
6. Alternatives

6.1 Purpose

Section 15126.6(a) of the State CEQA Guidelines requires that an EIR describe a range of reasonable alternatives to a project or its location that would feasibly attain most of the project's basic objectives but would avoid or substantially lessen any of the significant effects, and that the EIR evaluate the comparative merits of the alternatives. An EIR need not describe or evaluate the environmental effects of alternatives in the same level of detail as the effects of the proposed project; however, the document must include enough information to allow meaningful evaluation, analysis, and comparison with the proposed project.

An EIR need not consider every conceivable alternative to a project. Rather, a range of potentially feasible alternatives, governed by the "rule of reason," must be considered. This is intended to foster informed decision making and public participation (State CEQA Guidelines, Section 15126.6[f]). The State CEQA Guidelines recommend that an EIR briefly describe the rationale for selecting the alternatives to be discussed, identify any alternatives that the lead agency considered but rejected as infeasible, and briefly explain the reasons for the lead agency's determination (State CEQA Guidelines, Section 15126.6[c]).

CEQA requires that a no project alternative be evaluated (State CEQA Guidelines, Section 15126.6[e]). In addition, the EIR must identify an environmentally superior alternative among the alternatives considered, defined as the alternative that would result in the least adverse environmental impacts on a project site and affected environment. If the no project alternative is found to be environmentally superior, the EIR must also identify an environmentally superior alternative among the other alternatives.

6.2 Factors Considered in Selection of Alternatives

Consistent with Section 15126.6(c) of the State CEQA Guidelines, the Town of Loomis (Town or Loomis) considered the following factors in developing the range of reasonable alternatives to the proposed project:

- The extent to which the alternative would accomplish the project's objectives
- The feasibility of the alternative
- Avoidance or substantial reduction of significant effects

Primary consideration was given to alternatives that would reduce significant impacts while still meeting most project objectives. Alternatives that would have the same or greater impacts compared to the proposed project, or that would not meet most of the project objectives, were rejected from further consideration (State CEQA Guidelines, Section 15126.6[a]).

6.2.1 Ability of the Alternative to Attain Most Project Objectives

Potential alternatives were identified and evaluated relative to the objectives of the proposed project. For the purpose of the alternative's analysis under CEQA, project objectives may not be defined so narrowly that the range of alternatives is unduly constrained.

Applicant Objectives

The project applicant provided the following objectives for the proposed project:

- Construct and operate a new Costco warehouse that serves the local community with goods and services not only from nationally known businesses, but also from regional and local businesses.
- Reduce energy consumption by incorporating passive lighting into building design; using computer-controlled monitoring equipment and high-efficiency heating, ventilation, and air conditioning (HVAC) equipment; and promoting energy efficiencies that exceed state and federal code requirements.

- Provide a Costco warehouse in a location that is convenient for Costco members, the community, and employees to reach for shopping and work.
- Increase employment opportunities and contribute to the Town of Loomis's (Town's) job/housing balance.
- Provide a state-of-the-art Costco warehouse to serve Costco's membership in the greater Loomis area.
- Develop a fueling station and tire facility to serve customers of the retail warehouse.
- Enhance the area by constructing a warehouse that has an architectural design unique to Loomis, is sensitive to the adjacent community and future developments, and is compatible with the need for a new warehouse.
- Minimize circulation conflicts between automobiles and pedestrians.
- Plan and design for public transit access.
- Provide a Costco warehouse in a location served by adequate existing infrastructure, including roadways and utilities.
- Develop a Costco warehouse large enough to accommodate all uses and services that Costco provides to its members elsewhere.

6.2.1.1 Town of Loomis Objectives

- Locate warehouse retail uses and a fueling station near existing interchanges to minimize impacts on Loomis. (General Plan Goal 6)
- Locate warehouse retail uses and a fueling station so as not to conflict with the character, scale, and architecture of the historic central business district.
- Locate warehouse retail on land sufficient to provide the necessary facilities for these types of uses.
- Improve Loomis's commercial base to increase municipal revenues through increased retail sales taxes as well as employee spending and provide a wider range of goods and services for local residents, in addition to encouraging commercial uses near the freeway.
- Expand the space available for integrated retail sales of goods and services, and fuel in Loomis.

6.2.2 Feasibility of the Alternatives

CEQA generally defines "feasible" as "capable of being accomplished in a successful manner within a reasonable period of time, taking into account environmental, social, technological, and legal factors." Alternatives were evaluated according to the "rule of reason" and general feasibility criteria suggested by State CEQA Guidelines Section 15126.6 as follows:

The range of alternatives required in an EIR is governed by a "rule of reason" that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice. The alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the project. Of those alternatives, the EIR need examine in detail only the ones that the lead agency determines could feasibly attain most of the basic objectives of the project. The range of feasible alternatives shall be selected and discussed in a manner to foster meaningful public participation and informed decision making.

The inclusion of an alternative in an EIR does not necessarily mean that the alternative is feasible; rather, it indicates that the lead agency's staff has determined that the alternative is potentially feasible. This analysis considered the following criteria (State CEQA Guidelines, Section 15126.6[f][1]):

- suitability of the site or alternative site;
- the alternative's economic viability;
- availability of infrastructure;
- consistency of the alternative with the General Plan, zoning, and other plans and regulatory limitations; and
- the effect of applicable jurisdictional boundaries.

According to the website for Costco's real estate advisory services, Costco is seeking locations with populations in excess of 200,000 people. The optimal site size is 16 acres. Depending on configuration and location, this will accommodate a 148,000 square-foot building with 850 parking stalls and a fueling station (Northwest Atlantic 2018).

6.2.3 Avoidance or Substantial Reduction of Significant Effects

The evaluation of alternatives must also account for the potential of the alternative to avoid or substantially lessen any of the significant effects of the proposed project, as identified in this EIR. The potential environmental effects of the proposed project are summarized in the Executive Summary of this EIR and include significant and unavoidable traffic impacts for all Project Driveway Access Options and a significant unavoidable impact to oak woodlands if Option 1B or 1C were selected (Granite Drive Extension).

6.3 Alternatives Removed from Consideration

CEQA Section 15126.6(f)(2) requires that the lead agency consider alternative locations if using an off-site location would avoid or lessen any of the significant effects of the project. Only locations that would avoid or substantially lessen any of the project's significant effects need be considered for inclusion in the EIR.

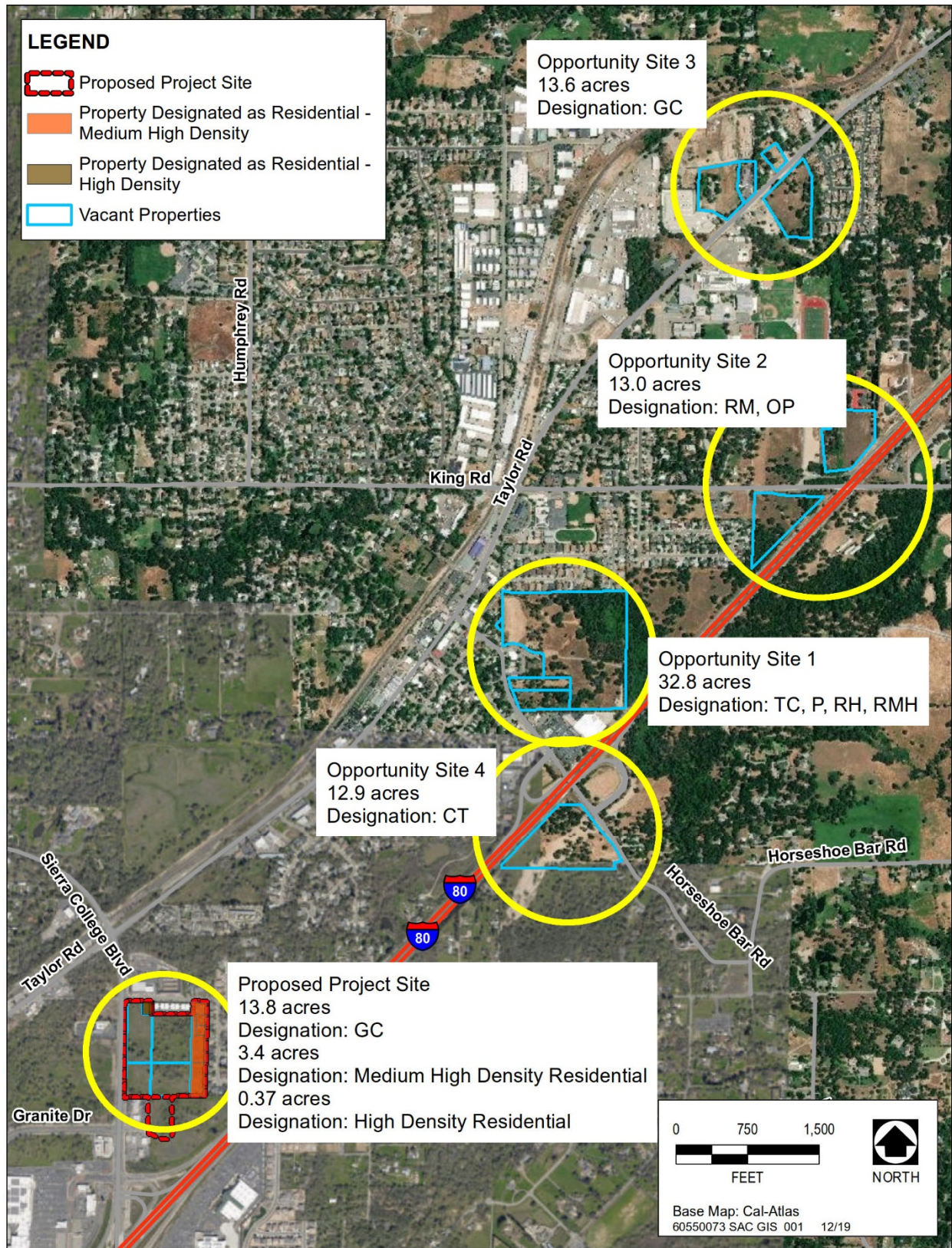
Four locations in the Town of Loomis other than the project site, referred to as "opportunity sites," contain vacant land of similar size to accommodate the project, are zoned or designated for commercial use by the General Plan, and are served by roadways with freeway access (Figure 6-1). For each opportunity site, the following discussion analyzes the site's suitability based on consistency with the General Plan, availability and adequacy of municipal infrastructure, the ability of the alternative site to avoid or lessen environmental effects of the project, feasibility of the alternative site, and ability to accomplish project objectives at the alternative site. For the reasons outlined below, construction and operation of the proposed project at these opportunity sites would not be feasible.

6.3.1 Opportunity Site 1

Opportunity Site 1 is 32.8 acres and consists of nine vacant parcels designated by the General Plan for Town Center Commercial (TC), Public/Quasi Public (P), Residential High Density (RH), and Residential Medium High Density (RMH). Of this total, approximately 5 acres is designated as Town Center Commercial. Regional highway access to Opportunity Site 1 is provided by Interstate 80 (I-80) and its exit at Horseshoe Bar Road, which provides local access to Opportunity Site 1.

- *Site suitability/consistency with the Town of Loomis General Plan*—Placement of warehouse retail uses at Opportunity Site 1 would not be consistent with goal 3 of the General Plan's Community Design Element that are directed toward designing projects that fit their context in terms of building form, siting, and massing. A Costco warehouse store has a much greater building height and mass than the one- and two-story wood structures that characterize existing development in the historical downtown commercial district.
- *Availability and adequacy of municipal infrastructure*—All needed municipal services are available at Opportunity Site 1. However, Horseshoe Bar Road is a two-lane undivided roadway and the I-80 interchange operates below accepted levels of service (LOS). Horseshoe Bar Road is one of the Core Area improvements identified in the General Plan's Circulation Element Update. Improvements called for in the Circulation Element at the Horseshoe Bar Road interchange include four new roundabouts, construction of a new frontage road connecting King Road and Horseshoe Bar Road just north of the southbound off-ramp with I-80, and extension of a new roadway connecting to Webb Street. However, no date has been set for constructing the needed improvements (Town of Loomis 2016). Placing the proposed project at this location would further reduce LOS at the Horseshoe Bar Road I-80 interchange until the identified improvements are in place and operating.

The selection of Opportunity Site 1 would not be consistent with Policy 1 of the Public Services, Facilities and Finance Element that calls for Loomis to work toward achieving and maintaining acceptable levels of municipal services including public safety, roadway maintenance, and administrative services. In contrast, while improvements are needed along surface roads, the project site is served by an improved interchange of I-80 at Sierra College Boulevard that operates at adequate levels of service.



Source: Data compiled by AECOM in 2018

Figure 6-1. Proposed Project Site and Alternative Opportunity Sites

- *Avoidance or lessening of environmental effects of the project*—Development at Opportunity Site 1 would have impacts similar to those of the proposed project. Opportunity Site 1 is heavily wooded, vacant land that is bisected by a riparian drainage. While larger in size than the project site, in order to meet Town policy for setbacks from the drainage the actual developable area is constrained; therefore, a loss of open space and removal of trees would occur similar to the proposed project. Opportunity Site 1 is approximately 7.5 miles northeast of the existing Roseville Costco warehouse. Although the number of vehicular trips would be the same as under the proposed project, these trips would have a greater impact at Opportunity Site 1 because the interchange providing access to the two locations are very different. Horseshoe Bar Road is a narrow, two-lane road and the I-80/Horseshoe Bar Road interchange is a rural design that already operates below accepted LOS (LOS F for the eastbound ramps during a.m. and p.m. weekday conditions). In comparison, Sierra College Boulevard is an improved arterial road with two travel lanes each direct and dedicated turn pockets. The I-80 Sierra College Boulevard interchange is fully improved and the freeway ramps at I-80 currently operate at acceptable levels of service: LOS B for both ramps during the a.m. peak hour and LOS B (westbound ramp) and LOS C (eastbound ramp) during the p.m. peak hour.
- *Feasibility*—The parcels that make up Opportunity Site 1 would have to be acquired by the project applicant, which would require negotiations between a willing seller(s) and on mutually agreeable terms. As a result, development at this location is less feasible than development at the proposed project site and considered speculative.
- *Ability to accomplish project objectives*—Development at Opportunity Site 1 would not meet the following project objectives:
 - Provide a Costco warehouse in a location served by adequate existing infrastructure, including roadways and utilities. (Opportunity Site 1 is accessed by Horseshoe Bar Road interchange of I-80 which is operating below acceptable levels of service).
 - Locate warehouse retail on land sufficient to provide the necessary facilities for these types of uses (Only 5 acres currently designated for commercial).
 - Locate warehouse retail uses so as not to conflict with the character, scale, and architecture of the historic central business district. (The most direct route to the Opportunity site from Roseville Costco would place motorists on Taylor Road traveling north through downtown to reach Horseshoe Bar Road.)¹
 - Locate warehouse retail on land sufficient to provide the necessary facilities for these types of uses.

Conclusion: For the forgoing reasons the Town deems Opportunity Site 1 infeasible.

6.3.2 Off-Site Location at Opportunity Site 2

Opportunity Site 2 is 13.0 acres and consists of two vacant parcels bisected by King Road. The northern parcel, north of King Road, is designated for Office and Professional (O/P) land uses while the southern parcel, south of King Road, is designated for medium density residential use (RM). The O/P designation is intended for general business, professional, and medical offices. The RM designation allows residential uses at densities ranging from two to six dwelling units per acre. King Road provides local access to the site, with regional highway access provided by I-80 and its exit at Horseshoe Bar Road.

- *Site suitability/consistency with the Town of Loomis General Plan*—This location consists of two noncontiguous parcels that are not conducive to a warehouse retail format, which requires a minimum land area (16 acres) for planning purposes (i.e., large enough to accommodate the minimum square footage required for the warehouse and parking) and contiguous parcels as the warehouse structure, parking lot, and fueling station needs to be contained on one site.
- *Availability and adequacy of municipal infrastructure*—All necessary municipal services are available at Opportunity Site 2. As at Opportunity Site 1, regional access is provided by I-80 and its exit at Horseshoe Bar Road, an interchange that operates below acceptable LOS. If a warehouse retail use were sited at this location, vehicular traffic would travel through the historic downtown to access the property from I-80, which is not consistent with policies of the General Plan's Circulation Element that are directed toward reducing through trips on Taylor Road through the downtown historic core.

¹ The land use goals and policies of the General Plan are all oriented toward maintaining this historical arrangement of land uses, because the Town recognizes the importance of the land use pattern in determining community character.

- *Avoidance or lessening of environmental effects of the project*—Development at Opportunity Site 2 would have impacts similar to those of the proposed project. The Opportunity Site 2 property is wooded, vacant land; therefore, a loss of open space and removal of trees would occur at this property. Opportunity Site 2 is approximately 7 miles northeast of the existing Roseville Costco warehouse. Although the number of vehicular trips would be the same as under the proposed project, these trips would have a greater impact at Opportunity Site 2 because regional access is provided by I-80 and its Horseshoe Bar Road ramps. Horseshoe Bar Road is a narrow, two-lane road and the I-80 interchange at Horseshoe Bar Road is a rural design that operates below accepted LOS (LOS F for the eastbound ramps during a.m. and p.m. weekday conditions). In comparison, Sierra College Boulevard is a four-lane road with dedicated turn pockets and a center median with capacity to accommodate additional traffic. Existing operating conditions at the Sierra College Boulevard ramps with I-80 are in the acceptable range: LOS B for both ramps during the a.m. peak hour and LOS B (westbound ramp) and LOS C (eastbound ramp) during the p.m. peak hour.
- *Feasibility*—The project applicant does not own the site. The parcels that make up Opportunity Site 2 would have to be acquired by the project applicant, which would require negotiations between willing seller(s) and on mutually agreeable terms. As a result, development at this location is less feasible than development at the proposed project site and considered speculative.
- *Ability to accomplish project objectives*—Development at Opportunity Site 2 would not meet the following project objectives:
 - Provide a Costco warehouse in a location that is convenient for Costco members, the community, and employees to reach for shopping and work. (Opportunity Site 2 would take access from Horseshoe Bar Road, which is operating below Town standards for level of service.)
 - Provide a Costco warehouse in a location served by adequate existing infrastructure, including roadways and utilities. (Opportunity Site 2 would increase traffic on Taylor Road through the downtown which is not consistent with town policy to reduce regional trips).
 - Locate warehouse retail on land sufficient to provide the necessary facilities for these types of uses. (Opportunity Site 2 contains 7.7 acres designated as residential medium density and 5.3 acres designated office and professional).
 - Locate warehouse retail uses and a fueling station so as not to conflict with the character, scale, and architecture of the historic central business district. (The most direct route to the Opportunity site from Roseville Costco would place motorists on Taylor Road traveling north through downtown to reach Horseshoe Bar Road.)

Conclusion: For the forgoing reasons the Town deems Opportunity Site 2 infeasible.

6.3.3 Off-Site Location at Opportunity Site 3

Opportunity Site 3 is 13.6 acres and represents four noncontiguous parcels in the northern part of Loomis. The four parcels are designated for General Commercial (GC) use and are adjacent to a self-storage facility and immediately south of the railroad tracks. Taylor Road provides local access to Opportunity Site 3, while regional access is provided by I-80 and its exit at Horseshoe Bar Road.

- *Site suitability/consistency with the Town of Loomis General Plan*—Placement of warehouse retail uses along Taylor Road at the northern gateway to the downtown (Opportunity Site 3) would not be consistent with policy 3 of the General Plan's Community Design Element that is directed toward designing projects that fit their context in terms of building form, siting, and massing. A Costco warehouse store has a much greater building height and mass than the one- and two-story wood structures that characterize existing development in the historic downtown commercial district. Further, Opportunity Site 3 consists of noncontiguous parcels totaling 13.6 acres when combined, which is not conducive to a warehouse retail use that ideally is 16 acres of contiguous land (i.e., large enough to accommodate the minimum square footage required for the warehouse) for site planning.
- *Availability and adequacy of municipal infrastructure*—All needed municipal services are available at Opportunity Site 3. However, using Taylor Road for access would carry vehicular trips through downtown Loomis. One of the primary goals of the General Plan's Circulation Element Update is to remove "through traffic" in the downtown area. Further, Horseshoe Bar Road is a narrow, two-lane road and the I-80 interchange operates below accepted LOS (LOS F for the eastbound ramps during a.m. and p.m. weekday conditions). In comparison, Sierra College Boulevard is a four-lane road with dedicated turn pockets and a center median with capacity to accommodate additional traffic. Existing operating conditions at the Sierra College Boulevard ramps with I-80 are in the

acceptable range: LOS B for both ramps during the a.m. peak hour and LOS B (westbound ramp) and LOS C (eastbound ramp) during the p.m. peak hour.

- *Avoidance or lessening of environmental effects of the project*—Development at Opportunity Site 3 would have impacts similar to those of the proposed project. The Opportunity Site 3 property is heavily wooded, vacant land; therefore, a loss of open space and removal of trees would occur if developed, like development of the project site. Traffic impacts would be equal to or greater than those of the proposed project because while the number of vehicular trips would be identical, but the roadways accessing to the two locations are very different. Opportunity Site 3 is approximately 5.5 miles southwest of the existing Roseville Costco warehouse with access taken from Taylor Road. The presence of at-grade railroad crossings at King Road, Webb Street, and Sierra College Boulevard combined with close spacing (about 1,000 feet) of the railroad crossings at Webb Street and King Road could result in traffic problems if a slow moving or stopped train simultaneously blocks the Webb Street and King Road at-grade crossings.
- *Feasibility*—The non-contiguous parcels that make up Opportunity Site 3 would have to be acquired by the project applicant, which would require multiple negotiations between willing sellers and on mutually agreeable terms. Moreover, the land that divides the parcels would have to be acquired to make the parcels contiguous for development purposes which is not feasible. As a result, development at this location is likely less feasible than development at the proposed project site and considered speculative.
- *Ability to accomplish project objectives*—Development of Opportunity Site 3 would not meet basic project objectives. With selection of this alternative, the following project objectives would not be met:
 - Provide a Costco warehouse in a location that is convenient for Costco members, the community, and employees to reach for shopping and work.
 - Provide a Costco warehouse in a location served by adequate existing infrastructure, including roadways and utilities.
 - Develop a Costco warehouse large enough to accommodate all uses and services that Costco provides to its members elsewhere.
 - Locate warehouse retail uses and a fueling station near existing interchanges to minimize impacts on Loomis. (General Plan Goal 6)
 - Locate warehouse retail uses and a fueling station so as not to conflict with the character, scale, and architecture of the historic central business district.
 - Locate warehouse retail on land sufficient to provide the necessary facilities for these types of uses.
 - Improve Loomis's commercial base to increase municipal revenues through increased retail sales taxes as well as employee spending and provide a wider range of goods and services for local residents, in addition to encouraging commercial uses near the freeway.

Conclusion: For the forgoing reasons the Town deems Opportunity Site 3 infeasible.

6.3.4 Off-Site Alternative Suggested by the City of Rocklin

In a comment on the Draft EIR, the City of Rocklin suggested an off-site alternative for consideration on the south side of I-80 at Horseshoe Bar Road. The site is 12.9 acres of land for Tourist/Destination Commercial (CT). For the purposes of this analysis, regional access is assumed to be provided by I-80 and its exit at Horseshoe Bar Road. Local access would likely have to be added as part of this alternative, or vehicles could use Brace Road. For the following reasons, the Town has opted not to evaluate this site further:

- *Site suitability/consistency with the Town of Loomis General Plan*—Placement of warehouse retail uses at the location suggested by the City of Rocklin would not be consistent with Policy 3 of the General Plan's Community Design Element that directs designing projects that fit their context in terms of building form, siting, and massing. A Costco warehouse store has a much greater building height and mass than the one- and two-story wood structures that characterize existing development in the historic downtown commercial district. According to the Town's Municipal Code, the CT zoning district is applied to areas appropriate for a mixture of office/business park, retail commercial, lodging, conference center, and other traveler-serving uses, local-serving entertainment uses, and residential uses as part of mixed-use structures. Further, Opportunity Site 3 consists of noncontiguous parcels totaling 13.6 acres when combined, which is not conducive to a warehouse retail use that ideally is 16

acres of contiguous land (i.e., large enough to accommodate the minimum square footage required for the warehouse) for site planning.

Availability and adequacy of municipal infrastructure—Similar to Opportunity Site 3, these parcels are provided regional access from the Horseshoe Bar offramp of I-80. Horseshoe Bar Road is a narrow, two-lane road and the I-80 interchange operates below accepted LOS (LOS F for the eastbound ramps during a.m. and p.m. weekday conditions). In comparison, Sierra College Boulevard is a four-lane road with dedicated turn pockets and a center median with sufficient capacity to accommodate additional traffic. Existing operating conditions at the Sierra College Boulevard ramps with I-80 are in the acceptable range: LOS B for both ramps during the a.m. peak hour and LOS B (westbound ramp) and LOS C (eastbound ramp) during the p.m. peak hour.

- *Avoidance or lessening of environmental effects of the project*—Development at this location would have impacts similar to those of the proposed project. The property is heavily wooded, vacant land that is bisected by Secret Ravine; therefore, a loss of open space, removal of trees, and impacts to jurisdictional resources may occur at this property, similar to the proposed project site. Traffic impacts would be equal to or greater than those of the proposed project because the number of vehicular trips would be identical, but the roadways accessing the two locations are very different as noted above.
- *Feasibility*—The parcel must be acquired by the project applicant, which would require negotiations with a willing seller on mutually agreeable terms. As a result, development at this location is likely less feasible than development at the proposed project site and considered speculative.
- *Ability to accomplish project objectives*—Development of this site would not meet the project objectives. With selection of this alternative, the following project objectives would be either not met or only partially met:
 - Provide a Costco warehouse in a location that is convenient for Costco members, the community, and employees to reach for shopping and work. (Operating conditions at the unimproved Horseshoe Bar Road Interchange would result in diversion of trips along local roadways as motorists seek to find ways around the congestion).
 - Provide a Costco warehouse in a location served by adequate existing infrastructure, including roadways and utilities (Horseshoe Bar Road interchange with I-80 presently operates below acceptable levels of service).
 - Locate warehouse retail uses so as not to conflict with the character, scale, and architecture of the historic central business district. (Horseshoe Bar Road is a gateway to the historic downtown. The mass and intensity of use for the warehouse related commercial is distinctly different character than the one and two story wood buildings that represent the character of old downtown).
 - Locate warehouse retail on land sufficient to provide the necessary facilities for these types of uses. (The property is smaller than the desired size for a Costco warehouse at 12.9 acres vs. the 16 acres considered to be desirable).

Conclusion: For the forgoing reasons the Town deems Opportunity Site 4 infeasible.

6.4 Alternatives Selected for Consideration

The Town of Loomis has selected four alternatives to the proposed project for comparison. An EIR need not describe or evaluate the environmental effects of alternatives at the same level of detail as the proposed project, but must include enough information to allow meaningful evaluation, analysis, and comparison with the proposed project (State CEQA Guidelines Section 15126.2[d]).

6.4.1 Alternative 1: No Project

The No Build Scenario/Existing Condition Alternative assumes that the proposed project would not be implemented and that the project site would remain in its existing condition. The purpose of describing and analyzing a no project alternative is to allow decision makers to compare the impacts of approving the proposed project with the impacts of not approving the proposed project.²

² The analysis of the no project alternative is not the baseline for determining whether the proposed project's environmental impacts may be significant, unless it is identical to the existing environmental setting analysis that does establish that baseline (see Section 15125 of the State CEQA Guidelines).

The No Project Alternative can proceed under one of two approaches. When the project is a development project on identifiable property, the “no project” alternative is the circumstance under which the project would not proceed. Here, the discussion compares the environmental effects of the property remaining in its existing state against the environmental effects that would occur if the project had been approved. If disapproval of the project under consideration would result in predictable actions by others, such as the proposal of some other project, this “no project” consequence should be discussed.³ For purposes of full disclosure, this evaluation follows both approaches, as explained below.

6.4.1.1 Alternative 1A: No Project/No Development

Under the no project/no development scenario, none of the impacts identified for the proposed project would occur. Similarly, the Town of Loomis would not receive the economic benefits associated with construction of commercial development at key locations consistent with General Plan policies. For these reasons, although Alternative 1A is considered environmentally superior to the proposed project, it fails to attain any of the project objectives outlined in Section 2.3.2.1, “Applicant Objectives,” and Section 2.3.2.2, “Town of Loomis Objectives,” in Chapter 2, “Project Description.”

6.4.1.2 Alternative 1B: No Project/Future Development

This alternative considers the circumstance under which the project site would be proposed for development of commercial uses permitted under the existing General Plan consistent with the development intensities and standards of the Loomis Municipal Code. The types of uses allowed under the General Commercial (GC) land use designation are oriented toward local residents and offices, including shops, personal and business services, and restaurants. Residential uses may also be accommodated as part of mixed-use projects. The Residential, Medium High-Density (RMH) General Plan designation is oriented toward multi-family housing, including duplexes, townhouses, and apartments. The Residential, High Density (RH) General Plan designation is oriented toward multi-family housing.

Under Alternative 1B, approximately 14 acres of the site designated as GC by the General Plan are forecast for development with a range of commercial uses, including a restaurant, business services, and retail shops on multiple, smaller development pads distributed throughout the property. The remaining approximately three acres of the site along the eastern boundary designated as RM and the remaining 0.37 acre at the northern boundary designated RH would be developed with townhomes at the maximum permitted density and allowing for extension of access south through the site. Table 6-1 provides a summary of buildout under Alternative 1B. For purposes of the analysis, it was assumed that the site plan and building architecture for Alternative 1B would meet the development standards outlined in the Loomis Municipal Code including building coverage, setbacks, landscaping, open space, and building height.

Table 6-1. Alternative 1B Development Statistics

Land Use	Amount
Shopping Center	75,000 sq. ft.
Office	25,000 sq. ft.
Low-Rise Townhomes	35 du
Restaurant	10,000 sq. ft.

Notes: du = dwelling units; sq. ft. = square feet.

Source: Data compiled by AECOM in 2017

Aesthetics

Site development under Alternative 1B would result in multiple development pads distributed around the property containing structures that would be smaller in scale and mass than under the proposed project. Like the proposed project, Alternative 1B would alter views of the site from existing conditions; however, using smaller pads would

³ In certain instances, the no project alternative means “no build,” and the existing environmental setting is maintained. However, where failure to proceed with the project would not result in preservation of existing environmental conditions, the analysis should identify the practical result of the project’s non-approval and should not create and analyze a set of artificial assumptions that would be required to preserve the existing physical environment.

provide greater flexibility to avoid natural resources on-site that form the prominent visual features, including oak trees and annual grasslands. All future development would be subject to Loomis Municipal Code standards to ensure that building form, siting, and massing would fit in with the local context.

Air Quality

Construction and operation under either the proposed project or Alternative 1B would generate emissions of criteria pollutants (Tables 6-2 and 6-3). Alternative 1B would generate similar emissions of volatile organic compounds (VOCs) as the proposed project during construction. Alternative 1B would generate lower levels of oxides of nitrogen (NO_x) emissions and higher levels of particulate matter than the proposed project during construction. All construction activities would be subject to relevant existing regulations to reduce construction-related and operational air pollutant emissions. Because the Sacramento federal non-attainment designation is NO_x limited and the proposed project would generate less NO_x, the proposed project is superior with regard to construction emissions.

Operation of Alternative 1B would result in greater levels of VOC, NO_x, and PM₁₀ when compared to the proposed project. As shown in Table 6-3, the proposed project would not generate emissions that exceed adopted thresholds and would not cause an increase in the frequency or severity of existing air quality violations, cause or contribute to new violations, or delay timely attainment of air quality standards. In contrast, operation of Alternative 1B would generate levels of VOCs and NO_x above the adopted thresholds and would exceed those of the proposed project.

Table 6-2. Comparison of Construction-Related Emissions: Proposed Project versus Alternative 1B

	Criteria Pollutant Emissions (lb/day)		
	VOCs	NO _x	PM ₁₀ ¹
Proposed Project	80	76.1	12.9
Alternative 1B	87	50	42
Significance Threshold	82	82	82
Exceed Threshold?	Yes (Alt. 1B)	No	No

Notes:

lb/day = pounds per day; NO_x = oxides of nitrogen; PM₁₀ = particulate matter with an aerodynamic diameter of 10 micrometers or less; VOC = reactive organic gases

¹ Particulate matter emissions shown include the sum of particulate matter with aerodynamic diameter of 0 to 2.5 micrometers and particulate matter with aerodynamic diameter of 2.5 to 10 micrometers.

Source: Estimated by AECOM in 2019

Table 6-3. Comparison of Operational Emissions: Proposed Project versus Alternative 1B

	Criteria Pollutant Emissions (lb/day)		
	VOCs	NO _x	PM ₁₀ ¹
Proposed Project	37	37	12
Alternative 1B	86	70	33
Significance Threshold	55	55	82
Exceed Threshold?	Yes (Alt. 1B)	Yes (Alt. 1B)	No

Notes:

Alt. = Alternative; lb/day = pounds per day; NO_x = oxides of nitrogen; PM₁₀ = particulate matter with an aerodynamic diameter of 10 micrometers or less; VOC = reactive organic gases

¹ Particulate matter emissions shown include the sum of particulate matter with aerodynamic diameter of 0 to 2.5 micrometers and particulate matter with aerodynamic diameter of 2.5 to 10 micrometers.

Source: Estimated by AECOM in 2019

Biological Resources

The proposed project would permanently disturb approximately 17.4 acres through grading activity. The project would result in a permanent disturbance to approximately 7.96 acres of oak woodland (158 trees requiring replacement), 10.16 acres of annual grassland, and 0.15 acre of palustrine emergent wetlands. As described in Section 3.4, "Biological Resources," of this DEIR, the proposed project would result in potentially significant direct and indirect impacts on oak woodlands and riparian habitat. No direct or indirect impacts on listed endangered, threatened, or candidate wildlife species would occur as a result of project construction.

Under Alternative 1B, the inclusion of smaller development pads would provide greater flexibility to avoid natural resources on the site while meeting relevant development standards for setbacks, parking, and landscaping. Impacts of Alternative 1B on oaks and emergent wetlands would be less than those of the proposed project, but impacts would not be entirely avoided. Coverage patterns for oaks, drainages, and requirements for roadway access and parking preclude the complete avoidance of impacts on individual oak trees, protected zones, oak habitat, and wetlands.

Greenhouse Gases

Development of either the proposed project or Alternative 1B would generate indirect and direct greenhouse gas (GHG) emissions associated with solid waste generation and decay; combustion of fossil fuels for transportation, heating, and lighting; and the use of energy to distribute and treat water. Table 6-4 depicts the estimated GHG emissions associated with construction and operation of Alternative 1B. As shown, Alternative 1B would generate fewer GHG equivalent emissions compared to the proposed project (5,209 MT CO₂e for this alternative compared to 6,178 CO₂e for the proposed project) but would have higher emissions per thousand feet of building space (36 versus 40 MT CO₂e/year).

Table 6-4. Modeled Greenhouse Gas Emissions for Construction and Operations of Alternative 1B

Emissions Source	GHG Emissions (MT CO ₂ e/year)
Construction GHG Emissions	
Annual Construction Emissions	903
Operational GHG Emissions	
Area	69
Energy	693
Mobile	4,225
Waste	122
Water	55
Total** Annual Operational Emissions	5,209
PCAPCD Bright-Line Threshold	10,000
Exceeds Threshold?	No
Total Annual Operational Emissions per 1,000 Square Foot	36
Rural, Nonresidential Efficiency Threshold per thousand square feet of building space	27.3
Exceeds Threshold?	Yes

Notes:

CO₂e = carbon dioxide equivalent; GHG = greenhouse gas; MT = metric tons; PCAPCD = Placer County Air Pollution Control District

* The project site is 17.4 acres (approximately 740,520 square feet).

** Totals do not add due to rounding. Includes amortized construction emissions.

Source: Modeled by AECOM in 2018. See Appendix B for modeling details, assumptions, inputs, and outputs.

Noise

Like the proposed project, Alternative 1B would expose sensitive receptors east and north of the site to construction noise. Mitigation measures would be implemented to reduce impacts, but the noise level would remain above adopted standards.

Occupancy of the project site under Alternative 1B would contribute to a permanent increase in ambient noise levels in the area from normal activities such as deliveries of goods; landscape maintenance; use of heating, ventilation, and air conditioning (HVAC) equipment; parking lot noise; and vehicular traffic on local roadways. Because Alternative 1B would increase daily vehicular trips compared to the proposed project and also requires delivery by truck to stock products, noise levels along studied roadways are expected to be louder.

With regard to on-site noise, Alternative 1B could reduce the impact of the proposed project on the Sierra Meadows Apartments. This alternative would consist of multiple, smaller development pads that could be oriented in a layout where access to and from delivery docks would route heavy trucks away from existing noise-sensitive receptors. Consequently, heavy trucks would not enter off Brace Road and pass by the apartments during the nighttime hours when the receptors are most sensitive to noise.

Transportation and Traffic

Project development would generate approximately 4,330 average daily trips (ADT) when consideration of pass-by⁴ and diverted trips⁵ is applied to the proposed project. The mix of trips associated with project operation consists of 1,111 net new trips (65 inbound, 65 outbound) to the proposed fueling station. In comparison, operation under Alternative 1B would generate 4,956 ADT (Table 6-5), or 626 more vehicular trips on a daily basis than the proposed project. Both Alternative 1B and the proposed project would be subject to Town ordinances for roadway design to ensure adequate sight distance and other applicable requirements regarding width, corner radii, and intersection stoppage. Under either scenario, the project applicant would pay development fees to fund roadway and signal improvements as outlined in Title 12.24 of the Loomis Municipal Code.

Table 6-5. Vehicular Trip Generation under Alternative 1B

ITE Code	Description	Floor Area (KSF)/ Dwellings	Daily	Total Vehicular Trips	
				A.M. Peak Hour Total	P.M. Peak Hour Total
820	Shopping Center	75	3,202	72	278
710	Office—General	25	276	39	37
231	Low-Rise Townhome	35 du	203	35	41
932	Quality Sit-Down Restaurant	10	1,275	108	99
TOTAL			4,956	254	455

Notes: Alt. = Alternative; du = dwelling units; ITE = Institute of Transportation Engineers; KSF = thousand square feet
Sources: ITE 2012; data compiled by AECOM in 2019

Energy

Like the proposed project, Alternative 1B would increase consumption of energy in the form of electricity, natural gas, and fossil fuels (e.g., gasoline, diesel fuel) during construction and operation. All new construction in the Town must comply with General Plan policies that require new development to consider energy conservation during the selection of building materials, among other design elements. The proposed project intends to incorporate the use of locally sourced, renewable, and pre-manufactured components and presumably, this same strategy could be employed under this alternative. Using locally sourced materials would reduce the project’s energy requirements for transporting materials to the project site. In addition, using renewable materials would reduce overall energy demand in extracting and manufacturing demands for such materials relative to new materials. Since the alternative is estimated to have a greater number of trips compared to the proposed project, the energy demand related to operational transportation could be higher. Neither the proposed project nor this alternative would conflict with any relevant renewable energy or energy efficiency plans. Overall, the impact is anticipated to be similar.

6.4.1.3 Ability to Accomplish Project Objectives

Development of the site as outlined under Alternative 1B would not meet the following project objectives when compared to the proposed project:

Applicant Objectives

- Construct and operate a new Costco warehouse that serves the local community with goods and services not only from nationally known businesses, but also from regional and local businesses. (Alternative 1B is a mixed-use development without warehouse retail).

⁴ Pass-by trips are existing trips on roadways adjacent to the site that would allow motorists to turn into the Costco development, then continue on to their ultimate destinations after they finish shopping.

⁵ Diverted trips are existing trips on nearby roadways in which motorists decide to drive out-of-direction for a distance to stop at Costco, then after they finish shopping, continue on their trips to their ultimate destinations.

- Provide a Costco warehouse in a location that is convenient for Costco members, the community, and employees to reach for shopping and work. (Alternative 1B is a mixed-use development without warehouse retail).
- Provide a state-of-the-art Costco warehouse to serve Costco's membership in the greater Loomis area. (Alternative 1B is a mixed-use development without warehouse retail).
- Develop a fueling station and tire facility to serve customers of the retail warehouse. (Alternative 1B is a mixed-use development without fueling station).
- Enhance the area by constructing a warehouse that has an architectural design unique to Loomis, is sensitive to the adjacent community and future developments, and is compatible with the need for a new warehouse. (Alternative 1B is a mixed-use development without warehouse retail).
- Provide a Costco warehouse in a location served by adequate existing infrastructure, including roadways and utilities. (Alternative 1B is a mixed-use development without warehouse retail).
- Develop a Costco warehouse large enough to accommodate all uses and services that Costco provides to its members elsewhere. (Alternative 1B is a mixed-use development without warehouse retail).

Town of Loomis Objectives

- Locate warehouse retail uses and a fueling station near existing interchanges to minimize impacts on Loomis. (General Plan Goal 6) (Alternative 1B is a mixed-use development without warehouse retail).
- Locate warehouse retail uses and a fueling station so as not to conflict with the character, scale, and architecture of the historic central business district. (Alternative 1B is a mixed-use development without warehouse retail).
- Locate warehouse retail on land sufficient to provide the necessary facilities for these types of uses. (Alternative 1B is a mixed-use development without warehouse retail).
- Expand the space available for integrated retail sales of goods and services, and fuel in Loomis. (Alternative 1B is a mixed-use development without warehouse retail).

6.4.2 Alternative 2: No Fueling Station

The No Fueling Station Alternative would remove the proposed 30-dispenser fueling station from the proposed project. The remainder of the site layout would remain unchanged. This alternative would reduce the expected vehicular trips to and from the project site, thereby reducing impacts related to air quality, GHG emissions, and traffic. Under this alternative, all new square footage would be dedicated to general merchandise and food sales.

6.4.2.1 Aesthetics

Removing the fueling station would eliminate views of the 7,560-square-foot canopy and a 106-square-foot controller enclosure as observed from Key Viewpoint 1 (Sierra College Boulevard). As with the proposed project, development of the site under Alternative 2 would be subject to the requirements of the Loomis Municipal Code with regard to landscaping, building setbacks, massing, and height. No disruption to scenic corridors or highways would occur under Alternative 2 because none are located in the study area. Site development under Alternative 2 would remove oak woodland canopy, as would the proposed project, but to a lesser degree than site development under the project. Under either the proposed project or Alternative 2, a landscape plan would be prepared that would incorporate replacement oak trees into the landscape palette to retain the tree canopy, which represents a visual amenity contributing to the visual character of the community.

6.4.2.2 Air Quality

Construction and operation under either the proposed project or Alternative 2 would generate emissions of criteria pollutants from mobile and stationary sources. Alternative 2 would generate fewer construction-related and operational emissions than the proposed project, given that smaller size building requires less application of architectural coatings during construction and the number of vehicular trips would be reduced on a daily basis during operations (Table 6-6).

This alternative would also avoid the potential for release of toxic air contaminants that may affect nearby uses and are typically associated with operation of a fueling station, including benzene, toluene, and hydrocarbons. These compounds can be released during refilling of the station storage tanks, during fueling of automobiles, and from spillage.

Table 6-6. Comparison of Operational Emissions: Proposed Project versus Alternative 2

	Criteria Pollutant Emissions (lb/day)		
	VOCs	NO _x	PM ₁₀ ¹
Proposed Project	37	37	12
Alternative 2	8	29	9
Significance Threshold	55	55	82
Exceed Threshold?	No	No	No

Notes:

lb/day = pounds per day; NO_x = oxides of nitrogen; PM₁₀ = particulate matter with an aerodynamic diameter of 10 micrometers or less; VOC = reactive organic gases

¹ Particulate matter emissions shown include the sum of particulate matter with aerodynamic diameter of 0 to 2.5 micrometers and particulate matter with aerodynamic diameter of 2.5 to 10 micrometers.

Source: Estimated by AECOM in 2019

6.4.2.3 Biological Resources

The proposed project would permanently disturb approximately 17.4 acres through grading activity. In the area of permanent disturbance, approximately 7.96 acres of oak woodland (158 trees requiring replacement), 10.16 acres of annual grassland, and 0.15 acre of palustrine emergent wetlands would be affected by site development. As described in Section 3.4, “Biological Resources,” of this EIR, the proposed project (Project Driveway Access Options 1A, 1B, and 1C) would result in potentially significant direct and indirect impacts on oak woodlands and riparian habitat. No direct or indirect impacts on listed endangered, threatened, or candidate wildlife species would occur as a result of project construction.

Under Alternative 2, grading activity would result in permanent disturbance of 15.3 acres (2.1 acres less than the proposed project). Impacts of Alternative 2 on emergent wetlands would be the same as impacts of the proposed project, while Alternative 2 would result in less disturbance to oaks because the fueling station would not be constructed. Coverage patterns, drainage, and roadway access preclude the complete avoidance of any loss of individual oak trees, protected zones, oak habitat, and wetlands through placement and sizing of the warehouse structure.

6.4.2.4 Greenhouse Gases

Development of either the proposed project or Alternative 2 would generate indirect and direct GHG emissions associated with solid waste generation and decay; combustion of fossil fuels for transportation, heating, and lighting; and the use of energy to distribute and treat water. Alternative 2 would reduce GHG emissions (Table 6-7), compared to the proposed project (6,178 MT CO₂e/year for the proposed project compared to 5,184 MT CO₂e/year for Alternative 2) and would result in less emissions per 1,000 square foot on annualized basis than does the project (40 MT CO₂e/thousand square feet/year for the proposed project compared to 33 MT CO₂e/thousand square feet/year for Alternative 2). However, the level of GHG emissions would still be above the per-square-foot threshold recommended by the Placer County Air Pollution Control District (PCAPCD) (i.e., similar to the proposed project).

6.4.2.5 Noise

As with the proposed project, construction activity under Alternative 2 would expose sensitive receptors east and north of the site to equipment noise that would exceed standards. Mitigation measures would be implemented to reduce impacts, but similar to the proposed project, construction activity would generate noise levels that would exceed the standards even after implementation of all feasible mitigation.

Occupancy of the project site under Alternative 2 would contribute to a permanent increase in ambient noise levels in the area from normal activities, such as operation of delivery vehicles, landscape maintenance, HVAC equipment, and vehicular traffic on local roadways. The reduction in trips associated with the removal of the fueling station would also reduce transportation noise along area roadways somewhat. Alternative 2 would reduce on site noise generated by delivery trucks because this alternative eliminates heavy truck trips delivering fuel.

Table 6-7. Modeled Greenhouse Gas Emissions for Construction and Operations of Alternative 2

Emissions Source	GHG Emissions (MT CO ₂ e/year)
Construction GHG Emissions	
Amortized Construction Emissions	13
Operational GHG Emissions	
Area	0.02
Energy	678
Mobile	4,124
Waste	329
Water	40
Total** Annual Operational Emissions	5,184
PCAPCD Bright-Line Threshold	10,000
Exceeds Threshold?	No
Total Annual Operational Emissions per 1,000 Square Foot	33
Rural, Nonresidential Efficiency Threshold per thousand square feet of building space	27.3
Exceeds Threshold?	YES

Notes:

CO₂e = carbon dioxide equivalent; GHG = greenhouse gas; MT = metric tons; PCAPCD = Placer County Air Pollution Control District

* The project site is 17 acres (approximately 740,520 square feet) consisting of the proposed warehouse.

** Totals do not add due to rounding.

Source: Modeled by AECOM in 2019. See Appendix B for modeling details, assumptions, inputs, and outputs.

6.4.2.6 Transportation and Traffic

The Costco fueling station is assumed to generate roughly 5,000 trips a day, but approximately 34 percent of these trips also visit the warehouse, therefore approximately 3,300 fewer trips daily would be generated under Alternative 2. Employee trips would be approximately the same as under the proposed project. The same number of warehouse deliveries per day is expected. However, no fuel deliveries would be provided with Alternative 2, resulting in a reduction of seven fuel trucks inbound and outbound.

Both Alternative 2 and the proposed project would be subject to Town ordinances for roadway design to ensure adequate sight distance and other applicable requirements regarding width, corner radii, and intersection stoppage. Under either alternative, the project applicant would pay development fees to fund roadway and signal improvements, as outlined in Title 12.24 of the Loomis Municipal Code.

6.4.2.7 Energy

Like the proposed project, Alternative 2 would increase consumption of energy in the form of electricity, natural gas, and fossil fuels (e.g., gasoline, diesel fuel) during construction and operation. All new construction in the Town must comply with General Plan policies that require new development to consider energy conservation during the selection of building materials, among other design elements. The proposed project intends to incorporate the use of locally sourced, renewable, and pre-manufactured components and presumably, this same strategy could be employed under this alternative. Using locally sourced materials would reduce the project's energy requirements for transporting materials to the project site. In addition, using renewable materials would reduce overall energy demand in extracting and manufacturing demands for such materials relative to new materials. Since Alternative 2 would reduce the number of trips and VMT during the operational phase, it would require less energy. Neither the proposed project nor this alternative would conflict with any relevant renewable energy or energy efficiency plans. Overall, the impact is anticipated to be similar.

6.4.2.8 Ability to Accomplish Project Objectives

Development of the site as outlined under Alternative 2 would not meet the following project objectives:

Applicant Objectives

- Develop a fueling station and tire facility to serve customers of the retail warehouse.
- Develop a Costco warehouse large enough to accommodate all uses and services that Costco provides to its members elsewhere.

Town of Loomis Objectives

- Locate warehouse retail uses and a fueling station near existing interchanges to minimize impacts on Loomis. (General Plan Goal 6)
- Locate warehouse retail uses and a fueling station so as not to conflict with the character, scale, and architecture of the historic central business district.
- Expand the space available for integrated retail sales of goods and services, and fuel in Loomis.

6.4.3 Alternative 3: Reduced Floor Space

Alternative 3 would decrease floor space of the proposed warehouse structure by approximately 20 percent compared to the proposed project. The fueling station would be included under Alternative 3, and the layout of buildings, roadways and parking lot would remain the same as the proposed project. Floor space at the warehouse retail structure, fueling station, and parking lot would occupy 124,315 square feet compared to the proposed project at up to approximately 155,000 square feet. All activities planned for the proposed project would occur under Alternative 3 including sales of goods and services, optical exams and sales, photo center processing, hearing aid testing and sales, food service preparation and sales (including meat and baked goods), alcohol sales and tasting, tire center, and fuel sales.

6.4.3.1 Aesthetics

Alternative 3 would slightly reduce building mass when compared to the proposed project although the building would remain visible from surrounding vantage points. Alternative 3 would result in a smaller building footprint. As with the proposed project, development of the site under Alternative 3 would be subject to the requirements of the Loomis Municipal Code with regard to landscaping, building setbacks, massing, and height. No disruption to scenic corridors or highways would occur under either the proposed project or Alternative 3 because none are located in the study area. Under either the proposed project or Alternative 3, the final landscape plan would incorporate replacement oak trees into the landscape palette to retain the tree canopy, which represents a visual amenity contributing to the character of the community. Views of the warehouse retail building from off-site vantage points would be similar to those under the proposed project and would be consistent with the visual character of existing commercial centers found at the intersection of Sierra College Boulevard.

6.4.3.2 Air Quality

Construction and operation under either the proposed project or Alternative 3 would generate emissions of criteria pollutants from mobile and stationary sources. Alternative 3 would reduce construction-related emissions compared to the proposed project due to the smaller building size of the warehouse, which would require less time and equipment to build and would have less exterior surface that requires architectural coating.

Operational emissions would be lower compared to the proposed project (Table 6-8). Both the proposed project and Alternative 3 would be found consistent with regional air attainment plans for criteria pollutants. Neither the proposed project nor Alternative 3 would cause an increase in the frequency or severity of existing air quality violations, cause or contribute to new violations, or delay timely attainment of air quality standards.

Table 6-8. Comparison of Operational Emissions: Proposed Project versus Alternative 3

	Criteria Pollutant Emissions (lb/day)		
	VOCs	NO _x	PM ₁₀ ¹
Proposed Project	37	37	12
Alternative 3	36	32	10
Significance Threshold	55	55	82
Exceed Threshold?	No	No	No

Notes:

lb/day = pounds per day; NO_x = oxides of nitrogen; PM₁₀ = particulate matter with an aerodynamic diameter of 10 micrometers or less; VOC = reactive organic gases

¹ Particulate matter emissions shown include the sum of particulate matter with aerodynamic diameter of 0 to 2.5 micrometers and particulate matter with aerodynamic diameter of 2.5 to 10 micrometers.

Source: Estimated by AECOM in 2019

6.4.3.3 Biological Resources

The proposed project would permanently disturb approximately 17.4 acres through grading activity resulting in permanent disturbance to approximately 7.96 acres of oak woodland (158 protected trees requiring replacement), 10.16 acres of annual grassland, and 0.15 acre of palustrine emergent wetlands would be affected by site development.

As described in Section 3.4, "Biological Resources," of this EIR, the proposed project would result in potentially significant direct and indirect impacts on oak woodlands and riparian habitat. No direct or indirect impacts on listed endangered, threatened, or candidate wildlife species would occur as a result of project construction.

Under Alternative 3, grading activity would result in permanent disturbance of 16.4 acres, approximately 0.7 acre less than the proposed project. Impacts of Alternative 3 on emergent wetlands would be similar to those of the proposed project as this resource is centrally located on the property. Alternative 3 may result in loss of fewer oaks than under the proposed project, since the footprint of the warehouse building would be smaller. However, coverage patterns, drainage, and roadway access preclude the complete avoidance of any loss of individual oak trees, protected zones, oak habitat, and wetlands through placement and sizing of the warehouse structure. These resources would be affected under any site plan because of their distribution across the project site.

6.4.3.4 Greenhouse Gases

Development of either the proposed project or Alternative 3 would generate indirect and direct GHG emissions associated with solid waste generation and decay; combustion of fossil fuels for transportation, heating, and lighting; and the use of energy to distribute and treat water. Alternative 3 would reduce GHG emissions (Table 6-9), compared to the proposed project (6,178 MT CO₂e/year for the proposed project compared to 5,575 MT CO₂e/year for Alternative 3) but would result in higher emissions per 1,000 square foot on annualized basis than does the project (40 MT CO₂e/thousand square feet/year for the proposed project compared to 45 MT CO₂e/thousand square feet/year for Alternative 3). GHG emissions per thousand square feet would be above the threshold recommended by the PCAPCD for both the proposed project and Alternative 3. Therefore, the overall impact is considered similar.

Table 6-9. Modeled Greenhouse Gas Emissions for Construction and Operations of Alternative 3

Emissions Source	GHG Emissions (MT CO ₂ e/year)
Construction GHG Emissions	
Amortized Construction Emissions	13
Operational GHG Emissions	
Area	0.02
Energy	543
Mobile	4,632
Waste	343
Water	42
Total** Annual Operational Emissions	5,575
PCAPCD Bright-Line Threshold	10,000
Exceeds Threshold?	No
Total Annual Operational Emissions per 1,000 Square Foot	45
Rural, Non-residential Efficiency Threshold/ksf	27.3
Exceeds Threshold?	YES

Notes:

CO₂e = carbon dioxide equivalent; GHG = greenhouse gas; MT = metric tons; PCAPCD = Placer County Air Pollution Control District

* The project site is 17 acres (approximately 740,520 square feet); the proposed warehouse and fueling center would occupy approximately 124,315 square feet of the site.

** Totals do not add due to rounding.

Source: Modeled by AECOM in 2019. See Appendix B for modeling details, assumptions, inputs, and outputs.

6.4.3.5 Noise

Construction activity under Alternative 3 would be similar to the proposed project because the warehouse building would be developed in the same location on the project site. The reduced floor space would not substantially lessen the duration of construction activities. Mitigation measures would be implemented to reduce impacts, but similar to the proposed project, construction activity would generate noise levels that would exceed the standards even after implementation of all feasible mitigation.

Occupancy of the project site under Alternative 3 would contribute to a permanent increase in ambient noise levels in the area from normal activities such as operation of delivery vehicles, landscape maintenance, HVAC equipment, and vehicular traffic on local roadways. Alternative 3 would reduce both member trips to the site and deliveries, and therefore transportation noise levels in the vicinity of the project site would be reduced compared to the proposed project.

6.4.3.6 Transportation and Traffic

Alternative 3 would reduce member trips to the project site by approximately 20 percent compared to the proposed project. Employee trips would be approximately the same as under the proposed project. Under this alternative, the same number of warehouse deliveries a day (13 trucks) and the same number of fuel deliveries (7 trucks) would occur under this alternative as with the proposed project. Overall travel demand would be reduced.

Both Alternative 3 and the proposed project would be subject to Town ordinances for roadway design to ensure adequate sight distance and other applicable requirements regarding width, corner radii, and intersection stoppage. Under either alternative, the project applicant would pay development fees to fund roadway and signal improvements as outlined in Title 12.24 of the Loomis Municipal Code.

6.4.3.7 Energy

Like the proposed project, Alternative 3 would increase consumption of energy in the form of electricity, natural gas, and fossil fuels (e.g., gasoline, diesel fuel) during construction and operation. All new construction in the Town must comply with General Plan policies that require new development to consider energy conservation during the selection of building materials, among other design elements. The proposed project intends to incorporate the use of locally sourced, renewable, and pre-manufactured components and presumably, this same strategy could be employed under this alternative. Using locally sourced materials would reduce the project's energy requirements for transporting materials to the project site. In addition, using renewable materials would reduce overall energy demand in extracting and manufacturing demands for such materials relative to new materials. Since Alternative 3 would reduce the number of trips and VMT during the operational phase, it would require less energy. Neither the proposed project nor this alternative would conflict with any relevant renewable energy or energy efficiency plans. Overall, the impact is anticipated to be similar.

6.4.3.8 Ability to Accomplish Project Objectives

Development of the site as outlined under Alternative 3 would not meet several of the project objectives to the extent that they would be met by the proposed project. The following project objective would not be met with selection of this alternative:

Applicant Objectives

- Develop a Costco warehouse large enough to accommodate all uses and services that Costco provides to its members elsewhere.

6.4.4 Alternative 4: Reduced Floor Space and No Fueling Station

Alternative 4 would decrease floor space of the proposed warehouse structure by 20 percent compared to the proposed project. Alternative 4 would remove the fueling station included in the proposed project. The remainder of the site layout would remain unchanged from that of the proposed project.

Floor space at the warehouse retail structure would occupy 124,315 square feet compared to the proposed project at 155,000 square feet. Alternative 4 would include sales of goods and services, optical exams and sales, photo center processing, hearing aid testing and sales, food service preparation and sales (including meat and baked goods), alcohol sales and tasting, and tire center. No fuel sales would occur.

6.4.4.1 Aesthetics

Alternative 4 would slightly reduce building mass when compared to the proposed project, although the building would remain visible from surrounding vantage points. Alternative 4 would reduce the visibility of buildings on the site because the warehouse structure would be reduced in size and the fueling station would be removed. No disruption to scenic corridors or highways would occur under either the proposed project or Alternative 4 because none are located in the study area. Removing the fueling station would eliminate views of the 7,560-square-foot canopy and a 106-square-foot controller enclosure as observed from Key Viewpoint 1 (Sierra College Boulevard). Site development under Alternative 4 would remove slightly less oak woodland canopy when compared to the proposed project.

As with the proposed project, development of the site under Alternative 4 would be subject to the requirements of the Loomis Municipal Code with regard to landscaping, building setbacks, massing, and height. Under either the proposed project or Alternative 4, the final landscape plan would incorporate replacement oak trees into the landscape palette to retain the tree canopy, which represents a visual amenity contributing to the character of the community. Views of the warehouse retail building from off-site vantage points would be similar to those under the proposed project and would be consistent with the visual character of existing commercial centers found at the intersection of Sierra College Boulevard.

6.4.4.2 Air Quality

Construction and operation under either the proposed project or Alternative 4 would generate emissions of criteria pollutants from mobile and stationary sources. Alternative 4 would reduce construction-related emissions compared to the proposed project due to the reduction in floor space of the warehouse, which would require less architectural coating than the proposed project and removal of the fueling station.

With the reduction in trips and VMT to the project site, and with the reduction in square footage of the alternative, operational emissions would be lower under this alternative when compared to the proposed project (Table 6-10). Neither the proposed project nor Alternative 4 would generate emissions of criteria pollutants that exceed relevant thresholds recommended by PCAPCD, however. Neither the proposed project nor Alternative 4 would cause an increase in the frequency or severity of existing air quality violations, cause or contribute to new violations, or delay timely attainment of air quality standards.

This alternative would also avoid the potential for release of toxic air contaminants that may affect nearby uses and are typically associated with operation of a fueling station, including benzene, toluene, and hydrocarbons. These compounds can be released during refilling of the station storage tanks, during fueling of automobiles, and from spillage. Application of mitigation would reduce this impact under any development scenario.

Table 6-10. Comparison of Operational Emissions: Proposed Project versus Alternative 4

	Criteria Pollutant Emissions (lb/day)		
	VOCs	NO _x	PM ₁₀ ¹
Proposed Project	37	37	12
Alternative 4	7	19	7
Significance Threshold	55	55	82
Exceed Threshold?	No	No	No

Notes:

lb/day = pounds per day; NO_x = oxides of nitrogen; PM₁₀ = particulate matter with an aerodynamic diameter of 10 micrometers or less; VOC = reactive organic gases

¹ Particulate matter emissions shown include the sum of particulate matter with aerodynamic diameter of 0 to 2.5 micrometers and particulate matter with aerodynamic diameter of 2.5 to 10 micrometers.

Source: Estimated by AECOM in 2019

6.4.4.3 Biological Resources

As described in Section 3.4, “Biological Resources,” of this EIR, the proposed project would result in potentially significant direct and indirect impacts on oak woodlands and riparian habitat. No direct or indirect impacts on listed endangered, threatened, or candidate wildlife species would occur as a result of project construction.

Under Alternative 4, grading activity would be comparable to the project resulting in permanent disturbance of 17.4 acres (7.96 acres of oak woodland, 158 trees requiring replacement in the Town, 10.16 acres of annual grassland, and 0.15 acre of palustrine emergent wetlands). Under all development scenarios, vegetation on the site must be grubbed, soils over excavated and recompacted, and graded for development pads. Impacts of Alternative 4 on emergent wetlands would be similar to those of the proposed project as this resource is centrally located on the property. However, coverage patterns, drainage, and roadway access preclude the complete avoidance of any loss of individual oak trees, protected zones, oak habitat, and wetlands through placement and sizing of the warehouse structure. These resources would be affected under any site plan because of their distribution across the project site.

6.4.4.4 Greenhouse Gases

Development of either the proposed project or Alternative 4 would generate indirect and direct GHG emissions associated with solid waste generation and decay; combustion of fossil fuels for transportation, heating, and lighting; and the use of energy to distribute and treat water.

Development of either the proposed project or Alternative 4 would generate indirect and direct GHG emissions associated with solid waste generation and decay; combustion of fossil fuels for transportation, heating, and lighting; and the use of energy to distribute and treat water. Alternative 4 would reduce GHG emissions (Table 6-11), compared to the proposed project (6,178 MT CO₂e/year for the proposed project compared to 4,603 MT CO₂e/year for Alternative 3) and would result in lower emissions per 1,000 square foot on annualized basis than does the project (40 MT CO₂e/thousand square feet/year for the proposed project compared to 37 MT CO₂e/thousand square feet/year for Alternative 4). GHG emissions per thousand square feet would be above the threshold recommended by the PCAPCD for both the proposed project and Alternative 4.

Table 6-11. Modeled Greenhouse Gas Emissions for Construction and Operations of Alternative 4

Emissions Source	GHG Emissions (MT CO ₂ e/year)
Construction GHG Emissions	
Amortized Construction Emissions	13
Operational GHG Emissions	
Area	0.02
Energy	543
Mobile	3,661
Waste	343
Water	42
Total** Annual Operational Emissions	4,603
PCAPCD Bright-Line Threshold	10,000
Exceeds Threshold?	No
Total Annual Operational Emissions per 1,000 Square Foot	37
Rural, Non-residential Efficiency Threshold/ksf	27.3
Exceeds Threshold?	YES

Notes:

CO₂e = carbon dioxide equivalent; GHG = greenhouse gas; MT = metric tons; PCAPCD = Placer County Air Pollution Control District

* Source: Modeled by AECOM in 2019. See Appendix B for modeling details, assumptions, inputs, and outputs.

6.4.4.5 Noise

Construction activity under Alternative 4 would be similar to the proposed project because the warehouse building would be developed in the same location on the project site. The reduced floor space would not substantially lessen the duration of construction activities. Mitigation measures would be implemented to reduce impacts, but similar to the proposed project, construction activity would generate noise levels that would exceed the standards even after implementation of all feasible mitigation.

Under any scenario, occupancy of the project site with a commercial warehouse use would contribute to a permanent increase in ambient noise levels in the area from normal activity such as operation of delivery vehicles, traffic on local roads and in parking lot, and from mechanical equipment associated with HVAC and the tire shop. Alternative 4 would reduce both member trips to the site and deliveries, and therefore transportation noise levels in the vicinity of the project site would be reduced compared to the proposed project.

6.4.4.6 Transportation and Traffic

Total daily trips by members under Alternative 4 would be approximately 47 percent lower compared to the proposed project due to the reduction in the size of the warehouse and the lack of a fueling station. Employee trips would be approximately the same. The number of deliveries for the warehouse would be the same as for the proposed project, but there would be no need for fuel deliveries.

Both the Alternative 4 and the proposed project would be subject to Town ordinances for roadway design to ensure adequate sight distance and other applicable requirements regarding width, corner radii, and intersection stoppage. Under either alternative, the project applicant would pay development fees to fund roadway and signal improvements as outlined in Title 12.24 of the Loomis Municipal Code.

6.4.4.7 Energy

Like the proposed project, Alternative 4 would increase consumption of energy in the form of electricity, natural gas, and fossil fuels (e.g., gasoline, diesel fuel) during construction and operation. All new construction in the Town must comply with General Plan policies that require new development to consider energy conservation during the selection of building materials, among other design elements. The proposed project intends to incorporate the use of locally sourced, renewable, and pre-manufactured components and presumably, this same strategy could be employed

under this alternative. Using locally sourced materials would reduce the project's energy requirements for transporting materials to the project site. In addition, using renewable materials would reduce overall energy demand in extracting and manufacturing demands for such materials relative to new materials. Since Alternative 4 would reduce the number of trips and VMT during the operational phase, it would require less energy. Neither the proposed project nor this alternative would conflict with any relevant renewable energy or energy efficiency plans. Overall, the impact is anticipated to be similar.

6.4.4.8 Ability to Accomplish Project Objectives

Development of the site as outlined under Alternative 4 would not meet several of the project objectives to the extent that they would be met by the proposed project. Development of the site as outlined under Alternative 4 would not meet the following project objectives:

Applicant Objectives

- Develop a fueling station and tire facility to serve customers of the retail warehouse.
- Develop a Costco warehouse large enough to accommodate all uses and services that Costco provides to its members elsewhere.

Town of Loomis Objectives

- Locate warehouse retail uses and a fueling station near existing interchanges to minimize impacts on Loomis. (General Plan Goal 6)
- Locate warehouse retail uses and a fueling station so as not to conflict with the character, scale, and architecture of the historic central business district.
- Expand the space available for integrated retail sales of goods and services, and fuel in Loomis

6.5 Environmentally Superior Alternative

CEQA requires an EIR to identify the environmentally superior project alternative (California Code of Regulations Title 14, Section 15126.6[e]). If the "no project" alternative is the environmentally superior alternative, then the EIR must also identify an environmentally superior alternative from among the others (California Code of Regulations Title 14, Section 15126.6[e][2]). In this case, the no project alternative is superior, so the EIR must select among the others for the environmentally superior alternative. Based on the information provided below, Alternative 4: Reduced Floor Space and No Fueling Station is the environmentally superior alternative (Table 6-12).

Alternative 4 (Reduced Floor Space and No Fueling Station) would result in six impact areas that are less than or equal to those for the proposed project. Alternative 4 would disturb less land, remove fewer oaks, would generate fewer vehicle trips, and would generate less criteria air pollutants than the proposed project. Operation of Alternative 4 would also generate fewer greenhouse gas emissions (CO₂e) than the project. Additionally, Alternative 4 would reduce the unavoidable significant traffic impact along Sierra College Boulevard compared to the proposed project and would reduce the nighttime interior noise impact experienced at Sierra Meadows apartment units that face the delivery entrance. Alternative 4 would fail to meet five of the basic project objectives (Table 6-13).

Alternative 1B: This alternative assumed a range of commercial uses, including a restaurant, offices, and retail shops on multiple, smaller development pads distributed throughout the property. This alternative would result in impacts in two topical categories that are greater than the proposed project, including transportation and traffic, which is identified as significant and unavoidable with operation of the proposed project.

While Alternative 1B would not avoid or lessen the significant unavoidable traffic impacts, this alternative would avoid the significant unavoidable noise impact to the Sierra Meadows Apartments building created by heavy truck deliveries entering the site off Brace Road. Instead, Alternative 1B would allow for a layout that could avoid routing trucks off Brace Road past the apartment building. Alternative 1B would also fail to meet or fully achieve 11 basic project objectives (Table 6-13).

Table 6-12. Comparison of Alternatives

Issue	Alternative 1A: No Project/ No Development	Alternative 1B: No Project/ Future Development	Alternative 2: No Fueling Station	Alternative 3: Reduced Floor Space	Alternative 4: Reduced Floor Space and No Fueling Station
Aesthetics	Less	Less	Similar	Similar	Similar
Air Quality	Less	Greater	Less	Less	Less
Biology	Less	Less	Less	Less	Less
Greenhouse Gases	Less	Less	Less	Similar	Less
Noise	Less	Less	Similar	Less	Less
Transportation and Traffic	Less	Greater	Less	Less	Less
Energy	Less	Similar	Similar	Similar	Less
Total Number of Reduced Impacts	7	4	4	4	6

Notes: CWA = Clean Water Act; GHG = greenhouse gas; USFWS = U.S. Fish and Wildlife Service
 Source: Data compiled by AECOM in 2017

Alternative 2 (No Fueling Station) would result in four impact areas that are less than or equal to those for the proposed project. Alternative 2 would generate fewer vehicle trips, less criteria air and fewer greenhouse gas emissions (CO₂e) than the project. Alternative 2 would result in fewer vehicle trips than the project so the unavoidable significant traffic impact along Sierra College Boulevard would be slightly reduced compared to the proposed project. The site plan would remain similar to the project so Alternative 2 would not avoid or lessen the significant unavoidable noise impact experienced at Sierra Meadows Apartments units that face the delivery entrance. Alternative 2 would fail to meet or fully achieve five of the basic project objectives (Table 6-13).

Alternative 3 (Reduced Floor Space) would result in four impact areas that are less than the proposed project. Alternative 3 would disturb less land (16.4 acres compared to 17.4 acres for the proposed project) and may remove fewer oaks than the proposed project. However, Alternative 3 would not avoid or reduce the unavoidable significant traffic impacts. Alternative 3 would fail to meet or fully achieve one of the basic project objectives (Table 6-13).

Table 6-13. Project Objectives Not Met by Each Alternative

Issue	Alternative 1B: No Project/ Future Development	Alternative 2: No Fueling Station	Alternative 3: Reduced Floor Space	Alternative 4: Reduced Floor Space and No Fueling Station
Applicant Objectives				
Construct and operate a new Costco warehouse that serves the local community with goods and services not only from nationally known businesses, but also from regional and local businesses.	X			
Reduce energy consumption by incorporating passive lighting into building design; using computer-controlled monitoring equipment and high-efficiency heating, ventilation, and air conditioning (HVAC) equipment; and promoting energy efficiencies that exceed state and federal code requirements.				
Provide a Costco warehouse in a location that is convenient for Costco members, the community, and employees to reach for shopping and work.	X			
Increase employment opportunities and contribute to the Town of Loomis's (Town's) job/housing balance.				
Provide a state-of-the-art Costco warehouse to serve Costco's membership in the greater Loomis area.	X			
Develop a fueling station and tire facility to serve customers of the retail warehouse	X	X		X

Table 6-13. Project Objectives Not Met by Each Alternative

Issue	Alternative 1B: No Project/ Future Development	Alternative 2: No Fueling Station	Alternative 3: Reduced Floor Space	Alternative 4: Reduced Floor Space and No Fueling Station
Enhance the area by constructing a warehouse that has an architectural design unique to Loomis, is sensitive to the adjacent community and future developments, and is compatible with the need for a new warehouse.	X			
Minimize circulation conflicts between automobiles and pedestrians.				
Plan and design for public transit access.				
Provide a Costco warehouse in a location served by adequate existing infrastructure, including roadways and utilities.	X			
Develop a Costco warehouse large enough to accommodate all uses and services that Costco provides to its members elsewhere.	X	X	X	X
Town Objectives				
Locate warehouse retail uses and a fueling station near existing interchanges to minimize impacts on Loomis. (General Plan Goal 6)	X	X		X
Locate warehouse retail uses and a fueling station so as not to conflict with the character, scale, and architecture of the historic central business district.	X	X		X
Locate warehouse retail on land sufficient to provide the necessary facilities for these types of uses.	X			
Improve Loomis's commercial base to increase municipal revenues through increased retail sales taxes as well as employee spending and provide a wider range of goods and services for local residents, in addition to encouraging commercial uses near the freeway.				
Expand the space available for integrated retail sales of goods and services, and fuel in Loomis	X	X		X
Total Project Objectives Not Met	11	5	1	5