ABBOTT & KINDERMANN, INC.
ATTORNEYS AT LAW

July 25, 2018

Via Overnight Mail and E-mail

Town of Loomis
Attn: Robert King, Town Planner
3665 Taylor Road
Loomis, CA 95650
RKing@loomis.ca.gov

Re: Costco DEIR

Dear Mr. King:

This letter is submitted on behalf of the City of Rocklin. As the Town of Loomis is aware, the proposed Costco wholesale-to-public store (the "Project") is proposed on Rocklin's border. The Project will directly and adversely affect City of Rocklin residents, streets and nearby commercial enterprises (existing and potential) if not properly analyzed and mitigated. As documented below, the DEIR contains significant flaws in its assumptions, evaluation of impacts and mitigation requirements. The City of Rocklin has met with the Town of Loomis to address the City's concerns, however, because of the current lack of accurate information, there is no agreed upon strategy of how to proceed. The City of Rocklin remains committed to meeting and working with the Town of Loomis for the purpose of identifying and resolving those concerns. In the meantime, the City of Rocklin requests that the draft EIR and Project be revised to address the following matters.

I. Impact Modeling, Impact Analysis and Mitigation

Attached is a detailed analysis by Fehr & Peers regarding the evaluation of traffic impacts. (**Attachment A**.) As detailed in the attachment, the DEIR includes critical errors in the identification, evaluation and mitigation of impacts. City of Rocklin environmental staff has also reviewed the DEIR and have detailed their comments on **Attachment B**.

Rocklin's concerns over the sufficiency of the traffic analysis are well justified. The Project site plan is designed with essentially a single point of ingress/egress creating significant risks for traffic congestion on Sierra College Boulevard. It is noteworthy that none of the other Costco Stores in this region are similarly constrained. As demonstrated on **Attachment C**, the other Costco's enjoy multiple access points, long private driveways and/or local street access, as well as additional driveway length prior to encountering any fueling facilities, which offers

substantial vehicle capacity reducing the potential for congestion on adjacent arterials. The Project site plan lacks all of those features. Additionally as noted in **Attachment C**, the Project's signalized access would severely hinder access opportunities to the vacant 21.4-acre Harmon parcel located west of Sierra College Boulevard opposite the proposed project. The Project site plan (confirmed by review of aerial imagery) indicates that approximately 125 feet of vehicle storage would be available for a northbound left-turn lane at the signalized intersection into this retail parcel. The cumulative analysis contained in the Loomis Costco DEIR did not properly consider traffic generated by the Harmon parcel that would pass through this intersection.

In addition to the problems documented in **Attachments A, B and C**, the traffic analysis contains a serious methodological flaw. In Tables 3.7-21, 4-9, 4-16, 4-20 and 4-21, the EIR sets forth the anticipated traffic impacts in various scenarios assuming the implementation of various mitigation measures. Following each of these tables, the text explains that some of the selected measures are likely to be infeasible. However, the DEIR never discloses to the public and decision makers what the impacts are should the mitigation measures not be implemented. As drafted, the DEIR paints an unrealistic and overly optimistic picture of traffic related impacts, masking the operational impacts. Adoption of the DEIR as drafted would be an abuse of discretion. (Pub. Res. Code §21005(a); *Neighbors for Smart Rail v. Exposition Metro Line Construction Authority* (2013) 57 Cal.4th 439, 463 ["'A prejudicial abuse of discretion occurs if the failure to include relevant information precludes informed decisionmaking and informed public participation, thereby thwarting the statutory goals of the EIR process.' [Citations]."] The DEIR must be revised and recirculated to show probable impacts without "infeasible" mitigation.

II. Interjurisdictional Mitigation

The DEIR concludes that mitigation of certain transportation impacts is infeasible because the required improvement is outside of the Town of Loomis municipal limits or that right of way does not exist. (See Study Intersections 8 and 9 (DEIR pages 3.7-28, 3.7-31, 4-17, 4-23, 4-24, 4-26, and 4-28). The DEIR is ambiguous as to the grounds for the rejection and needs to be clarified. To the extent that right of way is a constraint, then the DEIR needs to set forth the factual basis to support the conclusion. If it is a matter of right of way acquisition, the City of Rocklin and presumably Caltrans have the capacity to assist in the acquisition should the agencies concur as to the need, extent of property to be acquired, and the nature of the improvement to be constructed. The DEIR needs to set forth a correct analysis and identify what efforts the lead agency has undertaken to secure mitigation options for mitigation measures involving Caltrans right of way or for property located within the City of Rocklin. If the mitigation is rejected due to anticipated costs, those costs need to be disclosed in the DEIR. A statement of infeasibility, without supporting information, is legally inadequate. (*Center for Biological Diversity v. County of San Bernardino* (2010) 185 Cal.App.4th 866, 883.)

Conversely, to the extent the DEIR relies upon future improvements as mitigation, the impacts of those improvements need to be studied. (See discussion under Section III below.)

Case law makes clear that consideration of impacts does not stop at jurisdictional boundaries and that interjurisdictional mitigation is a valid form of mitigation. The California Supreme Court has addressed this issue twice in *City of Marina v. Board of Trustees of California State University* (2006) 39 Cal.4th 341, and *City of San Diego v. Board of Trustees of California State University* (2015) 61 Cal.4th 945 wherein the court concluded that interjurisdictional mitigation was not foreclosed as a mitigation option. The City of Rocklin stands ready to meet with and negotiate with Loomis once a proper traffic study has been completed (See comments above re traffic study.) The City of Rocklin is disappointed that despite several meetings between respective staffs, Loomis has not required the type of traffic analysis previously recommended and not included language in the DEIR demonstrating the Town's commitment to facilitate meaningful mitigation for roadways and intersections in Rocklin directly affected by the Costco project. This is a clear departure from the approach taken by the City of Rocklin when the Rocklin Commons and Crossings projects were processed. See attached sample of mitigation language provided in the DEIR for the Rocklin Commons project and corresponding conditions in the Design Review entitlements for each in **Attachment D.** As another demonstration of feasibility, Rocklin and Loomis previously had a cooperative relationship with respect to the Sierra College Boulevard improvements. As reflected in the Rocklin/Loomis agreement included as **Attachment E**, Rocklin took the lead as the contracting party, and Loomis contributed funds to the undertaking. Intergovernmental cooperation as to the construction of Sierra College Boulevard in this situation is without question a form of feasible mitigation.

Moreover, Loomis has committed itself, as a matter of land use law, to mitigate for interjurisdictional impacts. "The Town shall assess fees on new development sufficient to cover the fair share portion of development's cumulative impacts on the local and regional transportation system." (2016 Circulation Element, p. C-31.) As provided for in the Town of Loomis General Plan, the use of the word "shall" creates a mandatory duty. (*Families Unafraid to Uphold Rural El Dorado County v. Board of Supervisors* (1998) 62 Cal.App.4th 1332, 1341.) The DEIR conclusions regarding interjurisdictional mitigation are wrong legally and inadvertently position the Town of Loomis to act in a manner clearly inconsistent with its own adopted policies.

III. Mitigation Measures

Tables 3.7-21, 4-9 and 4-16 include as a mitigation measure a second left hand northbound turn lane at the I-80 WB off-ramp. The DEIR discloses environmental benefits from that mitigation measure but to that end, the secondary impacts of intersection reconstruction has not been evaluated in the DEIR and is required to be disclosed. CEQA Guidelines

§15126.4(a)(1)(D). The same is true for the mitigation involving improvements to Sierra College Boulevard/Granite Drive.

The DEIR discloses significant unmitigated impacts in two circumstances. (See Study Intersections 8 and 9 (DEIR page 3.7-28, 3.7-31, 4-17, 4-23, 4-24, 4-26, and 4-28). This conclusion (the sufficiency of the analysis which the City of Rocklin does not accept as further detailed in this letter and **Attachments A-C**) does not extinguish the Town of Loomis's obligation to adopt all feasible mitigation (*Center for Biological Diversity v. Dept. of Fish & Wildlife* (2015) 62 Cal.4th 204, 231). Feasible mitigation would require all delivery truck traffic to and from Costco to use the Horseshoe Bar interchange. While this would not reduce impacts to a less than significant level, it is a feasible mechanism to reduce congestion at Project impacted intersections. The recent court decision in *County of Ventura v. City of Moorpark* (2018) 24 Cal.App.5th 377, 387-88, illustrates how such a restriction is valid as an exercise of local government powers.

IV. Failure to Analyze the Secondary Effect of Waiving Town of Loomis Capital Facility Fees

The DEIR includes a noteworthy admission that the Town of Loomis impact fee program is out of date. (DEIR 3.7-24.) This admission belies any assumption that the Town's impact fee program can be relied upon as a form of mitigation for offsite traffic impacts. Instead of addressing this problem, the DEIR takes the novel approach that the applicant can make certain transportation improvements as mitigation of the project impacts, and in exchange, the Town would waive its circulation fees. Effectively, this cannibalizes the Town's CIP program, meaning that there will be less money available to construct already programmed improvements in forthcoming years. This is a secondary impact of the Project and those impacts have to be studied in the DEIR. Such an analysis requires little speculation as the Town has a current CIP, and the anticipated lost revenue can be readily evaluated in the context of current CIP activities.

V. Vague or Internally Inconsistent Description of the Project

CEQA requires that the EIR contain a stable project description. The DEIR contains ambiguities or conflicts in data which directly relate to what the Project consists of. This in turn implicates the impact analysis. Specific examples are as follows:

A. Will the applicant improve Sierra College Boulevard to include three through lanes north in addition to turn pockets and deceleration lanes? The site plan in the DEIR is inconclusive on the street improvements that would be constructed along Sierra College Boulevard along the frontage and continuing north to Taylor Road.

B. Building Setback Data: Text on page 2-4 of the project description indicates that, "the warehouse building will be set back approximately 55 feet from Sierra College Boulevard", yet the dimension called out on Figure 2-3 "Site Plan" indicates that the building will be set back 75 feet 10 inches". Table 3.2-1 on page 3.2.28 in the DEIR also states 55 feet measured from the curb edge to the warehouse and includes 20 feet of landscaped parkway and a 30 foot wide driveway aisle. Figure 2-3 also shows a parking aisle with that area, so is the parking actually being provided or not in that location?

C. Brace Road Truck Entrance – Distance from Sierra College Boulevard:

D. Text in Section 2.3.3.3 on page 2-7 of the DEIR states that the entry drive off of Brace Road is 300 feet from the intersection of Brace Road and Sierra College Boulevard, however, using the bar scale on the Site Plan it appears that that feature may only actually be 180 +/- feet from the intersection. The difference in spacing could be significant in terms of analyzing the queuing of trucks entering the site. The discrepancy also begs the question of which distance was assumed in the Traffic Analysis? In addition, text in Section 2.3.3.3 in the project description indicates that the Brace Road Truck Entrance will be right in / right out only. However, nothing in the exhibits within the document addresses how that would functionally be achieved, particularly given that there is a full access driveway into the Homewood site to the north a short distance away. Any feature installed to ensure the right in /right out movement at the Costco truck access driveway on Brace Road would certainly interfere with or preclude full turn movements at the Homewood driveway, yet these issues are not discussed or illustrated anywhere in the document.

E. Retaining Wall Heights: Table 3.2-1 on page 3.2.28 in the DEIR also states that the proposed retaining wall along the Sierra College Boulevard frontage is 6 feet in height (p. 3.2-29) However, elevation points given on the grading exhibit (Figure 2-9) for top and bottom of wall show that it is up to 8.4 feet in height in some locations.

F. In section 2.3.3.3, the text notes that there are 777 parking places, but the plan notes 775. Which is correct?

VI. Cumulative Impact Analysis

As noted in the attachment from Fehr & Peers, the traffic and circulation analysis spends significant resources addressing capacity and turning movements on Sierra College Boulevard (both directions). Yet, in the Cumulative Long Term analysis, the DEIR does not discuss any

development assumptions for two significant vacant parcels in Rocklin (the Harmon parcel to the west with frontage on Sierra College Boulevard along with the Petrovich property located immediately to the south of the proposed Costco as reflected on **Attachment F.**) The cumulative traffic forecasts along Sierra College Boulevard show nominal growth in traffic on the east leg of Granite Drive, which would serve the Petrovich parcel. The west leg of the Project's signalized intersection includes minimal levels of traffic entering/exiting the Harmon parcel. This is not a good faith effort at reasonable disclosure. Both of these sites will contribute traffic to roadway volumes and turning movements, but neither site appears to be accounted for. The omitted parcels have been planned and zoned commercial for many years and their omission results in an inaccurate portrayal of long term cumulative conditions. The relevant test is whether or not "it was reasonable and practical to include [future development of these sites] and whether, without their inclusion, the severity and significance of the cumulative impacts were reflected adequately." (*Kings County Farm Bureau v. City of Hanford* (1990) 221 Cal.App.3d 692, 723.) The importance of traffic volumes and turning movements is well demonstrated by the existing traffic study. The omission exclusion of reasonably anticipated traffic from properties contiguous to the Project results in unrealistic projections of anticipated traffic impacts. It is both reasonable and practical to include reasonably foreseeable land uses in the traffic model for a more accurate disclosure of impacts.

VII. Alternatives

The EIR's alternatives analysis does not meet CEQA's requirements. The DEIR evaluates three other potential locations within the Town of Loomis. All come with obvious constraints such that the sites cannot be seriously considered as they are not "reasonable." None of the three sites is consistent with the Town's General Plan (see analysis 6.3.1-6.3.3). As to Offsite Opportunity sites 2 and 3, these are facially defective as neither is located near a functioning interchange, which directly pertains to two of the Town's objectives. These straw man alternatives were set up to fail from the outset. Thus, the adequacy of the EIR turns on what was actually studied. The studied alternatives included two no-project alternatives, along with the no fuel and small store format alternative. The DEIR's attempt to reject the no fuel and smaller store format alternatives is flawed as the DEIR applies the wrong metric when evaluating the alternatives, and makes material unsubstantiated assumptions, all of which are discussed below.

The DEIR also examined and rejected the no fueling station alternative and the smaller store alternative. The DEIR lacks substantial evidence and critical analysis to support the rejection of these alternatives. The DEIR sets forth ten applicant objectives and five Town objectives. The DEIR concludes that the no-fueling-station alternative "would not go as far toward meeting the project objectives when compared to the proposed project," relying upon two applicant objectives and one Town objective. This rejection is deficient on several points. First, the function of the alternatives analysis is to consider alternatives which "attain most of the basic

objectives" (Guidelines, § 15126.6(a)." Thus, the DEIR has applied the wrong metric in evaluating the alternatives.

By default, the DEIR effectively concludes that the no fueling station option meets 8 out of 10 applicant objectives and 4 out of 5 Town objectives. The DEIR's analysis does not support the conclusion that the alternative fails to attain the basic objectives and in fact, supports the opposite conclusion that this alternative does in fact achieve most of the basic objectives.

The applicant's objective to "Develop a Costco warehouse large enough to accommodate all uses and services that Costco provides to its members elsewhere" is remarkably vague. Nothing in the EIR supports the conclusion that fueling stations are a mandatory element of a Costco. In fact, Costco reports in its 2017 SEC filing that it operates 536 fueling stations.[1] Excluding Korea and France where Costco does not sell gas, there are 732 Costco stores operating at the end of 2017. In other words, 27% of Costco stores do not sell gasoline so petroleum is not a service that Costco provides to its members "elsewhere" in every location.

Without any supporting justification, the DEIR goes on to find a conflict with the objective to "Construct and operate a new Costco warehouse that serves the local community with goods and services not only from nationally known businesses, but also from regional and local businesses." There is no data in the EIR to support the implied finding that the Loomis community will fill the demand for a 24 or possibly 30 pump facility and in fact, the fueling station is a regional facility as suggested by DEIR itself. As reflected in the DEIR's Appendix G and H, the projected market demand for Costco goes well beyond Loomis and Rocklin, the "local community." Why would the regional demand for Costco goods and services change due to a Loomis location? There is no data that this Costco will provide goods and services from regional and local businesses and in fact, Costco makes no mention of local suppliers on its website and SEC filings. Additionally, fuel can hardly be characterized as an item sourced from "regional or local businesses." Thus, while fuel may be a desirable retail good from Costco's perspective, the evidence contradicts the conclusions that it is essential to Costco's operations, that it is necessary to serve the local community or that it is a locally sourced commodity. Not only does the DEIR apply the wrong metric in evaluating the alternatives, there is a lack of substantial evidence to support the conclusions contained in the DEIR.

The DEIR also considers and then rejects the smaller store alternative, concluding that this alternative would either not be met or only partially met the project objective: "Develop a Costco warehouse large enough to accommodate all uses and services that Costco provides to its members elsewhere." This analysis is devoid of any discussion of how the alternative fails to attain the basic objectives of the project and in fact, the DEIR expressly assumes that **all services**

[1] http://phx.corporate-ir.net/phoenix.zhtml?c=83830&p=irol-reportsannual accessed 7.02.2018.

would be available in the smaller store format.[2] There is no discussion of how a 124,315 square foot store would not be able to provide the same "uses and services" as other stores and as noted, is expressly contradicted by the underlying assumption for this alternative. Costco's own website states that the average store is 145k square feet, ranging from 73K to 205K square feet (**Attachment G**), clearly supporting the conclusion that Costco can and is willing to operate smaller format stores. Costco's own data undercuts any suggestion that there is a required minimum store size for Costco.

For the smaller store alternative, the DEIR also concludes, without any supporting documentation, that a smaller store format would result in increased traffic related noise to the existing apartments. Please set forth the evidence that supports this conclusion? The analysis of this alternative suggests a reduction in the loss of the oak trees. What evidence supports that conclusion?

As a final comment with respect to alternatives, the one alternative that the Town should have studied for an alternative location is the south side of I-80 at Horseshoe Bar Road. The parcels and common ownership is large, can more than accommodate the Costco project and still meet the planning vision for the Town of Loomis as identified in its General Plan. Unlike the other sites initially considered in Loomis, I-80/Horseshoe Bar south is a reasonable alternative location which should have been evaluated in the DEIR.

VIII. Public Safety

The City of Rocklin has a number of concerns relative to Public Safety Impacts that have not been acknowledged or addressed in the DEIR. In all likelihood the City of Rocklin Police Department will experience additional calls for service or requests to provide mutual response assistance to address items including but not limited to shoplifting, auto break-ins, vehicle theft, etc. Increased traffic and congestion in the Sierra College Boulevard corridor is also likely to result in similar calls for police, fire, emergency medical and ambulance responses to address an anticipated increase in traffic accidents, as well as, generate the need for enhanced traffic enforcement.

These increases in calls for service would normally be offset by development within the Rocklin City limits through increased revenue generated by property and/or sales tax, construction tax, or participation in applicable financing districts. However, due to the location of the Costco facility immediately adjacent to, but outside of Rocklin, those off-setting sources of revenue will not be forthcoming unless the Town of Loomis is willing to have conversations

[2] DEIR section 6.4.3 states as follows: "All activities planned for the proposed project would occur under Alternative 3 including sales of goods and services, optical exams and sales, photo center processing, hearing aid testing and sales, food service preparation and sales (including meat and baked goods), alcohol sales and tasting, tire center, and fuel sales."

with the City of Rocklin in that regard. Perhaps of even greater concern is the need for the project to properly mitigate traffic impacts as increased traffic congestion in the area will undoubtedly impact all public safety and emergency response times.

Such concerns need to be addressed in the Draft EIR so that a more informed analysis can be conducted and both the public and decision makers have a better understanding of the full range of impacts to Public Safety and Emergency Services created by the project, as well as, any associated mitigation proposals.

IX. Conclusion

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

Sincerely,

William W. Abbott

WWA/lh
Enclosures
cc: Client *(w/encls.)*

Attachment A

Attorney Client Confidential Communication

FEHR PEERS

July 23, 2018

Mr. Marc Mondell, Director
City of Rocklin ECD Department
3970 Rocklin Road
Rocklin, CA 95677

Subject **Review of Transportation Impact Analysis of *Loomis Costco Draft EIR* (2018)**

Dear Mr. Mondell:

Fehr & Peers has completed a review of the transportation impact analysis report for the *Loomis Costco Draft EIR* (2018). Our analysis focused both on Chapter 3.7 of the DEIR and Appendix E, which contained a traffic study prepared by Kittelson Associates.

We believe the transportation impact analysis is fundamentally flawed and needs to be updated to address the following five major technical shortcomings:

1. **Intersection Analysis Methodology** – the study relies on the use of the Synchro software program to analyze all study intersections. Synchro is not a micro-simulation model, and therefore does not take into consideration queues that spillback between traffic signals and other operational details (e.g., lane utilization, coordinated signal timing, etc.) that affect level of service (LOS) and delay. This is important given that the project proposes a new signalized intersection 750 feet south of the existing traffic signal at Brace Road and 600 feet north of the existing traffic signal at Granite Drive. The study should have utilized SimTraffic or another micro-simulation software program to analyze intersections along Sierra College Boulevard. This technical approach is supported by guidance contained in the *Highway Capacity Manual* (Transportation Research Board, 2017), which can be found in Appendix A. This recommended approach was conveyed to the Town during a scoping meeting with the City of Rocklin on October 2, 2017. As is discussed later in this letter, the reliance of Synchro paints an inaccurate and overly optimistic picture of traffic conditions within the Sierra College Boulevard corridor.

2. **Cumulative Roadway Network Assumptions** – the analysis assumes various transportation improvements are in place under cumulative conditions. While we have concerns with the reasonableness of assuming several of these improvements, this comment specifically focuses on the portion of Sierra College Boulevard between Granite Drive and Taylor Road given its proximity to the project and importance to overall corridor traffic operations. Below is some background information:

Current Roadway: Sierra College Boulevard between Granite Drive and Taylor Road consists of a four-lane divided arterial.

DEIR Cumulative Roadway Assumption: The DEIR assumes Sierra College Boulevard between Granite Drive and Taylor Road is widened to six lanes under cumulative (2035) conditions.

Reasons Supporting Why Sierra College Boulevard Widening Should Be a Responsibility of the Project:

A. The Town of Loomis is not a participant in programs such as the South Placer Regional Transportation Agency (SPRTA) that collects funds from new development to fund regional transportation projects such as the Sierra College Boulevard widening. SPRTA funds have already been expended to widen this segment from two to four lanes. Under the SPRTA program, additional widening to six lanes is assumed to be the responsibility of adjacent developers/property owners at the time of development. Refer to Appendix B for supporting details and the Placer County Transportation Planning Agency (PCTPA) website (http://pctpa.net/sprta-documents/) for additional information.

B. According to the Town of Loomis Resolution dated June 14, 2016, the Town's adopted *2016-2021 Capital Improvement Program* (CIP) contains approximately $4.2 million in scheduled roadway improvements. That document also identifies $82 million in unfunded circulation improvements from the Town's 2016 Circulation Element Update. The widening of Sierra College Boulevard between Taylor Road and Granite Drive is not listed within the 2016-2021 funded improvements in the Town of Loomis CIP (i.e., which is within the timeframe that Costco would be anticipated to open).

C. The DEIR does not indicate that Costco and/or the Town of Loomis will be responsible for widening Sierra College Boulevard to the ultimate configuration with three through lanes on the east (Costco) side of Sierra College Boulevard from Taylor Road to the transition near Granite Drive, yet this assumption was made under cumulative conditions. The parcel immediately to the north of the Homewood site with frontage along both Sierra College Boulevard and Taylor Road is also currently owned by the Town of Loomis and not a private developer. Without identifying Costco and/or the Town as responsible for construction of these improvements within a specific timeframe, there is further uncertainty regarding the timing of those improvements and their completion. Widening (i.e., to add a third northbound lane) along Costco's frontage alone is not sufficient since a considerable lane transition would then be needed to merge traffic lanes north of Brace Road eventually into a single left, through, and right turn lanes approaching Taylor Road. The forced merge would likely cause further congestion and queuing challenges. If Costco is not conditioned to install all of the ultimately planned improvements in the entire segment (on the east side of Sierra College Boulevard)

between Granite Drive and Taylor Road, the analysis provides an inaccurate depiction of cumulative traffic operations along the Sierra College Boulevard, and likely avoids project impacts that would otherwise have been identified.

3. **Cumulative Land Use Assumptions** – the traffic study does not describe how much, if any, land use was assumed on the vacant parcel located on the west side of Sierra College Boulevard directly opposite the project site. This parcel is situated within the Rocklin City Limits and zoned for retail business (C-2) land uses. According to the City's 2030 travel demand model, this property would yield about 184,400 square feet of retail space. Trips associated with this retail use would turn on/off Sierra College Boulevard at the project's signalized driveway (as well as secondary access along Granite Drive). Peak hour trip data for movements into and out of this site represented in geometrics in the DEIR are extremely small (i.e., 0 or 10) which is likely a default and cannot be accurate given the anticipated size of the future commercial land use allowed by zoning. By ignoring those movements at the project's signalized access, reported delay, LOS, and vehicle queuing are incorrect.

4. **Inadequate Project Access Review on Sierra College Boulevard** – The traffic study does not provide a credible analysis that would allow readers to understand whether the project's signalized access would achieve an acceptable operating condition under cumulative conditions. There are many unknowns that are left unanswered:

    A. What results would be reported had the corridor been properly analyzed using micro-simulation?

    B. If planned improvements are not required, how would the corridor operate if Sierra College Boulevard was not widened to six lanes?

    C. How would the project access intersection operate if a realistic number of trips were assigned to the west leg of the intersection (i.e., in/out of the reasonably foreseeable retail parcel on the west side of Sierra College Boulevard)?

    D. The site plan (confirmed by review of aerial imagery) indicates that approximately 125 feet of vehicle storage would be available in the northbound left-turn lane to accommodate access to the parcel west of Sierra College Boulevard. Would that storage be adequate if that property were accessed from the signal? The analysis should describe the degree to which the project's signalized driveway location accommodates access to this undeveloped property.

Given the seriousness of this issue and potential for adverse effects to the City of Rocklin and undeveloped properties within the City of Rocklin, City staff directed Fehr & Peers to analyze the corridor's cumulative traffic operations using SimTraffic. Those results, which are included in

Appendix C, indicate that even with the widening of Sierra College Boulevard to six lanes between Taylor Road and Granite Drive, the heavy traffic demands, imbalanced lane utilization and close spacing of signalized intersections cause substantial queuing and delays in the corridor and far greater impacts than what is represented in the DEIR.

5. **Vehicle Miles of Travel (VMT) Calculation** – The traffic analysis concludes that "the project would reduce overall regional VMT by 46,000 miles based on existing membership data. The overall project is not expected to increase regional VMT." This conclusion is flawed in a number of ways and does not pass the basic reasonableness test. If a second Costco store is added to the South Placer region, how could VMT not increase? Most Roseville and Rocklin residents know that the Costco Store on Stanford Ranch Road is quite busy most days (and often stay away for that reason). A second store would divert some customers to the new store, but it would also likely induce greater usage of the existing store that would become less crowded. Other concerns with the VMT estimation technique are described in comments on the following pages. The underestimation of VMT has ripple effects on other chapters of the DEIR.

Other errors, invalid assumptions, and shortcomings of the traffic analysis are described below:

- Page 8 identifies a LOS D threshold for Caltrans ramp intersections. The City of Rocklin has and will continue to serve as the lead agency for improvements to the I-80/Sierra College Boulevard and I-80/Rocklin Road interchanges. The City applies a LOS C standard to ramp terminal intersections consistent with its General Plan Policy C-10. This can be demonstrated through review of various environmental documents posted on the City's website at: https://www.rocklin.ca.us/approved-environmental-impact-reports. The traffic study should be updated to reflect the use of a LOS C standard at the Caltrans ramp intersections within the City of Rocklin.

- In light of the results in Appendix C, the identification of queuing impacts in Impact 3.7-3 and 3.7-13 are likely incorrect. Please update the identified queuing impacts and provide revised mitigation measures.

- Page 32 describes how Synchro outputs may include symbols such as "#" and "m" and then states that "the queue length reported by the software next to the symbols was used as there is no methodology to estimate the actual lengths at these locations". In fact, methodologies do exist and are routinely used in impact analyses. Micro-simulation programs like SimTraffic and Vissim produce accurate 95th percentile and maximum queue length estimates assuming the analyst spends the necessary time to adequately calibrate the model.

- The predicted usage of the Brace Road driveway (i.e., 10 total trips during the weekday PM peak hour and 20 total trips during the Saturday peak hour) has likely been underestimated given that this driveway provides direct access to parking located north and east of the building. Motorists may choose to use this driveway to avoid congestion and delays at the signalized project access on Sierra College Boulevard.

- The analysis assumes a western leg at the signalized project driveway intersection under existing plus project conditions. The western leg of the intersection and traffic volume entering and exiting the vacant parcel should not be assumed for this scenario.

- Environmental analysis that relies upon the project's estimated VMT (i.e., air quality, greenhouse gas emissions, etc.) would be incorrect. The VMT estimation process has several logic and technical errors as described below:
    - Page 63 of Appendix E specifies that the VMT estimates do not account for employee trips. Although not stated, they also do not account for delivery trips.
    - Page 63 states that the membership data (upon which VMT estimates are based) does not account for new members that may join Costco as a result of the location of the new warehouse. Isn't the very purpose for building a second store in the South Placer region to attract new members?
    - The calculation supporting the reported VMT reduction value of 46,000 miles per day can be found on page 1,337 of the pdf of Appendix E. A spreadsheet was developed to allocate the project's 12,112 daily trips to zip codes of current customers who visit the Roseville store on Stanford Ranch Road who may shift stores in response to their physical home address. What is the basis to assume that all 12,112 daily trips would be shifted trips to the new store? Wouldn't the new store be expected to attract new members? Wouldn't the existing store then attract new members or more frequent visits by existing members (by virtue of now feeling less busy)? Why weren't shifts from east Roseville, which is a 10-minute drive from the site, not considered? The overall approach is irrational, as evidenced by the spreadsheet showing the addition of 469 trips per day to the new Costco data generated by the Town of Colfax, which has a population of less than 2,000 people.

- Figure 13C indicates that the northbound right-turn volume on Sierra College Boulevard at the project's signalized access would be 519 vehicles during the weekend midday peak hour under existing plus project conditions. However, the corresponding 95th percentile queue length in Table 20 is 67 feet. This result illustrates the unreasonableness of the Synchro queue length outputs. The demand of more than eight vehicles per minute will certainly cause the maximum number of vehicles waiting in the right-turn lane to exceed three. Results from SimTraffic in

Appendix C show this movement would have a 95th percentile queue of 250 feet, which exceeds the 175 feet of available storage and could potentially affect adjacent off-site businesses in Rocklin. Any secondary environmental impacts to off-site businesses and improvements have not been disclosed in the DEIR.

- The DEIR and traffic study do not use appropriate tools and do not provide sufficient information to determine if the signalized project driveway on Sierra College Boulevard would operate acceptably.
    - The cumulative analysis assumes the widening of Sierra College Boulevard to six lanes, which is not reasonably foreseeable unless Costco is required to improve the entire east side from roughly Granite Drive to Taylor Road. It also ignores the traffic generated by a reasonably foreseeable land development that would be accessed from the west leg of the intersection.
    - Synchro does not accurately estimate queue lengths for over-saturated conditions, which will occur under cumulative conditions.
    - The existing plus project 95th percentile vehicle queue in the westbound left-turn lane is 206 feet according to Table 20. Further, there is a "#" symbol attached to this value indicating that "volume exceeds capacity and the queue may be longer". In summary, it has not been demonstrated that an adequate amount of vehicle storage has been provided at the project driveway.
    - According to Figure 13C, the single ingress lane at the signalized driveway would accommodate 757 inbound vehicles during the weekend midday peak hour. Are there any documented studies at other Costco facilities (with a drive aisle opening 150 feet within the driveway to a fueling facility) indicating that this design would function acceptably (i.e., not cause traffic to queue back to Sierra College Boulevard)?

- The use of shading and highlighting of certain turning movement queues in Tables 19 and 20 along with a footnote explain that those conditions indicate "significantly impacted intersections" is confusing, particularly since the impact analysis does not actually show these facilities as being impacted. Please explain the meaning of this footnote.
- The project assumes the I-80/Rocklin Road interchange is improved by adding a third travel lane in each direction on Rocklin Road between the WB and EB ramps. Such an improvement is noted in the Rocklin General Plan EIR as a post 2030 improvement. City of Rocklin traffic impact fees are being collected, however, a sizeable portion of the funding ($10M) is assumed to come from SPRTA Funds. At this time SPRTA has not included this improvement on their current Summary of Potential Allocations and Cash Flow list. Therefore, installation of these improvements should not have been assumed.

- Table 42 shows LOS F (greater than 700 seconds of delay per vehicle) at the Pacific Street/Dominguez Road/Del Mar Avenue intersection. This incorrect result occurs because the analysis does not incorporate the City of Rocklin's planned widening of Pacific Street to four lanes by 2030.

- Evaluation of bicycle, pedestrian, and transit facilities is cursory at best.
    - Do buses operate along Sierra College Boulevard along the project frontage?
    - Sierra College Boulevard features Class II (on-street bike lanes). This route is utilized both by recreational and commuter bicyclists. How will northbound bicyclists be handled at the new signalized intersection serving the project given the large right-turn volume that is expected?
    - Will crosswalks be provided at the signalized project driveway? Which legs?
    - In addition, it is not reasonable to assume the elimination of crosswalks in the City of Rocklin as part of the project mitigation (i.e., Table 70 in DEIR Appendix E page 166 – Sierra College Boulevard and Granite Drive).

- The analysis does not appear to consider additional planned retail space to be situated in the northeast quadrant of the I-80/Sierra College Boulevard interchange. Review of weekday PM peak hour traffic volumes entering/exiting the east leg of the Sierra College Boulevard/Granite Drive intersection (i.e., the primary access to this property) reveals the total volume increases from 320 vehicles under existing conditions to 335 vehicles under cumulative conditions. This minimal growth would suggest development of this property was not assumed.

- The project driveway on Brace Road would be situated either 250 feet (per the Executive Summary) or 300 feet (per the Project Description) east of Sierra College Boulevard. Regardless, how are movements planned to be restricted to right-turns only given there are no median restrictions along Brace Road, and there is a full access driveway into the Homewood development on the north side of the street a short distance to the east?

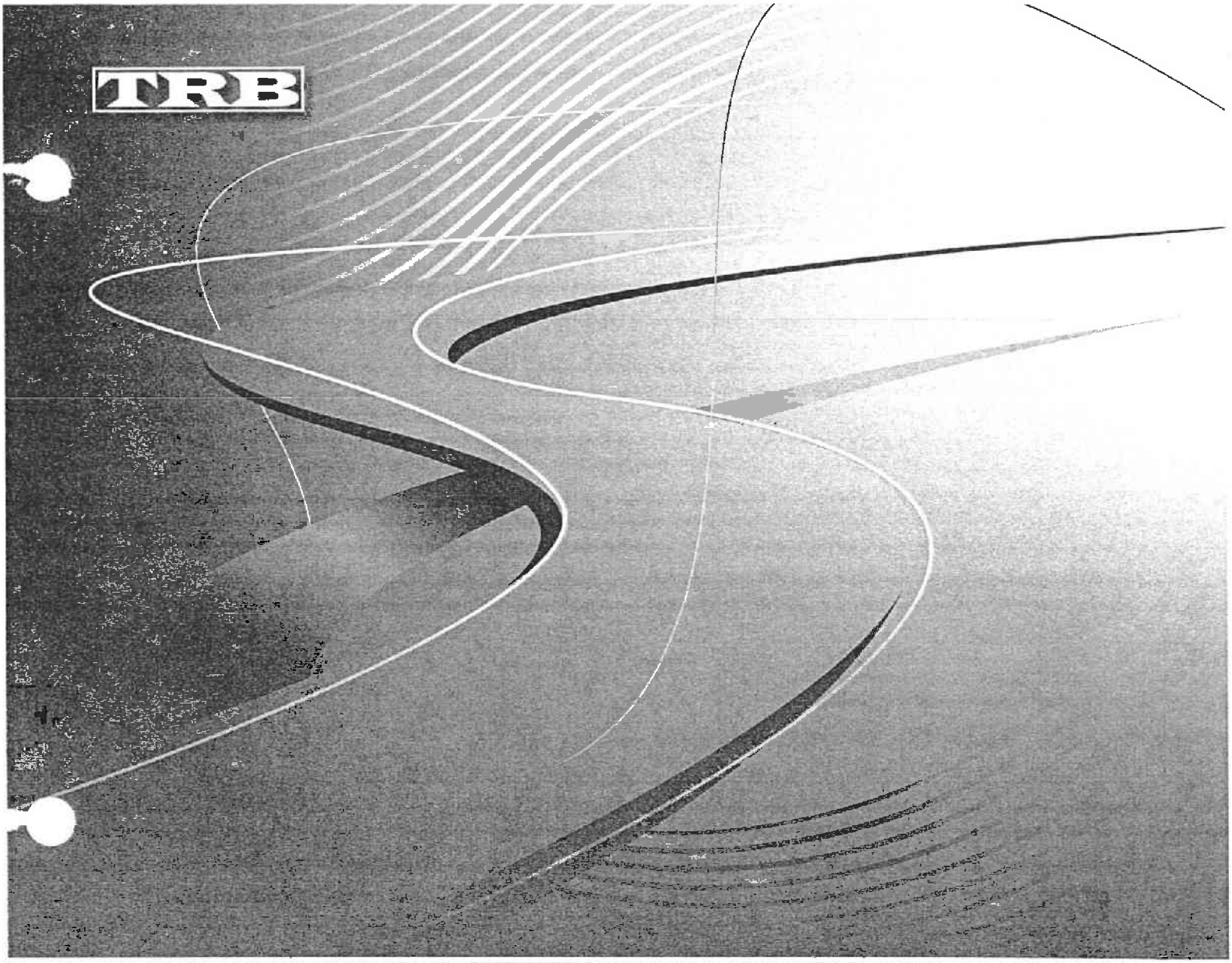
Please call or email with any further questions or comments regarding this matter.

Sincerely,

FEHR & PEERS

John Gard, P.E.
Principal

Appendix A - HCM 2017 Documentation



HIGHWAY CAPACITY MANUAL

6TH EDITION | A GUIDE FOR MULTIMODAL MOBILITY ANALYSIS

VOLUME 1: CONCEPTS

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APPROPRIATE USE OF ALTERNATIVE TOOLS

Situations in which alternative tools might supplement HCM procedures.

Use of alternative tools to supplement HCM capacity and quality-of-service procedures should be considered when one or more of these conditions apply:

- The configuration of the facility or range of the analysis has elements that are beyond the scope of the HCM procedures. Each Volume 2 and 3 chapter identifies the specific limitations of its own methodology.
- Viable alternatives being considered in the study require the application of an alternative tool to make a more informed decision.
- The measures produced by alternative tools are compatible with corresponding HCM measures and are arguably more credible than the HCM measures.

Compatibility of performance measures with the HCM procedures is essential for the use of alternative tools to supplement or replace the HCM procedures.

- The measures are compatible with corresponding HCM measures and are a by-product of another task, such as vehicle delays produced by optimization of a network traffic control system.
- The measures are compatible with corresponding HCM measures and the decision process requires additional performance measures, such as fuel consumption and emissions, that are beyond the scope of the HCM.
- The system under study involves a group of different facilities or travel modes with mutual interactions involving several HCM chapters. Alternative tools are able to analyze these facilities as a single system.
- Routing is an essential part of the problem being addressed.
- The quantity of input or output data required presents an intractable problem for the HCM procedures.
- The HCM procedures predict oversaturated conditions that last throughout a substantial part of a peak period or queues that overflow the available storage space, or both.
- Active traffic and demand management (ATDM) or other advanced strategies are being evaluated.

In addition, when a specific HCM procedure has been developed by using simulation results as a surrogate for field data collection, direct use of the underlying simulation tool to deal with complex configurations that are not covered in the HCM might be appropriate.

The following are considerations in the decision to use an alternative tool:

- Is use of the tool acceptable to the agency responsible for approving decisions that result from it?
- Are the necessary resources, time, and expertise available to apply the tool?
- Does the application rely on a traceable and reproducible methodology?
- Have assumptions used to apply the tool been sufficiently documented?
- Are sufficient and appropriate data available to capitalize on or leverage the strength of the tool?
- Is sufficient time available for calibration to promote a robust reliance on the model output?

If evaluation of multiple analysis periods is determined to be important, then the performance estimates for each period should be separately reported. In this situation, reporting an average performance for the study period is not encouraged because it may obscure extreme values and suggest acceptable operation when in reality some analysis periods have unacceptable operation.

Performance Measures

Performance measures applicable to the motorized vehicle travel mode include volume-to-capacity ratio, control delay, and queue storage ratio. The queue storage ratio describes the ratio of the back-of-queue size to the available vehicle storage length. The back of queue represents the maximum backward extent of queued vehicles during a typical cycle.

LOS is also considered a performance measure. It is useful for describing intersection performance to elected officials, policy makers, administrators, or the public. LOS is based on control delay.

Limitations of the Methodology

This subsection identifies the known limitations of the motorized vehicle methodology. If one or more of these limitations are believed to have an important influence on the performance of a specific street segment, then the analyst should consider using alternative methods or tools for the evaluation.

The motorized vehicle methodology does not account for the effect of the following conditions on intersection operation:

- Turn bay overflow;
- Multiple advance detectors in the same lane;
- Demand starvation due to a closely spaced upstream intersection;
- Queue spillback into the subject intersection from a downstream intersection;
- Queue spillback from the subject intersection into an upstream intersection;
- Premature phase termination due to short detection length, passage time, or both;
- Right-turn-on-red (RTOR) volume prediction or resulting right-turn delay;
- Turn movements served by more than two exclusive lanes;
- Delay to traffic movements that are not under signal control;
- Through lane (or lanes) added just upstream of the intersection or dropped just downstream of the intersection; and
- Storage of shared-lane left-turning vehicles within the intersection to permit bypass by through vehicles in the same lane.

In addition to the above conditions, the methodology does not directly account for the following controller functions:

Appendix B – SPRTA Fee Program Supporting Information

FEHR & PEERS

TECHNICAL MEMORANDUM

Date: December 5, 2014

To: SPRTA Technical Advisory Committee

From: Brandon Haydu and Sarah Brandenberg, Fehr & Peers

Subject: 2014 SPRTA Fee Update – Final Traffic Impact Fees

RS13-3145

This memorandum presents the 2014 traffic impact fees for the South Placer Regional Transportation Authority (SPRTA) fee program. The following information is presented in this memorandum:

- History of the SPRTA fee program
- SPRTA projects with the 2014 fee update
- South Placer Model updates and fee methodology
- Resulting traffic impact fees with the 2014 SPRTA fee update and a comparison to existing fees

The SPRTA Board unanimously approved the fees proposed under the 2014 update in October. Since then, Placer County Board of Supervisors approved an additional fee credit for the Placer Central Fee District. The final SPRTA fees are reflected in this technical memorandum.

BACKGROUND

The SPRTA fee program began in 2002 to fund approximately $125 million for regional transportation projects. The fee program was subsequently updated to fund additional transportation improvements in the South Placer region totaling $153 million in 2006, $191 million in 2007, and $185 million in 2009. Table 1 presents the roadway projects and cost contributions for the original SPRTA fees and the prior fee updates.

Table 1
SPRTA Roadway Projects & Funding Contributions Between 2002 & 2009

Roadway Project	Cost Contribution (millions)			
	Original 2002	2006 Fee Update	2007 Fee Update	2009 Fee Update
Placer Parkway	$50.00	$50.00	$10.00	$10.00
Sierra College Boulevard Widening	$39.60	$43.99	$43.99	$45.37
Lincoln Bypass	$10.00	$20.00	$30.00	$30.00
I-80/Douglas Interchange Improvements	$15.31	$29.04	$29.04	$5.12
Hwy 65 Widening	$0.00	$0.00	$50.00	$67.00
I-80/Rocklin Rd Interchange Improvements	$0.00	$0.00	$10.00	$10.00
Auburn-Folsom Road Widening	$0.00	$0.00	$8.00	$8.00
Transit Projects	$7.00	$7.00	$7.00	$7.00
Administration Costs	$3.00	$3.00	$3.00	$3.00
Total	**$124.91**	**$153.03**	**$191.03**	**$185.49**

Source: Fehr & Peers, 2014.

2014 SPRTA PROJECTS

The roadway improvement projects and funding contributions to be funded by SPRTA as part of the 2014 fee update were determined based on updated construction cost estimates and new projects proposed for consideration by the SPRTA TAC. The following funding contributions were modified for the 2014 fee update:

- **Sierra College Boulevard Widening**: SPRTA is funding the actual cost to widen Sierra College Boulevard from the City of Roseville Southern Limit to the City of Lincoln. Segments 3, 5, 6, and 7 were updated based on actual construction costs for improvements completed to date. Segments 3, 5, and 7 funding contributions were changed by +$170,394, $147,990, and -$944,902, respectively. Segment 6 from Rocklin Road to the City of Roseville Northern Limit was planned to be widened to six lanes in the 2009 fee update, and has since been planned to be restriped to contain two travel lanes in each direction based on anticipated traffic growth along the corridor, reducing the cost from $4.06 million to $507,926. The cost estimates for Segments 1, 2, 8, 9, and

10 were increased by 12.91% to reflect with the Construction Cost Index for inflationary increases since 2009 when the original construction cost estimates were developed. SPRTA's overall funding contribution for Sierra College Boulevard was increased by $70,695. Appendix E provides a detailed breakdown of the Sierra College Boulevard Costs.

- **I-80/SR 65 Interchange**: $5 million of the I-80/SR 65 Interchange improvements has been added to SPRTA with the 2014 fee update.
- **Douglas Boulevard and Atlantic Street Westbound I-80 Ramps**: Improvements for the Douglas Boulevard and Atlantic Street Westbound I-80 Ramps consisting of ramp metering and HOV bypass lanes have been added to the 2014 fee update. The full cost of the on-ramp improvements is $740,000 for Douglas Boulevard Ramp and $4.54 million for Atlantic Street.

Table 2 presents the proposed transportation projects and funding contributions to be funded by SPRTA with the adoption of the 2014 fees. The inclusion of the additional projects in the SPRTA fee program and the updated cost estimates for Sierra College Boulevard result in SPRTA's funding contribution increasing from $185.5 million to $195.8 million for regional transportation projects.

Table 2
Proposed 2014 SPRTA Roadway Projects & Funding Contributions

Roadway Project	Cost Contribution (millions) 2014 Fee Update
Placer Parkway	$10.00
Sierra College Boulevard Widening	$45.44
Lincoln Bypass	$30.00
I-80/Douglas Interchange Improvements	$5.11
Hwy 65 Widening	$67.00
I-80/Rocklin Road Interchange Improvements	$10.00
Auburn-Folsom Widening	$8.00
I-80/SR 65 Interchange	$5.00
Douglas Boulevard WB I-80 Ramp	$0.74
Atlantic Street WB I-80 Ramp	$4.54
Transit Projects	$7.00
Administration Costs	$3.00
Total	**$195.83**

As explained in further detail below, a portion of this cost has already been funded through fees collected by the member jurisdictions prior to the SPRTA fee program and through SPRTA.

SPRTA
Regional Transportation and Air Quality Mitigation Fee Program
SUMMARY OF POTENTIAL ALLOCATIONS AND CASH FLOW

	FY 2005/06		FY 2006/07		FY 2007/08		2008/09		2009/10		2010/11		2011/12		FY 2012/13		FY 2013/14		Totals
	Projected	Actual	Projected	Actual	Projected	Actual	Projected	Actual	Projected	Actual	Projected	Actual	Projected	Actual	Projected	Actual	Projected	Actual	
Beginning Balance	*0*	9479	*13414*	14388	*15878*	19609	*845*	21119	*4234*	15222	*-415*	6656	*-638*	1603	*762*	2572	*422*	2332	
INCOME																			
Projected Income									1000		1100	1100	1500	1500	2000	2000	2500	2500	
Actual Income		6051	5351	5351	5394	5394	2357	2357		1104									
Interest		369	767	767	980	980	427	427	100	96	100	100	100	100	100	100	100	100	
Total Income		15899	*19532*	20506	*22252*	*25003*	*1272*	*23903*	*5234*	*16422*	*605*	*7856*	*862*	*3203*	*2762*	*4672*	*2922*	*4932*	
	Allocated	Spent	Allocated	Spent	Allocated	Spent	Allocated	Spent	Allocated	Spent	Allocated	Spent	Allocated	Spent	Allocated	Spent	Allocated	Spent	
EXPENDITURES																			
Projected																			1180
Bus & Transit	690	690			6286	697	-5686	-297											
Sierra College Blvd																			
Segment 1-2a part																			1466
Segment 3 (note 1)	200	9		37		66		62		18	1223	1274							4023
Segment 5 & part 6	805	22		89		276	-205	122	3433	640		2874							0
Segment 6 part																			0
Segment 7																			
Lincoln Bypass																			20638
Phase 1																			11612
Caltrans					13756	1000		5000		6258		-644							6926
Local - Mainline	100	100	75	75	320	21	691	764		72		80		74	2240	2240			2100
Local - Ferrari	500	500	491	491			323	323											
Phase 2												2069		0					2069
Design/Reserve												500		457					3026
Placer Parkway	57	57	3000	117		734		592		569									5116
I-80/Douglas IC					1000	1000	2000	2000	2116	2116									1305
Admin (incl startup)	133	133	88	88	45	45	115	115	100	95	100	100	100	100	100	100	100	100	38768
Total	*2485*	1511	*3654*	897	*21407*	3884	*-2962*	8681	*5649*	*9766*	*1323*	*6253*	*100*	*631*	*2340*	*2340*	*100*	*100*	
Ending Balance	*13414*	14388	*15878*	19609	*845*	21119	*4234*	15222	*-415*	6656	*-638*	1603	*762*	2572	*422*	2332	*2822*	4832	

Note 1: Sierra College Blvd. segment 3 timing contingent on agreements with Town of Loomis

Printed 01/31/2011

Table C-2
SPRTA Fees Collected to Date

Jurisdiction/Fee District	Fees Collected for SPRTA During Fiscal Year[1]					Total
	2002-05	2005-06	2006-07	2007-08	2008-2013	
Dry Creek	$647,928	$31,034	$19,969	$11,237	$40,736	$750,904
Granite Bay	$510,901	$143,582	$45,339	$40,762	$314,655	$1,055,179
Lincoln	$2,342,482	$1,297,547	$689,439	$514,083	$1,209,246	$6,052,797
Newcastle/Horseshoe Bar	$226,197	$101,582	$80,967	$84,553	$324,908	$818,207
Placer Central	$388,890	$147,574	$75,254	$29,261	$122,709	$763,688
Placer West	$32,035	$6,079	$5,694	$2,155	$12,982	$58,945
Rocklin	$3,318,628	$2,783,318	$2,392,770	$1,076,447	$2,803,045	$12,374,208
Roseville	$3,694,696	$1,379,787	$1,796,361	$2,113,505	$2,823,730	$11,808,079
Sunset	$2,760,935	$149,901	$238,582	$1,491,012	$791,299	$5,431,709
Total	**$13,922,693**	**$6,040,354**	**$5,344,345**	**$5,363,014**	**$8,443,310**	**$39,133,717**

Notes:

1. Fees collected between 2002/03 and 2004/05 provided by SPRTA and Placer County. For 2005/06 through 2007/08 fees collected provided by each jurisdiction. Fiscal year is July 1st – June 30th.

Source: PCTPA, April 2014, City of Roseville, City of Lincoln, City of Rocklin, and Placer County, November 2013.

Color coding legend below:

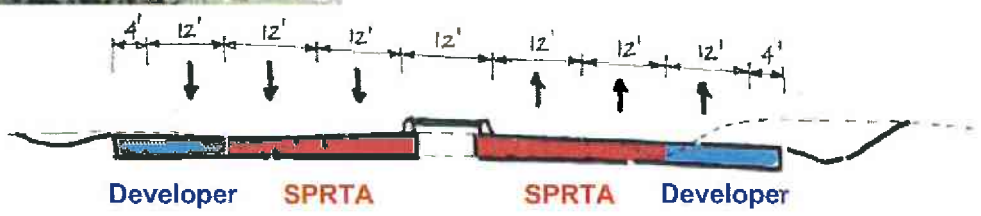
Credits allocated based on 2002 Adopted Fees
Credits allocated based on 2005 Adopted Fees
Credits allocated based on 2007 Adopted Fees
Credits allocated based on 2009 Adopted Fees

Widening at Sierra College Blvd on Segment 3

Taylor Rd to Granite Dr: 6 Lanes

Cross section for Segment 3

Note: Due to poor pavement conditions, existing travel lanes are assumed to be re-built by SPRTA.



Appendix C – Comparison of SimTraffic Versus Synchro Results

Table 70 of the traffic study shows the geometric and signal timing mitigation measures recommended under cumulative plus project conditions. Table 71 shows the resulting LOS results for weekday PM peak hour conditions, which are based on the use of the Synchro program. Table 1 below summarizes these results for the Sierra College Boulevard intersections at Taylor Road, Brace Road, the signalized project driveway, and Granite Drive.

For comparison purposes, Fehr & Peers used the same traffic volumes, lane configurations, and signal timings (150 second cycle length with signal coordination) as the DEIR traffic study, but instead analyzed these intersections using SimTraffic for cumulative plus project weekday PM peak hour conditions. The results are shown in Table 1 (see Appendix D for technical calculations).

Table 1 – Comparison of Synchro vs. SimTraffic Results under Cumulative Plus Project Weekday PM Peak Hour Conditions

Intersection	Analysis Results Based on Synchro[1]		Analysis Results Based on SimTraffic[2]		
	Average Delay	Level of Service	Average Delay	Level of Service	Percent Demand Served[4]
Sierra College Boulevard/ Taylor Road	61	E	55	E	83%
Sierra College Boulevard/ Brace Road	70	E	45	D	81%
Sierra College Boulevard/ Project Dwy.	16	C [3]	27	C	81%
Sierra College Boulevard/ Granite Drive	34	C	49	D	83%

Notes:

[1] Based on results presented in Table 71 of the traffic study (DEIR Appendix E). Results include mitigation measures identified in Table 70.

[2] Based on independent analysis performed by Fehr & Peers using the same traffic volumes, lane configurations, and signal timings.

[3] Capacity increasing mitigation was not identified; thus, results from Table 50 shown here.

[4] Percent demand served represents the proportion of the total hourly travel demand able to pass through the intersection during the peak hour.

While the Synchro and SimTraffic results in Table 1 may appear generally similar, this is not the case. The following pages contain SimTraffic screenshots showing the frequent queue spillbacks from one intersection to the other along Sierra College Boulevard. This occurs for the following reasons (despite signal coordination being in effect):

1. Heavy right-turn travel demands on northbound Sierra College Boulevard at the project driveway (379 vehicles), Brace Road (453 vehicles), and Taylor Road (559 vehicles) cause imbalanced lane utilization along the corridor.
2. The close signalized intersection spacing (combined with the heavy travel demand) limits vehicle maneuverability, thereby causing vehicles to select the desired travel lane further upstream.

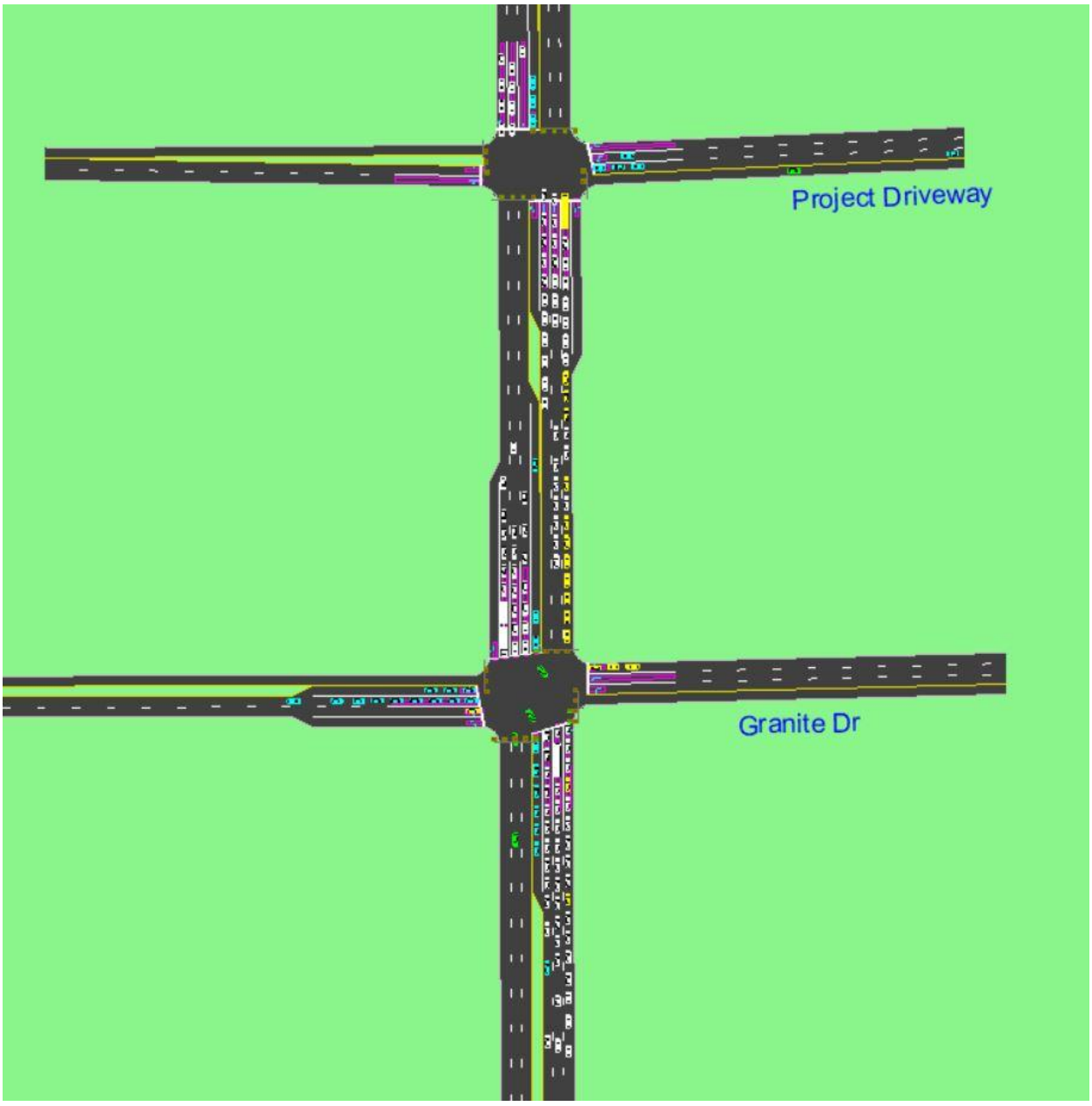
Table 2 shows the 95th percentile queue lengths for key movements at the Sierra College Boulevard intersections with Brace Road and the project driveway. As shown, queues exceed the available storage for most reported movements. It should be reiterated that these results assume the six-lane widening of Sierra College Boulevard and minimal use of the 4th leg of the project driveway signalized intersection. Queuing results would likely be worse had those elements been properly modeled.

Table 2 – 95th Percentile Queue Lengths for Selected Movements under Cumulative Plus Project Weekday PM Peak Hour Conditions

Intersection	**Movement**	**Vehicle Queuing (per lane)**	
		Available Storage [1]	**95th Percentile Queue [2]**
Sierra College Boulevard/ Brace Road	Northbound Through	660 feet	**760 feet**
	Westbound Left	85 feet	**115 feet**
	Westbound Right	250 feet	**860 feet**
Sierra College Boulevard/ Project Dwy.	Southbound Left	225 feet	225 feet
	Southbound Through	660 feet	160 feet
	Northbound Through	500 feet	**565 feet**
	Northbound Right	175 feet	**250 feet**
	Westbound Left	200 feet	**285 feet**
	Westbound Right	200 feet	190 feet

Notes:
[1] Estimated based on review of aerial imagery and project site plan.
[2] Based on independent analysis performed by Fehr & Peers using the same traffic volumes, lane configurations, and signal timings as Appendix E of DEIR.
Note: Bolded cells represent vehicle queues that spill back into adjacent intersection or out of turn pocket.

View of Congestion on Sierra College Boulevard under Cumulative Plus Project Weekday PM peak hour conditions.



View of Congestion on Sierra College Boulevard between Taylor and Brace Roads under Cumulative Plus Project Weekday PM peak hour conditions

Appendix D – Technical Calculations

Intersection 6 **Sierra College Blvd/Taylor Rd** **Signal**

Direction	Movement	Demand Volume (vph)	Served Volume (vph) Average	Served Volume (vph) Percent	Total Delay (sec/veh) Average	Total Delay (sec/veh) Std. Dev.	LOS
NB	Left Turn	151	120	79.7%	40.2	7.7	D
	Through	1,515	1,344	88.7%	15.6	4.5	B
	Right Turn	559	393	70.4%	9.7	1.6	A
	Subtotal	2,225	1,858	83.5%	16.0	3.8	B
SB	Left Turn	40	33	83.7%	107.1	21.9	F
	Through	989	887	89.6%	45.7	4.5	D
	Right Turn	70	64	92.0%	3.5	1.9	A
	Subtotal	1,099	984	89.6%	45.1	4.1	D
EB	Left Turn	150	110	73.1%	124.6	62.4	F
	Through	335	275	82.2%	135.2	53.7	F
	Right Turn	300	270	90.0%	25.3	5.8	C
	Subtotal	785	655	83.4%	87.8	32.7	F
WB	Left Turn	612	437	71.4%	157.1	34.8	F
	Through	185	133	71.8%	152.5	31.2	F
	Right Turn	70	51	72.5%	135.9	36.2	F
	Subtotal	867	620	71.6%	154.5	33.9	F
Total		4,976	4,118	82.8%	55.2	5.0	E

Intersection 7 **Sierra College Blvd/Brace Rd** **Signal**

Direction	Movement	Demand Volume (vph)	Served Volume (vph) Average	Served Volume (vph) Percent	Total Delay (sec/veh) Average	Total Delay (sec/veh) Std. Dev.	LOS
NB	Left Turn						
	Through	2,100	1,669	79.5%	44.7	4.2	D
	Right Turn	453	314	69.3%	61.2	6.5	E
	Subtotal	2,553	1,983	77.7%	47.4	3.8	D
SB	Left Turn	362	273	75.3%	66.9	11.7	E
	Through	1,374	1,180	85.9%	11.5	1.9	B
	Right Turn	145	127	87.8%	5.9	0.8	A
	Subtotal	1,881	1,580	84.0%	20.6	3.6	C
EB	Left Turn						
	Through						
	Right Turn	485	441	90.9%	47.5	25.9	D
	Subtotal	485	441	90.9%	47.5	25.9	D
WB	Left Turn	261	198	75.9%	128.3	52.9	F
	Through						
	Right Turn	270	213	78.8%	110.7	57.5	F
	Subtotal	531	411	77.3%	118.9	55.5	F
Total		5,450	4,415	81.0%	44.5	6.6	D

Intersection 24 **Sierra College Blvd/Project Dwy** **Signal**

Direction	Movement	Demand Volume (vph)	Served Volume (vph) Average	Served Volume (vph) Percent	Total Delay (sec/veh) Average	Total Delay (sec/veh) Std. Dev.	LOS
NB	Left Turn	10	5	51.5%	74.4	57.2	E
	Through	2,480	1,939	78.2%	31.3	5.5	C
	Right Turn	379	270	71.2%	24.4	7.2	C
	Subtotal	2,869	2,214	77.2%	30.6	5.8	C
SB	Left Turn	145	125	86.0%	95.4	17.7	F
	Through	2,060	1,740	84.4%	7.1	1.0	A
	Right Turn	10	7	73.6%	4.7	4.5	A
	Subtotal	2,215	1,872	84.5%	13.1	2.2	B
EB	Left Turn	10	7	73.6%	63.2	44.9	E
	Through	10	8	84.6%	61.9	45.9	E
	Right Turn	10	9	88.3%	34.3	29.9	C
	Subtotal	30	25	82.2%	59.9	14.9	E
WB	Left Turn	395	358	90.6%	66.9	7.8	E
	Through						
	Right Turn	166	142	85.8%	43.6	4.8	D
	Subtotal	561	500	89.2%	60.2	5.7	E
Total		5,675	4,611	81.3%	26.8	2.2	C

Intersection 8 **Sierra College Blvd/Granite Dr** **Signal**

Direction	Movement	Demand Volume (vph)	Served Volume (vph) Average	Served Volume (vph) Percent	Total Delay (sec/veh) Average	Total Delay (sec/veh) Std. Dev.	LOS
NB	Left Turn	230	203	88.3%	94.7	11.4	F
	Through	2,169	1,784	82.3%	55.5	24.4	E
	Right Turn	50	35	70.7%	76.6	46.9	E
	Subtotal	2,449	2,023	82.6%	59.6	23.2	E
SB	Left Turn	95	73	77.1%	87.7	18.1	F
	Through	1,961	1,601	81.6%	27.4	1.0	C
	Right Turn	179	159	88.8%	11.9	1.1	B
	Subtotal	2,235	1,833	82.0%	28.5	1.2	C
EB	Left Turn	418	339	81.0%	119.0	38.0	F
	Through	25	20	81.0%	139.3	36.4	F
	Right Turn	295	277	93.8%	22.2	2.2	C
	Subtotal	738	636	86.1%	77.9	21.9	E
WB	Left Turn	80	72	89.7%	61.5	10.2	E
	Through	20	17	84.6%	61.7	37.4	E
	Right Turn	65	60	92.3%	51.7	13.3	D
	Subtotal	165	149	90.1%	58.2	8.1	E
Total		5,587	4,640	83.1%	49.4	10.1	D

Intersection 6 **Sierra College Blvd/Taylor Rd** **Signal**

Direction	Lane Group	Storage (ft)	Average Queue (ft) Average	Std. Dev.	95th Queue (ft) Average	Std. Dev.	Maximum Queue (ft) Average	Std. Dev.	Block Time Pocket	Upstream
EB	Left Turn	120	108	20	183	18	144	1	14%	0%
	Through	1,359	580	228	843	385	820	349	64%	1%
	Right Turn	1,359	138	29	229	43	348	358	0%	0%
NB	Left Turn	190	71	21	141	35	149	42	0%	0%
	Through	524	71	40	133	67	147	73	0%	0%
	Right Turn	524	26	10	65	27	74	36	0%	0%
SB	Left Turn	215	79	33	196	89	193	76	0%	0%
	Through	701	368	44	509	63	518	61	32%	0%
	Right Turn	701	15	6	31	9	31	14	0%	0%
WB	Left Turn	150	173	5	176	8	174	0	50%	0%
	Through	2,822	1,098	285	1,796	477	1,838	478	17%	0%
	Right Turn	150	51	21	118	50	124	55	0%	0%

Intersection 7 **Sierra College Blvd/Brace Rd** **Signal**

Direction	Lane Group	Storage (ft)	Average Queue (ft) Average	Std. Dev.	95th Queue (ft) Average	Std. Dev.	Maximum Queue (ft) Average	Std. Dev.	Block Time Pocket	Upstream
EB	Right Turn	764	271	121	415	202	390	174	0%	0%
NB	Through	662	448	68	762	67	698	44	0%	2%
	Through/Right	662	618	38	773	43	687	20	0%	14%
SB	Left Turn	155	174	5	187	5	179	1	38%	0%
	Through	524	350	67	517	84	464	71	0%	1%
	Through/Right	524	85	19	163	29	164	24	0%	0%
WB	Left Turn	85	107	3	113	5	109	0	62%	0%
	Right Turn	1,232	571	247	860	360	892	265	32%	5%

Intersection 8 **Sierra College Blvd/Granite Dr** **Signal**

Direction	Lane Group	Storage (ft)	Average Queue (ft) Average	Std. Dev.	95th Queue (ft) Average	Std. Dev.	Maximum Queue (ft) Average	Std. Dev.	Block Time Pocket	Upstream
EB	Left Turn	185	186	16	246	28	209	0	3%	0%
	Left/Through	917	464	155	668	231	659	193	61%	2%
	Right Turn	917	129	39	240	166	260	236	1%	0%
NB	Left Turn	170	180	8	217	13	195	1	29%	0%
	Through	1,082	466	137	751	284	803	247	17%	3%
	Through/Right	1,082	509	140	793	296	857	247	0%	6%
SB	Left Turn	280	100	27	203	64	222	31	0%	0%
	Through	499	299	19	463	27	459	27	17%	0%
	Right Turn	190	103	37	241	47	214	2	0%	0%
WB	Left Turn	478	70	18	121	27	116	30	0%	0%
	Through	478	22	13	60	35	71	37	0%	0%
	Right Turn	478	54	8	100	23	97	26	0%	0%

Intersection 24 **Sierra College Blvd/Project Dwy** **Signal**

Direction	Lane Group	Storage (ft)	Average Queue (ft) Average	Std. Dev.	95th Queue (ft) Average	Std. Dev.	Maximum Queue (ft) Average	Std. Dev.	Block Time Pocket	Upstream
EB	Left Turn	499	11	8	31	15	31	14	0%	0%
	Through/Right	499	20	9	46	16	43	18	0%	0%
NB	Left Turn	125	10	13	36	41	46	54	0%	0%
	Through	499	400	62	563	77	527	61	44%	5%
	Right Turn	175	173	22	248	29	200	0	1%	0%
SB	Left Turn	225	149	26	221	30	197	28	2%	0%
	Through	662	85	25	155	73	163	72	1%	0%
	Through/Right	662	94	22	162	34	163	38	0%	0%
WB	Left Turn	422	210	22	284	29	283	34	0%	0%
	Through/Right	422	107	24	189	25	189	23	0%	0%

Attachment B

ROCKLIN
CALIFORNIA

July 24, 2018

Marc Mondell, Director
City of Rocklin ECD Department
3970 Rocklin Road
Rocklin, CA 95677

SUBJECT: Comments on Loomis Costco Draft EIR

Dear Mr. Mondell:

I have completed my review of the Loomis Costco Draft EIR and have identified comments that focus on the comprehensiveness and accuracy of the analysis. Based on the project description provided in the Draft EIR, the 17.4 +/- acre project is located on the east side of Sierra College Boulevard and south of Brace Road and consists of a 152,101 square foot Costco Wholesale warehouse building, with 777+/- parking stalls, a 24-dispenser fuel facility with potential expansion to 30 dispensers, and associated landscaping and street frontage improvements. Other aspects of the project include temporary outdoor sales within the parking field for seasonal sales, a tire center, vehicle display near the building entry for on-line and off-site automobile sales, and signage. The warehouse hours are anticipated to be Monday-Friday, 10:00 a.m. to 8:30 p.m., Saturday from 9:30 a.m. to 6:00 p.m. and Sunday from 10:00 a.m. to 6:00 p.m., and the fuel facility hours are anticipated to be daily from 5:00 a.m. to 10:00 p.m.

Primary vehicular access to the project site for the general public, fuel trucks and other merchandise delivery trucks exiting the site would be provided from a proposed new signalized intersection on Sierra College Boulevard. A secondary limited right-in and right-out driveway entrance is proposed on Brace Road and primarily intended for incoming merchandise truck deliveries and emergency exiting. Costco delivery trucks ranging in size from 26 feet to 70 feet will average about 10 per typical weekday, with receiving times from 2:00 a.m. to 9:00 p.m., averaging 2 to 3 trucks per hour, with most of the deliveries completed before the 10:00 a.m. opening time. Double-axle fuel trucks for the fueling facility will average two to three trucks per day.

As an introduction to my comments below and by way of background, I have been employed by the City of Rocklin since 2002, with my primary function being to ensure CEQA compliance for the City. This includes instances where the City is lead agency and the proponent of projects, as well as situations where the City is reviewing outside agency projects. Prior to my tenure at the

City of Rocklin, I worked for the City of Sacramento for twelve years, also in a CEQA compliance position. In those capacities, I have prepared and reviewed environmental documents, managed consultant preparation of environmental documents, consulted with inside and outside legal counsel on the preparation of environmental documents, and continued my training and education on the preparation of environmental documents. It is with that background, knowledge and understanding that I offer the following comments:

GENERAL COMMENTS:

1. Section 2.6, Permits and Approvals – an encroachment permit from the City of Rocklin will be necessary for any work that takes place within the City's right-of-way.

AESTHETICS:

1. Section 3.2.1.2 - the discussion of views of the project site acknowledges that viewers of the project site include apartment residents to the north and single family residents to the east, yet the two key viewpoints selected for the aesthetics analysis are viewpoints from the motoring public on Sierra College Boulevard and Brace Road. The selection of those viewpoints ignores the fact that the motoring public experiences views of the project site from those roadways while momentarily driving by and that those who live by the project site who spend considerable more time within their residences and will have to live directly adjacent to the Costco warehouse are not having their viewpoints represented.

2. Page 3.2-14 notes that most residents east of the project site would not see the proposed building because of the preservation of the existing, mature tree canopy found along the rear property boundary and incorporation of a landscape setback. This statement fails to acknowledge that much of the existing tree canopy consists of deciduous trees and it not a continuous canopy. Cross-sections should have been developed to demonstrate whether or not a 33 foot tall building and 37 foot tall parking lot light standards will be visible from the adjacent residences.

3. Page 3.2-14 – the project's visual impact along Sierra College Boulevard is downplayed because of anticipated project landscaping but most of the tree species proposed as part of the project's landscaping are deciduous and will be of such a size when initially planted that they will have limited screening ability. These facts are not recognized in the impact analysis.

4. Table 3.2-1, Compliance with Town Development Standards –
    a) Screening Between Different Land Uses – the discussion of what is required notes that "proposed walls and fences shall be designed to

incorporate decorative features on both sides, as approved by the director, to avoid the appearance of long, unbroken flat planes without visual interest." The consistency discussion refers back to discussion under item A.(1.), but that discussion is silent on decorative elements and renderings and discussions of the various walls and fences in the DEIR do not identify any design elements as required by the above language.

AIR QUALITY

5. Impact 3.3-1, Generation of Temporary, Short-Term, Construction-Related Emissions of Criteria Pollutants and Precursors, Mitigation Measure AQ-1b. – the mitigation measure identifies a series of five bullet items to reduce NOx emissions and then includes a statement "If, after application of the above pollutant control measures, emission would still exceed PCAPCD thresholds for NOx, the project applicant shall implement the following PCAPCD-recommended construction mitigation measures, as listed below or as they may be updated in the future." While the statement provides a performance standard for when the additional mitigation should be implemented, such a provision simply does not work from a timing and check and balance (monitoring and enforcement) perspective. How is it to be determined if application of the initial bullet list of mitigation measures results in emissions that still exceed the PCACPD thresholds for NOx? There is no method identified in the mitigation measure, and likely no practical way in the field, to determine if the secondary mitigation measure needs to be implemented. The mitigation measure should be revised to address the deficiency noted above.

6. Impact 3.3-1, Generation of Temporary, Short-Term, Construction-Related Emissions of Criteria Pollutants and Precursors, Mitigation Measure AQ-1c – the mitigation measure notes "To the extent possible, the construction contractor shall use new and renewable building materials extracted and manufactured in the region, and purchase materials locally for the masonry concrete requirements. Rather than rely on a "To the extent possible..." provision and to truly implement this mitigation measure and make it enforceable, the mitigation measure should identify a requirement that the bidding process for the project, including the request for proposals and award of bid process, as well as the construction documents themselves include the mitigation measure language.

7. Impact 3.3-2, Generation of Long-Term Operational Emissions of Criteria Pollutants and Precursors – within the second paragraph of the impact discussion after language summarizing that the traffic impact study prepared for the project shows that the new Costco store would reduce the overall travel demand compared to existing conditions, it is noted that "However, this impact evaluation provides a conservative estimate of

emissions by assuming that all trips to the Costco center would be new trips. Table 3.3-6 then shows the total daily operational emissions and identifies that the emissions of NOx would exceed the PCAPCD threshold of significance. Contrary to the prior statement that the impact evaluation would conservatively assume all new trips and lacking any specific guidance to do so within the PCAPCD CEQA Air Quality Handbook, the impact discussion inexplicably then resorts to claims that the project will reduce overall Vehicle Miles Traveled (VMT) in the region and that such a reduction in VMT and associated NOx emissions then leads to an impact conclusion of less than significant. Notwithstanding the concerns with the accuracy of the VMT calculations as expressed in the Fehr and Peers analysis and later in this comment letter, the less than significant conclusion is not supported by a quantification of the reduction of NOx emissions that would actually be achieved as a result of the purported VMT reduction. This approach is inconsistent with CEQA principles and the Draft EIR's stated numerical thresholds of significance for air quality impacts. Furthermore, given that the use of reduced VMT is being used as a mitigation measure to reduce the NOX emissions that were first calculated to exceed the PCAPCD's and Draft EIR's significance thresholds for air quality impacts, the approach is inconsistent with the section of the PCAPCD CEQA Air Quality Handbook for analyzing operational criteria pollutant emissions which states "At the very least, the project's mitigated emissions after the mitigation implementation should be quantified and disclosed in its CEQA document."

8. Mitigation Measure AQ-3a – the mitigation measure's approach of identifying that the project should conduct a Health Risk Assessment (HRA) prior to the receipt of a building permit constitutes deferral of mitigation in that is deferring the HRA as a study to determine whether adverse effects would occur.

BIOLOGY

9. Mitigation Measure Bio-2 – Given that oak trees can grow to heights 50-100+ feet tall and have canopies 60-100+ feet wide, depending upon the species, according to horticultural/arborist resources oak trees should be planted 10-40 feet away from all other trees. Given those parameters, it is questionable whether the project site supports enough room to accommodate the planting of 290 15-gallon container trees of appropriate oak species based upon the necessary spacing required for mature oak trees. It is also questionable whether a large asphalt parking area with small planting areas and it's "heat island" effect is an environment conducive to oaks living prosperously. The project's Landscape Plan (Figure 2-6) only depicts Interior Live Oak and not the Blue Oak or Valley Oak species in the quantities that are specified in Table 3.4-4, Protected Oak

Tree Mitigation Totals. It may be prudent and necessary for the project to mitigate for the loss of oak trees in a manner other than replacement on-site.

GREENHOUSE GAS EMISSIONS/ENERGY

10. Impact 3.5-1, Generation of Greenhouse Gas Emissions – the Greenhouse Gas Emissions Methodology discussion notes that a quantitative analysis of project-related GHG emissions was conducted. Table 3.5-3 then shows the total annual operational emissions of 17,232 MTCO2e/year would exceed the PCAPCD *de minimis* threshold of significance of 1,110 MTCO2e/year and the PCAPCD bright-line threshold of 10,000 MTCO2e/year. Per PCAPCD guidance for instances when the above thresholds are exceeded, the analysis then calculates an efficiency threshold based on proposed floor square footage and presents that the project's annual operational emissions are estimated to be 110 MTCO2e per year per 1,000 square feet, which exceeds the PCAPCD threshold of 26.5 MTCO2e per year per 1,000 square feet. Contrary to the prior statement that a quantitative analysis of GHE emissions was conducted and lacking any specific guidance to do so within the PCAPCD CEQA Air Quality Handbook, the impact discussion inexplicably then resorts to claims that the project will reduce overall Vehicle Miles Traveled (VMT) in the region and that such a reduction in VMT and associated reduction in mobile source emissions, leading to an impact conclusion of less than cumulatively considerable. Notwithstanding the concerns with the accuracy of the VMT calculations as expressed in the Fehr and Peers analysis, the less than cumulatively considerable conclusion is not supported by a quantification of the reduction of GHG emissions that would be achieved as a result of the purported VMT reduction which is inconsistent with CEQA principles as well as the section of the PCAPCD CEQA Air Quality Handbook for analyzing GHG emissions which notes that if the total GHG emissions exceed the bright-line threshold of 10,000 MTCO2e/year, "The project's related GHG impacts are considered cumulatively considerable and all feasible mitigation measures should be identified to mitigate the project's related GHG emissions." The PCAPCD CEQA Air Quality Handbook also states "When the operational GHG emissions exceed the bright-line thresholds or exceeds the Efficiency Matrix thresholds, a lead agency is responsible in identifying the necessary feasible mitigation measures for the operational GHG emissions, to reduce the project's related GHG impacts."

CEQA requires that "[e]ach public agency shall mitigate or avoid the significant effects on the environment of projects that it carries out or approves whenever it is feasible to do so." (Public Resources Code Section 21002.1(a); *see Citizens of Goleta Valley v. Board of Supervisors of Santa Barbara County* (1990) 52Cal.3d 553, 564-65). Under CEQA, global warming is an "effect on the environment" and a project's contribution to global warming can be significant or cumulatively considerable. CEQA requires that all phases of

a project must be considered when evaluating the project's impacts on the environment (CEQA Guidelines Section 15126)

The Draft EIR fails to adequately address GHG emissions. The analysis fails to completely recognize the Governor's Office of Planning and Research's June 19, 2008 Technical Advisory entitled *CEQA and Climate Change: Addressing Climate Change Through California Environmental Quality Act (CEQA) Review.* In the Technical Advisory, OPR provides a recommended approach:

Each public agency that is a lead agency for complying with CEQA needs to develop its own approach to performing a climate change analysis for projects that generate GHG emissions. A consistent approach should be applied for the analysis of all such projects, and the analysis must be based on best available information. For these projects, compliance with CEQA entails three basic steps: identify and quantify the GHG emissions; assess the significance of the impact on climate change; and if the impact is found to be significant, identify alternatives and/or mitigation measures that will reduce the impact below significance. (Technical Advisory, page 5)

The Technical Advisory also directs lead agencies to assess whether the emissions are individually or cumulatively significant. *(Id.)* Thus, the lead agency must consider the impact of the project when viewed in connection with the effects of past, current, and probable future impacts. *(Id.)* In identifying GHG emissions, OPR's Technical Advisory states:

"Lead agencies should make a good-faith effort, based on available information, to calculate, model, or estimate the amount of CO2 and other GHG emissions from a project, including the emissions associated with vehicular traffic, energy consumption, water usage and construction activities." (Technical Advisory, page 5)

OPR's Technical Advisory cautions lead agencies that GHG emissions should not be dismissed without substantial evidence to support the decision.

"Lead agencies should not dismiss a proposed project's direct and/or indirect climate change impact without careful consideration, supported by substantial evidence. Documentation of available information and analysis should be provided for any project that may significantly contribute new GHG emissions, either individually or cumulatively, directly or indirectly (e.g., transportation impacts). "*(Id.)*

In the present situation, the Draft EIR's analysis does in fact dismiss the project's GHG emissions without any substantial evidence. The Draft EIR makes an incomplete effort to quantify the project's GHG emissions by not quantifying the amount of emissions that would be reduced by the project's purported VMT reduction. The analysis of GHG emissions is also inadequate because it fails to follow the guidance contained within the PCAPCD CEQA Air Quality Handbook for instances when their thresholds are exceeded and mitigation measures must be identified. Finally, it is also not clear that the loss of carbon sequestration provided by the project site's oak trees which will be removed by the project has been considered in the GHG analysis.

11. Within the discussion of Impact 3.5-2, Consumption of Energy, Table 3.5-4 presents construction fuel consumption in both total amounts and amortized over a 20-year period. Given that the consumption of fuel during construction is a singular event, it is not clear why the analysis has chosen to present an amortized rate of construction fuel consumption other than perhaps to dilute a true representation. The impact analysis continues with the reasoning that a reduction in construction fuel consumption and increased energy efficiency would occur as a result of Mitigation Measure AQ-1c from Section 3.3, Air Quality. As noted above, the mitigation measure notes "To the extent possible, the construction contractor shall use new and renewable building materials extracted and manufactured in the region, and purchase materials locally for the masonry concrete requirements. Rather than rely on a "To the extent possible..." provision and to truly implement this mitigation measure, the mitigation measure should identify a requirement that the bidding process for the project, including the request for proposals and award of bid process, as well as the construction documents themselves include the mitigation measure language as it currently exists.

12. Impact 3.5-2, Consumption of Energy, Transportation Related Energy Consumption – the less than significant conclusion is based on a purported reduction in regional VMT. Note the concerns expressed in the Fehr and Peers analysis and below regarding the VMT calculations.

NOISE

13. It is difficult to understand that the noise from the Union Pacific Railroad, which is less than 1,000 feet away from the project site, and whose locomotives sound their horns at the railroad track crossing of Sierra College Boulevard just north of Taylor Road, is not discussed or apparently not accounted for in the analysis.

14. Table 3.6-7, Worst-Case Construction Equipment Noise Levels at the Nearest Uses in the Project Vicinity – the discussion following the table notes that an exterior-to-interior

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

15. Impact 3.6-3, Exposure of Existing Noise-Sensitive Receivers to a Substantial Permanent Increase in Ambient Noise Levels in the Project Vicinity Above Levels Existing Without the Project from Increased Long-Term Traffic – the impact analysis notes that traffic noise levels were modeled under existing, with and without implementation of the project and study segment volumes were derived from a.m. peak intersection turning movements provided by the project's traffic consultant. There are several concerns that such an approach significantly underestimates true noise levels. Namely, the p.m. peak hour typically includes more traffic than the a.m. peak hour, and the a.m. peak hour typically occurs between 7-9 a.m., prior to the Costco store opening hour of 10:00 a.m. on weekdays and Sundays and 9:30 a.m. on Saturdays.

16. Impact 3.6-4, Exposure of Existing Noise-Sensitive Receivers to a Substantial or Periodic Increase in Ambient Noise Levels in the Project Vicinity Above Levels Existing Without the Project from Operation of Stationary Sources – the impact discussion makes the assumption that parking lot sweepers will be restricted to daytime hours to be consistent with the Town's Noise Policy 17, which limits the use of parking lot sweepers if their activity will result in noise which adversely affects residential areas. The nature of parking lot sweepers is that they perform best when a parking lot is empty, which means after a store's operating hours. It is difficult to accept that parking lot sweepers for the Costco project will only operate during daytime hours and such an assumption should be memorialized as a mitigation measure to ensure parking lot sweepers will in fact only operate during daytime hours (*Lotus v. Department of Transportation, (2014) 223 Cal. App 4th 645*).

17. Impact 3.6-4, Exposure of Existing Noise-Sensitive Receivers to a Substantial or Periodic Increase in Ambient Noise Levels in the Project Vicinity Above Levels Existing Without the Project from Operation of Stationary Sources – the impact discussion makes the statement "In order to limit the impact of heavy truck trips to level of service at study intersections, Costco plans to conduct warehouse deliveries during the nighttime hours,

with up to three trucks per hour. While it is correct to note that deliveries will occur during the nighttime hours, they will also occur during daytime hours as the Project Description notes that "Warehouse shipments would be received between 2 a.m. and 9 p.m., averaging two to three trucks per hour, with most deliveries completed by 10 a.m." Similar to above, the restrictions regarding warehouse delivers should be memorialized as a mitigation measure to ensure the noted delivery hours (*Lotus v. Department of Transportation, (2014) 223 Cal. App 4th 645*).

TRANSPORTATION

18. Table 3.7-13, Trip Characteristics for the Proposed Costco Fueling Station – the total trip rate of 336 a.m. peak hour trips is based on 24 fueling dispensers. The trip generation rate should have conservatively used p.m. peak hour data as traffic during that time of day is typically heavier than the a.m. peak hour, and it should have been based on 30 fueling stations rather than 24 because the Project Description notes that the fueling stations could be expanded in the future to include 30 fueling stations. These flaws underestimate the project's trip generation, and as one of the cornerstones of a traffic analysis, the flaws also lead to an inaccurate traffic analysis.

19. Mitigation Measure Trans-2, Provide Signal Coordination – the mitigation measure recognizes that the affected intersections of Sierra College Boulevard/Granite Drive and Sierra College Boulevard/I-80 WB ramps are within the jurisdiction of the City of Rocklin and cannot be mitigated by the Town of Loomis. However, the mitigation measure should require that the Town of Loomis make a good faith to negotiate with the City of Rocklin to fund and implement the identified signal coordination.

20. Mitigation Measure Trans-3, Prepare and Implement a Construction Traffic Control Plan – given the project's location adjacent to the City of Rocklin and its roadways and intersections, the preparation and implementation of a construction traffic control plan must be coordinated with the City of Rocklin.

21. Impact 3.7-4, Project-Related Interference with Emergency Access – the impact analysis discusses fueling station queuing and the use of observational data from other Costco fueling facilities, and then notes that the observed data was extrapolated to the Loomis site with 24 fueling dispensers. Similar to above, the analysis should have been based on 30 fueling stations rather than 24 because the Project Description notes that the fueling stations could be expanded in the future to include 30 fueling stations. This flaw underestimate the project's queuing potential.

22. Impact 3.7-5, Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities or otherwise materially decrease the performance or safety of such facilities – the impact discussion fails to acknowledge that there is a Class II bikeway along Sierra College Boulevard and how a single point of access and vehicles entering and exiting the project site will create conflicts with bicyclists.

23. Impact 3.7-6, Changes in Vehicle Miles Traveled – the analysis makes the presumption that vehicle trip length would be shortened by approximately 5 miles per trip based on the project being 5 miles away from the existing Costco located in Roseville (as one would travel along State Route 65 to I-80). This presumption does not take into account that many existing Costco customers do not travel the assumed State Route 65 to I-80 route because of the daily congestion in that corridor, and instead customers choose surface streets and alternative routes to get access to the existing Roseville Costco. In addition, the daily VMT reduction of 46,000 miles is footnoted with a claim that any additional induced trips based on the location of the new warehouse would likely occur within the Town of Loomis and City of Rocklin and would not substantially increase the estimated VMT. This claim is difficult to believe given the nature of wholesale discount warehouses, the anticipated growth in the region beyond just Loomis and Rocklin, and particularly in light of the data regarding the diversity of locations that customers are currently coming from to the existing Costco located in Roseville.

CUMULATIVE

24. Impact 4.3-2, Result in a Cumulatively Considerable Net Increase in a Criteria Pollutant for which the Region is Nonattainment under an Applicable Federal or State Ambient Air Quality Standard – the impact discussion and attempted reliance upon VMT reduction contain the same shortcomings as noted above in comments on Impacts 3.3-1 and 3.3-2.

25. Impact 4.3-6, Cumulative Greenhouse Gas Impacts - the impact discussion and attempted reliance upon VMT reduction contain the same shortcomings as noted above in comments on Impacts 3.5-1 and 3.5-2.

26. Mitigation Measure Cum-Trans-2: Add Exclusive Turn Lanes at Sierra College Boulevard/I-80 Westbound Ramps –the mitigation measure appears to be in error as southbound dual left turn lanes already exist at the intersection and a left turn lane goes in the southbound direction, not the northbound direction.

27. Page 4-17 (Impact 4.3-8, Mitigation Measures Cum-Trans-1 and Cum-Trans-2) – the discussion notes "Impacts at Sierra College Boulevard/Granite Drive and Sierra College Boulevard/I-80 westbound ramps could be mitigated with proposed mitigation

measures; however, these measures would be infeasible within the existing roadway width and therefore may not be implementable due to the need for right of way acquisition." Because an EIR must discuss mitigation measures that are feasible and enforceable, a conclusion of infeasibility for a mitigation measure cannot be reached and there is a duty to identify other mitigation measures that would in fact be feasible.

28. Mitigation Measures Cum-Trans-1, Cum-Trans-2 and Cum-Trans-3 – the mitigation measure recognizes that the affected intersections of Sierra College Boulevard/Granite Drive and Sierra College Boulevard/I-80 WB ramps are within the jurisdiction of the City of Rocklin and cannot be mitigated by the Town of Loomis. However, the mitigation measure should require that the Town of Loomis make a good faith to negotiate with the City of Rocklin to fund and implement the identified improvements.

29. Impact 4.3-15, Cumulative Decrease in Performance of Safety of Public Transit, Bicycle or Pedestrian Facilities – similar to Impact 3.7-5, the impact discussion fails to acknowledge that there is a Class II bikeway along Sierra College Boulevard and how a single point of access and vehicles entering and exiting the project site will create conflicts with bicyclists.

30. Senate Bill 743 (SB 743), which was signed by Governor Brown on September 27, 2013, created a process to change the way transportation impacts are analyzed under CEQA. Based upon direction provided in SB 743, on November 27, 2017 the Governor's Office of Planning and Research transmitted to the California Natural Resources Agency its proposal for comprehensive updates to the CEQA Guidelines, including proposed updates related to analyzing transportation impacts pursuant to SB 743. Until such time that the Natural Resources Agency completes its formal administrative rulemaking process and the Office of Administrative Law reviews and approves any changes to the CEQA Guidelines, the use of VMT in CEQA documents for analyzing transportation impacts is not required.

As noted above, the intent of the use of VMT in CEQA documents was to change the way transportation impacts are analyzed. The legislation never discussed or intended the use of VMT for topics other than transportation, yet the Costco DEIR relies upon a purported reduction in VMT (see the concerns with the accuracy of the VMT calculations as expressed in the Fehr and Peers analysis and above in this comment letter) by the project to reach less than significant conclusions in air quality, greenhouse gas emissions and energy use without any real quantification of how much fewer emissions or energy would result from a reduction in VMT. The conclusions reached in those topic areas do not follow applicable prescribed guidance from the Placer County Air Pollution Control

District for analyzing a project's air quality and greenhouse gas emissions impacts or other appropriate methodology for determining the significance of impacts, and improperly relies upon the use of VMT; therefore the conclusions reached in the Draft EIR where a purported reduction in VMT has been used to reach a less than significant conclusion are not supported by substantial evidence.

Sincerely,

David Mohlenbrok
Environmental Coordinator
City of Rocklin

Attachment C

ROCKLIN
CALIFORNIA

CITY MEMORANDUM

DATE: July 24, 2018

TO: Marc Mondell, Director of Economic & Community Development

FROM: Dave Palmer, City Engineer

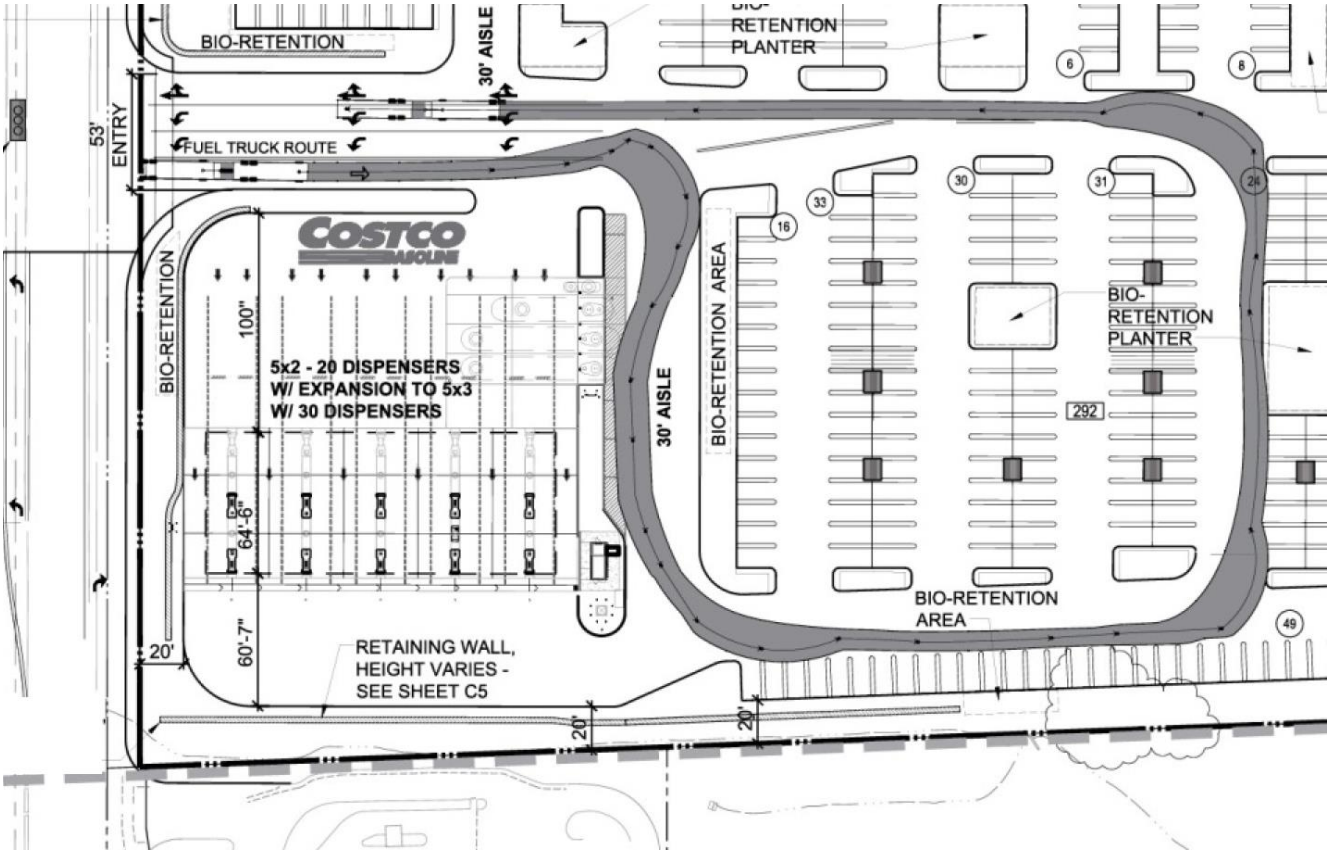
SUBJECT: Loomis Costco Access and Circulation Issues

In my review of the access and circulation aspects of the Loomis Costco I have noticed several areas of concern. The project proposes a main single point of ingress/egress on Sierra College Blvd with a secondary truck access on Brace Road. This single access point, in my opinion, will create a significant amount of traffic congestion both on Sierra College Blvd and within the project's main drive aisle. The proposed fueling station adjacent to the main drive aisle will further add to the congestion. None of the existing Costco stores in this region have this type of constrained access and in fact utilize multiple access points as shown on the attached exhibits. These stores have a combination of long drive aisles and/or access to local streets prior to entering arterial roadways.

The site plan lacks lane configuration details regarding road widening, deceleration lanes and turn pockets on Sierra College Blvd. In addition, the traffic signal proposed at the single access point does not indicate how it would be configured for proposed lanes, future lanes and proposed and future signal phases. The project's proposed signalized access would also significantly restrict access opportunities to the undeveloped 21.4 acre retail parcel located on the west side of Sierra College Blvd opposite the proposed project. The site plan indicates that a limit of approximately 125 ft. of vehicle storage would be available for a northbound left-turn lane at the signalized intersection into the retail parcel.

With regards to mitigation measure TR MM 6, the addition of a second northbound left turn lane (dual lefts) at the Sierra College Blvd/I-80 WB ramps intersection. This mitigation measure would most likely be infeasible within the existing roadway; however, cooperation amongst the other jurisdictions regarding acquisition of additional right of way, encroachment permits, etc. could make it implementable. Additional analysis should be performed to determine required lane configurations, relocation of facilities, required right of way acquisition and engineered cost estimate before any final determination is made.


BRACE ROAD
SIERRA COLLEGE BLVD
CITY OF ROCKLIN
TOWN OF LOOMIS
COSTCO WHOLESALE
COSTCO
HOMEWOOD LUMBER
EXISTING TRAFFIC SIGNAL
20' LANDSCAPE SETBACK
ADDITIONAL RIGHT OF WAY DEDICATION
40' ENTRY
BIO-RETENTION AREA
(E) ACCESS EASEMENT
EXISTING APARTMENTS
ACCESS TO (E) APARTMENTS
SCREENWALL
BIO-RETENTION AREAS
30' AISLE
VACANT PROPERTY
ADDITIONAL RIGHT OF WAY DEDICATION
RETAINING WALL, HEIGHT VARIES - SEE SHEET C5
EXISTING OFFICE AREA
SCREENWALL
COMPACTORS
TRANSFORMER
LOADING
TIRE CENTER
LOCATION OF DISPLAY VEHICLE FOR ON-LINE SALES
LOCATION OF TEMPORARY SEASONAL SALES (4 12' PARKING STALLS)
ENTRANCE
CART CORRAL, TYP.
EXISTING RESIDENTIAL
RETAINING WALL, HEIGHT VARIES
ADA RAMP
ACCESSIBLE PATH OF TRAVEL
Accessible Path of Travel
BIO-RETENTION PLANTER
BIO-RETENTION
FUEL TRUCK ROUTE
PROPOSED TRAFFIC SIGNAL
TOWN OF LOOMIS BOUNDARY
VACANT PROPERTY (FUTURE COMMERCIAL)
5x2 - 10 DISPENSERS W/ EXPANSION TO 6x2 W/ 30 DISPENSERS
BIO-RETENTION AREA
RETAINING WALL, HEIGHT VARIES - SEE SHEET C5
TOWN OF LOOMIS BOUNDARY

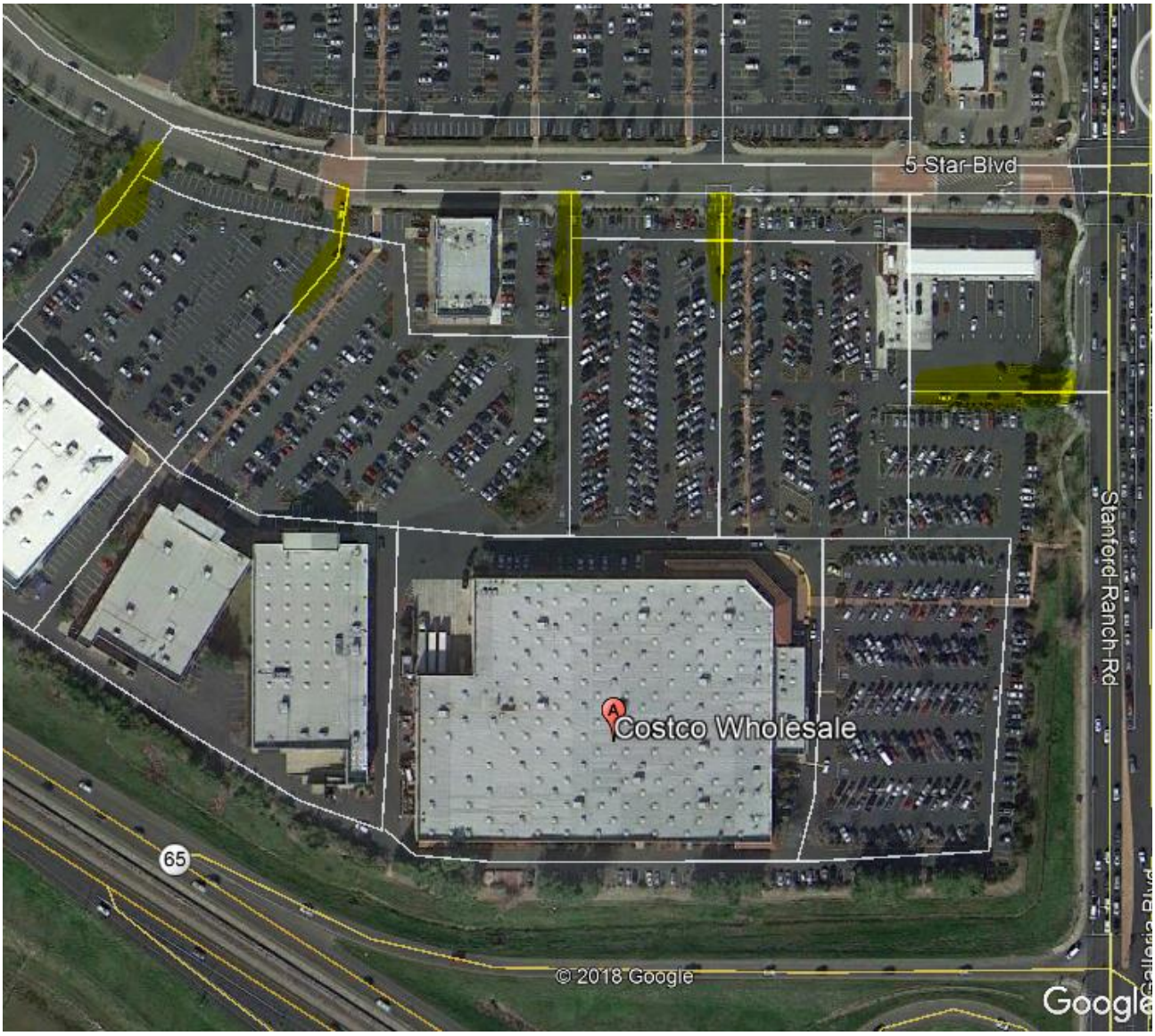


No other Costco in the region has as limited of an entry and all who have traveled within their vicinity would say that significant congestion is still experienced as they get in close proximity to these sites despite the presence of multiple driveways.

Please refer to the details noted on the following pages regarding the configuration of Costco sites in Roseville, Citrus Heights, Folsom and Sacramento as a comparison.

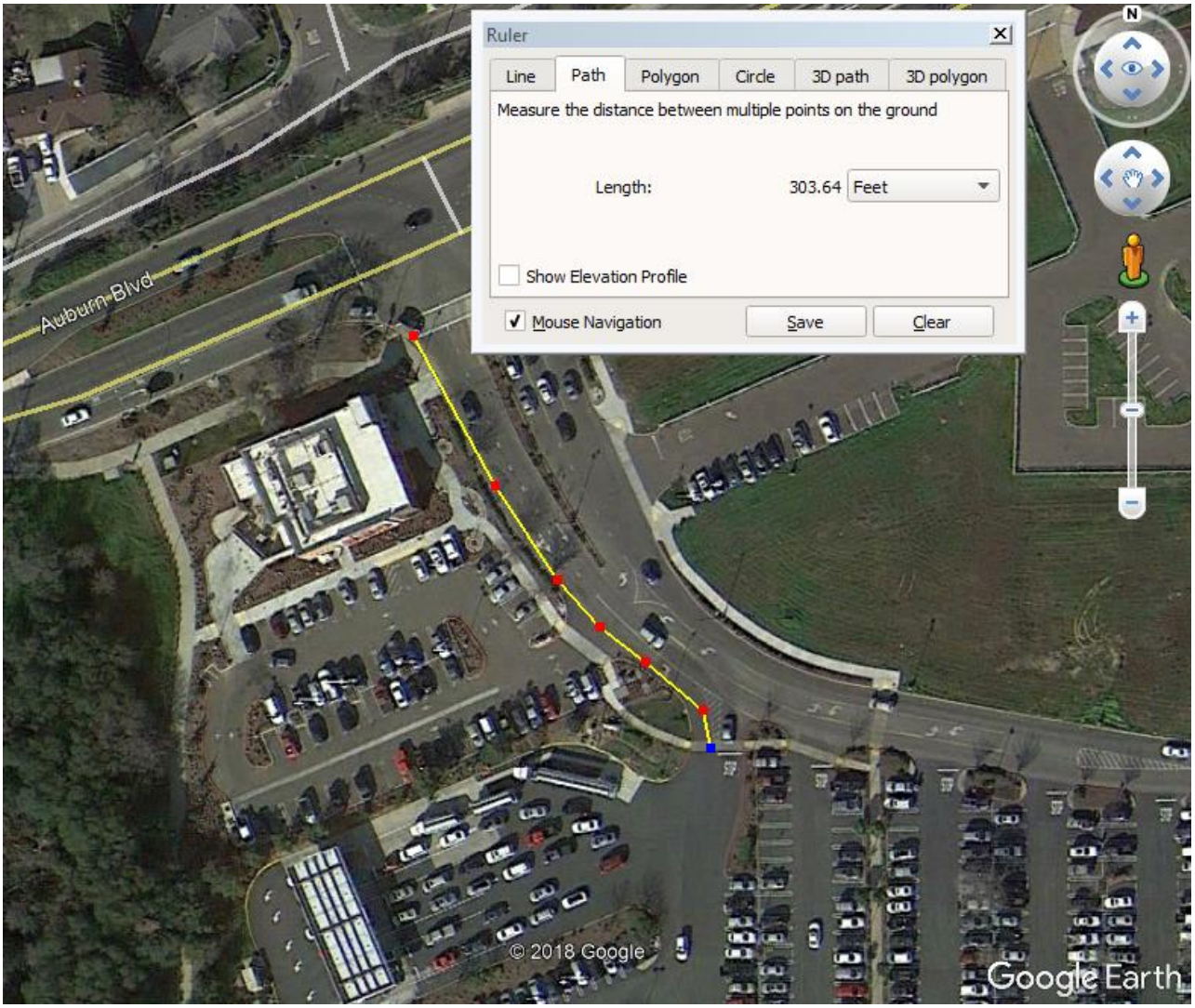
Roseville Costco

The Roseville Costco has no less than 3 driveways directly into that site that are also dispersed along two different street frontages. The Roseville site is also arguably served by at least two other driveways on adjacent commercial properties creating a total of 5 points of access.



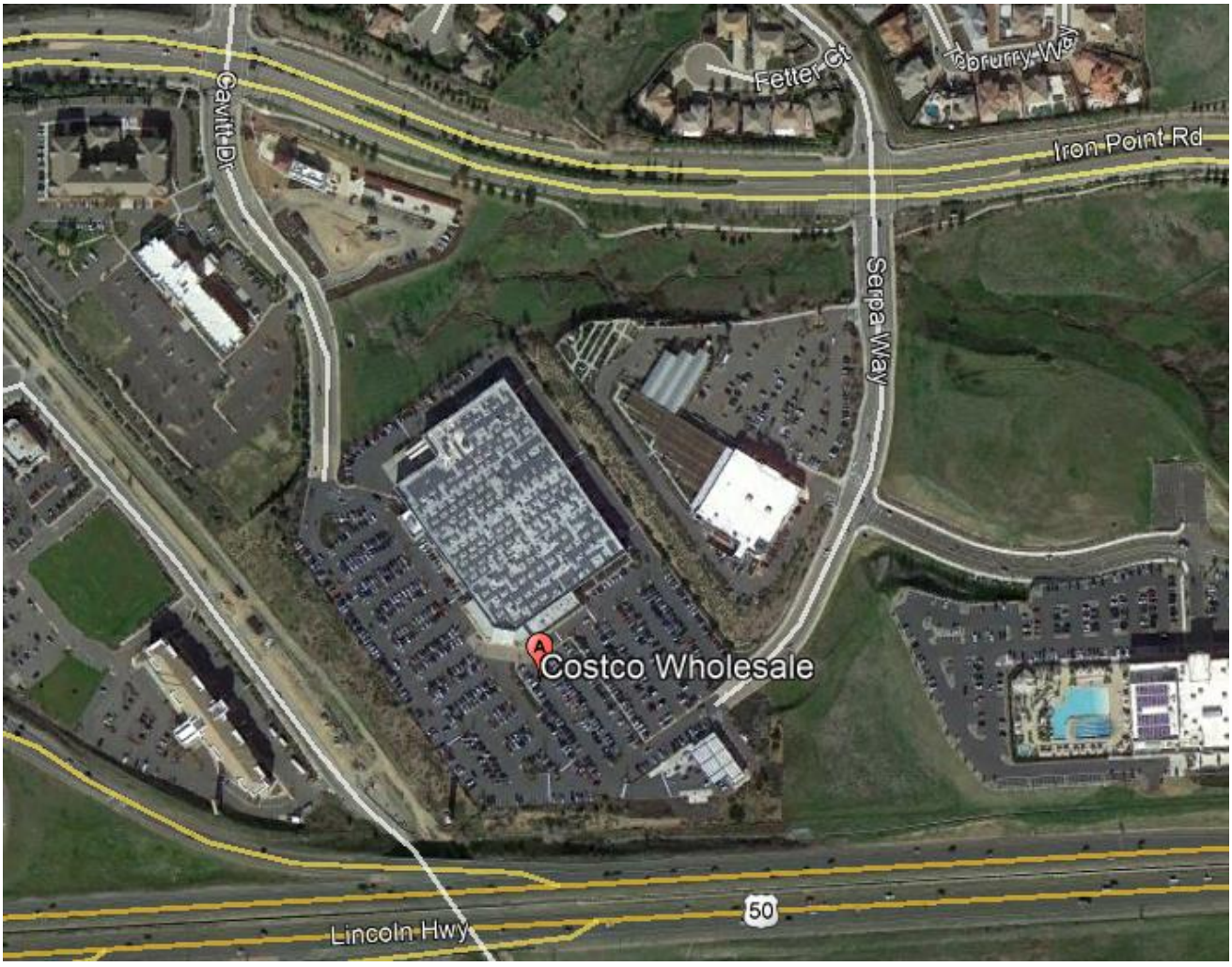
Citrus Heights Costco

The Costco in Citrus Heights has one main entry in with two entry lanes as opposed to one and significantly more distance before reaching the fueling facility entrance (i.e., 300 +/- feet at the Citrus Heights Costco prior to reaching the entrance into the fuel drive versus 160 feet +/- at the proposed Loomis Costco before reaching the entrance into the fuel drive). There are also two other secondary driveways into the center where the Costco in Citrus Heights is located that people can use to both enter and exit.



Folsom Costco

The Costco in Folsom has two points of entry and egress with very long drives (Cavitt Drive and Serpa Way) into the site which keeps traffic from backing up onto the main arterial (Iron Point Road).



Sacramento Costco

Similar to Folsom, the Costco in Sacramento has two long entry roads (Canterbury Road and Expo Parkway) that provide access and keep traffic entering into the site from backing up onto SR 160 and Exposition Boulevard.

Attachment D

v) Granite Drive Traffic Signal

A traffic signal shall be installed at the intersection of Granite Drive and the primary entry to the project on Granite Drive (i.e. the southerly most driveway).

vi) Bus Turnout on Granite Drive

A bus turnout shall be provided at the signalized intersection of the project entry and Granite Drive.

h. For the following off-site improvements in the Town of Loomis, the project developer shall attempt, in good faith, to enter into an agreement with the Town of Loomis by which the developer either shall be responsible for constructing the improvements as required or shall provide to the Town of Loomis funding in an amount equal to the agreed upon estimated fair share cost of the improvements as required for those improvements requiring a fair share contribution:

i) Sierra College Boulevard / Taylor Road

An additional westbound left-turn lane (resulting in dual left-turn lanes) shall be added at the intersection of Sierra College Boulevard and Taylor Road. The dual westbound left turn lanes can be accommodated within the existing right-of-way by restriping the exclusive westbound through and right-turn lanes into a shared through-right lane.

ii) Sierra College Boulevard / Brace Road

A second through lane shall be added on Sierra College Boulevard in both the northbound and southbound directions for 300 feet from the intersection with Brace Road plus taper lanes in both the northbound and southbound directions for an additional 300 feet.

iii) Sierra College Boulevard / Granite Drive

A second through lane shall be added on Sierra College Boulevard in both the northbound and southbound directions for 300 feet from the intersection with Granite Drive plus taper lanes in both the northbound and southbound direction for an additional 300 feet. A portion of the northbound taper lane to be constructed is in the Town of Loomis.

iv) Horseshoe Bar Road/Taylor Road

A northbound right-turn lane from Taylor Road to Horseshoe Bar Road shall be striped at the intersection of Taylor Road and Horseshoe Bar Road.

v) Barton Road and Rocklin Road

The developer shall pay their fair share to the signalization of the intersection of Barton Road and Rocklin Road.

i. For the following off-site improvements in the County of Placer, the project developer shall attempt, in good faith, to enter into an agreement with the County of Placer by which the developer either shall be responsible for constructing the improvements as required or shall provide to the County of Placer funding in an amount equal to the agreed upon estimated fair share cost of the improvements:

i) Sierra College Boulevard / English Colony Way

The developer shall pay their fair share to the signalization of the intersection of Sierra College Boulevard and English

j. An access easement, or its legal equivalent in a form acceptable to the City Attorney, benefitting the adjoining properties to the north (APN # 145-041-018, 019, & 020) shall be recorded over the project site. Said access easement shall become effective only upon the City granting development entitlements for the referenced adjoining properties. (CITY ATTORNEY, ENGINEERING)

k. Provisions for dust control, re-vegetation of disturbed areas, air quality mitigation requirements, and erosion control, in conformance with the requirements of the City of Rocklin, including but not limited to the following (which shall be included in the project notes on the improvement plans):

i) Prior to commencement of grading, the developer shall submit a Construction Emission / Dust Control Plan for approval by the Community Development Director and the Placer County Air Pollution Control District. This plan must address how the project meets the minimum requirements of sections 300 and 400 of Rule 228-Fugitive Dust.

iv) The driveway aisle along the rear of Buildings A-G shall be posted with signage stating "KEEP CLEAR AT ALL TIMES." The number and locations of signs shall be determined by the Fire Department.

v) The parking field shall be posted with signage that reads, "NO OVERNIGHT CAMPING PERMITTED ON PREMISES. VIOLATORS WILL BE CITED PER ROCKLIN MUNICIPAL CODE SECTION 10.24.230."

g. The following off-site improvements:

i) The detention basin as shown on Exhibit A.

ii) An additional westbound through lane (resulting in two through lanes on Rocklin Road) at the intersection of Rocklin Road and Sierra College Boulevard.

iii) The developer shall be responsible for adding a northbound right turn overlap phase, which includes modification of the signal phasing and addition of a new signal head that shows a "right-turn arrow," to the intersection of Rocklin Road and Pacific Street.

iv) The developer shall create an additional westbound right-turn lane by restriping the westbound approach at the intersection of Sierra College Boulevard and King Road in the Town of Loomis, provided that the developer can obtain an encroachment permit from the Town of Loomis such that construction of the contemplated improvements will occur within a reasonable period of time.

In order to implement this condition, the developer shall attempt, in good faith, to enter into an agreement with the Town of Loomis by which the developer either shall be responsible for constructing the improvements at issue or shall provide the Town of Loomis with funding in an amount equal to the agreed upon estimated cost of the improvements.

v) The developer shall be responsible for paying the Town of Loomis its fair share of the costs of constructing a westbound left-turn lane (resulting in dual left-turn lanes) and an eastbound right turn overlap phase for the intersection of Sierra College Boulevard and Taylor Road in the Town of Loomis.

In order to implement this condition, the project developer shall attempt, in good faith, to enter into an agreement with the Town of Loomis by which the developer shall be responsible for providing to

Loomis funds representing the project's fair share of the estimated cost of the constructing the improvements at issue, as agreed to by Loomis, but only in the event that the Town of Loomis can demonstrate within a reasonable period of time (i.e., prior to the issuance of occupancy permits) that Loomis has a fee collection system such that a fair share payment from the project applicant will actually result in construction of the contemplated improvements.

vi) The project developer shall be responsible for paying the Town of Loomis its fair share of the costs of constructing the signalization of the intersection of Barton Road and Rocklin Road in the Town of Loomis.

In order to implement this condition, the project applicant shall attempt, in good faith, to enter into an agreement with the Town of Loomis by which the applicant shall be responsible for providing to Loomis funds representing the project's fair share of the estimated cost of the signalization as agreed to by Loomis, but only in the event that the Town of Loomis can demonstrate within a reasonable period of time (i.e., prior to the issuance of occupancy permits) that Loomis has a fee collection system such that a fair share payment from the project applicant will actually result in such signalization.

vii) The project applicant shall be responsible for paying to Placer County its fair share of the cost of the signalization of the intersection of Sierra College Boulevard and English Colony Way in Placer County.

In order to implement this condition, the project developer shall attempt, in good faith, to enter into an agreement with the County of Placer by which the developer shall be responsible for providing to the County funds representing the project's fair share of the estimated cost of the signalization as agreed to by the County, but only in the event that the County can demonstrate within a reasonable period of time (i.e., prior to the issuance of occupancy permits) that the County has a fee collection system such that a fair share payment from the project applicant will actually result in such signalization.

h. Temporary construction fencing shall be erected around the wetland resources located off site on the adjoining property to the north and east of the detention basin, prior to the commencement of construction of the Rocklin Crossings, unless construction has already commenced on the adjoining site at that time.

Existing Plus Project. Traffic volumes generated by the proposed project were added to the existing traffic volumes and LOS were calculated for the existing plus project scenario. Construction of the project will follow construction of other previously approved projects in the study area, specifically the redesign of the I-80 interchange with Sierra College Boulevard. Therefore the existing plus project conditions are not the real-world physical condition (where the project will be constructed before other approved projects in the region) that the project will affect. However, an existing plus project condition has nevertheless been analyzed for disclosure purposes. The existing plus project weekday and Saturday peak-hour traffic volumes are illustrated in Figures 4.7-6 and 4.7-7. The LOS for study area intersections and roadway segments in the existing plus project scenario is shown in Tables 4.7-5 and 4.7-6. The existing plus project LOS worksheets are provided in Appendix E.

As shown in Table 4.7-5, the following four intersections are forecasted to operate at unsatisfactory LOS in the Existing Plus Project scenario:

- Rocklin Road/Pacific Street
- Sierra College Boulevard/Taylor Road (Loomis)
- Sierra College Boulevard/Rocklin Road
- Horseshoe Bar Road/Taylor Road (Loomis)

The project would have a significant impact on the intersections of Sierra College Boulevard/Taylor Road and Sierra College Boulevard/Rocklin Road in the existing plus project condition. The project impact at the intersections of Rocklin Road/Pacific Street and Horseshoe Bar Road/Taylor Road is less than 5 percent (0.05) of the total intersection volume-to-capacity ratio and therefore not a significant impact.

As shown in Table 4.7-6, most of the study area roadway segments are forecast to operate within their daily roadway capacities in the Existing Plus Project conditions except for the following four segments:

- Taylor Road between King Road and Horseshoe Bar Road (Loomis)
- Taylor Road between Horseshoe Bar Road and Sierra College Boulevard (Loomis)
- Sierra College Boulevard between Taylor Road and I-80
- Sierra College Boulevard between Dominguez and Rocklin Road

A directional peak-hour roadway segment analysis was prepared for these four segments and is shown in Table 4.7-7 (Appendix E). In both a.m. and p.m. peak hours, the four affected roadway segments will operate at LOS A or B; because the roadway segments will operate with satisfactory LOS during the peak hour of roadway traffic, they are not considered impacted by the project.

Similar to the previous scenarios, these segments will exceed the daily capacity in the existing plus approved projects (baseline) plus project scenario. In both the a.m. and p.m. peak hours, however, seven of the eight roadway segments are forecast to operate with satisfactory v/c ratios in both peak hours with project conditions, as shown in Table 4.7-11. Therefore, the project does not cause a significant impact on those seven roadway segments. However, southbound Sierra College Boulevard between Dominguez Road and Rocklin Road is expected to operate at LOS D in the p.m. peak hour if the proposed project and other approved projects were constructed while this roadway is a two-lane collector.

4.7.4 Impacts and Mitigation

TC-1: Rocklin Road/Granite Drive. *The addition of project-related traffic to baseline traffic volumes would degrade traffic operations at the already-deficient intersection, which is operating at LOS E during the p.m. peak hour in the existing plus approved projects (baseline) condition. Because this intersection already operates unacceptably and the project's contribution would be greater than 5 percent, this impact would be considered* ***potentially significant.***

Mitigation Measure TC-1 Rocklin Road/Granite Drive.

The project applicant shall be responsible for converting the existing southbound right turn lane (Granite Drive) to a free right turn, by restriping the departure lane (west leg) along Rocklin Road to accommodate the receiving pocket for the right turning vehicles. In addition, the project applicants shall stripe a median island which will separate the turning traffic (southbound right along Granite Drive) from the through traffic (westbound through along Rocklin Road) and restripe a portion of Rocklin Road (west leg) to accommodate two 12 foot through lanes in each direction, a 12 foot median lane, one 4 foot bike lane in each direction and an acceleration lane (in the westbound direction) for vehicles turning right (from southbound Granite Drive) onto Rocklin Road. Based on the current posted speed limit (35 mph) along Rocklin Road a 250 foot acceleration lane and a 250 foot transition is required which can be accommodated within the existing pavement along Rocklin Road.

Level of Significance after Mitigation

With the implementation of the identified mitigation measure, the project's direct incremental impact would be mitigated (v/c reduced from 0.985 to 0.894 and LOS reduced from E to D) and this impact would be considered ***less-than-significant.***

TC-2: Sierra College Boulevard/Taylor Road (Loomis). *The addition of project-related traffic to baseline traffic volumes would degrade traffic operations at the already-deficient Sierra College Boulevard/Taylor Road (Loomis) intersection, which is operating at LOS D during the a.m. peak hour and LOS F during the p.m. peak hour in the existing plus approved projects (baseline) condition. Because this intersection already operates unacceptably and the project's contribution would be greater than 5 percent, in the a.m. and p.m. peak hour*

and the project also degrades the LOS at this intersection from LOS C to LOS D during the Saturday peak hour, the project's impacts on this intersection would be considered ***potentially significant.***

Mitigation Measure TC-2: Improvements to Sierra College Boulevard/Taylor Road (Loomis).

The project applicant shall be responsible for adding a westbound left-turn lane (resulting in dual left-turn lanes). The dual westbound left-turn lanes can be accommodated within the existing right-of-way by restriping the exclusive westbound through lane to a left-turn lane and by restriping the exclusive right-turn lane to a combined through/right-turn lane.

In order to implement this measure, the project applicant shall attempt, in good faith, to enter into an agreement with the Town of Loomis by which the applicant either shall be responsible for constructing the improvements at issue or shall provide to the Town of Loomis with funding in an amount equal to the agreed upon estimated cost of the improvements.

Level of Significance after Mitigation

In correspondence with the City, the Town of Loomis has preliminarily indicated a willingness to cooperate with the City in implementing improvements at this intersection, but has stopped short of agreeing to the specific improvements described above, which reflect the best professional judgment of the City and its traffic engineering consultants. The City is hopeful, though not certain, that Loomis will ultimately agree to install these improvements (though at the expense of the project applicant).

With the implementation of the identified mitigation measure, the project's direct incremental impact would be mitigated (1.211 v/c reduced to 1.084 in the pm and 0.891 v/c reduced to 0.792 Saturday)and this impact would be considered ***less-than-significant.*** Because the Town of Loomis controls what occurs at the intersection, however, the City conservatively concludes that, at the time of action by its City Council, the impact would be treated as ***significant and unavoidable,*** given that the City has no control over Loomis and thus cannot take for granted that the improvements contemplated by the mitigation will be constructed. Furthermore, although Mitigation Measure TC-2 requires the applicant to try to enter into an agreement with Loomis by which the applicant will be responsible for the improvements, the City has no way to ensure that Loomis will cooperate with the applicant pursuant to that measure. An agreement requires two cooperating parties, and the City cannot force Loomis to cooperate if it chooses not to do so. For these reasons, consistent with CEQA Guidelines section 15091, subdivision (a)(2), the City concludes that Loomis can and should cooperate with the City in implementing the mitigation. With such action by Loomis, the impact of the project would be rendered less than significant, though at present, as noted above, the City considers the impact ***significant and unavoidable.***

TC-3: Sierra College Boulevard/Brace Road (Loomis). *The addition of project-related traffic to baseline traffic volumes would degrade traffic operations at the Sierra College Boulevard/Brace Road (Loomis) intersection from an already deficient LOS D during the p.m. peak hour to LOS F and from an acceptable LOS A during the Saturday peak hour to LOS D . Therefore, the project's impacts on this intersection would be considered* ***potentially significant.***

Mitigation Measure TC-3 Sierra College Boulevard/Brace Road (Loomis).

The project applicant shall be responsible for adding a second through lane on Sierra College Boulevard in both the northbound and southbound directions for 300 feet from the intersection with Brace Road plus taper lanes in both the northbound and southbound directions for an additional 300 feet.

In order to implement this measure, the project applicant shall attempt, in good faith, to enter into an agreement with the Town of Loomis by which the applicant either shall be responsible for constructing the improvements at issue or shall provide to the Town of Loomis with funding in an amount equal to the agreed upon estimated cost of the improvements.

Level of Significance after Mitigation

With the implementation of the identified mitigation measure, the intersection would operate at an acceptable LOS A on Saturday and LOS B in the pm peak hour and this impact would be considered ***less-than-significant.*** Because the Town of Loomis controls what occurs at the intersection, however, the City conservatively concludes that, at the time of action by its City Council, the impact would be treated as ***significant and unavoidable***, given that the City has no control over Loomis and thus cannot take for granted that the improvements contemplated by the mitigation will be constructed. Furthermore, although Mitigation Measure TC-3 requires the applicant to try to enter into an agreement with Loomis by which the applicant will be responsible for the improvements or will make fair share payments to the Town of Loomis, the City has no way to ensure that Loomis will cooperate with the applicant pursuant to that measure. An agreement requires two cooperating parties, and the City cannot force Loomis to cooperate if it chooses not to do so. For these reasons, consistent with CEQA Guidelines section 15091, subdivision (a)(2), the City concludes that Loomis can and should cooperate with the City in implementing the mitigation. With such action by Loomis, the impact of the project would be rendered less than significant, though at present, as noted above, the City considers the impact ***significant and unavoidable.***

TC-4: Sierra College Boulevard/Granite Drive. *The addition of project-related traffic to baseline traffic volumes would degrade traffic operations at the already deficient Sierra College Boulevard/Granite Drive intersection, which is operating at a LOS of F during the p.m. peak and LOS E during the Saturday peak hours in the existing plus approved projects (baseline) condition. Because this intersection already operates unacceptably and the project's contribution would be greater than 5 percent, this impact would be considered* ***potentially significant.***

Mitigation Measure TC-4 Sierra College Boulevard/Granite Drive.

The project applicant shall be responsible for adding a second through lane on Sierra College Boulevard in both the northbound and southbound directions for 300 feet from the intersection with Granite Drive plus taper lanes in both the northbound and southbound direction for an additional 300 feet. A portion of the northbound taper lane to be constructed is in the Town of Loomis.
For the portion of the improvements required to be implemented within the Town of Loomis, the project applicant shall attempt, in good faith, to enter into an agreement with the Town of Loomis by which the applicant either shall be responsible for constructing the improvements at issue or shall

provide to the Town of Loomis with funding in an amount equal to the agreed upon estimated cost of the improvements.

Level of Significance after Mitigation
The southbound through lane can be implemented with restriping of existing pavement only. The existing "right turn only" lane would be converted to a shared "through/right turn" lane and there is existing improvement on the south side of the intersection to accept the second through lane. The second northbound through lane can be implemented within existing pavement on the south side of the intersection. On the north side there is sufficient pavement for about 300 feet; however, there is not sufficient pavement for a transition from two lanes to one. This would require at least 300 feet of additional improvement. With the implementation of the identified mitigation measure, the project's direct incremental impact is mitigated (1.206 v/c reduced to 0.853 pm and 1.218 v/c reduced to 0.907 Saturday) and this impact would be considered ***less-than-significant.***

Because the Town of Loomis partially controls what occurs at a section of the north leg along Sierra College Boulevard through the Town of Loomis, however, the City conservatively concludes that, at the time of action by its City Council, the impact would be treated as ***significant and unavoidable***, given that the City has no control over Loomis and thus cannot take for granted that the improvements contemplated by the mitigation will be constructed. Furthermore, although Mitigation Measure TC-4 requires the applicant to try to enter into an agreement with Loomis by which the applicant by which the applicant will be responsible for the improvements, the City has no way to ensure that Loomis will cooperate with the applicant pursuant to that measure. An agreement requires two cooperating parties, and the City cannot force Loomis to cooperate if it chooses not to do so. For these reasons, consistent with CEQA Guidelines section 15091, subdivision (a)(2), the City concludes that Loomis can and should cooperate with the City in implementing the mitigation. With such action by Loomis, the impact of the project would be rendered less than significant, though at present, as noted above, the City considers the impact ***significant and unavoidable***.

TC-5: Sierra College Boulevard/Rocklin Road. *The addition of project-related traffic to baseline traffic volumes would degrade traffic operations at the already-deficient Sierra College Boulevard/Rocklin Road intersection, which is operating at LOS F during the p.m. and Saturday peak hours in the existing plus approved projects (baseline) condition. Because this intersection already operates unacceptably and the project's contribution would be greater than 5 percent, this impact would be considered* ***potentially significant.***

Mitigation Measure TC-5 Sierra College Boulevard/Rocklin Road.

The project applicant shall be responsible for the construction of an additional northbound left-turn lane (resulting in dual left-turn lanes) and shall be responsible for the Project's fair share of construction of an exclusive southbound right-turn lane at this intersection which will mitigate the p.m. peak hour and Saturday midday peak hour. The project applicant shall pay its Traffic Impact fees (including applicable SPRTA fees) as mandated as the Project's fair share contributions to the construction of the Sierra College Boulevard Widening Project, consistent with the City's CIP.

Level of Significance after Mitigation

The proposed project would be conditioned to contribute its fair share to the cost of circulation improvements via the SPRTA fee and the City's TIM fee. The SPRTA is a Joint Powers Authority (JPA) comprised of the Cities of Lincoln, Rocklin, Roseville and the County of Placer. The SPRTA was formed for the purpose of implementing a regional transportation and air quality mitigation fee to fund specified regional transportation projects. The Placer County Transportation Planning Agency (PCTPA) is designated as the entity to provide administrative, accounting, and staffing support for the SPRTA. PCTPA adopted a Regional Transportation Funding Strategy in August 2000, which included the development of a regional transportation impact fee program and a mechanism to implement the impact fee. The Sierra College Boulevard Widening Project, one of the many improvement projects identified by SPRTA, currently in the final design stage by the City of Rocklin.

Because the City TIM fee and SPRTA fee programs are reasonable mitigation plans pursuant to which fair share payments can be depended upon to result in the eventual construction of the improvements at issue and the operation of the segment at issue at an acceptable LOS A, the project's impacts on the portion of Sierra College Boulevard within the City of Rocklin would be considered ***less-than-significant*** after mitigation.

TC-6: Horseshoe Bar Road/Taylor Road (Loomis). *The addition of project-related traffic to baseline traffic volumes would degrade traffic operations at the already-deficient Horseshoe Bar Road/Taylor Road (Loomis) intersection which is operating at LOS E with a volume to capacity ratio of 0.956 during the p.m. peak hour in the existing plus approved projects (baseline) condition. The intersection will operate at LOS F with a v/c ratio of 1.008 after the addition of project traffic. Because this intersection already operates unacceptably and the project's contribution would be greater than 5 percent, this impact would be considered* ***potentially significant.***

Mitigation Measure TC-6 Horseshoe Bar Road/Taylor Road (Loomis).

The project applicant shall be responsible for the creation (restriping) of an additional northbound right-turn lane from Taylor Road to Horseshoe Bar Road within the Town of Loomis.

In order to implement this measure, the project applicant shall attempt, in good faith, to enter into an agreement with the Town of Loomis by which the applicant either shall be responsible for constructing the improvements at issue or shall provide to the Town of Loomis with funding in an amount equal to the agreed upon estimated cost of the improvements.

Level of Significance after Mitigation

The identified mitigation would formalize an exclusive right turn lane increasing capacity that does occasionally occur at this time without the striping. The northbound right-turn lane can be accommodated within the existing improvements. On Taylor Road northbound there is a 27 foot curb lane that accommodates a through lane and some on-street parking. Approaching Horseshoe Bar Road the parking could be restricted for about 100 feet before the intersection and a "Right Turn Only" lane striped. Parking for two to three vehicles will be displaced. With the implementation of the identified mitigation measure, the intersection would operate at LOS E with a volume to capacity ratio of 0.921 (lower than without project conditions) and this impact would be considered ***less-than-***

significant. Because the Town of Loomis controls what occurs at the intersection, however, the City conservatively concludes that, at the time of action by its City Council, the impact would be treated as ***significant and unavoidable,*** given that the City has no control over Loomis and thus cannot take for granted that the improvements contemplated by the mitigation will be constructed. Furthermore, although Mitigation Measure TC-6 requires the applicant to try to enter into an agreement with Loomis by which the applicant will be responsible for the improvements, the City has no way to ensure that Loomis will cooperate with the applicant pursuant to that measure. An agreement requires two cooperating parties, and the City cannot force Loomis to cooperate if it chooses not to do so. For these reasons, consistent with CEQA Guidelines section 15091, subdivision (a)(2), the City concludes that Loomis can and should cooperate with the City in implementing the mitigation. With such action by Loomis, the impact of the project would be rendered less than significant, though at present, as noted above, the City considers the impact ***significant and unavoidable.***

TC-7: Roadway Segments Exceedance of LOS Threshold. *The proposed project would cause the roadway segment of southbound Sierra College Boulevard between Dominguez Road to exceed the LOS based on the peak hour directional volume to capacity ratio. Therefore, the project's impact on this roadway segment would be considered* ***potentially significant.***

As shown above, only one roadway segment, southbound Sierra College Boulevard between Dominguez Road (at its point of future connection, as contemplated by the City's General Plan) and Rocklin Road is expected to operate at LOS D in the p.m. peak hour (exceeds LOS criteria) if the proposed project and other approved projects were constructed while this roadway is a two-lane collector. The City has completed preliminary design for the widening of Sierra College Boulevard to four lanes between I-80 and El Don Drive (this segment includes the portion of Sierra College Boulevard between Dominguez Road and Rocklin Road that is affected by the project), and this project is included in the City's Capital Improvement Projects list. The overall Sierra College Boulevard Widening project is broken into two phases – Phase I south of the interchange to El Don Drive (in Rocklin) and Phase II north of the interchange from Granite Drive to Taylor Road (which includes segments in both Rocklin and Loomis). The City is proposing to bid the project in spring 2009, with construction on Phase I beginning in June 2009. City staff indicated that the Phase I portion of the project is fully funded, and staff anticipates four to six month construction duration for Phase I.

Mitigation Measure TC-7: Make Fair Share Contributions to Improvements on Sierra College Boulevard between Dominguez Road and Rocklin Road.

The project applicant shall be responsible for the Project's fair share of the cost of the physical improvements necessary to reduce the severity of the Project's significant transportation-related impacts to the southbound direction of this segment, including the construction of an additional (second) through lane in both the northbound and southbound directions on Sierra College Boulevard. The project applicant shall pay its Traffic Impact fees (including applicable SPRTA fees) as mandated as the Project's fair share contributions to the construction of the Sierra College Boulevard Widening Project, consistent with the City's CIP.

Attachment E

Improvement Agreement

This Agreement is entered into by and between the City of Rocklin, a municipal corporation [Rocklin] and the Town of Loomis, a municipal corporation [Loomis] on the 8th day of April, 2010.

WHEREAS, the Parties desire to perform improvements to repair, upgrade and widen Sierra College Blvd. from Granite Drive to Taylor Road as more fully explained in Section 4 [the Improvements];

NOW, THEREFORE, in consideration of the mutual promises and covenants made below, the parties agreed as follows:

1. Loomis shall contribute up to $519,080 towards the costs of the Improvements;
2. Should the actual cost for the Improvements be less than the total cost of $2,150,000, which is the basis for Loomis' contribution of $519,080, the Loomis contribution shall be reduced by an amount proportionate to their share of the costs savings. Actual cost for the Improvements means the construction contract cost plus Rocklin's documented project management and administration costs as approved by the South Placer Regional Transportation Agency [SPRTA].
3. The Loomis payment for costs of the Improvements shall be made to SPRTA within ten days of the award of the construction contract for the Improvements by Rocklin.
4. Improvements shall be done according to plans prepared by Omni-Means titled Sierra College Boulevard Widening Project, Granite Drive to Taylor Road, Job No. 25-6000-20 and dated 6-4-08 (the "Improvement Plans" that will include, for the benefit of Loomis:

Attachment E

Medians suitable for planting which shall be begin at the Loomis/Rocklin Town limit closest to Granite Drive and continuing to Taylor Road, except at the Brace Road intersection.

Suitable for planting means that the medians will have curbing and drainage, irrigation stubbed out, 1" irrigation main line, 1" meter, electrical conduits, and soil suitable for planting trees and shrubs.

5. Loomis may plant and maintain the medians in any manner it wants.

6. Loomis may, at its cost, work with Omni-Means to incorporate other improvements that Loomis may do with its own or developer funds, for instance, an additional lane and edge improvements from Brace Road to Taylor Road and improvements to the signal light at Brace Road.

7. Rocklin and Loomis officials will issue a joint press release explaining the Sierra College Blvd. improvements and the cooperative endeavor of the two entities to signal the start of new relationship between Rocklin and Loomis.

8. Rocklin will bid the Sierra College Blvd. improvements as shown on the Improvement Plans approved by the Loomis Town Engineer, and will coordinate construction inspection and change orders with the Loomis Town Engineer.

9. Loomis will provide Rocklin with the necessary approvals to allow Rocklin jurisdiction for construction purposes within the Town of Loomis and to provide Rocklin with required encroachment permits.

10. Rocklin and Loomis agree to continue meeting to:

    a. Evaluate improvements and costs to improve Taylor Road either side of Sierra College Blvd., including the Sierra College Blvd./Taylor Road signalized intersection and identify developments that will be contributing to the Taylor Road improvements and costs thereof;

b. Discuss bike way and trail tie-ins between the jurisdictions (e.g. along Secret Ravine through Croftwood routes); and

c. Discuss supporting Rocklin, at PCTPA, in petitioning CalTrans for work on the stretch of I-80 east of Hwy 65. (The sense is that the Roseville bottleneck will simply shift east affecting Rocklin and Loomis. Given that Loomis is going to be working with CalTrans on the bridge raisings (3 in Loomis) this may be an opportunity for Rocklin and Loomis (and PCTPA) to jointly petition CalTrans on I-80 issues that the respective jurisdictions have in common and individually. Rocklin seeks support from Loomis and it is possible that reciprocal support could help achieve things Loomis desires from the bridge raising work).

WHEREFORE, the Parties hereto have executed this Agreement in Placer County on the date first written above.

CITY OF ROCKLIN

By: _____
Carlos A. Urrutia, City Manager

Approved as to Form:

By: _____
Russell A. Hildebrand, City Attorney

ATTEST:

_____
Barbara Ivanusich, City Clerk

Town of Loomis Signatures Next Page

TOWN OF LOOMIS

By: _____
Perry Beck, Town Manager

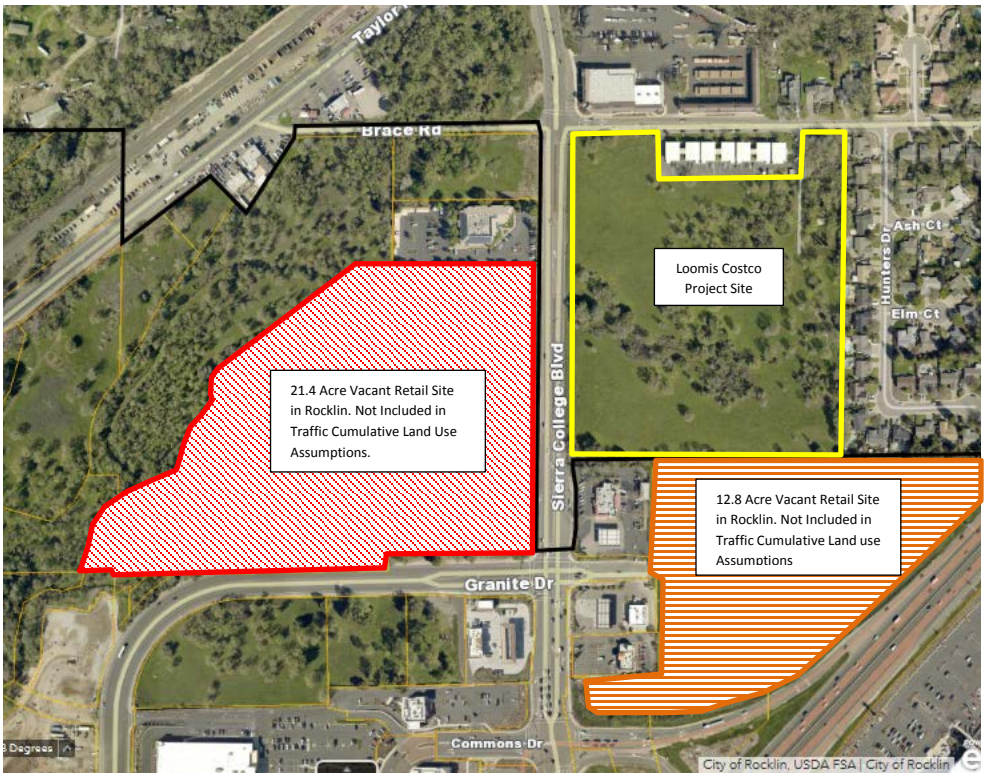
Approved as to Form:

By: _____
David J. Larsen, Town Attorney

ATTEST:

_____
Crickett Strock, Town Clerk

Attachment F



Attachment F

Attachment G

INVESTOR RELATIONS CORPORATE PROFILE Shop costco.com >>

Costco Wholesale Corporation operates an international chain of membership warehouses, mainly under the "Costco Wholesale" name, that carry quality, brand name merchandise at substantially lower prices than are typically found at conventional wholesale or retail sources. The warehouses are designed to help small-to-medium-sized businesses reduce costs in purchasing for resale and for everyday business use. Individuals may also purchase for their personal needs.

Costco's warehouses present one of the largest and most exclusive product category selections to be found under a single roof. Categories include groceries, candy, appliances, television and media, automotive supplies, tires, toys, hardware, sporting goods, jewelry, watches, cameras, books, housewares, apparel, health and beauty aids, tobacco, furniture, office supplies and office equipment. Costco is known for carrying top quality national and regional brands, with 100% satisfaction guaranteed, at prices consistently below traditional wholesale or retail outlets.

Members can also shop for private label Kirkland Signature™ products, designed to be of equal or better quality than national brands, including juice, cookies, coffee, housewares, luggage, clothing and detergent. The Company also operates self-service gasoline stations at a number of its U.S., Canada, Australia, Japan, United Kingdom, Spain, Mexico, Taiwan, and Iceland locations.

Additionally, Costco Wholesale Industries, a division of the Company, operates manufacturing businesses, including special food packaging, optical laboratories, meat processing and jewelry distribution. These businesses have a common goal of providing members with high quality products at substantially lower prices.

According to Craig Jelinek, the Company's President, CEO and Director, "Costco is able to offer lower prices and better values by eliminating virtually all the frills and costs historically associated with conventional wholesalers and retailers, including salespeople, fancy buildings, delivery, billing and accounts receivable. We run a tight operation with extremely low overhead which enables us to pass on dramatic savings to our members."

Costco is open only to members and offers three types of membership: Executive, Business and Gold Star. Executive Members are offered additional savings on Costco Services such as auto and home insurance, Costco Auto Program, check printing, identity protection, payment processing, bottled water delivery, and payroll services. Executive Members in the U.S earn an annual 2% Reward (up to $1,000) on qualified Costco purchases. All types of membership include one free Household Card. Costco membership cards are accepted at Costco locations worldwide and online at Costco.com.

Business Members qualify by owning or operating a business, and pay an annual fee ($60 in the U.S.) to shop for resale, business and personal use. This fee includes one free Household Card. Business members may purchase up to six additional membership cards ($60 each) for partners or associates in the business.

Gold Star Members pay an $60 annual fee (in the U.S.), to shop for personal use. Individuals who don't own a business may sign up for a Gold Star Membership. This fee includes one free Household Card.

Costco warehouses generally are open seven days per week for all members.

Costco is a Washington corporation, publicly traded under the Nasdaq ticker symbol "COST", with its home office in Issaquah, Washington.

A more complete description of the Company and its business is contained in the Company's periodic filings with the Securities and Exchange Commission.

Key Information

Number of warehouses:	753 (as of 7/19/18)
Areas of operation:	523 locations in 44 U.S. States & Puerto Rico; 98 locations in nine Canadian provinces; 28 locations in the United Kingdom; 13 locations in Taiwan; 14 locations in Korea; 26 locations in Japan; 9 locations in Australia; 38 locations in Mexico; 2 locations in Spain 1 location in Iceland 1 location in France
Membership Data (as of 5/13/18):	93.0 million cardholders 50.9 million households 40.0 million Gold Star 7.5 million Business 3.3 million Business add ons
Warehouse sizes:	73,000 to 205,000 square feet (average 144,500 square feet)
Annual revenues (FY17 - Ended 9/3/17):	$126.2 billion

Fiscal year end:	Sunday closest to August 31
Number of U.S. employees:	163,000 full and part-time
Number of employees (worldwide):	239,000 full and part-time