From: [redacted]
To: planningdivision@roseville.ca.us; ejsinger@roseville.ca.us; dogden@roseville.ca.us
Subject: Philip Road Site EIR Comment
Date: Thursday, April 30, 2026 3:01:12 PM

[redacted]

To whom it may concern,

My name is [redacted]. I am a Roseville resident. These are my comments about the Phillip Road Site EIR. Please let me know if you received this email. Thank you.

The following comments are in regards to section 3.10 of the EIR:

The EIR claims that school impacts are "less than significant" purely because fees are being paid. However, paying a fee does not physically transport a child to school. By acknowledging the Amoroso Ranch school is canceled, the EIR essentially admits that hundreds of students will be forced to commute to Vencil Brown Elementary or Buljan Middle School. An 16-mile round trip, twice a day, for hundreds of families will generate a massive increase in Vehicle Miles Traveled (VMT) and resulting Greenhouse Gas (GHG) and tailpipe emissions. The EIR improperly ignores this induced traffic and pollution. The EIR has illegally segmented its analysis. By failing to build a local school, the project generates severe, unmitigated mobile-source emissions that are not accounted for in the Air Quality or GHG sections.

The EIR **must** recalculate the applicable report sections to account for the increase in VMT and GHG emissions as a result of the lack of neighborhood school. The EIR **must** require the developer to fund a zero-emission school bus fleet or a localized electric micro-transit shuttle dedicated specifically to transporting students from this project to distant schools.

The EIR states that the project will construct 664 new residences, which it estimates will generate between 1,550 and 1,650 new residents. This drastically underestimates the demographic reality of West Roseville, where family sizes are typically much larger, particularly in multi-family and immigrant households. By artificially deflating the population estimate, the EIR systematically undercounts the project's entire environmental footprint. A lower population means the EIR under-calculates the number of students entering the district, the number of daily vehicle trips, the demand for water and sewer, and the required acreage for parks.

The EIR **must** be revised to use accurate, localized census data for West Roseville

household sizes rather than the generic averages provided by Panittoni (see table 2-8 in the EIR). Since the baseline population calculation is flawed, the entire impact analysis for schools, traffic, parks, and utilities is consequently invalid and must be recalculated.

The EIR explicitly admits that the proposed school for the adjacent Amoroso Ranch Specific Plan area "is no longer proposed by the School District". The applicant **must** enter into a "Voluntary Mutual Benefit Impact Fee Agreement" under Ordinance 2434 to bridge the funding gap for the Amoroso Ranch School. There should also be the creation of a Mello-Roos Community Facilities District (CFD) with a specific special tax tier dedicated entirely to local school capital construction.

The EIR blatantly admits: "The project would increase demand on an already overburdened library system, but would not meet the criteria to build a new library". It concludes the impact is "less than significant" simply because the developer pays a Public Facilities Fee. Paying a fee into a general fund does not give residents a place to read or study if the closest library is 5 miles away and already over capacity. As a mitigation, the developer **must** provide an on-site, fully funded "micro-library," community reading room, or automated book kiosk within the commercial/mixed-use portion of the development.

The EIR notes that the project will rely on a *future* Fire Station #11 to be built in the Amoruso Ranch area. Given that the Amoruso Ranch school was already canceled due to funding shortfalls, there is a high likelihood this fire station could face similar delays. If it is delayed, response times to the new homes could plummet.

There **must** be a phasing mitigation measure: No building permits for later phases of the Phillip Road Project may be issued until Fire Station #11 is physically constructed, fully staffed, and operational. Relying on an unbuilt fire station to justify safety is an unacceptable risk to future residents.

The following comments are in regards to section 3.4 of the EIR:
Mitigation Measure 3.4-3a relies entirely on providing "educational material" to tenants to reduce emissions from consumer products. The proposed materials merely "encourage" the use of green products that generate lower volatile organic compounds (VOCs). This is an unenforceable measure; relying on voluntary behavioral changes from residents should not legally count as a concrete emission reduction strategy.

The project proposes an exorbitant amount of backup diesel power. The plan includes fifteen 3-megawatt (MW) generators with 4,000 HP each for the data center, alongside twelve emergency diesel generators with 500 HP for commercial buildings. Even with the

requirement to use Tier 4 engines, the sheer volume of diesel generation will create massive localized toxic air contaminants (TACs) and criteria pollutants.

The document acknowledges that the combined maximum risk level at the Maximum Exposed Individual Receptor (MEIR) would be 21.2 chances in one million. This significantly exceeds the local significance threshold of 10 chances in one million.

The EIR attempts to mitigate the unacceptable cancer risks by requiring Tier 4 construction equipment and Tier 4 generators. However, the EIR admits that future emission rates for alternative data center backup power technologies are "not known now," making the exact long-term mitigated health risk ambiguous.

To directly address these flaws and ensure the developer actually reduces impacts *on-site* rather than buying their way out for a single year, the following additional mitigation measures **must** be added:

Mandatory Battery Energy Storage Systems (BESS): Instead of allowing twenty-seven diesel generators for the project, require the data center and commercial buildings to use BESS, hydrogen fuel cells, or solar microgrids for backup power.

Mandatory Zero-Emission Construction Equipment: Go beyond Mitigation Measure 3.4-4a's allowance for Tier 4 diesel equipment. The City should mandate that all construction equipment under a certain horsepower limit, or where commercially available, be fully electric or zero-emission.

Enforceable Low-VOC Purchasing Requirements: Replace the weak "educational materials" strategy in Mitigation Measure 3.4-3a with a binding requirement. The City should mandate that commercial property management agreements and institutional purchasing contracts strictly require the use of zero-VOC or low-VOC architectural coatings, cleaning supplies, and landscaping equipment.

Advanced Indoor Air Filtration: Require MERV 13 or greater air filtration systems to be installed and continuously maintained in all on-site and adjacent sensitive receptors. This is particularly critical for protecting the single-family residences built during Phase R2 from heavy-duty truck emissions and diesel particulate matter.

Commercial Truck Restrictions and Shore Power: Mandate that all loading docks for the data center and retail buildings be equipped with electrical hookups (shore power). This physically prevents transport refrigeration units (TRUs) and heavy-duty trucks from needing

to idle. Additionally, the City should strictly enforce a maximum idling time of 3 minutes on the premises.

100% All-Electric Buildings: Require all newly constructed residential and commercial buildings to be fully electric. This would eliminate the need for on-site natural gas infrastructure and completely prevent local combustion emissions from heating, cooling, and cooking.

The following comments are in regards to section 3.5 of the EIR:
Mitigation Measure 3.5-1d requires the applicant to purchase off-site GHG reduction credits to compensate for emissions exceeding the 10,000 MTCO2e threshold "for a single year". This is a glaring flaw. The project will generate operational emissions for decades, yet the developer is only required to mitigate the excess mass emissions for one single year.

Mitigation Measure 3.5-1a claims the applicant will "evaluate and implement alternatives" to diesel backup generators for the data center. However, it includes a massive loophole, stating that the "most practical and commercially available alternative" to diesel generators shall be chosen. This vague language gives the developer an easy out to claim that cleaner technologies (like battery storage or hydrogen) are too expensive or not "practical," allowing them to default back to massive fossil-fuel generators.

Mitigation Measure 3.5-1c requires the use of renewable natural gas for nonresidential uses, but only "as commercially available". This is an unenforceable, moving target that allows the applicant to easily revert to standard fossil natural gas if renewable sources are deemed too difficult or costly to procure at any given time.

Mitigation Measure 3.5-1b mandates that no natural gas infrastructure be permitted, but applies this *only* to nonresidential buildings that do not require it for manufacturing. The EIR completely ignores the residential portions of the project. The document notes the project includes "residential development" and "high density residential", yet in section 3.5, there is no requirement to fully decarbonize or electrify these homes.

The operational GHG mitigations strictly focus on building energy, natural gas, and backup power. Despite acknowledging that mobile-source emissions would result from employee, resident, and heavy-duty truck vehicle miles traveled (VMT), there are no concrete, enforceable on-site mitigations proposed to directly reduce these transportation emissions.

To address these flaws and force the developer to take real, long-term responsibility for the

project's climate impacts, the following additional mitigation measures **must** be added:

Mitigation Measure 3.5-1d must be completely rewritten. If the developer is going to rely on off-site carbon credits, they must be required to purchase offsets for the *entire operational lifetime* of the project (standard CEQA practice is typically 30 to 50 years), not just a single year. Better yet, the City should require the project to achieve true Net-Zero GHG emissions on-site.

Mitigation Measure 3.5-1a must be strengthened to strictly mandate the use of Battery Energy Storage Systems (BESS) or green hydrogen fuel cells for the data center's primary backup power. The City should remove the "commercially available/practical" exception and place a strict, non-negotiable cap on the amount of diesel backup generation permitted on the site.

Expand Mitigation Measure 3.5-1b to require the total elimination of natural gas infrastructure for *all* phases of the project, including all single-family and high-density residential units. All homes should be built 100% electric, utilizing heat pumps for HVAC and water heating, and induction cooktops.

Add a new mitigation measure requiring the project to install solar photovoltaic (PV) arrays on all available commercial, data center, and residential rooftops. Furthermore, mandate that all surface parking lots be covered with solar canopies. The project must maximize on-site clean energy generation to offset its massive electricity demands before being allowed to purchase off-site credits.

To address the unmitigated mobile source emissions, a robust, binding Transportation Demand Management (TDM) plan **must** be added. The City should mandate that the project exceed CALGreen building code minimums by providing 100% EV-ready parking spaces and installing a high percentage of active Level 2 and DC Fast Chargers. Additionally, The City should require the developer to subsidize transit passes for employees and residents to actively reduce daily vehicle trips.

The following comments are in regards to section 3.1 of the EIR:
The City's own General Plan Policy LU9.9 explicitly mandates that development proposed on the western edge of the City "shall provide a distinctive open space transition to create a physical and visual buffer between the City and County". Despite being located directly on the western edge against unincorporated Placer County agriculture, the project proposes heavy "Innovation Tech Park" and residential zoning right up against the border. The EIR

provides no concrete analysis of how industrial loading docks and residential tracts fulfill the requirement for a "distinctive open space transition."

To strictly enforce General Plan Policy LU9.9, the project's site plan **must** be physically redesigned to include a minimum 200-to-300-foot dedicated, un-developable Open Space (OS) buffer along the western property line. This buffer must be heavily planted with native vegetation to ensure the legally required "visual and physical buffer" between the intense commercial uses and the County's agricultural lands is actually created.

The project requires a massive General Plan Amendment (GPA) to change the land from Public/Quasi-Public (meant for civic uses and open space) to intense commercial and residential uses. The EIR essentially argues that because the City is going to amend the General Plan to allow the project, the project no longer conflicts with the General Plan. This is circular logic that fails to justify *why* the public should surrender its public land designation for private sprawl.

This project is built on former public land acquired with taxpayer dollars. Therefore, the approval of the General Plan Amendment **must** be contingent upon the developer establishing a community benefit fund. These funds should be explicitly legally tied to bridging the $59 million shortfall for the canceled Amoruso Ranch TK-8 school, ensuring the privatization of public land directly benefits the surrounding community's immediate needs.

The EIR admits that the City originally acquired this land with public funds for a flood control project, later deemed it unnecessary, and tried to sell it off. However, the City was literally issued a Notice of Violation by the state's Department of Housing and Community Development (HCD) because they failed to properly prioritize this surplus public land for affordable housing developers, as required by the Surplus Land Act. The EIR claims a "settlement agreement" was reached behind closed doors to allow the transfer to the applicant. This is a massive hole: the EIR entirely omits what this settlement entails and completely fails to explain how the developer will physically fulfill the heavy affordable housing obligations intended by the Surplus Land Act on this specific site.

The EIR acknowledges that the project site is designated as Farmland of Local Importance and contains grazing land. However, it completely dismisses the permanent paving over of this 241-acre site by arguing that because the land is not designated as "Prime," "Unique," or of "Statewide Importance," its destruction is "less than significant" under rigid CEQA Appendix G guidelines. This completely ignores the local economic and ecological value of

the farmland to avoid requiring the developer to pay for any agricultural mitigation.

There **must** be a new mitigation measure requiring the developer to purchase a 1:1 agricultural conservation easement. For every acre of Farmland of Local Importance destroyed by this project, the developer must permanently fund the protection of an equivalent acre of agricultural land elsewhere in western Placer County.

The following comments are in regards to section 3.3 of the EIR:
The EIR concludes the project will have a "less than significant" VMT (Vehicle Miles Traveled) impact by claiming the project generates only 14.24 VMT per Service Population, which is suspiciously far below the Citywide baseline of 27.38. It achieves this artificially low number by blending the residential and commercial uses together into a "Service Population" average. By pairing an artificially low residential population estimate (1,726 residents) with high employee estimates (1,129 employees), the EIR dilutes the heavy commuter VMT generated by the residential sprawl, masking the true traffic impact.

The EIR **must** be revised to separate the VMT analysis for the residential and industrial components. The residential VMT must be recalculated using accurate, localized census data for West Roseville household sizes. If the residential VMT exceeds the threshold on its own, strict physical mitigation measures must be required.

The EIR attempts to satisfy transit policy requirements by proposing to construct a simple "bus turnout" along Blue Oaks Boulevard. However, the document blatantly admits that "transit service is not currently provided along Blue Oaks Boulevard near the project site and there are no assurances that adequate transit service would be available to serve the project". Pouring a concrete pad for a bus that does not exist does not physically reduce traffic or mitigate a lack of transit.

A binding mitigation measure **must** be added requiring the developer to fully subsidize the capital and operational costs to extend Roseville Transit fixed-route bus service (or provide a dedicated, electric micro-transit shuttle) to the project site for a minimum of 10 years.

The EIR casually notes that the project, primarily the Innovation Tech Park, will add 130 heavy truck trips per day to Blue Oaks Boulevard and Westbrook Boulevard. While noting these are STAA truck routes, the EIR completely ignores the severe noise, safety, and operational conflicts of injecting 130 massive 18-wheelers daily onto the exact same suburban arterial roads that families will now be forced to use to commute 16 miles round-trip to distant elementary and middle schools.

To protect families who must now commute out of the neighborhood due to the canceled Amoruso Ranch school, strict routing and scheduling restrictions **must** be put into place. Heavy-duty truck deliveries to the Innovation Tech Park must be explicitly prohibited from using local arterials during school drop-off and pick-up hours (e.g., 7:00 AM - 8:30 AM and 2:30 PM - 4:00 PM).

Public comments on the Notice of Preparation explicitly requested an evaluation of "the risks posed by transportation of materials associated with the business/commercial/industrial uses". The Transportation section fails to adequately analyze the specific routing, safety risks, and accident probabilities associated with transporting massive quantities of hazardous materials, specifically the thousands of gallons of bulk diesel fuel that will regularly need to be trucked in to supply the massive data center generators.

A mandatory mitigation measure **must** be added requiring the approval of a Hazardous Materials Transportation Management Plan prior to the occupancy of the Innovation Tech Park. This plan must explicitly prohibit the transport of bulk diesel fuel and industrial chemicals through residential intersections, strictly confining these deliveries to non-peak hours and utilizing direct freeway-to-arterial routes that avoid sensitive receptors.

Because the project is introducing 130 heavy truck trips daily, the proposed painted Class II bike lanes on Blue Oaks Boulevard are entirely unsafe for families and cyclists. The developer **must** fund and construct Class IV physically separated bikeways (using raised curbs or bollards) along all truck routes bordering the project to ensure actual pedestrian and cyclist safety.

Thank you for your time,

[redacted]