

February 7, 2020

Mr. Daniel Cucchi Abbott & Kindermann, Inc. 2100 21st Street Sacramento, CA 95818

SUBJECT: Comments on Loomis Costco Recirculated Draft EIR

Dear Mr. Cucchi:

I have completed my review of the Loomis Costco Recirculated Draft EIR ("RDEIR") and have identified comments that focus on the comprehensiveness and accuracy of the analysis. Based on the project description provided in the RDEIR, the 17.4 +/- acre project is located on the east side of Sierra College Boulevard and south of Brace Road and consists of an approximately 155,000 square foot Costco Wholesale warehouse building, with 781+/- parking stalls, a 30-dispenser fuel facility, and associated landscaping and street frontage improvements. Other aspects of the project include temporary outdoor sales within the parking field for seasonal sales, a tire center, vehicle display near the building entry for on-line and off-site automobile sales, and signage. The warehouse hours are anticipated to be Monday-Friday, 10:00 a.m. to 8:30 p.m., Saturday from 9:30 a.m. to 6:00 p.m. and Sunday from 10:00 a.m. to 6:00 p.m., and the fuel facility hours are anticipated to be daily from 5:00 a.m. to 10:00 p.m.

While three different site access options are presented in the RDEIR, the proposed project's site plan provides access to the site at three locations, including a proposed new signalized intersection on Sierra College Boulevard, a right-in and right-out only driveway entrance on Brace Road, and a full movement driveway located further east on Brace Road. Costco delivery trucks ranging in size from 26 feet to 70 feet will average about 10 to 13 per typical weekday, with receiving times from 2:00 a.m. to 1:00 p.m., averaging 2 to 3 trucks per hour, with most of the deliveries completed before the 10:00 a.m. opening time. Double-axle fuel trucks for the fueling facility will average five to seven trucks per day during hours of operation. During busy holiday weeks, an additional delivery is often required during the day, with these deliveries occurring any time between 6:00 a.m. and 7:00 p.m.

As an introduction to my comments below and by way of background, I have been employed by the City of Rocklin since 2002, with my primary function up until October 2019 being to ensure CEQA compliance for the City. This includes instances where the City is lead agency and the proponent of projects, as well as situations where the City is reviewing outside agency projects. Prior to my tenure at the City of Rocklin, I worked for the City of Sacramento for twelve years, also in a CEQA compliance position. In those capacities, I have prepared and reviewed environmental documents, managed consultant preparation of environmental documents, and continued my training and education on the preparation of environmental documents. It is with that background, knowledge and understanding that I offer the following comments:

GENERAL COMMENTS:

- 2.3.2.2 Town of Loomis Objectives the second objective states "Locate warehouse retail uses and a fueling station so as not to conflict with the character, scale and architecture of the historic central business district." It is unclear where the boundaries of the "historic central business district" are located as this district is not defined in the Loomis General Plan or Loomis Municipal Code, nor is it depicted on the Loomis General Plan Land Use Diagram or Loomis Zoning Map, though there is a Downtown/Town Center Area designated in the Loomis General Plan (Fig. 3-3).
- 2. 2.3.3.2 Access and Road Improvements the description of the proposed new signalized intersection on Sierra College Boulevard includes one eastbound entry lane and three westbound exit lanes. Providing three exit lanes is an acknowledgement of the high traffic-generating nature of the project, yet providing only one entry lane is counter to that acknowledgement and continues to be a significant concern to the City of Rocklin and the ability for traffic flows on Sierra College Boulevard to operate effectively.
- 3. Section 2.6, Permits and Approvals while within the Loomis Town Council's authority, the need to amend the Loomis Zoning Code in six different locations further demonstrates that the size, scale and type of use that a Costco warehouse represents was never contemplated for by the Town of Loomis.
- 4. Section 2.6, Permits and Approvals there is acknowledgement that an encroachment permit involving public streets in the City of Rocklin would require approval if additional project access is provided to Granite Drive. It is the City's position that project entitlements, not just an encroachment permit, would be needed for project access to Granite Drive.
- Under Existing Conditions, Section 3.7.1.1. Circulation System / Roadway Segments on page 3.7-3 of the RDEIR erroneously describes Brace Road as a "minor street" when in fact it is noted as an Arterial in the Town of Loomis Circulation Element.

6. Inability to Discern Project Details – Poor Legibility of Exhibits – CEQA requires that the RDEIR contain a stable project description and enough clarity for decision makers and the public to understand the proposal as well as potential impacts. The RDEIR was made available in electronic format which is adequate to review text, however, the quality of the exhibits is so poor, even when the reader zooms in that important features such as elevations, top and bottom of retaining walls or their heights, distance measurements, and other critical data components in detailed drawings within the exhibits are not legible. This comment pertains to the grading, utilities and drainage exhibits in particular, but applies more broadly as well.

AESTHETICS:

- 7. Section 3.2.1.2 the discussion of views of the project site acknowledges that viewers of the project site include apartment residents to the north and single family residents to the east, yet the two key viewpoints selected for the aesthetics analysis are viewpoints from the motoring public on Sierra College Boulevard and Brace Road. The selection of those viewpoints ignores the fact that the motoring public experiences views of the project site from those roadways while momentarily driving by and that those who live by the project site who spend considerable more time within their residences and will have to live directly adjacent to the Costco warehouse are not having their viewpoints represented and considered.
- 8. Pages 3.2-9 and 3.2-10, Town of Loomis General Plan a table should be created to show how the proposed project is consistent with the Loomis General Plan, similar to Table 3.2-1 that provides a project comparison to development standards of the Loomis Municipal Code. In particular, the project appears to not be consistent with the following Community Design and Character Policies: 1) The design of development should respect the key natural resources and existing quality development on each site, including ecological systems, vegetative communities, major trees, water courses, land forms, archaeological resources, and historically and architecturally important structures. Proposed project designs should identify and conserve special areas of high ecological sensitivity throughout the Town. Examples of resources to preserve include riparian corridors, wetlands and oak woodlands; 2) Each development project should be designed to be consistent with the unique local context of Loomis – a) Design projects to 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; 4) Design each project at a human scale consistent with surrounding natural and built features – a) Project design should give special attention to scale in all parts of a project, including grading, massing, site design and building detailing; b) Project design should follow the rules of good proportion, where the mass of the building is balanced and the parts relate well to each other; 7) Respect and preserve natural resources within rural areas - a) Design buildings to blend into the landscape; b) Emphasize native vegetation and natural forms in site design and project landscaping; 8) Commercial development shall be subject to design

criteria which visually integrate commercial development into the architectural heritage of the Town. Projects found inconsistent with Loomis's distinct character shall be denied or revised; 9) New lighting (including lighted signage) that is part of residential, commercial, industrial or recreational development shall be oriented away from sensitive areas, and shielded to the extent possible to minimize spillover light and glare. Lighting plans shall be required for all proposed commercial and industrial development prior to issuance of building permits. In addition to those policies noted above, policy numbers 3, 5 and 6 were omitted in the RDEIR discussion but should be included in the requested General Plan consistency comparison.

- 9. Page 3.2-13 notes under Operational Impacts that site development would change the visual character from vacant land containing oak woodland intermixed with annual grassland to a developed condition with a warehouse retail store, parking field and a fueling station, when in fact it the loss of oak woodland intermixed with annual grassland which will occur and should be acknowledged as part of the Construction Impacts.
- Page 3.2-14 notes that most residents east of the project site would not see the proposed building because of the preservation of the existing, mature tree canopy found along the rear property boundary, inclusion of a masonry privacy wall along the perimeter of the site and incorporation of a landscape setback. This statement fails to acknowledge the following facts:

 that much of the existing tree canopy consists of deciduous trees, it is not a continuous canopy, and the Biological Resources chapter of the RDEIR notes that only three valley oak trees would be preserved along the perimeter of the site near the residences to the east, and
 the additional trees planted as part of the landscape plan for buffer purposes will take many years to reach a level of maturity that provides any screening benefit. There is reference to Figure 3.2-16 and cross section E, but Figure 3.2-16 does not include a cross section detail. Cross-sections should have been developed to demonstrate whether or not a 33 foot tall building and 28-32 foot tall parking lot light standards will be visible from the adjacent residences.
- 11. Page 3.2-14 the project's visual impact along Sierra College Boulevard is downplayed because of anticipated project landscaping but most of the tree species proposed as part of the project's landscaping are deciduous and will be of such a size when initially planted that they will have limited screening ability. It is also likely that underground utilities would be located along the project's Sierra College Boulevard frontage and the placement of those utilities would create limitations on the size and type of landscaping that could be planted over the utilities and within the utility easement. These facts are not addressed in the impact analysis.

- 12. Table 3.2-1, Compliance with Town Development Standards
 - a) Outdoor Lighting, item C states "No lighting on private property shall produce an illumination level greater than one footcandle on any property within a residential zoning district except on the site of the light source." – while the consistency discussion speaks to shielding and cutoff lenses, a photometric study should be conducted as that is the only way to demonstrate compliance or not with the standard's metric of one footcandle.
 - b) Screening Between Different Land Uses the discussion of what is required notes that "proposed walls and fences shall be designed to incorporate decorative features on both sides, as approved by the director, to avoid the appearance of long, unbroken flat planes without visual interest." The consistency discussion refers back to the discussion under item A.(1.), but that discussion is silent on decorative elements and renderings and discussions of the various walls and fences in the RDEIR do not identify any design elements as required by the above language.
 - c) Chapter 13.38 Signs Figure 3.2-11 depicts the entry signage that appears to be suspended from an awning feature and above the parapet of the main building, not at least one foot below the parapet as identified in the standard, and the consistency discussion says no awning signs are planned.

AIR QUALITY

- 13. Impact 3.3-1, Generation of Temporary, Short-Term, Construction-Related Emissions of Criteria Pollutants and Precursors, Table 3.3-4 the table shows the maximum daily emissions of NOx from construction phases for all phases to be less than the PCAPCD's threshold of 82 lb/day, and specifically notes that rough grading would generate 76.1 lb/day and base for paving would generate 29.8 lb/day. There is a potential that these two construction phases could overlap, thus resulting in an exceedance of the PCAPCD NOx threshold and a significant impact. A more appropriate approach would have been to assume some level of overlap of those two phases which likely would have exceeded the PCAPCD NOx threshold and required mitigation.
- 14. Impact 3.3-2, Generation of Local Mobile-Sourced Carbon Monoxide Emissions, Table 3.3-5 the table shows 36.76 lb/day of NOx emissions from mobile sources, yet the same table from the previous 2018 Draft EIR shows 181.51 lb/day and an exceedance of the PCAPCD threshold was acknowledged, resulting in the identification of mitigation measures. Given the project has not substantially changed between the 2018 Draft EIR and the current RDEIR other than the project being analyzed in the RDEIR now includes more gas pumps which should lead to

greater operational emissions, it is not evident how there could be such a large discrepancy in the modeled mobile emissions. Page 3.3-19 notes that the Town of Loomis General Plan contains an air quality policy which includes a recommended threshold for determining the need for further analysis of potential impacts from CO emissions related to mobile-source operations. The discussion then concludes that because of the decline in CO emissions since the 2001 General Plan policy and because the PCAPCD has since come up with more current screening-level procedures, CO concentrations will be assessed to meet the intent of the General Plan policy but using the PCAPCD thresholds. This approach creates a General Plan consistency issue by not following current General Plan policy.

- 15. Impact 3.3-3, Generation of Local Mobile-Source Carbon Monoxide Emissions The previous 2018 Draft EIR shows maximum daily CO emissions from mobile sources would be approximately 336 lb/day and the current RDEIR shows a level of 67.69 lb/day. Given the project has not substantially changed between the 2018 Draft EIR and the current RDEIR other than the project being analyzed in the RDEIR now includes more gas pumps which should lead to greater operational emissions, it is not evident how there could be such a large discrepancy in the modeled mobile emissions.
- 16. The previous 2018 Draft EIR identified significant impacts and accompanying mitigation measures under Impacts 3.3-1 (Generation of Temporary, Short-Term, Construction-Related Emissions of Criteria Pollutants and Precursors), 3.3-4 (Exposure to Sensitive Receptors to Toxic Air Contaminant Emissions) and 3.3-5 (Exposure of Sensitive Receptors to Objectionable Odors), and the current RDEIR identifies those same impacts as all being less than significant and no mitigation measures required. Given the project has not substantially changed between the 2018 Draft EIR and the current RDEIR other than the project being analyzed in the RDEIR now includes more gas pumps which should lead to greater operational and Toxic Air Contaminant emissions, it is not evident how there could be such a large discrepancy in the identification of significant impacts and necessary mitigation measures.

BIOLOGY

17. Impact 3.4-2, Loss of Protected Oak Trees within the Town of Loomis (Project Site, Option 1A) – Given that oak trees can grow to heights 50-100+ feet tall and have canopies 60-100+ feet wide, depending upon the species, according to horticultural/arborist resources oak trees should be planted 10-40 feet away from all other trees. Given those parameters and likely planting restrictions above or within utility easements, it is questionable whether the project site supports enough room to accommodate the planting of 100 15-gallon container trees of appropriate oak species based upon the necessary spacing required for mature oak trees. It is also questionable whether a large asphalt parking area with small planting areas and it's "heat island" effect is an environment conducive to oaks living prosperously.

- 18. Mitigation Measure Bio-1 the mitigation measure should specify that before grading permits are issued, the project applicant shall provide evidence to the Town of Loomis that the conservation easement has been recorded, and (not "or" as currently written) shall provide financial assurances to guarantee that adequate funding is available to implement the oak woodland open space mitigation plan described above.
- 19. Mitigation Measure Bio-3 similar to Mitigation Measure Bio-2, this mitigation measure also needs to include a monitoring component if active nests are found and buffers are implemented.

GREENHOUSE GAS EMISSIONS/ENERGY

- 20. Section 3.5.2.3, Regional and Local Plans, Policies, Regulations and Ordinances this section references the SACOG MTP/SCS Plan adopted in 2016, but fails to recognize the 2020 MTP/SCS that was adopted by the SACOG Board on November 18, 2019.
- 21. Impact 3.5-1, Generation of Greenhouse Gas Emissions The previous 2018 Draft EIR shows total annual operational GHG emissions as 17,232 MT CO2e/year and the current RDEIR shows a level of 6,159 MT CO2e/year. Given the project has not substantially changed between the 2018 Draft EIR and the current RDEIR other than the project being analyzed in the RDEIR now includes more gas pumps which should lead to greater operational emissions, it is not evident how there could be such a large discrepancy in the modeled greenhouse gas emissions.
- 22. Impact 3.5-2, Conflict with an Applicable Plan, Policy or Regulation Adopted for the Purpose of Reducing the Emissions of GHGs the discussion identifies Policy 3 of SACOG's 2016 MTP/SCS which establishes that "SACOG encourages local jurisdictions in developing community activity centers well-suited for high-quality transit service and complete streets," and then goes on to note bus service routes and stops in the project area that are provided by Placer County Transit. In support of this Policy and in support of the TDM measures identified in Mitigation Measures GHG-1, the Town of Loomis should work with Placer County Transit to establish a bus stop location at the Costco site and assist Placer County Transit with funding in support of existing and additional transit services.

NOISE

- 23. It is difficult to understand why the noise from the Union Pacific Railroad, which is less than 1,000 feet away from the project site, and whose locomotives sound their horns at the railroad track crossing of Sierra College Boulevard just north of Taylor Road, is not discussed or apparently not accounted for in the analysis.
- 24. Table 3.6-7, Worst-Case Construction Equipment Noise Levels at the Nearest Uses in the Project Vicinity the discussion following the table notes that an exterior-to-interior noise

level reduction of at least 25 dB can be achieved for wooden structures with doors and windows closed. This metric applies to modern construction which would be applicable for the relatively new residential subdivision located to the east of the project site, but would not be applicable for the much older apartments located to the north of the project site. Receiver LT-1, which is located in the northern portion of the project site, is noted in Table 3.6-7 as having a Worst-Case Outdoor Construction Noise Level of 89 dBA Leq, and then a Doors and Windows Closed noise level of 64 dBA Leq. This represents a reduction of 35 dB, more than the 25 dB that is noted as being able to be assumed.

- 25. Impact 3.6-4, Exposure of Existing Noise-Sensitive Receivers to a Substantial or Periodic Increase in Ambient Noise Levels in the Project Vicinity Above Levels Existing Without the Project from Operation of Stationary Sources the impact discussion makes the assumption that parking lot sweepers will be restricted to daytime hours to be consistent with the Town's Noise Policy 17, which limits the use of parking lot sweepers if their activity will result in noise which adversely affects residential areas. The nature of parking lot sweepers is that they perform best when a parking lot is empty, which means after a store's operating hours. It is difficult to accept that parking lot sweepers for the Costco project will only operate during daytime hours and such an assumption should be memorialized as a mitigation measure to ensure parking lot sweepers will in fact only operate during daytime hours (*Lotus v. Department of Transportation (2014) 223 Cal. App 4th 645*).
- 26. Impact 3.6-4, Exposure of Existing Noise-Sensitive Receivers to a Substantial or Periodic Increase in Ambient Noise Levels in the Project Vicinity Above Levels Existing Without the Project from Operation of Stationary Sources the impact discussion makes the statement "In order to limit the impact of heavy truck trips to level of service at study intersections, Costco plans to conduct warehouse deliveries during the nighttime hours, with up to three trucks per hour. While it is correct to note that deliveries will occur during the nighttime hours, they will also occur during daytime hours as the Project Description notes that "Warehouse shipments would be received between 2 a.m. and 9 p.m., averaging two to three trucks per hour, with most deliveries completed by 10 a.m." Similar to above, the restrictions regarding warehouse delivers should be memorialized as a mitigation measure to ensure the noted delivery hours (*Lotus v. Department of Transportation (2014) 223 Cal. App 4th 645*).

TRANSPORTATION

27. Table 3.7-8, Trip Generation by Proposed Loomis Costco Wholesale Warehouse with Fueling Station – as noted by the Fehr & Peers analysis, reducing the overall project trip generation of 12,290 weekday daily trips by assuming 4,090 pass-by trips and 3,870 diverted trips, resulting in 4,330 weekday daily trips significantly underestimates the project's trip generation. These reductions are much higher than industry standards, are not supported by any documentation and render the entire traffic analysis as flawed.

- 28. Impact 3.7-1, Degradation of Level of Service at Intersections in the Study Area the analysis shows that under the existing plus project condition only three intersections would be impacted: Sierra College/SR 193, Taylor Road/Penryn Road, and Taylor Road/Webb Street. With the exception of Taylor Road and Webb Street, it is difficult to accept the analysis as being accurate when no other intersections near the project site are identified as being impacted, yet the project could have significant impacts at Sierra College/SR 193 and Taylor Road/Penryn Road, intersections that are many miles away from the project site.
- 29. Impact 3.7-3, Potential for Creation of Substantial Traffic-Related Hazards the mitigation measure discussion recognizes that the affected intersections of Sierra College Boulevard/Granite Drive, Sierra College Boulevard/I-80 WB Ramps and Granite Drive/Rocklin Road and Sierra College Boulevard/I-80 WB ramps are within the jurisdiction of the City of Rocklin and Caltrans and cannot be mitigated by the Town of Loomis. However, the mitigation measure should require that the Town of Loomis make a good faith to negotiate with the City of Rocklin and Caltrans to fund and implement the identified re-striping and signal optimization. Furthermore, mitigation measures to address potential queuing impacts should include signal coordination along the Sierra College Boulevard corridor
- 30. Mitigation Measure 3.7-4, Prepare and Implement a Construction Traffic Control Plan given the project's location adjacent to the City of Rocklin and its roadways and intersections, the preparation and implementation of a construction traffic control plan must be coordinated with the City of Rocklin.
- 31. Tables 4-10 on page 4-18 and 4-19 on page 4-30 include as a mitigation measure a second left hand northbound turn lane at the I-80 WB off-ramp. The RDEIR discloses environmental benefits from that mitigation measure but to that end, the secondary impacts of intersection reconstruction has not been evaluated in the RDEIR and is required to be disclosed. (CEQA Guidelines §15126.4(a)(1)(D).)
- 32. The RDEIR discloses significant unmitigated impacts in various locations as noted in the previous section of this letter. This conclusion does not extinguish the Town of Loomis's obligation to adopt all feasible mitigation. Feasible mitigation would require all delivery truck traffic to and from Costco to use the Horseshoe Bar interchange. While this would not reduce impacts to a less than significant level, it is a feasible mechanism to reduce congestion at Project impacted intersections.
- 33. Impact 3.7-4, Project-Related Interference with Emergency Access the impact analysis discusses fueling station queuing and the use of observational data from other Costco fueling facilities, each with 22 or fewer fueling dispensers. The analysis should have been based on 30 fueling stations and this flaw underestimates the project's queuing potential.

ENERGY

34. Consumption of Energy, Table 3.8-2 presents construction fuel consumption in both total amounts and amortized over a 20-year period. Given that the consumption of fuel during construction is a singular event, it is not clear why the analysis has chosen to present an amortized rate of construction fuel consumption other than perhaps to dilute a true representation. The impact analysis continues with the reasoning that a reduction in construction fuel consumption and increased energy efficiency would occur as a result of a Project Description element calling for the use of new and renewable building materials extracted and manufactured in the region, and purchase materials locally for the masonry concrete requirements. Rather than rely on these elements in the project description, there should be a requirement that the bidding process for the project, including the request for proposals and award of bid process, as well as the construction documents themselves include the project description language as it currently exists.

CUMULATIVE

- 35. Impact 4.3-2, Result in a Cumulatively Considerable Net Increase in a Criteria Pollutant for which the Region is Nonattainment under an Applicable Federal or State Ambient Air Quality Standard the impact discussion contains the same shortcomings regarding construction phase overlaps and differences in modeled emissions between the prior 2018 Draft EIR and the new RDEIR as noted above in comments on Impacts 3.3-1, 3.3-2 and 3.3-3.
- 36. Impact 4.3-6, Cumulative Greenhouse Gas Impacts the impact discussion contains the same shortcomings regarding differences in modeled emissions as noted above in comments on Impact 3.5-1.
- 37. Mitigation Measures for Cumulative Transportation Impacts – the mitigation measure discussion recognizes that some of the affected intersections are within the jurisdiction of the City of Rocklin, Placer County and Caltrans and cannot be mitigated by the Town of Loomis. However, the mitigation measures should require that the Town of Loomis make a good faith to negotiate with the City of Rocklin, Placer County and Signal optimization.
- 38. Table 4-19 "Cumulative Long Term Plus Project Mitigation Measures" on pages 4-30 and 4-31 lists recommended mitigation for intersections 8, 9, 12 and 17 in Rocklin, however, only intersections 8 and 12 are listed in Table 4-20 - "Cumulative Long Term – Intersection LOS Analysis, Mitigation Results. With this omission, the document does not clearly disclose the effectiveness of the mitigation at intersections 9 and 17.
- 39. 5.1.1 Population Growth the discussion notes that the project is not likely to generate indirect growth by encouraging individuals outside of Loomis to migrate in search of

employment opportunities and then contradictorily discusses the available labor force for the entirety of Placer County as being 4,900, enough to meet the demands for full-time positions to operate the project without in-migration of people from outside of the region. Given the low population of Loomis and in turn the available labor force within the Town limits, it is highly likely that individuals outside of Loomis will seek employment at the new Costco warehouse store and choose to relocate closer to their new employment.

40. Sections 5.3.2.6.1 and 5.3.2.6.2 – Fire and Police Protection Services - It is difficult to quantify the project's impacts to Rocklin Fire and the City's Emergency Response System. One concern that does not appear to have been addressed is the impact of additional traffic on Sierra College Boulevard and other nearby roadways and how that affects Rocklin Fire's response model. As congestion increases, it has a direct impact on Fire and medical emergency service response times. In addition, prospective issues with this development that could potentially affect law enforcement within the City of Rocklin stem from the traffic generated by the development and the associated congestion. More vehicle trips on City streets brings the possibility of more accidents and/or demands for other law enforcement related traffic enforcement. In addition, this extra traffic could impact our response times and road quality causing our roads to fail faster than originally anticipated. These issues do not appear to have been currently addressed in the RDEIR.

ALTERNATIVES

41. 6.3.1, Opportunity Site 1 – Site suitability/consistency with the Town of Loomis General Plan – it is noted that Opportunity Site 1 would not be consistent with Goal 3 of the General Plan's Community Design Element that are directed towards designing projects that fit their context in terms of building form, siting and massing, and that a Costco warehouse store has a much greater building height and mass than the one- and two-story wood structures that characterize the existing development in the historical downtown commercial district. The same inconsistency issue occurs with the proposed location of the Costco warehouse store given the one- and two-story structures that characterize the existing development located in Loomis in the project vicinity.

Sincerely,

S. O. Morus

David Mohlenbrok Community Development Director City of Rocklin