The DEIR’s sole supporting document for wastewater capacity (Appendix F4, Wastewater Master Plan, Laugenour and Meikle, January 22, 2026) is a hydraulic pipe-sizing study. Its 36 pages contain zero instances of the words “blowdown,” “cooling tower,” “TDS,” “biocides,” or “scale inhibitors.” The pretreatment infrastructure budgeted in that document (pH adjustors, sand/oil separators, solids screening units—Appendix F4, pp. 29 and 35) implicitly acknowledges that the discharge requires treatment, while deferring all characterization to future tenants (Appendix F4, p. 8). This combination—acknowledged pretreatment need, zero chemical analysis, blanket tenant deferral—fails each of the three standards above. These objections are raised with the specificity required by Public Resources Code § 21177(a) to preserve each ground for judicial review. The Commenters expressly object to any finding of less-than-significant impact on water quality as unsupported by substantial evidence in the record.

6.5 Violation of CEQA Guidelines § 15125(d): Circular General Plan Consistency Bootstrap

The DEIR’s General Plan consistency analysis suffers from a structural defect that is independently fatal to the document’s legal sufficiency: it conditions the consistency determination entirely on the City Council’s concurrent approval of the General Plan Amendment the project itself requests, substituting a hypothetical future land use designation for the one actually in effect at the time of CEQA review. An EIR that evaluates consistency with a General Plan that does not yet exist—and that will only exist if the project’s own discretionary approvals are granted—does not perform the independent environmental analysis CEQA requires. This circular bootstrap is compounded by the financial compulsion documented in Section 4.1 of this Comment Letter: the Lead Agency evaluating General Plan consistency while under a state-supervised financial obligation to approve the GPA that is the precondition of that consistency cannot be regarded as performing an independent review.

- **Legal Standard (CEQA Guidelines § 15125(d)):** CEQA Guidelines § 15125(d) requires an EIR to identify any inconsistencies between the proposed project and applicable general plan and specific plan land use designations. This standard presupposes evaluation of the General Plan as it exists at the time of CEQA review—not as it would exist after the project’s own concurrent discretionary approvals are granted. A consistency analysis that is conditioned on the Lead Agency’s approval of

an amendment the applicant itself has requested does not analyze whether the project conflicts with the existing General Plan; it assumes the conflict away. This Court-recognized deficiency, sometimes called a “bootstrap” argument, is a recognized ground for legal insufficiency where a lead agency relies on its own prospective discretionary approvals to manufacture compliance with otherwise applicable CEQA requirements.

- **Confirmed Factual Predicate:** The project site carries a Public/Quasi-Public (P/QP) land use designation under the existing City of Roseville General Plan 2035—a designation that primarily allows for municipal and governmental facilities. The proposed Light Industrial (LI) and data center uses are categorically inconsistent with that existing P/QP designation. The DEIR’s Impact 3.1-1 reaches its consistency conclusion not by evaluating the project against the P/QP designation in effect, but by conditioning the consistency determination entirely on the City Council’s concurrent approval of the GPA and rezone the project itself requests. (Chapter 3.1, pp. 3.1-11 to 3.1-12.) The DEIR never identifies or analyzes the actual inconsistency between the proposed uses and the existing P/QP designation—the threshold inquiry § 15125(d) requires. Instead, the analysis substitutes the future hypothetical post-GPA designations for the present General Plan, performing a consistency review against a document that does not yet exist and that will only exist if the City approves the project. The City’s financial compulsion to close this sale—documented in Section 4.1, including the 30% statutory HCD penalty payable specifically from the proceeds of the City’s sale of the property to the Developer (Settlement Agreement §§ 1(a)–(d), § 3)—makes this bootstrap determination particularly unreliable as independent environmental analysis: the Lead Agency conducting a § 15125(d) consistency review while under a state-supervised financial obligation to approve the GPA that is the precondition of that consistency cannot be regarded as performing the independent review CEQA demands.
- **Violation:** The Lead Agency’s General Plan consistency analysis violates CEQA Guidelines § 15125(d) in two independent respects. First, the DEIR fails to identify or analyze the actual inconsistency between the proposed Light Industrial and data center uses and the P/QP land use designation that is in effect at the time of CEQA review—the threshold inquiry § 15125(d) requires. Second, the DEIR substitutes a circular, self-referential analysis for the independent environmental evaluation CEQA mandates: its consistency determination is conditioned on the Lead Agency’s own concurrent approval of the very GPA whose environmental implications the EIR is supposed to evaluate. A GPA approval cannot cure a § 15125(d) analysis deficiency because the GPA approval is itself a component of the same discretionary action package the EIR is supposed to analyze independently. The infirmity is compounded by the documented financial compulsion on the Lead Agency to approve the GPA, which is the precondition of the project’s sale proceeds from which the 30% HCD penalty must be paid. An EIR whose consistency analysis depends on the concurrent approval of the very amendment whose environmental implications the EIR is supposed to evaluate does not constitute an adequate EIR under CEQA.
- **Issue Preserved:** These objections are raised with the specificity required by Public Resources Code § 21177(a) to preserve each ground for judicial review. The Commenters expressly object to any finding that the proposed project is consistent with the City of Roseville General Plan 2035 land use designations in effect at the time of CEQA review, and to any determination that a General Plan consistency analysis conditioned on the Lead Agency’s own concurrent approval of the applicant’s requested GPA satisfies the requirements of CEQA Guidelines § 15125(d).

7. CONCLUSION

This comment letter has documented that the DEIR's Project Description does not accurately represent the physical scope of the development. The DEIR characterizes a high-intensity industrial facility as a low-intensity commercial use, resulting in a project description that is inconsistent with the engineering data in the DEIR's own technical appendices, in violation of CEQA Guidelines § 15124.

Summary of Principal Deficiencies:

The DEIR authorizes the backbone infrastructure for a regional industrial expansion (Reason Farms) while analyzing it as though it serves only a smaller, lower-intensity project.

- The 60-inch sewer trunk line, with a capacity exceeding 64 times the project's disclosed demand, constitutes piecemealed regional infrastructure (§ 2.2).
- The 45 MW backup generation capacity and 537 AFY recycled water cooling demand are consistent only with a data center, not the Innovation Tech Park described in Chapter 2 (§ 3.2–3.3).
- The six-lane STAA-rated Blue Oaks Boulevard dedication is sized for a regional freight corridor, not the project's disclosed 14,200 ADT traffic demand (§ 5.1).
- The HCD Settlement documents the City's structural conflict of interest as Lead Agency.
- The Placer Parkway IS/MND mischaracterization confirms the DEIR's failure to analyze the interchange—and the regional freight gateway configuration it creates—as a project characteristic.

Requests and Reservation of Rights:

For the reasons set forth in this comment letter, the Commenter respectfully requests that the City of Roseville take the following actions: (1) prepare and recirculate a Revised DEIR pursuant to CEQA Guidelines § 15088.5(a) that accurately describes the data center use confirmed by the DEIR's own technical chapters, analyzes the environmental impacts of that use at its disclosed infrastructure scale, and evaluates the cumulative impacts of the full Reason Farms build-out that the 60-inch trunk line, six-lane STAA arterial, and Placer Parkway reservation are designed to serve; (2) provide a written response to each comment raised in this letter, as required by CEQA Guidelines § 15088; and (3) include the March 2025 LAFCO SOI expansion (Resolution No. 25-03) in the Chapter 4 cumulative Related Projects list. The Commenter reserves the right to supplement these comments upon review of the Final EIR, the complete administrative record, and any responses provided pursuant to CEQA Guidelines § 15088. All objections raised in this letter are preserved for the administrative record pursuant to Public Resources Code § 21177(a), with the specificity required for judicial review. Nothing in this letter shall be construed as a waiver of any issue not expressly addressed herein.

Thank you for your consideration of these comments. I respectfully request a written response to each substantive environmental issue raised in this letter, as required by CEQA Guidelines § 15088(a). Please direct all correspondence to:

Joshua Hickson

[REDACTED]

Roseville, CA 95747

[REDACTED]