

July 7, 2020

Via E-mail

Town of Loomis  
c/o Costco Comments  
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Re: Costco Final EIR (June 2020)(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). In light of the Town of Loomis’ release of the Final EIR (“FEIR”) in just a few days prior to an extended holiday weekend, this letter is focused on the most readily identifiable issues and concerns that remain unaddressed. The City of Rocklin reserves the right to continue its review and submit additional comments, if any, in the days following the Planning Commission hearing on the Project.

Attached are additional comments prepared by Fehr & Peers regarding fundamental flaws in the traffic analyses and newly released Vehicle Miles Traveled (“VMT”) study. (**Exhibit 1.**) As discussed below and detailed further in the exhibit, the Final EIR (“FEIR”) has not fully addressed errors in the identification, evaluation, and mitigation of impacts, particularly on trip generation assumptions and the calculation of the Project’s VMT. As a consequence, these analytical errors continue to undermine the accuracy of the analysis of other critical environmental issues such as Air Quality, Greenhouse Gases (“GHG”), and Noise. The City of Rocklin has also identified several other unresolved CEQA errors in the alternatives, noise, and responses to comments, as well as general plan and zoning issues that must be addressed before the Town of Loomis considers final approval of the Project. The City of Rocklin requests that the EIR and the Project be modified to address the issues identified in this letter, which includes the exhibit which is incorporated into this comment letter in full.

**I. Significant Traffic And VMT Analytical Errors Deprive The Public Of A Meaningful Opportunity To Comment On The Significant Impacts of The Project.**

Despite the numerous errors and inaccuracies in the RDEIR’s traffic and VMT analyses thoroughly explained in the City of Rocklin’s Comment Letter, the FEIR’s responses to comments relies on irrelevant comparisons, unsupported assumptions, or simply avoids addressing issues

altogether, in order to claim “all is well.” The following are just the more glaring issues the City of Rocklin has identified in its review of the FEIR.

*a. The Newly Prepared VMT Study Fails To Fix The Problems Created By The Old VMT Analysis.*

To address comments by the City of Rocklin and others regarding the inadequacies of the assumptions and analyses of VMT in the RDEIR, the FEIR introduces a whole new VMT study that purports to affirm the conclusions in the original VMT analysis. Tellingly, it does not confront the questions surrounding the reasonableness of the pass-by assumptions. Instead, the FEIR’s response asks the public to ignore the problems in the original VMT analysis by pointing to another shiny new VMT study that suffers from its own, similar issues:

- The new VMT study makes several assumptions that are based on unsupported assumptions provided by the applicant without any underlying data that would allow decision makers and the public to independently evaluate the reasonableness of those assumptions. These include: (1) the purported “average” number of transactions at the Roseville store; (2) the assumed daily trip generation rate of the Loomis store that is 21% lower per KSF than the Roseville store; and (3) the assumed change in member visit frequency.
- On the substance of the trip generation assumption, the VMT study fails to account for a substantial difference in the number of trips per KSF in Loomis over what is assumed for Roseville. Presumably the relatively close proximity of the Loomis store, which would be bigger in size and have fewer daily customers, would eventually find an equilibrium with the Roseville store. The new VMT study simply presumes, without evidence, that full Loomis project operations will generate 21% fewer daily trips.
- The Town insists that its Costco specific data is accurate simply because it identifies lower pass-by and diverted trip estimates than would be identified in the Trip Generation Manual. (Response to Comment 58.) The Trip Generation Manual information is immaterial, because it is not evidence that the Costco-provided data (which data and analysis has not been provided to decision makers or the public to independently evaluate the reasonableness of the RDEIR’s assumptions) is reasonable and sufficiently supported by substantial evidence.
- The new VMT study still does not confront the pass-by trip assumption problems identified in City of Rocklin Comment 59. In fact, assumptions in the new VMT study only exacerbate the issues previously identified. As outlined in Figure 1 to Exhibit 1, pass-by trips include only those vehicle that “pass by” the studied destination and decide to pull into the site even though they had no intention to drive to that location prior to

driving by. Any other scenario would be considered a primary trip, or at least a diverted trip, both of which would account for some additional amount of VMT.

As shown in City of Rocklin's Comment 59, the top 20 zip codes projected to serve the Loomis store would consist of 45,208 members, which accounts for approximately 19% of all adults within that same geographic region. Figure 1 reasonably assumes that on any given day the same 19% share of 2,060 existing PM peak hour motorists would be traveling by the Project site, equaling 391 Costco members. If, as the RDEIR assumes, 179 of those pass-by trips decide to enter the site, then the pass-by assumptions in the RDEIR requires nearly 50% of those Costco members passing by the site to enter the site. Given that the typical upper bound of the percentage of pass-by drivers that enter a studied site used by traffic engineers is 25%, the burden is on the Town to provide substantial evidence in support of the reasonableness of its pass-by rate assumption of 33.3%. As has been identified previously, and again here, the Town has not provided any evidence to support its unorthodox pass-by rate assumptions.

*b. The FEIR Does Not Adequately Respond To Comments Demonstrating Critical Errors in the RDEIR's Cumulative Buildout Assumptions.*

City of Rocklin Comment 69 identified a critical error in the buildout trip generation assumptions for the Undeveloped Commercially-Zoned Property directly across from the entrance to the Project site, as well as the Granite Marketplace project. The City of Rocklin's 2030 Travel Demand Model expects the property directly west of the Project 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. Instead, the RDEIR only assumed 296 weekday PM peak hour vehicle trips would use the presumed west leg of the Project Driveway intersection. For Granite Marketplace, the site is projected to yield 153,000 square feet of retail and a net increase of approximately 575 weekday PM peak hour trips directly onto the east leg of the Sierra College Boulevard/Granite Drive intersection. When these errors were identified, the Town's Response to Comment 69 deflected all responsibility to what amounts to "we included whatever the City of Rocklin 2030 model said," and in the case of Granite Marketplace, the response stated the model included 414 weekday PM peak hour trips were generated in the 2030 model. Yet, despite this assertion the net increase in weekday PM peak hour trips for the eastern leg of the Sierra College Boulevard/Granite Drive intersection between existing and cumulative conditions is only 100 vehicles. Response to Comment 69 fails to address this inconsistency.

- c. The FEIR Fails to Adequately Explain Why Brace Road Trip-Share Assumptions Were Not Modified In Response to Gridlock Conditions On Southbound Sierra College Boulevard.*

City of Rocklin Comment 65 explains that Brace Road trip share assumptions should have been modified to account for more Brace Road trips to access Horseshoe Bar Road Interchange, as a result of significant time-delays to travel south on Sierra College Boulevard to reach I-80 under existing plus project conditions. The Response to Comment simply argues that this will not occur because it would be considered “substantial out-of-direction travel.” The response fails to address the foundational premise of the comment that technological improvements, such as wayfinding smart phone apps, easily allow drivers to determine alternative routes that can reach their destination faster even when, technically, the faster route is a longer one. Furthermore, the response raises an entirely irrelevant assertion that the trip-share assumption was “approved” by the City of Rocklin. The Town has an independent obligation to re-evaluate its early assumptions during the internal traffic study preparation process when data indicates that a previously reasonable assumption is no longer reasonable due to changed circumstances.

- d. The FEIR Appears To Confirm An Additional Unidentified I-80 West Bound Off-Ramp Impact.*

Response to Comment 89 appears to have confirmed an additional unidentified queuing impact on the I-80 west bound off-ramp which was previously identified in City of Rocklin Comment 87 as the result of its traffic analysis peer review. (See Exhibit 1, Rebuttal 89.) The Town must address this unidentified potentially significant impact.

## **II. The Revised Mitigation Measure To Address Operational Noise Impacts Improperly Defers Formulation of Mitigation Without Establishing Performance Criteria.**

The FEIR proposes changes to Mitigation Measure Noise-2 that includes a noise reduction component that requires the following: “The Tire Center doors shall be closed whenever pneumatic wrenches and tire breakers are used, to the maximum extent feasible.” As a result, the FEIR modifies the previously identified significant and unavoidable noise impact conclusion to now find that the noise impact would be less than significant with mitigation. The inclusion of a mitigation requirement that requires compliance only “when feasible” improperly defers formulation of the mitigation, as there is no performance criteria identifying how the Town will ensure compliance, nor demonstrate that the requirement will actually lead to the impact reduction that is presumed to occur.

## **III. The FEIR’s Responses To Concerns Raised About The Adequacy Of The RDEIR’s Alternatives Analysis Fail To Cure Those Flaws.**

- a. The FEIR’s Response To Concerns That The Narrowing Of The Project Objectives Rendered Some Alternatives Facially Infeasible Do Not Address The Fact That Two Alternatives Fail To Meet More Than Half Of The Town’s Project Objectives.*

The City of Rocklin’s concerns about the RDEIR’s narrowing of the project objectives is that they undermine the potential feasibility of the selected alternatives, thus precluding the consideration of other alternatives that could reduce potentially significant

impacts of the Project. As noted in Response to Comment 49, a range of alternatives need only feasibly attain “most” of the project objectives, but two of the three alternatives (that are not a “no project” alternative) on their face would fail to meet three of the Town’s five objectives. As a result, the response concludes that there is no need to consider a Reduced Project/Reduced Fueling Station alternative because “the RDEIR analyzed four alternatives.” The proposed alternative should be analyzed because it would (i) meet “most” of the project objectives and (ii) reduce significant traffic impacts as evidenced by the outsized trip generation impact of the fueling station component as assumed in the RDEIR’s analysis of Alternative 2. (See RDEIR section 6.4.2.6 [“3,300 fewer daily trips would be generated under Alternative 2 (No Fueling Station).”].).

*b. Response to Comment 52 Relies On Unsupported Suppositions Provided By The Applicant To Conclude Alternative 3 Does Not Meet Every Project Objective.*

The City of Rocklin commented that the RDEIR’s finding that Alternative 3 did not meet the project objective “Develop a Costco warehouse large enough to accommodate all uses and services that Costco provides to its members elsewhere,” was unsupported by substantial evidence. The City argued this was so, because the RDEIR expressly assumed that “all activities planned for the proposed project would occur under Alternative 3.” Instead of addressing this issue, the Towns’ response was non-responsive. It laid out an eloquent defense of a project objective that does not actually appear in the RDEIR. The objective at issue only calls for a project that could “accommodate all uses and services,” not that it must also accommodate them at a specific level. The fact that the 20% reduction would purportedly “result in a reduction of 500 to 550 SKUs” (which is asserted by the applicant without evidence that would allow the decision makers and the public to independently evaluate the veracity of the applicant’s conclusions) does not actually support the Town’s assertion that Alternative 3 would fail to “accommodate all uses and services.” The RDEIR expressly assumes that “all activities planned for the proposed project would occur,” and the fact that a reduced store size could reduce the volume of SKUs does not support the conclusion that the store could not still “accommodate all uses and services” at an overall reduced volume.

**IV. Responses To Comments Fail To Adequately Respond As Required By CEQA.**

So far, the City of Rocklin has identified several occasions where the FEIR’s responses to comments simply ignore issues and concerns posed in the original comment.

*a. Response To Comment 22.*

The response fails to address queue spillback concerns raised about the Sierra College Boulevard/Granite Drive intersection and the Sierra College Boulevard/Brace Road intersection.

*b. Responses To Comments 23 and 90.*

The response fails to address the substantial evidence provided by the City of Rocklin showing specific examples of project driveways aligning directly with the entrance to Costco facilities and other similar uses in other locations.

*c. Response To Comment 115.*

The response does not address the City of Rocklin's comment that the proposed wall does not "incorporate decorative features on both sides..." as required by the Town Development Standards.

*d. Response To Comment 137.*

The response asserts that the City of Rocklin comment "does not identify any specific secondary effects or provide any evidence thereof." Though CEQA lead agencies have their own independent obligation to evaluate the potentially significant secondary effects of proposed mitigation, the City of Rocklin is happy to assist. Presumably the second northbound left turn lane would require widening of Sierra College Boulevard to accommodate the added turn lane, which could have biological impacts associated with the additional land area that is required. The additional westbound right turn lane could also have biological impacts because of the land area that would be required, and the City of Rocklin is aware of the presence of wetlands in that location due to a prior proposal to develop that area. Unanticipated discoveries of cultural resources could also occur anytime you are disturbing land, particularly for the undisturbed area of land for the additional westbound right turn lane.

*e. Response To Comment 138.*

The response to the comment that suggested the Town consider requiring delivery trucks to use Horseshoe Bar interchange, improperly assume that the only route that could be considered was from Horseshoe Bar interchange via Brace Road. The response failed to consider another potentially viable alternative truck route from Horseshoe Bar interchange via Taylor Road. This route avoids truck traffic through residential neighborhoods, aligns the trucks' entry into the site with the right-in only entrance on Brace Road, and the distance to the same location on I-80 northeast of the Horseshoe Bar interchange appears to be about 1/3 mile shorter than the Sierra College Boulevard interchange route.

*f. Response To Comment 140.*

The response fails to address the concerns over the RDEIR's energy impacts analysis use of amortized construction fuel amounts given the short-term nature of the Project's construction vehicles' consumption of fuel.

**V. The Project Is Not In Compliance With Applicable Mandatory Loomis General Plan Policies.**

- a. The Town Seeks to Improperly Defer Its Compliance Determination Of The Project's Mandatory Obligation To Conduct Carbon Monoxide Modeling Required By The Loomis General Plan To Another Agency.*

The Town's Response to Comment 34 attempts to address the City of Rocklin's comment that the Project failed to prepare a carbon monoxide (CO) modeling analysis that is mandated by the Town's own general plan Natural Resources and Open Space Policy 1.e by relying on the Air District's determination over whether CO modeling is necessary. The Town cannot defer its general plan compliance determination obligation to another agency. The Town adopted this mandatory policy and must comply.

- b. The Town Seeks to Improperly Amend Land Use Policy F.5 Without Processing A General Plan Amendment.*

The Town's mandatory General Plan Land Use Policy F.5 states that "New commercial development shall preserve and integrate existing natural features (e.g., creeks, native trees, rock outcrops) and topography into project landscaping." The Town's consistency analysis seeks to add a "where feasible" flexibility component to a policy where there is no such language. The Town must comply with its own mandatory policy to "preserve and integrate" native oak stands on the Project site.

- c. The Town's Consistency Determination With Loomis General Plan Natural Resources and Open Space Policy 1.j Requiring Park-and-Ride Lots On New Developments Is Not Supported By Substantial Evidence.*

The Town's determination that the Project is consistent with Natural Resources and Open Space Policy 1.j requiring new development to dedicate land for park-and-ride lots is not supported by substantial evidence. In fact, the Town's assertion that the Project involves a proposed commercial development (retail shopping) and is not an appropriate location for use as a park-and-ride lot" is directly contradicted by (1) the Caltrans park and ride lot within the nearby Rocklin Commons shopping center; and (2) the Yuba-Sutter Transit park-and-ride lot located at the Sam's Club on Highway 20 in Yuba City.

- d. The Town Always Has The Right To Modify Or Delete A Problematic General Plan Policy, But Has Chosen Not To Do So.*

If the Town has now decided that these policies are no longer needed then it could amend its own general plan and prepare the CEQA analyses necessary to do so. None of this occurred, which leaves the Town with one option—comply with its own mandatory policies.

**VI. The Project Is Inconsistent With The Allowed Uses In the Site's Residentially-Zoned Properties.**

As raised by several commenters to the RDEIR, the City of Rocklin concurs that the Project, as proposed, is not consistent with the allowed uses in the residential zoning districts applicable to

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the Project site. The City should either modify the Project to remove the Project uses from the residentially zoned property or rezone the affected properties to general commercial, consistent with the remainder of the Project site.

## **VII. Conclusion.**

As detailed above, the FEIR does not fully account for the significant flaws previously identified in the RDEIR, and sometimes exacerbates these flaws with additional unsupported assumptions asserted by the applicant without providing the necessary data and evidence for decisionmakers and the public to independently evaluate the reasonableness of those assumptions. 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 has identified general plan, zoning and project design errors that will need to be addressed prior to consideration of Project approval. 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/lh  
Enclosures  
cc: Client (w/encls.)





July 7, 2020

Mr. Daniel Cucchi, Legal Counsel  
 City of Rocklin  
 3970 Rocklin Road  
 Rocklin, CA 95677

**Subj: Review of Responses to Transportation-Related Comments in the Loomis Costco Recirculated FEIR**

Dear Mr. Cucchi:

This letter presents our rebuttal to many of the responses contained in the *Loomis Costco FEIR (AECOM, June 2020)* (“FEIR”) to our comment letter dated February 2, 2020 on the DEIR. We continue to have many concerns regarding the transportation analysis and conclusions contained in the RDEIR/FEIR.

*Appendix B (Supplemental Trip-Based VMT Sensitivity Analysis)* to the FEIR contains new information that we believe is important to understanding the transportation analysis and its shortcomings. **Table 1** summarizes key data from *Appendix B* pertaining to the expected travel characteristics of the existing Roseville Costco Store (located on Stanford Ranch Road) and the proposed Loomis Costco Store.

Table 1: Roseville and Loomis Costco Store Trip Generation and VMT Estimates							
Store Location	Status	Source	Store Size	Trip Generation		Vehicle Miles of Travel (VMT)	
				Weekday Trips <sup>1</sup>	Daily Trip Rate	Total <sup>1</sup>	VMT Rate
Roseville, CA	Existing (2019)	Table 1 of Appendix B	136.95 KSF	16,728	122 trips per KSF	121,563	888 miles per KSF
Loomis, CA	Proposed	Table 2 of Appendix B	155 KSF	12,290	79 trips per KSF	92,046	594 miles per KSF
Roseville, CA	Existing (w/ Opening of Loomis Store)	Table 4 of Appendix B	136.95 KSF	13,659	100 trips per KSF	40,961	299 miles per KSF

Notes:  
<sup>1</sup> Includes all trip types (i.e., pass-by, diverted, new, customers, employees, and deliveries).  
 KSF = Thousand Square Feet.

**Table 2** then uses the data from Table 1 and each store’s size to calculate aggregate two-store travel characteristics.



Scenario	Total Store Size(s)	Total Trip Generation		Vehicle Miles of Travel (VMT)	
		Weekday Trips <sup>1</sup>	Daily Trip Rate	Total <sup>1</sup>	VMT Rate
One Store Model (Roseville only)	136.95 KSF	16,728	122 trips per KSF	121,563	888 miles per KSF
Two Store Model (Roseville and Loomis)	291.95 KSF	25,949	89 trips per KSF	133,007	456 miles per KSF

Notes:  
<sup>1</sup> Includes all trip types (i.e., pass-by, diverted, new, customers, employees, and deliveries).  
 Source: *Appendix B (Supplemental Trip-Based VMT Sensitivity Analysis)* contained in FEIR.

These tables are referenced in various rebuttals provided below to the FEIR responses to our comments from our comment letter dated February 7, 2020.

**Table 3** on the following pages contains a synopsis of many of our comments (from our February 7, 2020 letter), an overview of the response contained in the FEIR, and our rebuttal to that response. In summary, we remain concerned that most of our comments were not fully addressed and that technical deficiencies in the transportation EIR analysis remain.

Respectfully,

FEHR & PEERS

John Gard, P.E.  
 Principal



**Table 3: Rebuttal to Responses to Fehr & Peers' Comment Letter Dated February 7, 2020**

Comment #	Overview of Comment	Response	Rebuttal
58	Number of new peak hour trips generated by project was underestimated	The "tailored Loomis Costco trip generation data" results in higher trip estimates than if Institute of Transportation Engineers (ITE) rates were used.	The response ignores the stated concern in the comment that the tailored approach did not properly take into consideration how many fueling pumps would be built on-site (and that the number of fueling pumps is positively correlated with more trips). Instead, it simply states that the trips used in the study are greater than a national source. The fact that more fueling pumps equates to more trips is well-known in the transportation industry and relying on this type of response appears as a tacit admission that the tailored trip generation approach was flawed.
59	Pass-by percentages assumed for the project were too high	Pass-by percentages were based on studies of other Costco stores and were greater than ITE published rates.	We reiterate our comment that the assumed amount of pass-by travel to the site coming from Sierra College Boulevard was too high. <b>Figure 1</b> provides an illustration of why pass-by percentages were unreasonably high given site-specific conditions. Lower pass-by totals would mean there would be more diverted trips from I-80 or new trips (i.e., from home to the site). Both types of trips contribute to more vehicles on Sierra College Boulevard and project-generated VMT.
60	Number of new daily trips generated by project was underestimated due to pass-by assumptions	Pass-by percentages were appropriate	<p>We reiterate our previous concern that since the peak hour pass-by percentages were too high, so were the daily percentages (because the RDEIR assumed those same percentages for daily).</p> <p>The data in <i>Appendix B</i> of the <i>FEIR</i> introduces a new, very concerning assumption built into the analysis:</p> <ul style="list-style-type: none"> <li>➤ <b>The Loomis Costco store would have a daily trip rate that is 21 percent lower than that of the Roseville store with both stores in operation</b> (per Table 1 above), If the two stores are causing a redistributed market served by each of them, why would such a discrepancy exist? Wouldn't some members shift to the less busy Loomis Store?</li> </ul>
61	Project's net increase in VMT has been underestimated	VMT calculations were appropriate and further supported by VMT sensitivity analysis memo (Appendix B)	<p>The project's VMT was underestimated because of the following shortcomings or unsubstantiated assumptions in the analysis:</p> <ol style="list-style-type: none"> <li>(1) The project's gross daily trip generation was underestimated due to lack of consideration of number of fueling pumps (see comment 58).</li> <li>(2) The number of new and diverted-link trips generated by the project, which generate VMT (while pass-by trips do not) was underestimated (see comment 59).</li> <li>(3) Applicant assumptions regarding increase in market share and induced travel demand caused by new store opening are unsubstantiated:             <ul style="list-style-type: none"> <li>➤ Appendix B to the FEIR reiterates the RDEIR applicant-supplied assumption that membership under the two-store concept will increase 8.7 percent.</li> </ul> </li> </ol>



**Table 3: Rebuttal to Responses to Fehr & Peers' Comment Letter Dated February 7, 2020**

Comment #	Overview of Comment	Response	Rebuttal
			<p>➤ Appendix B introduces new member visitation frequency data that suggests members remaining at the Roseville store may visit that store once or twice more per year as a result of a new store being opening.</p> <p><b>Table 2 above indicates that the two-store model would result in the combined daily trip rate decreasing from 122 trips per KSF (Roseville store only) to 89 trips per KSF, a 27% decrease. This implies the two-store model will generate substantially less foot traffic, resulting in potentially less profitable financial performance.</b> The professional opinion of an independent economist would be valuable in addressing this item.</p> <p><b>Appendix B concludes that the VMT of the Roseville Costco store will decrease from 121,563 to 40,961, a 66% reduction.</b> Because the Loomis Costco RDEIR analysis is contingent upon this reduction (from a different store in a different City), it seems reasonable that monitoring of before and after conditions at the Roseville Costco store (using big data sources such as Streetlight, Inc, etc.) should be performed to confirm this reduction is achieved. If it is not achieved, then TDM strategies should be implemented at both stores to reduce VMT to levels assumed in the DEIR.</p>
65	Project use of Brace Road east of the project by outbound trips was underestimated	No project trips were routed on Brace Road to I-80 because it would be "substantial out-of-direction" travel, assignment was 'worst-case', and DEIR comment did not provide sufficient evidence	We reiterate our previous comment that Brace Road will likely be used by outbound motorists to travel eastbound on I-80. Technical analyses demonstrated that route could be 1.5 minutes faster than using the I-80/Sierra College Boulevard interchange. The counterargument that this would be 'out of direction travel' has no merit. Many agencies on the I-80 corridor are dealing with motorists who regularly divert off the freeway onto surface streets that are less direct, but provide a quicker travel time due to the proliferation of wayfinding smart phone apps. This "out of direction travel" is clearly happening, and is something many agencies are grappling with.
66	Fueling Station Queuing Concerns	New information is provided to demonstrate that fueling station queues can be accommodated on site.	In response to this comment (and potentially a similar one by another entity, see Mooney-55), new information was presented in a six-page response. Due to the limited timeframe for reviewing content, we have not had sufficient time to delve into this new information, and so we are not able to comment on it at this time. However, it is notable that two engineering consultants independently came to the same conclusion that excess queuing is likely to be a concern at the proposed fueling pumps.



**Table 3: Rebuttal to Responses to Fehr & Peers' Comment Letter Dated February 7, 2020**

Comment #	Overview of Comment	Response	Rebuttal
69	Cumulative analysis does not consider trips from future developments	Response indicates three of the four identified projects were included in the model used to develop cumulative forecasts	The response completely disregards the key point of this comment. Namely, the cumulative analysis does not properly reflect these projects in its forecasts and operations analysis along Sierra College Boulevard. For example, Granite Marketplace, one of the projects, is entirely accessed from the east leg of the Sierra College Boulevard/Granite Drive intersection. While the response states that the model estimates this project to generate 414 PM peak hour trips, a net increase of only 100 trips over existing conditions is reflected in the cumulative forecasts. Had these projects been properly considered, cumulative operations would be worse than reported. Just claiming that these projects "were in the model" is not a satisfactory response, as the technical analysis derived from that model suggests otherwise.
71	Microsimulation should have been performed to analyze study corridor	Response reiterates suitability of approach taken in the RDEIR, and cites several other agencies that also use Synchro (non-simulation) in their studies.	We wholeheartedly disagree with the response statement that "Implementing HCM methodologies with Synchro software is commonly used by neighboring agencies, including Placer County, City of Rocklin, City of Roseville, and Sacramento County". This response is misleading as evidenced by the following. The recently adopted Placer Ranch Specific Plan in Placer County, the draft Roseville General Plan Update, and the ongoing City of Rocklin Circulation Element update all relied heavily on microsimulation. Studies in Sacramento County have relied on microsimulation as early as 2001 (see South Watt Area Transportation Study). Near interchanges, on coordinated corridors, and near tightly spaced intersections, microsimulation was chosen as the most appropriate tool for analysis by these agencies. We know this because we performed these studies. Smith Engineering & Management independently reached a similar conclusion that microsimulation should have been performed and that LOS and delays have been underestimated (see Mooney comments 60 and 61). The response does nothing to dispel the serious concerns that we and other reviewers have regarding the use of the deterministic HCM methods to analyze the project.
72-81	Because microsimulation was not used, certain project impacts were not identified	Range of responses, frequently citing adequacy of using HCM deterministic methods to analyze corridor	We reiterate our previous concerns over not applying microsimulation in the Sierra College Boulevard corridor.
86	Signalized project driveway on Sierra College Boulevard	Introduces new analysis that replaces RDEIR analysis	The revised analysis of the signalized project driveway in this response indicates that under cumulative long term plus project conditions, the eastbound and westbound approaches, and northbound and southbound left-turns would all operate at LOS



**Table 3: Rebuttal to Responses to Fehr & Peers' Comment Letter Dated February 7, 2020**

Comment #	Overview of Comment	Response	Rebuttal
	does not provide adequate storage		F during the PM peak hour. And the northbound through queue would extend back into Granite Drive, thereby blocking access to this short (160 foot) right turn lane. Vehicles exiting the Costco site would queue over 300 feet back into the site, more than twice the available storage provided. Despite all of these challenges, the reported LOS is an acceptable "C", which hardly seems to describe what a LOS C condition should look like. We reiterate our original comment that lane configurations at this intersection are inappropriate.
87	Project would worsen queuing at the I-80 WB off-ramp at the Sierra College Boulevard interchange	States that simulation was not necessary and that mitigations would improve operations in the study corridor. No response is provided regarding extent of vehicular queuing at this off-ramp.	The analysis cited in our comment is based on microsimulation and indicated that under cumulative long-term plus project conditions, the 95 <sup>th</sup> percentile queue length on the westbound off-ramp would exceed one mile in length (with the project worsening the condition). The queue would extend a considerable back on the freeway. This phenomenon is present at other off-ramps on I-80, most notably in Sacramento County. The issue is that the surface street does not have adequate capacity to accommodate the exiting freeway volume, which then spills back onto the mainline. This effect is captured in microsimulation analysis, but not the deterministic HCM-based synchro analysis used in the DEIR.
89	Provide details of follow-up meetings with Caltrans	An evaluation of off-ramp queuing is provided along with a discussion of previous meetings with Caltrans and a draft agreement for improvements	Oddly, the initial response to this comment is a supplemental freeway off-ramp queuing analysis, which concludes that "it is possible that queues could extend beyond the available storage length at the I-80 WB Ramps & Sierra College Boulevard". <b>This admission supports our assertion in comment 87, that the project would cause freeway off-ramp queuing impact at the Sierra College Boulevard off-ramp, which was not identified.</b>
90-91	Relocate project driveway to the north	A variety of concerns related to possible safety and access impacts, which preclude such a relocation	The response does not acknowledge that the driveway placement is self-serving, would negatively affect corridor traffic operations, and would adversely affect access opportunities to the parcel on the opposite side of the street.

Source: FEIR.

## Figure 1

- 20 ZIP codes in Loomis Costco Store market = 19% (18+ persons) would be members.  
**Four Out of Five People In Primary Market Zip Codes Would Not Be Members.**
- If 80 percent of US disposable income is spent within 20 miles of home, and the average shopper lives 22 miles from the store, **why would they already be driving on Sierra College Boulevard?**
- Consider the following if FEIR assumptions are used:
  - 19% of 2,060 existing PM peak hour motorists on Sierra College Boulevard are Costco members.
  - RDEIR assumed 179 inbound pass-by trips are made. **Almost 1 of every 2 Costco members driving by the site is required (per the RDEIR) to enter the site.**
  - Average Costco member Visit Frequency (per FEIR): Once every one to two weeks. **Why do so many different Loomis Costco members happen to be on this particular segment of Sierra College Boulevard?**



## Proposed sidewalks to 80 overpass

Cheryl Benson <ca.benson@yahoo.com>

Tue 7/7/2020 4:11 PM

To: Costco Comments <CostcoComments@loomis.ca.gov>; Sean Rabe <Srabe@loomis.ca.gov>; Jan Clark-Crets <JClark-Crets@loomis.ca.gov>

I do not agree to the town of Loomis taking property in front of my house for any reason.

Cheryl Benson  
5515 Brace Road.  
Loomis, Ca. 95650



## Costco Traffic mitigations inadequate for senior citizens

Geoff McLennan <gtmclennan@gmail.com>

Tue 7/7/2020 3:55 PM

To: Costco Comments <CostcoComments@loomis.ca.gov>

Cc: Bill Halldin <Bill.Halldin@rocklin.ca.us>; kbroadway@ups.com <kbroadway@ups.com>

Dear Costco City Officials, Planners, and Traffic Engineers

I am a 35 year resident of Placer County and Rocklin and a senior citizen.

I am also a former planning commissioner for Rocklin with reasonable training and education in traffic mitigation, off and on-site circulation, and knowledge of most current state and federal transportation laws and regulations. I also served as a public planning official in the City of Sacramento prior to Rocklin.

It is my opinion that your present circulation plan is inadequate and does not address safe, adequate access for 131,000 senior citizens of Placer County (110,000 in just Sun City and Lincoln Hills) and likely senior visitors and senior communities because:

1. Senior parking spaces are not designated or easily accessible.
2. No public or private transit stops, and drives, lanes, benches are noted on your plans per the EIR, exhibits, and public notices.
3. It does not appear you will offer special accessibility services, carts, etc to seniors within the store/"warehouse". Like other stores, this will be a clear test of your sincerity and concern for seniors.

The 3 preceding points indicate your design and planning team have not considered senior citizen shoppers. Many elderly persons cannot or should not drive because of declining driving abilities. Many seniors cannot navigate crowded store aisles. Why generate traffic when you can provide and invite public transportation onto the site?

There are solid economic indicators having 30%+ of the county as seniors including household wealth, disposable income, and educational attainment. I am not opposed to another Costco but am concerned that as proposed, the Loomis Costco lacks careful planning being about senior shoppers in Placer County.

For these reasons, I urge the Town Council to send this plan back for amendments on behalf of senior citizen shoppers.

--

***Thanks, Geoff McLennan***

**LAW OFFICE OF DONALD B. MOONEY**

417 Mace Blvd, Suite J-334

Davis, CA 95618

503-758-2377

dbmooney@dcn.org

July 7, 2020

***VIA ELECTRONIC MAIL***

***costcocomments@loomis.ca.gov***

Planning Commission  
Town of Loomis  
c/o Costco Comments  
3665 Taylor Road  
P.O. Box 1330  
Loomis, CA 95650

***Re: Loomis Costco Recirculated Draft Environmental Impact Report***

Dear Commissioners :

This office represents Daljit Bains and submits the following comments and the attached comments dated July 6, 2020 prepared by Daniel Smith, Smith Engineering & Management, regarding the Loomis Costco Final Environmental Impact Report (“Final EIR”). As an initial matter, Mr. Bains objects to the proposed project on the grounds that the Final EIR fails to meet the legal requirements of the California Environmental Quality Act (“CEQA”), Public Resources Code, section 21000 *et seq.* and the CEQA Guidelines, section 15000 *et seq.* (Title 14 California Code of Regulations § 15000 *et seq.*) The Project as proposed also violates the requirements of the Planning and Zoning Law, Government Code, section 65300, *et seq.*, as it is inconsistent with mandatory and policies of the Town of Loomis General Plan.

**A. THE FINAL EIR CONTAINS A FLAWED PROJECT DESCRIPTION**

The enclosed letter Mr. Smith regarding the Final EIR’s traffic analysis demonstrates that the Final EIR fails to adequately disclose, analyze and mitigate the Project’s traffic impacts. Mr. Smith’s findings reveal the flaws in in the Final EIR’s Project Description. As discussed in Mr. Bains’ previous comments, CEQA requires that an environmental review document contain an accurate description of the entire project. (*County of Inyo v. City of Los Angeles* (1977) 71 Cal.App.3d 185, 193.) The adequacy of an EIR’s project description is closely linked to the adequacy of the impact analyses. If the description is inadequate because it fails to discuss an aspect of the project, the environmental analysis will probably reflect the same mistake. (*See San Joaquin Raptor/Wildlife Rescue Center v. County of Stanislaus* (1994) 27 Cal.App.3d 713, 722-723.)

In *County of Inyo*, the court stated that “[a]n accurate, stable and finite project description is the *sine qua non* of an informative and legally sufficient EIR.” (*Id.*)

CEQA requires a complete project description to ensure that all of the project's environmental impacts are considered. (*City of Santee v. County of San Diego* (1989) 214 Cal.App.3d 1450, 1454.) As stated in *County of Inyo*, "[a] curtailed or distorted project description may stultify the objectives of the reporting process. Only through an accurate view of the project may affected outsiders and public decision-makers balance the proposal's benefit against its environmental cost, consider mitigation measures, assess the advantages of terminating the proposal (i.e., the "no project" alternative) and weigh other alternatives in the balance." (71 Cal.App.3d at 192-193; see also *Communities for a Better Environment v. City of Richmond* (2010) 184 Cal.App.4th 70, 82 [court found project description inadequate where EIR concealed, ignored, excluded, or simply failed to provide pertinent information" regarding a reasonably foreseeable consequence of the project].) A curtailed, enigmatic or unstable project description draws a red herring across the path of public input." (*San Joaquin Raptor Rescue Center v. County of Merced* (2007) 149 Cal.App.4th 645, 656; quoting *County of Inyo, supra*, 71 Cal.App.3d at 197-198.)

Please refer to Mr. Smith's letter that identifies and discusses numerous instances where the Project Description misstates and misrepresents the Project. The result is an inadequate Project Description that results in misinformation to the public and the decisionmakers.

**B. THE FINAL EIR FAILS TO ADDRESS THE PROJECT'S INCONSISTENCY WITH THE ZONING ORDINANCES**

The Final EIR also fails to adequately address the failure to amend the zoning code. The Final EIR, along with the Staff Report fails to provide an adequate discussion regarding the Project's inconsistency with the current zoning. The Response to Comments and Staff Report state that no zoning change is proposed for the parcels or portions of the parcels zoned RH or RM-5 as these parcels would be used for parking, which is a permitted use in those zones. This assertion is not support by the Town's Zoning Code. Table 2-2 in Loomis Municipal Code section 13.24.040 sets forth the allowable land uses for residential zoning districts, including RM and RH. (See also LMC, § 13.22.030.) Nothing in Table 2-2 identifies a parking lot for a commercial project as an allowable use for residential districts. To the extent, similar and compatible uses may be allowed within a zoning district, the director must make appropriate findings as set forth in section 13.22.030(A)(3)(a). No such findings have been made. Moreover, such findings of compatibility and consistency cannot be made.

The driveway entrance to the Project located on Brace Road is also located on land zoned residential. Again, nothing in the zoning code provides that a driveway for a commercial center constitutes an allowable use in a residential district. (See Table 2-2, LMC 13.24.040.)

**C. MITIGATION MEASURE NOISE 2**

The Final EIR modifies Mitigation Measure Noise-2 to require all truck deliveries entering and exiting the project site between 10pm and 7am are restricted to the exclusive use of the Sierra College Boulevard driveway and shall not use the Brace Road access. The Final EIR fails to state how this mitigation measure will be enforced as the Brace Road access will not be gated or controlled. Mitigation measures must be enforceable. Under CEQA “[a] public agency shall provide the measures to mitigate or avoid significant effects on the environment are fully enforceable through permit conditions, agreements, or other measures. (Pub. Resources Code, § 21081.6(b). Simply stating that a driveway cannot be used between 10 pm and 7 am does not mean that trucks will not use the driveway if it is more convenient to them. Moreover, simply putting a sign at the Brace Road driveway would not suffice as the driver would not see the sign until the truck had already turned on to Brace Road.

The Project continues to violate Loomis Municipal Code section 13.30.070(C)(4) which provides:

Truck deliveries to a commercial or industrial parcel adjacent to a residential zoning district shall be limited to *the daylight hours unless the director authorizes other delivery times based on the determination that there is either no feasible alternative*, or there are overriding transportation and traffic management benefits to scheduling deliveries at night. (Emphasis added.)

(See also General Plan, Public Health and Safety Element, Policy 18.) The Final EIR modified mitigation measure to restrict truck traffic at the Brace Road entrance between 10 pm and 7 am. That mitigation measure still violates section 13.30.070(C)(4) as daylight hours vary during the year. Also, nothing in section 13.30.070 defines daylight hours as 7 am to 10 pm. In fact, Table 3-4 discusses normal daylight hours for construction to between 7 am to 7 pm Monday through Friday and 8 am to 7 pm between on Saturday.

The EIR states that despite the Town of Loomis’ General Plan’s limitation of truck deliveries to daytime hours for area adjacent to residential uses there is no feasible alternative. (RDEIR at 3.6-18.) The EIR fails to adequately address why there are no feasible alternatives to the truck delivery site or that there are overriding transportation and traffic management benefits to scheduling deliveries at night. The determination that there are no feasible alternatives must be supported by substantial evidence. (*Habitat & Watershed Caretakers v. City of Santa Cruz* (2013) 213 Cal.App.4th 1277, 1305; *King County Farm Bureau v. City of Hanford* (1990) 211 Cal.App.3d 692, 737.)

The EIR provides no discussion as to what alternatives were evaluated and considered not feasible for purposes of truck deliveries complying the General Plan and section 13.30.070. The EIR does not address adjusting the site layout so that truck traffic

would not be allowed to enter or leave on Brace Road. While the Town attempts restrict the delivery, the Final EIR still fails to state why there are no feasible alternatives to the truck delivery site. In fact, alternative 2 constitutes a feasible alternative.

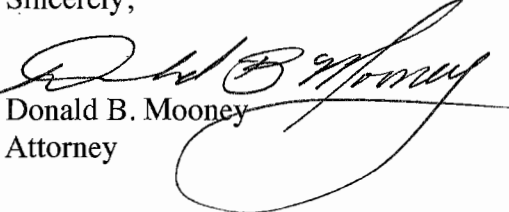
**D. ALTERNATIVES**

Mr. Smith's letter further elaborates the Final EIR's failure to address the feasibility of alternatives such as reducing the size of the warehouse store or eliminating the fueling facility. Such alternatives are dismissed on the grounds that they do not the project objectives. As stated in previous comments, a lead agency must ensure "that all reasonable alternatives to proposed projects are thoroughly assessed." (*Wildlife Alive v. Chickering* (1976) 18 Cal.3d 190, 197; Pub. Resources Code, § 21001(g) (lead agency must "consider alternatives to proposed actions affecting the environment"); *Laurel Heights I, supra*, 47 Cal.3d at p. 400.) The agency evaluates whether the alternatives are actually feasible. (*California Native Plant Society v. City of Santa Cruz* (2009) 177 Cal.App.4th 957, 981; CEQA Guidelines, §§ 15126.6(c), 15091(a)(3).) A determination of infeasibility must be based upon substantial evidence, not just that it fails to meet an objective.

**E. CONCLUSION**

As demonstrated in these comments and Mr. Smith's comments, the Final EIR fails to meet CEQA's procedural and substantive requirements. Moreover, the Final EIR fails as an informational document to the decisionmakers and public.

Sincerely,



Donald B. Mooney  
Attorney

cc: Daljit Bains



SMITH ENGINEERING & MANAGEMENT

July 6, 2020

Mr. Don Mooney  
Law Office of Donald B. Mooney  
417 Mace Boulevard, Suite J-334  
Davis, CA 95618

**Subject:** Loomis Costco Recirculated Draft Environmental Impact Report

Dear Mr. Mooney:

Per your request, I have reviewed the Final Environmental Impact Report (hereinafter the "FEIR") regarding the proposed Costco retail warehouse Project (the "Project") in the Town of Loomis (the "Town"). I previously reviewed and commented on the original 2018 Draft Environmental Impact Report (the "DEIR") and the subsequent Recirculated DIER (the RDEIR) for the subject project in letters dated July 20, 2018 and January 31, 2020. My qualifications to perform this review were thoroughly documented in that July 20, 2018 letter and my professional resume was attached thereto.

The findings of my review of the FEIR follow.

**The Project Description in the FEIR Is Flawed In Several Respects**

The Westerly Driveway to Brace Road: The FEIR Project Description states at Section 2.3.2.2.3 that the Project would have "an unsignalized right-in, right-out driveway on Brace Road approximately 280 feet east of Sierra College Boulevard". In fact, the FEIR Figure 2-1 Site Plan shows the location of this driveway only approximately 153 feet separation between the Brace Road driveway and Sierra College Boulevard, measured conventionally from near side curb return to near side curb return per the scale on the subject figure. The Project Description grossly overstates the separation distance between the proposed driveway and Sierra College Boulevard.

Fuel Deliveries: FEIR Project Description Section 2.3.4 states that “Fuel would typically be delivered to the fueling station by double-axle trucks”. Actually, single-unit, double-axle fuel delivery trucks have become almost nonexistent. Single-unit fuel delivery trucks are almost universally 3-axle vehicles. And deliveries by 5-axle tractor-trailer rigs and 7-axle tractor-double trailer rigs are quite common. The notion that fuel deliveries would be by 2-axle units is implausible.

Night Delivery Pattern: FEIR Project Description Section 2.3.4 also states: “Nighttime deliveries of all types would be restricted to use of the Sierra College Boulevard access point only between the hours of 10 PM and 7 AM and will not use the Brace Road access. This is a change to this Final EIR Project Description made to be responsive to comments on the 2019 RDEIR. Warehouse deliveries using Sierra College Boulevard would enter via this new intersection and turn around and turn around and back into the truck bays and then leave via the Sierra College Boulevard intersection.” Presumably what the authors of this passage mean is that the off-hours delivery trucks would follow the looping path of the fuel delivery truck pattern until almost returning to Sierra College Boulevard, then back into the loading dock area. However, this forces the truck drivers to make “blind” right hand backing turns into the loading dock area, a highly undesirable maneuver. A better assumption would be for the trucks to pull straight in from Sierra College Boulevard past the aisle to the loading dock area, than make “sighted” left hand backing turns into the loading docks. But either of these patterns will be problematic if there are any significant numbers of employees entering for overnight shifts while trucks are maneuvering thusly.

Brace Road Emergency Access/Egress: The FEIR Project Description now treats the second Brace Road access near the northeast corner of the Project site as an emergency access/egress only. But the Project Description fails to mention what process would have to be followed to convert this to a public access should the limitations of the current public access/egress points to the site prove to cause intolerable congestion and the City and Costco desire to open the emergency access to general public use in response.

Turn Restrictions at Sierra Meadows Apartments: Nowhere in the FEIR Project Description or other FEIR supporting documentation nor in the RDEIR and its supporting Appendices is there any mention of limiting the driveway to Sierra Meadows Apartments that is located just east of the proposed Costco truck access driveway to Brace Road to right-in, right-out movements only as is proposed for the Project’s driveway to Brace. However, property owners and residents have expressed concern that this is the Town’s intent. The FEIR Project Description is inadequate in failing to make clear what the Town’s intent

is with regard to any restrictions in movements to/from the Apartment's existing driveway at this location.

Ambiguity re Granite Drive Access/Egress: The FEIR Project Description is ambiguous as to whether a proposed direct access to Granite Drive is part of the Project. FEIR Project Description Section 2.3.2.1.3 states in part: "Should the City of Rocklin grant access, in coordination with the City of Rocklin, Costco will be conditioned to construct driveway access to the edge of the Costco property that would connect to access provided as part of an anticipated development involving the adjacent property, and would ultimately provide another access point for the project to and from Granite Drive. With Costco, City of Rocklin and Town approval of the connection location, the Granite Drive connection to the Costco site will be aligned with a connection constructed on this adjacent property."

However, in a footnote to FEIR Project Description Section 2.3.2.1 the Project Description states: "The Town has also included the potential for a roadway connection between the south side of the Costco site and Granite Drive as Condition of Approval 19. This is required only if access between the Costco property and Granite Drive is sought by the City of Rocklin and the adjacent land owner."

Costco and the Town cannot have existence or non-existence of a major access element of the Project such as connection to Granite Drive both ways. The FEIR Project Description must inform the public whether the Granite Drive connection is a definite element of the Project or not. It cannot incorporate it as a 'maybe yes, maybe no' indefinite element. In this regard, the FEIR Project Description is inadequate.

## **Safety Issues**

There are several features in the site plan that prompt traffic safety concerns as follows:

Swept Area on Truck Turns: The FEIR Project Description Site Plan (Figure 2-1) shows the swept areas<sup>1</sup> for large articulated trucks entering, moving through and leaving the Project site to service the warehouse store loading docks and the fueling facility. There are several points at which the swept area overruns the limits of the designated traffic lanes or circulation aisles, creating a potentially hazardous situation or goes right to the limits of the lanes or aisles, meaning the driver has to select a perfect turning line – no margin for error – to avoid a hazardous situation. Some of these points are as follows:

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<sup>1</sup> Swept area refers to the area crossed by some part of the truck body due to the off-tracking of articulated trailer units.



- On the entry from Brace Drive near the northwest corner of the site, the trailer of a truck turning right into the driveway would sweep well into the left turn lane servicing the lumber yard driveway on the opposite side of Brace Road. Also, at this same entry point, the trailer would sweep all the way across the northbound exit lane from Costco, creating hazard for any vehicles attempting to exit at that time. Moreover, the truck driver would have to select a perfect turning line to avoid having the trailer completely overrunning the east limit of the driveway.
- At the next curve on this same approach, where entering trucks turn from southbound to westbound, the driver would have to select a perfect line to avoid overrunning the interior limit of the aisle and the trailer would sweep across a large portion of the outbound traffic lane.
- At the next curve, where entering trucks turn from westbound to southbound, the trailer would sweep across almost the entirety of the outbound lane at a point where the warehouse building obstructs sight distance and the driver must select a near perfect turning line to avoid the trailer hitting the corner of the building.
- Near the loading docks at the southeast corner of the warehouse store, where entering trucks must pull forward of the docks and then back into them, trucks making these maneuvers would completely block access and egress to the 40 parking spaces near the southwest corner of the building that depend upon the same aisle. Situationally unaware motorists who get mixed up in the truck backing operations would be at hazard.
- On the exit turn from the dock area and turning onto the egress to Sierra College Boulevard, trucks must take a perfect line to avoid overrunning the limits of the exit aisle from the dock area.
- Fuel supply vehicles entering via the driveway from Sierra College Boulevard are shown to make an exaggerated right turn into the fuel storage tank area, apparently to avoid potentially queued vehicles approaching the fueling area. Drivers making this exaggeratedly sharp turn must take a perfect line to avoid overrunning the east limits of the aisle in the tankage area.
- Fuel supply vehicles departing the tankage area must take a perfect line on the turn from southbound to eastbound.
- On the turn from eastbound to northbound the trucks must take a perfect line to avoid striking vehicles parked along the south boundary, are shown actually overrunning the island delimiting the northbound aisle and must take a perfect line to avoid hitting vehicles in the parking spaces on the east side of the northbound aisle.
- On the turn from northbound to westbound on the main exit to Sierra College Boulevard, truck drivers must take a perfect line to avoid overrunning the islands on the southwest and northwest sides of this turn.

In summary, the Project has jammed the site with so much building and parking and fueling service facility and queue storage that the truck access/egress provisions are below the bare minimum margins of adequacy.

Potential for U-turn Exits at the Brace Driveway: Although the Project Description indicates that the driveway to Brace Road near the northwest corner of the site will be right-in/right-out only, since enforcement will inevitably be intermittent and infrequent, regular Costco customers will know that they can avoid congestion at the main access point by exiting to Brace, slithering out to the left turn lane that provides access to the lumber yard and using it to make a U-turn to gain access to either direction of Sierra College Boulevard. Or worse, if they are intending to go west on Sierra College Boulevard, once in the turn lane they can just cut through the lumber yard.

Potential Conflict of Brace Driveway Exits with Sierra Meadows Driveway Traffic: The separation distance between proposed Project driveway to Brace Road and the westerly driveway of the Sierra Meadows Apartments is only about 30 feet and there will be a sound wall in between to the street right of way which will limit sight lines. This proximity and sight distance limitation could produce hazardous conflict.

Conflict of Brace Driveway Design with Truck Exits from Lumber Yard: Heavy trucks exiting from the lumber yard wishing to return to Sierra College Boulevard, particularly in the direction of I-80 use the yard's driveway to Brace to make the signal-protected left onto Sierra College Boulevard. The swept path of these trucks turning out of the driveway actually crosses the limits of the eastbound left turn lane into the lumber yard driveway. Given the current light left turn volume into the lumber yard, and the clear sight distance, this is not a problem. However, the Project proposes to construct a solid median in this area in (as we describe above) a futile attempt to prevent left turns out of the Project's proposed Brace driveway. The positioning of this median would obstruct the turning of trucks exiting the lumber yard driveway.

Recommendation: Since the westerly Brace driveway was originally intended primarily as a truck access, since the Project has already shifted all but a handful of truck deliveries to the main entrance from Sierra College Boulevard marginalizing the need for the Brace driveway as a truck access, since the design fails to prevent de-facto left turns out of the Brace exit, since the design interferes with truck movements from the lumber yard, and since there is potential conflict with the movements from the Sierra Meadows Apartments driveway, limit all truck movements to the Sierra College Boulevard entrance and limit the westerly Brace Road driveway to emergency access/egress like the easterly one, and eliminate the raised median. Alternately, require additional right of way on Brace Road on the Project frontage to further offset the centerline sufficiently south so that heavy truck right turns exiting the lumber yard can be completed entirely within the westbound lane area and provide a raised median on the south side of the eastbound left turn lane into the lumber yard so that

vehicles from Costco's driveway cannot slither out to the left turn lane to make a U-turn or de-facto left.

### **Response to Comment on Fueling Facility Queues Is Inadequate**

Our comments on the RDEIR provided conclusive visual evidence that Costco is extremely poor at predicting and designing for fueling facility demands and peak queues or that there is a corporate strategy to just shoehorn in whatever fueling facility appears to fit, get the permits and build it and react-to or live-with the problems later. The FEIR response to comment is a study in evasion that would do White House Press Directors proud. Oh, this one has fewer fueling positions (well, that was the flaw). Oh, this one got revised (again, the need to revise was admission of the flaw). Oh, this one got moved off-site (well, the need to move off site is indicative of the original flaw).

The problem with this evasive response is that if the queue problem at this proposed Costco blocks what may be essentially may be the de-facto sole access to this whole site, the entire entry queue will compound the extensive queuing problems on Sierra College Boulevard that the FEIR and RDEIR already predict are serious. This would have highly significant public safety consequences. This becomes all the more concerning since Costco and the Town have eschewed the notion of analyzing the Project's traffic effects during the peak Thanksgiving to New Year shopping peak season.

### **FEIR Response to Comments Regarding Public Street Queues Inadequate**

The RDEIR disclosed that there would be extensive queuing at numerous public street and State Highway intersections. As pointed out in our comments on the RDEIR, the analysis sheets buried in Appendix C to FEIR Appendix E, the analysis program that was employed by the RDEIR preparers warns that was employed in the RDEIR warns that the queues predicted therein may actually be longer. The FEIR response simply denies that the warnings in the program they relied upon are reliable (comparable to White House Press Secretary denials again) and asserts the analysis they did do was adequate. Our comments on the RDEIR recommended a more sophisticated procedure as did respected consultants to the City of Rocklin Fehr & Peers, but the Town and its consultants irresponsibly reject that approach. The response is inadequate.

### **Alternatives to the Project**

Alternatives to the Project such as reducing the size of the warehouse store or eliminating the fueling facility are dismissed on basically fabricated suppositions of inability to meet the needs of Costco's customers and the Town's objectives (presumably collecting more sales tax revenues) despite the fact that Costco successfully operates smaller format stores and stores without fueling facilities

and despite the lack of evidence of inadequate fueling facilities nearby. Both of these options would have substantially changed the traffic consequences of the Project (perhaps not eliminating significant impacts but lessening the severity) and/or the internal traffic flaws described above although this was not analyzed in detail. Moreover, there is no meaningful analysis evidencing that Costco could not develop a similar facility with less impact on available sites nearby.

### **The FEIR and RDEIR Traffic Analysis Fails To Provide for Ultimate Development of the Vacant Parcel on the West Side of Sierra College Boulevard Opposite the Project Site**

The largely undeveloped site on the west of Sierra College Boulevard opposite the Project site has a partially improved access more or less directly opposite the Project's proposed access/egress driveway from Sierra College Boulevard. The FEIR claims the proposed signalized intersection with the Project's access driveway will also provide for ultimate to the site on the opposite side. But although it provides a median opening, it fails to provide a left turn lane or left turn phasing to the existing access to the west side property. This should be provided. Also, the current Project Site Plan (FEIR Figure 2-1) eliminates the raised median on Sierra College Boulevard in order to provide a southbound left turn lane into the Project's main access drive. This is detrimental to the safety characteristics of Sierra College Boulevard in this area, a fact not noted in the FEIR or prior environmental documents. The Project should widen Sierra College Boulevard appropriately to maintain a raised median in this area and make appropriate right-of-way dedications to do so if necessary.

### **The FEIR Distains to Provide a Peak Shopping Season Analysis**

Our prior comments noted that the RDEIR had failed to provide a traffic analysis for the peak shopping season between Thanksgiving and New Year when traffic in the Project area is undeniably intensified by both shopping traffic and holiday recreational traffic in the I-80 corridor. The response, in essence that the Town, Costco and their consultants had met and decided that such analysis was unnecessary, is inappropriately dismissive and inconsistent with the good faith effort to disclose impact that CEQA demands.

### **Conclusion**

This concludes my current comments on the current Loomis Costco FEIR.

Based on the above, I am convinced that the FEIR is inadequate, and that it is unsuitable for certification in its current state and that its supporting analysis must be revised consistent with the matters detailed herein.

Mr. Don Mooney  
July 6, 2020  
Page 8

Sincerely,

Smith Engineering & Management  
A California Corporation



Daniel T. Smith Jr., P.E.  
President

July 7, 2020

Town of Loomis  
Loomis Town Hall  
Taylor Road  
Loomis, CA 95650

Subject: COSTCO EIR / TRAFFIC / BRACE ROAD

In reading the Public Hearing Notice of the Planning Commission I do not understand the 30'right-in/right-out access on Brace Road, In reading it I take it that when coming from Sierra College Blvd one can only make a right turn into the site and when exiting can only make a right turn on to Brace Rd. This puts that traffic on to Brace Rd and there is no freeway access on Brace Rd meaning traffic would have to travel all the way down Brace Rd to Horseshoe Bar Road to access the freeway. Am I reading this correctly if so that is not acceptable unless some traffic mitigations are put into place like stop signs at Betty Ln and Dias Ln. The only stop sign on Brace Rd East of I-80 is at Horseshoe Bar Rd/Laird Rd/Brace Rd intersection. I am not a fan of stop signs but if you are going to dump even more traffic onto Brace Rd something has to be done. If I'm not reading this correctly then please explain it to me.

Thank you, I hope you take what I have suggested into consideration.

Sincerely,

Anna Nakashoji  
3899 Martin Ln  
Loomis, CA 95650


## Comments by Brace Taylor LLC regarding Costco EIR

adamn5993@gmail.com <adamn5993@gmail.com>

Tue 7/7/2020 11:57 AM

To: Costco Comments <CostcoComments@loomis.ca.gov>

Cc: 'Mimi Noorani' <miminoorani@hotmail.com>; 'leila noorani' <leila\_noorani@hotmail.com>; 'Mom' <jennyfan@live.com>

 1 attachments (629 KB)

Brace Taylor Comments on Costco Final EIR.pdf;

Please accept our Costco Final EIR review comments in advance of this evening's planning commission hearing

-Adam Noorani  
Brace Taylor LLC





July 3, 2020

Sent Via electronic mail to [costcocomments@loomis.ca.gov](mailto:costcocomments@loomis.ca.gov)

**To: Town of Loomis**  
**Attn: Anders Hauge**  
**3665 Taylor Rd**  
**Loomis Ca 95650**

**From: Brace Taylor LLC**  
**7892 Oak Glen Lane**  
**Granite Bay, Ca 95746**

**Re: Costco Final Environmental Impact Report - June 2020**

Dear Town of Loomis Planning Department and Anders Hauge,

The owners of the Loomis property at 4011 Sierra College Boulevard, occupied by Homewood Building Supply LLC, express concern that the town of Loomis has not adequately addressed the issues of traffic in their Final EIR. Given our history and significant past accommodations to the Town of Loomis, we request due attention to the project's impact on our operations.

## **HISTORY**

Homewood Building Supply has been a community partner, employer and source of tax revenue to the Town of Loomis since 1990. In 2006, Brace Taylor LLC, a Homewood entity, purchased this Sierra College Blvd property to relocate Homewood's operations. The Town of Loomis actively encouraged Homewood to maintain its local presence and tax base; however, once land was purchased Homewood was subjected to an excessively arduous and consuming approval process. The timing of these events coincided with a severe economic downturn in the building industry. Homewood made significant and costly accommodations to serve the requirements of the Town of Loomis, the community, and other agencies.

## **ISSUES**

Please note our concerns with the current proposal to build Costco:

- **Inaccurate and Unacceptable Traffic Studies:** Reviews performed by Smith Engineering and Fehr & Peers Transportation Consultants indicate the project study's traffic data and analysis are flawed. The Town cannot approve a report based on inaccurate data.

- **Significant and Unacceptable Gridlock and Congestion:** The roads, intersections, and interchanges that will service Costco cannot effectively handle anticipated traffic increases. This oversight will create massive gridlock and congestion on Sierra College Blvd and Brace Roads. *Note:* Current traffic patterns include long queues on northbound Sierra College Blvd at the Taylor Road intersection particularly at peak hours. This congestion is exacerbated by passing trains. It does not appear the train situation has been addressed in Costco planning.
- **Lack of Agency Communication:** A more practical and robust access point to the Loomis Costco via Granite Drive should be a condition of approval. In addition Loomis and Rocklin need to both agree to mitigate traffic issues. The current lack of communication between these agencies is unacceptable. Significant traffic issues are not even being discussed.
- **Code Violation on Brace Road Access:** The proposed Brace Road access violates the Loomis Land Development Plan given its proximity to Sierra College Blvd and the Sierra Meadows Apartments driveway. The basis by which it is potentially allowed is an exception for “infill” projects, yet the description of an “infill project” given is unacceptably vague and does not fit the Costco site description.
- **Brace Road “Right In/Right Out” Entrance:** Costco’s secondary access point on the West side of the Sierra Meadows Apartments will significantly and negatively impact our business operations. It will be used by Costco customers to bypass traffic at the main Sierra College Blvd access. This exiting traffic will indeed use Homewood’s Brace Road entrance as a U-turn to return to Sierra College Blvd. Based on our experience and observations, traffic will cut through the Homewood lumber yard to right exit on to Sierra College Blvd. As Sierra College Blvd cannot handle the anticipated traffic load, Brace Road will become easily gridlocked due to traffic queues from Sierra College Blvd. *Note:* The Town of Loomis has suggested that a “No U-turn sign” could be installed at the left turn lane into Homewood to prevent Homewood’s entry being used as a turn around. This will be ignored by many drivers and will further encourage other drivers to cut through the Homewood yard.
- **Significant Negative Impact on Homewood Deliveries:** Currently Homewood utilizes the Brace Road access for exiting traffic as it is the only efficient route to Highway 80. The Costco project includes adding a raised median at the Homewood “left-in” access on Brace Road. Given the size of Brace Road, currently designated minor street, this median along with the unacceptable traffic increases will make it impossible for most Homewood exiting trucks to return to southbound Sierra College efficiently. The trucks will be forced to exit Homewood on the “right out” Sierra College Blvd. exit which will often be queued up with traffic backed up from the Taylor Road intersection. These trucks will need to find a route through Rocklin or Loomis to return to return to southbound Sierra College or another access to Highway 80. The bottom line here is this situation will significantly impact traffic on Sierra College Blvd and Brace Road, along with costing us significant time and money.

## **CONCLUSION**

The Final EIR does not properly or accurately assess the impacts of this project per CEQA requirements. Given the significant impact on our local business operations at 4011 Sierra College Boulevard, which include damages to real estate values and limits on future tenant usage, we urge the Planning Commission and Town Council to reject the Final EIR and deny the conditional use permit.

Yours Truly,

Adam Noorani

Brace Taylor LLC

Mimi Noorani,

Brace Taylor LLC



**FW: MY PUBLIC COMMENTS ON THE PROPOSED COSTCO IN LOOMIS**

Costco Comments &lt;CostcoComments@loomis.ca.gov&gt;

Tue 7/7/2020 12:28 PM

To: Sabrina Teller <steller@rmmenvirolaw.com>; Jeffrey Mitchell <jmitchell@kmtg.com>; Mona Ebrahimi <mebrahimi@kmtg.com>; Christy Consolini <cconsolini@haugbrueck.com>; Matthew Gerken <Matthew.Gerken@edaw.aecom.com>

Anders Hauge  
Town of Loomis  
Costco Project Manager

On 7/7/20, 10:20 AM, "Mary Beth Van Voorhis" <mvanvoorhis@loomis.ca.gov> wrote:

-----Original Message-----

From: HENRY RABIN <nyhank@wavecable.com>

Sent: Tuesday, July 7, 2020 10:17 AM

To: Mary Beth Van Voorhis <mvanvoorhis@loomis.ca.gov>

Cc: Carol Parker <cparker@loomis.ca.gov>; Greg Janda <greg.janda@rocklin.ca.us>; Bill Halldin <bill.halldin@rocklin.ca.us>; Joe Patterson <joepatterson@gmail.com>; Jill Gayaldo <jill.gayaldo@rocklin.ca.us>; Ken Broadway <ken.broadway@rocklin.ca.us>; Steven Rudolph <Steven.Rudolph@rocklin.ca.us>; david.mohlenbrok@rocklin.ca.us; bret.finning@rocklin.ca.us; Justin Nartker <Justin.Nartker@rocklin.ca.us>

Subject: MY PUBLIC COMMENTS ON THE PROPOSED COSTCO IN LOOMIS

Hello,

I am sorry that this very important FINAL EIR meeting is to be held during Covid 19. My intention was to speak to everyone.

I have many concerns about the configuration and decision making of the proposed Costco.

I think that AE Comm, the initial consulting firm, is highly incompetent.

The findings that "ONE" WAY IN" AND "ONE WAY OUT" to enter COSTCO IS UNACCEPTABLE AND INSANE.

I built my house in Rocklin, near Sierra College, 29 years ago.

I have seen much development in Rocklin and Roseville. I am involved in what goes on in Rocklin. I know all the City Council members

and so on and so fourth. I make  
it my business to pay attention.  
It is my home and my City.

I do a lot of shopping at all  
the centers in Rocklin along  
Sierra College Blvd. Love the  
Studio Movie Grill.

The proposed Loomis Costco  
will impact the citizens of Rocklin  
in huge ways. How the very small  
and very rural city of Loomis  
configures THIS MASSIVE SITE is critical.  
Of course folks from other cities, far  
and wide, will come to shop at Costco.  
Do not get me wrong, I love to shop  
at Costco. I respect that Loomis wants  
to stay a small city.

The decision makers in Loomis need to listen to the decision makers in Rocklin. Our population is over  
60,000. Our leaders have experience and expertise.

IF LOOMIS DOES NOT DEVELOP THIS HUGE  
COSTCO SITE WITH INTELLIGENCE AND  
SMART PLANNING, EVERYONE WILL SUFFER.  
TRAFFIC IMPACT IS A HUGE CONCERN TO ALL  
OF US.

DO EVERYTHING CORRECTLY, AND COSTCO  
CAN BE A WIN WIN.

IF THE CITY OF LOOMIS BLUNDERS IN  
ANY WAY AT ALL, EVERYONE WILL SUFFER.  
IT WILL BE A DISASTER.

We, the neighborhoods and East  
Rocklin, want this to be a  
success. WE LIVE HERE AND SHOP  
HERE AND DRIVE THE STREETS.

Please do not fail, the stakes  
are too high.

Thank you so much for your time.

With warmest regards,  
Margo Rabin







**FW: Costco Traffic - Final EIR Response to Comments**

Mary Beth Van Voorhis &lt;mvanvoorhis@loomis.ca.gov&gt;

Tue 7/7/2020 10:46 AM

To: Costco Comments &lt;CostcoComments@loomis.ca.gov&gt;

See below.

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**From:** Carol Parker <cparker@loomis.ca.gov>**Sent:** Tuesday, July 7, 2020 10:44 AM**To:** Mary Beth Van Voorhis <mvanvoorhis@loomis.ca.gov>**Subject:** FW: Costco Traffic - Final EIR Response to Comments

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**From:** Gary Liss <garyliss@mindspring.com>**Sent:** Tuesday, July 7, 2020 7:28 AM**To:** Carol Parker <cparker@loomis.ca.gov>**Cc:** Jan Clark-Crets <JClark-Crets@loomis.ca.gov>; Tim Onderko <TOnderko@loomis.ca.gov>; Jeff Duncan <jeffrey.g.duncan@gmail.com>; Brian Baker <bigdoginu@yahoo.com>; Rhonda Morillas <rhonda.morillas@gmail.com>; Smith Roger <rdsmith2009@gmail.com>; Gary Liss (Mindspring) <garyliss@mindspring.com>; Pat Miller <millier4395@gmail.com>; Miguel Ucovich <ucovich@hotmail.com>**Subject:** Re: Costco Traffic - Final EIR Response to Comments

I agree with Roger Smith that the Town should require Costco to provide a supplemental traffic study to evaluate the effects of constructing access to I-80 at King Road as a possible mitigation measure for the cumulative impacts of traffic from Costco on top of existing traffic impacts that the Town is facing.

Gary

Gary Liss

916-652-7850

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**From:** rdsmith2009@gmail.com**Sent:** July 6, 2020 8:04 AM**To:** cparker@loomis.ca.gov**Cc:** jclark-crets@loomis.ca.gov; tonderko@loomis.ca.gov; jeffrey.g.duncan@gmail.com; bigdoginu@yahoo.com; rhonda.morillas@gmail.com**Subject:** Costco Traffic - Final EIR Response to Comments

TO: Planning Commission, Town of Loomis

SUBJECT: Final EIR's Response to my Comments on the R-DEIR  
( My comments for Public Hearing on July 7)

I disagree with the response offered to my comment letter on the R-DEIR, in which I asked that constructing new access ramps to I-80 at King Road be included and studied as a long-term mitigation feature for Costco's traffic impacts on downtown Loomis.

The response states: "... the Costco project would not impact the area where the new I-80 access ramps at King Road would be necessary, nor would the new ramps be successful at addressing the impacts of the Costco project."

I disagree with this 'subjective' conclusion.

The Costco Project will definitely have negative effects on the traffic in downtown Loomis, where traffic already (without Costco) is congested at rush hours. Two two major intersections are already (without Costco) at or near failing Levels of Service (LOS), and the EIR has disclosed several traffic impacts have been deemed "Significant and Unavoidable", which means the residents of Loomis will be expected to tolerate them.

In summary... The BIG traffic impacts of dropping a Costco into Loomis, will require some BIG mitigation measures. The option of creating a 2nd access point to I-80 (i.e., at King Rd.) should have been thoroughly studied as part of the Costco EIR process. It wasn't.

**ACTION:** Town should require Costco to provide a supplemental traffic study to evaluate the effects of constructing access to I-80 at King Road as a possible mitigation measure for Costco traffic impacts that the Town is facing.

Sincerely,

Roger Smith  
[\(916\)652-5685](tel:(916)652-5685)