6 ALTERNATIVES

6.1 INTRODUCTION

The California Code of Regulations (CCR) Section 15126.6(a) (State CEQA Guidelines) requires EIRs to describe "… a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project and evaluate the comparative merits of the alternatives. An EIR need not consider every conceivable alternative to a project. Rather, it must consider a range of potentially feasible alternatives that will avoid or substantially lessen the significant adverse impacts of a project and foster informed decision making and public participation. An EIR is not required to consider alternatives that are infeasible. The lead agency is responsible for selecting a range of project alternatives for examination and must publicly disclose its reasoning for selecting those alternatives. There is no ironclad rule governing the nature or scope of the alternatives to be discussed other than the rule of reason." This section of the State CEQA Guidelines also provides guidance regarding what the alternatives analysis should consider. Subsection (b) further states the purpose of the alternatives analysis is as follows:

> Because an EIR must identify ways to mitigate or avoid the significant effects that a project may have on the environment (Public Resources Code [PRC] Section 21002.1), the discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly.

The State CEQA Guidelines require that the EIR include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed project. If an alternative would cause one or more significant effects in addition to those that would be caused by the project as proposed, the significant effects of the alternative must be discussed, but in less detail than the significant effects of the project as proposed (CCR Section 15126.6[d]).

The State CEQA Guidelines further require that the "no project" alternative be considered (CCR Section 15126.6[e]). The purpose of describing and analyzing a no project alternative is to allow decision makers to compare the impacts of approving a proposed project with the impacts of not approving the proposed project. If the no project alternative is the environmentally superior alternative, CEQA requires that the EIR "…shall also identify an environmentally superior alternative among the other alternatives." (CCR Section 15126.6[e][2]).

In defining "feasibility" (e.g., "… feasibly attain most of the basic objectives of the project …"), CCR Section 15126.6(f)(1) states, in part:

> Among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries (projects with a regionally significant impact should consider the regional context), and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site (or the site is already owned by the proponent). No one of these factors establishes a fixed limit on the scope of reasonable alternatives.

In determining what alternatives should be considered in the EIR, it is important to consider the objectives of the project, the project's significant effects, and unique project considerations. These factors are crucial to the development of alternatives that meet the criteria specified in Section 15126.6(a). Although, as noted above, EIRs must contain a discussion of "potentially feasible" alternatives, the ultimate determination as to whether an alternative is feasible or infeasible is made by the lead agency's decision-making body, here the City of Roseville City Council. (See PRC Sections 21081.5, 21081[a] [3].)

6.2 CONSIDERATIONS FOR SELECTION OF ALTERNATIVES

6.2.1 Attainment of Project Objectives

As described above, one factor that must be considered in selection of alternatives is the ability of a specific alternative to attain most of the basic objectives of the project (CCR Section 15126.6[a]). Chapter 2, "Project Description," articulated the project applicant's objectives for the proposed Phillip Road Project, which are repeated below:

- design a comprehensively planned community with a mix of land uses to create a balanced community;
- develop a state-of-the-art employment center designed and operated to achieve the highest and best use of the property and create substantial, permanent employment opportunities for residents of Roseville and surrounding areas;
- provide for alternative transportation through connections via a system of open space, creek crossings, paseos, and Class 1A bikeways;
- support the City of Roseville's desire to create a job-housing balance, and provide high-quality employment generating uses in western Roseville;
- provide housing options in varying densities to respond to a range of market segments, including opportunities for affordable housing consistent with the City's General Plan;
- provide a variety of housing options to help the City meet its Regional Housing Needs Allocation (RHNA) obligations;
- utilize, wherever feasible, alternative energy sources, including solar panels when possible;
- locate the project as near as possible to existing utility infrastructure with anticipated capacity;
- locate the project to be accessible from existing roads and minimize the need for construction of major new roadway improvements;
- include a mix of land uses and facilities which, taken together, provide a positive fiscal impact to the City's General Fund;
- plan for long-term growth to be positioned to react to market demand in multiple land use types; and
- minimize environmental impacts to surrounding areas and other sensitive land uses.

6.2.2 Environmental Impacts of the Proposed Phillip Road Project

Sections 3.1 through 3.15 of this Draft EIR address the environmental impacts of implementation of the proposed Phillip Road Project. Potentially feasible alternatives were developed with consideration of avoiding or lessening the significant, and potentially significant, adverse impacts of the project, as identified in Chapter 3 of this Draft EIR and summarized below. If an environmental issue area analyzed in this Draft EIR is not addressed below, it is because no significant impacts were identified for that issue area.

SIGNIFICANT AND UNAVOIDABLE IMPACTS

The project would result in the following significant and unavoidable impacts; that is, no feasible mitigation is available to reduce the project's impacts to a less-than-significant level.

Transportation and Circulation

- Impact 3.3-2: Conflict with Adopted Policies, Plans, or Programs Regarding Pedestrian Facilities

- Impact 3.3-4: Conflict with Adopted Policies, Plans, or Programs Regarding Transit Facilities

Air Quality

- Impact 3.4-3: Long-term Operational Emissions of Criteria Air Pollutants and Ozone Precursors

Greenhouse Gas Emissions and Climate Change

- Impact 3.5-1: Generate Greenhouse Gas Emissions, Either Directly or Indirectly, That May Have a Significant Impact on the Environment

Noise and Vibration

- Impact 3.6-3: Exposure of Existing Sensitive Receptors to Excessive Traffic Noise Levels

LESS-THAN-SIGNIFICANT IMPACTS (WITH MITIGATION)

Additionally, the project would result in the following significant and potentially significant impacts, that can be mitigated to a less-than-significant level:

Air Quality

- Impact 3.4-4: Expose Sensitive Receptors to Substantial Pollutant Concentrations

Greenhouse Gas Emissions and Climate Change:

- Impact 3.5-2: Conflict with an Applicable Plan, Policy, or Regulation Adopted for the Purpose of Reducing the Emissions of Greenhouse Gases

Noise and Vibration

- Impact 3.6-2: Construction-Generated Vibration
- Impact 3.6-4: Long-Term Operational Non-Transportation Noise Levels

Biological Resources

- Impact 3.7-1: Result in Disturbance or Loss of Special-Status Plant Species
- Impact 3.7-2: Result in Disturbance to or Loss of Special-Status Wildlife Species and Habitat
- Impact 3.7-3: Result in Degradation or Loss of Riparian Habitat or Other Sensitive Natural Communities
- Impact 3.7-4: Result in Degradation or Loss of State or Federally Protected Wetlands
- Impact 3.7-5: Interfere with Wildlife Movement Corridors or Impede the Use of Wildlife Nurseries
- Impact 3.7-6: Conflict with Local Policies and Ordinances

Cultural Resources

- Impact 3.8-1: Cause a Substantial Adverse Change in the Significance of Unique Archaeological Resources
- Impact 3.8-2: Disturb Human Remains

Hazardous Materials, Wildfire, and other Hazards

- Impact 3.9-2: Impair an Adopted Emergency Response Plan or Emergency Evacuation Plan
- Impact 3.9-3: Exacerbate Wildfire Risk as a Result of Installation of Infrastructure

Hydrology and Water Quality

- Impact 3.12-3: Substantially Alter the Existing Drainage Pattern of the Site Resulting in Substantial Flooding, Additional Sources of Polluted Runoff, or Exceedance of Existing Stormwater Infrastructure Capacity

Tribal Cultural Resources

- Impact 3.15-1: Cause a Substantial Adverse Change in the Significance of a Tribal Cultural Resource

6.3 ALTERNATIVES CONSIDERED BUT NOT EVALUATED FURTHER

As described above, State CEQA Guidelines Section 15126.6(c) provides that the range of potential alternatives for the project shall include those that could feasibly accomplish most of the basic objectives of the project and could avoid or substantially lessen one or more of the significant effects. Alternatives that fail to meet the fundamental project purpose need not be addressed in detail in an EIR. (*In re Bay-Delta Programmatic Environmental Impact Report Coordinated Proceedings* (2008) 43 Cal.4th 1143, 1165-1167.)

In determining what alternatives should be considered in the EIR, it is important to acknowledge the objectives of the project, the project's significant effects, and unique project considerations. These factors are crucial to the development of alternatives that meet the criteria specified in Section 15126.6(a). Although, as noted above, EIRs must contain a discussion of "potentially feasible" alternatives, the ultimate determination as to whether an alternative is feasible or infeasible is made by lead agency decision-maker(s). (See PRC Section 21081[a][3].) At the time of action on the project, the decision-maker(s) may consider evidence beyond that found in this EIR in addressing such determinations. The decision-maker(s), for example, may conclude that a particular alternative is infeasible (i.e., undesirable) from a policy standpoint, and may reject an alternative on that basis provided that the decision-maker(s) adopts a finding, supported by substantial evidence, to that effect, and provided that such a finding reflects a reasonable balancing of the relevant economic, environmental, social, and other considerations supported by substantial evidence. (*City of Del Mar v. City of San Diego* (1982) 133 Cal.App.3d 401, 417; *California Native Plant Society v. City of Santa Cruz* (2009) 177 Cal.App.4th 957, 998.)

The EIR should also identify any alternatives that were considered by the lead agency but were rejected during the planning or scoping process and briefly explain the reasons underlying the lead agency's determination.

The following alternatives were considered by the City but not evaluated further in this Draft EIR, and a brief description of the reasons for the City's determination.

6.3.1 Off-Site Alternatives

Off-site alternatives are generally considered in EIRs when one of the means to avoid or eliminate the significant impacts of a project is to develop it in a different available location. Such alternatives are especially appropriate where a proposed project would put a site to uses different than those contemplated in the governing general plan, which presumably reflects land use policies reached after much deliberation and public involvement, and also in instances where there is an ample supply of similarly situated land that could be developed for a project. The existing General Plan land use designation for the project site is Public/Quasi-Public (P/QP), which primarily allows for municipal and governmental facilities. The project site is zoned Planned Development (PD) and allows for agricultural, recreation, and a limited number of other civic and commercial uses. Further, the project site is geographically tied to existing roadways and utility infrastructure due to its proximity to existing and planned residential development.

One off-site location that was considered for the Phillip Road Project is a portion of the Placer Ranch Specific Plan (PRSP) area. The PRSP area includes 2,213 acres in the southern portion of Placer County's Sunset Area. The southern boundary of the PRSP area is contiguous with the existing Roseville City limits, and the northern boundary is defined, in part, by the existing alignment of West Sunset Boulevard west of Fiddyment Road. The PRSP area includes an employment-generating land use known as Campus Park. The PRSP describes this area as follows (Placer County 2019: 04-8):

> As one of Placer Ranch's significant anchors, the Campus Park is a 335-acre job center located adjacent to the university site and Town Center. The land area designated for Campus Park is situated along Placer Parkway, Campus Park Boulevard, and Foothills Boulevard, giving it excellent visibility along major roadway corridors. Office, research and development, commercial/retail, light industrial, and warehousing uses are planned, collectively accommodating approximately 4.5-million square feet.

An off-site location was considered that consists of seven parcels in the northeast corner of the PRSP area, within the Campus Park. The site totals approximately 124 acres. Consistent with the density allowed in the PRSP, the site could accommodate a 0.31 floor area ratio (FAR) and a total development of 1,666,213 square feet. Notably, the Campus

Park site is not planned to accommodate residential land uses and, therefore, it is unknown if residential land uses could be developed on this site. In comparison, the project site includes 176 acres of developable land and a proposed mixed-use development of 664 residential units, 30,084 square feet (sf) of retail uses, 20,925 sf of medical offices, and 1,011,032 sf of innovation center uses. This site is located closer to a major freeway (Highway 65) than the project site; however, the surrounding PRSP area has not been developed yet and, thus, internal roadways (including the planned Placer Parkway) and utility infrastructure are not currently available. Further, the PRSP site is located outside of the Roseville City limits and, thus, is not within the City's jurisdiction or land use authority.

Based on the project applicant's initial project planning to identify viable projects and properties upon which to develop the project, there are no known sites that are sufficient in size to accommodate the project that would not result in most of the significant impacts that would occur with the project. As noted above, one site was considered, but it is not located within the City of Roseville, is not large enough to accommodate the size of development, and existing infrastructure is not available. The project site represents the only available major land area that is reasonably capable of attaining the project objectives. Therefore, alternative locations for the project are not evaluated further in this Draft EIR.

6.4 ALTERNATIVES SELECTED FOR DETAILED ANALYSIS

The following alternatives are evaluated in this Draft EIR.

- Alternative 1: No Project Alternative assumes no development occurs on the project site. The project site would remain in its current condition (undeveloped grazing land).
- Alternative 2: Reduced Footprint and Development Alternative would eliminate proposed development on the northern portion of the project site, which eliminates the need for the bridge across Pleasant Grove Creek and the Pleasant Grove Creek Bypass Channel. This alternative also results in a reduction of development area, compared to the proposed project.
- Alternative 3: Residential-only Alternative would involve development of the project site with residential land uses only, rather than the mix of uses proposed for the project. Specifically, the proposed retail, medical offices, and innovation center uses would not be developed on the project site. Residential land uses would be developed on both the southern and northern portions of the project site and a bridge would be installed (similar to the project), to connect both areas.
- Table 6-1 provides a summary comparison of the alternatives and the proposed project at buildout.

Table 6-1 Summary Comparison of the Alternatives and the Proposed Project at Buildout

Land Use/Project Component	Proposed Project	Alternative 1: No Project Alternative	Alternative 2: Reduced Footprint and Development Alternative	Alternative 3: Residential-only Alternative
Development Type	Mixed Use	No development	Mixed Use	Residential
Retail	30,084 sf	0	30,084 sf	0
Medical offices	20,925 sf	0	20,925 sf	0
Innovation center	1,011,032 sf	0	1,011,032 sf	0
Employees	910–980 employees	0	910–980 employees	0
Residential units	664 units	0	453 units	1,014 units
Residents	1,550–1,650 residents	0	1,078 residents	2,480 residents
Total acreage to be developed	176 acres	0	128 acres	176 acres
Site layout	Northern and southern portions	None	Southern portion only	Northern and southern portions

Notes: sf = square feet.

Source: Data compiled by Ascent in 2026.

Further details on these alternatives, and an evaluation of environmental effects relative to the proposed project, are provided below.

6.4.1 Alternative 1: No Project Alternative

Under Alternative 1, the No Project Alternative, no actions would be taken by the City or applicant and the project site would remain unchanged from current conditions (undeveloped grazing land). The No Project Alternative would not meet the project objectives. However, as required by CEQA, the No Project Alternative is evaluated in this Draft EIR.

Although it is acknowledged that with the No Project Alternative, there would be no discretionary action by the City, and thus no impact, for purposes of comparison with the other action alternatives, conclusions for each technical area are characterized as "impacts" that are greater, similar, or less, to describe conditions that are worse than, similar to, or better than those of the proposed project.

ENVIRONMENTAL IMPACT ANALYSIS

Under the No Project Alternative, the project site would remain in its existing condition, with the continued use of the site as undeveloped agricultural land. No new facilities would be built, and no earthwork or ground-disturbing activities would occur. Further, no construction-related or operational impacts or vehicle trips would be generated. Therefore, impacts under the No Project Alternative would be less compared to the project for the following resources:

- land use and agricultural resources;
- population, employment, and housing;
- transportation and circulation;
- air quality;
- greenhouse gas emissions and climate change;
- noise and vibration;
- biological resources;
- cultural resources;
- hazardous materials, wildfire, and other hazards;
- public services and recreation;
- utilities and service systems;
- hydrology and water quality;
- aesthetics;
- energy; and
- tribal cultural resources.

6.4.2 Alternative 2: Reduced Footprint and Development Area Alternative

Alternative 2, the Reduced Footprint and Development Area Alternative, is designed to reduce the project's operational air quality and greenhouse gas (GHG) impacts, as well as minimize the project's residual impacts (i.e., the degree of impact between baseline conditions and the mitigated project conditions, even if the impact remains below the threshold of significance) to biological resources. This alternative achieves these reductions by eliminating proposed development on the northern portion of the project site, which eliminates the need for the bridge across Pleasant Grove Creek and the Pleasant Grove Creek Bypass Channel. Eliminating proposed development on the northern portion of the project site also results in a reduction of 211 residential units (or 32 percent less) and 472–572 fewer residents (or 30 to 35 percent less) than the proposed project. The 1.9-acre park and the 1-acre bike trail on the northern portion of the project site would also be eliminated. The site plan likely be very similar to the proposed project's design of the southern portion of the project site, although some adjustment would likely be necessary as through access to the northern portion of the project site would no longer be needed. Overall, Alternative 2 would result in the development of 48 fewer acres (or 27 percent less) than the proposed project.

Alternative 2 would still result in the development of the planned Innovation and Commercial component of the project (which would include 30,084 sf of retail uses, 20,925 sf of medical offices, and 1,011,032 sf of innovation center uses), which would generate the need for 910–980 employees, the same as the proposed project.

Implementation of Alternative 2 would meet most of the project objectives but would not meet the objective related to designing a comprehensively planned community with a mix of land uses and a range of residential densities to create a balanced community to the same extent as the proposed project, due to the fact that this alternative includes less residential uses compared to the project. Likewise, because this alternative would result in fewer housing units, it would also not meet objectives related to helping the City meet its Regional Housing Needs Allocation (RHNA) obligations to the same extent as the project. This alternative may also not meet the objective related to the highest and best use of the property because it would cut off the 50-acre northern portion of the project site from near-term development. The future Placer Parkway alignment is adjacent to the west of the northern portion of the project site (Placer Parkway is planned as a major thoroughfare and would not feasibly provide direct site access). The Placer Parkway alignment also precludes any access from the north. The only possible way to provide future access to the site would be by extending the alignment of a future small residential road associated with the Creekview Specific Plan to the site. However, this would limit the level of development achievable at the northern portion of the project site as it would be restricted by the size of infrastructure, including roads and utilities in the Creekview Specific Plan area.

Implementation of Alternative 2 would comply with General Plan policies but not to the same extent as the project. For example, Policy LU1.5 requires the City to promote land use patterns that result in the efficient use of urban lands and preservation of open space, and Policy LU8.7 requires the City to manage growth in such a way to ensure that significant open space areas will be preserved. Alternative 2 would preserve less open space along Pleasant Grove Creek and the Pleasant Grove Creek Bypass Channel, compared to the project. While the northern portion of the project site would not be developed as part of Alternative 2, it could nonetheless be developed as part of a future and separate project.

LAND USE AND AGRICULTURAL RESOURCES

Alternative 2 would result in less ground disturbance and a smaller development footprint as the proposed project. Section 3.1, "Land Use and Agricultural Resources," indicates that the proposed project would result in less-than-significant impacts related to conflicts with plans, policies, and regulations focused on environmental impact minimization, as well as impacts related to conversion of farmland. Although this alternative would affect less Farmland of Local Importance than the project, because the project's impact is less than significant, this alternative would result in a similar impact. Overall, the impact would be similar. *(Similar)*

POPULATION, EMPLOYMENT, AND HOUSING

Like the project, Alternative 2 would still result in the development of the planned Innovation and Commercial component of the project, which would generate the need for 910–980 employees; however, Alternative 2 would result in a reduction of 211 residential units and, thus, an estimated 472–572 fewer residents, compared to the proposed project. Section 3.2, "Population, Employment, and Housing," indicates that the project would result in less-than-significant impacts related to inducement of unplanned population growth. Although this alternative's smaller residential numbers would result in less secondary effects (growth-related) associated with population growth, because the project would result in a less-than-significant impact, the overall impact of this alternative is considered to be similar. *(Similar)*

TRANSPORTATION AND CIRCULATION

Because Alternative 2 would result in less overall development (and no development of the northern portion of the project site), it would result in fewer vehicle trips associated with the reduced amount of residential land use. This would result in a reduction in the total vehicle miles traveled (VMT); however, regarding VMT efficiency (VMT per service population), which is the basis of the threshold of significance for VMT impacts used in Section 3.3, "Transportation and Circulation," the reduction in development area would not likely result a meaningful change in the impact. This is because the land use types and associated vehicle trip types would not change (i.e., although the total amount of development would be less, the VMT efficiency, which relates to the land use type, would be similar). Alternative 2 would, therefore, not be more efficient from a VMT standpoint than the proposed project.

Similar to the project, Alternative 2 would be designed to minimize potential hazards related to design features and to provide adequate emergency access. Despite the reduced level of trips and number of residents, this alternative would still result in the same potential conflicts with General Plan policies related to pedestrian and transit facilities because new employees and residents would be added to a site that does not have continuous sidewalks and is not currently served by public transit. Mitigation Measures 3.3-2 and 3.3-4 would address the construction of continuous sidewalks and provision of adequate transit services, but are not fully enforceable and, thus, it cannot be determined whether these mitigation measures would be implemented. Thus, this alternative would not avoid the project's significant and unavoidable impacts related to pedestrian and transit facilities. Overall, the impact would be similar. *(Similar, and still significant and unavoidable)*

AIR QUALITY

Alternative 2 would involve a smaller area of disturbance and would, therefore, result in fewer construction-related emissions of criteria air pollutants, ozone precursors, and toxic air contaminants (TACs), especially at future planned residential areas adjacent to the northern portion of the project site (although these homes are not currently constructed, it is possible that they could be completed and occupied at the time the northern portion of the project site is under construction). Long-term emissions would also be reduced compared to the project because of the smaller scale of development and fewer vehicle trips. Further, only the southern portion of the project site would be developed. Alternative 2 would require the same mitigation required by the project to reduce long-term operational emissions of ozone precursors as well construction and operational-related health risk exposure. By implementing the same mitigation measures identified for the project, this alternative may be able to achieve additional emissions reductions due to the reduced amount of development. However, because Alternative 2 is still a major development, the actual future tenants are unknown, and buildout or full occupancy of this alternative would occur over the long-term, it may not be able to avoid the project's significant and unavoidable impact related to long-term operational emissions of ozone precursors. Overall, Alternative 2 would result in less emissions of criteria air pollutants, ozone precursors, and TACs, and overall air quality impacts would be less, but this alternative may not avoid the project's significant and unavoidable impact related to long-term operational emissions of ozone precursors. *(Less, but still significant and unavoidable)*

GREENHOUSE GAS EMISSIONS AND CLIMATE CHANGE

Alternative 2 would involve a smaller area of disturbance and would, therefore, result in reduced overall VMT because there would be fewer vehicle trips associated with the reduced amount of residential land use. (Note that total VMT differs from the VMT efficiency metrics used in the VMT analysis). In addition to the reduction in total VMT, the reduction in overall development associated with this alternative would also reduce building energy and energy associated with on-site equipment. . By implementing the same mitigation measures identified for the project, this alternative may be able to achieve additional GHG reduction due to the lower energy demand associated with this alternative's smaller footprint. However, because Alternative 2 is still a major development, the actual future tenants are unknown, buildout or full occupancy of this alternative would occur over the long-term, and the location of the project site poses limitations to transportation demand management strategies, it may not be able to avoid the project's significant and unavoidable GHG impact. Overall impacts related to GHG would be less, but this alternative may not avoid the project's significant and unavoidable GHG impact. *(Less, but still significant and unavoidable)*

NOISE AND VIBRATION

Alternative 2 would involve a smaller area of disturbance and would, therefore, result in lower construction noise levels, especially at future planned residential areas adjacent to the northern portion of the project site (although these homes are not currently constructed, it is possible that they could be completed and occupied at the time the northern portion of the project site is under construction). The proposed project would result in a less-than-significant impact associated with construction noise, and, although this alternative would reduce construction noise, the construction noise impact would be similar. Additionally, construction-related vibration impacts would be similar

to the project because they would still occur near residents of the Creekview Specific Plan area and could still exceed applicable local standards without mitigation. Alternative 2 would require the same mitigation required by the project to reduce construction-related vibration impacts.

Although there may be a slight reduction in noise due to the elimination of development on the northern portion of the project site, the project's impacts would generally be similar. Additionally, the same mitigation measures required for the project would likely apply to Alternative 2 to reduce noise from stationary sources (e.g., backup generators and parking lots).

This alternative would reduce but may not avoid the project's significant and unavoidable traffic noise impact because the southern portion of the project site would still be developed and resulting traffic noise would still be generated, potentially in excess of applicable City of Roseville allowable noise increase standards. All feasible mitigation was applied at the time the Creekview Specific Plan was approved, and the required mitigation has been completed. The existing subdivision north of Blue Oaks Boulevard and west of Westbrook Boulevard is set back 40 feet from the edge of Blue Oaks Boulevard, separated by a landscape buffer, and a 6-foot masonry sound wall was constructed. No additional feasible mitigation is available. Overall, Alternative 2 would result in similar noise impacts, and this alternative would not avoid the project's significant and unavoidable traffic noise impact. *(Similar, and still significant and unavoidable)*

BIOLOGICAL RESOURCES

Impacts of the proposed project on biological resources would, overall, be less than significant with implementation of mitigation measures. Some of the impacts requiring mitigation are associated primarily with the proposed bridge crossing Pleasant Grove Creek and the Pleasant Grove Creek Bypass. Alternative 2 would eliminate the bridge. Therefore, impacts associated with special-status plants, some special-status wildlife species, riparian habitat, some protected wetlands, and wildlife movement corridors would likely be completely avoided by Alternative 2. Complete avoidance of impacts is preferable to mitigation of impacts. Therefore, although Alternative 2 would not avoid a significant impact associated with the project (the project does not result in an unavoidable significant impact to biological resources), the overall impact would be less due to the elimination of the need to mitigate several impacts. *(Less)*

CULTURAL RESOURCES

Alternative 2 would eliminate development of the northern portion of the project site and associated bridge. Therefore, the overall disturbance area would be reduced. The proposed project would result in a potentially significant impact related to currently unknown archaeological resources and potential disturbance of human remains, and mitigation measures are identified to reduce the impacts to a less-than-significant level. Alternative 2 would require similar mitigation to reduce impacts; however, because this alternative results in less ground disturbance, the chance of uncovering an unknown archaeological resource or human remains is somewhat reduced. Overall, the impact is slightly less. *(Less)*

HAZARDOUS MATERIALS, WILDFIRE, AND OTHER HAZARDS

Project-related impacts related to hazardous materials, wildfire, and other hazards are all less than significant after implementation of mitigation measures. There is nothing about the land uses or overall development identified in Alternative 2 that differs from the project in a way that would change the level of impact. Similar mitigation measures would be required for Alternative 2. Overall, impacts related to hazardous materials, wildfire, and other hazards would be similar. *(Similar)*

PUBLIC SERVICES AND RECREATION

Alternative 2 would result in less demand for public services and recreational facilities due to the reduction in residential population. Further, the 1.9-acre park and the 1-acre bike trail on the northern portion of the project site

would not be developed under this alternative. The project would result in less-than-significant impacts related to public services and recreation. Although this alternative's smaller residential numbers would result in reduced demand for public services and recreational facilities, because the project would result in a less-than-significant impact, the overall impact of this alternative is considered to be similar. *(Similar)*

UTILITIES AND SERVICE SYSTEMS

Due to the decreased level of development, Alternative 2 would result in less demand for utility services, including water, wastewater, electricity, and solid waste services. However, because the project would result in less-than-significant impacts related to the provision of these utilities (including construction/extension of infrastructure and adequate capacity), impacts associated with Alternative 2 would generally be similar. *(Similar)*

HYDROLOGY AND WATER QUALITY

Although Alternative 2 would have a smaller overall development footprint as the proposed project and overall less development, the development types would be similar, and construction and operation of this alternative would require compliance with the same water quality regulations as the proposed project. The project includes a proposed bridge across Pleasant Grove Creek and the Pleasant Grove Creek Bypass to access the northern portion of the project site; however, compliance with regulations and standards would minimize potential impacts related to alteration of stormwater and flood flows; therefore, although Alternative 2 would eliminate the bridge, the impact related to potential changes in stormwater and flood flows would generally be similar. The EIR indicates the project-related impacts associated with hydrology and water quality are less than significant after mitigation; impacts associated with Alternative 2 would be similar. *(Similar)*

AESTHETICS

The proposed project's impacts associated with aesthetics, on an individual project basis, are less than significant. However, the project is at the edge of existing development in the area and is adjacent to a protected open space area and would result in a substantial contribution to a cumulative change in character and cumulative increase in light and glare. Although the scale of development and lighting would be similar to the project on the southern portion of the project site, Alternative 2 would eliminate proposed development on the northern portion of the project site, which is adjacent to the protected open space area. This would reduce overall lighting and would provide a substantial setback from the existing open space area. Although this would not avoid the project's contribution to a significant cumulative impact, it would reduce it. Overall, the impact would be less. *(Less)*

ENERGY

The proposed project would result in less-than-significant impacts associated with energy use. Although Alternative 2 would result in less overall development and would create less demand for energy, the land use types would be similar (albeit there would be less residential development) and would be equivalent to the project in terms of energy efficiency. Because the project would result in a less-than-significant impact related to energy, the overall impact of this alternative would generally be similar. *(Similar)*

TRIBAL CULTURAL RESOURCES

Alternative 2 would eliminate development of the northern portion of the project site and associated bridge. Therefore, the overall disturbance area would be reduced. The proposed project would result in a potentially significant impact related to currently unknown Tribal Cultural Resources, and mitigation measures are identified to reduce the impact to a less-than-significant level. Alternative 2 would require similar mitigation to reduce impacts; however, because this alternative results in less ground disturbance, the chance of uncovering an unknown archaeological resource is somewhat reduced. Overall, the impact is slightly less. *(Less)*

6.4.3 Alternative 3: Residential-only Alternative

Alternative 3, the Residential-only Alternative, is designed to reduce the project's significant operational air quality and GHG impacts, as well as the project's significant traffic noise impact. This alternative could achieve these reductions by eliminating the retail, medical offices, and innovation center uses.

Under Alternative 3, the project site would be developed with residential land uses only, rather than the mix of uses proposed for the project. Specifically, the proposed retail, medical offices, and innovation center uses would not be developed on the project site. No employment generating uses would be developed and, thus, no jobs would be created. This alternative would provide a range of housing options, including affordable housing consistent with the City's General Plan and would help the City meet its RHNA obligations, more so that the project would. Up to approximately 1,014 residential units would be constructed on the project site (or 35 pecent more than project), which would accommodate approximately 2,480 new residents (or 35 percent more than project) Residential land uses would be developed on both the southern and northern portions of the project site and a bridge would be installed (similar to the project), to connect both areas.

Due to the increase in residential units, this alternative would include additional park acreage in addition to the project's proposed 1.9-acre park and the 1-acre bike trail, to meet City standards. Overall, Alternative 3 would result in the development of the same total number of acres as the project (176 acres).

Developing the project site with only residential uses would not meet the basic project objective of designing a comprehensively planned community with a mix of land uses to create a balanced community. Nor would this alternative meet the project objectives related to developing a state-of-the-art employment center; creating substantial, permanent employment opportunities; supporting the City's desire to create a job-housing balance; providing high-quality employment generating uses; or providing a mix of land uses and facilities which, taken together, would provide a positive fiscal impact to the City's General Fund. However, this alternative would meet the project objectives related to providing alternative transportation; providing a variety housing options, including affordable housing; helping the City meet its RHNA obligations; utilizing alternative energy sources; locating the project near existing utility infrastructure with anticipated capacity and in an area accessible from existing roads; and minimizing environmental impacts to surrounding areas and other sensitive land uses.

Implementation of Alternative 3 would comply with General Plan policies to a similar extent compared with the project. For example, Policy LU1.5 requires the City to promote land use patterns that result in the efficient use of urban lands and preservation of open space, and Policy LU8.7 requires the City to manage growth in such a way to ensure that significant open space areas will be preserved. Alternative 3 would preserve the same amount of open space along Pleasant Grove Creek and the Pleasant Grove Creek Bypass Channel, compared to the project.

LAND USE AND AGRICULTURAL RESOURCES

Alternative 3 would result in a similar amount of ground disturbance and development footprint as the proposed project. Section 3.1, "Land Use and Agricultural Resources," indicates that the proposed project would result in less-than-significant impacts related to conflicts with plans, policies, and regulations focused on environmental impact minimization, as well as impacts related to conversion of farmland. This alternative would affect the same amount of Farmland of Local Importance as the project would. Overall, the impact would be similar. *(Similar)*

POPULATION, EMPLOYMENT, AND HOUSING

Alternative 3 would not include development of the planned Innovation and Commercial component of the project and, thus, no jobs would be created. Under this alternative, up to approximately 1,014 residential units would be constructed on the project site (or 35 percent more than project), which would accommodate approximately 2,480 new residents (or 35 percent more than project). A range of housing options, including affordable housing consistent with the City's General Plan, would be developed and would help the City meet its RHNA obligations, more so that the project would; however, this alternative would not help the City create a job-housing balance. Section 3.2,

"Population, Employment, and Housing," indicates that the project would result in less-than-significant impacts related to inducement of unplanned population growth. Because this alternative's larger residential numbers would result in increased secondary effects (growth-related) associated with population growth, the overall impact of this alternative would be greater. *(Greater)*

TRANSPORTATION AND CIRCULATION

Although residential land uses are typically associated with fewer vehicle trips (and fewer truck trips), compared to a mixed-use project, Alternative 3 would likely result in increased VMT given the project residents' longer commutes to work and services. Similar to the project, Alternative 3 would be designed to minimize potential hazards related to design features and to provide adequate emergency access. This alternative, however, would still result in the same potential conflicts with General Plan policies related to pedestrian and transit facilities because new residents (more than the project) would be added to a site that does not have continuous sidewalks and is not currently served by public transit. Mitigation Measures 3.3-2 and 3.3-4 would address the construction of continuous sidewalks and provision of adequate transit services, but are not fully enforceable and, thus, it cannot be determined whether these mitigation measures would be implemented. Thus, this alternative would not avoid the project's significant and unavoidable impacts related to pedestrian and transit facilities. Overall, the impact would be greater. *(Greater, and still significant and unavoidable)*

AIR QUALITY

Because the overall development footprint and project construction activities (e.g., site preparation, off-road equipment, material delivery, worker commute trips, building construction, paving, architectural coating) of Alternative 3 would be similar to the project, construction-related emissions of criteria air pollutants, ozone precursors, and TACs would be similar to those of the project. Similar to the project, implementation of Alternative 3 would result in long-term operational emissions from area-wide sources and mobile sources associated with residences. Long-term operational emissions of some air pollutants would be reduced compared to the project due to the elimination of the retail, medical offices, and innovation center uses. However, this alternative would likely increase operational emissions of criteria air pollutants and ozone precursors from area sources (e.g., landscaping equipment, consumer products) as well as vehicle exhaust from increased passenger cars, and off-gassing from architectural coatings, which could exceed PCAPCD significance thresholds and result in a new significant impact, which may or may not be mitigable. Alternative 3 would require the implementation of Mitigation Measures 3.4-3a through 3.4-3c, Mitigation Measure 3.4-3f, and Mitigation Measures 3.4-4a and 3.4-4b, as required by the project to reduce long-term operational emissions of ozone precursors as well construction and operational-related health risk exposure. Overall, Alternative 3 would result in greater emissions of criteria air pollutants and ozone precursors, and overall air quality impacts would be greater. In addition, this alternative would not avoid the project's significant and unavoidable impact related to long-term operational emissions of ozone precursors. *(Greater, and still significant and unavoidable)*

GREENHOUSE GAS EMISSIONS AND CLIMATE CHANGE

Construction activities associated with Alternative 3 would be similar to those associated with the project. Because the overall development footprint of Alternative 3 is similar to that of the project, the maximum level of GHG emissions generated by this alternative would likely not exceed the PCAPCD bright-line threshold of 10,000 $MTCO_2e$/year. Operational GHG emissions would be generated by vehicle trips to and from the project site, electricity usage, water usage, wastewater and solid waste generation, and area sources such as landscaping equipment. Due to the elimination of the retail, medical offices, and innovation center uses, operational building energy and energy associated with on-site equipment associated with these uses would also be eliminated. However, without the planned Innovation and Commercial component of the project, Alternative 3 would likely result in increased VMT and transportation-related emissions given the project residents' longer commutes to work and services. While Alternative 3 would require the implementation of Mitigation Measures 3.5-1a, 3.5-1d, and 3.5-2a required by the project to reduce GHGs, it may not be able to avoid the project's significant and unavoidable GHG impact because Alternative 3

is still a major development, buildout or full occupancy of this alternative would occur over the long-term, and the location of the project site poses limitations to transportation demand management strategies. Overall impacts related to GHG would be similar, and this alternative may not avoid the project's significant and unavoidable GHG impact. *(Similar, and still significant and unavoidable)*

NOISE AND VIBRATION

Because the overall development footprint of Alternative 3 is similar to the project, construction-related noise would be similar. In addition, construction-related vibration impacts would be similar to the project because they would still occur near residents of the Creekview Specific Plan area and could still exceed applicable local standards without mitigation. Alternative 3 would require the same mitigation required by the project to reduce construction-related vibration impacts.

Due to the elimination of the retail, medical offices, and innovation center uses, operational noise would be reduced because there would be no backup generators and no parking lots. This alternative would reduce but may not avoid the project's significant and unavoidable traffic noise impact because the project site would still be developed (albeit with residential land uses) and resulting traffic noise would still be generated, potentially in excess of applicable City of Roseville allowable noise increase standards. All feasible mitigation was applied at the time the Creekview Specific Plan was approved, and the required mitigation has been completed. The existing subdivision north of Blue Oaks Boulevard and west of Westbrook Boulevard is set back 40 feet from the edge of Blue Oaks Boulevard, separated by a landscape buffer, and a 6-foot masonry sound wall was constructed. No additional feasible mitigation is available. Overall, Alternative 3 would result in similar noise impacts, and this alternative would not avoid the project's significant and unavoidable traffic noise impact. *(Similar, and still significant and unavoidable)*

BIOLOGICAL RESOURCES

Because the area of soil disturbance associated with Alternative 3 would be substantially similar to the proposed project, and because project-related impacts to biological resources are associated primarily with project construction, Alternative 3 would generally result in similar impacts and would require similar mitigation measures compared to those of the project. Overall, impacts related to biological resources would be similar. *(Similar)*

CULTURAL RESOURCES

Similar to biological resources, project-related impacts to cultural resources are associated with ground-disturbing construction activities. Because the area of soil disturbance associated with Alternative 3 would be similar to the project, impacts related to cultural resources would be similar and would require similar mitigation measures compared to those of the project. Overall, impacts to cultural resources would be similar. *(Similar)*

HAZARDOUS MATERIALS, WILDFIRE, AND OTHER HAZARDS

Project-related impacts related to hazardous materials, wildfire, and other hazards are all less than significant after implementation of mitigation measures. Similar mitigation measures would be required for Alternative 3. Due to the elimination of the retail, medical offices, and innovation center uses, the potential for impacts to residents and the environment associated with routine transport or accidental release of hazardous materials may be reduced but would not be eliminated. Residential land uses would still involve the use of typical household-type cleaning, maintenance, and landscaping products formulated with hazardous materials (including fuels, cleaners and degreasers, solvents, paints, lubricants, adhesives, sealers, and pesticides/herbicides). Overall, impacts related to hazardous materials, wildfire, and other hazards would be similar. *(Similar)*

PUBLIC SERVICES AND RECREATION

Alternative 3 would result in increased demand for public services and recreational facilities due to the increase in residential population. Further, this alternative would include additional park acreage in addition to the project's proposed 1.9-acre park and the 1-acre bike trail, to meet City standards. The project would result in less-than-significant impacts related to public services and recreation. Because this alternative's larger residential numbers would result in increased demand for public services and recreational facilities, and because it is unknown whether existing City services could accommodate this increased demand, the overall impact of this alternative is considered to be greater. *(Greater)*

UTILITIES AND SERVICE SYSTEMS

Alternative 3 would eliminate the retail, medical offices, and innovation center uses, and would increase the amount of residential use. Due to this change, Alternative 3 may decrease or result in similar demands overall for utility services, including water, wastewater, electricity, and solid waste services. However, because the project would result in less-than-significant impacts related to the provision of these utilities (including construction/extension of infrastructure and adequate capacity), impacts associated with Alternative 3 would generally be similar. *(Similar)*

HYDROLOGY AND WATER QUALITY

Alternative 3 would have a similar overall development footprint as the project, and construction and operation associated with this alternative would require compliance with the same water quality regulations as the project. Also similar to the project, this alternative includes a proposed bridge across Pleasant Grove Creek and the Pleasant Grove Creek Bypass to access the northern portion of the project site; however, compliance with regulations and standards would minimize potential impacts related to alteration of stormwater and flood flows. The EIR indicates the project-related impacts associated with hydrology and water quality are less than significant after mitigation; impacts associated with Alternative 3 would be similar. *(Similar)*

AESTHETICS

The proposed project's impacts associated with aesthetics, on an individual project basis, are less than significant. However, the project is at the edge of existing development in the area and is adjacent to a protected open space area and would result in a substantial contribution to a cumulative change in character and cumulative increase in light and glare. Although the retail, medical offices, and innovation center uses would not be developed and more residential uses would be developed in their place, overall, the development of the site would be mostly consistent with the size and scale of the proposed project. Lighting would also be substantially similar. This would not avoid the project's contribution to significant cumulative impacts related to visual character and quality, and light and glare. Overall, the impact would be similar. *(Similar)*

ENERGY

Alternative 3 would eliminate the retail, medical offices, and innovation center uses, and would increase the amount of residential use. Due to this change, Alternative 3 may decrease or result in similar demands overall for energy and would be equivalent to the project in terms of energy efficiency. Because the project would result in a less-than-significant impact related to energy, the overall impact of this alternative would generally be similar. *(Similar)*

TRIBAL CULTURAL RESOURCES

Project-related impacts to Tribal Cultural Resources would be reduced to a less-than-significant level with implementation of mitigation measures. Impacts to Tribal Cultural Resources are generally tied to a project's ground-disturbing construction activities. Alternative 3 would have a similar development footprint as the proposed project and would, therefore, result in the same level of impact and would require the same mitigation measures compared to those of the proposed project. Impacts to Tribal Cultural Resources would be similar. *(Similar)*

6.5 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

Because the No Project Alternative (described above in Section 6.4.1) would avoid all adverse impacts resulting from construction and operation of the Phillip Road Project analyzed in Chapter 3, it is the environmentally superior alternative. However, the No Project Alternative would not meet the objectives of the project as presented above in Section 6.2. When the environmentally superior alternative is the No Project Alternative, the State CEQA Guidelines (Section 15126.6[e][2]) require selection of an environmentally superior alternative from among the other action alternatives evaluated.

6.5.1 Ability to Meet Project Objectives

Implementation of Alternative 2 would meet most of the project objectives but would not meet the objective related to designing a comprehensively planned community with a mix of land uses and a range of residential densities to create a balanced community to the same extent as the proposed project, due to the fact that this alternative includes less residential uses compared to the project. Likewise, because this alternative would result in fewer housing units, it would also not meet objectives related to helping the City meet its RHNA obligations to the same extent as the project. This alternative may also not meet the objective related to the highest and best use of the property because it would cut off the 50-acre northern portion of the project site from near-term development.

Similar to Alternative 2, implementing Alternative 3 would also not meet the basic project objective of designing a comprehensively planned community with a mix of land uses to create a balanced community because only residential land uses would be developed. Nor would this alternative meet the project objectives related to developing a state-of-the-art employment center; creating substantial, permanent employment opportunities; supporting the City's desire to create a job-housing balance; providing high-quality employment generating uses; or providing a mix of land uses and facilities which, taken together, would provide a positive fiscal impact to the City's General Fund.

6.5.2 Ability to Reduce Project Impacts

As shown in Table 6-2, impacts associated with Alternative 2 would be less than or similar to the proposed project and may reduce (but would not avoid) the project's significant and unavoidable impacts related to transportation and circulation (pedestrian and transit facilities), air quality, GHG, and traffic noise. This is, in part, because the project's mitigation measures for transportation and circulation (pedestrian and transit facilities) impacts, while they would be effective if implemented, are not fully enforceable by the City. In addition, while mitigation measures would reduce air quality and GHG impacts, the actual future tenants are unknown, the exact onsite emissions reductions cannot be quantified, and it cannot be guaranteed that air quality and GHG emissions would be reduced to the necessary levels. Finally, like the project, there are no additional feasible mitigation measures that would reduce traffic noise

Impacts associated with Alternative 3 would be similar to or greater than the proposed project. Like Alternative 2, Alternative 3 may reduce (but would not avoid) the project's significant and unavoidable impacts because the project site would still be developed and it is unknown if mitigation measures (if available) would sufficiently reduce impacts related to transportation and circulation (pedestrian and transit facilities), air quality, GHG, and traffic noise. Further, while this potential alternative may reduce some of the impacts of the project, it could result in greater impacts related to VMT, operational emissions of criteria air pollutants and ozone precursors, and demands on public services. Because it would not substantially reduce the project's significant impacts and may result in greater impacts for some resource areas, Alternative 3 is not the environmentally superior alternative.

Because Alternative 2 would be developed on a smaller project footprint (and would reduce the amount of residential land use) compared to the project, impacts related to air quality, GHGs, biological resources, cultural resources, aesthetics, and Tribal cultural resources would be reduced. However, because Alternative 2 would include the same land uses as the project (innovation and commercial as well as residential), it would generate similar impacts related to land and use and agricultural resources; population, housing, and employment; transportation and

circulation; noise and vibration; hazardous materials, wildfire, and other hazards; public services and recreation; utilities and service systems; hydrology and water quality; and energy. Thus, Alternative 2 would not avoid the project's significant and unavoidable impacts related to transportation and circulation, air quality, GHG, and traffic noise. Nevertheless, because it would reduce the significant impacts associated with the project, Alternative 2 is considered the environmentally superior alternative.

Table 6-2 Summary of Environmental Effects of the Alternatives Relative to the Proposed Phillip Road Project

Environmental Topic	Proposed Project	Alternative 1: No Project Alternative	Alternative 2: Reduced Footprint and Development Alternative	Alternative 3: Residential-only Alternative
Land Use and Agricultural Resources	LTS	Less	Similar	Similar
Population, Housing, and Employment	LTS	Less	Similar	Greater
Transportation and Circulation	SU	Less	Similar, and still SU	Greater, and still SU
Air Quality	SU	Less	Less, but still SU	Greater, and still SU
Greenhouse Gas Emissions and Climate Change	SU	Less	Less, but still SU	Similar, and still SU
Noise and Vibration	SU	Less	Similar, and still SU	Similar, and still SU
Biological Resources	LTS/M	Less	Less	Similar
Cultural Resources	LTS/M	Less	Less	Similar
Hazardous Materials, Wildfire, and other Hazards	LTS/M	Less	Similar	Similar
Public Services and Recreation	LTS	Less	Similar	Greater
Utilities and Service Systems	LTS	Less	Similar	Similar
Hydrology and Water Quality	LTS/M	Less	Similar	Similar
Aesthetics	LTS	Less	Less	Similar
Energy	LTS	Less	Similar	Similar
Tribal Cultural Resources	LTS/M	Less	Less	Similar

Notes: LTS = less than significant; LTS/M = less than significant with mitigation; SU = significant and unavoidable.

Source: Data compiled by Ascent in 2026.