



Sun City Roseville Community Association, Inc.®

Derek Odgen, Senior Planner
City of Roseville
311 Vernon Street
Roseville, California 95678

April 24, 2026

Subject: Comments on Draft EIR – Phillip Road Project (State Clearing house No. 2025060240)

Mr. Odgen,

Thank you for extending the deadline to review, assess and respond to the Draft Environmental Impact Report (DEIR) for the Phillip Road project. The Sun City Roseville Community Association (SCRCA) response was prepared pursuant to the California Environmental Quality Act (CEQA) and represents the interests of 3110 active-adult households and over 5,000 residents who live in west Roseville. We appreciate the opportunity to continue to engage in the review process for this project. The City's commitment to transparency and community-informed planning reflects the collaborative spirit SCRCA has valued for soon to be three decades. These comments are offered in that same spirit.

This submission identifies significant issues, comments, and concerns that could actually or potentially impact our community's health, safety, and quality of life should the project be approved. These factors are relevant not only during construction and after completion, but also as the business and residential community matures in the coming years when latent and unanticipated issues become apparent.

We believe our responses highlight concerns regarding the lack of clarity and specificity of several critical sections of the DEIR. These areas may require additional review, revisions, or in certain instances, replacement.

Our comments for review and consideration are presented under the heading "Questions and Requests for Clarification in the Final EIR." They consist of fifty-one (51) questions organized into eighteen (18) categories, structured to align with the chapters of the DEIR. This organization is intended to assist the City Council in evaluating our responses and making fully informed and legally defensible decisions.

We expect that the Final EIR will deliver a comprehensive, precise, and enforceable environmental analysis in written form for each item in the "Responses to Comments Section." This should include enhanced clarity and specificity through supplementary analysis, data, and/or mitigation measures, thereby ensuring full compliance with CEQA.

Our objective remains the protection of our community's environment, public safety, and lifestyle our residents currently are seeking so that we can prepare for the next phase – the Planning Commission review.

Respectfully submitted,

Yvonne Bond, Board President
Sun City Roseville Community Association

Cc: Board of Directors
Executive Director

QUESTIONS AND REQUESTS FOR CLARIFICATION IN THE FINAL EIR

1. Project Description & Land Use Specificity

The DEIR describes a mixed-use development of considerable scale, including up to 1,062,041 square feet of innovation center and commercial uses. However, the document appropriately acknowledges that actual tenants are not yet known. SCRCA recognizes the planning flexibility this requires while also noting that the range of potentially permitted uses—including specialized industrial, data centers, and pharmaceutical manufacturing up to biosafety level 2—represents a very wide spectrum of environmental intensities.

Q: *Does the projected 49 MVA power demand reflect the highest reasonably foreseeable intensity of use related to the project description, or does it represent a conservative mid-range scenario? Was a maximum-intensity power demand scenario evaluated for purposes of CEQA impact assessment?*

Q: *Why did the City choose not to apply its existing Technology/Business Park land use designation for this project? How do the siting criteria for that designation compare to the Phillip Road site's characteristics, and what drove the decision to use Innovation Tech Park–Planned Development zoning instead?*

Q: *Does the proposed General Plan Amendment, which converts approximately 219 acres from Public/Quasi-Public to multiple designations including Light Industrial and Community Commercial, trigger General Plan Policy LU9.3 regarding the preparation of a Specific Plan for significant land use modifications? If not, please explain the basis for that conclusion.*

2. Traffic and Circulation

Traffic impacts are of significant concern to SCRCA members, many of whom rely on Blue Oaks Boulevard, Phillip Road, and the surrounding roadway network for daily travel. The DEIR identifies several significant and unavoidable traffic impacts, which SCRCA acknowledges may reflect legitimate infrastructure constraints. However, SCRCA asks for additional clarity on the following points.

Q: *Mitigation Measure 3.3-2 states that 270 feet of sidewalk along Blue Oaks Boulevard cannot be provided and that this represents a significant unavoidable impact. Please explain in detail why the applicant cannot construct this sidewalk segment as a condition of approval and be reimbursed through a reimbursement agreement when the adjacent property develops, as has been done in other Roseville development contexts.*

Q: *Mitigation Measure 3.3-4 acknowledges that transit service to the project cannot be fully mitigated because of a residual funding gap after the applicant's fair-share contribution. Please quantify that funding gap in dollar terms, identify the specific mechanism by which additional funding would be secured, and clarify whether transit service would be operational by the time of first occupancy.*

3. Greenhouse Gas (GHG) Emissions

SCRCA recognizes that climate change is among the most consequential long-term challenges facing the region. A project of this scale, with a build-out horizon extending to 2038 and potential energy-intensive uses, warrants rigorous and transparent GHG analysis.

Q: *Is the project fully consistent with the City of Roseville Climate Action Plan (CAP), and how is that consistency demonstrated? Does the analysis account for all project-related emissions, including embodied carbon from construction materials and upstream supply chain emissions associated with industrial uses?*

Q: *If GHG offsets are proposed as part of the mitigation program, are they geographically proximate to the project, legally enforceable through recorded instruments, subject to third-party monitoring and verification, and permanent in nature?*

Q: *Does the GHG analysis account for anticipated grid decarbonization of Roseville Electric's power supply through the projected 2038 full buildout year? If so, what decarbonization trajectory was assumed, and what is the source for that assumption?*

Q: *If residual GHG emissions remain significant and unavoidable after mitigation, does the DEIR provide substantial evidence sufficient to support a future Statement of Overriding Considerations, including a qualitative and quantitative comparison of project benefits and residual harms?*

4. Cumulative Air Quality and Toxic Air Contaminants

The Phillip Road Project is located in western Roseville, within the broader Sacramento Valley Air Basin, which is in nonattainment for multiple criteria pollutants. Sun City Roseville residents, many of whom have age-related respiratory health vulnerabilities, have a heightened interest in the adequacy of air quality analysis and mitigation.

Q: *What is the project's estimated incremental contribution to regional cancer risk from toxic air contaminants (TACs), including diesel particulate matter from construction and operational truck traffic? Were sensitive receptors in the Sun City Roseville community specifically evaluated in the health risk assessment?*

5. Noise Impacts

SCRCA members living nearest to the Blue Oaks Boulevard and Phillip Road corridors are already experiencing increasing traffic noise as western Roseville builds out. The addition of this project's traffic volumes, combined with cumulative growth from the Creekview, Amoruso Ranch, and West Roseville Specific Plans, represents a meaningful potential increase in ambient noise levels.

Q: *Were potential mitigation measures such as noise barriers (sound walls), increased building setbacks, building orientation adjustments, speed management (lower posted speed limits), or quieter pavement treatments evaluated in detail for the affected roadway segments? If so, which were found feasible and which were not, and on what basis?*

Q: Is there a clear feasibility analysis in the DEIR explaining why specific noise mitigation strategies were determined to be infeasible? SCRCA asks that the Final EIR provide explicit written findings for each rejected mitigation option.

Q: Does the DEIR fully evaluate the potential for increased traffic noise exposure on Sun City Roseville residents specifically, given our community's proximity to Blue Oaks Boulevard and Phillip Road? Were noise monitoring measurements taken at receptor locations within Sun City Roseville?

Q: If future traffic volumes result in noise levels exceeding those identified in the current DEIR analysis (see DEIR pages 3.6-9, 17, 18, and 19), what legal mechanisms would be in place to require reassessment and additional mitigation? Could the Mitigation Monitoring and Reporting Program (MMRP) include a noise monitoring trigger?

Q: Should the DEIR consider the potential need for modification or upgrading of existing boundary sound walls along Blue Oaks Boulevard and Phillip Road if project-related traffic noise levels increase beyond currently modeled conditions? Under what circumstances would the cost of future sound wall improvements fall to the project developer, the City, or another funding source?

6. Fire Protection Services

Sun City Roseville is an active-adult community, and fire and emergency medical response times are critically important to our residents' safety. SCRCA notes that western Roseville is served by a limited number of fire stations, and that additional development will increase call volumes across the existing service network.

Q: What are current 90th percentile response times for fire (8-minute standard) and EMS (7-minute standard) calls to the western Roseville area, and how do those compare to the adopted performance benchmarks cited in the DEIR? Are those benchmarks currently being met?

Q: Has the DEIR evaluated the cumulative effect of adding 664 new dwelling units and up to 980 employees on the western Roseville service area's 90th percentile response performance, particularly in light of the concurrent build-out of Creekview, Amoruso Ranch, and other nearby specific plans?

Q: Can the City provide project-specific call generation rate estimates and a station-level capacity analysis demonstrating that adopted response standards will be maintained without requiring new facilities or staffing beyond what is funded by the project's CFD contributions?

Q: What role does the planned Fire Station No. 11 play in maintaining response time benchmarks for the western Roseville area? Is Station No. 11 expected to be operational prior to first residential or commercial occupancy of the Phillip Road Project? If not, what interim service arrangement would apply?

Q: Should the DEIR require an urban wildfire hazard assessment if battery energy storage systems (BESS) or other high-energy battery installations are contemplated as part of the project's backup power infrastructure?

7. Police Protection Services

Q: What is the Roseville Police Department's current 90th percentile response performance relative to its adopted 3-minute emergency response goal for Priority 1 calls? Is that standard currently being met in the western Roseville service area?

Q: Has an estimate been prepared of anticipated project-related police calls for service, broken down by land use type (residential, retail, innovation center)? How does that estimate compare to current station capacity?

Q: In addition to relying on CFD revenue and general fund projections, can the Final EIR provide a performance-based capacity analysis demonstrating that adopted response standards will be maintained throughout the project's phased build-out period?

8. School Capacity

The Phillip Road Project includes 529 single-family units and up to 135 multi-family units, which will generate school-age children requiring enrollment in Roseville Joint Union High School District and Roseville City School District for the Elementary.

Q: What is the current enrollment and remaining capacity of the specific school facilities including elementary, middle, and high schools anticipated to serve students generated by the Phillip Road Project?

Q: The DEIR notes that a previously planned school site within the Amoruso Ranch Specific Plan has been removed. How does this affect long-term school capacity planning in western Roseville? Has the Final EIR been coordinated with both affected school districts to confirm that adequate capacity exists or will exist concurrently with project occupancy?

9. Library Services

Q: The DEIR acknowledges that the project would add demand to what it characterizes as an "already overburdened library system." What are the current per-capita library service levels in the western Roseville area compared to the City's adopted General Plan standards? Does the City currently meet those standards for residents in this area?

Q: The nearest library branch is approximately five miles from western Roseville residents. Does the City have a plan or timeline for providing a library branch in western Roseville commensurate with the area's population growth? Could a library facility contribution be included as a condition of project approval?

10. Parks and Recreation

Q: Does the City currently meet its adopted citywide park acreage standard of five acres per 1,000 residents, and how would the addition of approximately 1,614 new residents from this project affect that citywide ratio?

Q: The project includes 4.9 acres of neighborhood park (two parks). Is western Roseville adequately served by larger community parks and regional recreational facilities that would be accessible to new Phillip Road Project residents? Have nearby parks been evaluated for current utilization levels?

Q: Can the Final EIR confirm that cumulative park standards will remain achievable with the build-out of the Phillip Road Project and all other approved or pending west Roseville projects, including Creekview, Amoruso Ranch, and West Roseville Specific Plans?

11. Public Transit

Q: What specific mechanisms—contractual, regulatory, or otherwise—ensure that transit service will actually be implemented and maintained at a meaningful level of service to the project site? Are any performance standards, such as minimum service frequency or hours of operation, incorporated into the mitigation measures or conditions of approval?

Q: If transit service to the project is reduced or discontinued in the future due to budget constraints or low ridership, what contingency mitigation measures would apply to compensate for the loss of that service?

12. Public Services: Methodology and Cumulative Analysis

Q: Can the Final EIR provide additional detail regarding the service demand factors, modeling assumptions, and capacity comparisons used in the public services analysis? In particular, what per-unit demand generation rates were used for fire, police, library, and parks services, and what is the source for those rates?

Q: How does the public services analysis account for the cumulative increase in demand from other approved and pending projects in western Roseville, including Creekview, Amoruso Ranch, and the West Roseville Specific Plan? Does the cumulative analysis confirm that all adopted General Plan service performance standards will continue to be met?

Q: Where the DEIR concludes that public service impacts are less-than-significant on the basis of CFD fee payment or revenue generation alone, can the Final EIR clarify whether new or expanded physical facilities would also be required to maintain adopted service performance benchmarks? If so, what is the plan and timeline for those facilities?

13. Energy Demand, Electrical Substation, and Power Generation

The project's projected peak electrical demand of 49 megavolt-amperes represents an extraordinary infrastructure commitment and raises important questions about cost allocation, generation sources, and the project's consistency with state and local renewable energy goals.

Q: Can the Final EIR provide additional detail regarding the projected 49 MVA electrical demand, including the assumptions underlying that estimate? How will the electricity required to serve the project be generated, and what proportion is anticipated to come from renewable versus fossil fuel sources?

Q: How will the capital costs of the proposed new on-site electrical substation be allocated between the project applicant and Roseville Electric ratepayers? Will existing Roseville Electric customers bear any portion of the cost of this infrastructure, and if so, how will ratepayer protections be ensured?

Q: Would it be feasible and beneficial to include specific, enforceable renewable energy performance standards—such as minimum solar-generation capacity, battery storage requirements, and all-electric building standards—as project conditions of approval rather than deferring those determinations to future discretionary permitting?

Q: Were high-energy-use operations such as data centers analyzed at full operational power demand (including cooling systems) for purposes of the DEIR's energy, GHG, and water supply analyses? If tenant energy demand ultimately exceeds current DEIR assumptions, what mechanism would ensure that environmental impacts remain within analyzed and disclosed thresholds?

14. Growth-Inducing Impacts

Q: Does the proposed rezoning of approximately 219 acres of City-owned land from Public/Quasi-Public to development designations meaningfully accelerate the pace of residential and commercial development in western Roseville beyond what is contemplated in the currently adopted General Plan? If so, has that acceleration been fully analyzed?

Q: Could the Phillip Road Project influence the timing or financing of major regional infrastructure investments, such as the Placer Parkway, in ways that could have secondary environmental effects not fully analyzed in the DEIR? Has the Final EIR considered the project's potential to serve as a catalyst for adjacent undeveloped parcels?

15. Mitigation Measures and Enforceability

SCRCA is concerned that several of the DEIR's mitigation measures are framed in vague, aspirational terms that may not be enforceable as conditions of project approval. CEQA requires that mitigation measures be specific, feasible, and enforceable.

Q: Could the Final EIR strengthen mitigation measures by including specific, measurable performance standards rather than relying on phrases such as 'to the maximum extent feasible,' 'substantial portion,' or 'where practicable'? For Mitigation Measure 3.5-1(a), what minimum solar generation capacity (in MW DC) is anticipated, and how will 'feasibility' be defined and enforced?

Q: Should battery energy storage system (BESS) capacity requirements be specified in the MMRP with quantitative targets to ensure that GHG reduction benefits are actually achieved, rather than left to future discretionary review?

Q: Should offsite GHG offset requirements be structured as ongoing annual obligations throughout the operational life of the project, rather than a one-time purchase? Should the MMRP require that offsite offsets be used only after all feasible onsite emission reduction strategies have been fully exhausted?

16. Alternatives Analysis

Q: Should the Final EIR evaluate a 'Maximum Renewable Energy / High Efficiency' alternative that incorporates all-electric building design, on-site renewable generation, high-efficiency water fixtures, and reduced parking to reflect a scenario in which energy-intensive uses such as data centers are tenants? This alternative would help decision-makers understand the full range of feasible environmental outcomes.

Q: Would analysis of a 100% renewable energy procurement scenario, in which all project electricity is sourced from verified renewable generation, help decision-makers assess the potential for significant GHG reductions without requiring changes to the project's physical footprint?

17. Fiscal, Ratepayer, and Water Supply Considerations

Q: How will long-term electrical infrastructure maintenance and operational costs be allocated between the project's future property owners and Roseville Electric ratepayers? Are there legal mechanisms—such as a public utility easement agreement or ratepayer protection covenant—that would prevent existing customers from bearing disproportionate costs?

Q: If water-intensive uses such as data centers are developed on the project site, what are the projected daily water demands for cooling (both potable and recycled water), and how could those demands affect reclaimed water pricing and availability for other western Roseville users, including irrigation customers in Sun City Roseville?

Q: Does the Water Supply Assessment incorporated into the DEIR reflect climate-adjusted hydrologic assumptions that account for projected long-term reductions in Sierra Nevada snowpack and increased drought frequency? Is long-term water supply reliability dependent on future infrastructure improvements that are not yet funded or permitted?

18. Hazards and Public Safety

Q: The ITP-PD zoning permits certain specialized industrial uses, including pharmaceutical and medicine manufacturing up to biosafety level 2 (BSL-2), alternative energy product manufacturing, and data centers. If EV battery component manufacturing or large-format BESS installations are permitted on site, what hazardous air pollutant emissions, fire risks, and emergency response requirements could arise, and how would those be mitigated?

Q: The DEIR states that BSL-3 and BSL-4 uses are prohibited. Will this prohibition be codified clearly and explicitly in the Planned Development ordinance that is adopted as part of project approval, such that it is legally enforceable without further discretionary action? Can the Final EIR include the draft zoning ordinance language for public review?