

[REDACTED], P.E., CPESC, QSD, QISP
[REDACTED]
Roseville, CA 95747

March 19, 2026

City of Roseville Development Services – Planning
Derek Ogden, Senior Planner
311 Vernon Street, Roseville, CA 95678
Telephone: (916) 774-1348; Fax: (916) 774-5129; Email: dogden@roseville.ca.us

Subject: **Phillips Road Project 2026 DEIR Comments**

Dear Mr. Ogden,

My name is [REDACTED], and I am a homeowner at [REDACTED] in West Roseville. I am also a California-licensed Civil Engineer with over 25 years' experience in the environmental field. I am writing to provide comments on the February 2026 draft environmental impact report (DEIR) that evaluates the environmental impacts of the proposed Phillip Road Project to be built at 6382 Phillip Road. I am concerned that the DEIR is not compliant with CEQA because projects must implement all feasible mitigation measures to reduce significant and unavoidable impacts (see California Public Resources Code § 21081; 14 CCR § 15126.2(b)). Feasible mitigation measures should include reducing the project size and/or modifying allowed operations. I have the following additional comments on the DEIR:

- **Executive Summary: Innovation Term Usage.** The DEIR states “Proposed uses include residential, retail, medical offices, and innovation center uses, as well as parks, open space, and trails.” The use of the word “innovation” to describe the use for the site is vague, political, and deceptive. Phillip Road Plan is proposing light industrial use and should clearly state that in all sections of documents, especially in the project description.
- **Light Industrial Uses:** In Section 2, please provide multiple examples of potential tenants, especially in the area designated for Light Industrial use. It is recognized that wet labs, autobody and paint booths, and data centers were used as representative tenants in the emissions calculations. Identification of potential tenants and brief descriptions of their operations would be helpful for the adjacent residential communities to understand the project’s potential impact to the community.
- **High Density Residential:** High density residential should be designated as condominiums and not apartments. Ownership benefits the community as those who own and occupy their home are more invested in the maintenance, appearance, and long-term value of the property and are shown to be more civically involved in their communities.
- **Section 3.3.** Please add what percentage of jobs created by the Phillips Road Project are expected to go to residents of West Roseville considering housing and pay scales. Please also

address if and how the proposed project complies with Roseville's General Plan Policy LU5.1 (General Plan, page II-29) "The Implementation Strategy to Achieve Blueprint Project Objectives and 2020 MTP/SCS objectives related to locating jobs in proximity to housing"

- **Air Quality (Section 3.4).** The emissions calculations and health risk modeling underestimates actual project impacts.
 - The assumption that natural gas will not be used in residences should be based on a legal requirement. Please add the justification for this and/or modify modeling to incorporate natural gas being used by residences for heat, stoves, and gas fireplaces. This requirement can be added as a mitigation to ensure it is enforced but should not be an assumption in the modeling because there is no assurance it will be implemented.
 - **Sensitive Receptors** (DEIR, Page 3.4-16). Sensitive land uses such as the soccer sports complex that is used by children off Westbrook Blvd should be added to the model or an explanation added to why it was not included.
 - **Construction HRA** (DEIR, page 3.4-19). The DEIR states that air dispersion modeling assumed "Construction hours would occur 8 hours per day and 5 days a week." (DEIR, page 3.4-19). These are not typical construction hours, and the DEIR states in other sections that construction hours would be 7:00 a.m. to 7:00 p.m. Monday through Friday, and that construction could also occur 8:00 a.m. to 8:00 p.m. on Saturdays and Sundays (DEIR, page 2-42; 3.6-18). The modeling should assume construction hours would occur 12 hours per day and 5 days per week, plus 50% of weekend hours.
 - **Operational HRA** (Page 3.4-19,20). Please state operational hours that were used in the modeling. It is not clearly stated in this section or Appendix B which operating hours were used in the calculations. The DEIR states that "Typical operational hours for the innovation center uses would be 6:00 a.m. to 8:00 p.m., 5 days per week. Typical operational hours for the commercial uses would be 5:00 a.m. to 10:00 p.m., 7 days per week.". Please ensure and document in the EIR that the modeling uses these stated operating hours.
 - **HRA:** The risk assessment does not calculate the risk for at least 10 percent of the residents who live longer than 30 years in the surrounding communities (and not necessarily in the same house for the entire period). The proposed project is located next to residences where a percentage of sensitive receptors will be exposed to pollutants for potentially a lifetime, especially due to longer life spans and due to multiple generations living in the same home or community such as families with adult children living with or near parents due to cost of living choices, aging parents, or disabled adult child/parent care. EPA guidance states that "National statistics are available on the upper-bound (90th percentile) and average (50th percentile) number of years spent by individuals at one residence (EPA 1989d). Because of the data on which they are based, these values may underestimate the actual time that someone might live in one residence. Nevertheless, the upper-bound value of 30 years can be used for exposure duration when calculating reasonable maximum residential exposures. In some cases, however, lifetime exposure (70 years by convention) may be a more appropriate assumption." (EPA, [Risk Assessment Guidance for Superfund Volume I Human Health Evaluation Manual \(Part](#)

- [A](#)), page 6-22). Therefore, the health risk assessment should be protective of all individuals and population risks and include calculations that assumes that a sensitive receptor living in the community would be exposed to emissions from both construction and operations for a lifetime of 70 years.
- Impact 3.4-4 should include mitigation measures that limit the permitted tenant operation and emissions so that they are less than the assumptions used in the modeling calculations (e.g., restricting the number of wet labs or other emission sources).
 - Mitigation Measure 3.4-4b should include limits on the number and type of generators permitted to be used so that it does not exceed the assumptions used in the emissions modeling calculations (DEIR, page 3.4-30-31).
 - **Section 3.6 Noise.** Nuisance noises (i.e., noise pollution) significantly lowers the quality of life, causes stress, and can have adverse psychosocial and physiological effects on human health and the environment ([envhper00468-0281.pdf \(nih.gov\)](#), [Noise-Pollution-Human-Health-A-Review.pdf \(researchgate.net\)](#)). The WHO states that “Noise is an underestimated threat that can cause a number of short- and long-term health problems, such as for example sleep disturbance, cardiovascular effects, poorer work and school performance, hearing impairment, etc.” The WHO also states that children and elderly people are more vulnerable to noise. According to the WHO, “Impairment of early childhood development and education caused by noise may have lifelong effects on academic achievement and health.” The WHO “strongly recommends reducing noise levels produced by road traffic below 53 decibels (dB) L_{den} , as road traffic noise above this level is associated with adverse health effects” ([WHO Environmental Noise Guidelines](#)). The General Plan Policy N1.2 states that residence interior noise levels should be no greater than 45 dBA Leq. The DEIR should discuss the proposed project’s impact on noise level compared to WHO guidelines and General Plan Policy N1.2 and the adverse health impacts. The DEIR should also use conservative assumptions to include the short- and long-term health problems from noise exposure.
 - The DEIR should include all operating noise simultaneously in combined noise level calculations. For example, several building HVAC systems and generators will likely operate simultaneously, so combined noise levels must be calculated. Mitigation measures should include limiting numbers and types of equipment that can be operating at one time and limiting operating hours.
 - Construction hours should be limited from 7:00 a.m. to 5:00 p.m. Monday through Friday and no construction allowed on Saturdays and Sundays.
 - The estimated noise reduction from mitigation measures may also be optimistic, as a case study of a 1,000 kW generator in generator room in the lowest level of a building has shown that even with significant noise control measures, the required distance between generator room and closest residential property would need to be more than 200 feet away to reduce noise levels to below 52 dBA ([ASHRAE Generator Noise](#)

[Presentation.PDF \(gsweventcenter.com\)](#)). The analysis should be conservative and apply the minimum end of noise reduction ranges for equipment.

- The noise mitigation measures proposed do not mitigate the significant impacts. This is not compliant with CEQA because projects must implement all feasible mitigation measures to reduce significant and unavoidable impacts (see California Public Resources Code § 21081; 14 CCR § 15126.2(b)). Mitigation measures should include reducing the project size, modifying allowed operations, additional noise barriers and muffling devices, and limiting operation hours. Implementing some of these measures (e.g., noise barrier) might require negotiating easements or land purchases with private property owners.
- **Impact 3.6-3.** Mitigation measures should include adding a sound wall to the south side of Blue Oaks Blvd, particularly west of Westbrook Blvd.
- **Impact 3.13-1 (DEIR, Page 13-18).** Aesthetics should be designated as having a significant impact. The DEIR states that “proposed landscaping would soften the mixed-use character of the project site”, however “softening” does not eliminate the light industrial character of the project site that is inconsistent with the surrounding residential communities. The proposed design includes features that are not visually consistent with the surrounding residential communities such as building size, building height, building type/construction, and industrial features such as a large electrical substation. The buildings range in height from 32 to just under 45 feet in height which is significantly higher than the surrounding two-story residences. For example, a two-story house is approximately 20-28 feet high and a 3-story apartment building is approximately 30 feet high. These are significant impacts and need to be mitigated by reducing building heights to be compatible with residential community.
- **Impact 3.13-3 (DEIR, Page 3.13-23): Create a New Source of Substantial Light or Glare That Would Adversely Affect Day or Nighttime Views in the Area.** The DEIR states that “Thus, with implementation of the lighting plan and compliance with applicable and existing regulations, the project would have a less-than-significant impact related to light or glare.” However, this statement is not substantiated by any supporting calculations or modeling. The DEIR should calculate the combined impact of all light sources for each acre of the “innovation” portion of the proposed project that includes building lighting; headlights of equipment, passenger vehicles, and semi-trucks traveling on the property; security lighting (e.g., electrical substation); landscape lighting; etc. and compare them with lighting output of a representative one acre-sized area of the adjacent Winding Creek residential community. A second metric that can also be used to determine significance of the proposed project’s lighting impact are the residential standards in the Pattern Outdoor Lighting Code that is provided on Placer County’s website (<https://www.placer.ca.gov/DocumentCenter/View/8151/Shute-Mihaly-and-Weinberger-LLP-for-Sierra-Watch---Exhibit-29-PDF>). Industrial lighting standards are not an appropriate standard for a development located adjacent to residences; therefore, residential standards should be complied with. The Light Code standards include a maximum total outdoor light output standards for Lighting Zone 1 for residential uses of

10,000 lumens per residence for fully and partially shielded and 3,000 lumens for partially shielded (Pattern Outdoor Lighting Code (USA), Standard ver. 2.0 July 2010, Table 4.2). A third metric that can also be used to determine significance of the proposed project's lighting impact is the City of Tucson's maximum total and unshielded outdoor light outputs in lumens/acre for residential zoning with a maximum total outdoor light output for residential E1a/b zoning of 12,000 lumens per acre (https://www.tucsonaz.gov/files/pdsd/codes-ordinances/2012_outdoor_lighting_code_.pdf).

Additional analysis of the lighting impact (intensity and glare) on adjacent residences of truck, vehicle, and equipment headlights traveling on the property should also be included. The DEIR should also analyze and discuss the proposed project's lighting nuisance impacts on nearby residents' quality of life because it also relates to compliance with the General Plan. The DEIR should be revised to state in mitigation measures that the proposed project would comply with residential lighting standards and requirements in the City's Community Design Guidelines, The Nighttime Sky-Title 24 Outdoor Lighting Standards, and a defined maximum total outdoor light output for residential zoning in lumens per acre (e.g., 12,000 total lumens per acre and 0 unshielded lumens per acre) that would be consistent with the Winding Creek community light output.

I ask the City of Roseville revise the proposed project and/or mitigation measures to comply with CEQA to reduce significant and unavoidable impacts (see California Public Resources Code§ 21081; 14 CCR§ 15126.2(b)) as there are feasible project modifications and mitigation measures that have not been proposed.

Thank you for your time and consideration of this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "J. Marks", with a horizontal line underneath.

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