

From: Lorrie J. LeLe <ljllele@adamsbroadwell.com>
Subject: Request for Extension of Public Comment Period for the Draft Environmental Impact Report for the Phillip Road Site Project (6557)
To: Isom, Mike <misom@roseville.ca.us>; Planning External <PlanningDivision@roseville.ca.us>; Singer, Eric <EJSinger@roseville.ca.us>; Ogden, Derek <DOgden@roseville.ca.us>
Cc: Kevin Carmichael <kcarmichael@adamsbroadwell.com>
Sent: March 13, 2026 12:36 AM (UTC+00:00)
Attached: 6557-022j - Phillip Road Site Project DEIR - Extension Request.pdf

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On behalf of Placer County Residents for Responsible Development, attached is our request to extend the public comment period regarding the Draft EIR for the Phillip Road Site project.

Please respond to Kevin Carmichael – kcarmichael@adamsbroadwell.com

Thank you,

Lorrie LeLe

Legal Assistant

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March 12, 2026

Via Email and U.S. Mail

Mike Isom

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Via Email Only

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**Re: Request for Extension of Public Comment Period for the Draft
Environmental Impact Report for the Phillip Road Site Project
(PL24-1010)**

Dear Mr. Isom and Mr. Singer:

We are writing on behalf of Placer County Residents for Responsible Development ("Residents") to request that the City of Roseville ("City") extend the public review and comment period for the Draft Environmental Impact Report ("DEIR") for the Phillip Road Site Project (PL24-1010) ("Project") **by at least 45 days due to the City's failure to provide timely access to the documents referenced and relied upon in the DEIR** in response to Placer County Residents' March 3, 2026 request for immediate access to DEIR reference documents. This extension request is made pursuant to the California Environmental Quality Act, Pub. Resources Code ("PRC") §§ 21000 et seq. ("CEQA") Section 21092(b)(1) and CEQA Guidelines section 15087(c)(5), which requires that

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“all documents referenced in the draft environmental impact report” be available for review and “readily accessible” during the entire comment period.¹

On March 3, 2026, we submitted a letter to the City pursuant to CEQA Section 21092(b)(1) requesting ***“immediate access to any and all documents referenced, incorporated by reference, and relied upon”*** in the DEIR (“DEIR Request”). On Wednesday, March 4, 2026, Mr. Singer responded to the DEIR Request via email to inform Residents that all documents related to the Draft Environmental Impact Report for the subject project may be found on the City's website, and provided a link to the City's website where the DEIR and appendices may be found.

Upon review, our office has determined that the DEIR relies on several reference documents which are either not included in the DEIR or are accompanied by non-functioning weblinks including the following references in the DEIR's Chapter 8:

- California Natural Diversity Database. 2025a. Results of electronic records search of the following US Geological Survey quadrangles: Citrus Heights, Lincoln, Nicolaus, Pleasant Grove, Rio Linda, Roseville, Sheridan, Taylor Monument, and Verona. California Department of Fish and Wildlife, Biogeographic Data Branch. Sacramento, CA. Retrieved October 10, 2025.
- Meyer, Jack, and Jeffrey S. Rosenthal. 2008 (April). A Geoarchaeological Overview and Assessment of Caltrans District 3. Prepared for the California Department of Transportation.
- Abatzoglou, J. T., and A. P. Williams. 2016 (October 18). “Impact of Anthropogenic Climate Change on Wildfire across Western US Forests.” Proceedings of the National Academy of Sciences 113(42): 11770-11775.
- Schoennagel, T., J. K. Balch, H. Brenkert-Smith, P. E. Dennison, B. J. Harvey, M. A. Krawchuck, N. Mietkiewicz, P. Morgan, M. A. Moritz, R. Rasker, M. G. Turner, and C. Whitlock. 2017 (May 2). “Adapt to More Wildfire in Western North American Forests as Climate Changes.” Proceedings of the National Academy of Sciences 114(18): 4582-4590.

¹ PRC §§ 21092(b)(1) (emphasis added); 14 Cal. Code Regs. (“CCR”) § 15087(c)(5).
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- Westerling, A. L., H. G. Hidalgo, D. R. Cayan, and T. W. Swetnam. 2006 (August 18). “Warming and Earlier Spring Increase Western US Forest Wildfire Activity.” *Science* 313(5789): 940-943.
- Roseville Fire Department. 2020 (February). *Final Standards of Cover*. Roseville, CA. Prepared by Fitch & Associates, LLC, Platte City, MO.
- California Air Resources Board. 2025a. CARB Receives Direction on Finalizing Low Carbon Fuel Standard Amendments. Available: <https://ww2.arb.ca.gov/news/carb-receives-direction-finalizing-low-carbon-fuelstandardamendments#:~:text=On%20November%208%2C%202024%2C%20the,of%20zero%2Demission%20infrastructure%20and>. Accessed July 9, 2025 (Weblink Broken)

Additionally, in order to conduct a thorough review of the Project’s air quality and health risk impacts, Residents requires access to the unlocked emissions modeling input files in their native formats including:

- Native format American Meteorological Society/Environmental Protection Agency (AMS/EPA) Regulatory Model (AERMOD) input files used for the Project's construction and operational health risk assessment
- Native format California Emissions Estimator Model (CalEEMOD) input files for construction and operational criteria pollutant and GHG emissions assessment.
- Native format Hotspot Analysis Reporting Program Version 2 (HARP 2) input files used to analyze the Project's cancer and non-cancer health risks associated with DPM emissions from project related heavy-duty truck trips. emissions input files including native format CalEEMOD and AERMOD.

A. CEQA Violations and Request to Extend DEIR Public Comment Period

CEQA requires that “all documents referenced in the draft environmental impact report or negative declaration” be available for review and “readily accessible” during the entire public comment period.² The courts have held that the failure to provide even a few pages of a CEQA document for a portion of the CEQA review period invalidates the entire CEQA process, and that such a failure must be

² PRC § 21092(b)(1); 14 CCR § 15087(c)(5).
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remedied by permitting additional public comment.³ It is also well settled that an EIR may not rely on hidden studies or documents that are not provided to the public.⁴ Residents submitted the DEIR Request on March 3 to obtain access to DEIR reference documents which were not available on the City's website or CEQANet. To date, the City has not provided Residents with copies or links to all of the requested documents, nor provided Residents with information on where or how to obtain access to reference documents that are not available online. By failing to make all documents referenced in the DEIR "readily available" during the current comment period, the City is violating the clear procedural mandates of CEQA, to the detriment of Residents and other members of the public who wish to meaningfully review and comment on the DEIR.

These reference documents are critical to understanding and commenting on the DEIR's analysis of the Project's impacts to several critical resource areas, including, in particular, the DEIR's analysis of the Project's air quality, health risk, transportation, greenhouse gas, and energy impacts.

Without access to these critical DEIR reference documents during the public comment period on the DEIR, Residents and other members of the public are precluded from having the meaningful opportunity to comment on the DEIR required by CEQA. The City's failure to make the underlying DEIR documents available during the entire comment period makes public review particularly burdensome in this case because of the DEIR's reliance on missing documents for significance determinations and mitigation measures to address the Project's environmental impacts. Without having access to these documents, Residents and other members of the public are unable to fully evaluate the accuracy of the DEIR's impact analysis, or the efficacy of the DEIR's proposed mitigation measures. Additionally, the size of the DEIR and the Project's complexity make it difficult to effectively comment on the DEIR without the referenced documents by the current comment deadline of March 23, 2026.

³ *Ultramar v. South Coast Air Quality Man. Dist.* (1993) 17 Cal.App.4th 689, 699.

⁴ *Santiago County Water District v. County of Orange* (1981) 118 Cal.App.3rd 818, 831 ("Whatever is required to be considered in an EIR must be in that formal report; what any official might have known from other writings or oral presentations cannot supply what is lacking in the report."). 6557-022j

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Accordingly, we request that:

- 1) The City immediately provide Residents with access to all reference documents relied upon in the DEIR that are not accompanied by weblinks, including but not limited to the unlocked emissions modeling input files relied upon in the DEIR.
- 2) The City **extend the public review and comment period on the DEIR for at least 45 days from the date on which the City releases these documents for public review.**⁵ If the missing documents are provided today, we request an extension to April 27, 2026.

B. Conclusion

The City has improperly delayed access to DEIR reference documents and public records to which Residents and other members of the public have a right to immediate access. Given the short time before the close of the current DEIR public comment deadline, please contact me as soon as possible with your response to this letter, but **no later than Friday, March 17, 2026.**

Please contact me with any questions regarding the above request by telephone at (916) 444-6201 or via email at kcarmichael@adamsbroadwell.com. Thank you for your prompt attention to this matter.

Sincerely,



Kevin Carmichael

KTC:ljl

⁵ This Project has a 45-day public comment period, pursuant to 14 CCR § 15105 (projects submitted to the State Clearinghouse).
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