Ogden, Derek

From: [redacted]
Sent: Wednesday, April 29, 2026 6:18 AM
To: Singer, Eric; Ogden, Derek
Subject: Phillip Road Site Public Comment

My name i[redacted]nd I live at 8[redacted]n Roseville. These are my comments regarding the Phillips Road Site Project. Please email me back to confirm you have received this email which I am sending prior to the 4/30 public comment deadline.

The on-site Mitigation Measures suggested in section 3.5-1a are minimal at best. Substantial, on-site GHG reductions measures **must** be included in this EIR to reduce the impact of this project to below the bright line level without the need of off-site mitigations.

There are so many additional on-site GHG reduction measures that could be taken to reduce greenhouse gas emissions that are not mentioned in the report. The availability and affordability of purchasing GHG offset credits in the future is unknown. Therefore, the mitigation measures for this project should be on-site GHG reduction measures to enable the site to meet its mitigation obligations long-term and not be subject to uncertain availability and affordability of GHG offset credits.

Here is a list of tangible and onsite measures that can be taken which meet the 17 C.F.R. Section 95802 requirements that GHG reductions must be "real, additional, quantifiable, permanent, verifiable, and enforceable." These measures come directly from the CalEE Mod Handbook For Analyzing Greenhouse Gas Emissions Reductions.
Additional mitigation measures that should be considered for section 3.5-1a:
E-16: Require Zero Net Energy Buildings
E-11: Procure Electricity from Lower Carbon Intensity Power Supply
E-17: Require Renewable-Surplus Buildings
E-10-A: Establish Onsite Renewable Energy Systems: Generic
E-9: Utilize a Combined Heat and Power System
E-24: Provide Battery Storage
E-25: Install Electic Heat Pumps
E-2: Require Energy Efficient Appliances
E-22: Obtain Third-Party HVAC Commissioning and Verification of Energy Savings
E-5: Install Green Roofs in Place of Dark Roofs
E-3-B: Require Energy Efficient Commercial Pack Boilers
E-1: Building Exceeds 2019 Title 24 Building Envelope Energy Efficiency Standards
E-21: Install Cool Pavements
EH-1: Green infrastructure
EH-10: Covered parking with solar array
EH-3: Heat-reducing roof with solar array
EH-4: LEED certification
EH-8: Alternative pavement surfaces
EH-9: Expand Urban Tree canopy
R-1: Use Alternative Refrigerants instead of High-GWP refrigerants
R-4: Install Microchannel Heat Exchangers in A/C equipment in place of conventional Heat Exchangers
R-6: Reduce Operational Leak Emissions

S-1/S-2: Implement Waste Reduction Plan
T-2: Increase Job Density
T-9 Implement Subsidized or Discounted Transit Program
T-12: Price Workplace Parking
T-13: Implement Employee Parking Cash-Out
T-6: Implement Commute Trip Reduction Program (Mandatory Implementation and Monitoring)
T-38: Provide First and Last Mile TNC Incentives
T-39: Implement Preferential Parking Permit Program
T-53: Electrify 100% of Loading Docks
T-30: Use Cleaner-Fuel Vehicles
MH-18: Climate-resilient design for infrastructure
MH-28: Climate-smart energy
MH-39: Pervious and climate-smart surfaces
M-3: Implement an innovative strategy for GHG Mitigation
M-4: Require Environmentally Responsible Purchasing
M-5: Fund Incentives for Green Technologies
N-1: Create New Vegetated Open Space in addition to the current space around Pleasant Grove Creek
N-2: Expand Urban Tree Planting
IC-4: Enhanced Open and Green Spaces
C-1-A: Use Electric Powered equipment- All electrical landscape equipment and on-site vehicles (ie forklifts)
C-1-B: Use Cleaner-Fuel Equipment
C-6: Use Diesel Particulate Filters (Require off-road diesel equipment to use a CARB-certified diesel particulate filter.)
CE-4: Portable Indoor Air Filtration for Nearby Residents during Construction
CE-5: Air quality monitoring and response plan
LL-1: Replace Gas Powered Landscape Equipment with Zero-Emission Landscaping Equipment
PH-1: Establish Vegetative Barriers to Reduce Pollution Exposure
PH-2: Increase Urban Tree Canopy and Green Spaces
D-3: Drought-resistant landscape
W-2: Use grey water
W-6: Reduce turf in landscape

Many of the calculations run in this report used the CalEEMod. When you use that model, the system automatically suggests every single one of the above suggestions to you. That means that the climate change specialists who prepared this EIR completely and purposely ignored all of these recommendations.

The measures selected by these authors are instead some of the cheapest solutions and do the absolute bare minimum. It throws into question whether or not the climate change specialists are unbiased or are actually attempting to construct an EIR which favors the developer. Qualified GHG professionals other than those who came up with this minuscule list currently in the EIR need to go through the CalEE Mod Handbook For Analyzing Greenhouse Gas Emissions Reductions and add many many more mitigation measures that will actually reduce GHG on-site to below the bright line level without the need of off-site mitigations.