Outlook

RE: Public Comment – Sierra View Shopping Center (PL25 0496)

From Six, Katrina <KMSix@roseville.ca.us>
Date Wed 10/21/2026 4:07 PM
To Stephanie Brown <444auntiesef@gmail.com>; City Clerk <CityClerk@roseville.ca.gov>
Cc Singer, Eric <EJSinger@roseville.ca.us>; planningdept@roseville.ca.gov <planningdept@roseville.ca.gov>; council@roseville.ca.gov <council@roseville.ca.gov>

Good Afternoon Stephanie!

Thank you for your comment. This will confirm it has been received.

Katrina Six, CMC
City Clerk Technician
City Clerk Department

(916) 774-5267
Civic Center | 311 Vernon Street | Roseville, CA 95678

CONFIDENTIALITY NOTICE: This email message and any accompanying documents are for the sole use of the intended recipient(s) and may contain confidential and/or privileged attorney-client information or work product. DO NOT FORWARD. Any unauthorized review, use, disclosure or distribution is prohibited. If you are not the intended recipient, please contact the sender by reply email and destroy all copies of the original message. Thank you.

From: Stephanie Brown <444auntiesef@gmail.com>
Sent: Wednesday, October 21, 2026 4:01 PM
To: City Clerk <CityClerk@roseville.ca.gov>
Cc: Singer, Eric <EJSinger@roseville.ca.us>; planningdept@roseville.ca.gov; council@roseville.ca.gov
Subject: Public Comment – Sierra View Shopping Center (PL25 0496)

External: This email was sent by a person from outside your organization. Exercise caution when clicking links, opening attachments, or taking further action.

This is the first time you received an email from this sender (444auntiesef@gmail.com). Exercise caution when clicking links, opening attachments, or taking further action.

Dear Mayor and Councilmembers,

I live near the proposed Sierra View project and am a member of Protect Our Roseville Neighborhoods. I request that the Council deny or delay approval of PL25 0496 because the environmental and health-risk analysis in the record is incomplete.

The Health Risk Assessment modeled the nearest sensitive receptor as a home 500 feet away, even though the Sierra Vista Apartments — which are documented as close as 134 to 267 feet from the project's loading dock, trash compactor, and grocery building — are substantially closer and represent a much larger population. These receptors were not modeled, leaving a significant gap in the analysis.

Additionally, the HRA did not include a cumulative toxic air contaminant analysis accounting for emissions from the Safeway fuel station across the intersection. Sierra View proposes a second fuel station within a few hundred feet of the same homes and apartments, and both stations will operate concurrently. Without cumulative modeling, the City cannot determine whether combined emissions exceed health-risk thresholds.

The project also includes three drive-through restaurants, a loading dock, and a trash compactor — all of which generate idling emissions, diesel particulate, and nighttime activity directly adjacent to homes. These impacts were not fully evaluated.

I respectfully request that the Council deny or continue the project until these environmental and health-risk issues are fully addressed. Thank you.

Stephanie Brown
Roseville, CA

m | r | wolfe
& associates, p.c.
attorneys-at-law

October 20, 2026

By Email

Krista Bernasconi, Mayor
Members of the City Council
City of Roseville
c/o City Clerk
311 Vernon Street
Roseville, CA 95678
CityClerkRoseville@roseville.ca.us

Re: Appeal of Planning Commission Approval of Sierra View Shopping Center (File # PL25-0496)

Dear Mayor Bernasconi and Councilmembers:

This firm represents Protect Roseville Neighborhoods ("PRN"), the appellant in the referenced appeal of the Planning Commission's August 12, 2026 approval of the Sierra View Shopping Center ("Project"). This letter supplements PRN's letter to the Council dated October 19, 2026 (the "PRN Letter"), and further addresses the legal arguments on which the applicant and staff rely to defend the City's reliance on an Addendum to the Sierra Village Specific Plan ("SVSP") EIR as the means of CEQA compliance. For the reasons that follow, we urge the City Council to uphold PRN's appeal, reverse the Planning Commission's approval action, and direct staff to require preparation and circulation of a subsequent or supplemental EIR before the Project is given further consideration.

I. Summary

The staff's Response Memorandum, based substantially on an August 12, 2026 letter from Remy Moose Manley ("RMM"), the applicant's counsel, rests on one proposition. The project has about 58,000 square feet of buildings, the SVSP concept plan for the parcel shows up to 250,000 square feet, and therefore the project cannot cause new or more severe effects and nothing built nearby since 2010 constitutes a

changed circumstance. (RMM Letter at 5-7.) The Addendum adopts the same premise. The problems with that position, developed below, are numerous.

1. The Addendum recognizes that some impacts depend on the "size and use of buildings," yet it compares only floor area. Neither the Addendum nor the RMM Letter compares the project's trips, noise, or toxic air emissions, by use, to anything the SVSP EIR assumed for this parcel.

2. The 3,000-square-foot coffee drive-through sits on a parcel outside the SVSP and relies on a 2021 mitigated negative declaration for a 910-square-foot kiosk. For that portion the fair argument standard applies.

3. This is the eighth Addendum to the SVSP EIR, yet the current record describes only two earlier changes to the site.

4. The RMM letter incorrectly attributes to Addendum page 4 a "North Roseville Specific Plan" approved in 1997. That page describes the West Roseville Specific Plan, approved in 2004. The letter also cites Addendum pages 5 and 8 for cumulative analysis those pages do not contain.

5. The RMM letter's transportation/VMT discussion misstates the law. SB 743 removed automobile delay as a CEQA impact. It left geometric design hazards in place, and the Addendum itself evaluates them.

6. The noise and air quality arguments substitute argument for analysis. RMM quotes a finding of imperceptibility made about different receptors, relies on an "existing receptor" premise the City's consultants do not apply elsewhere, omits the City's 2021 nighttime noise finding for this parcel, and answers the missing apartment results with counsel's reading of a site plan.

7. Two attachments on which the Addendum relies appear to be missing from the Council's record: the SVSP mitigation measures (Attachment 1) and the Saxelby Noise Study (Attachment 3). These documents apparently have been omitted from the Council's staff report. The SVSP EIR left commercial noise to project-level analysis, so the Noise Study is the only analysis of this project's commercial noise, and the conditions of approval incorporate the mitigation measures by reference without listing them. The Council should

not, and lawfully may not, act until both are provided and the public has had time to review them.

II. Standard of Review

PRN concurs that the decision not to prepare subsequent EIR, and to rely instead on an Addendum, "must be supported by substantial evidence." (CEQA Guidelines, § 15164, subd. (e).) Under CEQA, substantial evidence is defined as facts, reasonable assumptions predicated on facts, and expert opinion supported by facts. Argument, speculation, and unsubstantiated opinion do not qualify. (Pub. Resources Code, § 21082.2, subd. (c); CEQA Guidelines, § 15384.) The RMM Letter is advocacy by the applicant's counsel. The staff Response Memorandum, which states a conclusion without the underlying data, belongs in the same category. For each conclusion on which the Addendum relies, the Council should ask where in the record the supporting facts appear.

The RMM letter quotes the statement that after environmental review "the statutory presumption flips in favor of the developer and against further review," and explains that the deference "is a reflection of the fact that in-depth review has already occurred." (RMM Letter at 5, quoting *Citizens Against Airport Pollution v. City of San Jose* (2014) 227 Cal.App.4th 788, 797-798.) That premise has to be shown. The Addendum's "Where Impact Was Analyzed" column cites chapter numbers of the SVSP EIR and no page. (Addendum at 13-48.) The Addendum identifies no page of the SVSP EIR that analyzed a 24-hour fuel station, three drive-through restaurants, a grocery loading dock, and a trash compactor sited roughly 110 to 270 feet from multifamily housing.

Section 15162 of the CEQA Guidelines asks whether substantial changes in the project or its circumstances "will require major revisions of the previous EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects." (CEQA Guidelines, § 15162, subd. (a)(1)-(2); *Friends of College of San Mateo Gardens* (2016) 1 Cal.5th 937, 950.) The RMM Letter states the test in those terms. (RMM Letter at 2.) It then answers a different question: whether the project's floor area is smaller than the floor area on a 2010 concept plan. Section III below explains why that substitution fails.

III. Floor Area Is Not the Measure of Environmental Effect

A. The only comparison in the record is a floor-area ratio.

The Addendum states that the SVSP EIR "anticipated up to 250,000 square feet of commercial development" on parcel JM-41, a floor area ratio of about 0.40, and that the project's 58,210 square feet yields a ratio of 0.09, about one quarter of the analyzed intensity. (Addendum at 8-9.) The RMM Letter repeats the comparison. (RMM Letter at 7.) The 250,000-square-foot figure comes from Figure B-31 of the SVSP, which staff calls "an initial concept design." Neither document cites a page of the SVSP EIR stating the land uses, trip rates, noise sources, or emission sources it assumed for that 250,000 square feet.

B. The Addendum concedes that use matters and then compares only size.

The Addendum states that impacts to physical resources depend on grading, "not on the arrangement or use of buildings within the site," and that "other types of impacts that are affected by size and use of buildings, such as air quality," received "minor technical updates." (Addendum at 9.) Trip generation, operational noise, and toxic air contaminants are impacts of that second kind. The Zoning Ordinance requires a conditional use permit for drive-throughs and fueling stations that adjoin residentially zoned property. This project puts a 24-hour fuel station and three drive-through restaurants in one center with a grocery store, next to a 192-unit apartment project.

On trips, the only quantitative comparison in the Addendum is to the City's 2035 traffic model. The model assumes a retail-equivalent of 80,000 square feet on the site, and the Addendum states that "the number of pumps is not a model input." (Addendum at 25.) That comparison does not use the SVSP EIR's assumptions, and it leaves out the fuel station's trip generation. According to Table 1 of the Fehr & Peers Access Study, as cited in the PRN Letter, the drive-throughs and fuel station occupy about 25 percent of the project's floor area and generate about 59 percent of its gross weekday PM peak-hour trips (485 of 828). The record contains no comparison of the project's trips, by use, to the SVSP EIR's assumptions for this parcel. Without that comparison, the Council cannot find that the project's trips fall within the EIR's scope of analysis.

RMM cites *IBC Business Owners for Sensible Development v. City of Irvine* (2023) 88 Cal.App.5th 100, 119, for the proposition that addenda suit minor technical changes. (RMM Letter at 3.) In that case the Court of Appeal affirmed a judgment setting aside an addendum to a 2010 program EIR, together with the project approvals, because the City's conclusion that the project's greenhouse gas emissions would be less than significant lacked substantial evidence. (*Id.* at pp. 125-126.) The court also rejected the City's fallback reliance on the Class 32 infill exemption. (*Id.* at pp. 131-132.) The court held that to show the project complied with the program EIR's emissions framework, the City needed to analyze the project's emissions in the context of present and future development in the plan area. (*Id.* at p. 129.)

The same gap appears here. The Addendum asserts consistency with the SVSP EIR without analyzing the project's effects, by use, against the setting that now exists.

C. Impacts from the drive-through have not been adequately analyzed.

Building 1 is a 3,000-square-foot coffee drive-through on West Roseville Specific Plan ("WRSP") parcel W-20, which lies outside the SVSP. (Packet pp. 842, 860; Addendum at 3-4, Packet pp. 922-923.) Staff states that no further analysis is needed for that portion because a 2021 mitigated negative declaration "adequately describes" the impacts of "developing this area with a drive-thru coffee building." (Packet pp. 845-846.) RMM calls it "conservative" to count Building 1 in the project total because it was "separately evaluated." (RMM Letter at 7.) Four points rebut that position.

First, the 2021 mitigated negative declaration ("MND") evaluated a 910-square-foot kiosk. (Addendum at 4.) According to the Planning Commission Staff Report, Building 1 is 3,000 square-feet - more than three times that size.

Second, parcel W-20 carried a Low Density Residential designation in the WRSP until the 2021 rezone. Land in another specific plan area, designated residential until 2021, is difficult to place inside an EIR figure stated for parcel JM-41. Including Building 1 in the "one quarter of the intensity" comparison tests the project against an envelope that may not have covered its land.

Third, the 2021 MND, relying on an acoustical analysis by Bollard Acoustical Consultants, found that drive-through operations on W-20 would exceed nighttime

hourly average noise standards at the adjacent residential property line if operating hours extended past 10:00 p.m. It required either a 10-foot solid noise barrier or a limit on drive-through hours of 7:00 a.m. to 10:00 pm, as the PRN letter explains. Neither measure appears in the conditions of approval.

Fourth, the governing standard differs. RMM cites *San Mateo Gardens II*. (RMM Letter at 5.) On remand the Court of Appeal held that when the earlier document is a negative declaration, the question whether project changes require major revisions is tested by the fair argument standard, and it set aside the district's addendum. (*Friends of College of San Mateo Gardens v. San Mateo County Community College Dist.* (2017) 11 Cal.App.5th 596, ; see *San Mateo Gardens I*, 1 Cal.5th at p. 957, 959 [subsequent review required where substantial evidence shows changes "might have a significant environmental impact not previously considered"].) For Building 1 the earlier document is the 2021 MND. The 2021 nighttime noise finding, the growth of the building from 910 to 3,000 square feet, and the change from a stand-alone driveway to shared center access (PRN Letter § IV.B) are facts that support a fair argument that the changes may have significant effects not previously considered.

D. This is the eighth addendum to the SVSP EIR, yet it only discloses two prior actions involving the site.

The Addendum is the "8th Addendum" to the SVSP EIR. (Packet p. 920.) It describes two earlier actions affecting this site, the 2021 coffee kiosk approval and the 2022 reconfiguration of parcels JM-30, JM-41, and W-20 into a single commercial site, and both were adopted on mitigated negative declarations. (Addendum at 4-5.) It does not identify the seven earlier addenda or say what each changed. Section 15162 measures substantial changes against the project the certified EIR analyzed, and the decision-maker considers the addendum together with the final EIR. (CEQA Guidelines, §§ 15162, subd. (a), 15164, subd. (d).) Changes that are individually modest can together require major revisions. Without the earlier addenda, the Council cannot judge whether the project as it now stands departs substantially from the project the SVSP EIR analyzed. PRN requests that all seven be added to the record and posted before the Council acts.

IV. Changed Circumstances and Cumulative Impacts

A. The RMM Letter misdescribes the Addendum.

The RMM Letter says that "the City approved the North Roseville Specific

Plan ("NRSP") and related EIR in 1997, which analyzed impacts associated with forecasted development of residential, commercial, open space, parks, and public facility uses on 3,162 neighboring acres," and it cites Addendum page 4. (RMM Letter at 6.) The cited page 4 does not mention a North Roseville Specific Plan or the year 1997. It describes the West Roseville Specific Plan, "approved in 2004," which "includes 3,162 acres." (Addendum at 4.)

The RMM Letter then says that the Grocery Outlet store is among the "anticipated uses" of that plan and was "deemed categorically exempt from CEQA" in 2023. (RMM Letter at 6.) Two consequences follow. First, RMM attributes the neighboring development to a plan other than the SVSP. That contradicts the statement by staff, and the premise of the Addendum, that these projects "implement the adopted SVSP." Second, an exemption determination analyzes nothing. It cannot supply the cumulative analysis the Addendum lacks.

B. The pages RMM cites contain no cumulative analysis.

RMM says the cumulative effects of the project together with nearby development, "including the Safeway fuel station and Sierra Vista Apartments, were previously contemplated and analyzed in the SVSP EIR," and cites Addendum pages 5 and 8 for the point. (RMM Letter at 6-7, Packet pp. 912-913.) Addendum page 5 contains the 2022 parcel history and a table of surrounding uses that lists a CVS pharmacy to the east. Addendum Page 8 recites the SVSP EIR's significant and unavoidable impacts and begins the floor-area comparison. Neither page mentions the West Roseville Marketplace, its Safeway, its fuel facility, or Grocery Outlet. PRN has found no reference to any of them in the Addendum. RMM's remaining support is a citation to a 168-page section of the SVSP EIR (pages 5-9 to 5-176) and a single page, 5-138, for cumulative toxic air contaminants. (RMM Letter at 6-7, 11.) The SVSP EIR is not in the Council's packet.

C. Cumulative impact analysis must be based on the same evidence assumed in the SVSP EIR.

PRN agrees with the principle RMM invokes: development that a certified EIR assumed in its cumulative analysis is not a changed circumstance. The principle depends on the showing, and the showing is missing. The SVSP EIR's traffic noise analysis used "the year 2025 plus project," a horizon that has now passed. (Addendum at 35.) The West Roseville Marketplace was approved on a 2022 MND

(SCH #2022090665) and Grocery Outlet on a 2023 exemption, and no document in the record analyzes those projects together with this one.

The Council should require the Addendum's authors to identify, with pinpoint citations to the SVSP EIR, the land use, intensity, trip, and fuel-dispensing assumptions the SVSP EIR used for the parcels at the other corners of the intersection. The authors should also explain why two fuel stations with 24 dispensing pumps, three grocery stores, and at least five drive-through restaurants at one intersection fall within those assumptions. (CEQA Guidelines, §§ 15130, subd. (b), 15162, subd. (a)(2), 15164, subd. (e).) The statement that the projects "implement the adopted SVSP" does not answer that request as to parcels east of Fiddyment Road, which the staff report places outside the SVSP.

V. The Transportation/VMT Argument Misstates the Law

The RMM Letter argues that "[a]ccess, traffic, and circulation impacts and related improvements . . . are not cognizable impacts under CEQA," citing Guidelines section 15064.3. (RMM Letter at 8.) The statement is overbroad, and the history RMM recites is wrong. Public Resources Code section 21099, subdivision (b)(2), provides that "automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion" is not a significant impact on the environment." Its text addresses delay and congestion. Hazards from a project's geometric design fall outside it. The CEQA checklist the City itself used asks whether a project would "[s]ubstantially increase hazards due to a geometric design feature(s)" and whether it would "[r]esult in inadequate emergency access." The Addendum answers "No" to both and relies on the Access Study and City review for those answers. (Addendum at 40-42.) The City therefore treats those questions as live CEQA questions. RMM's "not cognizable" argument cannot be squared with the Addendum it defends.

PRN's remaining transportation points are these: Driveway 4 is 10 feet short of the City's 400-foot spacing standard at an intersection where the City's own consultant found left-turn queues already exceeding storage; no drive-through stacking analysis exists; and the status of the Access Study's fuel-station recommendation is unclear. (PRN Letter §§ VI.B-VI.D.) None concerns level of service. The RMM Letter addresses none of them. Staff's answer on stacking, that "[a]ll three drive-through's meet the City's design standard for queue lengths," does

not identify the standard or the stacking length provided. The Access Study itself states that no analysis was possible because no tenants are known. (PRN Letter § VI.C.)

VI. Noise Impacts

The RMM Letter says the project's noise increases are "small enough that they are likely to be imperceptible to the human ear." (RMM Letter at 9, Packet p. 915, citing Addendum at 35.) In the Addendum that sentence describes the receptors for which an ambient-increase analysis was done. The largest increase is 0.7 dBA, from 49.3 to 50 dBA, at R7 and R8, single-family homes south of the site. (Addendum at 35.) The Sierra Vista Apartments, receptors R9 and R10, are not among them. Quoting the finding as though it covered the apartments misreads the Addendum.

The Noise Study includes R9 and R10 among its ten modeled receptors and reports compliance with the absolute daytime and nighttime standards at them. (Noise Study, Table 11, as cited in PRN's Planning Commission letter, Packet p. 884 [VERIFY against the Noise Study].) The HRA lists "the Sierra Vista Apartments under construction west of the site" among the "sensitive receptors." (HRA at 5.) Only the ambient-increase tables exclude the apartments, on the ground that they are "approved but not constructed." The City cannot treat 192 approved households as present for one noise threshold and absent for the other.

A. CEQA does not require the baseline RMM describes.

RMM cites Guidelines section 15125 and *South of Market Community Action Network v. City and County of San Francisco* (2019) 33 Cal.App.5th 321, 337-338, for the use of existing physical conditions as the baseline. (RMM Letter at 9.) Guidelines section 15125, subdivision (a)(1), also allows a baseline that reflects "conditions expected when the project becomes operational," where substantial evidence supports it, and the Supreme Court has confirmed that discretion. (*Neighbors for Smart Rail v. Exposition Metro Line Construction Authority* (2013) 57 Cal.4th 439, 452-453.) The apartments were approved on November 19, 2025 and are under construction, according to the staff report. The Addendum cites no evidence that they will remain unoccupied when the center opens. An existing-conditions baseline that excludes them would let the order of approvals decide whether those residents' noise exposure is analyzed at all.

B. Staff's conclusions are not substantial evidence.

Staff states that, given Figure 3, Tables 2 and 11, and the 6-foot masonry wall, "the evidence does not support a conclusion" that R9 and R10 would experience an increase above 3 dB, and that the largest predicted increase at existing receptors, "which are all close by," is less than 1 dB. (Packet p. 903.) No ambient levels, predicted project levels, or increase calculation for R9 and R10 appear in the packet. The apartments are the nearest residential receptors: 110 feet from Building 1's drive-through and 134 feet from the grocery building at their closest, against 150 feet or more for the existing homes. (Packet pp. 854, 1032.) Noise from a fixed source diminishes with distance, so a small increase at more distant homes does not establish the increase at nearer ones. A conclusion without data is the kind of unsubstantiated opinion that section 15384 excludes.

C. The City's 2021 MND finding on this parcel.

The RMM Letter does not mention the 2021 MND's noise finding for parcel W-20. The Addendum says the 2021 noise measure remains applicable through SVSP mitigation measure MM 4.6-2. (Addendum at 4-5.) The text of MM 4.6-2 is in Addendum Attachment 1, which is not in the Council's packet. The Addendum states that the commercial noise controls, which it labels "MM 4.6-1," will be implemented with construction of a six-foot masonry wall on the western property line of Parcel JM-41. (Addendum at 36.) The project proposes a six-foot wall where the 2021 measure specified a 10-foot barrier, and the conditions of approval limit delivery-truck operations but leave drive-through hours unrestricted. The record thus contains a 2021 acoustical analysis finding a nighttime exceedance from drive-through operations on this parcel and a 2026 study finding compliance, with no reconciliation of the two, and only the 2021 analysis is in the packet.

VII. Air Quality

A. The HRA reports no result for receptors living in the nearby apartments.

The HRA identifies the apartments as sensitive receptors (HRA at 5) and then reports a single maximally exposed receptor, a residence about 500 feet north of the fuel station, with a cancer risk of 1.12 in one million. (HRA at 6-7, Table 3.) It reports no result for the apartments. RMM answers that the apartments "will be considerably separated from the fueling station at Building 5 by virtue of several intervening

buildings," citing the HRA's site plan. (RMM Letter at 10-11.) That is counsel's description of a figure. Whether intervening buildings reduce exposure is a dispersion modeling question, and the HRA does not report that it modeled the buildings or the apartments as receptors. Under Public Resources Code section 21082.2, subdivision (c), counsel's reading of a figure is argument.

RMM adds that PRN "presents no substantial evidence of a new or substantially more severe impact." (RMM Letter at 10-11.) The Council must have substantial evidence for the explanation that section 15164, subdivision (e) requires. PRN identified a gap in the City's own study, and a gap in the study is not filled by faulting the commenter for failing to fill it.

B. The cumulative analysis RMM cites is a single page from 2010.

RMM relies on page 5-138 of the SVSP EIR for the proposition that cumulative toxic air contaminant impacts were analyzed. (RMM Letter at 10-11.) That is a 2010 plan-level conclusion. The record does not show that it considered two fuel stations with 24 dispensing pumps at one intersection. According to the City's 2022 MND for the West Roseville Marketplace (SCH #2022090665), as cited in the PRN Council Letter, the Marketplace facility has eight dispensers (16 pumps), twice the eight pumps recited in this project's record. (PRN Letter § VII.B.) The HRA does not mention it. Staff notes that the Air District will review a health risk assessment when it issues its permit. (Packet p. 904.) That review follows the Council's action and does not supply the analysis the Council needs to make its findings now. (See *Sundstrom v. County of Mendocino* (1988) 202 Cal.App.3d 296, 306-307.)

C. The HRA's gasoline throughput assumption is undisclosed.

The HRA's model inputs, in its appendix, assume fuel throughput of 2,040,000 gallons per year. (HRA, Appendix, HARP input sheet.) The HRA text does not state that assumption or its basis, and no condition of approval caps throughput. The California Air Resources Board guidance the HRA quotes treats a facility with throughput of 3.6 million gallons per year or more as "large" and recommends further study within 300 feet of such a facility. For a typical facility the recommended distance is 50 feet. (HRA at 5.) The Council should ask for the basis of the 2,040,000-gallon figure. If the 24-hour facility could sell more, the HRA should be rerun at the higher figure, or a condition should limit throughput to the figure analyzed.

VIII. The "No Evidence," Mitigation, and "Mandatory Addendum" Arguments

A. PRN's showing rests on the City's own records.

RMM states that "neither PRN nor others have identified any evidence to the contrary" for the point that public controversy does not require an EIR. (RMM Letter at 1, 3-4.) It invokes *Bowman v. City of Petaluma* (1986) 185 Cal.App.3d 1065, and Public Resources Code section 21082.2, subdivision (b). However, PRN's showing rests on facts in the City's record: the 390-foot Driveway 4 spacing and the absence of drive-through queue analysis in the Access Study, the Access Study's trip table, the City's 2021 noise finding for parcel W-20, the HRA's silence on the apartments, the City's 2022 traffic analysis of the Fiddyment Road and Pleasant Grove Boulevard intersection, and the Marketplace MND's description of a 16-pump facility. (PRN Letter §§ V-VIII.) Facts, and expert opinion supported by facts, are substantial evidence. (Pub. Resources Code, § 21082.2, subd. (c).)

B. Mitigation does not rescue the Addendum.

RMM argues that an addendum remains available where mitigation reduces an impact below significance. (RMM Letter at 3, citing *River Valley Preservation Project* (1995) 37 Cal.App.4th 154, 168, and *CAAP*, 227 Cal.App.4th at 809-811.) The argument has no application unless the City adopts the mitigation. The Addendum concludes that operational noise requires no new mitigation (Addendum at 35), and the conditions of approval contain neither of the 2021 noise measures nor any drive-through queue measure. (Packet pp. 864-870.) Mitigation relied on to support a conclusion of no new significant impact must be fully enforceable through permit conditions or other binding measures. (Pub. Resources Code, § 21081.6, subd. (b).)

C. The "mandatory addendum" argument assumes its own premise.

RMM contends that Guidelines section 15164 makes an addendum mandatory. (RMM Letter at 5.) It does so only when none of the section 15162 conditions has occurred and the lead agency's explanation is supported by substantial evidence. (CEQA Guidelines, § 15164, subds. (a), (e).) For the reasons above, the record does not support that predicate.

IX. The Council Record Omits the Applicable Mitigation Measures and the Noise Study

PRN objects to any Council action on the Addendum while two of its four attachments are missing from the record before the Council: Attachment 1, the SVSP applicable mitigation measures, and Attachment 3, the Saxelby Acoustics Environmental Noise Assessment dated June 2026 (the "Noise Study"). The Addendum lists its four attachments on its last page. (Addendum at 50, Packet p. 969.) In the Council's packet the Addendum ends at that page, and the next document is Exhibit B, the project plans. The Access Study and the HRA, the other two attachments, are posted on the City's Projects of Interest page. PRN could not locate the Noise Study there. (PRN Council Letter § III.) PRN raises this objection now, before the close of the hearing, to preserve it. (Pub. Resources Code, § 21177, subds. (a), (b).)

A. The Noise Study is the only analysis of commercial noise for this project.

The SVSP EIR did not estimate noise from the commercial uses on this parcel. It states that "[n]o specific site designs are proposed for commercial uses at this time; therefore, noise levels cannot be estimated with any specificity and the effectiveness of specific mitigation cannot be determined at this time." (SVSP EIR at 4.6-29.) It left the question to project-level acoustic analysis under mitigation measure MM 4.6-2. (*Ibid.*) Its examples of commercial noise sources are loading docks, truck circulation, rooftop heating and ventilation equipment, and trash pickup. (*Ibid.*) A text search of the EIR's noise chapter finds no reference to a drive-through, a speaker box, or a fueling station.

The Addendum claims to fill that gap with the (missing) Noise Study. It states that the Study "analyzed potential noise from the proposed uses," and it takes from the Study the results for the daytime and nighttime standards, the ambient increases at the receptors, and the conclusion that no mitigation is required. (Addendum at 35.) The Addendum describes itself as relying on "site-specific studies prepared to address in detail the effects or impacts associated with the project." (Addendum at 7, Packet p. 926.) Staff's response to PRN cites the Study's page 5, Figure 3, and Tables 2 and 11. (Council Packet p. 903.) Excerpts of the Study appear in the Council's packet only because PRN's August 13 letter and staff's response quote them. (Council Packet pp. 884, 903.) Because the SVSP EIR left commercial noise unanalyzed, the Noise Study

is the only analytic support for the Addendum's noise conclusion, and the Council has not been given it.

The omission prevents the Council from checking the points on which PRN and staff disagree: the receptor results for R9 and R10, the ambient-increase calculation that staff says shows no increase above 3 dB, and the operating assumptions the Study used, including delivery hours and the six-foot wall. Staff's summary of a study is a conclusion. A conclusion without the data behind it is the unsubstantiated opinion that section 15384 excludes.

B. The conditions of approval incorporate mitigation measures the Council has not been shown.

The conditions of approval require compliance with "all required environmental mitigation identified in the [SVSP EIR] and Addenda" and do not list a single measure. The Addendum points to Attachment 1 as the table of applicable measures. (Addendum at 14.) Without it the Council cannot tell which obligations it would be imposing. The Addendum is itself inconsistent about them. It cites SVSP measures topic by topic across the checklist, and it declares six biological measures "effectuated" and "no longer applicable" without citing documentation. (Addendum at 14-48; *id.* at 19.) Its noise discussion describes the commercial noise controls as "MM 4.6-1," which is the construction noise measure. (Addendum at 36.)

The text of MM 4.6-2 is in the SVSP EIR. The EIR is not in the packet, though the Addendum says it is available on the City's website. (Addendum at 8.) The measure applies to commercial uses within 150 feet of residences. It calls for masonry walls of 6 to 8 feet, 30-foot setbacks for loading docks and truck routes, shielding of mechanical equipment, and an acoustical evaluation where loading docks or truck routes are less than 100 feet from residential property lines. (SVSP EIR at 4.6-54 to 4.6-55.) Its text does not mention drive-through lanes or speakers, fueling, or hours for drive-through service. The EIR's statement that the measure requires "restriction of delivery hours" (*id.* at 4.6-29) has no counterpart in the measure's text. The 2021 MND for parcel W-20 required a 10-foot barrier or a 7:00 a.m. to 10:00 p.m. limit on drive-through hours to address the nighttime exceedance it found. The Addendum describes MM 4.6-2 as "equivalent" to the 2021 measure. (Addendum at 4-5.) Whether it is equivalent can be tested only with the text of both measures and the Noise Study in front of the Council.

C. The omissions defeat informed decision-making and the substantial evidence finding.

The Council must consider the addendum together with the final EIR before it decides. (CEQA Guidelines, § 15164, subd. (d).) By its own terms the Addendum relies on the site-specific studies listed as its attachments. A body that has not been given those studies has not considered the Addendum on which it is asked to act. The City's decision not to prepare a subsequent EIR must rest on an explanation supported by substantial evidence (*id.*, subd. (e)). Substantial evidence consists of facts and expert opinion supported by facts. (CEQA Guidelines, § 15384; Pub. Resources Code, § 21082.2, subd. (c).) A summary of a report the decisionmaker has not read does not qualify.

An EIR must contain enough detail for those who did not prepare it to understand and consider meaningfully the issues the project raises. (See *Vineyard Area Citizens for Responsible Growth, Inc. v. City of Rancho Cordova* (2007) 40 Cal.4th 412, 442 Guidelines section 15150, subdivision (b), of the Guidelines requires that documents an EIR or negative declaration incorporates by reference be made available to the public for inspection. The Addendum incorporates the SVSP EIR and its four attachments by reference, and the same principle applies to the document on which the Council is asked to rely.

Conditions that incorporate unlisted measures by reference also create an enforceability problem. Measures that avoid or reduce significant effects must be fully enforceable through permit conditions, agreements, or other measures. (Pub. Resources Code, § 21081.6, subd. (b); CEQA Guidelines, § 15126.4, subd. (a)(2).) A condition that requires compliance with "all required" measures from a list the Council has not seen leaves the applicant, staff, and neighbors to dispute later which measures are required.

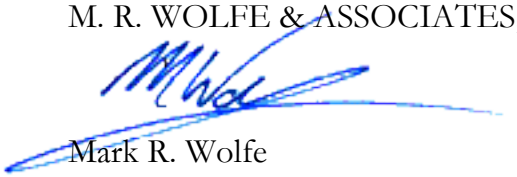
X. Conclusion

For the foregoing reasons, PRN respectfully asks the Council to UPHOLD its appeal, reverse the Planning Commission's approval actions, and direct staff to prepare and circulate a subsequent or supplemental EIR before taking any further action on the Project.

Thank you for your consideration of these concerns.

Most sincerely,

M. R. WOLFE & ASSOCIATES, P.C



Mark R. Wolfe
On behalf of Protect Roseville Neighborhoods

MRW:

Outlook

FW: Letter to City Council re Sierra View Shopping Center Appeal (Item IX.30, 10/21/26 Council meeting agenda)

From Six, Katrina <KMSix@roseville.ca.us>
Date Tue 10/20/2026 11:01 AM
To Casey, Dominick <DCasey@roseville.ca.us>; Sheidenberger, Michelle <MSheidenberger@roseville.ca.us>; Singer, Eric <EJSinger@roseville.ca.us>; Isom, Mike <misom@roseville.ca.us>; Bitter, Greg <GBitter@roseville.ca.us>; Hocker, Lauren <LHocker@roseville.ca.us>
Cc City Clerk <CityClerk@roseville.ca.gov>

1 attachment (272 KB)
Letter_to_City_Council_Re Sierra View Appeal_10-20-2026.pdf;

Good Morning Council & Staff,

Please see the attached letter.

Katrina Six, CMC
City Clerk Technician
City Clerk Department

(916) 774-5267
Civic Center | 311 Vernon Street | Roseville, CA 95678

CONFIDENTIALITY NOTICE: This email message and any accompanying documents are for the sole use of the intended recipient(s) and may contain confidential and/or privileged attorney-client information or work product. DO NOT FORWARD. Any unauthorized review, use, disclosure or distribution is prohibited. If you are not the intended recipient, please contact the sender by reply email and destroy all copies of the original message. Thank you.

From: M. R. Wolfe & Associates, P.C. <admin@mrwolfeassociates.com>
Sent: Tuesday, October 20, 2026 10:56 AM
To: City Clerk <CityClerk@roseville.ca.gov>
Cc: City Clerk <CityClerk@roseville.ca.gov>
Subject: Letter to City Council re Sierra View Shopping Center Appeal (Item IX.30, 10/21/26 Council meeting agenda)

External: This email was sent by a person from outside your organization. Exercise caution when clicking links, opening attachments, or taking further action.

Dear City Clerk:

Attached is correspondence addressed to the City Council concerning the appeal of the Planning Commission's approval of the Sierra View Shopping Center. The appeal is currently scheduled for a pubic hearing at the forthcoming October 21, 2026 Council meeting as Agenda Item no. IX.30.

Please distribute to Councilmembers in advance of the hearing, and include in the administrative record for the matter.

We would be grateful if you could acknowledge receipt of this email and attachment at your convenience.

Thank you very much.

Sharon Kim, Administrator
M. R. Wolfe & Associates, P.C | Attorneys
Land Use | Environmental Law | Government

580 California Street | Suite 1200 | San Francisco, CA 94104
415.369.9400 | Fax: 415.369.9405 |
https://protect.checkpoint.com/v2/r01/___www.mrwolfeassociates.com___.YzJ1OmNpdHlvZnJvc2V2aWxsZWNhOmM6bzo5YTRmNDcyMmVlNTI2MzU5M2U2MmViNGYzZTgzYzQ4ZDo3OjdmNzY6MGMzZGFlMzAzZGNlMWY1ZDk3ZGEwZjU5NmVhZGI5OGRiNmI4ZjNhMjBjYWFhZWE0ZDkwZjU4ZGM4MTZmMTM1Mjp0OkY6Rg

The information in this e-mail may contain information that is confidential and/or subject to the attorney-client privilege. If you have received it in error, please delete and contact the sender immediately. Thank you.

PROTECT ROSEVILLE NEIGHBORHOODS

ProtectRosevilleNeighborhoods@gmail.com | Roseville, California

October 19, 2026

Via email to cityclerk@roseville.ca.gov

Mayor and Members of the City Council
City of Roseville
311 Vernon Street
Roseville, CA 95678

Cc: City Clerk; Development Services Director; City Attorney

Re: Agenda Item IX.30 (October 21, 2026): Sierra View Shopping Center Appeal, File #PL25-0496. 8th Addendum to the Sierra Vista Specific Plan EIR; Conditional Use Permit, Design Review Permit, and Tentative Parcel/Subdivision Map; Proposed Resolution No. 26-396/26-397

Dear Mayor and Councilmembers:

I. Introduction and Summary

Protect Roseville Neighborhoods ("PRN") submits these comments in support of its appeal of the Planning Commission's August 13, 2026 approval of the Sierra View Shopping Center. The appeal was filed on August 24, 2026 by M. R. Wolfe & Associates on PRN's behalf. The appeal form identifies the appellant as "Protect Roseville Neighbors" (Packet p. 879); that is the same organization. This letter supplements PRN's August 13, 2026 letter to the Planning Commission (Packet pp. 881–886), which PRN incorporates by reference. PRN asks that this letter and every document it cites be included in the administrative record for File #PL25-0496.

PRN supports well-planned commercial development at this corner. PRN's concern is narrower: on the record now before the Council, several of the findings the Council is asked to adopt rest on analyses that were never done, on studies that are not in the Council's packet, or on staff assertions that the record does not support. This letter responds to staff's and the applicant's responses to PRN's August letter (Packet pp. 844–845, 898–906, 907–917), identifies issues that have not yet been addressed (several of them documented in the City's own files), and, in Section XI, withdraws or narrows points that the conditions of approval have since resolved.

Citation conventions. "Packet p." refers to the page number printed on the 1,218-page agenda packet for the October 21, 2026 meeting. "Access Study" refers to the Fehr & Peers Sierra View Shopping Center Site Access Study memorandum dated June 4, 2026. "HRA" refers to the June

2026 Health Risk Assessment. "Noise Study" refers to the Saxelby Acoustics study dated June 23, 2026. "COA" refers to a condition of approval. Sources outside the packet are listed in Attachment B.

Summary of principal issues

1. **The Council does not have the technical studies before it.** The Addendum's four attachments (the applicable mitigation measures, Access Study, Noise Study, and HRA) and the Planning Commission report's three technical attachments are not in the Council's packet (Section III).
2. **The Conditional Use Permit's scope is internally inconsistent.** The agenda and resolution describe a CUP for two drive-through restaurants, while the Addendum and the Project Description incorporated by COA 2 describe three. The third, Building 1, relies on a 2021 approval for a 910-square-foot kiosk; the building now proposed is 3,000 square feet (Section IV).
3. **A 2021 City-adopted noise analysis for this same parcel found a nighttime exceedance at the apartment property line.** The mitigation it required (a 10-foot barrier or 7 a.m.–10 p.m. drive-through hours) is not carried into the conditions, and the current analysis excluded the apartments from the ambient-increase test (Section V).
4. **The Addendum's traffic-consistency finding compares floor area, not trips, and excludes the fuel station.** Using the Access Study's own trip rates, the project generates roughly one-third more PM peak-hour trips than the floor-area equivalent the Addendum relies on (Section VI.A).
5. **The Fiddyment Road/Pleasant Grove Boulevard intersection was not analyzed.** The City's 2022 Fehr & Peers analysis for the Grocery Outlet project found its left-turn queues already exceed available storage, and Driveway 4 is 10 feet short of the City's spacing standard (Section VI.B).
6. **Drive-through stacking was never analyzed.** Drive-through operations are deferred to a future permit modification (Section VI.C).
7. **The HRA contains no cumulative analysis and reports no result for the adjacent apartments.** It does not account for the Safeway fuel facility across the intersection, which that project's environmental document describes as 16 pumps, twice the number stated in this record (Section VII).
8. **The cumulative setting is not identified in the Addendum at all.** Three grocery stores, at least five drive-through restaurants, two fuel stations (24 pumps), and a 192-unit affordable apartment complex are now concentrated at one intersection. None of the three neighboring commercial projects is within the Sierra Vista Specific Plan (Section VIII).

9. **The proposed resolution contains errors** that must be corrected before adoption (Attachment A).
10. **Key environmental documents referenced by the Addendum appear to be unavailable.** PRN located the Access Study and HRA but could not locate the Saxelby Noise Study or the listed SVSP Applicable Mitigation Measures attachment in either the project website materials or the Council packet (Section III).

Requested action (Section X): grant the appeal and deny the entitlements; or, alternatively, refer the matter back to the Planning Commission under RMC § 19.80.080 with direction to complete the specific analyses listed; or, with the applicant's consent, continue the hearing. If the Council nonetheless approves the project, PRN asks that the Council grant the appeal in part and add the conditions listed in Section X.D.

II. Standard of Review and the Council's Discretion

A. The Council hears this matter de novo

An appeal of a Planning Commission decision is "a de novo hearing on the matter being appealed." (RMC § 19.80.070(A).) The Council may grant the appeal, grant it in part, or deny it; may modify, delete, or add conditions; and may refer the matter back to the Planning Commission, including where information was not made available to the Commission. (RMC §§ 19.80.070(A), 19.80.080.) The Council is therefore not bound by the Commission's findings and must make its own.

B. The entitlement findings are independent of CEQA

The CUP requires three findings, including that the use's "location, size, design, and operating characteristics" are "compatible with and shall not adversely affect or be materially detrimental to the health, safety, or welfare of persons residing or working in the area." (RMC § 19.78.060; Packet pp. 853–854, 847.) Design Review Finding 2 requires site design providing "vehicle, pedestrian and bicycle circulation … which results in a safe, efficient, and harmonious development." (Packet pp. 847–848.) Findings must be supported by evidence in the record and must "bridge the analytic gap between the raw evidence and ultimate decision." (*Topanga Assn. for a Scenic Community v. County of Los Angeles* (1974) 11 Cal.3d 506, 515.)

The applicant's counsel argues that "[a]ccess, traffic, and circulation impacts and related improvements … are not cognizable impacts under CEQA." (Packet p. 914.) PRN agrees that, after SB 743, congestion and level of service are no longer CEQA impacts. (CEQA Guidelines § 15064.3; Pub. Resources Code § 21099.) That does not remove access, queuing, and safety from the Council's consideration. Those issues are central to CUP Finding 3 and Design Review Finding 2, and geometric design hazards remain a CEQA checklist question that the Addendum itself

answers (Appendix G, item XVII(c); Packet p. 961). Because this is a commercial project, the State-law limits on local discretion over housing development projects do not apply. The Council's discretion here is broad.

C. The CEQA standard

PRN acknowledges that the City's decision to proceed by addendum is reviewed under the substantial-evidence standard, not the "fair argument" standard that PRN's August letter invoked. (*Friends of College of San Mateo Gardens v. San Mateo County Community College Dist.* (2016) 1 Cal.5th 937.) That standard still requires actual evidence. Substantial evidence means "facts, reasonable assumptions predicated upon facts, and expert opinion supported by facts," and does not include "[a]rgument, speculation, unsubstantiated opinion or narrative." (CEQA Guidelines § 15384.) The explanation for not preparing a subsequent EIR "must be supported by substantial evidence" (§ 15164(e)), and the Council "shall consider the addendum with the final EIR" before deciding (§ 15164(d)). As shown below, several of the Addendum's key conclusions rest on staff assertions made in response memoranda rather than on analysis in the record.

III. The Council's Packet Omits the Studies on Which the Addendum and Findings Rely

The Addendum lists four attachments: (1) SVSP Applicable Mitigation Measures; (2) the Access Study; (3) the Environmental Noise Assessment; and (4) the HRA. (Packet p. 969.) None is in the Council's packet; the Addendum ends at page 969 and Exhibit B (Project Plans) begins at page 970. The Planning Commission staff report likewise lists the HRA, Noise Study, and Access Study as Attachments 1–3 (Packet p. 878), but the copy provided to the Council as City Council Attachment 1 (Packet pp. 851–878) does not include them.

This is not a formality. Staff's responses rely on specific contents of these documents that the Council cannot check. Examples include the "subsequent speed study … (Appendix A of Attachment 3)" (Packet p. 858), the Noise Study's "page 5," "Figure 3," and "Tables 2 and 11" (Packet p. 903), and the HRA's methodology (Packet p. 904). The CUP and Design Review conditions require compliance with "all required environmental mitigation identified in the [SVSP EIR] and Addenda" (CUP COA 4, DR COA 3; Packet pp. 864–865) without listing the measures. The list is in the omitted Attachment 1. As explained in Section V, whether SVSP Mitigation Measure 4.6-2 carries forward the drive-through noise controls adopted for this parcel in 2021 cannot be determined from the packet.

PRN was able to locate the Access Study and Health Risk Assessment referenced by the Addendum on the City's Projects of Interest webpage but was unable to locate either the Saxelby Environmental Noise Assessment or the SVSP Applicable Mitigation Measures attachment. PRN likewise could not locate those documents in the Planning Commission packet or the City Council packet. If these materials are part of the administrative record, they should be identified and

made available to the Council and the public before action is taken. If they are not before the Council, then key conclusions and conditions that depend upon them cannot be independently reviewed or verified.

Request: Before acting, the Council should have the complete Addendum, including Attachments 1–4, in its packet and posted for the public. (CEQA Guidelines § 15164(d).)

IV. The CUP Is Internally Inconsistent, and Building 1 Rests on a 2021 Approval for a Different Project

A. Two drive-throughs or three?

The agenda, the Council staff report, the Planning Commission staff report, and the proposed resolution describe a CUP "to allow a fueling station and two drive-through restaurants." (Packet pp. 841, 851.) The 8th Addendum describes a CUP "to allow a fueling station and three drive-through restaurants." (Packet pp. 920, 925.) The applicant's Project Description (Exhibit E) states that CUPs are required for "drive-through establishments (Buildings 1, 3 and 6)" and the fuel station (Packet pp. 1033–1034). CUP COA 2 approves the project "as identified and shown in Exhibits A - E" (Packet p. 864), which incorporates both the Addendum and Exhibit E. The Planning Commission's CUP Finding 3 analysis also evaluates Building 1 (Packet p. 854).

The Council cannot adopt CUP findings without knowing which uses the permit covers. If the CUP covers two drive-throughs, the incorporated exhibits are inconsistent with it and Building 1 has no current CUP (see B below). If it covers three, the agenda description and resolution are inaccurate.

B. Building 1 is not the project approved in 2021

Staff states that Building 1 is "consistent with the prior approval for that parcel in File #PL20-0142" and that "the previous MND adequately describes potential impacts of developing this area with a drive-thru coffee building." (Packet pp. 842, 845–846.) The 2021 Coffee Kiosk Mitigated Negative Declaration (Exhibit F) describes a different project:

Feature	2021 Coffee Kiosk (PL20-0142)	Building 1 (PL25-0496)
Building size	910 sq. ft. (Packet pp. 1035, 1040)	3,000 sq. ft. (Packet pp. 860, 973)
Parking	13 spaces (Packet p. 1040)	30 spaces (Packet p. 860)
Drive-through stacking	380 ft. / 19 vehicles, measured to pick-up window (Packet p. 1040)	Not analyzed (Access Study; Packet p. 902)

Feature	2021 Coffee Kiosk (PL20-0142)	Building 1 (PL25-0496)
Access	Own right-in/right-out driveway on Pleasant Grove Blvd. with deceleration lane (Packet p. 1040)	Shared center access (Driveways 1 and 2)
Distance to apartment parcel (JM-30)	Adjacent; noise exceedance found at HDR line to south (Packet p. 1069)	110 ft. from JM-30 site (Packet p. 854)

The record does not explain how an MND for a 910-square-foot kiosk "adequately describes" a 3,000-square-foot restaurant generating 117 PM peak-hour trips (Access Study, Table 1). Nor does it establish that the 2021 CUP remains in effect. That project was approved in 2021 and "never constructed" (Packet p. 842), and the CUP now proposed carries a two-year effectuation period (CUP COA 1; Packet p. 864). The record also gives three different dates for the 2021 approvals (see Attachment A, item 6). Building 1 is the drive-through closest to residents: 110 feet from the apartment parcel and more than 150 feet from existing homes (Packet p. 854).

Request: The Council should (1) determine on the record whether the CUP covers two or three drive-throughs; (2) determine whether the PL20-0142 CUP remains valid and, if so, whether it authorizes a 3,000-square-foot building; and (3) include Building 1 in this CUP, with its own findings and conditions.

V. Noise: Contrary Evidence in the Record Has Not Been Reconciled

A. The nearest residents were excluded from the ambient-increase analysis

Staff and the applicant confirm that Receivers R9 and R10, which represent the Sierra Vista Apartments, were excluded from the Noise Study's ambient-increase tables (Tables 12–13). (Packet pp. 903, 915.) The Addendum's noise discussion reports increases only at the single-family homes to the south (R7/R8, +0.7 dBA) and does not mention the apartments. (Packet p. 954.) The apartments are the residential use closest to the grocery building (134 feet), the loading door and trash compactor (267 feet), and Building 1's drive-through (110 feet). (Packet pp. 854, 1032.)

B. Staff's "no existing residents" rationale misapplies the baseline

Staff reasons that the 3-dB ambient-increase threshold "applies not to future land use compatibility, but to existing people," and that "there are no existing people at locations R9 and R10." (Packet p. 903.) The apartments are not hypothetical. They were approved on November 19, 2025 (PL25-0280) and are under construction (Packet p. 842), and their 192 households will be living there when the center operates. CEQA permits an agency to define baseline conditions

"by referencing … conditions expected when the project becomes operational" where supported by substantial evidence (CEQA Guidelines § 15125(a)(1)). It bars only "hypothetical conditions," such as uses allowed under a permit or plan that have never actually occurred (§ 15125(a)(3)). An approved affordable-housing project under construction on the adjoining parcel is the kind of expected condition § 15125(a)(1) contemplates. The question the ambient-increase test asks is how much the noise environment of nearby residents will change, and it was not answered for the nearest residents.

C. Staff's substitute assurance is not analysis

Staff states that, based on "Figure 3 and Tables 2 and 11, plus the 6-foot masonry wall," "the evidence does not support a conclusion" that R9 and R10 "would experience an increase in ambient noise exceeding 3 dB." (Packet p. 903.) No ambient levels for R9/R10, no predicted project levels at R9/R10, and no daytime or nighttime increase calculation appear in the Council's packet. The cited tables are in a study the Council does not have (Section III). An unquantified conclusion in a response memorandum is the kind of "unsubstantiated opinion or narrative" that § 15384 excludes from substantial evidence.

D. The City found a nighttime exceedance on this parcel in 2021

The City's own 2021 environmental document for this parcel reached the opposite conclusion. The Coffee Kiosk MND (Exhibit F), relying on an environmental noise assessment by Bollard Acoustical Consultants, found that drive-through operations on Parcel W-20:

> "are predicted to exceed the nighttime hourly average noise level standards at the future High Density Residential property line to the south, if the hours of operation extend into nighttime hours (10:00 p.m. to 7:00 a.m.)." (Packet p. 1069.)

Mitigation Measure NOI-1(d) therefore required either "the construction of a 10' solid noise barrier along the southern project property boundary" or limiting "drive-through operations to the hours between 7:00 A.M. to 10:00 P.M." (Packet p. 1087.) The Addendum states that the W-20 measures "remain applicable" through an "equivalent" SVSP measure, MM 4.6-2. (Packet pp. 923–924.) However:

- the project proposes a 6-foot wall, not a 10-foot barrier (Packet pp. 855, 1032);
- the CUP conditions limit only delivery-truck operations to 7 a.m.–10 p.m. (CUP COA 3; Packet p. 864), and drive-through hours are not restricted;
- drive-through operating hours are unknown, and operations are deferred to a future CUP modification (CUP COA 2; Packet pp. 856, 864);
- Building 1 is now more than three times the size of the kiosk analyzed in 2021; and
- the text of MM 4.6-2 is in the omitted Addendum Attachment 1, so the Council cannot confirm it contains the NOI-1(d) requirement.

The record therefore contains two acoustical analyses of drive-through operations on the same parcel that reach different conclusions about nighttime compliance at the same residential property line. Only one of them is in the packet, and the Addendum does not reconcile them.

E. Delivery hours conflict

The Project Description (Exhibit E) states that grocery deliveries "will be staggered during weekdays from 6 am to noon." (Packet p. 1029.) CUP COA 3 limits "[a]ll on-site operations associated with delivery trucks" to 7:00 a.m.–10:00 p.m. (Packet p. 864.) CUP COA 2 approves the project "as identified and shown in Exhibits A - E." The 6–7 a.m. hour falls within the City's nighttime noise period (10 p.m.–7 a.m.; Packet p. 954). The record does not disclose which delivery schedule the Noise Study modeled.

Requests: (1) complete the ambient-increase analysis for R9 and R10, daytime and nighttime, and disclose the operating hours assumed for each drive-through and for deliveries; (2) reconcile the 2026 Noise Study with the 2021 Bollard analysis; and (3) at a minimum, impose NOI-1(d) expressly for Building 1 (and Buildings 3 and 6 unless analysis demonstrates nighttime compliance) and conform Exhibit E to COA 3.

VI. Transportation, Access, and Circulation

A. The Addendum compares floor area, not trips, and excludes the fuel station

The Addendum concludes that "[t]he trip generation characteristics of the proposed project are within the scope of the SVSP EIR transportation analysis." (Packet p. 944.) The comparison it actually performs is a floor-area comparison. The City's 2035 model assumes 66,000 square feet of office and 41,000 square feet of retail on the site, "converted" to an "equivalent retail development of 80,000 square feet," against which the Addendum compares "62,000 square feet of retail land use." It also states that "the number of pumps is not a model input." (Ibid.) The applicant's counsel relies on the same square-footage comparison. (Packet p. 913.)

Trip generation for this project is driven by use type, not floor area. The Access Study's Table 1 (weekday PM peak hour) shows:

Use (ITE code)	Size	Rate	Gross PM trips	Share of trips
Gas station with convenience store (945)	8 fueling positions	19.1 / position	153	18%
Coffee shop with drive-through (937)	3.0 ksf	39.0 / ksf	117	14%
Two quick-serve restaurants with drive-through (934)	6.8 ksf	31.5 / ksf	215	26%

Use (ITE code)	Size	Rate	Gross PM trips	Share of trips
Retail including supermarket (821)	43.8 ksf	7.8 / ksf	343	41%
Total gross			828	
Less internal (−82) and pass-by (−392)			354 new	

The drive-throughs and fuel station occupy about 25% of the project's floor area (14,451 of 58,210 square feet) but generate about 59% of its gross PM peak-hour trips (485 of 828). Applying the Access Study's own retail rate (7.8 trips per 1,000 square feet, ITE 821) to the 80,000-square-foot "equivalent" the Addendum relies on yields about 624 gross PM peak-hour trips. The project generates 828, about 204 trips or 33% more. The 153 fuel-station trips are excluded by the Addendum's own method. PRN offers this calculation to show what the Addendum omits, not as a substitute traffic study. The point is that the Addendum's trip-consistency conclusion is not supported by any trip comparison. (Also note that the Addendum's "62,000 square feet of retail" does not match the project's 58,210-square-foot total; Attachment A, item 8.)

The Addendum's VMT reasoning has a related gap. It finds the center "local-serving" because "[m]any of the commercial uses anticipated for the Sierra View Shopping Center project are currently located several miles away from residents." (Packet p. 944; see also pp. 960–961.) That statement does not account for the Safeway-anchored West Roseville Marketplace and the Grocery Outlet center at the same intersection (Section VIII).

B. The Fiddyment Road/Pleasant Grove Boulevard intersection was not analyzed

The Access Study analyzed whether southbound queues at the downstream Fiddyment Road/Vista Grande Boulevard intersection would block Driveway 4 (Access Study, footnote 1). It did not analyze queues at the Fiddyment Road/Pleasant Grove Boulevard intersection, 390 feet to the north. It refers to vehicles queued in that intersection's northbound left-turn lane only to confirm they do not block a sight line. The City's own consultant analyzed that intersection for the Grocery Outlet project (PL22-0205) in 2022:

- The northbound left-turn and westbound left-turn movements each have 250 feet of storage per lane, and the maximum queues under existing conditions "[e]xceed[] available storage." (Fehr & Peers, Grocery Outlet access memorandum, July 21, 2022, Table 4, based on February and April 2022 counts.)
- The Grocery Outlet project alone "would add 14 vehicles to the northbound left-turn movement and 19 vehicles to the westbound left-turn movement," which "would cause further queue spillbacks out of each pair of dual left-turn lanes." (Id., p. 6.)

- Citing the City's 2035 forecasts, the intersection "is expected to operate at LOS F during the weekday AM peak hour and LOS E during the weekday PM peak hour." (Id., p. 9.)

Driveway 4, with its new left-turn ingress from northbound Fiddyment Road, is 390 feet south of this intersection, 10 feet short of the City's 400-foot standard. (Access Study, p. 4; Packet p. 858.) The Access Study states, "We do not have any background information with respect to why the driveway is spaced at its current location." (Access Study, p. 4.) The explanation offered for the shortfall (potential conflict with an existing power tower) appears only in staff's response memorandum (Packet p. 901), and the record contains no documented design exception. Neither document evaluates whether the northbound left-turn queue, already documented as exceeding storage, extends to the Driveway 4 median opening. That interaction is what the 400-foot spacing standard addresses, and it bears directly on the 10-foot shortfall and on Design Review Finding 2.

Request: a queuing analysis of the Fiddyment/Pleasant Grove intersection using cumulative volumes that include West Roseville Marketplace, Grocery Outlet, and Sierra View, and written documentation of any exception to the driveway-spacing standard and its basis.

C. Drive-through stacking has not been analyzed

The Access Study states that "as no specific users are known for the restaurants that would include drive-through lanes, it was not possible to conduct analysis of their vehicle storage requirements." Staff responds that "[a]ll three drive-through's meet the City's design standard for queue lengths, and thus a queuing analysis was not required." (Packet p. 902.) Staff does not identify the standard, and neither the staff reports nor the Addendum state the stacking length provided in any lane. The three drive-throughs account for 332 gross PM peak-hour trips (Access Study, Table 1). For the 910-square-foot kiosk alone, the City in 2021 documented 380 feet of stacking for 19 vehicles. (Packet p. 1040.) CUP COA 2 defers drive-through operations to a future CUP modification "[o]nce tenants … are identified" (Packet p. 864), yet the Council is asked to find the drive-through uses compatible now.

Request: identify the City standard and the stacking provided for each lane; prepare a reasonable worst-case queuing analysis; and condition the approval so that queues may not extend into drive aisles, driveway throats, or the public right-of-way, under an enforceable queue-management plan.

D. Fuel-station access (Access Study Recommendation 7)

The Access Study found that motorists entering from Driveway 4 who want the fuel pumps must "perform a reverse u-turn at the first internal intersection," and recommended that the City "[r]edesign the southerly part of the convenience market / fueling pumps site layout." Staff responds that this is "not a design issue related to safety" and that drivers may use a second entry. (Packet p. 902.) COA 25, however, requires the applicant to "incorporate all of the site plan recommendations" of the Access Study. (Packet p. 867.) PRN could not identify a revised fuel-

station layout on Sheet C2.0 of the plans before the Council. (Packet p. 973.) Either Recommendation 7 is required by COA 25, in which case the approved site plan will change after approval without public review, or it is not, in which case COA 25 overstates what has been incorporated. The Council should know which before making Design Review Finding 2.

VII. Air Quality and Health Risk

A. Scope of the HRA

The HRA models only the gasoline dispensing facility and reports only the maximally exposed receptor (cancer risk 1.12 in a million; HRA Table 3; Packet p. 936). PRN accepts that CARB and the Placer County APCD do not classify a grocery loading dock or trash compactor as a significant toxic air contaminant source, as staff and the applicant state. (Packet pp. 904, 916.) Two gaps remain. First, the HRA identifies the Sierra Vista Apartments as a sensitive receptor but reports no result for them. Second, the record does not quantify diesel exhaust from the projected ten heavy-truck and fifteen medium-truck deliveries per week (Packet p. 1029), fuel-tanker deliveries, or idling at three drive-through lanes. PRN does not contend that these sources necessarily exceed thresholds. The point is that CUP Finding 3 (no detriment to health) is being made without that information.

B. No cumulative fuel-station analysis

The West Roseville Marketplace at the northeast corner of the intersection includes a fuel facility. The Sierra View Project Description calls it "an eight-pump fuel station." (Packet p. 1028.) The City's 2022 Mitigated Negative Declaration for that project (SCH #2022090665) describes "a gas station including 8 dispensers (total of 16 pumps)." That is twice the number stated in this record. The HRA's maximally exposed receptor is a residence about 500 feet north of the project's fuel station, across Pleasant Grove Boulevard (Packet p. 855). The Safeway facility is also on the north side of the same intersection. The HRA contains no cumulative analysis and does not mention the Safeway facility. The applicant relies on the SVSP EIR's 2010 plan-level conclusion on cumulative TAC emissions (Packet p. 917, citing SVSP EIR p. 5-138). The record does not show that the 2010 analysis addressed two fueling stations, totaling 24 pumps, at this intersection.

Staff notes that the Air District will review an HRA when it issues the Authority to Construct. (Packet p. 904.) That review occurs after the Council acts and is not before the Council now.

Request: a cumulative screening analysis of both fuel facilities at the maximally exposed receptor and at the apartments, and a receptor-specific result for the apartments.

VIII. Cumulative Impacts and Changed Circumstances

Since the SVSP EIR was certified in 2010, the following projects have been approved at the Fiddyment Road/Pleasant Grove Boulevard intersection:

Project	Location	Principal uses	CEQA document	Status
Sierra View Shopping Center (PL25-0496)	SW corner (SVSP)	23,272 sf grocery; 3 drive-through restaurants (9,751 sf); 24-hour fuel station, 4 dispensers / 8 pumps; retail. Total 58,210 sf	8th Addendum to 2010 SVSP EIR	Pending
West Roseville Marketplace (1798 Pleasant Grove Blvd.)	NE corner (outside SVSP)	±55,600 sf grocery (Safeway); ±14,000 sf shops; ±5,500 sf drive-through pad; fuel, 8 dispensers / 16 pumps	MND, SCH #2022090665 (2022)	Under construction (Packet p. 1028)
Grocery Outlet (1751 Pleasant Grove Blvd., PL22-0205)	SE quadrant, east of CVS (outside SVSP)	16,000 sf grocery; 3,200 sf fast-food drive-through; 4,600 sf retail	Class 32 infill exemption (Packet p. 912)	Approved 2023 (appeal denied July 2023); parcel map Feb. 2026; under construction
CVS Pharmacy	SE corner (outside SVSP)	Drugstore	—	Constructed (Packet p. 924)
Sierra Vista Apartments (PL25-0280)	Adjacent, west (SVSP JM-30)	192 affordable units in eight three-story buildings	Objective Design Standards approval, Nov. 19, 2025	Under construction (Packet p. 842)

Taken together, these projects place three grocery stores (about 95,000 square feet), at least five drive-through restaurants, and two fuel stations with 24 pumps at a single intersection, next to a 192-unit affordable housing community. Sierra View and Grocery Outlet alone account for 1,107 gross PM peak-hour trips (828 + 279) according to their Fehr & Peers analyses.

The Addendum does not identify this setting. Its surrounding-uses table lists only the CVS to the east (Packet p. 924). PRN found no reference anywhere in the Addendum to the West Roseville Marketplace, Safeway, or Grocery Outlet. Staff and the applicant respond that the SVSP EIR analyzed cumulative buildout and that "[t]hese projects do not represent changed

circumstances; they implement the adopted SVSP." (Packet pp. 844, 899–900, 912–913.) That response has three problems:

1. **The neighboring commercial projects are not in the SVSP.** The SVSP covers land "west of Fiddyment Road" (Packet p. 841). The Marketplace, CVS, and Grocery Outlet are all east of Fiddyment Road. They do not "implement the adopted SVSP." The applicant's counsel itself attributes Grocery Outlet to a different plan. (Packet p. 912.) The record does not show what land uses the 2010 SVSP EIR assumed for those parcels in its cumulative analysis.
2. **No document has analyzed these projects together.** The Marketplace was approved under a 2022 MND, and Grocery Outlet under a categorical exemption that involves no cumulative analysis. Grocery Outlet's own traffic memorandum noted the adjacent SVSP as a future source of retail that could change trip distribution but did not analyze it (Grocery Outlet memo, p. 4, fn. 3). Sierra View is the first approval at which the combined effects can be examined, and the Addendum does not examine them.
3. **The 2010 analysis horizon has passed.** The Addendum describes the SVSP EIR's traffic-noise findings in terms of "the year 2025 plus project" (Packet p. 954). The Access Study uses the City's 2035 model and its 2045 cumulative analysis. The City's current 2035 forecast, cited in the 2022 Grocery Outlet analysis, is LOS F (AM) and LOS E (PM) at this intersection.

Whether these facts amount to "[s]ubstantial changes … with respect to the circumstances under which the project is undertaken" (CEQA Guidelines § 15162(a)(2)) is an evidentiary question. The § 15164(e) explanation must answer it with substantial evidence. At a minimum, staff should identify, with citations to the SVSP EIR, the land-use and trip assumptions the 2010 analysis used for the three neighboring commercial parcels, and explain why two fuel stations, five drive-throughs, and three grocery stores at one intersection fall within them. A conclusory statement that the projects "implement the adopted SVSP" is not accurate as to those parcels and does not supply that evidence.

IX. Land-Use Compatibility and the Required Findings

CUP Finding 3 (compatibility; no detriment to health, safety, or welfare). The project places Building 1's drive-through 110 feet from the apartment parcel, Building 2 116 feet and the grocery 134 feet from the nearest apartment units, and the grocery loading door and compactor 267 feet from them; the single-family neighborhood on JM-2 is 253 feet south of the site. (Packet pp. 854, 1032.) The fuel station operates 24 hours. (Packet p. 1029.) Drive-through hours are unknown and their operations are deferred. On the record described in Sections IV, V, VI.C, and VII, the Council cannot find these uses compatible without the missing analysis or, at a minimum, binding operating conditions.

Design Review Finding 2 (safe, efficient circulation). This finding depends on the unresolved items in Sections VI.B through VI.D: the Driveway 4 spacing shortfall in the presence of documented intersection queue spillback, unanalyzed drive-through stacking, and the status of the fuel-station redesign.

Map findings. Map Finding 1 relies on access and circulation "reviewed with the Design Review Permit and found to be adequate." (Packet pp. 862–863.) It therefore stands or falls with Design Review Finding 2. The resolution also approves a "Tentative Parcel Map" while adopting findings drafted under RMC § 18.06.180 for a "tentative subdivision map," and the record describes the resulting parcels as both seven and eight. (Attachment A, items 3–4.) The instrument being approved must be identified correctly before findings are adopted.

X. Requested Actions

PRN respectfully requests that the Council take one of the following actions.

A. Grant the appeal and deny the entitlements

Grant the appeal; decline to rely on the 8th Addendum on the present record; and deny the Conditional Use Permit, together with the Design Review Permit and map that depend on it, because the required findings are not supported by the record (RMC § 19.80.070(A)).

B. Alternatively, refer the matter back to the Planning Commission

Under RMC § 19.80.080, refer the matter back to the Planning Commission. Information material to its decision was not available to it: the staff report was published August 10 for an August 13 hearing (Packet p. 887); staff's response memorandum and the applicant's counsel's letter were provided only at or immediately before the hearing; the 2021 noise finding was not addressed; and the 2022 intersection queue data and the Marketplace's 16-pump fuel facility were not before the Commission. The referral should direct preparation of the following:

1. an ambient-increase noise analysis for R9 and R10, daytime and nighttime, disclosing assumed drive-through and delivery hours, and reconciling the 2021 Bollard analysis;
2. a trip-based (not floor-area) comparison to the SVSP EIR and model assumptions, including the fuel station;
3. a cumulative queuing analysis of the Fiddyment Road/Pleasant Grove Boulevard intersection and its interaction with Driveway 4, plus documentation of any driveway-spacing exception;
4. a drive-through stacking analysis for Buildings 1, 3, and 6;
5. a cumulative HRA screening that includes the Marketplace fuel facility, with receptor-specific results for the apartments;
6. clarification of the CUP's scope and the status of the PL20-0142 approval for Building 1;

7. clarification of whether Access Study Recommendation 7 (fuel-station redesign) is required, with a revised plan if so; and
8. publication of the complete Addendum, including Attachments 1–4.

C. Alternatively, continue the hearing with the applicant's consent

If the applicant consents, continue the hearing to a date that allows the items in Section X.B to be completed and circulated before the Council acts.

D. If the Council approves, grant the appeal in part and add conditions

If the Council approves the project, PRN asks that it grant the appeal in part and add the following conditions under RMC § 19.80.070(A):

1. **Drive-through hours.** Limit drive-through operations at Buildings 1, 3, and 6 to 7:00 a.m.–10:00 p.m., consistent with 2021 MM NOI-1(d), unless and until an acoustical analysis reviewed at a noticed public hearing demonstrates compliance with nighttime standards at the apartment property line. Alternatively, require the 10-foot solid barrier specified in NOI-1(d).
2. **Delivery hours.** Strike the "6 am" delivery window from Exhibit E and conform all exhibits to CUP COA 3, expressly including fuel-tanker deliveries.
3. **Drive-through stacking.** Establish a minimum stacking length for each lane based on a reasonable worst-case queuing analysis, and require an enforceable queue-management plan prohibiting queues in drive aisles, driveway throats, or the public right-of-way.
4. **CUP modification hearing.** Require that the CUP modification under COA 2 be heard by the Planning Commission at a noticed public hearing, with mailed notice to the Sierra Vista Apartments, and with tenant-specific noise and queuing analyses.
5. **Fuel-station layout.** Require the Access Study Recommendation 7 redesign to be shown on revised plans and approved before any building permit is issued for Building 5.
6. **Cumulative health risk.** Require that a cumulative HRA including the Marketplace fuel facility be completed and made public before issuance of the Authority to Construct or a building permit for Building 5.
7. **Resolution corrections.** Correct the errors listed in Attachment A.

XI. Issues PRN Considers Resolved or Narrowed

In the interest of an accurate record, PRN acknowledges the following:

- **Driveway 2.** COA 26 requires a 38-foot driveway, and the Access Study states that the recommended 21-foot inbound lane "provides sufficient width to allow the left-turning vehicle to be passed." PRN withdraws its Driveway 2 objection, provided the improvement plans conform.

- **Drive aisle behind Building 2.** The site plan shows speed bumps (Sheet C2.0; Packet p. 973), as the Access Study notes. PRN withdraws this point.
- **Frontage improvements.** COAs 28–31 make binding the deceleration lanes, bus turnout, and 300-foot left-turn pocket recommended by the Access Study. (Packet p. 868.) PRN no longer contends these are unconditioned. Its remaining Driveway 4 concern is stated in Section VI.B.
- **HRA distances.** PRN's August letter compared the 134-foot and 267-foot distances (grocery building and loading door) with the HRA's 500-foot fuel-station receptor. Those distances measure different sources, and PRN no longer relies on that comparison. Its remaining air-quality concerns are stated in Section VII.
- **Standard of review.** As stated in Section II.C, PRN acknowledges that the substantial-evidence standard governs the City's reliance on the Addendum.

XII. Conclusion

The issues above do not depend on disagreement with the City's consultants. Most come from the City's own documents: the 2021 MND for this parcel, the 2022 Grocery Outlet analysis, the Marketplace MND, the Access Study's trip table, and the conditions and exhibits the Council is asked to adopt. Each can be resolved with targeted analysis and clear conditions. Until it is, PRN respectfully submits that the record does not support the CUP and Design Review findings, or the explanation required by CEQA Guidelines § 15164(e), and asks the Council to grant the appeal or, alternatively, refer the matter back to the Planning Commission. PRN appreciates the Council's consideration.

Respectfully submitted,

James Adamic

Protect Roseville Neighborhoods
ProtectRosevilleNeighborhoods@gmail.com
Roseville, CA

Attachments: A – Record Errors and Inconsistencies; B – Sources Cited Outside the Agenda Packet

Attachment A: Record Errors and Inconsistencies

The following items appear in the documents the Council is asked to adopt or incorporate. Each should be corrected or reconciled before adoption.

#	Item	Discrepancy	Record location
1	Resolution number	Agenda identifies Resolution No. 26-396; staff report attachment list and resolution itself are No. 26-397.	Agenda Item 30(b); Packet pp. 846–847
2	Hearing date recital	Resolution recites "after holding a hearing on October 7, 2026"; the hearing is October 21, 2026.	Packet p. 849
3	Map type	"Tentative Subdivision Map" (PC report, Addendum, Exhibit E) vs. "Tentative Parcel Map" (resolution, Council recommendation, Exhibit E fn. 1). Findings are drafted for a subdivision map under RMC § 18.06.180.	Packet pp. 841–842, 847–849, 851, 862–864, 920, 925, 1030, 1034
4	Number of parcels	Eight parcels (staff report, resolution, Addendum) vs. "seven parcels" (Exhibit E fn. 1).	Packet pp. 842, 847, 925, 1030
5	CUP scope	Two drive-throughs (agenda, staff reports) vs. three (Addendum; Exhibit E lists Buildings 1, 3, 6).	Packet pp. 841, 851 vs. 920, 925, 1033–1034
6	Coffee Kiosk approval dates	MND "adopted on February 11, 2023" vs. Initial Study dated January 14, 2021, comment period ending February 4, 2021; approval dated "March 17, 2021" (staff report) vs. "April 2021" (Addendum).	Packet pp. 842, 845, 863, 923, 1035
7	Building 1 vs. prior approval	910 sf kiosk (2021 MND) described as "consistent with" a 3,000 sf drive-through restaurant.	Packet pp. 842, 923, 1035, 1040

#	Item	Discrepancy	Record location
8	Retail floor area	Addendum compares "62,000 square feet of retail land use"; project total is 58,210 sf.	Packet pp. 920, 925, 944
9	Building areas	PC report Table 1 lists Building 2 at 16,472 sf and Building 3 at 3,376 sf; plans and Exhibit E state 16,742 sf and 3,736 sf.	Packet pp. 860, 973
10	Delivery hours	Exhibit E: deliveries "from 6 am to noon"; CUP COA 3: 7:00 a.m.–10:00 p.m.; COA 2 approves Exhibits A–E.	Packet pp. 864, 1029
11	Safeway fuel facility	Exhibit E: "eight-pump fuel station"; West Roseville Marketplace MND: "8 dispensers (total of 16 pumps)."	Packet p. 1028; SCH #2022090665
12	Addendum attachment reference	Noise discussion cites the noise study as "Attachment 1"; attachment list identifies it as Attachment 3.	Packet pp. 954, 969
13	Missing attachments	Addendum Attachments 1–4 and PC report Attachments 1–3 are not in the Council packet.	Packet pp. 878, 969–970
14	Appellant name	Appeal form names "Protect Roseville Neighbors"; the organization is Protect Roseville Neighborhoods.	Packet p. 879

Attachment B: Sources Cited Outside the Agenda Packet

- Fehr & Peers, *Sierra View Shopping Center Site Access Study* (RS26-4455), memorandum to J. Varozza, June 4, 2026. City of Roseville Projects of Interest page: https://www.roseville.ca.gov/Traffic Study Sierra View SC 6-4-26.pdf
- *Health Risk Assessment, Sierra View Shopping Center Project*, June 2026. https://www.roseville.ca.gov/PL25-0496 - Sierra View Shopping Center HRA June 2026.pdf

- Fehr & Peers, *Evaluation of Access and On-Site Circulation for Grocery Outlet Retail Center*, memorandum to J. Varozza, July 21, 2022 (PL22-0205). https://www.roseville.ca.gov/Documents/Development Services/Planning/Projects of Interest/Final Tech Memo 7 21 22.pdf
- CEQAnet, "West Roseville Marketplace," Mitigated Negative Declaration, City of Roseville, SCH #2022090665 (received Sept. 30, 2022). https://ceqanet.lci.ca.gov/2022090665
- City of Roseville, Projects of Interest (Sierra View Shopping Center, PL25-0496; Grocery Outlet, PL22-0205). https://www.roseville.ca.gov/development_services/planning/projects_of_interest/index.php
- Roseville Municipal Code, Chapter 19.80 (Appeals), §§ 19.80.060–19.80.080; § 19.78.060; § 19.12.020; § 18.06.180.
- CEQA Guidelines (Cal. Code Regs., tit. 14) §§ 15064.3, 15125, 15162, 15164, 15384; Pub. Resources Code § 21099.
- *Friends of College of San Mateo Gardens v. San Mateo County Community College Dist.* (2016) 1 Cal.5th 937; *Topanga Assn. for a Scenic Community v. County of Los Angeles* (1974) 11 Cal.3d 506.

Outlook

FW: Agenda Item IX.30 (October 21, 2026) - Supplemental Appeal Comments - Sierra View Shopping Center (PL25-0496)

From Six, Katrina <KMSix@roseville.ca.us>
Date Tue 10/20/2026 8:33 AM
To Casey, Dominick <DCasey@roseville.ca.us>; Sheidenberger, Michelle <MSheidenberger@roseville.ca.us>; Isom, Mike <misom@roseville.ca.us>; Bitter, Greg <GBitter@roseville.ca.us>; Hocker, Lauren <LHocker@roseville.ca.us>
Cc Singer, Eric <EJSinger@roseville.ca.us>

1 attachment (487 KB)
PRN_Council_Letter_Item30_Sierra_View - Copy.pdf;

Good Morning!

Please see the email below. We have uploaded this to the agenda as “Comment Received after Publication.”

Thank you!

Katrina Six, CMC
City Clerk Technician
City Clerk Department

(916) 774-5267
Civic Center | 311 Vernon Street | Roseville, CA 95678

CONFIDENTIALITY NOTICE: This email message and any accompanying documents are for the sole use of the intended recipient(s) and may contain confidential and/or privileged attorney-client information or work product. DO NOT FORWARD. Any unauthorized review, use, disclosure or distribution is prohibited. If you are not the intended recipient, please contact the sender by reply email and destroy all copies of the original message. Thank you.

From: Protect Roseville Neighborhoods <protectrosevilleneighborhoods@gmail.com>
Sent: Monday, October 19, 2026 3:09 PM
To: citycouncil@roseville.ca.gov
Cc: esinger@roseville.ca.gov; City Clerk <CityClerk@roseville.ca.gov>
Subject: Agenda Item IX.30 (October 21, 2026) - Supplemental Appeal Comments - Sierra View Shopping Center (PL25-0496)

External: This email was sent by a person from outside your organization. Exercise caution when clicking links, opening attachments, or taking further action.

Dear Mayor and Councilmembers:

Attached please find comments submitted on behalf of Protect Roseville Neighborhoods regarding Agenda Item IX.30, the Sierra View Shopping Center Appeal (File No. PL25-0496).

Protect Roseville Neighborhoods respectfully requests that this correspondence and its attachment be included in the administrative record for the October 21, 2026 City Council hearing and distributed to all Councilmembers prior to consideration of the item.

Please confirm receipt of our letter and comments at your earliest convenience. Thank you for your time and consideration of our concerns.

Respectfully,

James Adamic

Protect Roseville Neighborhoods
ProtectRosevilleNeighborhoods@gmail.com
Roseville, California

Outlook

FW: Public Comment Support: Appeal-October 21,2026 Meeting

From Six, Katrina <KMSix@roseville.ca.us>
Date Tue 10/20/2026 8:35 AM
To Casey, Dominick <DCasey@roseville.ca.us>; Sheidenberger, Michelle <MSheidenberger@roseville.ca.us>; Singer, Eric <EJSinger@roseville.ca.us>; Isom, Mike <misom@roseville.ca.us>; Bitter, Greg <GBitter@roseville.ca.us>; Hocker, Lauren <LHocker@roseville.ca.us>
Cc City Clerk <CityClerk@roseville.ca.gov>

Good Morning!

Please see the email below. We have uploaded this to the agenda as “Comment Received after Publication.”

Thank you!

Katrina Six, CMC
City Clerk Technician
City Clerk Department

(916) 774-5267
Civic Center | 311 Vernon Street | Roseville, CA 95678

CONFIDENTIALITY NOTICE: This email message and any accompanying documents are for the sole use of the intended recipient(s) and may contain confidential and/or privileged attorney-client information or work product. DO NOT FORWARD. Any unauthorized review, use, disclosure or distribution is prohibited. If you are not the intended recipient, please contact the sender by reply email and destroy all copies of the original message. Thank you.

From: Svetlana Brazhnikova <brazhnikova90@gmail.com>
Sent: Monday, October 19, 2026 11:29 AM
To: City Clerk <CityClerk@roseville.ca.gov>
Subject: Public Comment Support: Appeal-October 21,2026 Meeting

External: This email was sent by a person from outside your organization. Exercise caution when clicking links, opening attachments, or taking further action.

This is the first time you received an email from this sender (brazhnikova90@gmail.com). Exercise caution when clicking links, opening attachments, or taking further action.

Dear Honorable Mayor and Members of the City Council,

My name is Svetlana Brazhnikova, and I am a resident of West Roseville. I am writing to express my strong support for the Sierra View Shopping Center project and to respectfully request that the City Council **deny the appeal** and uphold the Planning Commission's approval.

As West Roseville continues to grow, our neighborhood is in great need of localized retail, dining, and grocery options. The Sierra View Shopping Center will bring much-needed convenience to our side of town, reducing the time residents spend driving across the city for everyday essentials like groceries preferably Trader Joe’s and restaurants.

Furthermore, I appreciate that city staff have thoroughly reviewed the project's traffic and environmental impacts and determined that the developer’s planned infrastructure improvements—such as the new traffic signal at Upland Drive—will safely accommodate the project. This development represents a positive economic investment in our community, creating local jobs and accessible amenities.

Thank you for your time, your service to Roseville, and your consideration of my comments. I urge you to deny the appeal so this project can move forward without further delay.

Sincerely,

Svetlana Brazhnikova

Outlook

SVSP PCL JM-41 & WRSP PCL W-20- Sierra View Shopping Center; File #PL25-0496

From Tammy Carter <tammy.carter60@gmail.com>
Date Mon 10/19/2026 4:33 PM
To Singer, Eric <EJSinger@roseville.ca.us>
Cc Suzanne Carter <slcarter2114@gmail.com>

External: This email was sent by a person from outside your organization. Exercise caution when clicking links, opening attachments, or taking further action.

This is the first time you received an email from this sender (tammy.carter60@gmail.com). Exercise caution when clicking links, opening attachments, or taking further action.

Dear Mr. Singer,

I am writing in concern of the proposed request for a Conditional Use Permit to allow a fueling station and two drive-through restaurants adjacent to residential parcels. The address for the proposed project is 1875 Pleasant Grove Blvd. My home address is 2104 Benton Loop. My backyard backs up to Pleasant Grove Blvd and is directly across the street from this proposed project.

My concern is the noise pollution, light pollution, and air quality issues that will be increased by allowing this project to move forward. Vehicles currently race loudly up and down Pleasant Grove Blvd and when commercial vehicles drive by our home windows shake.

- Can you please share what steps are being taken to mitigate these issues?
- As far as the environmental determination, how can an environmental impact report completed over 16 years ago still apply today?
- Why do we need another gas station at this location? There is a gas station directly across the street from the proposed location.
- Why do we need 2 fast food drive-through restaurants in a residential neighborhood?

I appreciate your time and consideration in addressing and answering these questions and concerns.

Kind Regards,

Tammy Carter
2104 Benton Loop
Roseville, CA
916-969-8787

Outlook

Fwd: Sierra View Shopping Center-objection

From Patti Catalano <pcat624@gmail.com>
Date Mon 9/21/2026 9:23 AM
To Singer, Eric <EJSinger@roseville.ca.us>

External: This email was sent by a person from outside your organization. Exercise caution when clicking links, opening attachments, or taking further action.

We recently received the notification in the mail in regards to the August 27th approval (no surprise) and the scheduled hearing for the consideration of an appeal. Our concerns remain and would like to add our original email to the responses you are now gathering for the hearing scheduled for October 7th. Please seriously consider repealing this prior approval!
Thank you.
~David and Patti Catalano

Begin forwarded message:

From: Patti Catalano <pcat624@gmail.com>
Date: August 10, 2026 at 4:12:28 PM PDT
To: ejsinger@roseville.ca.us
Subject: Fwd: Sierra View Shopping Center-objection

From: Patti Catalano <pcat624@gmail.com>
Date: August 10, 2026 at 4:10:53 PM PDT
To: planningcommission@roseville.ca.gov
Subject: Sierra View Shopping Center-objection

Please accept this email as our formal objection to the proposed plaza development.

We live in Del Webb Westpark, and our property backs up to Pleasant Grove Boulevard. We understood and accepted the traffic associated with Pleasant Grove when we purchased

our home. However, what we did not anticipate was the extremely dense concentration of commercial development that has occurred between Upland Drive and Fiddyment Road.

All summer, we have endured significant dust, dirt, construction equipment noise, and constant truck traffic. Now, we are facing the prospect of enduring these conditions again next year, directly behind our homes.

With Safeway, Costco, and the new gas station already located on the south side of Baseline Road, is additional commercial development really necessary in this relatively small area?

The proposed center will bring even more traffic, delivery trucks—including the possibility of late-night truck activity—additional lighting, noise, and increased air pollution directly into an area surrounded by residential neighborhoods. Our quality of life is already being affected, and this additional development will only intensify those impacts. Increased noise, light, and air pollution are particularly concerning, as is the potential impact that a high-traffic commercial center could have on surrounding property values.

We welcome Costco, Target, Home Depot, and other commercial development along Baseline Road. However, we believe this particular center is unnecessary and poorly located at an already extremely busy intersection.

Traffic at this intersection is already a serious concern. Drivers regularly run red lights after becoming frustrated by long lines of traffic and having to wait through multiple signal cycles. Adding another major commercial center will only increase congestion and create additional safety concerns for both drivers and pedestrians.

We also sincerely hope that the mature trees lining the south side of Pleasant Grove Boulevard will not be impacted, removed, or compromised to accommodate access or egress driveways associated with this development. Those trees

provide an important buffer between the roadway and surrounding neighborhoods and should be preserved.

I sincerely question whether residents' voices truly matter when it comes to development decisions in Roseville. The significant neighborhood opposition to the Grocery Outlet location did not appear to change the City's decision, despite the concerns raised by residents.

Nevertheless, we feel obligated to make our concerns known and formally object to this proposed development. We respectfully ask the City to reconsider whether another commercial center is appropriate or necessary for this already heavily developed and congested area, and to carefully consider the impact this project will have on the surrounding neighborhoods.

Thank you for taking the time to consider the concerns of the residents who will be most directly affected by this project.

David and Patti Catalano
2128 Benton Loop

PLANNING DIVISION
311 Vernon Street, Roseville, CA 95678 (916) 774-5276

APPEAL FORM

Name: Protect Roseville Neighbors, c/o Mark Wolfe, M. R. Wolfe & Associates, PC **Date:** 8/23/2026

Address: 580 California St., Ste. 1200 **City:** San Francisco **Zip Code:** 94104

Phone Numbers: (work/day) 415-369-9400 x. 1 **(home/evening)** _____

(cell) 415-205-1479 **(email)** mrw@mrwolfeassociates.com

Please describe below the action for which this appeal is being filed. (You may attach a separate letter if enough space is not provided.)

August 13, 2026 action by Planning Commission approving Sierra Vista Specific Plan Parcel JM-41 & West Roseville Specific Plan Parcel W-20 – Sierra View Shopping Center, 1875 Pleasant Grove Bl, File # PL25-0496

The specific grounds for appeal are set forth in the attached correspondence from Protect Roseville Neighbors to the Planning Commission, submitted August 12, 2026.

Signed: _____ Date: 8/23/2026

FOR OFFICE USE ONLY. (Date Stamp Below)

Received by: _____

Project Being Appealed: _____

File Number: _____

Approving Body: _____ Approval Date: _____

ATTACHMENT

August 13, 2026

To: Roseville Planning Commission
Cc: City Clerk, City of Roseville
Re: PL25-0496 – Sierra View Shopping Center (Conditional Use Permit, Design Review Permit, Tentative Subdivision Map)

I. Introduction

Protect Roseville Neighborhoods ("PRN") submits these comments on the proposed Sierra View Shopping Center (PL25-0496). PRN is a coalition of residents living adjacent to and within the immediate impact area of the project, including homeowners and townhome residents in the surrounding neighborhoods and future residents of the Sierra Vista Apartments, which is currently under construction on the parcel immediately west and south of the project site.

PRN supports well-planned development in this corridor. However, based on PRN's review of the staff report, the Addendum to the Sierra Vista Specific Plan Environmental Impact Report ("SVSP EIR"), the Site Access Study, the noise study, and the Health Risk Assessment ("HRA"), PRN has identified unresolved traffic, noise, and air quality issues, and land-use compatibility concerns with adjacent residential uses, that warrant further review before the Planning Commission approves this project. For the reasons below, PRN concludes that the City has not demonstrated that an Addendum to the SVSP EIR is the appropriate environmental document for this project, and that further CEQA review is warranted.

II. Summary of Requested Actions

PRN respectfully requests that the Planning Commission:

1. Decline to adopt the Addendum to the SVSP EIR;
2. Direct staff to prepare further environmental review — at minimum a Subsequent or Supplemental EIR — addressing the impacts and unanalyzed conditions identified below;
3. Decline to make the findings necessary to approve the Conditional Use Permit for the three drive-through restaurants and the 24-hour fuel station, on the current record;
4. Decline to make the findings necessary to approve the Design Review Permit, on the current record;
5. Decline to make the findings necessary to approve the Tentative Subdivision Map, on the current record; and
6. Hold the administrative record open to allow adequate public review of the CEQA documents and technical studies.

III. CEQA — The Addendum Is Not the Appropriate Environmental Document

The staff report recommends that the Commission "consider the Addendum to the Sierra Vista Specific Plan Environmental Impact Report." PRN respectfully disagrees that an Addendum is legally sufficient for this project, for the following reasons.

A. Changed circumstances since the SVSP EIR (2010)

The SVSP EIR was certified in 2010. In the years since, the immediate project vicinity has changed substantially. Per the project record: the West Roseville Marketplace center directly across the intersection — anchored by a Safeway grocery store, an eight-pump fuel station, and a drive-through restaurant — is under construction; a CVS drugstore has been built on the intersection's southeast corner; and the 192-unit Sierra Vista Apartments project is approved and under construction immediately adjacent to the site. In addition, published City Council records reflect that a Grocery Outlet grocery store at 1751 Pleasant Grove Boulevard — roughly a quarter mile from the project site — received Planning Commission approval in 2023 and a City Council parcel map approval in February 2026. PRN requests that staff confirm the current entitlement status and case number for that project and incorporate it into the record for purposes of the cumulative impact analysis below.

None of these approvals existed when the SVSP EIR was certified in 2010. PRN believes these represent substantial changes in circumstances under CEQA Guidelines section 15162(a)(2) that are not addressed in the Addendum's discussion of changed conditions.

B. Impacts not evaluated in combination

The Addendum does not appear to evaluate, in combination: a second grocery store within roughly a quarter mile of the existing and approved grocery stores in the area; a second extended-hours fuel station within roughly a quarter mile of the existing Safeway fuel station; three additional drive-through restaurants sited directly adjacent to a 192-unit apartment project and a single-family neighborhood; and the cumulative traffic, noise, and air quality effects of this commercial intensification occurring concurrently with the buildout of adjacent residential parcels. PRN requests that staff confirm whether these combined impacts were analyzed and, if not, that a Subsequent or Supplemental EIR be prepared to do so.

C. The fair argument standard

Under CEQA, if substantial evidence in the record supports a fair argument that the project may have a significant effect on the environment, an EIR is required, notwithstanding contrary evidence in the record. PRN believes the traffic, noise, and air quality issues identified in Sections IV through VI below — several of which are drawn directly from the project's own technical studies — constitute substantial evidence sufficient to trigger this standard.

IV. Traffic and Circulation

The Fehr & Peers Site Access Study (June 2026) ("Access Study") identifies several unresolved issues that PRN believes warrant Commission attention before approval.

A. Driveway spacing does not meet the City's design standard

Per the City's Design and Construction Standards, a driveway permitting a left turn into a six-lane roadway must be located at least 400 feet downstream of an intersection containing left-turn pockets. The Access Study confirms that Driveway 4, on Fiddyment Road, would be located 390 feet downstream — 10 feet short of the standard. (Access Study at 121.) The Access Study notes that relocating the driveway approximately 10 feet to the south would bring it into compliance, and recommends that the City and applicant discuss revising the site plan accordingly. (Id.) PRN requests that the Commission require this correction, or an equivalent fix, as a binding condition of approval rather than approve a site plan that does not meet the applicable design standard as submitted.

B. The project requires off-site roadway improvements not evaluated in the SVSP EIR

To make the project's driveways function, the Access Study recommends: a continuous bus turnout/deceleration lane on Fiddyment Road at Driveway 4 (id. at 122); a 300-foot northbound left-turn ingress lane at Driveway 4 (id.); a right-turn deceleration taper at Driveway 2 (id. at 123); and a right-turn deceleration lane at Driveway 3, extended to merge with the eastbound right-turn lane at the Fiddyment Road/Pleasant Grove Boulevard intersection (id.). These are off-site roadway modifications required to accommodate this specific commercial development. PRN is not aware of evidence that they were evaluated in the SVSP EIR's traffic analysis and requests confirmation from staff on this point.

C. Driveway 2 has inadequate outbound queue storage

The Access Study's own queuing analysis shows that Driveway 2's available outbound storage is 65 feet, while the maximum expected outbound queue is 75 feet — the only driveway of the four where the projected queue exceeds available storage. (Id. at 124, Table 3.) The Access Study acknowledges that when three outbound vehicles are queued at Driveway 2, an inbound left-turning vehicle would be blocked, which could lead to following inbound vehicles queuing back onto Pleasant Grove Boulevard. (Id.) The Access Study recommends widening the driveway and re-striping the lanes as a fix. (Id.) PRN requests that this recommendation be adopted as a binding condition of approval, not merely a recommendation left to future discretion.

D. The drive-through queuing impact of three restaurants has not been analyzed

The Access Study expressly states that it did not analyze vehicle storage requirements for the project's three proposed drive-through restaurants because no specific users are known for those buildings. (Id. at 126.) In other words, the queuing impact of up to three simultaneous

drive-through operations — sited along the project's roadway frontages, near residential uses — remains unanalyzed in the current record. PRN requests that the City require queue analysis based on reasonable worst-case operating assumptions before approval, rather than deferring this analysis until after tenants are identified.

E. Internal circulation issues identified by the project's own traffic engineer

The Access Study's review of internal circulation identifies two unresolved issues. First, the two-way drive aisle behind Building 2 is straight and lacks traffic controls, such that speeding could occur; the current site plan appears to add speed bumps in response, but the Access Study does not confirm this resolves the concern. (Id. at 125.) Second, motorists entering from Driveway 4 who want to reach the fuel pumps must perform a reverse U-turn at the first internal intersection — a movement the Access Study says would likely be challenging for trucks and large SUVs, given the lack of a curb return radius and a receiving lane less than 15 feet wide when a vehicle is fueling. (Id.) The Access Study's own recommendation — to redesign the southerly portion of the fuel station layout — does not appear to have been reflected in the site plan under review. (Id.)

V. Noise

The noise study prepared by Saxelby Acoustics (June 23, 2026) models the project's stationary noise sources — including the trash compactor, rooftop mechanical equipment, and drive-through speaker boxes — and concludes that predicted noise levels at all ten modeled receptors comply with the City's absolute daytime and nighttime noise standards. (Noise Study, Table 11, at 101.) PRN does not dispute that finding on its face.

However, the noise study's separate analysis of increases above existing ambient noise levels — which the City's Municipal Code treats as a significant impact where the increase exceeds 3.0 dBA — expressly excludes Receivers R9 and R10, which represent the Sierra Vista Apartments, the residential use closest to the project's grocery loading dock, trash compactor, and drive-through lanes. The tables carry the note that R9 and R10, representing the "approved but not constructed" apartments, "are not analyzed in this table." (Id., Tables 12–13, at 102.) As a result, the incremental-increase analysis — arguably the more protective of the study's two noise metrics — was not performed for the sensitive receptor located nearest to the project's noisiest fixed sources. PRN requests that this analysis be completed for R9 and R10 prior to approval.

VI. Air Quality and Health Risk Assessment

The HRA prepared by Raney Planning & Management (June 2026) identifies the Sierra Vista Apartments, along with nearby single-family residences and Rex Fortune Elementary School, as sensitive receptors. (HRA at 44.) However, the HRA's health risk modeling identifies the "nearest sensitive receptor" as a single-family residence approximately 500 feet from the proposed fuel station, outside CARB's recommended 300-foot siting buffer. (Id. at 45.) The Sierra Vista Apartments, by contrast, are documented elsewhere in the project record as being as close as

approximately 134 feet from the grocery building and 267 feet from the loading dock and trash compactor — both substantially closer than the 500-foot distance used to identify the maximally exposed receptor. (Project Description at 5.) PRN requests that staff confirm whether the HRA's dispersion modeling accounted for these shorter apartment distances and, if not, that the HRA be revised accordingly.

PRN further notes that the HRA does not appear to include a cumulative analysis of toxic air contaminant exposure from the existing Safeway fuel station in the adjacent West Roseville Marketplace, notwithstanding that both facilities would expose overlapping sensitive receptor populations. PRN requests that a cumulative TAC analysis be added to the record.

VII. Land Use Compatibility

The project site is bordered by the High Density Residential Sierra Vista Apartments to the west and south, and the Low Density Residential neighborhood on Parcel JM-2 farther south, with age-restricted residential across Pleasant Grove Boulevard to the north. The General Plan, Community Design Guidelines, and SVSP direct the City to protect adjacent residential neighborhoods and to require adequate buffering and compatible land-use transitions between commercial and residential uses. Given the unresolved traffic, noise, and queuing issues identified above — several of which involve uses (drive-throughs, a 24-hour fuel station, a loading dock and compactor) sited within roughly 150 to 270 feet of the adjacent apartments — PRN does not believe the current record supports a finding that the project achieves the buffering and compatibility called for in these policies.

VIII. Conditional Use Permit Findings

A Conditional Use Permit is required for the three drive-through restaurants and the fuel station because they are contiguous to residentially designated parcels. (RMC § 19.12.020.) The applicable findings require, among other things, that the use be compatible with surrounding uses and not be detrimental to the public health, safety, or welfare. Given the unanalyzed drive-through queuing impact (Section IV.D), the Driveway 2 queue spillback issue (Section IV.C), and the noise analysis gap for the nearest apartment receptors (Section V), PRN does not believe the record currently supports these findings, and requests that the Commission decline to make them until the issues above are resolved.

IX. Design Review Permit Findings

For related reasons — the unresolved internal circulation issues identified by the project's own traffic engineer (Section IV.E) and the driveway spacing non-compliance (Section IV.A) — PRN does not believe the record currently supports the findings required for the Design Review Permit, including consistency with the Community Design Guidelines and compatibility with adjacent uses.

X. Tentative Subdivision Map

The Tentative Subdivision Map would reconfigure the site's twelve existing parcels into seven parcels, each sized to a building and its parking. Because the driveway spacing issue identified in Section IV.A and the Driveway 2 throat depth issue identified in Section IV.C are functions of this parcel and access configuration, PRN believes the map's supporting findings should not be made until those access design issues are resolved, consistent with the Access Study's own recommendations.

XI. Procedural Request — Hold the Record Open

PRN requests that the Commission hold the administrative record open following this hearing to allow adequate time for public review and comment on the technical studies referenced above, and to allow the specific access, noise, and air quality issues identified in this letter to be addressed in the record before final action is taken. If the staff report and supporting CEQA documents were posted only shortly before this hearing, PRN requests that the specific posting date be reflected in the record in support of this request.

XII. Requested Action

For the reasons above, PRN respectfully requests that the Planning Commission take one of the following actions:

1. Decline to approve the Addendum and the associated entitlements (PL25-0496), and direct staff to prepare further CEQA review addressing the issues identified above; or, at minimum,

2. Continue the hearing and hold the record open to allow the traffic, noise, and air quality issues identified above to be resolved and incorporated into the record before final action.

XIII. Conclusion

PRN appreciates the opportunity to comment on this project and the substantial work reflected in the applicant's technical studies. PRN's review of those studies, however, identified specific unresolved traffic, noise, and air quality issues — several drawn directly from the project's own Access Study, noise study, and HRA — that PRN believes are not yet adequately addressed in the current record. PRN requests that this letter, and the technical citations herein, be included in the official administrative record for this application.

Respectfully submitted,

Protect Roseville Neighborhoods
ProtectRosevilleNeighborhoods@gmail.com
Roseville, CA

REMY | MOOSE | MANLEY LLP

Christina L. Berglund
cberglund@rmmenvirolaw.com

August 12, 2026

Via Email Only
Roseville Planning Commission
City Clerk, City of Roseville
311 Vernon Street
Roseville, CA 95678
PlanningCommission@roseville.ca.gov
CityClerk@roseville.ca.gov

Re: Comments on Roseville Planning Commission, Aug. 13, 2026 – Conditional Use Permit, Design Review Permit, and Tentative Subdivision Map for Sierra View Shopping Center at 1875 Pleasant Grove Blvd. (PL25-0496)

Dear Honorable Planning Commissioners:

We submit these comments on behalf of Warberg Partners, Inc., the applicant for the proposed Sierra View Shopping Center ("Project") located at 1875 Pleasant Grove Boulevard (PL25-0496) in response to the comment letter submitted by Protect Roseville Neighborhoods ("PRN") on August 11, 2026 ("PRN Letter") to explain and reiterate why the Planning Commission's consideration of an Addendum to the Sierra Vista Specific Plan ("SVSP") Environmental Impact Report ("EIR") is appropriate under the California Environmental Quality Act ("CEQA") (Pub. Resources Code, § 211000 et seq.; Cal. Code Regs., tit. 14, § 15000 et seq. ["CEQA Guidelines"]) to support approval of the Project entitlements.

As more fully detailed below, contrary to PRN's comments, substantial evidence indicates that the Project will not result in any new or substantially more severe significant impacts than previously identified in the SVSP EIR. (Pub. Resources Code, § 21166.) Moreover, neither PRN nor others have identified any evidence to the contrary. For these reasons, we urge the Commission to proceed with Staff's recommendation to adopt the Addendum to the SVSP EIR, along with the findings of fact and conditions of approval in support of the Project's Conditional Use Permit ("CUP"), Design Review Permit, and Tentative Subdivision Map.

I. CEQA's Subsequent Environmental Review Standard (Pub. Resources Code, § 21166; CEQA Guidelines, § 15162)

Once an EIR has been certified for a project, as is the case here, CEQA prohibits preparation of a supplemental or subsequent EIR absent one of the following statutorily prescribed circumstances triggering further environmental review:

> (1) Substantial changes are proposed to the project that require major revisions to the EIR due to "new significant environmental effects or a substantial increase in the severity of previously identified significant effects";
>
> (2) Substantial changes occur with respect to the circumstances under which the project is being undertaken that require major revisions to the EIR due to "new significant environmental effects or a substantial increase in the severity of previously identified significant effects"; or
>
> (3) New information of substantial importance, which was not and could not have been known at the time the previous EIR was certified, shows that one or more significant impacts not discussed in the prior EIR will occur or "significant effects previously examined will be substantially more severe."

(CEQA Guidelines, § 15162; Pub. Resources Code, § 21166.) If none of these circumstances exists, but for minor changes or additions to the previously certified EIR are necessary, the "lead agency … *shall* prepare an addendum." (CEQA Guidelines, § 15164, italics added.)

These limitations reflect the Legislature's effort "to balance CEQA's central purpose of promoting consideration of the environmental consequences of public decisions with interests in finality and efficiency." (*Friends of College of San Mateo Gardens v. San Mateo County Community College Dist.* (2016) 1 Cal.5th 937, 949 ("*San Mateo Gardens I*").) "'The purpose behind the requirement of a subsequent or supplemental EIR...is to explore environmental impacts *not* considered in the original environmental document…a change in a project is not an occasion to revisit environmental concerns laid to rest in the original analysis. Only changed circumstances...are at issue.'" (*Id.*, pp. 949–950, italics added, citation omitted.)

Consequently, where the agency is reviewing a project for which an initial EIR has already been prepared, Public Resources Code, section 21166, provides a "statutory presumption *against* additional environmental review." (*San Diego Navy Broadway Complex Coalition v. City of San Diego* (2010) 185 Cal.App.4th 924, 934, italics added; see *Bowman v. City of Petaluma* (1986) 185 Cal.App.3d 1065, 1073–1074 ["section 21166 indicates a quite different intent, namely, to restrict the powers of agencies by prohibiting them from requiring a subsequent or supplemental environmental impact report unless the stated conditions are met"].)

The "addendum process fills a gap in CEQA for projects with a previously certified EIR requiring revisions that do not warrant the preparation of subsequent EIRs." (*Save Our Heritage Organisation v. City of San Diego* (2018) 28 Cal.App.5th 656, 667.) Addenda are thus appropriate "for minor technical changes or additions to a project that do not raise important new issues about the significant effects on the environment." (*IBC Business Owners for Sensible Development v. City of Irvine* (2023) 88 Cal.App.5th 100, 119; see *Ventura Foothill Neighbors v. County of Ventura* (2014) 232 Cal.App.4th 429, 435 ["When there are changes in a project after the certification of a[n] [EIR], the agency can prepare an Addendum to the [EIR] if the changes do not substantially modify the analysis in the original report. The Addendum is acceptable, rather than a new or Supplemental EIR, when there are only minor technical changes or additions which do not raise important new issues about the significant effects on the environment" (citation omitted)].)

Nor does every increase in any environmental effect require a subsequent EIR. Even where a project change could otherwise substantially increase the severity of an impact, an addendum remains appropriate if mitigation reduces the impact to a less-than-significant level. (See *River Valley Preservation Project v. Metropolitan Transit Board* (1995) 37 Cal.App.4th 154, 168.) Put differently, an applicant's agreement to adopt additional mitigation measures preserves the project's eligibility for an addendum. (See, e.g., *Citizens Against Airport Pollution v. City of San Jose* (2014) 227 Cal.App.4th 788, 809–811 (*CAAP*) [upholding addendum that included additional mitigation measures to offset habitat loss]; *Snarled Traffic Obstructs Progress v City & County of San Francisco* (1999) 74 Cal.App.4th 793, 802 [rejecting claim that project changes resulted in significant impacts, as changes to project had mitigated those impacts].)

The law is crystal clear that mere controversy over a proposed project is not enough to require a private project applicant to bear the expense of an EIR.

(*Bowman*, *supra*, 185 Cal.App.3d at pp. 1080–1081.) Actual *substantial* evidence of a potentially *significant* environmental effect is required. "The existence of public controversy over the environmental effects of a project shall *not* require preparation of [a subsequent or supplemental EIR] if there is no substantial evidence in light of the whole record before the lead agency that the project" would have new or substantially more severe significant effects than previously analyzed. (Pub. Resources Code, § 21082.2, subd. (b), italics added.)

II. Analysis and Responses to PRN Letter

Substantial evidence supports the City's use of and reliance on the Addendum to the SVSP EIR because none of the circumstances triggering subsequent or supplemental environmental review exist here. (Pub. Resources Code, § 21166; CEQA Guidelines, §§ 15162, 15164; see Aug. 13, 2026 Staff Report [Staff Report], Exh. A [Addendum].)

A. The Substantial Evidence Standard Governs.

PRN incorrectly contends the fair argument standard applies to the City's determination regarding whether a supplemental/subsequent EIR is required. (PRN Letter, p. 2.) The substantial evidence standard governs: (i) the City's determination that supplemental environmental review is not required; and (ii) the City's decision to prepare, use, and rely on the Addendum. (See *San Mateo Gardens I*, *supra*, 1 Cal.5th at pp. 957–959; *Citizens for Responsible Equitable Environmental Development v. City of San Diego Redevelopment Agency* (2005) 134 Cal.App.4th 598, 610 ("*CREED*") ["the fair argument standard does not apply to judicial review of an agency's determination that a project is within the scope of a previously completed EIR"].)

Under this standard, the City's decision to rely on the Addendum must be upheld so long as its determination that the Project will not have additional or more severe environmental impacts is supported by substantial evidence, even if there is evidence to the contrary. (*CAAP*, *supra*, 227 Cal.App.4th at pp. 797–798, 804 [when "an agency has already prepared an EIR, its decision not to prepare [a] [supplemental/subsequent] EIR for a later project is reviewed under the deferential substantial evidence standard"]; *Bowman*, *supra*, 185 Cal.App.3d at p. 1081 ["The question, however, is not whether an addendum was authorized but whether a supplemental EIR was required"]; see CEQA Guidelines, § 15384, subd. (a).)

The City's reliance on the SVSP EIR also warrants deference. In particular, there is a deferential presumption that the City has already conducted in-depth environmental review and imposed sufficiently stringent mitigation requirements, such that little benefit would result from a second—expensive and time-consuming—round of review. (See *San Mateo Gardens I*, *supra*, 1 Cal.5th at pp. 949–950; see also *CAAP*, *supra*, 227 Cal.App.4th at pp. 797–798, 805 ["This deferential standard is a reflection of the fact that in-depth review has already occurred. . . .[A]fter a project has been subjected to environmental review, the statutory presumption flips in favor of the developer and against further review"]; *CREED*, *supra*, 134 Cal.App.4th at p. 611 [same].)

In addition to the deference owed to the City's decision, the operative provisions of CEQA and its Guidelines make the use of an addendum *mandatory* when neither changes to the proposed Project nor changed circumstances result in new or substantially more severe significant effects. (CEQA Guidelines, § 15164, subd. (a), italics added ["The lead agency… *shall* prepare an addendum to a previously certified EIR if some changes or additions are necessary but none of the conditions" triggering supplemental/subsequent review have occurred]; see *Friends of College of San Mateo Gardens v. San Mateo County Community College Dist.* (2017) 11 Cal.App.5th 596, 604–606 ("*San Mateo Gardens II*") [if the original environmental document retains some informational value such that no subsequent EIR is required, the agency shall determine whether to prepare an addendum or other appropriate document].) Substantial evidence supports the City's decision to proceed with preparing an Addendum for the Project because there are no changed circumstances or evidence that the Project may have substantially more significant unmitigated impacts.

B. No Changed Circumstances Have Occurred Since the City Certified the SVSP EIR in 2010.

There have been no changed circumstances since the City prepared and certified the SVSP EIR in 2010. (Cf., PRN Letter, p. 2.) The SVSP EIR analyzed the development of the entire SVSP area, which includes 2,064 acres slated for a mixture of uses. Among those, the SVSP designates parcel JM-41—on which the Project will be developed—for "Community Commercial" land uses, including large-format commercial uses, such as a 250,000-square-foot commercial development. (SVSP, Fig. B-31; Addendum, pp. 3–4.) The Project's proposed commercial shopping center, which will feature approximately 58,210 square feet of retail and restaurant

uses, falls squarely within the scope of the SVSP's contemplated development scheme. (Staff Report, p. 2; Addendum, pp. 6–7.)

The City also accounted for buildout of sites adjacent to the Project. For instance, the City approved the North Roseville Specific Plan ("NRSP") and related EIR in 1997, which analyzed impacts associated with forecasted development of residential, commercial, open space, parks, and public facility uses on 3,162 neighboring acres. (Addendum, p. 4.) Among those anticipated uses is the Grocery Outlet store at 1751 Pleasant Grove Road, which the City approved and deemed categorically exempt from CEQA as an "urban infill" development in 2023. (Cf. PRN Letter, p. 2.)

Taken together, all ongoing development surrounding the Project site, along with all development proposed by the Project itself, was contemplated by the SVSP and thus analyzed in and mitigated for in the corresponding SVSP EIR. Contrary to PRN's urging, these developments do not change existing or future development conditions and assumptions; rather, they facilitate the precise development scheme that the City envisioned when it adopted the SVSP in 2010. For these reasons, substantial evidence supports the City's decision to rely on an Addendum for the Project because there are no "changed circumstances" that would warrant the preparation of a subsequent or supplemental EIR. (Pub. Resources Code, § 21166.)

C. The SVSP EIR Analyzed Cumulative Impacts of Anticipated Development in the Plan Area, Including the Project Site.

PRN also wrongly claims that the Addendum fails to evaluate the cumulative impacts associated with the Project's proposed grocery store, fueling station, and drive-through restaurants, given their proximity to other analogous uses. (PRN Letter, p. 2.) But the SVSP EIR previously evaluated the cumulative effects of the proposed development's type and intensity. The SVSP contemplated a mix of commercial, residential, and mixed uses within the plan area and evaluated that development together with reasonably foreseeable development in surrounding areas. (See Addendum, pp. 5, 8.) To account for this, the SVSP EIR evaluated cumulative impacts associated with development in neighboring plan areas, such as the NRSP, West Roseville Specific Plan, the Downtown, the Riverside, the Creekview, the Placer Ranch, the Regional University, the Riolo Vineyards, the Curry Creek, the Sutter Pointe, and the Elverta Specific Plans. (See generally SVSP

EIR, § 5.7, pp. 5-9–5-176 [Cumulative Impacts]; see, e.g., SVSP EIR, pp. 5-6, 5-10–5-18.)

The SVSP EIR assumed that approximately 2,226.80 thousand square feet of commercial uses, 6,053 single-family dwelling units (DUs), and 2,816 multifamily DUs could be built out within the entire SVSP. (SVSP EIR, p. 5-11 [Table 5.7-1].) Based on those buildout assumptions, the SVSP EIR analyzed the cumulative traffic, noise, and air quality effects associated with concurrent buildout of these commercial and residential uses. (See SVSP EIR, pp. 5-18–5-128 [traffic], 5-128–5-131 [air quality], 5-131–134 [noise].) Contrary to PRN's assertion, the cumulative effects of commercial uses such as the Project, together with nearby commercial and residential development, including the Safeway fuel station and Sierra Vista Apartments, were previously contemplated and analyzed in the SVSP EIR. (Cf. *ibid.* with PRN Letter, p. 2.)

Here, the Project involves approximately 58,000 square feet of commercial development and would be developed at only approximately one-quarter of the intensity previously analyzed for the site in the SVSP EIR. (Addendum pp. 8–9.) That comparison is itself conservative because the Project total includes Building 1 and associated improvements that were separately evaluated in a prior mitigated negative declaration. (*Ibid.*) Thus, substantial evidence supports the conclusion that the Project would not result in new or substantially more severe environmental effects because it represents less intensive development than previously analyzed. (*Ibid.*)

Accordingly, PRN's assertion that the Addendum "does not appear to evaluate" the cumulative impacts of the Project and surrounding development lacks merit. (PRN Letter, p. 2.) The relevant cumulative impacts were evaluated in the SVSP EIR, and the Addendum appropriately determined that the Project falls within the scope and intensity of development contemplated by that analysis. No subsequent or supplemental EIR is therefore required—(PRN Letter, p. 2; *Bowman*, *supra*, 185 Cal.App.3d at pp. 1079–1081 [supplemental/subsequent EIR not required if project impacts do not differ significantly from those described in prior EIR]; *Citizens' Committee to Complete the Refuge v. City of Newark* (2021) 74 Cal.App.5th 460, 471–472 [subdivision's development of some but not all of the developable area previously analyzed in prior EIR suggested project would have less of an environmental impact than initially anticipated].)

D. Traffic, Access, and Circulation Improvements are not CEQA Issues.

PRN asserts the Access Study identifies "several unresolved" traffic and circulation issues that were not previously analyzed in the SVSP EIR. (PRN Comment Letter, p. 3.) For instance, PRN contends the off-site roadway improvements to facilitate the Project's driveways were not evaluated in the SVSP EIR's traffic analysis and therefore must be further considered. (*Ibid.*) Access, traffic, and circulation impacts and related improvements, however, are not cognizable impacts under CEQA. (CEQA Guidelines, § 15064.3.)

The Legislature amended CEQA in 2018 by passing Senate Bill 743. (Addendum, p. 11.) The bill added section 15064.3 to the CEQA Guidelines to provide that "vehicle miles traveled" (VMT)—i.e., the amount and distance of automobile travel attributable to a project—would now be the most appropriate measure for analyzing transportation impacts. (*Ibid.*) This requirement, however, did not apply retroactively, and thus would not affect the SVSP EIR's traffic analysis. (*Ibid.*; see *Citizens for Positive Growth & Preservation v. City of Sacramento* (2019) 43 Cal.App.5th 609, 624–626.)

Separately, the City later conducted a VMT analysis as part of the EIR it prepared for its General Plan Update ("GPU"). (Addendum, p. 12) The GPU accounted for the full scope of commercial development on the Project Site. (*Ibid.*) The GPU EIR's corresponding VMT analysis explained that projects consistent with the General Plan do not require further VMT analysis, particularly when it can be demonstrated that a project would generate VMT equivalent to or less than that assumed in the GPU EIR. (*Ibid.*)

Here, because the GPU EIR anticipated large commercial development on the Project Site, and because the Project's proposed scope does not exceed what was anticipated with buildout of the SVSP or analyzed in the GPU EIR, substantial evidence supports the City's conclusion that the Project is consistent with the GPU EIR's VMT analysis, thus obviating the need for any additional analysis of the Project's proposed roadway improvements. (*Ibid.*; *id.*, pp. 40–42; see *Bowman*, *supra*, 185 Cal.App.3d at pp. 1078–1081 [project's street reconfiguration proposed years after initial EIR was certified modified traffic flow but not overall impact of traffic projected in EIR, therefore a subsequent/supplemental EIR was not

warranted]; accord *A Local & Regional Monitor v. City of Los Angeles* (1993) 12 Cal.App.4th 1773, 1803 ("*ALARM*").)

E. The Project Will Not Have New or Substantially More Severe Noise Impacts.

PRN misleadingly suggests the Project may have significant noise impacts to sensitive receptors because the noise study prepared by Saxelby Acoustics (Noise Study) did not account for Receivers R9 and R10 at the Sierra Vista Apartments. (PRN Letter, p. 4.) PRN misunderstands the purpose and application of the City's noise thresholds. As the Noise Study explains, a 3 dB increase in ambient noise marks the threshold at which changes in the existing noise environment may become perceptible to people already experiencing it. (Noise Study, p. 5.) The threshold therefore applies to increases in ambient noise experienced by existing sensitive receptors.

There are no existing sensitive receptors at R9 and R10. The Sierra Vista Apartments are under construction, so no residents currently experience the ambient noise at those locations. (PRN Letter, p. 4; Noise Study, pp. 6, 21–22.) Accordingly, the Noise Study did not apply the 3 dB ambient-noise increase threshold to R9 and R10, as expressly explained in the footnotes to Tables 12 and 13. This approach is consistent with CEQA's general use of existing physical conditions as the environmental baseline. (CEQA Guidelines, § 15125; see *South of Market Community Action Network v. City and County of San Francisco* (2019) 33 Cal.App.5th 321, 337–338.)

Substantial evidence establishes that the Project will not have new or substantially more severe noise impacts. The Noise Study explains that the Project will construct a six-foot soundwall on the property line between the future multifamily development and the Project site. (Staff Report, pp. 5–6; Addendum, p. 35; Noise Study, pp. 6, 14.) With this wall, along with the Project's compliance with SVSP EIR noise mitigation measures, operational noise will not exceed the allowable thresholds established in the City noise ordinance during daytime or nighttime hours, including at nearby sensitive receptors. (Addendum, p. 35.) In fact, the increases in noise are "small enough that they are likely to be imperceptible to the human ear…" (*Ibid.*) Accordingly, the Project will not have new or substantially more severe noise impacts that require preparation of a supplemental/subsequent EIR. (See *Bowman*, *supra*, 185 Cal.App.3d at pp. 1079–1080.)

F. The Project Will Not Have New or Substantially More Severe Air Quality Impacts.

PRN questions the sufficiency of the Addendum's Health Risk Assessment ("HRA") by asking the City to conduct additional air quality analyses. (PRN Letter, pp. 4–5.) Per the SVSP EIR, the City was required to prepare an HRA to assess the impacts of the Project's proposed fueling station, located at Building 5. (Staff Report, p. 5; Addendum, p. 17; SVSP EIR, pp. 4.4-39–4.4-40, 4.4-55–4.4-56.) The analysis found that the closest *existing* sensitive receptor to Building 5 was located approximately 500 feet across Pleasant Grove Boulevard to the north. (*Ibid.*) Other sensitive receptors were located approximately 2,000 feet from the Project Site. (*Ibid.*) By virtue of this, the HRA concluded that the increased cancer risk, non-cancer chronic hazard indices, and acute hazard indices for exposed residents, workers, and non-gas-station workers would be below the significance thresholds. (*Ibid.*) To this end, long-term operation of the fueling station would not result in significant impacts to sensitive receptors through substantial toxic air contaminant (TAC) concentrations. (*Ibid.*)

PRN contends that the HRA should have analyzed the Project's operational impacts to receptors at the yet-to-be-developed Sierra Vista Apartments, citing potential risks due to the proximity of the Project's loading dock and trash compactor. (PRN Letter, pp. 4–5.) The SVSP EIR did not identify trash compactors and grocery store loading docks as significant sources of potential TAC emissions that would necessitate analysis in an HRA. (See SVSP EIR, pp. 4.4-55–4.4-56.) This is because neither the California Air Resources Board (CARB) nor the Placer County Air Pollution Control District identifies grocery stores or trash compactors as considerable sources of TAC emissions. (HRA, p. 5.) As such, the HRA was not required to analyze potential emissions from these sources.

Finally, PRN requests that the City prepare a cumulative TAC analysis to assess TAC exposure to future Sierra Vista Apartment residents. No such analysis is necessary. First, as noted above, grocery store uses are not significant sources of TAC emissions that must be analyzed in an HRA. Instead, consistent with the SVSP EIR, only the Project's fueling station necessitated preparation of the HRA. Second, while the Sierra Vista Apartments will be located next to the *overall* Project Site, they will be considerably separated from the fueling station at Building 5 by virtue of several intervening buildings. (See HRA, p. 4 [Site Plan].) Absent evidence to the contrary, PRN presents no substantial evidence of a new or substantially

more severe impact that would require further analysis. Finally, the SVSP EIR explained that airborne TAC emissions were addressed in its cumulative air quality analysis. (SVSP EIR, p. 5-138.) The SVSP EIR explained that the full buildout of the SVSP—of which the Project is a part—would not cumulatively result in a considerable impact on airborne TAC emissions, thus resulting in a less than significant impact. (*Ibid.*) As such, the HRA and the Addendum appropriately concluded that cumulative air quality and TAC impacts from Project operations would not be substantially more severe to require preparation of a supplemental/subsequent EIR. (Addendum, p. 17; Staff Report, p. 5.)

III. Conclusion

For these foregoing reasons, the Addendum is the appropriate approach to CEQA compliance for the City's review and consideration of the Project. Contrary to PRN's contentions, none of the conditions triggering subsequent or supplemental environmental review exist here. Specifically, the Project will not result in new or significantly more severe environmental impacts than those previously considered and mitigated in the SVSP EIR. In the absence of these conditions, CEQA requires the City to prepare an addendum. On behalf of our client, we thus urge the Commission to proceed with accepting staff's recommendation to consider the Addendum and adopt the findings of fact and conditions of approval in support of the Project's CUP, Design Review Permit, and Tentative Subdivision Map.

* * *

We appreciate the Commission's consideration of the above analysis and urge the Commission to adopt staff's recommendation. Thank you for the opportunity to comment and for your consideration of the matters outlined in this letter.

Very truly yours,

Christina L. Berglund

With Courtesy Copies To:

- **Eric Singer** – EJSinger@roseville.ca.gov
- **Derek Ogden** – DOgden@roseville.ca.us
- **Lauren Hocker** – LHocker@roseville.ca.us
- **Greg Bitter** – GBitter@roseville.ca.gov

August 13, 2026

To: Roseville Planning Commission
Cc: City Clerk, City of Roseville
Re: PL25-0496 – Sierra View Shopping Center (Conditional Use Permit, Design Review Permit, Tentative Subdivision Map)

I. Introduction

Protect Roseville Neighborhoods ("PRN") submits these comments on the proposed Sierra View Shopping Center (PL25-0496). PRN is a coalition of residents living adjacent to and within the immediate impact area of the project, including homeowners and townhome residents in the surrounding neighborhoods and future residents of the Sierra Vista Apartments, which is currently under construction on the parcel immediately west and south of the project site.

PRN supports well-planned development in this corridor. However, based on PRN's review of the staff report, the Addendum to the Sierra Vista Specific Plan Environmental Impact Report ("SVSP EIR"), the Site Access Study, the noise study, and the Health Risk Assessment ("HRA"), PRN has identified unresolved traffic, noise, and air quality issues, and land-use compatibility concerns with adjacent residential uses, that warrant further review before the Planning Commission approves this project. For the reasons below, PRN concludes that the City has not demonstrated that an Addendum to the SVSP EIR is the appropriate environmental document for this project, and that further CEQA review is warranted.

II. Summary of Requested Actions

PRN respectfully requests that the Planning Commission:

1. Decline to adopt the Addendum to the SVSP EIR;
2. Direct staff to prepare further environmental review — at minimum a Subsequent or Supplemental EIR — addressing the impacts and unanalyzed conditions identified below;
3. Decline to make the findings necessary to approve the Conditional Use Permit for the three drive-through restaurants and the 24-hour fuel station, on the current record;
4. Decline to make the findings necessary to approve the Design Review Permit, on the current record;
5. Decline to make the findings necessary to approve the Tentative Subdivision Map, on the current record; and
6. Hold the administrative record open to allow adequate public review of the CEQA documents and technical studies.

III. CEQA — The Addendum Is Not the Appropriate Environmental Document

The staff report recommends that the Commission "consider the Addendum to the Sierra Vista Specific Plan Environmental Impact Report." PRN respectfully disagrees that an Addendum is legally sufficient for this project, for the following reasons.

A. Changed circumstances since the SVSP EIR (2010)

The SVSP EIR was certified in 2010. In the years since, the immediate project vicinity has changed substantially. Per the project record: the West Roseville Marketplace center directly across the intersection — anchored by a Safeway grocery store, an eight-pump fuel station, and a drive-through restaurant — is under construction; a CVS drugstore has been built on the intersection's southeast corner; and the 192-unit Sierra Vista Apartments project is approved and under construction immediately adjacent to the site. In addition, published City Council records reflect that a Grocery Outlet grocery store at 1751 Pleasant Grove Boulevard — roughly a quarter mile from the project site — received Planning Commission approval in 2023 and a City Council parcel map approval in February 2026. PRN requests that staff confirm the current entitlement status and case number for that project and incorporate it into the record for purposes of the cumulative impact analysis below.

None of these approvals existed when the SVSP EIR was certified in 2010. PRN believes these represent substantial changes in circumstances under CEQA Guidelines section 15162(a)(2) that are not addressed in the Addendum's discussion of changed conditions.

B. Impacts not evaluated in combination

The Addendum does not appear to evaluate, in combination: a second grocery store within roughly a quarter mile of the existing and approved grocery stores in the area; a second extended-hours fuel station within roughly a quarter mile of the existing Safeway fuel station; three additional drive-through restaurants sited directly adjacent to a 192-unit apartment project and a single-family neighborhood; and the cumulative traffic, noise, and air quality effects of this commercial intensification occurring concurrently with the buildout of adjacent residential parcels. PRN requests that staff confirm whether these combined impacts were analyzed and, if not, that a Subsequent or Supplemental EIR be prepared to do so.

C. The fair argument standard

Under CEQA, if substantial evidence in the record supports a fair argument that the project may have a significant effect on the environment, an EIR is required, notwithstanding contrary evidence in the record. PRN believes the traffic, noise, and air quality issues identified in Sections IV through VI below — several of which are drawn directly from the project's own technical studies — constitute substantial evidence sufficient to trigger this standard.

IV. Traffic and Circulation

The Fehr & Peers Site Access Study (June 2026) ("Access Study") identifies several unresolved issues that PRN believes warrant Commission attention before approval.

A. Driveway spacing does not meet the City's design standard

Per the City's Design and Construction Standards, a driveway permitting a left turn into a six-lane roadway must be located at least 400 feet downstream of an intersection containing left-turn pockets. The Access Study confirms that Driveway 4, on Fiddyment Road, would be located 390 feet downstream — 10 feet short of the standard. (Access Study at 121.) The Access Study notes that relocating the driveway approximately 10 feet to the south would bring it into compliance, and recommends that the City and applicant discuss revising the site plan accordingly. (Id.) PRN requests that the Commission require this correction, or an equivalent fix, as a binding condition of approval rather than approve a site plan that does not meet the applicable design standard as submitted.

B. The project requires off-site roadway improvements not evaluated in the SVSP EIR

To make the project's driveways function, the Access Study recommends: a continuous bus turnout/deceleration lane on Fiddyment Road at Driveway 4 (id. at 122); a 300-foot northbound left-turn ingress lane at Driveway 4 (id.); a right-turn deceleration taper at Driveway 2 (id. at 123); and a right-turn deceleration lane at Driveway 3, extended to merge with the eastbound right-turn lane at the Fiddyment Road/Pleasant Grove Boulevard intersection (id.). These are off-site roadway modifications required to accommodate this specific commercial development. PRN is not aware of evidence that they were evaluated in the SVSP EIR's traffic analysis and requests confirmation from staff on this point.

C. Driveway 2 has inadequate outbound queue storage

The Access Study's own queuing analysis shows that Driveway 2's available outbound storage is 65 feet, while the maximum expected outbound queue is 75 feet — the only driveway of the four where the projected queue exceeds available storage. (Id. at 124, Table 3.) The Access Study acknowledges that when three outbound vehicles are queued at Driveway 2, an inbound left-turning vehicle would be blocked, which could lead to following inbound vehicles queuing back onto Pleasant Grove Boulevard. (Id.) The Access Study recommends widening the driveway and re-striping the lanes as a fix. (Id.) PRN requests that this recommendation be adopted as a binding condition of approval, not merely a recommendation left to future discretion.

D. The drive-through queuing impact of three restaurants has not been analyzed

The Access Study expressly states that it did not analyze vehicle storage requirements for the project's three proposed drive-through restaurants because no specific users are known for those buildings. (Id. at 126.) In other words, the queuing impact of up to three simultaneous

drive-through operations — sited along the project's roadway frontages, near residential uses — remains unanalyzed in the current record. PRN requests that the City require queue analysis based on reasonable worst-case operating assumptions before approval, rather than deferring this analysis until after tenants are identified.

E. Internal circulation issues identified by the project's own traffic engineer

The Access Study's review of internal circulation identifies two unresolved issues. First, the two-way drive aisle behind Building 2 is straight and lacks traffic controls, such that speeding could occur; the current site plan appears to add speed bumps in response, but the Access Study does not confirm this resolves the concern. (Id. at 125.) Second, motorists entering from Driveway 4 who want to reach the fuel pumps must perform a reverse U-turn at the first internal intersection — a movement the Access Study says would likely be challenging for trucks and large SUVs, given the lack of a curb return radius and a receiving lane less than 15 feet wide when a vehicle is fueling. (Id.) The Access Study's own recommendation — to redesign the southerly portion of the fuel station layout — does not appear to have been reflected in the site plan under review. (Id.)

V. Noise

The noise study prepared by Saxelby Acoustics (June 23, 2026) models the project's stationary noise sources — including the trash compactor, rooftop mechanical equipment, and drive-through speaker boxes — and concludes that predicted noise levels at all ten modeled receptors comply with the City's absolute daytime and nighttime noise standards. (Noise Study, Table 11, at 101.) PRN does not dispute that finding on its face.

However, the noise study's separate analysis of increases above existing ambient noise levels — which the City's Municipal Code treats as a significant impact where the increase exceeds 3.0 dBA — expressly excludes Receivers R9 and R10, which represent the Sierra Vista Apartments, the residential use closest to the project's grocery loading dock, trash compactor, and drive-through lanes. The tables carry the note that R9 and R10, representing the "approved but not constructed" apartments, "are not analyzed in this table." (Id., Tables 12–13, at 102.) As a result, the incremental-increase analysis — arguably the more protective of the study's two noise metrics — was not performed for the sensitive receptor located nearest to the project's noisiest fixed sources. PRN requests that this analysis be completed for R9 and R10 prior to approval.

VI. Air Quality and Health Risk Assessment

The HRA prepared by Raney Planning & Management (June 2026) identifies the Sierra Vista Apartments, along with nearby single-family residences and Rex Fortune Elementary School, as sensitive receptors. (HRA at 44.) However, the HRA's health risk modeling identifies the "nearest sensitive receptor" as a single-family residence approximately 500 feet from the proposed fuel station, outside CARB's recommended 300-foot siting buffer. (Id. at 45.) The Sierra Vista Apartments, by contrast, are documented elsewhere in the project record as being as close as

approximately 134 feet from the grocery building and 267 feet from the loading dock and trash compactor — both substantially closer than the 500-foot distance used to identify the maximally exposed receptor. (Project Description at 5.) PRN requests that staff confirm whether the HRA's dispersion modeling accounted for these shorter apartment distances and, if not, that the HRA be revised accordingly.

PRN further notes that the HRA does not appear to include a cumulative analysis of toxic air contaminant exposure from the existing Safeway fuel station in the adjacent West Roseville Marketplace, notwithstanding that both facilities would expose overlapping sensitive receptor populations. PRN requests that a cumulative TAC analysis be added to the record.

VII. Land Use Compatibility

The project site is bordered by the High Density Residential Sierra Vista Apartments to the west and south, and the Low Density Residential neighborhood on Parcel JM-2 farther south, with age-restricted residential across Pleasant Grove Boulevard to the north. The General Plan, Community Design Guidelines, and SVSP direct the City to protect adjacent residential neighborhoods and to require adequate buffering and compatible land-use transitions between commercial and residential uses. Given the unresolved traffic, noise, and queuing issues identified above — several of which involve uses (drive-throughs, a 24-hour fuel station, a loading dock and compactor) sited within roughly 150 to 270 feet of the adjacent apartments — PRN does not believe the current record supports a finding that the project achieves the buffering and compatibility called for in these policies.

VIII. Conditional Use Permit Findings

A Conditional Use Permit is required for the three drive-through restaurants and the fuel station because they are contiguous to residentially designated parcels. (RMC § 19.12.020.) The applicable findings require, among other things, that the use be compatible with surrounding uses and not be detrimental to the public health, safety, or welfare. Given the unanalyzed drive-through queuing impact (Section IV.D), the Driveway 2 queue spillback issue (Section IV.C), and the noise analysis gap for the nearest apartment receptors (Section V), PRN does not believe the record currently supports these findings, and requests that the Commission decline to make them until the issues above are resolved.

IX. Design Review Permit Findings

For related reasons — the unresolved internal circulation issues identified by the project's own traffic engineer (Section IV.E) and the driveway spacing non-compliance (Section IV.A) — PRN does not believe the record currently supports the findings required for the Design Review Permit, including consistency with the Community Design Guidelines and compatibility with adjacent uses.

X. Tentative Subdivision Map

The Tentative Subdivision Map would reconfigure the site's twelve existing parcels into seven parcels, each sized to a building and its parking. Because the driveway spacing issue identified in Section IV.A and the Driveway 2 throat depth issue identified in Section IV.C are functions of this parcel and access configuration, PRN believes the map's supporting findings should not be made until those access design issues are resolved, consistent with the Access Study's own recommendations.

XI. Procedural Request — Hold the Record Open

PRN requests that the Commission hold the administrative record open following this hearing to allow adequate time for public review and comment on the technical studies referenced above, and to allow the specific access, noise, and air quality issues identified in this letter to be addressed in the record before final action is taken. If the staff report and supporting CEQA documents were posted only shortly before this hearing, PRN requests that the specific posting date be reflected in the record in support of this request.

XII. Requested Action

For the reasons above, PRN respectfully requests that the Planning Commission take one of the following actions:

1. Decline to approve the Addendum and the associated entitlements (PL25-0496), and direct staff to prepare further CEQA review addressing the issues identified above; or, at minimum,

2. Continue the hearing and hold the record open to allow the traffic, noise, and air quality issues identified above to be resolved and incorporated into the record before final action.

XIII. Conclusion

PRN appreciates the opportunity to comment on this project and the substantial work reflected in the applicant's technical studies. PRN's review of those studies, however, identified specific unresolved traffic, noise, and air quality issues — several drawn directly from the project's own Access Study, noise study, and HRA — that PRN believes are not yet adequately addressed in the current record. PRN requests that this letter, and the technical citations herein, be included in the official administrative record for this application.

Respectfully submitted,

Protect Roseville Neighborhoods
ProtectRosevilleNeighborhoods@gmail.com
Roseville, CA

From: Stephanie Brown
To: Planning Commission
Cc: Hocker, Lauren
Subject: Comment on PL25-0496 – Sierra View Shopping Center
Date: Tuesday, August 11, 2026 7:53:14 PM

Dear Planning Commission Members,

My name is Stephanie Brown, and I live near the proposed Sierra View Shopping Center project. I am writing to share my concerns about several impacts this project may have on our neighborhood.

Because of how close I am to the site, I am especially worried about:

Traffic and safety: The Pleasant Grove/Fiddyment intersection is already heavily congested during peak hours. Adding a grocery store, a fuel station, and three drive-through restaurants will significantly increase traffic and turning movements. The City's own access study shows that one of the driveways does not meet spacing standards and that queue spillback could occur onto Pleasant Grove. As a nearby resident/worker, this directly affects my daily travel and safety.

Noise: The project includes a loading dock, trash compactor, and multiple drive-through lanes located close to the new Sierra Vista Apartments and nearby homes. The noise study did not evaluate the increase in noise levels at the closest apartment buildings. This is concerning for anyone living nearby, especially during early morning deliveries or late-night operations.

Air quality: There will be a second fuel station within a short distance of homes and apartments. The health risk assessment did not appear to evaluate the closer apartment buildings as the nearest sensitive receptors, even though they are much closer than the single-family homes used in the analysis. As someone who lives/works near the site, I am concerned about exposure to emissions from two fuel stations and multiple drive-through lanes.

Cumulative impacts: With the Safeway center, CVS, the approved Grocery Outlet, and now this project, the area is experiencing a rapid increase in commercial intensity. I ask that the City fully evaluate how all of these projects together will affect traffic, noise, and air quality for the surrounding neighborhoods.

For these reasons, I respectfully request that the Commission **not approve the project at this time** and instead require additional environmental review to fully address these issues. Thank you for considering my comments.

Sincerely,

Stephanie Brown

132 Laysan Teal Ct, Roseville, CA 95747
444auntiesef@gmail.com

From: Patti Catalano <pcat624@gmail.com>
Date: August 10, 2026 at 4:10:53 PM PDT
To: planningcommission@roseville.ca.gov
Subject: Sierra View Shopping Center-objection

Please accept this email as our formal objection to the proposed plaza development.

We live in Del Webb Westpark, and our property backs up to Pleasant Grove Boulevard. We understood and accepted the traffic associated with Pleasant Grove when we purchased our home. However, what we did not anticipate was the extremely dense concentration of commercial development that has occurred between Upland Drive and Fiddyment Road.

All summer, we have endured significant dust, dirt, construction equipment noise, and constant truck traffic. Now, we are facing the prospect of enduring these conditions again next year, directly behind our homes.

With Safeway, Costco, and the new gas station already located on the south side of Baseline Road, is additional commercial development really necessary in this relatively small area? The proposed center will bring even more traffic, delivery trucks—including the possibility of late-night truck activity—additional lighting, noise, and increased air pollution directly into an area surrounded by residential neighborhoods. Our quality of life is already being affected, and this additional development will only intensify those impacts. Increased noise, light, and air pollution are particularly concerning, as is the potential impact that a high-traffic commercial center could have on surrounding property values.

We welcome Costco, Target, Home Depot, and other commercial development along Baseline Road. However, we believe this particular center is unnecessary and poorly located at an already extremely busy intersection.

Traffic at this intersection is already a serious concern. Drivers regularly run red lights after becoming frustrated by long lines of traffic and having to wait through multiple signal cycles. Adding another major commercial center will only increase congestion and create additional safety concerns for both drivers and pedestrians.

We also sincerely hope that the mature trees lining the south side of Pleasant Grove Boulevard will not be impacted, removed, or compromised to accommodate access or egress driveways associated with this development. Those trees provide an important buffer between the roadway and surrounding neighborhoods and should be preserved.

I sincerely question whether residents' voices truly matter when it comes to development decisions in Roseville. The significant neighborhood opposition to the Grocery Outlet location did not appear to change the City's decision, despite the concerns raised by residents.

Nevertheless, we feel obligated to make our concerns known and formally object to this proposed development. We respectfully ask the City to reconsider whether another commercial center is appropriate or necessary for this already heavily developed and congested area, and to carefully consider the impact this project will have on the surrounding neighborhoods.

Thank you for taking the time to consider the concerns of the residents who will be most directly affected by this project.

David and Patti Catalano
2128 Benton Loop

From: mary gale <msmary_gale@hotmail.com>
Sent: Saturday, August 8, 2026 1:49 PM
To: Planning Commission <PlanningCommission@roseville.ca.gov>; City Clerk <CityClerk@roseville.ca.gov>
Cc: mary gale <msmary_gale@hotmail.com>
Subject: Opposition to SVSP PCL JM-41 – Sierra View Shopping Center, File PL25-049

Dear Members of the Planning Commission, Mayor, and Members of the Roseville City Council:

I am writing to strongly oppose the proposed Sierra View Shopping Center (PL25-0496) at Fiddyment Road and Pleasant Grove Boulevard.

I have been a resident of The Club at WestPark, a 55-and-older active adult community of single-family homes, since 2014. Our neighborhood is bounded by Fiddyment Road, Pleasant Grove Boulevard, and Village Green Drive. We chose this community because of its residential character, quality of life, and peaceful enjoyment of our homes.

The proposed Sierra View development threatens those qualities.

Our neighborhood is already experiencing extreme traffic congestion, noise, air pollution, and increased nighttime activity from the commercial development that has occurred around us. The shopping center across Pleasant Grove, anchored by Safeway, has already brought substantial traffic and noise to the area. The newly opened Costco center has added another major source of traffic and activity.

There is already a gas station directly across the intersection from the proposed Sierra View site. Adding another fuel station, multiple drive-through restaurants, additional retail, and a grocery store to this already heavily commercialized intersection would substantially intensify the problems surrounding residents are already experiencing.

● Traffic, with thousands of additional vehicle trips affecting surrounding roads and residential streets.

● Noise, including drive-through activity, customer traffic, deliveries, trash collection, and nighttime operations.

● Air pollution from increased vehicle traffic and idling vehicles.

● Light pollution from parking lots, buildings, signage, security lighting, and nighttime operations.

● Commercial deliveries and activity immediately adjacent to established residential neighborhoods.

● Potential public-safety concerns, including the possibility of increased loitering, disturbances, vandalism, and other criminal activity associated with having a commercial area operating 24 hours a day. A continuously operating location with fuel, food, parking, and multiple drive-through businesses can become a gathering place during overnight hours for individuals or groups, including potentially organized groups or gangs. The City should carefully evaluate this potential impact on the surrounding residential community before approving the project.

Our residential streets should not be transformed into a 24-hour-a-day traffic conveyor belt and expressway serving an ever-expanding commercial district.

Our Mello-Roos contribution:

Residents of West Roseville continually pay the substantial surcharge toward the infrastructure and public facilities associated with the development of this area through Mello-Roos Community Facilities District taxes.

Residents have therefore already made a significant financial contribution that makes continued development of West Roseville possible. That development cannot be endless if West Roseville is to continue to be a highly desirable residential

destination.

We understand that paying Mello-Roos does not give residents a right to prevent future development. However, it is reasonable to expect the City to consider the cumulative burden that continued development places on the residents who are already paying for and living with the consequences of that growth.

We should not be expected to accept an ever-increasing level of commercial traffic, noise, pollution, nighttime activity, and potential public-safety concerns simply because additional development is possible.

Please scale down this project

I respectfully ask the City not only to consider denying the project as currently proposed, but, if the City determines that some development of this property is appropriate, to require that the project be substantially scaled down.

The current proposal—with a grocery store, multiple drive-through restaurants, a new fuel station, retail buildings, extensive parking, deliveries, and potentially 24-hour activity—is simply too intensive for this location next to established residential neighborhoods.

A smaller, less intensive development with significantly less traffic and fewer late-night uses would be far more compatible with the surrounding community.

Meaningful notice to affected residents

I understand that the City's formal public-hearing notification requirement may be limited to property owners within 300 feet of a proposed development. However, the effects of Sierra View will extend far beyond an arbitrary 300-foot boundary.

Residents and Home Owners throughout The Club at WestPark will experience the increased traffic, noise, air pollution, and light

pollution generated by this development. Every resident who will be affected should have been given meaningful notice and an opportunity to understand and comment on a project of this magnitude.

While the City may be complying with the minimum legal notification requirement, limiting notice to a 300-foot radius does not adequately serve the broader residential community that will experience the consequences of this project.

As residents and taxpayers who contribute substantially to the City of Roseville, we deserve transparency and meaningful opportunities to participate in decisions that directly affect our homes and quality of life.

I therefore respectfully request that the City:

1. Reject the Sierra View Shopping Center as currently proposed;

2. If development is permitted, substantially scale down the project and reduce its traffic-generating and late-night uses;

3. Conduct a thorough evaluation of the cumulative traffic, noise, air-quality, light-pollution, and public-safety impacts of Sierra View together with the existing Safeway center, existing gas station, Costco development, and other surrounding commercial development;

4. Give surrounding residents timely notice of all future public meetings, hearings, significant project revisions, and decisions concerning PL25-0496, even when residents fall outside the City's minimum 300-foot notification radius; and

5. Ensure that residents have a meaningful opportunity to provide public comment before any final approval is granted.

This is not simply a question of adding another shopping center. It is a question of how much additional commercial development

an established residential community can reasonably absorb without sacrificing its quality of life.

I ask the Planning Commission, Mayor, and City Council to remember that behind the traffic counts, development plans, and zoning maps are people who have lived here for years, paid their taxes, invested in their homes, and contributed to the community.

Please do not sacrifice the peaceful use and enjoyment of our homes—and potentially our property values—for an unnecessarily intensive commercial development when a more appropriately scaled project could serve the community without imposing such severe impacts on surrounding residents.

Please enter this letter into the public record for Sierra View Shopping Center, PL25-0496.

Sincerely,

Mary Gale

2112 Coryton Lane
Resident and Home Owner, The Club at WestPark
Roseville, California 95747

Outlook

Opposition SVSP PCL JM-41 & WRSP PCL W-20- Sierra View Shopping Center; File #PL25-0496

From Megan Drouhard <megmarie17@hotmail.com>
Date Fri 7/24/2026 10:15 AM
To Singer, Eric <EJSinger@roseville.ca.us>

External: This email was sent by a person from outside your organization. Exercise caution when clicking links, opening attachments, or taking further action.

Caution: The sender name (Megan Drouhard) is different from their email address (megmarie17@hotmail.com), which may indicate an impersonation attempt. Verify the email's authenticity with the sender using your organization's trusted contact list before replying or taking further action.

Dear Eric Singer and Members of the Planning Commission,
My name is Megan Drouhard (my husband is James Coghill) and I am a resident living in the neighborhood adjacent to the proposed project site at 1875 Pleasant Grove Blvd. I am writing to formally voice my strong opposition to the requested Conditional Use Permit and Design Review Permit for the Sierra View Shopping Center (File #PL25-0496).

As a directly impacted neighbor, I have significant concerns regarding the scope of this development—particularly the fueling station, drive-through restaurants, and overall 58,000-square-foot commercial footprint. My primary objections center on the following issues:

Proximity & Noise Pollution: Operating a gas station and drive-through facilities immediately adjacent to a residential parcel will introduce persistent noise from drive-through speakers, vehicular idling, late-night deliveries, and increased foot traffic at all hours, severely impacting our quality of life.

Child & Pedestrian Safety: Our neighborhood is home to many children who ride bikes, walk, and play outside. The heavy traffic generated by drive-throughs and a fueling station will create dangerous congestion and increased vehicular hazards on streets meant for families.

Disruptive Behavior & Security: Introducing high-turnover commercial uses directly against residential homes opens our neighborhood up to disruptive behavior, trash, loitering, and unwanted foot traffic. Residents are concerned about safety risks, potential property casing, and unauthorized access to our private residential areas and the new community park being built.

Property Values: The combined impacts of traffic, light pollution, noise, and security risks will make our neighborhood a far less desirable place to live, negatively impacting the property values of our homes.

Proposed Mitigation Measures

If the City or Planning Commission chooses to approve this project despite resident opposition, I strongly urge you to require strict, mandatory mitigation measures to protect our community, including:

1. **A Solid Concrete Sound/Privacy Wall:**Construction of a tall, substantial concrete barrier separating the commercial parcel from the residential neighborhood to buffer noise, block visual intrusion, and preserve home privacy.

2. **Access Control / Neighborhood Gating:** Implementing physical barriers or gates to restrict direct pedestrian and vehicle access from the shopping center into our residential streets and new park, preventing foot traffic from wandering into our community.

Please include this letter in the public record for the upcoming August 13, 2026 Planning Commission Public Hearing.
Thank you for your time and for considering the safety and well-being of local residents.
Sincerely,

Megan Drouhard & James Coghill
7001 Lakehaven Dr
316-215-4851

Get Outlook for iOS