

February 10, 2020

Via Hand Delivery and E-mail

Town of Loomis
c/o Costco Comments
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Re: Costco Recirculated Draft EIR (December 2019)(SCH# 2017052077)

To Whom It May Concern:

This letter is submitted on behalf of the City of Rocklin. Because the proposed Costco wholesale-to-public store (the “Project”) is proposed on Rocklin’s border, Rocklin has a critical interest in ensuring the Project will be properly analyzed and mitigated so that it does not directly and adversely affect City of Rocklin residents, streets and nearby commercial enterprises (existing and potential). While the City of Rocklin appreciates that the Town of Loomis has met with the City to address its concerns on numerous occasions; unfortunately, many outstanding issues and concerns remain. The City of Rocklin remains committed to working with the Town of Loomis for the purpose of resolving those concerns.

Attached is a detailed analysis prepared by Fehr & Peers regarding the evaluation of traffic impacts. (**Exhibit 1.**) As discussed below and detailed further in the exhibits, the Recirculated Draft EIR (“RDEIR”) includes critical errors in the identification, evaluation and mitigation of impacts. As a consequence, these analytical errors also undermine the accuracy of the analysis of other critical environmental issues such as Air Quality, Vehicle Miles Traveled (“VMT”), Greenhouse Gases (“GHG”), and Noise. City of Rocklin staff have also reviewed the RDEIR and detailed their additional comments for your review and consideration. (**Exhibit 2.**) As discussed below and detailed further in the exhibits, the RDEIR also includes critical analytical errors of Aesthetic Impacts, Air Quality, Alternatives, and Public Safety. The City of Rocklin requests that the RDEIR and Project be modified to address the issues identified in this letter, which includes the exhibits which are incorporated into this comment letter in full.

I. The Traffic Impact Study Is Fundamentally Flawed And Traffic Impacts Must Be Re-Evaluated To Disclose Unidentified Significant Impacts Of The Project.

The Traffic Impact Study (“TIS”) suffers from several fundamental flaws that undermine its conclusions that the significant impacts of the Project have been accurately identified and mitigated to the extent feasible as required by CEQA. These flaws, described more fully below and in the attached letter from Fehr & Peers outlining their analytical review of the TIS, include unsupported and implausible assumptions, as well as questionable modeling and analysis choices, all of which

have led to the failure to (1) identify numerous Level of Service and Queuing impacts of the Project; and (2) disclose those impacts to decision makers and the public.

a. The TIS Is Premised On Several Flawed Assumptions That Lead To An Understatement Of The Project's Actual Impacts.

The RDEIR makes several problematic choices regarding traffic assumptions, such as traffic generation rates, pass-by trips, distribution routes, and growth projections, that undermine the subsequent analysis of the Project's impacts, no matter how rigorous and thorough the subsequent analysis may have been. The consequences of these flawed decisions are that the RDEIR's conclusions are inaccurate and substantially understate the Project's impacts on the area's streets and highways.

i. Fueling Station Assumptions Are Not Supported By Substantial Evidence.

The RDEIR supports its trip-generation rate assumptions based upon a Costco-generated study of its own stores—which notably is not included in the TIS and, thus, cannot be independently verified for its rigor and comparative value to the Project—to conclude that its assumptions for overall trip generation, pass-by and diverted trip rates are reasonable (TIS, p. 59). As Fehr & Peers notes in its comments, however, there are serious defects in those assumptions.

While the TIS notes that the unidentified list of studied Costco sites included only Costco sites with fueling stations, there is no information about how many fueling pumps were included in the selected fueling station sites. Also, given that there are nearly 600 Costco sites with fueling stations, it's impossible to know if the studied sites were a true representative sample of operations similar to the Project. Attachment A to the Fehr & Peers letter shows that a 2011 study of 40 Costco sites around the country prepared by the Project's traffic engineer only included Costco sites that had 20 or fewer fueling pumps at each site—far fewer than the 30 fueling pumps proposed for the Project. The 2011 study also shows that every additional fueling pump adds an additional 27 Weekday PM peak hour trips. These trips are unaccounted for in the RDEIR's trip generation assumptions and ultimately lead to an understatement of the Project's actual impacts as a result.

Furthermore, the TIS assumes, without evidence, that the same pass-by and diverted trip rates identified in this same undisclosed study applies to the weekday daily trips generation assumption. (Compare TIS, Table 11 ["no data"] to TIS, Table 12 ["(4,090)" and "(3,870)"].) This assumption is contradicted by the ITE Trip Generation Manual (2017) which demonstrates that the percentage would be lower during non-commute periods which means the RDEIR understates the daily trip generation rate for the Project.

The RDEIR similarly makes unsupported assumptions when analyzing vehicle queuing impacts of the fueling station operations. The TIS relies on data from five existing Costco fueling station operations, none of which exceed 24 fueling stations, to conclude that queuing from the Project's 30 fueling pump station operation would not impact Project Driveway operations (TIS, p. 90). It does so by

asserting, without evidence, that queuing would “be shorter given the ability to fuel more vehicles simultaneously at the Project site.” Furthermore, the TIS relies on an average which includes a project site in Oregon which is operationally distinct from operations in California and should not have been included. In Oregon, motorists, by law, are not allowed to dispense their own fuel and operations are actively managed by store personnel.

With the reasonable exclusion of the Oregon site, the average 95th percentile queue per pump would be 1.16 vehicles which equates to 35 vehicles in the queue, five vehicles more than the 30 queuing spaces relied upon in the TIS. And even under the TIS’s analysis which assumes 1.042 vehicles per pump, when multiplied by the 30 pumps at the station would also exceed the queuing capacity of the fueling station and inevitably lead to queue spillback into the Project driveway. Any spillback into the Project driveway would be anticipated to cause additional spillback onto Sierra College Boulevard.

ii. Pass-By Trips Are Unsupported And Overstated.

The same reliance on undisclosed data is used to support the assumption of overly generous pass-by rates that lead to a dramatically understated number of new trips generated by the Project. A comparison of the assumptions to widely available demographic data demonstrates that these pass-by rate assumptions are simply not reasonable or realistic.

The top 20 zip codes projected to be served by the Project account for approximately 45,000 members, all who will need to travel an average of 22 miles to reach the Project site. For sake of analysis, we generously assumed one-third of Costco members that happen to be already driving on Sierra College Boulevard (on the way to their ultimate destination)(See TIS, p. 58), decides to stop into the Project site. In order for the RDEIR’s pass-by rate assumptions to be reasonable, it would require that 27% of all weekday PM peak hour vehicles and 45% of all Saturday midday peak hour vehicles along Sierra College Boulevard are Costco members. This is supposed to be accepted as reasonable even when considering the fact that: (1) only approximately 20% of all adults in the top 20 zip codes to be served by the Project are projected to be members; and (2) these members would need to drive 22 miles away on average so they could happen to be driving down Sierra College Boulevard during these peak periods on their way to a different destination other than Costco. It is simply unreasonable to assume a sufficient number of Costco members, which account for only 20% of the adult population in the area, would consistently drive 22 miles away on average to a small section of Sierra College Boulevard every Saturday during the peak hour in order to account for nearly 50% of the total vehicle trips on that section of Sierra College Boulevard.

iii. The Share of Trips Leaving The Project On Brace Road Is Unrealistically Low.

The TIS assumes that only 3% of the vehicle trips leaving the Costco site will leave via the northern exit to eastbound Brace Road, and none of those trips are presumed to use the I-80/Horseshoe Bar Road interchange (TIS, Fig. 8A). This assumption seems extremely unlikely and will severely understate reasonably foreseeable impacts on the I-80/Horseshoe Bar Road interchange. Fehr & Peers conducted weekday PM peak hour travel time runs and prepared a micro-simulation analysis of the two primary options to reach eastbound I-80: (1) heading southbound on Sierra College Boulevard to the eastbound I-80 on-ramp; and (2) heading eastbound on Brace Road to Horseshoe Bar Road. (See Exhibit 1, paragraph 4.) This analysis shows that the net result of the travel time for Option 1 would be about 100 seconds longer than traveling via Option 2. With the proliferation of mobile phone travel apps and improved GPS that are designed to identify the quickest route to a user's next destination, it is extremely likely that the TIS's presumption that 35% of Project trips will leave for eastbound I-80 via Sierra College Boulevard and only 3% will leave through Brace Road is deeply flawed and fails to identify likely impacts on the I-80/Horseshoe Bar Road interchange.

iv. The Cumulative Buildout Assumptions Fail To Account For Several Reasonably Foreseeable Development Projects.

The cumulative long-term no project traffic forecast fails to account for at least four different reasonably foreseeable development projects that would add a substantively considerable amount of additional traffic volume to the system, undermining the accuracy of the RDEIR's analysis. The following buildout assumptions must be included in the RDEIR's cumulative scenarios:

1. *Granite Marketplace* – This is a currently pending project being considered by the City of Rocklin since August 2018, located just south of the Project site that consists of approximately 153,000 square feet of retail development that will be entirely accessed through the eastern leg of the Granite Drive/Sierra College Boulevard intersection. The RDEIR assumed only 100 PM peak hour vehicles which is far short of the ITE Manual's projection of 575 vehicles for this amount of development.
2. *Sierra College Master Plan* – Sierra College adopted an updated Facilities Master Plan in 2019 to accommodate a 50% increase in student population over the next 20 years. While the RDEIR does account for approximately 64% of the trips projected for the Campus' entrance off Sierra College Boulevard, there appears to be no justification for why the scenario did not account for the full amount of vehicle trips identified in the FMP's EIR.
3. *College Park Residential Project* – This project is a pending project being considered by the City of Rocklin since January 2017, and consists of up

to 425 dwelling units and commercial uses near the corner of Rocklin Road and Sierra College Boulevard. The residential portion of this project would access Sierra College Boulevard using a new fourth leg of the Sierra College Boulevard/Stadium Way intersection. Neither this fourth leg, nor its anticipated trips, are included in the cumulative conditions scenario.

4. *Undeveloped Commercially-Zoned Property West of Project Site* – It is unclear whether the RDEIR included any buildout of this site in the cumulative scenario, but it did assume 296 weekday PM peak hour vehicle trips would use the presumed west leg of the Project Driveway intersection. This decision to assign a relatively low number of trips to the site was apparently made in spite of the fact that this is expected to be the primary entrance for the commercially-zoned site given its direct access to Sierra College Boulevard. The City of Rocklin’s 2030 Travel Demand Model expects the site to yield approximately 184,400 square feet of retail commercial space which the ITE Manual would project trip generation to be 855 weekday PM peak hour trips, nearly triple that assumed in the RDEIR.
- v. *The Cumulative Lane Configuration Assumptions Fail To Account For Several Reasonably Foreseeable Circulation Network Improvements.*

The cumulative circulation network assumptions failed to include several planned improvements within the study area and must now be re-run:

1. *Northbound Sierra College Boulevard Improvements* – The cumulative scenario incorrectly identifies northbound Sierra College Boulevard north of Rocklin Road to Bass Pro Drive as two-lanes when a third lane has long been planned for that stretch of Sierra College Boulevard and has been presumed in numerous City of Rocklin studies. Intersection Level of Service (“LOS”) results at Sierra College Boulevard/Stadium Driveway and Sierra College Boulevard/Rocklin Road are therefore inaccurate.
2. *Pacific Street Improvements* – The City of Rocklin has long-planned to widen Pacific Street to four lanes from Midas Avenue to its easterly city limits. Intersection LOS results at the Pacific Street/Delmar Avenue/Dominguez Road intersection are therefore inaccurate.
3. *Pacific Street/Rocklin Road intersection* – A multi-lane roundabout is planned for this intersection, but it is not included in the cumulative scenario.
4. *Sierra College Boulevard/Taylor Road intersection and Sierra College Boulevard b/w Taylor Road & Brace Road* – The Town of Loomis recently released an Initial Study/Mitigated Negative Declaration** for this road improvement project which includes planned lane configurations which are inconsistent with the assumed improvements in the RDEIR.



Figure 3. Project Features

** Sierra College Boulevard Widening between Brace Road and Taylor Road Project Initial Study/Mitigated Negative Declaration dated December 2, 2019.

- b. The TIS Relies On An Outdated Traffic Modeling Program And Fails To Complete A Micro-Simulation Analysis That Is Recommended By (1) The Readily Available And Widely Used Updated Version Of The Highway Capacity Manual; And (2) The Relevant Academic Literature On Corridors Like Sierra College Boulevard.

The RDEIR’s traffic impacts discussion relies on the TIS’s use of the *2010 Highway Capacity Manual* (“2010 HCM”) to analyze impacts on area roadways from the Project. But, even though the TIS was updated in 2019, it was not completed using the more recent version

of the *Highway Capacity Manual* that was updated and available for use since 2016 (“2016 HCM”). The RDEIR or the TIS should explain why the outdated 2010 HCM methodology more accurately describes the impacts of the Project than the widely available and widely used 2016 HCM would, since it was available for several years prior to the preparation of this TIS. In addition, both the 2016 HCM and academic guidance on traffic analyses recommend that the Sierra College Boulevard corridor should be analyzed using micro-simulation in order to accurately identify the impacts of the Project. This was not done and the RDEIR and TIS should explain why this widely available micro-simulation model—which was used in the TIS only for the limited purpose of identifying travel time and speeds in the Sierra College Boulevard corridor—was not properly used despite its industry-accepted superior ability to identify and evaluate LOS and Queuing impacts on corridors such as Sierra College Boulevard.

To demonstrate the flaws in using the 2010 HCM and its deterministic methods for analyzing intersections, particularly in situations involving tight signalized intersection spacing on arterial roadways, one need only look to the TIS’s description of existing weekday PM peak hour conditions at the intersection of Rocklin Road/Aguilar Road. The TIS states that this intersection operates at LOS A under existing conditions, while on the ground conditions of westbound traffic queues are known to routinely extend as far back as the Sierra College campus during the weekday PM peak hour. This is the result of upstream queue spillback and imbalanced lane utilization due to heavy use of the left-hand turn lane for the I-80 westbound on-ramp, something that can only be fully captured using micro-simulation. The fact that the TIS failed to accurately describe existing conditions raises serious concerns as to the accuracy of projected traffic conditions and impacts, particularly in and around the Sierra College Boulevard corridor.

In order to evaluate the accuracy of the TIS prepared for the Project, the City of Rocklin contracted with Fehr & Peers to perform a proper micro-simulation analysis of the corridor. The Fehr & Peers study used the same traffic volumes and lane configurations used in the RDEIR to ensure an accurate comparison, including use of the RDEIR’s flawed pass-by trip rate assumptions which if fixed would likely identify even more undisclosed traffic impacts. The micro-simulation analysis demonstrates that Project impacts are substantially understated as the combined use of 2010 HCM and its deterministic analysis methods fails to identify numerous Queuing and LOS impacts of the Project.

i. Use Of The Outdated Modeling Program Led To The TIS’s Failure To Identify Several Significant Queuing Impacts Of The Project.

Analyzing the traffic data and assumptions from the RDEIR in the micro-simulation model identified at least eight (8) instances in which the Existing plus Project scenario would have a 95th percentile queue that exceeds the available storage, all of which should have been considered significant impacts. The micro-simulation identified sixteen (16) such instances in the Cumulative Short-Term plus Project scenario, all of which should have been identified as significant impacts. The Cumulative Long-Term plus Project shows extensive queuing impacts throughout the Sierra College Boulevard corridor, including queuing impacts on Sierra College Boulevard south of Bass Pro Drive. One particularly noteworthy unidentified queuing

impact is on the I-80/Sierra College Boulevard Westbound Off-Ramp. The Fehr & Peers study demonstrates that the 2010 HCM understates the projected 95th Percentile weekday PM peak hour queue lengths by a factor of three (3) under the cumulative short-term scenario, and **a factor of ten (10)** under the cumulative long-term scenario.

It is also important to note that the RDEIR's assertion that the Project will have less-than-significant queuing impacts at the Project Driveway are at odds with data from its own analysis. Both the TIS data (Table 72; pp. 1618 and 1723) and the Fehr & Peers analysis show that there will be significant queuing impacts at the Sierra College Boulevard/Project Driveway intersection for the NB-through, SB-through, and WB-left turn lanes under Cumulative Long-Term plus Project weekday PM peak hour conditions, without and with the recommended mitigation measures. The Fehr & Peers analysis further identified an undisclosed significant queuing impact even with mitigation at the NB-right turn lane as well. The Project will, thus, lead to substantial queue spillbacks into the Sierra College Boulevard/Granite Drive intersection, the Sierra College Boulevard/Brace Road intersection, and within the Costco site itself, all of which will create hazardous conditions on the Sierra College Boulevard corridor. The RDEIR must be revised to correctly identify these significant impacts and the Project must adopt additional mitigation to address them.

The City of Rocklin has previously proposed that Loomis require the Project to mitigate impacts on the Sierra College Boulevard corridor through modification of the proposed entryway. It does so again here. City staff proposes the following:

- Relocate the Project Driveway at least 100 feet to the north to more centrally locate the entrance into the Project site.
- Add a one-lane right-in only entrance at the same location as the existing Project Driveway to provide direct access to the fueling station.
- Construct dual SB-left turn lanes into the Project site with two receiving lanes into the parking lot.

These changes would directly address these previously unidentified and unmitigated significant impacts by:

- Providing additional storage for the NB-through lane;
- Providing more storage capacity for the NB-right turn lane;
- Improving overall traffic operations due to more balanced lane utilization;
- Adding an additional entry point to disperse traffic entering the site; and
- Addressing SB queue spillback issues, as well as increasing available green time for allocation to NB-through lane traffic.

This approach is not uncommon as is illustrated in the following examples in Northern California:



Ex. 1 – Sam's Club Retail Store in Yuba City, CA



Ex. 2 – Costco Retail Store in Rancho Cordova, CA

ii. *Use Of The Outdated Modeling Program Led To The TIS's Failure To Identify Several Significant LOS Impacts Of The Project.*

Analyzing the traffic data and assumptions from the RDEIR in the micro-simulation model identified the following new, previously undisclosed significant Existing plus Project LOS impacts:

- *Sierra College Boulevard / Taylor Road (Weekday PM Peak Hour)* – degrades from LOS C under existing conditions to an unacceptable LOS D under existing plus project conditions.
- *Sierra College Boulevard / Granite Drive (Weekday PM Peak Hour)* – degrades from LOS C under existing conditions to an unacceptable LOS D under existing plus project conditions.

The micro-simulation analysis identified the following new, previously undisclosed significant Cumulative Short-Term plus Project LOS impacts:

- *Sierra College Boulevard/Taylor Road (Weekday PM Peak Hour)* – operations would worsen from LOS D to F with the addition of project trips.

- *Sierra College Boulevard / Brace Road (Weekday PM and Weekend Midday Peak Hours)* – operations would worsen from LOS D to E with the addition of project trips.
- *Sierra College Boulevard / Rocklin Road (Weekday PM Peak Hour)* – degrades from LOS E to F with the addition of project trips.
- *Sierra College Boulevard/Project Driveway Road (Weekday PM and Weekend Midday Peak Hours)* – would operate at LOS E during the weekday PM and weekend midday peak hours.

The micro-simulation analysis identified the following new, previously undisclosed significant Cumulative Long-Term plus Project LOS impacts:

- *Sierra College Boulevard/Taylor Road (Weekday PM Peak Hour)* – operations would worsen from LOS E to F with the addition of project trips.
- *Sierra College Boulevard / I-80 WB Ramps (Weekday PM and Weekend Midday Peak Hours)* – LOS F operations would be exacerbated to a significant degree with the addition of project trips.
- *Sierra College Boulevard / Bass Pro Drive / Dominguez Road (Weekday PM Peak Hour)* – LOS F operations would be exacerbated to a significant degree by the addition of project trips.
- *Sierra College Boulevard/Project Driveway Road (Weekday PM and Weekend Midday Peak Hours)* – would operate at LOS E during the weekday PM and LOS F during the weekend midday peak hours with the addition of project trips.

iii. *Use Of The Outdated Modeling Program Led To The TIS's Failure To Identify Significant I-80/Sierra College Boulevard Interchange Queuing Impacts.*

Analyzing the traffic data and assumptions from the RDEIR in the micro-simulation model identified the following new, previously undisclosed significant queuing impacts on the I-80/Sierra College Boulevard westbound off-ramp:

- Project would cause the vehicle queue to spill back onto the freeway during the PM peak hour under cumulative short-term conditions.
- Under cumulative long-term conditions, the project would exacerbate queues that already extend a considerable distance onto the freeway.

In addition, the RDEIR and/or the Final EIR should disclose additional information on any past or planned future meetings with Caltrans officials to discuss details such as (but not limited to): the feasibility of the identified improvements, any design exceptions, type of approval process (i.e., encroachment permit versus

PA/ED), lead agency, schedule, cost, etc. This disclosure is necessary so that decision makers and the public can adequately evaluate the viability and timing of proposed mitigation in state rights-of-way.

II. Flawed And Unsupported Assumptions In Daily Trip Generation Rates & Re-Directed Trips Lead To A Substantial Understatement Of Project VMT.

The VMT analysis is similarly defective due to inaccurate and unrealistic assumptions in total daily trip generation and pass-by and diverted trip rates. The first and most fundamental error in the VMT analysis is the misapplication of peak hour pass-by and diverted trip rate percentages to the daily trip generation rate assumptions (because VMT is the product of new daily trips and trip distance), as discussed above in Section I(a)(i). (Compare TIS, Table 11 [“no data”] to TIS, Table 12 [“(4,090)” and “(3,870)”].) Every mis-calculated daily pass-by trip improperly reduced Project VMT by an average of 22 miles, because pass-by trips do not account for any miles on a per trip basis and effectively reduce the total Projected-generated VMT by 22 miles per pass-by trip.

The second, and probably most impactful defect in the trip generation assumptions is demonstrated by necessary and inescapable economic conclusions that result from the VMT calculations. The TIS assumes that the addition of the Loomis Costco site would account for an addition of only 9,100 new Costco members when combined with the Roseville Costco store membership figures (TIS, p. 94). As a result, approximately 91.3% of new trips to the Loomis Costco store are assumed to be re-directed trips from the Roseville Costco store. But a closer look at the data reveals how the assumption is unreasonable. The Project’s VMT analysis assumes that the re-direction of new trips from Roseville to Loomis would reduce new trips to Roseville from 3,815 to 190. This is so because the VMT analysis does not account for more than a minimal amount of newly induced trips generated at the Roseville site as a result of the reduced crowding at the Roseville store. This alone is unreasonable and demonstrates that the trip generation assumptions are erroneous. But, taking these erroneous assumptions to their logical conclusion demonstrates the underlying economic problem.

As cited by Fehr & Peers in its attached letter (See Exhibit 1, paragraph 3), the academic literature on VMT and economic output demonstrates a direct correlation between VMT and gross domestic product (“GDP”). Applying this principle to the VMT assumptions in the RDEIR leads to the inevitable conclusion that by opening the Loomis store, Costco would be *reducing* economic output by 35% on a square-foot basis. To put it more simply, Costco would be proposing to double their operating costs to serve less than 10,000 new members. This only makes economic sense if the new store would induce a sufficient number of new trips to either the Roseville or Loomis store from those existing and new members, neither of which are accounted for in the VMT analysis. Thus, the VMT assumptions must be understated.

III. Analytical Failures In The TIS And VMT Analyses Undermine The Accuracy Of Downstream Impact Analyses For Air Quality, GHG & Noise.

Failing to accurately identify Project trip generation and VMT have ripple effects throughout other sections of the EIR as well. When weekday daily trip rates and the VMT for each of those trips are understated, air quality impacts are understated because the conclusions are based upon factors that rely on correctly identifying the actual number of trips generated by a project and how far they

travel. The same goes for GHG, as fuel consumption is a major contributor to GHG emissions and, thus, any miscalculation of the amount of fuel burned by understating trips and travel lengths will necessarily lead to an understatement of corresponding GHG emissions calculations. Noise calculations must also be updated as roadway noise is understated when new trip generation rate assumptions inaccurately describe the projected number of vehicles that will be using the area roadways.

IV. The Air Quality Analysis Improperly Ignores A Mandatory Loomis General Plan Policy, Fails To Account For Dramatically Lower Purported Emissions Despite No Material Change In Project Since 2018 DEIR.

Table 3.3-4 identifies that short-term construction impacts for the Project would generate NOx emissions in the amount of 76.1 lbs./day for rough grading and 29.8 lbs./day for base for paving. Given that these activities can overlap, the conclusion that NOx emissions would not exceed the 82 lbs./day threshold is questionable without mitigation that would ensure these activities would not otherwise occur on the same day, or other potential mitigation that reduces combined emissions to a less-than-significant level.

Regarding the RDEIR's lack of CO modeling (sometimes called hot-spot analyses) for mobile-source emissions at impacted intersections in Impact 3.3-3, the RDEIR dismisses the mandate to complete CO modeling for impacted intersections in the Loomis General Plan (Natural Resources and Open Space Policy 1.e) in favor of more recently adopted policy by the Placer County Air Pollution Control District ("APCD"). The RDEIR cannot simply ignore a mandatory policy in the Town's general plan and the RDEIR must be revised to include the required CO modeling. This is particularly important when compliance with the Town's policy would be more protective of the public than asserting compliance with the Placer County APCD policy which does not trigger such CO modeling for the Project.

Several other Impact Analyses assert dramatically lower emissions from the Project as compared to the conclusions in the 2018 DEIR (i.e., Impacts 3.3-1 (Generation of Temporary, Short-Term, Construction-Related Emissions of Criteria Pollutants and Precursors), 3.3-3 (Generation of Local Mobile-Source Carbon Monoxide Emissions), 3.3-4 (Exposure to Sensitive Receptors to Toxic Air Contaminant Emissions) and 3.3-5 (Exposure of Sensitive Receptors to Objectionable Odors). This is particularly shocking given the Project has not substantially changed, except to increase the number of fueling pumps, which one would normally expect to find greater impacts not fewer. The RDEIR should explain the discrepancy between the 2018 DEIR analysis and the 2019 RDEIR analysis.

V. The Aesthetics Analysis Fails To Evaluate Inconsistency With Applicable General Plan Policies and Regulations.

All inadequacies in the RDEIR's aesthetics analysis are discussed in more detail in Exhibit 2, prepared by Rocklin staff, but some are summarized below. The comments identify several failures to adequately comply with CEQA requirements.

a. The RDEIR Failed To Analyze The Project's Non-Compliance with GP Policies And Regulations As Required For Designated Urban Areas

The RDEIR correctly notes that the applicable threshold of significance of project impacts on viewsheds is whether that project conflicts with applicable regulations governing scenic quality. But, the RDEIR incorrectly asserts that the Town of Loomis is not located within an urbanized area. (See Impact 3.2-1.) CEQA Guidelines section 15387 defines "urbanized area" as "a central city or a contiguous group of cities with a population of 50,000 or more, together with adjacent densely populated areas having a population density of at least 1,000 persons per square mile." As discussed in the CEQA Guidelines, that determination can be made by looking to U.S. Census maps.

Both the 2000 Census Urbanized Area Map (https://www2.census.gov/geo/maps/urbanarea/uaoutline/UA2000/ua77068/ua77068_00.pdf) and the 2010 Census Urbanized Area Map (https://www2.census.gov/geo/maps/dc10map/UAUC_RefMap/ua/ua77068_sacramento_ca/DC10UA77068_000.pdf) identify Loomis as included in the Sacramento Urbanized Area. Thus, the Aesthetics analysis in the RDEIR is fundamentally flawed because it applied the wrong metric. The analysis must consider compliance with all applicable regulations governing scenic quality as required by CEQA. These include several Loomis General Plan policies identified in the regulatory setting, but never evaluated for project consistency and the potential impacts that could result from non-compliance. The analysis must also consider relevant Loomis General Plan policies that were not identified in the RDEIR including:

- Community Design and Character Policy 3 – Each development project should be designed to be consistent with the unique local context of Loomis. (a) Design projects that fit their context in terms of building form, siting and massing. (b) Design projects to be consistent with a site's natural features and surroundings.
- Community Design and Character Policy 5 – Design projects to minimize the need to use automobiles for transportation. (a) Emphasize pedestrian and bicycle circulation in all projects. (b) Give individual attention to each mode of transportation with potential to serve a project and the Town, including pedestrian, bicycle, transit, rail, and automobile. (c) Plan for trail systems, where appropriate to connect areas of development with natural and recreational resources.
- Community Design and Character Policy 6 – Encourage an active, varied, and concentrated urban life within commercial areas. (a) Create and maintain pedestrian oriented centers of development within commercial areas that contain mixtures of retail, other employment, and other uses. (b) Create clustered and mixed use projects within the Downtown Core centers that combine residential, retail, office and other uses.

- All Downtown/Town Center Area Goals & Policies given that the Project site is located within the Downtown/Town Center Area (Loomis GP, Land Use Element, Fig. 3-3) and is subject to Town Center Master Plan standards and regulations.
- b. The RDEIR Assumes, Without Evidence, That The Project Will Comply With An Applicable Specific, Numerical Standard In Town Regulations.

The RDEIR notes an explicit requirement in Loomis regulation 13.30.080 that requires outdoor lighting not to “produce an illumination level greater than one foot-candle on any property within a residential zoning district,” and simply deems the Project consistent by pointing to shielding and cut-off lenses to assert, without evidence, that the Project will comply with the no more than one foot-candle requirement. (See Table 3.2-1.) The RDEIR should require a lighting study or other similar means of measuring light spill onto the adjacent residential properties in order to conclude that the project is compliant with this development standard.

VI. Alternatives

The EIR’s rejection of alternative sites analysis does not meet CEQA’s requirements. The DEIR evaluates four other potential locations within the Town of Loomis. All come with obvious constraints such that the sites cannot be seriously considered as they are not “reasonable.” None of the sites are consistent with the Town’s General Plan (see analysis 6.3.1-6.3.4). All but one would meet the *optimal* lot size standard established by the applicant (which suggests the 16-acre lot size is *ideal*, but not *required*), though three of the sites (Opportunity Sites 2-4) were rejected, at least in part, for failing to meet the “minimum land area” or was “not conducive” because it failed to meet the 16-acre threshold, without providing any evidence to support the assertion that 13+ acres is insufficient. As to Offsite Opportunity sites 2 and 3, these are facially defective as neither is located near a functioning interchange, which directly pertains to two of the Town’s five objectives. They are also both physically bisected by public roads making them less than desirable for potential project site layouts. These straw man alternatives were set up to fail from the outset.

Thus, the adequacy of the RDEIR turns on what was actually studied. The studied alternatives included two no-project alternatives, along with a no fueling station alternative, a reduced floor space alternative, and a reduced floor space/no fueling station alternative. The RDEIR’s attempt to reject these alternatives fails to meet the requirements of CEQA as the RDEIR (1) now includes revised project objectives that render the range of alternatives unreasonable because two of the four alternatives are not “potentially feasible”; and (2) makes material unsubstantiated assumptions and lacks substantial evidence and critical analysis to support the rejection of these alternatives.

- a. The Evaluation Of Alternative 1B Dramatically Overstates Its Traffic, Air Quality And GHG Impacts.

The discussion and analysis of Alternative 1B (No Project/Future Development) (Section 6.4.1.2) appears to be severely flawed. Despite representing the type of generic mixed use project that should have substantially reduced the number of vehicle trips that would be generated at the site, the analysis concludes that trip generation would be materially

greater than a 155,000 square foot warehouse retail facility and 30 pump fueling station. This cannot be accurate. It appears as though the trip assumptions for Alternative 1B were overstated, because the pass-by and diverted trip assumptions that were applied to the Project were not applied to the future development scenario. This decision also led to an overstatement of air quality and greenhouse gas impacts, since they both rely on mobile source emissions from new daily trips. This may simply be an inadvertent error, since there is no established reasoning or factual basis to conclude that the future development scenario would not be eligible for similar pass-by and diverted trip assumptions. Nonetheless, the analysis is insufficient unless it either corrects the error or provides the necessary data and reasoning to support the RDEIR's failure to provide a similar credit for pass-by and diverted trips to Alternative 1B.

b. Alternatives 2 and 4 Are No Longer Potentially Feasible Alternatives After Revision Of Project Objectives.

The DEIR sets forth eleven applicant objectives and five Town objectives (Section 6.2.1). When the prior DEIR concluded that the no-fueling-station alternative "would not go as far toward meeting the project objectives when compared to the proposed project," the City of Rocklin's previous comment letter noted that the DEIR used the wrong metric when it relied upon two applicant objectives and one Town objective to make that conclusion. The RDEIR, however, cleverly attempts to rectify this deficiency by adding the phrases "and a fueling station" and "and fuel" to three of the Town objectives, as well as a new Applicant objective ("Develop a fueling station and tire facility to serve customers of the retail warehouse"), to now be able to conclude that the no fueling station alternatives (Alts. 2 and 4) "would not meet the following [five] objectives." (Sections 6.4.2.8 and 6.4.4.8.)

While this may provide additional support for the rejection of this alternative, it now renders the inclusion of any alternative that does not include fueling stations into straw men alternatives and, thus, undermines the claim that the RDEIR included a reasonable range of alternatives. Every alternative that eliminates the fueling station can be summarily rejected for failure to meet the same five Project Objectives. By adding these new fueling station focused objectives, the RDEIR must review its prior list of alternatives to ensure the selected ones still represent a "reasonable range of potentially feasible alternatives." (CEQA Guidelines §15126.6(a).) Here, the list of reasonable alternatives should have been revised to include a reduced size fueling station, since the no fueling station alternative and the reduced floor space/no fueling station alternative are no longer "potentially feasible." A reduced fueling station alternative would be potentially feasible because its size would be consistent with: (1) the size of the fueling stations found in the 2011 Costco study (Attachment A to Fehr & Peers letter) which identified sites with no more than 20 fueling stations around the country; and (2) the TIS which relied on five western U.S. Costco sites to support its fueling station trip generation rates and queuing analyses where the largest operation only had 24 fueling pumps (TIS, p. 90).

In addition, the RDEIR's conclusion that the two no fueling station alternatives (Alts. 2 and 4) will not meet the applicant's objective to "Develop a Costco warehouse large enough to accommodate all uses and services that Costco provides to its members elsewhere" (Sections 6.4.2.8 and 6.4.4.8.) is in error, because the phrase is remarkably vague. Nothing in

the RDEIR supports the conclusion that fueling stations are a mandatory element of a Costco. In fact, Costco reports in its 2019 Annual Investor Report filing that it operates 593 fueling stations, even though there were 782 Costco stores operating at the end of 2019.¹ In other words, one-quarter of all Costco stores do not sell gasoline, demonstrating that petroleum is not a service that Costco provides to its members “elsewhere” in every location.

c. The Determination That Alternative 3 Did Not Meet Every Project Objective Is Unsupported by Substantial Evidence.

The RDEIR also considers and then rejects the reduced floor space alternative even though Table 6-13 on pages 6-23 and 6-24 notes that the reduced floor space alternative, which reduces the warehouse structure by 20%, but includes the fueling station as proposed, meets all but 1 of the 16 project objectives. It concludes that this alternative would either not meet or only partially meet the project objective: “Develop a Costco warehouse large enough to accommodate all uses and services that Costco provides to its members elsewhere.” (Section 6.4.3.8.) This analysis is devoid of any discussion of how the alternative fails to attain the basic objectives of the project and in fact, the RDEIR expressly assumes that “[a]ll activities planned for the proposed project would occur under Alternative 3.” Costco’s own website states that the average store is 145k square feet, ranging from 73K to 205K square feet, which undercuts any suggestion that there is a required minimum store size for Costco to be able to “accommodate all uses and services that Costco provides.” (**Exhibit 3.**) It would appear that more likely than not this alternative meets *all* of the project objectives.

VII. The RDEIR Fails To Consider, Let Alone Evaluate Reasonably Foreseeable Impacts On Public Safety That Will Result From The Project.

The City of Rocklin has concerns relative to Public Safety Impacts that have not been acknowledged or addressed in the RDEIR. The RDEIR discusses and mitigates potential disruptions to emergency service response times during project construction through the requirement of a Traffic Control Plan (i.e., discussion of Temporary Construction Impact 3.7-4 on RDEIR page 3.7-34 and proposed Mitigation Measure 3.7-4 on page 3.7-35). Given the Project’s location, however, it is reasonably likely that, the City of Rocklin Police Department will experience additional calls for service or requests to provide mutual response assistance to address items including, but not limited to shoplifting, auto break-ins, vehicle theft, just to name a few, as a result of the ongoing operations of the store. Increased traffic and congestion in the Sierra College Boulevard corridor is also likely to result in similar calls for police, fire, emergency medical and ambulance responses to address the likely increase in traffic accidents, as well as generate the need for enhanced traffic enforcement.

Such concerns need to be addressed in the RDEIR, so that a more informed analysis can be conducted and both the public and decision makers have a better understanding of the full range of impacts to Public Safety and Emergency Services created by the Project, as well as any associated mitigation proposals. These issues are only further exacerbated by the need for the Project to properly mitigate traffic impacts, discussed above, as increased traffic congestion in the area will undoubtedly impact all public safety and emergency response times. The long-term impacts of

¹ <https://investor.costco.com/static-files/05c62fe6-6c09-4e16-8d8b-5e456e5a0f7e>, pp. 3-4, accessed Feb. 6, 2020.

reduced emergency vehicle response due to increased traffic congestion during operation of the Project must be analyzed, let alone mitigated.

VIII. Other Identified Issues Of Concern.

The exhibits to this letter also identify other concerns and suggestions to clarify identified impact analyses, such as Biological Impacts, Greenhouse Gases, Noise, Energy, Transportation, and Cumulative Impacts. We direct you to the exhibits for specific details about these other areas of concern.

IX. Conclusion.

As detailed above, the RDEIR contains significant flaws. The City of Rocklin anticipates that the Town of Loomis in addressing these concerns will be obligated to recirculate the RDEIR for additional public review and comment. In addition to the CEQA considerations, the City of Rocklin is engaged in ongoing consideration of general plan, zoning and project design considerations and will provide those comments by separate transmittal. The City of Rocklin is always committed to work with the Town of Loomis to successfully address the above concerns. Please contact the City Manager's office if you wish to arrange further engagement between the Town of Loomis and the City of Rocklin regarding the Project.

Sincerely,



Daniel S. Cucchi

DSC/wj
Enclosures
cc: Client (w/encls.)