

The Costco staff report and attachments that were given out at the August 4, 2020 meeting will be used again at the August 11 meeting. You can find that staff report here:

<https://loomis.ca.gov/meetings/town-council-special-meeting-august-4-2020/>

An updated Attachment 7 (Post-Final EIR Comments and Responses) is attached to this cover sheet.

LOOMIS COSTCO PROJECT  
 POST-FINAL EIR COMMENTS AND RESPONSES  
 FOR TOWN COUNCIL HEARING, AUGUST 11, 2020

Name/ Date	Comment	Response	EIR Topic	New/ Old Topic	GP/ Code Consistency	Opinion
Robert Auguscik 7/23	Thank you for meeting with me last week. Some of the changes we discussed would benefit the apartments, Costco and the Town and I am willing to discuss restricting our west entrance to a one way only if a solution to our parking lot issues can be reached. I will not allow our access to be restricted if the Town does not help facilitate some sort of agreement to help our property remain functional if and when Costco is built. Sooner or later we know that the street parking on Brace Road will go away, but at that point it will be too late to make any changes. This is the only chance we have to create additional parking to ensure that the	<p>The Town has been and will continue working with the commenter to resolve the owners' long standing and existing apartment parking and access constraints. The existing apartment parking and access constraints are not a result of the Loomis Costco project.</p> <p>Apartment circulation is discussed in FEIR Response to Comment Auguscik-11 and Mooney-14. The Town will ensure the median is sized to allow for current turning movements at the apartments and Homewood Lumber to continue (Condition of Approval 27M) and will retain the existing striping east of the proposed median.</p>	X	Old		

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	apartment can continue to operate as they have for almost 60 years. We have worked very hard to keep our tenant profile in line with what we want to see in our small town. A dysfunctional apartment complex without adequate parking will make it very difficult to retain the type of tenant that we work so hard to attract. I know many of you do not actually live in Loomis, but we do. We care about the safety and welfare of our town.					
Roger Smith 7/31	I disagree with the response to my comments regarding access ramps to I-80 at King Road. Ramps should be studied as long-term mitigation for Costco's traffic impacts and the response is a subjective conclusion. Costco will affect downtown Loomis where there is already traffic and	Traffic modeling does not indicate that Costco will have a significant impact that would be addressed by I-80 ramps at King Road; therefore, the mitigation requested in the comment is not warranted. Caltrans has not suggested such an action, and to the contrary, Caltrans has communicated to the Town that they do not support an interchange at this location due to the proximity of the Horseshoe Bar interchange. While this facility may be appropriate for the Town to consider for future roadway improvements, this	X	Old		

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	near failing LOS levels. A 2 <sup>nd</sup> access point to I-80 at King Road should have been studied and a supplemental traffic study should be provided to evaluate the effects of constructing access to I-80 at King Road as a possible mitigation measure	improvement would not address impacts related to the Loomis Costco project. CEQA does not require mitigation or alternatives that are unrelated to impacts of the subject project.				
Gary Liss 7/31	Consider using the 10-acre Heritage Park as some of Costco's mitigation for valley oaks. Costco could establish a fund to place Heritage Park in the hands of Placer Land Trust to preserve that land more formally as open space. Valley oaks could be planted in Heritage Park. If the combination of existing valley oaks and planting area is not enough, Costco could purchase other lands in Loomis with valley oaks on them.	The Town acknowledges the suggestion. The commenter's suggestion will be considered by the Town during the tree removal permitting process. The Tree Ordinance does not require the specific use of in-lieu fees be identified at the time of project approval or specifically give the Town the option to require the developer to purchase land. Under the Town's Ordinance, the applicant may replant on-site, replant elsewhere in Town, and/or pay the in-lieu fee. Costco has proposed to replant. Although the project would remove 158 protected native oak trees, 63 replacement oaks in 24" boxes are proposed on-site in the preliminary landscape plan, with the remaining 225 valley oak and 6 blue oak replacement trees to be planted off-site or through payment of in-lieu fees in support of the Town's Draft Tree Mitigation Master Plan Planting Assessment.	X	New	X	

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Pat Bach 8/3	Thank you for the link to the responses to comments on the 2018 DEIR. Is it possible to refine the meeting PA system to eliminate the feedback at the public microphone? It was difficult to understand public comments at the last meeting.	Responses to comments on the original 2018 DEIR can be found at: <a href="https://loomis.ca.gov/documents/loomis-costco-2018-comments/">https://loomis.ca.gov/documents/loomis-costco-2018-comments/</a>  The Town has refined the audio system to remove the echo created at the Planning Commission hearing. The issue was resolved for the August 4th Town Council hearing and this resolution will be carried through to the August 11th Town Council hearing.		New		
Daljit Bains 8/3	Please note that at the Planning Commission Meeting there were comments made by Anders and/or members of the Planning Commission, that Rocklin was okay with this project. It is not professional to mislead the public and the citizens and residents of Loomis.	During the July 7th Planning Commission meeting, no statement was made that Rocklin "was okay with the project," and Rocklin's comments on the FEIR were provided to the Planning Commission. During the meeting, it was stated that representatives of the City of Rocklin had agreed with traffic study methodology during previous meetings and had agreed to other changes to the project that were made in response to requests from the City of Rocklin. Neither the Planning Commission nor Town staff nor consultants misled the public regarding Rocklin's previous positions on the adequacy of the analysis and the project design.				X
	For the record, the last time I spoke with Anders, he unprofessionally hung up the phone with me	The commenter's opinions are noted. Mr. Hauge responded to the commenter professionally. Since the commenter has threatened litigation against the Town in the				X

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	<p>while I was still talking. Please confirm with him that this is what happened. It is unacceptable for a hired consultant to do this and he should have answered my questions. I have been professional in my questions and comments and I would expect the same from him.</p>	<p>past, he was notified that his comments need to be in writing rather than directed at Mr. Hauge over the phone. Therefore, the Town appreciates any further communications in writing.</p>				
	<p>The article from the City of Rocklin continues to discuss major flaws with this site plan and the FEIR.</p>	<p>The Town is aware of the City of Rocklin's press release. The Town has fully responded to all comments from the City of Rocklin on the EIR and the project. In certain cases, the Town is unable to incorporate suggestions from the City of Rocklin since those suggestions would create problems related to circulation. For example, adding two turning lanes into the site would create weaving issues that have been demonstrated to create congestion and safety issues elsewhere when this type of design is implemented. Costco and the Town wish to avoid introducing such issues at the project site. Moving the main project driveway to the north, as also requested by the City of Rocklin, would create vehicle/pedestrian conflicts at the entrance of the store that the Town and applicant do not want to create for the project.</p>				<p>X</p>

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	<p>I know the Council's meeting tomorrow night is just a formality and an approval is imminent. I strongly ask the Town Council to be proactive and take the issues that have been raised more seriously. It is in the best interests of Loomis to be proactive now. Please take this opportunity to make the changes that are needed and give Loomis a real chance of securing a Costco by addressing all of the CEQA and zoning and planning issues at the Loomis Council level.</p>	<p>The commenter inaccurately assumes the Town Council does not consider public comments seriously, and that the Town has not made efforts to address public comments and modify the project when feasible or warranted. The record indicates otherwise. In addition to the responses to comments in the FEIR and the history of collaboration with agencies shown in Attachment 6 of the Staff Report, responses to comments made prior to and during the July 7th Planning Commission meeting were provided to the Town Council in Attachment 7 of the Staff Report. Please refer to Attachment 7 for responses to the commenter's July comments.</p> <p>The EIR was prepared by experts and was independently reviewed by the Town, which determined that the EIR fully complies with the requirements of CEQA, that the project entitlements comply with the Planning and Zoning Law, and the project is consistent with the General Plan.</p>	X	Old	X	X
	<p>Please be proactive so we can work together.</p>	<p>Although the commenter implies that the Town has not worked with him, the record shows differently. Anders Hauge has engaged the commenter continuously throughout the project, taking phone calls regularly and listening to the commenters concerns, opinions, and demands. However, the Town is</p>				X

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		not required to accommodate every request made by every Rocklin business owner or every request made by any other party. The Town is required to balance requests and input with environmental outcomes, as well as safety, circulation, aesthetic, fiscal, economic, and other considerations. The Town has many considerations to weigh in the decision-making process, in addition to the commenter's requests.				
	The article below from the City of Rocklin continues to discuss major flaws with this site plan and the FEIR.	Please refer to the following responses to Rocklin's August 3, 2020 press release, "Rocklin Reiterates Concerns with Latest Loomis Costco Plan."				X
	<p>"Rocklin Reiterates Concerns with Latest Loomis Costco Plan" Rocklin Press Release 8/3</p> <p>The City of Rocklin's economic success is intertwined with the entire region and Rocklin views the fiscal health of neighboring municipalities as vital to future growth for all.</p>	The City's opinions are noted. It is agreed that the economic and fiscal health of the two communities are intertwined.				X
	The Town of Loomis has proposed building a Costco store on the Rocklin border	The Town's EIR includes detailed analysis related to transportation infrastructure and public services and feasible mitigation to				X



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	<p>that could generate millions of dollars in estimated sales tax revenues for Loomis. While the City of Rocklin supports economic development in Loomis and welcomes another Costco to our region, the proposed location and site plan present significant challenges to Rocklin's transportation infrastructure, public services and business viability in the area.</p>	<p>address potential future conditions related to traffic congestion. There are no gaps in the analysis related to infrastructure or public services in the EIR. Business viability in Rocklin would be bolstered by a Costco warehouse in close proximity. Traffic impacts associated with Costco would be mitigated through implementation of various measures in Loomis and Rocklin, should Rocklin approve implementation of the mitigation measures located within the City's jurisdiction, which Costco would fund. Furthermore, in addition to the improvements to Sierra College Boulevard through the Town's CIP, which addresses existing traffic associated with existing commercial developments within the City of Rocklin, the Town had also proposed to reimburse the City of Rocklin for a fair-share of the Sierra College Boulevard interchange through a catch-up payment and an ongoing payment over a period of 12 years. As of the Town Council meeting on August 4, 2020, the City of Rocklin had not acknowledged or responded to the Town's offer for this fair-share reimbursement.</p>				
	<p>The FEIR mostly ignores concerns formally expressed by Rocklin in July 2020 and after review of two previous versions of</p>	<p>The Town included detailed responses to each comment on every iteration of the Draft and Final EIR and recirculated the Draft EIR largely in response to requests from the City of Rocklin and other parties to consider</p>	X	Old		

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	the EIR, released in June 2018 and December 2019, respectively. Rocklin and Loomis leaders have also met multiple times since 2018 to try to reach a consensus, but to no avail.	additional transportation access to the site. Responses to Rocklin's comments on the FEIR submitted on July 7, 2020 are provided in Attachment 7 of the Staff Report, and the history of the Town's efforts to work with Rocklin and discuss their concerns, including changes to the project that Rocklin had requested, notably access at Granite Drive and Brace Road, is documented in Attachment 6 of the Staff Report and is also included in FEIR Response to Comment City of Rocklin-57 (and in other responses to comments).				
	Rocklin's concerns focus on the glaring inadequacy of the analysis of traffic impacts of the project, as well as the unreasonableness of recommended mitigation measures to Rocklin streets and intersections.	There is no substantial evidence provided to suggest this is an accurate statement regarding EIR adequacy. While certain studies in the area may have used microsimulation, many other studies use HCM and deterministic methodologies. The appropriate analysis methodology can vary with different projects in different contexts, and the Town, as lead agency, selected the most appropriate and effective methods for the proposed project. Further, the Town notes that Caltrans has reviewed and approved the analyses reported in the EIR and has not identified any additional mitigation needs or the need to change any analysis methods. Accordingly, no changes to the FEIR are needed.		Old		X
	If the project was built as proposed, it would include	The Draft and Final EIRs demonstrate in detail how the proposed access strategy would work,	X	Old		

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	<p>only one main entrance to the large shopping and fueling complex, accessed only from Rocklin built and maintained Sierra College Blvd. This single access point would have poorly designed turning lanes and be located near the entrance to the 30 fueling station component of the project, causing vehicles entering the site or waiting to fuel to stack up into travel lanes. While there is a secondary access point to the project site on Brace Road, it will be restricted to right-in and right-out turn movements, and does not meet the needs for multiple entry points Rocklin has advocated for and most Costco stores typically have.</p>	<p>and the Town took the extraordinary step of recirculating the Draft EIR in order to include additional site access options based on requests from the City of Rocklin and other parties. This allowed even greater consideration of site access options so that the most appropriate option can be exercised by the Town for this project. It is inaccurate to suggest that only the City of Rocklin maintains Sierra College Boulevard. The Town of Loomis CIP project, in addition to the frontage improvements proposed by the project, would result in extensive improvements to Sierra College Boulevard, many of which would address existing traffic problems resulting from commercial development in the City of Rocklin.</p> <p>The project proposes a signalized access at Sierra College Boulevard, a right-in/right-out access at Brace Road, and proposes a third access to Granite Drive, should the City of Rocklin and the property owner grant access (see Condition of Approval #19) in the future. If the City of Rocklin is now advocating for multiple access points, it would be reasonable for the City to approve access at Granite Drive, as the City had previously requested in their letter to the Town dated September 10, 2018, and which was fully analyzed in the RDEIR.</p>				

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		<p>Each Costco store's access differs based on various site factors. While some Costco locations have more driveways, others, such as the Citrus Heights store, have only two access points. The two driveways serving the Citrus Heights Costco also serve other adjacent commercial, including a Walmart, a restaurant, and future retail. The Draft and Final EIRs demonstrate in detail how the proposed site access would operate, demonstrating clearly that this would not create the issues referenced by the commenter.</p>				
	<p>The design would cause frequent gridlock in the Sierra College Blvd. and I-80 area, damage the livelihood of existing and future business in the commercial corridor, severely restrain further development on adjacent Rocklin properties, and curtail prompt access by emergency services.</p>	<p>There is no substantial evidence provided to suggest this is an accurate statement. There is no unidentified queuing impact on the I-80 westbound off-ramp to address, nor has the commenter provided any substantial evidence of such an impact. The Loomis Costco Transportation Impact Analysis identifies queuing issues at the I-80/Sierra College Boulevard intersection and more specifically, long-term queuing on Sierra College Boulevard between the two interstate ramp terminals. The Draft EIR identifies potentially feasible and effective mitigation, but conservatively concludes that impacts will be significant and unavoidable because the Town does not have control over the implementation of mitigation outside the Town's jurisdiction. This is</p>	X	Old		

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		<p>disclosed in the Findings and Statement of Overriding Considerations, in the 2019 RDEIR, and in the Final EIR. As noted in Response to Comment City of Rocklin-89, the impact can be feasibly mitigated to a less-than-significant level, but due to the jurisdictional limits, the Town is unable to guarantee implementation. It should be noted that Caltrans has indicated that concerns over I-80 queuing have been thoroughly addressed through the EIR analysis and the MOU between Loomis and Caltrans.</p> <p>Representatives of the Harmon property have indicated that there is no concern that the placement of the project's access point could curtail development of their property. If future development within Rocklin results in significant transportation impacts on Sierra College Boulevard or I-80, the City and those applicants would be responsible for mitigating those impacts, as would projects in other jurisdictions along those corridors.</p>				
	<p>The traffic impact study continues to be fundamentally flawed, including flaws in vehicle miles traveled (VMT) estimations, which undermine the accuracy of impact analyses for air</p>	<p>As noted in the 2019 RDEIR, the VMT estimate for the project is based on project-specific and location-specific data, and was designed to provide conservative results (that would tend to overestimate impacts). The analysis is consistent with guidance provided by the Governor's Office of Planning and Research (OPR), including the focus on a net change in</p>	X	Old		

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	quality, greenhouse gas emissions and noise.	<p>VMT for retail/commercial establishments. The VMT analysis incorporates data on the location of existing and future customers of both the existing Roseville Costco and the Loomis Costco, and considers how the addition of the Loomis Costco will change trip-making behavior. The conservative nature of the RDEIR VMT assessment has been confirmed, as detailed in a technical memo attached to the Final EIR. As noted in the Final EIR, the supplemental VMT methodology was prepared in consultation with, and per the guidance of the Placer County Air Pollution Control District, which subsequently accepted the analysis findings. The Town's documentation demonstrates that the VMT analysis prepared to support the 2019 RDEIR is conservative and would tend to overestimate actual impacts. Therefore, the analysis is conservative in relation to air quality, greenhouse gas emissions, and noise. As noted previously in response to this same comment, the traffic noise analysis is additionally conservative in that it focuses on potential trip generation of the proposed project, not VMT, and assumes all trips on affected roadways are new (when not all trips will actually be new).</p>				
	The project doesn't comply with Loomis general plan policies for carbon	The project provides more parking than is required by the Loomis Zoning Code.		Old	X	

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	monoxide modeling, land use amendments, and parking	<p>Under CEQA and the State Planning and Zoning Law, a project is considered consistent with an applicable plan if it is consistent with the overall intent of the plan and would not preclude the attainment of its primary goals. A project does not need to be in perfect conformity with each and every policy.</p> <p>As stated in Response to Comment Rocklin-34: For the purposes of CO impact analysis in the 2019 RDEIR, both the Town of Loomis General Plan Policy and the PCAPCD CEQA Guidelines methodology were considered. As the agency responsible for maintaining and achieving air quality standards within Placer County that is protective of human health, the PCAPCD-recommended screening criteria were selected as an appropriate threshold of significance to evaluate potential CO impacts in a manner that considers the protection of human health and meeting the requirements for selecting a threshold of significance defined in Section 15064 of the CEQA Guidelines. PCAPCD did not have any comment on the use of this approach or on the Town's General Plan policy. As noted previously in response to the same comment, dispersion modeling would not add any valuable information and has no relationship to any potentially significant effect associated with the proposed project. Therefore, the</p>				

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		project has addressed this policy through an Air District-approved methodology.				
	The FEIR's rejection of alternative sites analysis does not meet CEQA requirements.	There is no substantial evidence provided to suggest this is an accurate statement. Analysis of the alternatives is provided in the RDEIR Chapter 6 and in the FEIR.	X	Old		
	The FEIR fails to consider, let alone evaluate, reasonably foreseeable impacts on public safety that will result from the project.	There is no substantial evidence provided to suggest this is an accurate statement. The RDEIR evaluates public safety in various locations, including, but not limited to the traffic, noise, air quality, greenhouse gas emissions, and hazards sections. Responses to comments regarding safety and unsafe conditions that would result from moving the driveway north of the proposed location are provided in the FEIR (see the Responses to Comments City of Rocklin-23 and -90).	X	Old		
	Rocklin supports regional partners in smart development and understands Loomis' desire for anchor retail tenants. However, Rocklin must ensure that projects with potentially significant and widespread local impacts are planned meticulously and include realistic projections and solutions	The Costco project's impacts and mitigation measures that reduce those impacts to a less-than-significant level are provided in the 2019 RDEIR and Final EIR, and a discussion of impacts that are determined to be significant and unavoidable is provided in Staff Report Attachment 1 Findings and Statement of Overriding Considerations. In addition, the Town is proposing improvements on Sierra College Boulevard through the Town's CIP to address existing traffic issues that have been caused by existing commercial development in	X	Old		



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	<p>to those impacts. Protecting the wise investments in public infrastructure made by Rocklin residents and businesses to develop current and future capacity near Sierra College Blvd. and I-80 is the City's top priority.</p>	<p>Rocklin. Furthermore, in the proposed MOU the Town provided to Rocklin in the fall of 2019, the Town had agreed to pay Rocklin a fair-share of the costs paid by Rocklin toward construction of the Sierra College Boulevard interchange, in the same manner as businesses located in Rocklin CFD-11. As of the August 4, 2020 Town Council meeting, the City of Rocklin has not acknowledged the MOU provided by the Town. The MOU would address issues that, in response to comments on the Loomis Costco environmental documentation, the City claims are of concern.</p>				
<p>Abbott and Kindermann, Dan Cucchi 8/4</p>	<p>Rocklin has a significant 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. The City of Rocklin has commented throughout this process and, unfortunately, to date many of the issues raised have not been adequately addressed. This letter and its attachments disclose concerns with the Costco</p>	<p>The City's opinions are noted. Please refer to the following responses to the City's comments.</p>	<p>X</p>	<p>Old</p>	<p>X</p>	<p>X</p>

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	EIR, and inconsistencies with the Town's land use policies and regulations. We have also included additional comments prepared by Fehr & Peers regarding fundamental flaws in the traffic analyses and newly released VMT study.					
	The 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, GHG, and Noise. As a result, the EIR fails as an informational document.	This statement is not factually accurate. There are no such errors in the EIR. The commenter's prior comments have all been thoroughly addressed in the FEIR and Staff Report. See responses to July 7, 2020 letters from the City and Fehr & Peers in Attachment 7 to the Staff Report, FEIR Response to Comment City of Rocklin-58 through 64, and FEIR Response to Comment PCAPCD-2. The commenter provides no substantial evidence of any project impact not fully disclosed in the EIR. With respect to VMT, as addressed in detail in response to the same comments, the VMT analysis for the project actually represents a best practice. As noted in the 2019 RDEIR, the VMT estimate for the project is based on project-specific and location-specific data, and was designed to provide conservative results (that would tend to overestimate impacts). The analysis is consistent with guidance provided by the	X	Old		X

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		<p>Governor's Office of Planning and Research (OPR), including the focus on a net change in VMT for retail/commercial establishments. The VMT analysis includes data on the location of existing and future customers of both the existing Roseville Costco and the Loomis Costco, and considers how the addition of the Loomis Costco will change trip-making behavior. The conservative nature of the RDEIR VMT assessment has been confirmed, as detailed in a technical memo attached to the Final EIR. As noted in the Final EIR, the supplemental VMT methodology was prepared in consultation with, and per the guidance of the Placer County Air Pollution Control District, which subsequently accepted the analysis findings. The Town's documentation demonstrates that the VMT analysis prepared to support the 2019 RDEIR is conservative and would tend to overestimate actual impacts.</p>				
	<p>The City requests that the Town Council direct its staff to address the EIR and land use and zoning issues identified in this letter. The City continues to assert its previous February 6, 2020 and July 7, 2020 comments have not been adequately addressed. The following</p>	<p>See prior responses in this Supplemental Attachment.</p>	X	Old		X

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	<p>comments are intended to provide additional clarification of these issues in light of the response to City comments that was prepared for the August 4, 2020, Town Council Staff Report, Attachment 7, pp. 63-101.</p>					
	<p>Significant Traffic and VMT analytical errors Deprive the public of a meaningful opportunity to comment on the significant impacts of the Project, as well as its inconsistency with the Town's General Plan level of service policy.</p>	<p>The commenter's opinion is not supported by substantial evidence. See the above and below responses for specifics.</p>		Old		
	<p>The Town's General Plan policy requires Level of Service C, except where specified conditions can be shown. A fundamentally flawed traffic analysis does not provide substantial evidence of LOS C operations or the necessary conditions required by the Town's General Plan to provide for</p>	<p>The commenter's criticism of the traffic analysis has been addressed in the Final EIR and Staff Report. The commenter has provided no substantial evidence to support the conclusions. As set forth in the EIR and Staff Report, the project is consistent with the General Plan. The EIR's conclusions regarding LOS are supported by an extensive traffic analysis prepared by experts and independently reviewed and approved by the Town. Caltrans also reviewed and concurred with the traffic analysis.</p>		Old		

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	<p>an exception. Thus, the general plan LOS Policy consistency finding for the Conditional Use Permit is unsupported by substantial evidence.</p> <p>The Town's response asserts that "the Costco pass by rates were based on actual collected data," but no one but the Town's consultants have been provided an opportunity to review that "actual collected data." The data needs to be disclosed and the Town's staff and consultants have steadfastly refused. The Town must disclose the data per the Town's obligations under CEQA. A review of other recent Costco project EIRs show that Costco has previously disclosed this kind of data. The response also attempts to backstop its questionable assumptions by pointing to the ITE</p>	<p>The ITE Manual includes standard trip rates and pass-by rates for Discount Club stores, but allows the use of empirical data where it would be more representative. In this case, the traffic analysis uses empirical data collected by Kittelson, a traffic expert with extensive Costco experience. The Town and its experts independently reviewed and approved this information. The commenter speculates that the trip rates may not be correct, but fails to explain why these rates are not appropriate or provide any evidence to the contrary. The commenter requests additional data, but this data is not necessary for the public to review, assess, and understand the traffic analysis. The EIR includes substantial evidence to support the traffic analysis, including data points on the trip generation rate. Moreover, the data that the commenter cites from other Costco EIRs support the pass-by rate used in the Town's analysis (Redding is exactly the same; Ukiah, which from 2012, used a slightly higher rate). See Attachment 7-65 to the Staff Report.</p> <p>The commenter's criticism of Discount Club rates is not relevant, as the traffic analysis did not use these rates. See Attachment 7-69 to 7-70 to the Staff Report.</p>				

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	<p>Manual to conclude it is "more conservative". First, the very fact that Costco-specific data is used in the RDEIR is itself an admission that actual Costco operations are not reasonably reflected in the "Discount Club" category in the ITE Manual. Second, there are many examples of other Costco EIRs that also avoid using the "Discount Club" category from the ITE, because the data represents substantial evidence demonstrating that the ITE Manual does not reasonably reflect the actual operating conditions of a Costco. Thus, the RDEIR must provide its own substantial evidence to support its assumptions. Furthermore, because the Town's staff and consultants have refused to disclose this data up to this late hour in the process, any last minute</p>	<p>Contrary to the comment, the traffic analysis assumed that Costco would generate the maximum number trips from opening. As set forth at Staff Report Attachment 7-70 and 7-71, Costco trips tend to start lower and increase to the maximum over time. Therefore, the analysis is conservative. The comment does not provide any substantial evidence that this analysis is incorrect.</p> <p>The growth rate was provided by Costco based on membership and trade area data. The Town finds it to be credible. The commenter speculates that it may not be accurate, but fails to provide any substantial evidence in support.</p>				

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	<p>disclosure would be improper, as it is significant new information and requires the RDEIR to be recirculated for public review and comment. It seems to argue that an "Existing + Project" analysis overstates the Project's impacts because over the long term the conditions will change. This position is inconsistent with common industry practice—preparation of an "Existing+Project" and a "Cumulative+Project" analysis—to reasonably assess the short-term and long-term effects that can be associated with a project. It is hard to justify a policy that would allow an agency to avoid addressing flaws in their "Existing+Project" analysis for the reason that the project may have a lesser impact in their</p>					

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	<p>“Cumulative+Project” analysis Both VMT analyses assume an 8.7 percent growth in total membership once the Loomis and Roseville sites are fully operational. This assumption is presented as fact without any underlying support or data to demonstrate that this is a reasonable assumption.</p>					
	<p>The Costco EIR does not consider a reasonable range of alternatives and improperly rejects Alternative 3. The City continues to argue that the Town failed to consider a Reduced Floor Space/Reduced Fueling Station alternative that would meet “most of the project objectives” and reduce environmental impacts as previously demonstrated in the City’s July 7, 2020, comment letter.</p>	<p>See Staff Report Attachment 7-77 and FEIR RTC Rocklin -45, -49, -50, and -51.</p> <p>The Town, which developed the objectives, considers the range of goods to be an appropriate gauge of uses. A Costco with fewer goods would represent a less desirable use. While the commenter seeks to parse the language to support the assertions, the meaning of the objective is clear. It would make no sense to interpret the term <i>uses</i> in the narrow sense that the commenter urges, as the Costco warehouse is itself a single use - a members discount club. The EIR did not consider a 150,000 square-foot warehouse as an alternative as it would not provide any environmental advantages over the 155,000 square-foot project. Alternative 3 would</p>		Old		



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	<p>The Town's response asserts that "logically, a smaller warehouse would have less room to provide goods and services and that some of those goods or services could not be provided in a smaller warehouse due to a lack of adequate space." First, the objective does not say "all goods and services that Costco provides elsewhere." It actually states "all uses and services that Costco provides to its members elsewhere." Thus, any reduction in the amount of any particular goods available for sale at the smaller warehouse is not relevant to measure whether the "uses and services that Costco provides elsewhere" can still be fully accommodated in a smaller store. Second, the conclusions do not logically</p>	<p>reduce member trips compared to the proposed project and therefore would have reduced traffic impacts compared to the proposed project, as indicated in Table 6-12 of the 2019 RDEIR. However, significant and unavoidable traffic impacts would remain under Alternative 3. As with the project, the EIR considered Alternative 3 to have significant and unavoidable traffic impacts because some of the mitigation measures are located in other jurisdictions, including the City of Rocklin. If these other jurisdictions implement the measures, traffic impact for both the project and Alternative 3 would be reduced to less than significant. The 2019 RDEIR also provides a detailed and quantified evaluation of other effects relative to the project related to aesthetics, air quality, biological resources, greenhouse gas emissions, noise, and energy. See pages 6-16 through 6-19.</p>				

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	<p>follow from the assertion. For instance, the Project is proposed as a 155,000 square foot warehouse retail facility, but what if it were only 150,000 square feet? This is certainly “smaller...[and] would have less room,” but that does not necessarily mean that it cannot still provide all the same uses and services as the 155,000 square foot version. Third, the Project’s CEQA finding that Alternative 3 is infeasible because it “would not avoid or reduce the unavoidable significant traffic impacts” (i) is unsupported by substantial evidence due to the flaws in its underlying assumptions as discussed above; and (ii) it contradicts the RDEIR’s analysis of Alternative 3 which concludes that it “would reduce member trips to the project site by</p>					

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	approximately 20% compared to the proposed project."					
	<p>The Project is inconsistent with fundamental General Plan policies and the Town's Zoning Code. The Response (pp. 85-86) misstates Policy 1.j which actually states that new development "shall" dedicate land for park and ride lots, not "should" do so. The Project is not in compliance with the policy because the only stated reason for concluding the location is "inappropriate" is "the project involves a proposed commercial development." This is not factually correct. Furthermore, the Response's assertion that it is not needed just because another location may also be located in the vicinity of the Project site makes unsupported assumptions that a second</p>	<p>The commenter fails to state that park-and-ride lots are only required where the location is appropriate. As set forth the Staff Report Attachment 7-85 to 7-86, the Town did not find the project site to be such an appropriate location.</p> <p>See Attachment 7-86 to the Staff Report and the FEIR Responses to Comments Auguscik- 3 and Mooney-34 related to zoning.</p>		Old		

Name/ Date	Comment	Response	EIR Topic	New/ Old Topic	GP/ Code Consistency	Opinion
	<p>location in the area is unnecessary.</p> <p>The Town asserts that the Project is consistent with the "RM" and "RH" residential zones on the Project site because "this portion would only be used for parking and access."</p> <p>The Town of Loomis Municipal Code, however, does not allow for any type of retail trade uses, let alone the type of retail activity proposed by the Project. The "parking and access" uses are indistinguishable from the proposed warehouse retail use and cannot be decoupled and treated separately.</p>					
	<p>As detailed above, the Costco EIR does not fully account for the significant flaws in the EIR. In addition to the CEQA considerations, the City of Rocklin has identified general plan, zoning and</p>	<p>See above responses. The Town is pleased at the statement of the City's commitment to work with the Town to address any remaining concerns. The intent of the Town's proposed MOU is to identify specific topics for consideration and commit to actions related to each of these topics. The MOU addresses specific issues that the City has indicated are</p>		Old		

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	<p>Project design errors that should be addressed prior to consideration of Project approval. The City of Rocklin is still 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.</p>	<p>of concern. The draft MOU was provided to the City for consideration in the fall of 2019, but, to date, the City has neither acknowledged nor responded to it.</p>				
	<p>Fehr &amp; Peers comments that the Project's trip generation estimates were based on an <i>undisclosed database of studies of other Costco stores</i>. The RDEIR and FEIR assert that the undisclosed data from these unidentified stores is applicable to the subject site, but offers no evidence in support of this claim. In addressing comments to this effect, the FEIR response simply stated</p>	<p>See above response to Abbott &amp; Kindermann.</p>		Old		

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	<p>that the "trip rates were higher than ITE estimates so the results were conservative." Not only was this response dismissive and misleading, it also simply ignored the City's request to disclose this underlying data so it could be subject to the public scrutiny that CEQA requires.</p>					
	<p>The Fehr &amp; Peers July 6, 2020 comment letter reiterated our many concerns with the assumed pass-by trip reductions claimed in the analysis that are based on the undisclosed database of studies from other Costco stores, which may or may not be applicable to the proposed site. Pass-by estimates are overstated given the considerable (22 mile) distance between the store location and the average Costco member residence (i.e., unlikely</p>	<p>See above response to Abbott &amp; Kindermann and responses to the July 7, 2020 letter in Attachment 7 to the Staff Report (erroneously referred to by the commenter as the July 6, 2020 letter -- there is not an additional July 6, 2020 letter). Further, the 22-mile distance is an <i>average</i>; some members live farther away, but many live closer to the project site. For example, at the August 4, 2020 Town Council meeting, Costco's representative testified that approximately one-third of the Town's residents are members, most of whom would presumably switch to shopping at the closer Loomis store after it opens.</p>		Old		

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	<p>Costco members would already be driving by the site). The RDEIR analysis and FEIR responses to comments did not establish to any degree the credibility of those estimates (which are beneficial to project-related corridor traffic operations and project-related decreases in VMT). Instead of disclosing the details of how the pass-by rates were established and then demonstrating how they are appropriate to use at the proposed site, the FEIR (see page 3-272) instead attempts to defend the estimates using irrelevant or non-applicable facts and information.</p>					
	<p>The applicant's study and its underlying data suggesting an 8.7 percent increase in total membership with both the Roseville and Loomis</p>	<p>See above response to Abbott &amp; Kindermann.</p>		<p>Old</p>		

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	Costco stores being open has also not been made available to the public.					
	As a result of the many unsubstantiated assumptions and technical shortcomings in the transportation impact analysis, the RDEIR fails to properly disclose many of the likely environmental impacts to the transportation system caused by the project. Because the data itself has not been provided to the public, there is no way to evaluate the reasonableness of these assumptions, or determine if they are truly supported.	See above response to Abbott & Kindermann and responses to July 7, 2020 letter in Attachment 7 to the Staff Report.		Old		
	Corridor Operations – by taking excessive reductions for pass-by traffic and not analyzing corridor operations using microsimulation, the project’s adverse effects on operations along Sierra	The commenter reiterates his prior comments. See responses to July 7, 2020 letter in Attachment 7 to the Staff Report. See also FEIR RTC Rocklin-71. In reality, the assumptions used to support the traffic analysis would tend to overestimate impacts, as detailed throughout the Draft EIR, Final EIR, and each of the Town’s responses to the late comments.		Old		



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	College Boulevard have been understated.					
	Project Access – The faulty operations analysis hides the many operational problems that the placement and lane configurations of the single signalized project driveway will cause.	The commenter reiterates prior comments. See responses to July 7, 2020 letter in Attachment 7 to the Staff Report. The statement is not factually accurate.		Old		
	Freeway Off-Ramp Queuing – The RDEIR does not disclose any freeway off-ramp queues that extend onto I-80, yet the FEIR states that “it is possible that queues could extend beyond the available storage length at the I-80 WB Ramps & Sierra College Boulevard.” Had proper analytical techniques been applied in the RDEIR, this conclusion would have certainly been reached, and a new significant impact would have been identified. The Town of Loomis staff report (Attachment 7, page	The commenter reiterates prior comments. See responses to July 7, 2020 letter in Attachment 7 to the Staff Report.		Old		

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	75) states that the "commenter appears to have misunderstood the FEIR response." The quote provided earlier in this bullet is taken directly from the FEIR response. It is difficult to understand how that quote could have been misinterpreted.					
	Vehicle Miles of Travel (VMT) – Fehr & Peers July 6, 2020 comment letter presents multiple, valid arguments that demonstrate that the project's effect on VMT has been underestimated. Consequently, VMT inputs into greenhouse gas emissions, air quality, and energy analyses are also incorrect, and consequently those analyses may also be incorrect. Despite the presence of this information, the Town of Loomis staff report (Attachment 7, page 64)	The commenter reiterates prior comments. See responses to July 7, 2020 letter in Attachment 7 to the Staff Report. The statements are not factually accurate and, as detailed in the Draft EIR, Final EIR, and responses to each set of late comments, the VMT analysis represents a best practice that is conservative and would tend to overestimate actual impacts. The length of the response is unrelated to the substance of the comment and is instead consistent with the approach taken through all analysis and documentation on this project: to fully disclose all available information related to the project in order to promote an informed discussion. The Town's responses are appropriate in order to reiterate factually accurate information related to the project, so that all parties are focused on the correct analysis and interpretations supported by substantial evidence.		Old		

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	states that the "comment does not provide any substantial evidence that contradicts the EIR's conclusions." We respectfully disagree with that conclusion, noting that the staff report response to this comment is eight pages in length, which suggests there was substance in the comment.					
	The continued lack of transparency in transportation impact analysis assumptions and methods has hindered the ability of interested parties to have a meaningful opportunity to comment on and evaluate the adverse effects and merits of the proposed project. Consequently, reviewers are left with many outstanding concerns.	See above responses to Abbott & Kindermann. While the Town of Loomis has worked in good faith to meet all of Rocklin's requests – analytical suggestions, meeting requests, mitigation requests, design changes, additional access options, and other requests – it is not possible to meet the terms of all requests due to safety, the need to optimize access and circulation, feasibility, and related reasons. The record shows extraordinary effort by the Town to cooperate with the City's evolving requests, and to fulfill many of these requests, including sharing modeling details. See the Final EIR Responses to Comments City of Rocklin-57, 66, 82, 83, and 143.				X
Donald Mooney, representing	The FEIR contains a flawed project description, resulting in	The median was always intended to maintain full access at Homewood. Full access at the western apartment complex driveway is an	X	Old		

Name/ Date	Comment	Response	EIR Topic	New/ Old Topic	GP/ Code Consistency	Opinion
Daljit Bains 8/4	misinformation. It is not stable as it applies to traffic and circulation with numerous changes to Brace Road. The most recent change modifies the median on Brace Road to allow left turns from Homewood and the apartments, but not Costco, potentially causing traffic safety issues such as cut through traffic at the apartments and Homewood. The project also fails to meet the driveway requirements of the Town's Development Manual. Site triangles would be obstructed by the soundwall and landscaping.	existing condition. There would be no traffic impact due to cars entering/exiting the apartment complex after project completion. See the FEIR Response to Comment Mooney-14 regarding driveway compliance with the Land Development Manual. Refer to the Brace Driveway Spacing Deviation Memo in Attachment 7 of the Staff Report. Landscaping is required to meet the Town's sight line requirements, and the soundwall can be located to both reduce noise and maintain traffic sight lines. Refer to the attached Response to August 3rd Smith Engineering Comments Memo. The driveway is required to conform to the Town's sight line requirements in the Code. There are no flaws in the Project Description, which provides options for site access to be responsive to requests from the public and public agencies for additional site access options.				
	The FEIR fails to address the Project's inconsistency with the Zoning Ordinances. The Response to Comments and Staff Report state that no zoning change is proposed for the parcels or portions of the	See Staff Report Attachment 7-86 and FEIR Responses to Comments Auguscik- 3 and Mooney-34. Please refer to Response to Comment Mooney-9 regarding zoning. The project does not include commercial parking as defined in the Code, which would be a paid parking lot. The Brace Road access includes a driveway, which is allowed in residential		Old		

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	<p>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 supported by the Town's Zoning Code. Nothing in the Code 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. No such findings have been or can 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.</p>	<p>zones, landscaped setbacks, which are also allowed, and a small number of parking spaces, which are also allowed. Features such as parking, landscaping, and driveways are not specific uses limited to one type of use or another, but accessory uses that are necessary to be provided for both residential and commercial uses, especially where (as here) the residential and commercial portions of the site are all under common ownership. The majority of the parking lot at the intersection of Brace Road and Sierra College Boulevard is on land zoned commercial. Design Review is provided in Staff Report Attachment 4.</p>				

Name/ Date	Comment	Response	EIR Topic	New/ Old Topic	GP/ Code Consistency	Opinion
	<p>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. 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. The EIR fails to adequately address why there are no feasible alternatives to the truck delivery site or that there are overriding</p>	<p>The Town will impose an enforceable condition of approval (Condition of Approval #50) requiring delivery trucks to use the main driveway on Sierra College Boulevard between the hours of 10 PM and 7 AM. The Town can take enforcement action upon any non-compliance with the time of day delivery requirements and any other condition imposed on the project.</p> <p>Costco dispatches its warehouse delivery fleet from the Costco Depot in Tracy, California and directs the warehouse delivery fleet in a manner that complies with the time of day and delivery route restrictions. Costco fuel delivery vehicles will use the signalized Sierra College Boulevard Project driveway to enter and exit the site and thus would have no impact on the Brace Road project site access.</p> <p>Alternative 2 was rejected because it would not meet basic project objectives. No additional alternative with a different layout and different delivery routes is warranted, as the current layout would not result in any significant impacts after mitigation. No change to the FEIR is necessary in response to this comment.</p>	X	Old		

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	<p>transportation and traffic management benefits to scheduling deliveries at night.</p> <p>While the Town attempts to 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.</p>					
	<p>Mitigation Measure Noise - 2 also provides that "The Tire Center doors shall be closed whenever pneumatic wrenches and tire breakers are used, to the maximum extent feasible." The reliance on a mitigation measure to be implemented only when feasible does not satisfy CEQA requirement that mitigations measures cannot be deferred. The mitigation measure is also not enforceable as it fails to state who determines feasibility. Is such a</p>	<p>As set forth in Staff Report Attachment 7-76, noise impacts from the Tire Center would be less than significant even with the doors open. Mitigation Measure Noise-2 is not illegally deferred mitigation and includes multiple actions that would be implemented. Tire center doors will be closed when it is feasible to do so, but this is not necessary to reduce operational noise impacts to less than significant. It would not be feasible to have the door closed when moving equipment or cars in or out of the doorway, but otherwise would be anticipated to be feasible. The analysis shows that the other components of that mitigation measure, such as the 8-foot soundwall and limits on the timing and use of noise-generating equipment in the vicinity of occupied residences, will reduce impacts to</p>	X	Old		

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	determination made by the City staff, Costco employees, Costco managers? Also, the mitigation measure must identify the criteria associated in determining the maximum extent feasible.	less than significant. As these measures will be implemented upon commencement of operations, there is no deferral of mitigation. In addition, Costco will use tools within the tire center that produce less noise than what were assumed in the EIR analysis and therefore, as with the balance of impact analysis throughout the EIR, the noise analysis is conservative and would tend to overestimate impacts. No further modification to the proposed Mitigation Measure Noise-2 is warranted.				
	<p>The Final EIR fails 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 meet the project objectives.</p> <p>The Final EIR fails to adequately consider an alternative that moves the footprint of the large Costco warehouse to a different location on the property that would allow for more effective access</p>	<p>See Staff Report Attachment 7-77 and FEIR Responses to Comments Rocklin -45, -49, -50, and -51.</p> <p>The EIR includes a reasonable range of alternatives. The alternative suggested by the commenter would not avoid or substantially lessen any significant project impact. The Town rejected the smaller Costco alternative as it would not meet the project objectives to the same extent as the project. The fact that Costco may have smaller warehouses elsewhere is not determinative of whether a smaller warehouse meets the project objectives developed for this project.</p> <p>The traffic analysis shows that smaller facilities require more frequent deliveries and add more traffic. Analysis of the alternatives is</p>		Old		



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	<p>from Sierra College Boulevard. This would eliminate the need for an access point on Brace Road, thus avoiding the noise impacts and traffic safety impact from delivery trucks on Brace Road.</p>	<p>provided in the RDEIR Chapter 6 and in the FEIR. See the Responses to Comments Mooney 45 and 47, and the Rocklin responses, particularly City of Rocklin-43 through 52.</p> <p>Moving the warehouse within the site to allow for more access points on Sierra College Boulevard does not result in improved access or a reduction in traffic impacts. Placing more driveways on Sierra College Boulevard would create other traffic impacts. Relocating the warehouse and fueling station can cause increased noise and air pollutant emissions impacts to residents in the vicinity of the project site. The Town's interest, instead, is identifying a proposed project that would <i>reduce</i> rather than <i>increase</i> potential impacts.</p>				
	<p>The driveway separation does not meet separation required by the Town Municipal Code nor the requirements of the Town's Land Development Manual. The rationale for not meeting these requirements is based upon improper assumptions and is not supported by substantial evidence. The July 22, 2020</p>	<p>See Staff Report Attachment 7-24 and 7-25 and the FEIR Response to Comment Mooney-14. Please also refer to the attached Response to August 3rd Smith Engineering Comments Memo.</p> <p>The fourth paragraph under Section 6-1 of the Land Development Manual addresses infill sites. The project site is located at an intersection, is adjacent to an apartment complex that the Costco site surrounds on three sides, is bounded by existing residences to the east, and a Chevron fueling station and</p>	X	Old		

Name/ Date	Comment	Response	EIR Topic	New/ Old Topic	GP/ Code Consistency	Opinion
	<p>Spacing Memo also relies upon an assumption that the Brace Road entrance to the Project will not have more than 400 vehicles a day. It is unclear if that is entering vehicles or exiting vehicles or a combination of entering/exiting vehicles. While the memo states that is based upon an estimate in the Traffic Impact Study, a review of the TIA does not reveal that assumption. Thus, the justification for the 50 feet spacing does not appear to be supported by substantial evidence.</p>	<p>McDonald's restaurant to the south. Within Loomis, the Costco site is located within and adjacent to developed land. Therefore, the Costco property is considered an infill site. Section 6-1 states:</p> <p><i>"The Town recognizes that infill projects (projects within older, previously developed areas) may have certain constraints such as lot size, existing driveways near the property line on adjacent parcels, etc. which may deem it impractical to achieve the requirements contained in this manual for site access. Infill projects such as these will be evaluated on a case-by-case basis by the Town. However, the goal will be to achieve the requirements contained herein to the extent practicable."</i></p> <p>Since the apartment driveways are located adjacent to the project site, their location makes it impractical for any future development of the property to locate driveways on Brace Road, while also achieving the requirements listed in Section 6-3 of the Land Development Manual. Therefore, the Town is able to evaluate the project individually pursuant to Section 6-1 to determine how best to achieve the requirements in the Land Development Manual to the extent practicable.</p>				

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		<p>Town engineers have reviewed the project and proposed driveway placement and conclude that an exception is appropriate for this project because (1) the proposed placement of the driveway is consistent with the Municipal Code and meets the Land Development Manual standards to the extent practicable, (2) the proposed placement of the driveway is consistent with NCHRP Report 348 driveway spacing recommendations, and (3) the placement of a right-in/right-out only Costco driveway near the apartment complex's western driveway would not result in substantial use conflict due to both driveways having low usage and different peak traffic times.</p> <p>Municipal Code Section 13.36.100.B states that driveways shall be located a minimum of 150 feet from the nearest intersection, measured from the centerline of the driveway to the centerline of the nearest travel lane of the intersecting street, while Section 13.36.100.C states that, where two or more driveways serve adjacent development, the centerline to the driveways shall be separated by a minimum of 50 feet. As measured by the Town engineer, the Costco western Brace Road driveway would be located 225 feet from the centerline of the nearest travel lane of</p>				

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		<p>Sierra College Boulevard, and 50 feet from the centerline of the apartment complex's western driveway.</p> <p>Since the Costco driveway would be over 150 feet from the Sierra College Boulevard/Brace Road intersection, and 50 feet from the apartment driveway, the proposed driveway location meets these standards of the Municipal Code, while most closely achieving the direction in the Land Development Manual. Since the spacing is consistent with the Municipal Code, since the project site is an infill site constrained by the placement of the apartment driveway 275 feet from the intersection of Sierra College Boulevard and Brace Road, measured from the centerline of the driveway to the centerline of the nearest travel lane at the intersection, and would not result in substantial traffic turning conflicts, the Town may reasonably conclude that the proposed Project right-in/right-out only driveway placement is consistent with the Town's Land Development Manual.</p> <p>The estimate that the Brace Road entrance to the Project will not have more than 400 vehicles a day contained in the July 22, 2020 Spacing Deviation Memo in Attachment 7 of the Staff Report was based on the daily project</p>				

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		trip generation and the trip assignment percentages provided in the project TIA, consistent with industry standard methodologies. The up to 400 daily vehicles using the Brace Road entrance to the project represents a combination of both entering and exiting vehicles.				
	The Project fails to comply with mandatory General Plan policies. As pointed out by the City of Rocklin, the Town cannot defer general plan compliance to another agency when the Natural Resource and Open Space Policy I.e. mandates that the Project failed to prepare a carbon monoxide (CO) modeling analysis. The Town also fails to comply with Land Use Policy F.5 that states "New commercial development shall preserve and integrate existing natural features (e.g. creeks, native trees, rock outcrops) and topography into existing landscaping." The Town's	<p>Under CEQA, a project is considered consistent with an applicable plan if it is consistent with the overall intent of the plan and would not preclude the attainment of its primary goals. A project does not need to be in perfect conformity with each and every policy. Consistency with applicable codes and the General Plan is provided in the 2019 RDEIR and the Final EIR.</p> <p>As stated in Response to Comment Rocklin-34: For the purposes of CO impact analysis in the 2019 RDEIR, both the Town of Loomis General Plan Policy and the PCAPCD CEQA Guidelines methodology were considered. As the agency responsible for achieving and maintaining air quality standards within Placer County that is protective of human health, the PCAPCD-recommended screening criteria were selected as an appropriate threshold of significance to evaluate potential CO impacts in a manner that considers the protection of human health and meeting the requirements for selecting a</p>		Old	X	

Name/ Date	Comment	Response	EIR Topic	New/ Old Topic	GP/ Code Consistency	Opinion
	addition of "where feasible" is not part of the General Plan policy.	<p>threshold of significance defined in Section 15064 of the CEQA Guidelines. Dispersion modeling would not add any valuable information and has no relationship to any potentially significant effect associated with the proposed project. Therefore, the project has addressed this policy through an Air District-approved methodology.</p> <p>Policy F.5 states, "New commercial development shall preserve and integrate existing natural features (e.g. creeks, native trees, rock outcrops) and topography into project <u>landscaping</u>." Note specifically this addresses landscaping, not the entire property. The project preserves native oaks and drainages within the landscaped setbacks around the perimeter of the site. The policy does not require that all native trees, rock outcrops, etc. be preserved on-site, as intimated in this comment.</p>				
	Nothing in the Final EIR or traffic study states whether the delivery trucks entering Brace Road will be subject to the weight limits. There is nothing in the General Plan regarding Brace Road nor on the weight limit sign	The purpose of the General Plan is not to identify the purpose of each sign in the Town. This comment suggests that trucks are not allowed to use Brace Road, which begs the question, why would the Town have signage regarding truck weights if the roadway excluded all delivery truck traffic? As the Town Engineer has indicated, the signage is meant to warn truck drivers of the weight limits	X	Old	X	

Name/ Date	Comment	Response	EIR Topic	New/ Old Topic	GP/ Code Consistency	Opinion
	indicating that such restrictions do not apply to the western portion of Brace Road. The Final EIR fails to discuss or explain this inconsistency.	associated with the bridge crossing at Secret Ravine so that they have enough time to turn around, if needed. Trucks serving the Homewood site use Brace Road. Therefore, there is nothing to suggest trucks may not use Brace Road, and no change to the FEIR is necessary.				
	The Final EIR fails to meet CEQA's procedural and substantive requirements, and fails as an informational document to the decision-makers and public. Additionally, the Project fails to comply with the Town's General Plan. Based upon the foregoing, the Town should not certify the Final EIR and deny the application.	The commenter's opinions are noted. Please refer to the previous responses to these comments.		Old		X
	The Spacing Memo attempts to create confusion as to what separation standards apply, if at all, to the Project's driveway locations. The memo mischaracterizes the Project as infill development, allowing	The commenter opines that the Spacing Deviation Memo is flawed and has opinions related to the conclusions therein, but provides no substantial evidence in support. As discussed above, the Town considers the project site to be an infill site. During final design, the Town's review will ensure the appropriate sight distances and traffic visibility are achieved. See prior responses regarding more access points on Sierra College		New		

Name/ Date	Comment	Response	EIR Topic	New/ Old Topic	GP/ Code Consistency	Opinion
	<p>Town Engineer discretion on spacing. While there is development to the east, and north, for which Costco has minor frontage, there is little development to the south or west. The only reason why the project does not propose more access points on Sierra College Boulevard is due to the placement of the warehouse and fueling station on the site.</p> <p>The Separation Memo attempts to exploit apparent discrepancies or inconsistencies in driveway separation requirements in Town Municipal Code and Town Land Development Manual to create confusion about what separation distances apply. The Spacing Memo then cites other sources in an attempt to justify spacing between the proposed Project driveway and the</p>	<p>Boulevard and distances between the driveway and the centerline of Sierra College Boulevard and the apartment driveway.</p> <p>Refer to the attached Response to August 3rd Smith Engineering Comments Memo. There was no attempt to create confusion. The Project is consistent with the Town Land Development Manual and Office of Planning and Research (OPR) definitions of infill development. The Land Development Manual states that infill projects will be evaluated on a case-by-case basis by Town engineers.</p> <p>The Project's Brace Road driveway meets the minimum acceptable spacing outlined in the Spacing Deviation Memo, and therefore meets the guidelines contained in the Land Development Manual. The spacing between the Project's driveway on Brace Road and the western Sierra Meadows Apartments driveway will be 50 feet, measured from centerline to centerline. See response to the next comment below regarding sight distances.</p>				



Name/ Date	Comment	Response	EIR Topic	New/ Old Topic	GP/ Code Consistency	Opinion
	<p>Brace - Sierra College Boulevard intersection, The Spacing Memo states at page 3 that the "centerline of the right-in right-out Project driveway on Brace Road would be located approximately 50 feet west of the centerline of the existing western Sierra Meadows Apartments driveway. However, the scale of the drawings presented in the Spacing Memo and the Improvements Memo indicates the separation between driveways is 48 feet or less.</p> <p>The realistic consideration for deciding the adequacy of this spacing is whether a driver emerging to make a right from the Project driveway and drivers simultaneously emerging to make a left from the Sierra Meadows driveway would have sight lines enabling them to be aware</p>					

Name/ Date	Comment	Response	EIR Topic	New/ Old Topic	GP/ Code Consistency	Opinion
	<p>of each other's presence and intent soon enough to avoid collisions. The sight distance diagrams in the Improvements Memo provide critical information in this matter but neither Memo discusses it in clear and objective terms.</p>					
	<p>The sight triangles depicted in the improvements memo are not clear as claimed. This Screenwall that would obstruct emerging driver's sight of one another extends all the way to the Brace Road street right of way limit not only on the Improvements Memo exhibits but also on RDEIR Project Description Site Plan at Figure 2-3, as well as all other versions of the site plan in the RDEIR and the FEIR. Moreover, the Project Landscape Plan at RDEIR Figure 2-8 at page 2-19 shows a row of Muscoge Crape Myrtle</p>	<p>The project is required to comply with the Town's site distance requirements. Final plans will be reviewed prior to issuance of a building permit for the project. This will ensure that lines of sight are adequate. See also Staff Report Attachment 7-34.</p> <p>Condition of Approval #68 states, "<i>Final landscaping shall ensure no trees or tall shrubs above 30 inches in height are within the traffic safety visibility area. Tree canopies in the traffic safety visibility area shall be trimmed to 8 feet in height.</i>"</p> <p>During final design, the Town's review will ensure the appropriate sight distances and traffic visibility are achieved. Project landscaping will be designed to not obstruct a driver's line of sight and the screenwall will be located and designed to both reduce noise and maintain traffic sight lines. Refer to the</p>		New		

Name/ Date	Comment	Response	EIR Topic	New/ Old Topic	GP/ Code Consistency	Opinion
	<p>planted on the Costco side of the wall where the sight lines pass through it. Muscogee Crape Myrtle is a shrub that grows to 25 feet in height and 20 feet in spread of canopy. So clearly the sight lines from the two driveways predicted in the Improvements Analysis would be obstructed by the wall and landscape.</p>	<p>attached Response to August 3rd Smith Engineering Comments Memo.</p>				
	<p>The Town should consider eliminating the Brace Driveway. Since all but a handful of deliveries are made when the warehouse store and fueling facility are closed to the public, and due to the conflict between sight distance and noise mitigation, the Brace Road access should be eliminated.</p>	<p>The commenter's opinion is noted. However, such a change to the project would not reduce or eliminate any significant project impacts and is therefore not warranted.</p> <p>The Brace Road driveway improves on-site circulation for daytime delivery trucks and employees, and reduces truck activity within the main driveway serving Costco members. The Town will confirm adequate sight distance as part of the normal building permit process. Refer to the Brace Driveway Improvements Memo in Staff Report Attachment 7, which indicates sight distance triangles which should be kept clear of obstructions. Please also refer to the attached Response to August 3rd Smith Engineering Comments Memo.</p>		New		

Name/ Date	Comment	Response	EIR Topic	New/ Old Topic	GP/ Code Consistency	Opinion
	An attachment of Smith's letter dated July 6, 2020 is attached.	See Staff Report Attachment 7 for responses to these comments.		Old		
Robert & Diane Auguscik 8/4	After 3 years we are back to a site plan that was abandoned after the first EIR. This should make it clear that a Costco warehouse does not belong around residential property. Brace Road and existing entrances cannot safely accommodate the amount of traffic that is being proposed. The Truck entrance on the apartments west side is too close to residential buildings and apartment access. It fails to meet the Town's own Land Development Manual standards. The EIR does not accurately reflect a LLA agreement made between Costco and the Augusciks. This project should not be allowed to move forward as proposed	<p>An EVA and future access at Granite Drive, should the City of Rocklin approve, were not proposed in the original site plan, and other changes to the project design have also occurred since the project was originally proposed, which are directly responsive to public and agency input.</p> <p>See the FEIR Response to Comment Mooney-14 regarding driveway compliance with the Land Development Manual and the Brace Driveway Spacing Deviation Memo in Attachment 7 of the Staff Report.</p> <p>The Town is not a party to the referenced agreement, which was entered into after the Notice of Preparation of the Project EIR had been circulated. The Town's Municipal Code requires that multiple, related entitlements are processed together, such as would be required for the proposed Loomis Costco and related lot line adjustment. CEQA also generally requires that related approvals are considered in a single environmental document. For this reason, it would have been inappropriate for the Town to abide by Mr. Auguscik's demands to approve the lot line</p>	X	Old		

Name/ Date	Comment	Response	EIR Topic	New/ Old Topic	GP/ Code Consistency	Opinion
		adjustment ahead of the EIR certification and other project approvals. See also the Final EIR Response to Comment Mooney-8				
	<p>The right in right out truck and customer entrance on the west side of the existing apartments is not safe and will not work. The right in right out restrictions on the Costco will force cars down Brace Road and create a turn around through the apartments parking lot, which is unsafe. I have been using the apartments west entrance for over 16 years sometimes 4-5 times a day. I would argue that this existing entrance is too close to Sierra College Blvd. Cars coming off of Sierra College quickly accelerate to well over the posted 25 MPH speed limit and give you very little time to make a decision to pull out. Cars traveling west on Brace road are also moving at a much</p>	<p>Please refer to the responses in this Supplement to Donald Mooney, which contains the Smith Engineering comments also attached to this commenter's letter. Please also refer to the Spacing Deviation Memo in Attachment 7 of the Staff Report and the attached Response to August 3rd Smith Engineering Comments Memo. The commenter's argument that vehicles might accelerate to speeds over 25 mph is not based on evidence, and also supports that vehicles turning from Sierra College Boulevard to eastbound Brace Road are traveling at a lower speed when the Costco driveway becomes visible, which is the speed on which stopping sight distance is based.</p> <p>This comment speculates that existing issues will be exacerbated by the Loomis Costco project, but provides no evidence in support of this speculation. Costco customers are members and will access the site in a pattern based on their travel direction. Customers will not take routes that are inconvenient, and making U-turns through other properties or traveling in the wrong direction to purposefully make a U-turn is illogical. See the</p>	X	Old		

Name/ Date	Comment	Response	EIR Topic	New/ Old Topic	GP/ Code Consistency	Opinion
	higher speed than posted limits. With the Homewood entrance awkwardly offset from the apartment entrance, adding a Costco entrance next to our west entrance makes no sense, and it should be relocated. (see attached comments from Smith Engineering)	FEIR Responses to Comments Benson 1-2 and 1-3, and Citizens Object-2.				
	The site line triangles that are being used in the memo do not consider cars parked on Brace Road. If the street parking is eliminated it will significantly impair the apartments ability to operate as an apartment complex. In 1962 the Town or County must have considered the availability of street parking in their approval process, if the Costco project leads to the elimination of parking on Brace Road replacement parking has to be developed. The Sierra	<p>The Town was not incorporated until 1984. The apartment complex has been operating outside of the Code requirements for decades and has not addressed the issue by providing additional on-site parking. Supporting evidence was not provided by the commenter regarding how Costco using its property as allowed by the Town Code would create any parking issue for the apartment.</p> <p>Exhibit 1 below illustrates the segment of Brace Road between Sierra College Boulevard and Hunters Drive and identifies the unpaved and paved areas along the south side of the roadway where vehicles may park currently.</p> <p>The use of Brace Road for on-street parking by Sierra Meadows Apartment residents does not represent a property entitlement, nor is on-</p>		Old		

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	<p>Meadows Apartments consist of 28, 2-bedroom units housing approximately 80 residents. The apartments have a total of 30 on-site parking spaces including the 6 on Starlight lane. The apartments rely heavily on street parking on Brace Road. The current Loomis Municipal code requires 2 parking spaces per apartment as well as one guest parking space per 3 apartments, for a total of 65.3 parking spaces that would be required to build the apartments today.</p>	<p>street parking provided on Brace Road for the exclusive use of Sierra Meadows Apartment residents. The paved area along the Sierra Meadows Apartment site frontage is used by apartment residents for parking and would remain available for on-street parking upon completion and occupancy of the proposed project (accommodating approximately 14 vehicles assuming 25 feet of curbside space is needed per vehicle). The current unpaved areas west of the apartment site (along the proposed project site frontage) that are used for undesignated on-the-shoulder parking will be constructed to the Town's current roadway design standards, including provision of curb and sidewalk and would no longer accommodate on-street parking (representing the loss of approximately 7 unpaved/unmarked parking spaces, assuming 25 feet per vehicle). Additional on-street parking is available east of Sierra Meadows Apartments extending to Hunters Drive, as shown in Exhibit 1. This area will remain available for on-street parking upon development of the proposed project, except for the area where the gated emergency access to the project site is provided (the new access will likely result in approximately 3 fewer on-street parking spaces, assuming 25 feet per vehicle).</p>				

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		<p>FEIR Response to Comment Nakashoji-2-5 identifies the ultimate cross-section improvements on Brace Road per the Town's General Plan, Figure 6 (page IV-33). As shown, the Town is planning for future improvements that include 5-foot bike lanes, 5-foot sidewalks, and 12-foot travel lanes (34-foot curb-to-curb paved width, refer to General Plan Figure 8E). While no on-street parking is included in the future roadway section; the segment of Brace Road fronting Sierra Meadows Apartments will maintain on-street parking on the south side of the street upon completion of the proposed project.</p> <p>There will be no parking allowed on the south side of Brace Road between Sierra College Boulevard and the project right-in right-out driveway. Therefore, no parked cars would be located within the sight triangle to the west of the project driveway. Parking will continue to be allowed on the south side of Brace Road in front of the Sierra Meadows Apartments, however this is an existing condition, and because the project driveway is right-in right out, would not affect sight lines for vehicles exiting the project driveway to view conflicting traffic. The sight triangles for the western Sierra Meadows Apartments driveway shown</p>				



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		<p>in the Spacing Deviation Memo will be kept clear of any obstructions related to project improvements, but the project is not responsible for addressing potential existing conditions line of sight issues at existing non-project driveways.</p> <p>No change to the FEIR is necessary in response to this comment.</p>				

Name/ Date	Comment	Response	EIR Topic	New/ Old Topic	GP/ Code Consistency	Opinion
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Exhibit 1. On-Street Parking Along Brace Road



Aerial Image Source: Google Earth

	<p>The 13-foot sound wall does little to stop noise and nighttime headlights because it will have to be set back from Brace Road far enough for cars leaving Costco and cars leaving the apartments to see each other as well as the oncoming traffic on Brace Road. The EIR states that delivery trucks will be restricted from using the entrance next to the apartments during nighttime hours, this is not enforceable. The entrance is incompatible with existing residential uses on Brace Road and is being proposed as part of a commercial project on a parcel of land that is currently zoned residential. The Noise mitigation measures are not accurately depicted because the sound wall has to be set back from Brace Road. Thereby making it ineffective in blocking noise and lights.</p>	<p>Supporting evidence was not provided by the commenter. The RDEIR comprehensively addresses all noise sources, including truck noise, and the Final EIR includes updated analysis showing the benefits of restricting the location of nighttime deliveries and includes comprehensive responses to comments, including the same comments that were included in this reissued comment letter.</p> <p>With respect to the sound wall set back, this is factored into the noise analysis presented in the Draft EIR and the Final EIR – the analysis focuses on the maximum truck delivery noise adjacent to the apartments – the noise from trucks that would not be directly attenuated by the sound wall due to its set back from Brace Road would occur at a greater distance. The benefit of the sound wall would be essentially the same, so long as it is installed anywhere between the roadway and the apartments (assuming the ground level is the same). The sound wall will be installed consistent with the requirements of EIR mitigation. Please see the Final EIR Responses to Comments Auguscik-12, and Mooney-20, -21, -22, and -39.</p> <p>The apartments are set back from Brace Road and therefore, any reduction in wall length to allow for traffic sightline safety would not occur behind the apartment structures. There would still be a sound wall to protect windows from noise and light in the required locations.</p>				
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Name/ Date	Comment	Response	EIR Topic	New/ Old Topic	GP/ Code Consistency	Opinion
		<p>The proposed conditions of approval require the enforcement of the nighttime deliveries; failure to comply would be a violation of the terms of the Conditional Use Permit. Daytime truck noise would also be reduced by the sound wall and other noise measures in Mitigation Measure NOISE-2.</p>				
	<p>Lot Line Agreement with Costco and complaint Filed in Placer County Superior Court. The EIR does not accurately interpret the Lot Line Agreement between Costco and the Augusciks. On December 17<sup>th</sup> 2019 Before signing the LLA Application I requested a meeting with the Town to discuss how the LLA would be done. In our meeting I was reassured that the LLA was a simple, easy step that would take a month or so to complete at staff level approval. I was assured that a boundary line adjustment can be completed quickly with just the planning director's</p>	<p>The agreement between Costco and the Augusciks, was entered into after the Notice of Preparation of the Project EIR had been circulated. While simple lot line adjustments can be processed by the Planning Director, under certain circumstances, the lot line adjustment must be brought before the Town Council. Since the Town did not have all the circumstances surrounding the agreement between the Augusciks and Costco, as it is not a party to that agreement, the statements made at that meeting were based on the limited information provided. When the application was submitted, Town review found that required information was missing and that the nature of the lot line adjustment was not simple, since it involved parcels that had been previously combined as well as potential Town right-of-way. More information was needed regarding usage of Starlight Lane and the title history of that portion of the property, as well as the parcels that had been combined</p>		Old		

Name/ Date	Comment	Response	EIR Topic	New/ Old Topic	GP/ Code Consistency	Opinion
	<p>approval. I left the meeting feeling satisfied the LLA would be done as a standalone application outside the project. Based on the meeting I signed the application and sent it back to Costco. Town representatives were not truthful with me, and deceived me into thinking that they would process a lot line adjustment independent of the project. After many months of the Town and Costco not doing the LLA and the town telling me they did not have a complete application from Costco I called Mike Dobrota at Costco and left him a voicemail saying I would take legal action against Costco. I received a voicemail back saying that Costco had done everything they needed to do for the town to process the LLA. I was told that I</p>	<p>prior to the Subdivision Map Act. That title history, along with the certificate of compliance were necessary to process the lot line adjustment due to the number of County-identified APNs involved. The Town was forthcoming through this process, and requested additional data, as needed, so that the correct action and processing could legally occur.</p> <p>Granting discretionary approvals relating to the Costco and adjacent properties prior to EIR certification could constitute impermissible piecemealing under CEQA, and for that reason it would not be appropriate for the Town to have conceded to Mr. Auguscik's demands to approve the lot line adjustment ahead of the EIR certification and other project approvals. See also the Final EIR Response to Comment Mooney-8.</p>				

Name/ Date	Comment	Response	EIR Topic	New/ Old Topic	GP/ Code Consistency	Opinion
	<p>should save my money suing Costco and instead look at suing the Town. (Voicemail file available upon request) I am starting to believe him. The Town's lack of transparency and disregard for the existing apartments and other residence is the reason that I can no longer support this project.</p>					
	<p>The final EIR for the proposed Costco Warehouse has not sufficiently addressed the impacts on the adjacent residential properties; does not accurately interpret a LLA agreement; makes questionable assumptions on use of residential parcels for a commercial truck entrance and emergency entrance as well as placing an entrance within 48 feet of residential buildings; and alienates a small apartment community</p>	<p>The commenter's opinions are noted. Please refer to the detailed responses above, as well as the responses provided in the FEIR and Attachment 7 of the Staff Report. Please also refer to the attached Response to August 3rd Smith Engineering Comments Memo.</p>		Old		X

Name/ Date	Comment	Response	EIR Topic	New/ Old Topic	GP/ Code Consistency	Opinion
	<p>from its neighbors by surrounding it on all four sides with commercial property. We ask the Loomis Town Council to reject the final EIR. If the Costco project is allowed to move forward without addressing these issues, it will have devastating operational and economic consequences on the apartments and the Auguscik family.</p>					
<p>Daljit Bains 8/4</p>	<p>Please be open in the conversation today and answer questions when asked. Please ask the Council to spend some time before the meeting to review comments and address questions if asked. Please ask Michael Okuma to answer the following question: What infrastructure changes were made after they added fuel to the Costco. Please disclose at the Town Council meeting. And</p>	<p>The Town Council has been provided copies of the written comments submitted. The Loomis Costco plans the fueling station with the warehouse, unlike Roseville where the fueling station was added later. Queue management at the Loomis Costco is required by a condition of approval and described in FEIR Response to Comment City of Rocklin-66. This response includes a graphic of how the queue management would operate.</p>				<p>X</p>

Name/ Date	Comment	Response	EIR Topic	New/ Old Topic	GP/ Code Consistency	Opinion
	please ask him to explain why they made those changes. And where would they make those changes at this site if necessary.					
	The Planning Commission was a one-sided meeting that did not address public questions or concerns. The Town Council must weigh all the issues prior to approval. It will look bad if they approve a project that is forced and doesn't meet CEQA guidelines.	The commenter's opinions are noted. The Town Council has been provided with written comments submitted to the Town prior to the meeting and will consider oral comments presented at the meeting.				X
	In December 2018, the Town considered a zoning change for the residential parcels on the site. The required zoning change violates SB 330.	Although a zoning change was considered since other amendments to the zoning code were proposed, the Town has determined that the zoning change was not necessary, because only parking spaces and drive aisles would be located within the portions of the parcels zoned RM-5 and RH. As provided on page 8 of the Staff Report, this does not prevent the Town from meeting the Regional Housing Needs Allocation. This is also discussed in the FEIR Response to Comment Auguscik-4.		Old	X	
	Brace Road is an arterial with poor pavement and difficult driving conditions. It has signs indicating truck	The truck weight sign is in reference to weight limits for the bridge further east on Brace Road, which is discussed in Final EIR Response to Comment Rocklin-138. No Costco trucks	X	Old		



Name/ Date	Comment	Response	EIR Topic	New/ Old Topic	GP/ Code Consistency	Opinion
	weight restrictions that would be exceeded by Costco trucks.	would travel on Brace Road beyond the Costco driveway, because this is not the planned truck route to the project. Since trucks making deliveries to Costco are Costco trucks, Costco can ensure that trucks are following the planned truck route. The EIR correctly indicates that Sierra College Boulevard is the truck route for the project.				
	APN 045-043-023 is zoned Residential Medium High Density and commercial truck access use is not allowed on this parcel.	See the Final EIR Responses to Comments Auguscik-3 and Mooney-9 and -34. The project does not include commercial parking, as defined in the Code, which would be a paid parking lot. The Brace Road access includes a driveway, which is allowed in residential zones, landscaped setbacks, which are also allowed, and a small number of parking spaces, which are also allowed. Features such as parking, landscaping, and driveways are not specific uses limited to one type of use or another, but accessory uses that are necessary to be provided for both residential and commercial uses, especially where (as here) the residential and commercial portions of the site are all under common ownership. The majority of the parking lot at the intersection of Brace Road and Sierra College Boulevard is on land zoned commercial. Design Review is provided in Staff Report Attachment 4.	X	Old	X	
	The traffic study does not analyze how many cars will	The July 22, 2020 Brace Road Spacing Deviation Memo estimated that the Brace	X	Old		

Name/ Date	Comment	Response	EIR Topic	New/ Old Topic	GP/ Code Consistency	Opinion
	<p>use the westerly Brace Road access driveway. With total daily traffic at 12,500 cars/day, it is unlikely that only 400 cars per day would use this access. The traffic study does not account for truck queuing into the site at this driveway.</p>	<p>Road project driveway will be used by up to 400 vehicles a day based on the daily project trip generation and the trip assignment percentages provided in the project traffic study, consistent with industry standard methodologies. Therefore, the data in the project traffic study indicates up to 400 vehicles per day would use the Brace Road driveway, and these trips would primarily consist of delivery and employee access. The commenter provides no evidence of higher use of this driveway.</p>				
	<p>The Brace Road driveway is inconsistent with the Land Development Manual, causing safety issues.</p>	<p>The distance between the Brace Road Project driveway and the Sierra Meadows Apartments driveway is 50 feet, as measured from centerline to centerline, consistent with Town Code. The City Engineer has reviewed and determined that there will be no significant operational or safety issues. The project is consistent with the Town Land Development Manual and Office of Planning and Research (OPR) definitions of infill development. The Land Development Manual states that infill projects will be evaluated on a case-by-case basis by Town engineers. The Project's Brace Road driveway meets the minimum acceptable spacing outlined in the July 22, 2020 Brace Road Driveway Spacing Deviation Memo, and therefore meets the guidelines contained in the Land Development Manual. See the Final</p>		Old	X	

Name/ Date	Comment	Response	EIR Topic	New/ Old Topic	GP/ Code Consistency	Opinion
		EIR Response to Comment Mooney-14 regarding driveway compliance with the Land Development Manual. Refer to the Brace Driveway Spacing Deviation Memo in Staff Report Attachment 7. Please also refer to the attached Response to August 3rd Smith Engineering Comments Memo.				
	A shortened median allows for left turns into the Costco driveway on Brace Road.	The shortened median is designed to allow full turning movements from Homewood and the apartments, while limiting Costco turning movements to right-in/right-out only. Since there is 50 feet of separation between the Costco driveway and apartment driveway, it is possible to design the median to limit only Costco turning movements.		New		
	Drivers on Brace Road accelerate quickly and combined with sight distance limits, cause unsafe conditions.	Sight distance would be maintained through appropriate design. The Town would review final site plans to ensure compliance with Town standards. The Conditions of Approval also require landscaping to be maintained per Town standards for sight distance.  Drivers turning onto Brace Road must slow down to turn. The commenter's argument that vehicles on Brace Road accelerate quickly is not based on any evidence, and also supports that vehicles turning from Sierra College Boulevard to eastbound Brace Road are traveling at a lower speed when the Costco driveway becomes visible, which is the speed	X	Old		

Name/ Date	Comment	Response	EIR Topic	New/ Old Topic	GP/ Code Consistency	Opinion
		that stopping sight distance should be based on. Refer to the Spacing Deviation Memo in Attachment 7 of the Staff Report and the attached Response to August 3rd Smith Engineering Comments Memo. With Costco movements limited to right turns only, the project would not significantly contribute to traffic hazards.				
	The Project does not meet the definition of infill.	The property is located adjacent to existing residential to the east, an apartment building and Homewood Lumber to the north, a McDonalds and gas station to the south, and is along a major arterial. With development on all sides, this is an infill site under the common understanding of that term, as well as definitions included in state law and other sources. The Project is consistent with the Town Land Development Manual and Office of Planning and Research (OPR) definitions of infill development. See the Final EIR Response to Comment Mooney-14. Please also refer to the attached Response to August 3rd Smith Engineering Comments Memo.	X	Old		
	Three driveways in close proximity on Brace Road causes safety hazards and violates the Land Development Manual	See the FEIR Response to Comment Mooney-14 regarding driveway compliance with the Land Development Manual and the Brace Driveway Spacing Deviation Memo.	X	Old		
	The merger of parcels and Certificate of Compliance	The Certificate of Compliance documents the merger of the parcels prior to the creation of		New	X	

Name/ Date	Comment	Response	EIR Topic	New/ Old Topic	GP/ Code Consistency	Opinion
	violates the Subdivision Map Act.	the Subdivision Map Act in 1974. Costco provided the necessary documentation showing the parcels were merged prior to the Subdivision Map Act, and therefore they are grandfathered as one lot. With the Certificate of Compliance, the number of parcels under consideration in the lot line adjustment application complies with the limits of the Map Act.				
	APN 045-042-011 and -12 and portions of APN 045-042-34 and -036 are zoned RM5, and APN 045-042-023 is zoned RH. These zones don't allow commercial parking.	See the Responses to Comments Auguscik-3 and Mooney-9 and 34. The project does not include commercial parking as defined in the Code, which would be a paid parking lot. The Brace Road access includes a driveway, which is allowed in residential zones, landscaped setbacks, which are also allowed, and a small number of parking spaces, which are also allowed. Features such as parking, landscaping, and driveways are not specific uses limited to one type of use or another, but accessory uses that are necessary to be provided for both residential and commercial uses, especially where (as here) the residential and commercial portions of the site are all under common ownership. The majority of the parking lot at the intersection of Brace Road and Sierra College Boulevard is on land zoned commercial. Design Review is provided in Staff Report Attachment 4.	X	Old	X	

Name/ Date	Comment	Response	EIR Topic	New/ Old Topic	GP/ Code Consistency	Opinion
	One entrance to Costco is not acceptable, causes significant safety issues and the traffic study and EIR fail to provide mitigation.	The commenter does not provide any substantial evidence to support the claims that the circulation plan is inadequate or unsafe. The project proposes more than one entrance. In addition to the signalized driveway on Sierra College Boulevard, a delivery/employee/public driveway on Brace Road is proposed. Furthermore, should the City of Rocklin approve of access to Granite Drive, the project is conditioned to provide such access. The Draft EIR and Final EIR, as well as the Town's detailed responses to each of the late comments detail the transportation operations associated with the project and there are no such significant safety issues, and all feasible mitigation is identified and imposed on the project.	X	Old		
	Comments provided previously to the Planning Commission.	Please refer to the responses to comments in the Staff Report Attachment 7.		Old		
Mimi & Adam Noorani 8/4	The current Costco proposal with public access and truck exits on Brace Road is unacceptable and unsafe. This proposed Brace Road entry and exit will create significant backups on Brace Road which was not designed for this type of traffic impact.	Apartment circulation is discussed in the FEIR Response to Comment Auguscik-11 and Mooney-14. The Town will ensure the median is sized to allow for current turning movements at the apartments and Homewood Lumber to continue (Condition of Approval 27M), and will retain the existing striping east of the proposed median. See the FEIR Responses to Comments Benson 1-2 and 1-3, and Citizens Object-2.		New		X

Name/ Date	Comment	Response	EIR Topic	New/ Old Topic	GP/ Code Consistency	Opinion
	It is likely that impatient drivers will bypass backed-up traffic by either driving around and into oncoming traffic, or use our property, occupied by Homewood, as an alternative shortcut route. This creates safety and liability concerns.					
	In addition, new traffic congestion along with added restrictions will impact the ability of Homewood delivery trucks to access Highway 80 and force lengthier routes through towns of Loomis and Rocklin.	The commenter does not provide any substantial evidence to support this claim. Delivery trucks serving Homewood would not be limited by the project. The project proposes mitigation to address traffic associated with Costco operations and the Town is proposing CIP improvements on Sierra College Boulevard to address existing traffic along the corridor.				X
	We strongly encourage the Town of Loomis to find better solutions to the traffic flow issues.	The commenter's opinions are noted.		Old		X
Comments received after 5 pm on August 4, 2020						
Daljit Bains 8/4	Does Brace Road have weight restrictions?	Brace Road has weight restrictions for vehicles crossing the bridge over Secret Ravine, approximately one-half mile west of the Costco property. There are no weight restrictions outside of the bridge crossing. As noted elsewhere, trucks making deliveries to Costco will not travel east on Brace Road past		Old		

Name/ Date	Comment	Response	EIR Topic	New/ Old Topic	GP/ Code Consistency	Opinion
		Costco and will not use the bridge over Secret Ravine.				
	Do you allow commercial parking and commercial truck entrances on residential property per your General Plan?	The General Plan Land Use Element identifies the different land use designations in Loomis, density and building intensity, and establishes goals, policies, and implementation measures. The General Plan does not list which uses are allowed or not allowed per land use designation. There are no policies that prohibit parking and circulation by land use designation.		Old		
	Is there a bus turnout on the property as was mentioned and recommended?	A bus stop or turnout is not necessary, as discussed in the FEIR Response to Comment Rocklin-128. While agencies, organizations, the public and stakeholders may provide comments and suggestions, CEQA does not require a project to implement every suggestion submitted, particularly when the suggestion does not resolve and is not related to any project impact.	X	Old		
	Why did the Town not change the zoning as was needed for this property?	The commenter incorrectly states that a zoning change is needed. The residential and commercial parcels used by the project are under common ownership. Furthermore, driveways are allowed on residential properties. The Code does not specifically list driveways as a use in any zone. However, driveways are merely a form of access, which is allowed in all zones. See the Final EIR Response to Comment Auguscik-3 and	X	Old	X	



Name/ Date	Comment	Response	EIR Topic	New/ Old Topic	GP/ Code Consistency	Opinion
		Mooney-9 and 34 and the responses to your comments made at the July 7 meeting on page 109 of Staff Report Attachment 7.				
	Has there been a Traffic Study completed by Kittleson & Associates that addresses how much traffic would come through and leave the newly proposed Costco access on the West side of the apartments? This can only handle 400 cars/day maximum per Wood Rogers. With daily traffic at over 12,000 cars per day there will be more than the maximum number of cars this access can handle. Wood Rogers mistakenly uses the estimated traffic from the TIA from the east side, which is an EVA.	The comment incorrectly assumes that the Brace Road driveway is incapable of serving more than 400 vehicles per day due to a design flaw and incorrectly asserts that more than 400 vehicles would use this driveway due to the total volume of vehicles accessing Costco on a daily basis. The Traffic Study addresses traffic that would use the Brace Road driveway. The July 22, 2020 Brace Road Spacing Deviation Memo estimated that the Brace Road project driveway will be used by up to 400 vehicles a day based on the daily project trip generation and the trip assignment percentages provided in the project traffic study, consistent with industry standard methodologies. Wood Rodgers indicated that the driveway is estimated to serve 400 vehicles per day, based on traffic patterns, membership, and employee and delivery trips, not that it is capable of serving only a maximum of 400 vehicles. The data is not based on the EVA, which would have no vehicle trips under typical conditions, and the commenter's opinion is unsubstantiated.		New		
	Do you allow a commercial emergency entrance/exit through residentially zoned	Emergency vehicle access (EVA) driveways are commonly provided within residential areas and are not subcategorized as a commercial		Old	X	

Name/ Date	Comment	Response	EIR Topic	New/ Old Topic	GP/ Code Consistency	Opinion
	property per your General Plan?	EVA or residential EVA. See the response to Robert Auguscik on page 6 of Staff Report Attachment 7.				
	How will you enforce the tire center noise? They don't close their doors at the Roseville Costco.	The Costco store manager would enforce operational rules and requirements. Since this is included in Mitigation Measure NOISE-2, it would be enforced by the Town as a project measure (see Attachment 1, MMRP). The actions or operational practices at one Costco do not represent the actions at all Costco stores as each site is unique. Closure of tire center doors has been observed at other Costco locations in the region.		Old		
	What type of pneumatic wrench and model number does Costco use?	Costco has identified newer equipment that produces reduced noise levels compared to previous types of equipment. Noise impacts from the tire center would be less than significant even without use of such equipment.		New		
	What are the weights of the truck deliveries?	Truck delivery weights vary by content; however, this data is irrelevant since there is no truck weight limit on the portion of Brace Road that would be used by Costco delivery trucks.		New		
	How will you enforce the truck entrance between 10 PM and 7 AM?	See the response to Mooney 7/7 on page 52 of Staff Report Attachment 7.		Old		
	How will you enforce the increased movements	The comment incorrectly asserts that there would be an increase in U-turning movement		Old		

Name/ Date	Comment	Response	EIR Topic	New/ Old Topic	GP/ Code Consistency	Opinion
	through Homewood Truss and the apartment complex?	through the apartments and Homewood. See the response to Mooney 7/7 on page 58 of Staff Report Attachment 7.				
	How will you enforce the westbound traffic on Brace Road from entering the Costco access on Brace Road?	The proposed median prevents left turning movement into Costco. Please see the response to this question above under your 8/4 comments.		New		
Daljit Bains 8/6	In order to clarify my comments that the site plan is the same from 2017 to 2020, I have attached the two site plans that are exactly the same. Please compare.	The two site plans submitted with the comment are clearly not the same. While the site plans show the Costco warehouse structure in the same location, there are a number of differences in the two plans. A few of these differences include reconfiguration of access on Brace Road and parking, movement of the fueling station 15 feet south, and addition of the EVA. There are also non-mapped changes, such as nighttime delivery routes, limits on site maintenance hours, and the potential for access to Granite Drive. Please read the original 2018 DEIR, and then compare that to the 2019 RDEIR and 2020 FEIR.		Old		X
Verbal comments received during the 8/4 Town Council Meeting						
Robert Auguscik	I'm trying to work with the Town and Costco, but the Town is only interested in tax revenues, not in neighbors. The Brace Road driveway pushes cars into	The Town is concerned about its residents and has asked for modification to, and that mitigation measures are implemented to address resident concerns. The Brace Road driveway would not push cars into the apartments to turn around, as members would	X	Old		X

Name/ Date	Comment	Response	EIR Topic	New/ Old Topic	GP/ Code Consistency	Opinion
	<p>the apartment entrance to turn around. My entrance is too close to Sierra College Boulevard, and cars speed at 35 MPH. Three driveways in one location is not right, and the sight distance doesn't take into account parking on Brace Road. The nighttime delivery route is not enforceable. The LLA is not accurately addressed in the EIR. Anders and Mary Beth said the LLA was simple and approved at a staff level, so I signed the application and sent it to Costco. The Town deceived me. I have no respect for the Town anymore.</p>	<p>not regularly choose routes that are relatively inconvenient. Driveway spacing was analyzed and meets Town standards, and adequate sight distance per the Land Development Manual. Nighttime deliveries are enforced by Costco. Drivers are employed by Costco and drivers are given a date and time and how to enter/exit the property. They would violate their job instructions if they did not follow the prescribed timing and routes. Furthermore, nighttime delivery routes are a project condition and are enforceable by both Costco and the Town.</p> <p>Refer to the Brace Driveway Spacing Deviation Memo in Attachment 7 of the Staff Report. Please also see the response to your 8/4 comments above, which address some of the same topics.</p> <p>With regard to the LLA, no application had been submitted at the time the commenter met with Town staff, and a general discussion of how simple lot line adjustments are processed occurred. The Town Staff informed Mr. Auguscik that once an application was submitted and determined to be complete, the Town would then conduct its evaluation and determine the process. Once the application was received, it became apparent</p>				

Name/ Date	Comment	Response	EIR Topic	New/ Old Topic	GP/ Code Consistency	Opinion
		to the Town that this was not a simple application, additional data was needed, and the process was more complex. Without having an application in hand to see what the lot line application proposed, it was impossible for Town staff to know just how simple or complex the process would be. The Town is obligated to conduct research and develop an understanding of the pertinent facts related to any entitlement request, and the process to approve such entitlements must reflect facts that are uncovered in response to any request for an entitlement. The Town has kept both the commenter and Costco apprised of the status of the application and has made requests for additional information through correspondence with both parties. There was no intention to deceive or purposefully lengthen the process to the detriment of the apartment owner. The Town is committed to the same high level of transparency and communication as exhibited throughout this process.				
Daljit Bains	It's the same site plan after all these years. It causes traffic and violates CEQA. Recent changes to Brace Rd allow full turning movement for Homewood and the apartments and	The commenter's statements regarding the site plan, turning movements on Brace Road, sight triangles, nighttime delivery enforcement, tire center closure, and alternatives all have responses in the responses to comments above in this Supplemental Attachment.	X	Old	X	X

Name/ Date	Comment	Response	EIR Topic	New/ Old Topic	GP/ Code Consistency	Opinion
	<p>this creates uncertainty as the project proceeds and safety issues. The Project violates the Land Development Manual. Sight triangles are inaccurate and show the landscaping and wall obstruct sight lines. The Brace Road access is not controlled and trucks will use the driveway at night. The tire center door closure can't be enforced and it defers mitigation. The FEIR doesn't consider alternatives that relocate the warehouse onsite to allow for better access on Sierra College Boulevard and eliminate the need for Brace driveway</p>					
Randy	<p>I am directly affected by traffic and noise. The need for more stores in the area is redundant. There are plenty of stores in the area. The difference between Roseville and Loomis is there is no</p>	<p>The commenter's statements are noted. Project impacts are disclosed in the EIR and the Findings and Statement of Overriding Considerations. The Draft and Final EIRs provide detailed information related to traffic and noise, along with feasible mitigation for all potentially significant effects. Although the Roseville Costco is surrounded by commercial</p>		Old		X

Name/ Date	Comment	Response	EIR Topic	New/ Old Topic	GP/ Code Consistency	Opinion
	residential on the periphery of the Roseville Costco.	uses, other Costco stores are located adjacent to residential uses, such as the Costco in Citrus Heights, Folsom, Elk Grove, San Marcos, Tustin, Bakersfield, Culver City, Westminster, Clovis, to name a few.				
Pat Brechtel (Spelling ?)	Rocklin holds a grudge against Loomis. We heard that Homewood would create tons of traffic and the traffic wasn't horrendous. The Town needs to work with Auguscik to work it out. Don't postpone Costco as costs go up and revenue goes down the longer we wait. Costco is a great addition. I support it 100%	The commenter's statements are noted.		New		X
Pam K.	I moved back to the apartments two years ago after having lived there 25 years ago. The apartments are kept nice and occupied by professionals. I support Costco, but I'm worried about noise, traffic, and parking.	The commenter's statements and concerns are noted. The Draft and Final EIRs provide detailed information related to traffic, noise, and parking, along with feasible mitigation for all potentially significant effects. Please refer to the mitigation measures in the DEIR and the MMRP (Staff Report Attachment 1). The project proposes measures to reduce noise and traffic to less-than-significant levels, when the proposed mitigation measures are implemented. The project would provide	X	Old		X

Name/ Date	Comment	Response	EIR Topic	New/ Old Topic	GP/ Code Consistency	Opinion
		slightly more parking spaces than required by the Town standards.				
Jeanine F., Sierra Meadows Apartment Manager	There is a safety issue at the west-side of the apartments. 90% of residents go in on Starlight and out at the west driveway. The parking lot isn't designed to handle this and kids play in the lot. Where will all the cars go? People turn around in the apartment parking lot. Several people sleep in the daytime and work at night and deserve quiet.	The commenter's statements and concerns are noted. Noise mitigation is proposed to reduce project noise levels. Implementation of Mitigation Measure NOISE-2 would reduce interior noise levels to approximately 45 decibels, as discussed during the August 4th Town Council hearing. Please refer to the EIR, which contains extensive discussion of noise, decibel levels, and sleep disruption. The Town is working with the Augusciks regarding existing access and circulation issues on the property. As stated in the responses above, traffic studies do not indicate significant turnaround movements would result from the project as this is slower and more inconvenient than using one of the three exit lanes at the project main driveway.	X	Old		X
Daniel Cucchi, City of Rocklin	Written comments on behalf of Rocklin were submitted. This is not a squabble. The City has an interest in Loomis's economic success because they share infrastructure. Costco generates traffic. The Town is convinced that Sierra College Boulevard will operate fine with	Please refer to the responses to the written comments above. As disclosed in the EIR, Costco would generate traffic; however, mitigation is also proposed to address this traffic, and the Town is implementing CIP improvements to address the existing traffic on Sierra College Boulevard that persist since the development of commercial uses in Rocklin. Although Rocklin is concerned about the single access on Sierra College Boulevard, the City has not explained the change in	X	Old		X



Name/ Date	Comment	Response	EIR Topic	New/ Old Topic	GP/ Code Consistency	Opinion
	mitigation, but Rocklin is concerned about this due to the single access point on Sierra College Boulevard which also adds a traffic signal within a short distance of other signals. Costco won't share their data (VMT). One conclusion is right and the other wrong and if Loomis is wrong, it means disaster on Sierra College Boulevard.	perspective regarding access to Granite Drive, which was previously requested by the City. The project has provided additional access, primarily for employees and daytime truck deliveries, from Brace Road, so there is not just a single point of access. Additionally, the project is conditioned to provide a connection to the south to connect with Granite Drive, subject to approval by the City of Rocklin. This would provide more access as these comments suggest is needed. The Town and Costco have shared a multitude of data with Rocklin, as well as recirculating the Draft EIR to identify additional site access options, in response to requests from the City of Rocklin and other parties.				
Michael Fortunato	You contacted Rocklin regarding Granite and they are unresponsive? Why won't Rocklin agree to Granite? It will mitigate a lot of issues – can anyone answer why this hasn't been agreed to?	The Town worked extensively with the City of Rocklin and the property owner (Petrovich) to identify and secure access to Granite Drive, which was proposed to the Town by Rocklin in a letter dated September 10, 2018. After the Town had made considerable effort to establish access, analyzed the impacts of this access in the RDEIR, and included the access in a Draft MOU submitted to Rocklin in October 2019, Rocklin indicated they no longer wished to have a connection to Costco from Granite Drive. Rocklin has not provided any information as to why they no longer wish to grant this access, when at one time, all the		New		

Name/ Date	Comment	Response	EIR Topic	New/ Old Topic	GP/ Code Consistency	Opinion
		parties (Loomis, Rocklin, Petrovich, and Costco) were proceeding with that effort. While Rocklin has not agreed to this access, a Condition of Approval for the project is to provide this access should Rocklin again change perspective on granting this access.				
Richard S., Resident of Sierra Meadows Apartments	Trucks give off many emissions, and the wall will trap the bad air. With people missing the entrance, they will turn into the apartments and make a U-turn through the neighborhood.	Please refer to the responses to previous comments regarding air quality and U-turns on pages 10 and 14 in Staff Report Attachment 7. A Health Risk Assessment was performed and found no significant impact. Updates to the HRA were provided as a part of the Final EIR to demonstrate reduced risk associated with limiting truck movements on the Brace Road access to daytime only.	X	Old		X
Adam Noorani, Homewood	We are worried about traffic and how it affects our operations. Homewood is the #1 tax revenue generator in Loomis. We are concerned the traffic study is inaccurate and traffic will impact Homewood operations and create congestion. Homewood operates commercial vehicles at Brace/Sierra College Boulevard and trucks need to get to I-80.	Please refer to the responses to the commenter's previous comments in Staff Report Attachment 7. The traffic study is accurate, has been independently reviewed, and has received concurrence from Caltrans, Placer County, and Placer County APCD.	X	Old		

Name/ Date	Comment	Response	EIR Topic	New/ Old Topic	GP/ Code Consistency	Opinion
	There will be queuing and congestion at the Sierra College Boulevard exit. We don't oppose Costco but oppose the traffic studies.					
Pam Blake	Michael Okuma didn't address the comments at the PC meeting. How many customers are in Loomis? Roseville Costco has huge traffic backups and no residences are near there. How does Costco only have 7% and Homewood have 93% of the traffic generation?	According to Costco' records, approximately 1/3 of the population in the Loomis area are members. While the Roseville Costco has traffic issues, the turning movements, site layout, and location, as shown in the presentation to the Town Council, affect traffic levels and would not be the same as the conditions at the Loomis location. Other Costco locations operate without significant traffic with two access points and within areas adjacent to residential uses. Other Costco locations adjacent to residential uses include stores in Citrus Heights, Elk Grove, and Clovis, to name a few. It should be noted that, although there are residential uses adjacent to the Loomis site, there are also a larger number of commercial uses adjacent to the site. The commenter's statement regarding assignment of percentages of traffic on Sierra College Boulevard is a misstatement of data previously provided. Studies indicate that Costco would result in 7% of the traffic on Sierra College Boulevard, but the remaining 93% would be generated by other uses, one of which is Homewood. Therefore, other commercial uses				

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		in the area, including, but not limited to Homewood, generate a large percent of the traffic that is not assignable to Costco.				
Diana Auguscik	Mike Dobrota, have you ever put a commercial warehouse right in a residential neighborhood with 30 foot 3 sided soundwalls? Thanks for working microphones at this meeting.	There are many Costco locations adjacent to existing residences, including those in Citrus Heights, Folsom, Elk Grove, Clovis, and various other locations. The sound wall to attenuate noise experienced at the apartments would be 13 feet in height and would be located on the west and a portion of the south sides of the apartments, rather than all 3 sides. Comments regarding the meeting microphones are noted.	X	Old		X
Richard Jackson	The Brace Road driveway puts commercial use on a residential road and that is against the law. I-80 traffic will cause CHP to come out to manage traffic. It will be worse with train traffic. There is a bridge and the dirt from their parking lot will affect dirt coming over the wall onto Hunter's Drive. My windows are washed 3 times a week now without Costco due to traffic on Brace. People will make U-turns in the neighborhood. Costco is too big for Loomis	It is not against the law for commercial trucks to use arterial roadways. Brace Road is a minor arterial, not a private residential road. There is no evidence to suggest Costco will result in calls to CHP. Delivery trucks would only use the western portion of Brace Road up to the Costco driveway and would not drive along the remainder of Brace Road. Costco schedules regular daytime cleaning of the parking lot to reduce dust. The privacy wall along the eastern side of the property would further prevent dust from affecting homes along Hunters Drive. As stated in previous comments, Costco members are unlikely to make U-turns in the neighborhood because it is inconvenient and slower, and no significant impact related to such actions would occur. Costco is member based, so members use the		Old		X

Name/ Date	Comment	Response	EIR Topic	New/ Old Topic	GP/ Code Consistency	Opinion
		same route over time and will not be confused over time				
Pat Bach	The issue is traffic. It is impossible to fit 12,000 cars on Sierra College Boulevard without a significant impact and mitigation is not going to work. This is a crisis of leadership. There are three gas stations nearby. If we just eliminate the fueling station, that will reduce traffic. The Town has not made an effort to compromise by eliminating the fuel station.	Significant efforts were made by the Town to compromise on the site layout or address concerns by neighbors and neighboring jurisdictions. Please refer to the FEIR Responses to Comments. The EIR analyzes alternatives that include no fueling station. See the Final EIR Responses to Comments Mooney-27, -38, and -47, and the Citizens Object letter.	X	Old		X
Ryan DeMartini, Loomis Basin Chamber of Commerce	The Loomis Basin Chamber of Commerce supports Costco. We request the Town and Costco work with us and the Historical Society on the Fruit Label artwork so that it is consistent with the walking mural tour. We hope Costco will draw successful retail into the downtown and act as a catalyst to downtown businesses. Tax	The Town has been coordinating with the Chamber of Commerce on this effort and will continue to do so in the future. The artwork is COA #64 and the Town is looking forward to working with Costco, the Chamber, and the Historical Society on this opportunity to further enhance the Town's art concepts.		Old		X

Name/ Date	Comment	Response	EIR Topic	New/ Old Topic	GP/ Code Consistency	Opinion
	revenues will make a huge difference.					

# **Attachment**

## **Response to Smith Engineering & Management Traffic Comments dated August 3, 2020**

### **Loomis Costco Project**



# Memorandum

**WOOD RODGERS**  
BUILDING RELATIONSHIPS ONE PROJECT AT A TIME

**To:** Brit Snipes  
Town Engineer  
Town of Loomis  
3665 Taylor Road  
Loomis, CA 95650

**From:** Mario Tambellini, PE, TE

**Date:** August 10, 2020

**Subject:** **Response to Smith Engineering & Management Traffic Comments dated August 3, 2020 – Loomis Costco Project**

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This memorandum has been prepared in response to technical traffic comments contained in the *Staff Report to Loomis Council August 4 Meeting Re Costco Project Memorandum* (Smith Engineering & Management, August 3, 2020) (Smith Engineering Memo). The comments were received by the Town of Loomis (Town) before the August 4, 2020 Loomis Town Council meeting regarding the Loomis Costco Project (Project). Traffic related comments from the Smith Engineering Memo have been summarized below, and responses have been provided.

**Summary of Comment:** The commenter states that the *Loomis Costco Brace Road Driveway Spacing Deviation Memorandum* (Spacing Memo) (Wood Rodgers, July 22, 2020) mischaracterizes the Project as an infill development.

**Response:** The Town of Loomis Land Development Manual (Land Development Manual) defines infill development as “projects within older, previously developed areas”. The California Governor’s Office of Planning and Research (OPR) defines infill development as “building within unused and underutilized lands within existing development patterns, typically but not exclusively in urban areas.” There are developed parcels adjacent to or across the street from the Project on all four sides of the Project site. The Project meets the Land Development Manual’s and OPR’s definitions of infill development.

**Summary of Comment:** The commenter states that the Spacing Memo “attempts to create confusion as to what separation standards apply, if at all, to the Project’s driveway locations.”

**Response:** The Spacing Memo describes all existing Town of Loomis roadway/driveway spacing standards and how they apply to the Project. This information is provided for the reader’s knowledge. There was no attempt to create confusion.

**Summary of Comment:** The commenter states that the Project’s Brace Road driveway “clearly fails to meet the Land Development Manual standard.”

**Response:** The Land Development Manual recognizes that infill projects may have certain constraints which make it impractical to achieve the same spacing requirements as greenfield development with no/less existing constraints. The Land Development Manual states that infill projects will be evaluated on a case-by-case basis by Town engineers. Town engineers evaluated the Project driveway spacing as documented in the Spacing Memo, and determined minimum acceptable spacing for the Project’s Brace Road driveway based



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on industry standard methodologies and guidelines. The Project's Brace Road driveway meets the minimum acceptable spacing outlined in the Spacing Memo, and therefore meets the guidelines contained in the Land Development Manual.

**Summary of Comment:** The commenter states that it would have been a reasonable assumption to require eastbound stopping sight distance for the posted speed limit of 35 miles per hour (mph) on Brace Road. The commenter states that motorists "might be quickly accelerating out of the turn to a speed at or above the 35 mile per hour limit."

**Response:** *A Policy on Geometric Design of Highways and Streets, 7<sup>th</sup> Edition* (AASHTO Green Book) (American Association of State Highway and Transportation Officials, November 2019) and the Caltrans Highway Design Manual 7<sup>th</sup> Edition (HDM) (Caltrans, July 1, 2020) require the use of design speeds or operating speeds (often the 85<sup>th</sup> percentile speed) to determine appropriate stopping sight distance. While the posted speed limit on a street will often be similar to the design or operating speeds, they will not always be the same. The spacing memo determined that the operating speed of vehicles traveling eastbound on Brace Road from the Sierra College Boulevard/Brace Road intersection would generally be 25 miles per hour (mph) or less. Therefore, the 25 mph speed used in the spacing memo was appropriate. The commenter's argument that vehicles might accelerate to a speed of 35 mph or greater is not based on evidence, and also supports that vehicles are traveling at a speed less than 35 mph when the Costco driveway becomes visible, which is the speed that stopping sight distance should be based on.

**Summary of Comment:** The commenter states that the scale of the drawings presented in the Spacing Memo indicate the separation between driveways is 48 feet or less.

**Response:** The spacing between the Project's driveway on Brace Road and the western Sierra Meadows Apartments driveway is required to be at least 50 feet, measured centerline to centerline, to comply with the Town's spacing requirements. Final Project plans will be reviewed by the Town prior to issuance of a building permit to ensure compliance with spacing requirements.

**Summary of Comment:** The commenter states that the Project screenwall and landscaping shown on the Project site plan would fall within the driveway sight triangles prepared as part of the Loomis Costco Brace Road Driveway Improvements Memorandum (Improvements Memo) (Wood Rodgers, July 22, 2020), and therefore would obstruct sight lines.

**Response:** The Project is required to comply with the Town's sight distance requirements, which include not placing objects that would obstruct a driver's line of sight in the sight distance triangles provided in the Improvements Memo. Final Project plans will be reviewed by the Town prior to issuance of a building permit to ensure compliance with sight distance requirements. Project landscaping will be designed to not obstruct a driver's line of sight and the screenwall will be located and designed to both reduce noise and maintain traffic sight lines.

**Summary of Comment:** The commenter states that the right turn only restriction on the Project driveway on Brace Road is likely to be enforced infrequently and intermittently.

**Response:** There is no evidence for the commenter's claim. The Town plans to install a raised median, or similar improvement, on Brace Road that would restrict the Project driveway on Brace Road to right-in right-out movements only. The raised median will block the possibility of turning left to/from the Project Driveway on Brace Road. The raised median on Brace Road will not restrict traffic movements at the Homewood Lumber driveway or western Sierra Meadows Apartments driveway (i.e. both driveways would remain full access). The raised median will be designed so that Homewood Lumber truck operations will not be impeded. A right turn only sign will also be installed at the Project driveway on Brace Road.