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]).CEQA generally defines "feasible" to mean "capable of being accomplished in a successful manner within a reasonable period of time, taking into account environmental, social, technological, and legal factors." The following factors may also be taken into consideration when assessing the feasibility of alternatives: site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries, and the ability of a project proponent to attain site control (State CEQA Guidelines, Section 15126.6[f][1]).

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.

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]).

6.2 Factors Considered in Selection of Alternatives

Consistent with Section 15126.6(c) of the State CEQA Guidelines, the Town of 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 as described in Chapter 2, "Project Description,"
- consistency with the *Town of Loomis General Plan* (General Plan) and other policy or regulatory considerations,
- availability and adequacy of municipal infrastructure,
- the extent to which the alternative would avoid or lessen significant environmental impacts,
- the feasibility of construction and operation of the alternative, and
- the site's suitability for the proposed use.

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]).

6.3 Alternatives Removed from Consideration

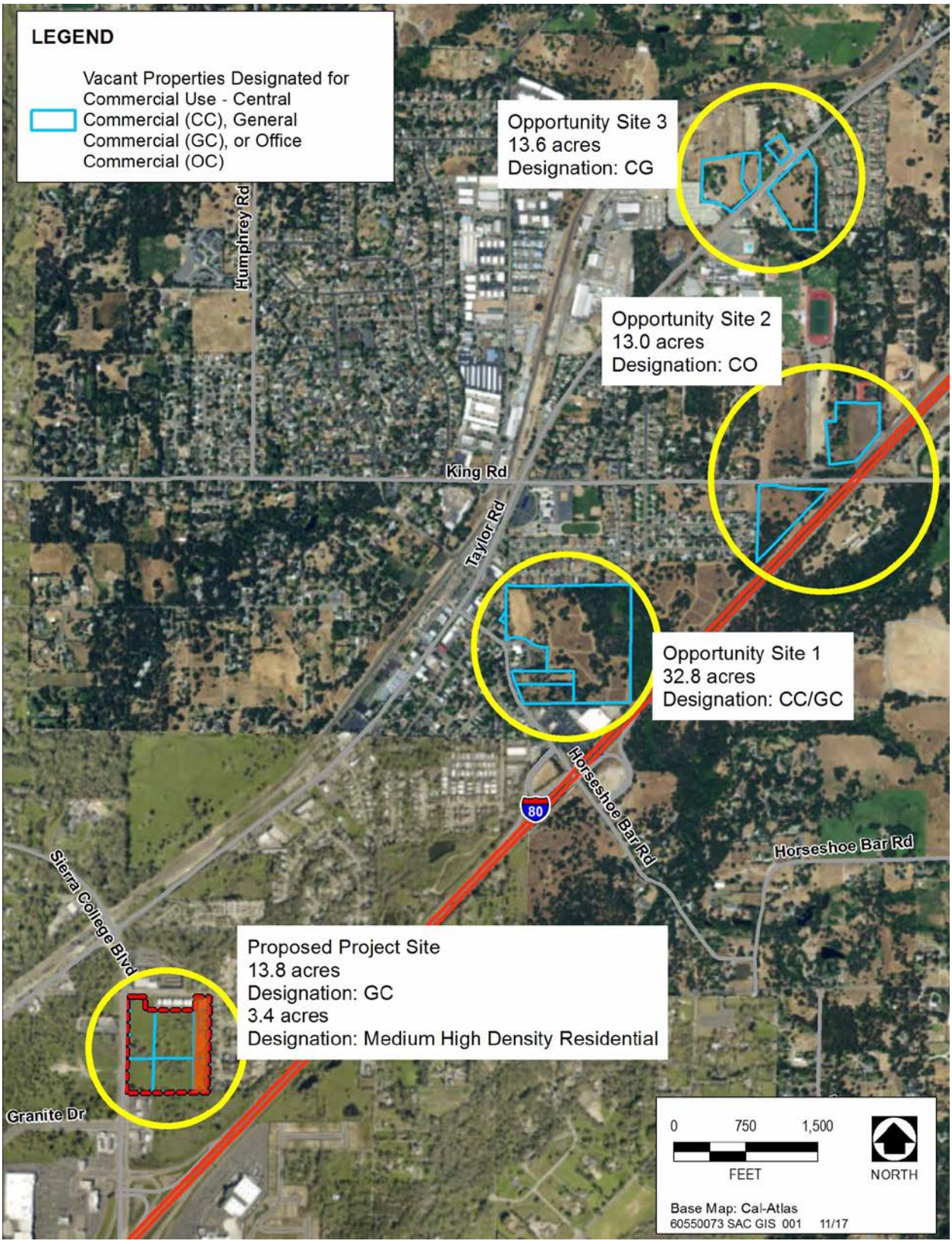
CEQA Section 15126.6(f)(2) requires that the lead agency consider alternative locations if using an off-site location would avoid or lessen any of the significant effects of the project. Only locations that would avoid or substantially lessen any of the project's significant effects need be considered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

Three 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 designated for commercial use by the General Plan, and are served by roadways with convenient freeway access (Figure 6-1). For each opportunity site, the following discussion analyzes the site's suitability/consistency with the General Plan, availability and adequacy of municipal infrastructure, avoidance or lessening of environmental effects of the project, feasibility, and ability to accomplish project objectives. For the reasons outlined below, construction and operation of the proposed project at these opportunity sites would not be feasible, and no other site would go as far as the proposed project site toward meeting the project's objectives.

6.3.1 Off-Site Location at Opportunity Site 1

Opportunity Site 1 is 32.8 acres and consists of nine vacant parcels designated by the General Plan for Central Commercial (CC) and General Commercial (CG) land uses. The CC designation applies to approximately 2 acres of the site fronting Horseshoe Bar Road. CC-designated lands are areas of the historical downtown that are appropriate for a mixture of land uses, with primarily retail and pedestrian-oriented office uses on the ground floors of commercial structures and residential units allowed on the second and third floors. The CG designation applies to the approximately 30 acres of the opportunity site that are set back from the road. The CG designation is for retail and service commercial uses that serve primarily residents and businesses. 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 goals 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 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 I-80 interchange until the identified improvements are in place and operating.
- *Avoidance or lessening of environmental effects of the project*—Development at Opportunity Site 1 would likely have impacts similar to those of the proposed project. The Opportunity Site 1 property is heavily wooded, vacant land; therefore, a loss of open space and removal of trees would occur at this property, similar to the proposed project site. Opportunity Site 1 is approximately 7.5 miles southwest 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 roadways 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 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 a four-lane road with dedicated turn pockets and a center median with sufficient capacity to accommodate project traffic. Existing operating conditions at the 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.



Source: Data compiled by AECOM in 2018

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

- *Feasibility*—The parcels that make up Opportunity Site 1 would have to be acquired by the project applicant, which would require multiple negotiations between willing sellers 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 go as far toward meeting the project objectives as development at the proposed project site. 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 served by adequate existing infrastructure, including roadways and utilities.
  - Locate warehouse retail uses so as not to conflict with the character, scale, and architecture of the historic central business district.

6.3.2 Off-Site Location at Opportunity Site 2

Opportunity Site 2 is 13.0 acres and consists of two vacant parcels designated for Office Commercial (CO) land uses. The CO designation is intended for general business, professional, and medical offices. 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 for planning purposes (i.e., large enough to accommodate the minimum square footage required for the warehouse). Similar to the CG zone of the proposed project site, warehouse retail is not a permitted or conditionally permitted use in the CO zone.
- *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.
- *Avoidance or lessening of environmental effects of the project*—Development at Opportunity Site 2 would likely 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, similar to the proposed project site. Opportunity Site 2 is approximately 7 miles southwest 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 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 project traffic. Existing operating conditions at the 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*—Opportunity Site 2 is the subject of a larger development application (The Village of Loomis) being reviewed by the Town, which makes acquisition and assembling parcels difficult or impossible.
- *Ability to accomplish project objectives*—Development at Opportunity Site 2 would not go as far toward meeting the project objectives as development at the proposed project site. 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.
  - Improve Loomis's commercial base to increase municipal revenues and provide a wider range of goods and services for local residents, in addition to encouraging commercial uses near the freeway.

- 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 near existing interchanges to minimize impacts on the town.
- Locate warehouse retail on land sufficient to provide the necessary facilities for these types of uses.

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 (CG) 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 at Opportunity Site 3 would not be consistent with goals 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. Further, Opportunity Site 3 consists of noncontiguous parcels, which is not conducive to a warehouse retail use that requires a minimum land area (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 sufficient capacity to accommodate project traffic. Existing operating conditions at the 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 likely 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 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 to the two locations are very different. Opportunity Site 3 is approximately 5.5 miles southwest of the existing Roseville Costco warehouse.
- *Feasibility*—The 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. 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 of Opportunity Site 3 would not meet any of the project objectives. With selection of this alternative, the following project objectives would be either not met or only partially met:
  - Improve Loomis's commercial base to increase municipal revenues and provide a wider range of goods and services for local residents, in addition to encouraging commercial uses near the freeway.
  - 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 near existing interchanges to minimize impacts on the town.

- Locate warehouse retail uses 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.

6.4 Alternatives Selected for Consideration

The Town of Loomis has selected three 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.[1]

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.[2] 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 (CG) land use designation are oriented toward local residents and businesses, 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 (RH) General Plan designation is oriented toward multifamily housing, including duplexes, townhouses, and apartments.

Under Alternative 1B, approximately 14 acres of the site designated as CG by the General Plan are forecast for development with a range of commercial uses, including a quality sit-down restaurant, business services such as an insurance agency, and retail shops on multiple, smaller development pads distributed throughout the property. The

[1] 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).

[2] 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.

remaining 3 acres of the site along the eastern boundary would be developed with townhomes at the maximum permitted density. 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–General	25,000 sq. ft.
Low-Rise Townhome	30 du
Quality Sit-Down 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 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 from mobile and stationary sources (Tables 6-2 and 6-3). Alternative 1B would generate more construction-related and operational emissions of volatile organic compounds (VOCs) than the proposed project. The proposed project would generate greater emissions of oxides of nitrogen (NO_X) and particulate matter than Alternative 1B during operation. In contrast, on an operational basis Alternative 1B would generate more VOCs. All construction activities would be subject to Placer County Air Pollution Control District (PCAPCD) Rule 228 to limit fugitive dust emissions, and both Alternative 1B and the proposed project would implement Mitigation Measures AQ-1a, AQ-1b, AQ-1c, and AQ-1d to reduce construction emissions below threshold levels. Thus, neither alternative is superior with regard to construction emissions.

Operation of the proposed project would result in greater levels of NO_X and PM_{10} than operation of Alternative 1B. However, the analysis does not reflect that the vehicle miles traveled (VMT) analysis in the traffic impact study (Appendix E) determined that a per-trip reduction would result in an overall reduction of regional VMT with operation of the proposed project. The emissions estimates in Table 6-3 present emissions only for assumed new trips and do not consider the anticipated reduction in VMT that would result from the proposed project, which would place Costco closer to members in the area. More than 99 percent of the estimated NO_X emissions and most particulate matter emissions are attributable to mobile-source operations. Therefore, assuming a net decrease in VMT, the proposed project would generate emissions of NO_X and PM_{10} that would not 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 not reduce VMT as the proposed project would; therefore, levels of VOCs and NO_X would remain 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	70.5	59.6	20.8
Alternative 1B	79	59.6	20.8
Significance Threshold	82	82	82
Exceed Threshold?	No	No	No

Notes:

lb/day = pounds per day; NO_X = oxides of nitrogen; PM_{10} = 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 2017

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	31	182	71
Alternative 1B	84.2	70.9	33.4
Significance Threshold	55	55	82
Exceed Threshold?	Yes (Alt. 1B)	Yes (both)	No

Notes:

Alt. = Alternative; lb/day = pounds per day; NO_X = oxides of nitrogen; PM_{10} = 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 2018

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 (372 trees), 10 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 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 with selection of Alternative 1B. 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 and Energy

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 (10,417 CO_2e vs 17,232 CO_2e), but would exceed PCAPCD threshold for GHG emissions.

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

Emissions Source	GHG Emissions (MT CO_2e/year)
Construction GHG Emissions	
Maximum Annual Construction Emissions	324
Operational GHG Emissions	
Area	68.701
Energy	721
Mobile	4,305
Waste	122
Water	55
Total Annual Operational Emissions**	**5,272**
PCAPCD Bright-Line Threshold	**10,000**
Exceeds Threshold?	**No**
Total Annual Operational Emissions per 1,000 Square Feet	**34**

Notes:

CO_2e = 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); buildings make up approximately 155,000 square feet.

** Totals do not add due to rounding.

Source: Modeled by AECOM in 2018. See Appendix I 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, similar to the proposed project.

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, noise levels along studied roadways are expected to be louder than those associated with the proposed project.

With regard to stationary-source noise, Alternative 1B could avoid the significant 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 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 12,110 average daily trips (ADT), or 4,264 daily trips when consideration of pass-by[3] and diverted trips[4] is applied to the proposed project. In comparison, operation under Alternative 1B would generate 4,927 ADT (Table 6-5), or 663 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

[3] 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.

[4] 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.

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.

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	30 du	174	30	35
932	Quality Sit-Down Restaurant	10	1,275	108	99
TOTAL			**4,927**	**249**	**449**

Notes: Alt. = Alternative; du = dwelling units; ITE = Institute of Transportation Engineers; KSF = thousand square feet
Sources: ITE 2012; data compiled by AECOM in 2017

Ability to Accomplish Project Objectives

Development of the site as outlined under Alternative 1B would not go as far toward meeting the project objectives when compared to the proposed project. The following project objectives would be either not met or only partially met with selection of this alternative:

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.
- 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.
- Provide a state-of-the-art Costco warehouse to serve Costco's membership in the greater Loomis area.
- 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.

Town of Loomis Objectives

- Locate warehouse retail uses near existing interchanges to minimize impacts on the town.
- Locate warehouse retail uses 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.

6.4.2 Alternative 2: No Fueling Station

The No Fueling Station Alternative would remove the proposed 24-dispenser fueling station (expandable to 30 pumps) included in the proposed project. The remainder of the site layout would remain unchanged from that of the proposed project. This alternative would reduce the expected vehicular trips to and from the project site, thereby reducing several potentially significant impacts related to air quality, biology 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 reduce the development footprint by approximately 1.7 acres and 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 less area requiring architectural coatings during construction and the number of vehicular trips would be reduced on a daily basis during operations (Tables 6-6 and 6-7). All construction activities would be subject to PCAPCD Rule 228 to limit fugitive dust emissions, and would implement Mitigation Measures AQ-1a through AQ-1d to reduce emissions of criteria air pollutants from short-term construction activities. As with the proposed project, Alternative 2 would reduce total VMT by placing a warehouse retail store closer to the customer base, which would reduce mobile-source emissions. More than 99 percent of the estimated NO_X emissions and most particulate matter emissions are attributable to mobile-source operations.

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. Neither the proposed project nor Alternative 2 would generate air pollutant emissions that would exceed adopted thresholds or 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 6-6. Comparison of Construction-Related Emissions: Proposed Project versus Alternative 2

	Criteria Pollutant Emissions (lb/day)		
	VOCs	NO_X	PM_{10}[1]
Proposed Project	70.5	59.6	20.8
Alternative 2	68.7	59.6	20.8
Significance Threshold	82	82	82
Exceed Threshold?	No	No	No

Notes:

lb/day = pounds per day; NO_X = oxides of nitrogen; PM_{10} = 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 2018

Table 6-7. Comparison of Operational Emissions: Proposed Project versus Alternative 2

	Criteria Pollutant Emissions (lb/day)		
	VOCs	NO_X	PM_{10}[1]
Proposed Project	31	182	71
Alternative 2	21.3	116.9	45.6
Significance Threshold	55	55	82
Exceed Threshold?	No	Yes (Both)	No

Notes:

lb/day = pounds per day; NO_X = oxides of nitrogen; PM_{10} = 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 2018

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 (372 trees), 10 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 2, grading activity would result in permanent disturbance of 15.3 acres. 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 (352 trees affected vs. 372 trees for the proposed project). 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 land use plan because of their distribution across the project site.

6.4.2.4 Greenhouse Gases and Energy

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 result in fewer emissions of CO_2e (Table 6-8), compared to the proposed project (11,406 CO_2e compared to 17,232 CO_2e) and would result in less emissions per 1,000 square foot on annualized basis than does the project (75 CO_2e /1000 square foot compared to 110 CO_2e/1000 square foot).

Table 6-8. Modeled Greenhouse Gas Emissions for Construction and Operations of Alternative 2

Emissions Source	GHG Emissions (MT CO_2e/year)
Construction GHG Emissions	
Maximum Annual Construction Emissions	266
Operational GHG Emissions	
Area	0.018
Energy	651
Mobile	10,386
Waste	329
Water	40
Total Annual Operational Emissions**	**11,406**
PCAPCD Bright-Line Threshold	**10,000**
Exceeds Threshold?	**YES**
Total Annual Operational Emissions per 1,000 Square Foot	**75**

Notes:

CO_2e = 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 156,336 square feet of the site.

** Totals do not add due to rounding.

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

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. Because Alternative 2 would increase daily vehicular trips compared to the proposed project, noise levels along studied roadways are expected to be louder than those associated with the proposed project, but would not represent a perceptible increase or exceed adopted standards. With regard to stationary noise sources, Alternative 2 would consist of multiple, smaller development pads that would provide greater flexibility in layout of the delivery docks, to avoid the potential for heavy trucks to increase interior noise levels beyond accepted standards when nighttime deliveries occur. Reconfiguring the layout of the development pads to remove access by delivery trucks from the Brace Road entry would reduce the significant unavoidable impact associated with the proposed project. As with the proposed project, on-site noise sources and traffic noise would not be significantly higher than ambient noise levels experienced under current conditions.

6.4.2.6 Transportation and Traffic

Development of the site under Alternative 2 would generate 7,771 daily trips before consideration of pass-by and diverted trips and 5,051 with consideration these two variables. In comparison, the proposed project would generate 12,110 daily trips before pass-by and diverted trips are considered and 4,264 daily trips with application of these factors. Therefore, Alternative 2 would reduce ADT by 787 daily trips (Table 6-9) when compared to the proposed project. 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.

Table 6-9. Vehicular Trip Generation under Alternative 2

ITE Code	Description	Units (KSF)	Daily	Total Vehicular Trips	
				A.M. Peak Hour	P.M. Peak Hour
813	Freestanding Discount Store	152	7,771	659	669
TOTAL Alt. 2			**7,771**	**659**	**669**

Notes: Alt. = Alternative; ITE = Institute of Transportation Engineers; KSF = thousand square feet
Sources: ITE 2012; data compiled by AECOM in 2017

6.4.2.7 Ability to Accomplish Project Objectives

Development of the site as outlined under Alternative 2 would not go as far toward meeting the project objectives when compared to the proposed project. The following project objectives would be either not met or only partially 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.
- 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.

Town Objectives

Expand the space available for integrated retail sales of goods and services in Loomis.

6.4.3 Alternative 3: Reduced Floor Space

Alternative 3 would decrease floor space of the proposed warehouse structure by 20 percent compared to the proposed project. The 24-dispenser fueling station (expandable to 30 pumps) 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 152,101 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 less land disturbance as the development footprint is reduced by approximately 0.6 acre compared to the proposed project. 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. Site development under Alternative 3 would remove slightly less oak woodland canopy when compared to the proposed project as the development footprint would be slightly smaller in size (0.6 acres). Under either the proposed project or Alternative 3, a final landscape plan would be prepared that incorporates 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 generate less construction-related emissions than the proposed project (Table 6-10) due to the reduced development footprint (0.6 acres) and smaller building size of the warehouse which would require less architectural coating than the proposed project. All construction activities would be subject to PCAPCD Rule 228 to limit fugitive dust emissions, and would implement Mitigation Measures AQ-1a through AQ-1c to reduce emissions of criteria air pollutants from short-term construction activities.

Operational emissions would be similar to the proposed project (Table 6-11) because the project is a membership based retail store with a specific market demographic so patronage of the store would be similar to that of proposed project. As with the proposed project, Alternative 3 would reduce total VMT by placing a warehouse retail store closer to the customer base. Since more than 99 percent of the estimated NO_X emissions and most particulate matter emissions are attributable to mobile-source operations traveling on the roadway network, both the proposed project and Alternative 3 could 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 6-10. Comparison of Construction-Related Emissions: Proposed Project versus Alternative 3

	Criteria Pollutant Emissions (lb/day)		
	VOCs	**NO_X**	**PM_{10}[1]**
Proposed Project	70.5	59.6	20.8
Alternative 3	57.0	59.6	20.8
Significance Threshold	82	82	82
Exceed Threshold?	No	Yes (Project)	No

Notes:

lb/day = pounds per day; NO_X = oxides of nitrogen; PM_{10} = 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 2018

Table 6-11. Comparison of Operational Emissions: Proposed Project versus Alternative 3

	Criteria Pollutant Emissions (lb/day)		
	VOCs	**NO_X**	**PM_{10}[1]**
Proposed Project	31	182	71
Alternative 3	30	182	71
Significance Threshold	55	55	82
Exceed Threshold?	No	Yes (Both)	No

Notes:

lb/day = pounds per day; NO_X = oxides of nitrogen; PM_{10} = 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 2018

6.4.3.3 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 (372 trees), 10 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 0.6 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 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 land use plan because of their distribution across the project site.

6.4.3.4 Greenhouse Gases and Energy

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 result in slightly less annual operational emissions of CO_2e (Table 6-13), compared to the proposed project (17,102 CO_2e compared to 17,232 CO_2e) but would result in greater emissions per 1,000 square foot on annualized basis than does the project (138 CO_2e /1000 square foot compared to 110 CO_2e/1000 square foot).

Table 6-12. Modeled Greenhouse Gas Emissions for Construction and Operations of Alternative 3

Emissions Source	GHG Emissions (MT CO_2e/year)
Construction GHG Emissions	
Maximum Annual Construction Emissions	261
Operational GHG Emissions	
Area	0.018
Energy	535
Mobile	16,187
Waste	337
Water	42
Total Annual Operational Emissions**	**17,102**
PCAPCD Bright-Line Threshold	**10,000**
Exceeds Threshold?	**YES**
Total Annual Operational Emissions per 1,000 Square Foot	**138**

Notes:

CO_2e = 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 2018. 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. Due to the membership nature of the Costco Warehouse, it is assumed that Alternative 3 would result in a similar number of daily vehicular trips as the proposed project, so noise levels along studied roadways and parking lots are expected to be comparable. With regard to stationary noise sources, Alternative 3 would increase the number of nighttime deliveries because the reduction in storage space means more trips are needed to deliver the same amount of goods. Increased heavy truck trips would exacerbate the significant impact experienced at those apartment units located in the Sierra Meadows Apartment building facing the delivery entrance.

6.4.3.6 Transportation and Traffic

Due to the membership model of the Costco Warehouse, Alternative 3 is expected to draw a similar amount of members (and vehicle trips) to the store that would otherwise travel to Roseville. Thus, impacts to studied roadway segments and intersections are similar under Alternative 3 to those identified for the proposed project. 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 Ability to Accomplish Project Objectives

Development of the site as outlined under Alternative 3 would not go as far toward meeting the project objectives when compared to the proposed project. The following project objective would be either not met or only partially 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.

6.5 Environmentally Superior Alternative

Table 6-14 summarizes the environmental impacts of each alternative to that of the proposed project. A detailed comparison is presented and the environmentally superior alternative is identified below. CEQA provides that an EIR must 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 2; Reduced Floor Space is considered to be the environmentally superior alternative.

Alternative 1B: This alternative assumed a range of commercial uses, including a quality sit-down restaurant, business services such as an insurance agency, and retail shops on multiple, smaller development pads distributed throughout the property. Table 6-14 illustrates that this alternative would result in impacts in five 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. Alternative 1B would disturb similar amounts and types of habitat as the proposed project, would require construction activity that would generate noise levels in excess of standards, would generate more vehicular trips (4,927 ADT compared to 4,264 ADT), would generate greater air pollutant

emissions (79 pounds per day [lb/day] VOCs compared to 66.7 lb/day VOCs for the proposed project). Alternative 1B would not construct a Costco warehouse in a location served by adequate existing infrastructure, including roadways and utilities.

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 nine basic project objectives.

Table 6-13. 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
Aesthetics				
Degrade the existing visual character of the project site and surroundings	Less	Less	Equal	Equal
Create substantial light or glare	Less	Equal	Equal	Equal
Air Quality				
Conflict with or obstruct implementation of the applicable air quality plan	Less	Greater	Equal	Equal
Violate any air quality standard or contribute substantially to an existing or projected air quality violation	Less	Greater	Less	Equal
Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)	Less	Greater	Less	Equal
Expose sensitive receptors to substantial pollutant concentrations	Less	Equal	Less	Equal
Create objectionable odors affecting a substantial number of people	Less	Equal	Equal	Equal
Biology				
Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Wildlife or USFWS	Less	Less	Less	Less
Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the CWA (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means	Less	Less	Less	Less

Table 6-13. 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
Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites	Less	Equal	Equal	Equal
Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance	Less	Equal	Equal	Equal
Greenhouse Gases and Energy				
Generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment	Less	Less	Less	Less
Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs	Less	Less	Less	Less
Noise				
Expose persons to or generate noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies	Less	Equal	Equal	Greater
Expose persons to or generate excessive groundborne vibration or groundborne noise levels	Less	Equal	Equal	Equal
Result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project	Less	Less	Less	Greater
Result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project	Less	Equal	Less	Equal
Transportation and Traffic				
Conflict with an applicable plan, ordinance, or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and nonmotorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit	Less	Greater	Less	Equal

Table 6-13. 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
Conflict with an applicable congestion management program, including, but not limited to the level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways	Less	Greater	Less	Equal
Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)	Less	Equal	Equal	Equal
Result in inadequate emergency access	Less	Equal	Equal	Equal
Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities	Less	Equal	Equal	Equal

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 impacts that are less than or equal to those for the proposed project. Alternative 2 would disturb less land (15 acres compared to 17.4 acres for the proposed project) remove fewer oaks, would generate fewer vehicle trips (7,771 ADT compared to 12,110 ADT), and would generate less criteria air pollutants than the proposed project. Operation of Alternative 2 would also generate fewer greenhouse gas emissions (CO_2e) than the project. Alternative 2 would reduce the unavoidable significant traffic impact along Sierra College Boulevard compared to the proposed project, but would not avoid or lessen the significant unavoidable noise impact experienced at Sierra Meadows apartment units that face the delivery entrance. Alternative 2 would fail to meet or fully achieve three of the basic project objectives.

Alternative 3 (Reduced Floor Space) would result in impacts that are equal to or less than those for the proposed project. Alternative 3 would disturb less land (16.4 acres compared to 17 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 compared to the proposed project and would likely increase nighttime interior noise standards at the Sierra Meadows Apartments. Alternative 3 would fail to meet or fully achieve one of the basic project objectives.