

Hagen, Jennifer

From: Mike Singh <[REDACTED]>
Sent: Wednesday, June 14, 2023 5:53 AM
To: Web Planning Division
Subject: Concerns Regarding the Proposed Costco Store and Gas Station

CAUTION – EXTERNAL SENDER

Dear Planning Commission of the City of Brentwood,

I am writing to express my concerns and share the sentiments of many residents in the area and nearby communities (like Cielo, Aviano etc) regarding the proposed Costco store and accompanying gas station in our neighborhood. While we recognize the potential benefits such an establishment can bring, there are several significant factors that need to be taken into consideration.

First and foremost, the issue of heavy traffic deserves careful attention. The introduction of a Costco store and gas station is likely to attract a substantial increase in vehicular activity, exacerbating the already congested roads in the area. This heightened traffic could negatively impact the daily lives of residents, hamper local businesses, and create safety concerns for pedestrians and cyclists. Measures must be implemented to mitigate these traffic-related challenges and ensure the well-being and accessibility of all community members.

Furthermore, the proposed gas station raises serious health concerns, particularly for young families residing in the area. Toddlers and young children are particularly susceptible to the adverse effects of air pollution, and the emissions generated by a gas station in close proximity to residential areas could pose a threat to their well-being. It is vital that comprehensive studies be conducted to assess the potential health risks and implement appropriate mitigation strategies to safeguard the youngest members of our community.

Additionally, the proposed Costco store and gas station would introduce a heavy footprint in close proximity to a quiet residential area. This would undoubtedly disrupt the tranquility and peaceful living environment enjoyed by those residing in the vicinity. It is crucial to consider the potential impact on property values, noise pollution, and the overall quality of life for the residents who have chosen this area for its peaceful ambiance.

In conclusion, while we acknowledge the potential economic benefits and convenience a Costco store may offer, we urge you to carefully evaluate and address the concerns raised by heavy traffic, the potential health impacts on young families, and the disturbance to the residential tranquility. It is essential that comprehensive measures be put in place to mitigate these concerns and ensure the well-being and harmony of our community.

Thank you for your attention to these matters, and we trust that you will consider the best interests of the residents and the long-term sustainability of our neighborhood in your decision-making process.

Sincerely,
Mike

Hagen, Jennifer

From: Sandi Norona <[REDACTED]>
Sent: Tuesday, June 13, 2023 9:30 PM
To: Web Planning Division
Subject: Costco

CAUTION – EXTERNAL SENDER

Please allow a Costco in Brentwood. It's dangerous going to the one in Antioch. A man followed a woman to her car looking suspicious and luckily a gentleman saw him and went up to the woman and helped her put her merchandise in her car and waited for her to leave. Antioch's crime is worse than it has ever been and it scares me to go there plus there's so much traffic.

Sent from my iPhone

Hagen, Jennifer

From: Kimberly Christian <[REDACTED]>
Sent: Monday, June 12, 2023 7:54 PM
To: Web Planning Division
Subject: Costco

CAUTION – EXTERNAL SENDER

This is horrible and unnecessary! Please stop destroying our community. We have a Costco 15 minutes from Brentwood. Stop inundating us with dollar and discount stores, and swallowing up our open space. We do not need the extra traffic in that area, it is already a nightmare. You want to take traffic from a warehouse district that has hardly any (other than the existing Costco) and bring it to Brentwood, that is full of residential and smaller business, great for Costco not for this community. We do not need more jobs in this town, anyone who makes the kind of money that will be invested back into the community will be commuting anyways. It is a shame that most of us have to and want to shop in other communities because they have nicer, better quality, stores and restaurants. You need travel to a planned community that was well thought out and geared towards a better quality of life, not just profit, the reason so many people are now choosing to leave Brentwood. Make Brentwood a place that people want to come home to and enjoy, not another crowded metropolis.

Sincerely,
Kimberly Christian
Life Long Brentwood Resident

Hagen, Jennifer

From: Bruce Ole Ohlson <[REDACTED]>
Sent: Thursday, September 15, 2022 10:45 PM
To: Bryant, Joel <[REDACTED]>; Ogden, Tim <[REDACTED]>; Kersevan, Steven <[REDACTED]>
<[REDACTED]>
Cc: Delta Pedalers Bicycle Club <[REDACTED]>; Robert Prinz <[REDACTED]>; Bike East Bay Advocacy Department <[REDACTED]>; BEB Advocacy Department <[REDACTED]>
Subject: Costco mitigations

CAUTION – EXTERNAL SENDER

Dear Mayor Bryant and City Manager Ogden,

East County's pedestrian and bicycle community has become aware that Costco has applied to build a new superstore in the northeast corner of Brentwood, just where the communities of Brentwood, Antioch, and Oakley come together. We have no problem with this, but we do request that the City of Brentwood mandate that Costco provide some mitigations that will make the streets and trails safer in the vicinity of the new Costco warehouse superstore and in Brentwood. We don't want to chase Costco away, but it will be hard for them to refuse to provide for the safety of pedestrians and bicyclists in the vicinity of their new store, so we should ask for a lot. Since the traffic generated by the new Costco will impact pedestrians and bicyclists in nearby Antioch and Oakley, we should work with those communities and ask for the construction of mitigations in those communities, too. As you know, Costco is the third largest retailer in the United States. These few, small mitigations for our nonmotorized citizens and residents will cost just a few minutes' worth of the profit that this store will generate.

First in Brentwood, we'd like some dedicated bicycle parking no farther from the store's main entrance than the closest automobile parking spot that is reserved for handicapped parking. We suggest approximately one bicycle parking space for every 40 automobile spaces, or approximately 20 bicycle parking spaces. These spaces should accommodate cargo bicycles and bikes with trailers. Half of these parking spaces should have an outlet incorporated or nearby for the charging of electric bikes and electric scooters. I expect that Costco is planning to be generous with parking spaces that are wired for the charging of electric automobiles, but if not, the City of Brentwood should mandate a significant number of charging stations for electric automobiles. Seventy-five would be a good, round, minimum number, but providing

charging stations for half the automobile parking places that Costco is providing would be best in the long run.

Additionally, we'd like an entrance to the store's parking lot from the Mokelumne Aqueduct Regional Trail, which parallels the store property immediately to the south. We request that infrastructure for bicycles and pedestrians be constructed through the parking lot leading to the bicycle parking racks and to the front door in order to safely and conveniently serve people approaching the store on foot or by bicycle from the trail.

The Mokelumne Aqueduct Regional Trail crosses Heidorn Ranch Road on the west side of the Costco property. We would like to be assured that any segment of the sidewalk of Heidorn Ranch Road upon which the trail runs will be built to trail-width, (10 feet wide). The trail currently crosses Heidorn Ranch Road at the traffic signal with Lone Tree Plaza Drive, but if an additional traffic signal is added to the street as part of this project, please route the trail in a way that is most direct and convenient for the pedestrian or bicyclist remaining on the trail and continuing west. We will want to coordinate with the City of Antioch so that a matching 10 foot sidewalk is built on the Antioch side of Heidorn Ranch Road leading to the trail.

There are already bicycle lanes on Heidorn Ranch Road, but they don't go all the way to the limit line of the intersection with Lone Tree Way. We'd like to see the Heidorn Ranch Road intersection with Lone Tree Way restriped and standard-width bicycle lanes added approaching and departing the limit line. We want the northbound bicycle lane to be placed between the dedicated right-turn lane and the dedicated through-lane. There is space between the curb faces for this, but the existing generous-width traffic lanes will have to be narrowed a bit. Following Heidorn Ranch Road north and then continuing north on Fairside Way in Antioch to the connection with the existing path that runs east/west and eventually follows Country Hills Drive, which has marked bicycle lanes and a wide sidewalk that extends all the way to Laurel Road is an easy and safe connection between the Mokelumne Aqueduct Trail and the Delta de Anza Trail.

We want a connector trail built just along the east side of Highway 4 that will connect the Mokelumne Aqueduct Trail with the Sand Creek Trail.

Also in Brentwood, we want a connector trail built between the Mokelumne Aqueduct Trail and the existing trail that parallels the MoCoCo railroad line and eventually joins with the Marsh Creek Regional Trail. This couple of hundred-yard-long segment of trail will increase the connectivity of our network of bicycle and pedestrian facilities in Brentwood.

The above mitigations are located within the City of Brentwood. I will write up some suggested pedestrian and bicyclist mitigations for both Oakley and Antioch and send them to you under a separate cover.

Far from chasing Costco away, these few and inexpensive mitigations will give them an opportunity to emphasize what good corporate citizens they will be if we allow them to build the proposed store in our community.

Thank you for keeping the safety of our nonmotorized citizens and residents in the forefront of your planning for the new Costco superstore.

All best wishes,

~0le

Bruce "0le" Ohlson
Bike East Bay
Delta Pedalers Bicycle Club
Contra Costa Countywide Bicycle Advisory Committee
CCTA Bicycle & Pedestrian Advisory Committee
Caltrans District 4 Bicycle Advisory Committee
TRANSPLAN appointee to Highway 4 Integrated Corridor Management Study
Healthy and Livable Pittsburg Collaborative

From: [Marie Sullivan](#)
To: [Web Planning Division](#)
Date: Monday, January 31, 2022 3:01:57 PM

CAUTION – EXTERNAL SENDER

COSTCO

I've heard Costco wants to build next to Kohls.

If it is approved, I would like to see one of the conditions of approval be the extension of the road that leads into the shopping center over to Sand Creek Road. The intersection that feeds Home Depot, In and Out Burger, Lowes and Kohls, etc. is a night mare. Many a time you can not move as cars will pull into the intersection when there is no place to go blocking traffic. You may have a green light but you can't go due to this blockage. With the addition of another commercial site that obviously draws large traffic it will only get worse. Hopefully with another entrance and exit point for these commercial businesses it would relieve some of this congestion.

Sent from [Mail](#) for Windows

From: [cindy basa](#)
To: [Web Planning Division](#)
Subject: Costco
Date: Tuesday, January 25, 2022 11:07:12 AM

CAUTION – EXTERNAL SENDER

Thank you for looking at our growth and not just fast food or car wash!
Great opportunity for jobs!

Sent from my iPhone

From: [Peggy Adams](#)
To: [Web Planning Division](#)
Subject: Costco
Date: Tuesday, January 25, 2022 2:38:24 PM

CAUTION – EXTERNAL SENDER

Great news about a Costco...and a great location for it! Yay!!!

Peggy Adams

Mobile: [REDACTED]

Hagen, Jennifer

From: McVey, Amanda
Sent: Tuesday, June 20, 2023 6:34 PM
To: Brand, Kristopher; Flohr, Rod; Roberts, Anita; Sparling, David; Zeigler, Dirk
Cc: Hagen, Jennifer; Nolthenius, Erik
Subject: Public Comment received for Business Item: Costco

Good afternoon Chair and Planning Commissioners,

The City Clerk's office received a call from Steve Navarro who wanted to submit his public comment for this evening's Public Hearing related to Costco:

Steve expressed concerns related to the added traffic Costco will bring. "I love Costco, but I do not love additional traffic".

Steve would like to know if there is any other potential location within the City of Brentwood.

Finally, he stated that if Costco is approved, the roads and road improvements must be done first.

Please let me know if you would like to distribute this comment to the Commission or if you would like me to.

Thank you,
Amanda



Amanda McVey, Assistant City Clerk
City Manager's Office
150 City Park Way
Brentwood, CA 94513-1164
Phone: 925.516.5187
Fax: 925.516.5441
amcvey@brentwoodca.gov



Hagen, Jennifer

From: Timothy Stover <[REDACTED]>
Sent: Thursday, June 15, 2023 9:36 PM
To: Web Planning Division
Subject: Brentwood Costco

CAUTION – EXTERNAL SENDER

Dear City of Brentwood Planning Commission Members,

My spouse and I have been residents of Brentwood, CA since 2017. I am writing you in support of building a Costco warehouse near the Home Depot location off of Lone Tree way. I think it would be a great addition to the shopping in Brentwood, which is limited. I currently have to drive to Antioch or Concord to shop at Costco and I would prefer to shop closer to home in Brentwood. I hope the planning commission will support building the Costco in Brentwood.

Brentwood needs more shopping including department stores and restaurants. We travel to Concord, Walnut Creek and Livermore multiple times per week to do our shopping because of the lack of choice here in Brentwood. We avoid Antioch/Pittsburgh when possible because of safety concerns.

Regards,

Timothy Stover, Mary Stover
[REDACTED]

Hagen, Jennifer

From: Dale <[REDACTED]>
Sent: Friday, June 16, 2023 8:13 AM
To: Web Planning Division
Subject: Costco

CAUTION – EXTERNAL SENDER

We are in favor of the proposed Costco store in Brentwood. The company is an asset to the community and a store at that location would be more convenient than Pittsburg/Antioch or Tracy.

Thank you, Dale and Sue Jenlink.

Discovery Bay.

Sent from my iPhone

Hagen, Jennifer

From: chris zahnd <[REDACTED]>
Sent: Friday, June 16, 2023 10:09 AM
To: Web Planning Division
Subject: Costco

CAUTION – EXTERNAL SENDER

As a 31 year resident of Brentwood I have seen a lot of change. When I moved to Brentwood there was maybe 3 stop lights, Balfour was a rural type 2 lane road, nothing on Lone tree I could go on and on. In my opinion Brentwood has for the most part progressed well. I am a progressively minded person. I voted against the wealthy proposed development for the wealthy at the end of Balfour. I made my opinion known at city council meeting against bring Walmart to Brentwood. Me and my wife shop at Costco maybe 4 to 5 times a year. We are not bulk consumers for the most part. Costco I feel will be a positive for Brentwood. If the location is near the Home Depot that would be the right spot. The traffic in that area is what it is and yes they will get more traffic but better there than in central Brentwood. I really only see an upside for Brentwood. Property values, tax income for Brentwood, and jobs. As I understand Costco treats their employees well, a living wage and benefits. I would hope if Costco comes to Brentwood they would stock their shelves of the items of the higher end Costco's such as in Menlo Park, Livermore and so forth. Any way this is my humble opinion.

Chris Zahnd

Sent from my iPad

Hagen, Jennifer

From: LLOYD & FRANCES KELLY <[REDACTED]>
Sent: Friday, June 16, 2023 2:34 PM
To: Web Planning Division
Subject: COSTCO

CAUTION – EXTERNAL SENDER

Dear Planning Department-

We wish to comment on the possibility of a COSTCO being built in Brentwood.

We see massive New Home and Apartment complex construction taking place in and around Brentwood.

However, what we do not see, is new businesses coming to the area.

It would appear that we should be Encouraging new business to come to the area, not Discouraging them.

As Brentwood residents, we would like to be able do more local shopping.

Why would we spend our money shopping at the Pittsburg or Tracy COSTCO, if we could spend it at a Brentwood COSTCO?

We would indeed, welcome a local COSTCO!

We as residents, would benefit by shopping locally, and the City would receive the benefit of the tax revenue.

We endorse the plan to have a local COSTCO.

Thank you, Mr. and Mrs. Kelly

Hagen, Jennifer

From: Som Bhattacharya [REDACTED]
Sent: Friday, June 16, 2023 3:36 PM
To: Web Planning Division
Subject: Support Costco Moving into the Innovation Center

CAUTION – EXTERNAL SENDER

My wife and I are frequent shoppers at Costco in Antioch. It is a good company and to have it locally with tax dollars and jobs going to local economy is an easy choice for me. More competition is better for consumers as well.

Thank you.

Som and Suzanne Bhattacharya

Hagen, Jennifer

From: SI ZA [REDACTED]
Sent: Friday, June 16, 2023 6:04 PM
To: Web Planning Division
Subject: Brentwood COSTCO

CAUTION – EXTERNAL SENDER

We would really like the Brentwood COSTCO to open as soon as possible. The one in Antioch is too far away.

Thanks, Sam Z.

Hagen, Jennifer

From: sean zarifan [REDACTED]
Sent: Friday, June 16, 2023 6:08 PM
To: Web Planning Division
Subject: COSTCO in Brentwood

CAUTION – EXTERNAL SENDER

Me and family have been waiting for COSTCO to open it's doors in Brentwood and now we hear that it is still being debated. Please expedite. A COSTCO in Brentwood is really needed.

Sean Zarifan

Hagen, Jennifer

From: [REDACTED]
To: Web Planning Division
Subject: Costco

CAUTION – EXTERNAL SENDER

As a long-time Brentwood resident I just wanted to put in my two cents re Costco. I think it is a great idea and the taxes generated would be a welcome addition to the city coffers. Why give our hard earned money to Antioch (or in my case, Tracy). I don't see a down side.

Sherrill Zeserson

Hagen, Jennifer

From: Jim Stark [REDACTED]
Sent: Friday, June 16, 2023 10:04 PM
To: Web Planning Division
Subject: Costco

CAUTION – EXTERNAL SENDER

Dear Planning Commission,

Please accept this email a vote in favor for the new Costco in Brentwood. I understand that you will get plenty of complaining residents, but they will not benefit from the Costco as the rest of the city will. I also hope that it will have a gas station for us as well. Hopefully, Sand Creek will be extended to the location as well.

As a long time resident, I look forward to seeing this being built as soon as possible.

Thank you,

Jim Stark

Sent from my iPhone

Hagen, Jennifer

From: Marilyn Tamura [REDACTED] >
Sent: Saturday, June 17, 2023 10:03 PM
To: Web Planning Division
Subject: Costco in Brentwood

CAUTION – EXTERNAL SENDER

Hi! I saw the editorial in the Brentwood Press and wanted to comment on the Costco coming to Brentwood. My husband and I are all for it as long as the Sand Creek extension is completed. Otherwise, traffic on Lone Tree will be unmanageable.

We have lived in Brentwood for over 20 years.

You have done a great job trying to stay ahead of all the influx and changes.

Please continue your good work and I look forward to having a Costco near us!

Best regards,

Marilyn Tamura

Hagen, Jennifer

From: Michael Towns [REDACTED] >
Sent: Sunday, June 18, 2023 7:53 AM
To: Web Planning Division; =yCouncil Members
Subject: Costco - support

CAUTION – EXTERNAL SENDER

Brentwood Planning department and City Council,

I want to express my support for the building of Costco in Brentwood.

Thanks,
Mike Towns

[REDACTED]
Resident since 1992

Hagen, Jennifer

From: Kay E Nelson [REDACTED] >
Sent: Sunday, June 18, 2023 9:52 AM
To: Web Planning Division
Subject: Possible Costco store

CAUTION – EXTERNAL SENDER

I would like to voice my opinion on the possible building of a Costco store in Brentwood. I live in one of the over 55 communities and would welcome a Costco store close by. As a senior in my 70s, I am driving less far and the speeders on Hwy. 4 make it undesirable to drive to Antioch. Please approve the building of this store which would bring several jobs to Brentwood and increase convenience in shopping for seniors and younger residents alike.

Kay Nelson
Summerset II

Hagen, Jennifer

From: Lai Woudstra <[REDACTED]>
Sent: Sunday, June 18, 2023 6:21 PM
To: Web Planning Division
Subject: Costco

CAUTION – EXTERNAL SENDER

Dear Planning Commission,

I am writing in support of Costco coming to Brentwood. It would be foolish for the City to miss the tax revenues (\$1 million/ yr.) generated by Costco sales (like you did with Chick-fil-A)! Second, the Lone Tree corridor has gotten too crowded. This project will open up Sand Creek Road. Please do not listen to the vocal minority (NIMBYs). Brentwood already made the mistake with Chick-fil-A, and all the revenues that restaurant could have brought into the City.

Sincerely,

Lai Woudstra
Resident

Sent from my iPhone

Hagen, Jennifer

From: David Stoeffler [REDACTED]
Sent: Sunday, June 18, 2023 8:53 PM
To: Web Planning Division
Subject: COSTCO

CAUTION – EXTERNAL SENDER

I am looking forward to COSTCO being closer, but am also concerned that the ERI may not be conducted. I am interested that pedestrian and bicycle infrastructure in the area be included in the planning. The new bicycle/pedestrian bridge that will soon be completed will bring a lot more people traveling by foot or bicycle and as a nationally recognized Bicycle Friendly Community their safety must be considered.

Dave Stoeffler
[REDACTED]
Brentwood

Hagen, Jennifer

From: Cindy Shehorn [REDACTED]
Sent: Monday, June 19, 2023 10:52 AM
To: Web Planning Division; Cindy Shehorn
Subject: Costco Proposal

CAUTION – EXTERNAL SENDER

Good morning Planning Commission and thank you for the opportunity to voice an opinion on the proposal to build a Costco next to the Home Depot Plaza in Brentwood. As a long time Brentwood resident I want to acknowledge the great work our Planning Commission has done to make Brentwood the beautiful city it is today. Thank you for your hard work and your dedication to our community.

I am mostly in favor of having a Costco in Brentwood but do have a few concerns which I've listed below. Whatever the outcome, I'm sure the city will weigh the benefits and make a decision that leads our city forward.

I do hope we all keep in mind what makes our city so attractive, and why people move here to begin with. Our farming community is our primary superpower and whatever improvements we do make, should keep the farming community in mind.

I am in favor of having a Costco in Brentwood for the following reasons:

- Revenue for the city, parks, police and General fund
- Convenience of having a Costco close to home
- Expanding and/or more car friendly parking/navigating at Home Depot Plaza
- Expanding employment opportunities and shopping in our city
- Fewer cars traveling to Antioch
- Reduced traffic on Lone Tree
- Mitigate Antioch's constant encroachment on the City of Brentwood

Concerns:

- Increased traffic on Sand Creek Road
- Noise in the area
- Inadequate highways and exits to accommodate additional traffic, new housing, shopping and employment in east county
- More crime in that area
- Opening Sand Creek to Hillcrest is worrisome because of the crime ridden city Antioch has become and the lack of an accountable police force to manage crime from an area that will have a direct connection to central Brentwood.
- Gobbling up open space on the outskirts of Brentwood that could be used for recreation, parks, farming, hiking etc.

Thank you again for the opportunity.
Cindy Shehorn
28 Year Brentwood Resident

Hagen, Jennifer

From: S Z <[REDACTED]>
Sent: Monday, June 19, 2023 11:05 AM
To: Web Planning Division
Subject: Please Approve the Construction of COSTCO asap.

CAUTION – EXTERNAL SENDER

I live in oakley and am tired of driving to Antioch to visit COSTCO. I love COSTCO and many other people do as well.

Thanks, Stan Z.

Hagen, Jennifer

From: S Z [REDACTED] >
Sent: Monday, June 19, 2023 11:09 AM
To: Web Planning Division
Subject: New COSTCO store in Brentwood.

CAUTION – EXTERNAL SENDER

Many people are waiting for the new COSTCO store to open up as soon as possible. You have all of our support. Please expedite the opening of this store.

Thanks, Sadiq

Hagen, Jennifer

From: jane garcia <[REDACTED]>
Sent: Tuesday, June 20, 2023 9:41 AM
To: Web Planning Division
Subject: Costco

CAUTION – EXTERNAL SENDER

I am definitely in favor of Costco coming to Brentwood. It will be a nice to have the Tax revenue for Brentwoodmany years ago I saw San Ramon neighbors fight a Costco and Costco built a store across the street in Danville and SR still got all the traffic & Danville the revenue. Let's not let that happen here!

J. Garcia in SSIV

Sent from my iPad

Hagen, Jennifer

From: [REDACTED]
Sent: Tuesday, June 20, 2023 10:19 AM
To: Web Planning Division
Subject: Costco

CAUTION – EXTERNAL SENDER

Dear Planning Commissioner,

I want to voice how excited I am about Costco coming to our town Brentwood!
It would be wonderful to have it in our city.
It seems it would also create a lot of job opportunities for residents.
Brentwood would benefit so much from the tax dollars it would generate also for our city.

Thank you
Kim Henson
Brentwood resident

Sent from my iPhone

Hagen, Jennifer

From: Patricia Buchanan [REDACTED] >
Sent: Tuesday, June 20, 2023 10:29 AM
To: Web Planning Division
Subject: Costco for Brentwood

CAUTION – EXTERNAL SENDER

I am in favor of building a Costco in Brentwood. It will bring in more revenue for the city and be much more convenient than going to Antioch or Tracy. In addition it will bring jobs and Brentwood will have a big business here rather than all the 7/11s, gas stations, and car washes that have come into the city.

Patricia Buchanan



June 20, 2023

To the Honorable Brentwood Planning Commission:

We are residents and neighbors who are proud to live in East Contra Costa County and who share concerns about climate change and that we may be growing irresponsibly and too fast as a community, without proper infrastructure to support all the developments our city governments keep approving.

We believe that a prime example of this unbridled growth and “build now, worry about negative impacts later” approach to growth and irresponsible land use, is the proposed Costco development, just south of Lone Tree Plaza Drive, along the Antioch and Brentwood city borders.

While we do not have problems with Costco as a business or employer, we do have concerns that the City of Brentwood appears poised to rush this massive development through their approval process *without* requiring a standard and stand-alone Environmental Impact Report (EIR) on the negative impacts the project will have on traffic, commute and emergency response times, public safety, noise and light pollution, air quality and on our existing businesses and jobs in the area.

For the city to say that this project was properly studied and included as part of a four year old EIR for the even larger Brentwood Innovation Center master planned community, is suspicious and unfair to residents who want to know the true impacts this development will have on their quality of life and property values, for many years to come. Where are the studies that show the specific impacts that a 156,000 sq. ft. Costco warehouse and 32-pump gas station will have on traffic, vehicle miles traveled, air quality, pollution, bike and pedestrian safety and the environment, in the surrounding area?

It also needs to be shared with the Commission that there has been an utter lack of transparency about this project to the public. We have been contacting city planning staff for months to get information about the project and the level of CEQA review that the project would receive. Numerous calls and questions about whether an EIR would be required for the project were, now it seems intentionally, not addressed because “the review was incomplete.” However, it is apparent now that planning staff knew all along that this project was being considered as part of the Brentwood Innovation Center master planned community and that the developer would be relying on the zoning and EIR approvals for that project to avoid having to do a stand-alone EIR, or even an amended EIR, for the proposed Costco project.

Why would staff simply not relay this information early on? Why wait until seven days before this Commission meeting to relay that information in the agenda packet only? One can only assume that this lack of transparency about the project, was an intentional effort to minimize awareness about this hearing and project impacts. The bare minimum legal notice provided is not to be commended. Yes, a sign that you must pull over and get out to read is on one side of the property where few cars drive, and yes, the notice of the hearing probably made it in the small print of a paper that no one reads, and yes, maybe a letter went out to the few businesses that are within a ridiculous 300 feet of the property, but what about notice to the hundreds



of homes across the way on the Antioch side? They will feel the project impacts the most! We hope that the Commission will not take staffs' or the developer's word that residents' silence equates to support for or lack of concern for this project. Most neighbors we talked to simply had no clue this project was moving forward, that it was part of a larger master planned community with an old EIR, or that a hearing was being held tonight. Following are some of our specific concerns about this project.

- **Traffic:** the average Costco warehouse and gas station generate at least 8,000 – 14,000 new daily vehicle trips PER day! Imagine what even just 10,000 new cars per day on our roads will mean for our *commute times, traffic, and emergency response times* in our neighborhood. What is being done to offset this new traffic? An extension of Sand Creek Road is insufficient to offset Costco sized traffic generation.
- **Bike/Pedestrian Safety:** the proposed Costco is located just to the west of the new \$13,000,000 bicycle and pedestrian bridge that is currently being built over Hwy 4, and right alongside the highly trafficked Mokelumne Aqueduct Regional Trail. We are asking for developer paid mitigations to offset project impacts to pedestrians and bicyclists in Brentwood, Antioch, and Oakley.
- **Environment/Pollution:** the Costco warehouse and gas station will generate tons of new CO2 emissions, stormwater runoff, toxic fuel emissions and impact existing wild and plant life. What is being done to deal with these impacts? Are adequate electric vehicle charging stations being required to help meet state goals and requirements?
- **Taxpayers:** the city is planning to spend millions of dollars in taxpayer money to pay for traffic mitigation and road improvements to support the proposed development. Costco is the third largest retailer in the world and should be paying for all improvements needed to support their development and profits. Also, any sales tax revenues to Brentwood should be split with Antioch given that those residents will feel the brunt of the project impacts.

For these reasons, and more, we respectfully ask that the Commission require that a stand-alone EIR, or at least a supplemental EIR, be conducted to assess project specific impacts and meaningful mitigations that should be adopted to minimize those project impacts. And if project impacts cannot be significantly offset or minimized, the Commission should ask that alternative uses that will have less of a detrimental impact on neighbors and the environment be studied and considered.

We will close by reiterating that few people who live near the proposed site are even aware of this project and the impacts that it is going to have on their daily quality of life and the environment. The city of Brentwood needs to slow things down and **require that a stand-alone EIR be conducted** so that we know for sure what impacts this project will have on the community and what Costco needs to do to mitigate and minimize those impacts.

Sincerely,

Contra Costa Climate Action Coalition

Hagen, Jennifer

From: Dave Reed [REDACTED] >
Sent: Tuesday, June 20, 2023 1:25 PM
To: Web Planning Division
Subject: Brentwood Costco

CAUTION – EXTERNAL SENDER

YES, COSTCO needs to come to Brentwood. Brentwood Has grown rapidly and continues to grow, we need the tax dollars that Costco can provide and to have them

stay in Brentwood and not go to Antioch and Tracy as they do now. We need more dollars for the new Sports Field and also to maintain the beauty of Brentwood. The

landscaping around the City is wonderful. Let's not miss this once in a lifetime opportunity.

David & Alice Reed

[REDACTED]
Brentwood, Ca

Hagen, Jennifer

From: Cathy Richardson [REDACTED] >
Sent: Tuesday, June 20, 2023 1:46 PM
To: Web Planning Division
Subject: Costco

CAUTION – EXTERNAL SENDER

Hello,

I would just like to let you know that I'm fully in support of Costco coming to Brentwood. It would be wonderful for our city! Please don't let this opportunity pass us by!

Thanks,

Cathy Richardson

[REDACTED]

Aim for the moon, if you miss, you may hit a star ✨

W. Clement Stone

Hagen, Jennifer

From: craig carson <[REDACTED]>
Sent: Tuesday, June 20, 2023 2:23 PM
To: Web Planning Division
Subject: Costco Project

CAUTION – EXTERNAL SENDER

We have used Costco for much of our business related and personal shopping over the years. Driving to Tracy or Antioch has become a real inconvenience, wasting time on the road, contributing to more traffic and greater fuel consumption.

Please move forward on approval of the Costco store in Brentwood. It will help our City's tax base, take traffic off of our roadways and keep us closer to home.

Sincerely, Craig and Paulette Carson

Hagen, Jennifer

From: Kathi Reed <[REDACTED]>
Sent: Tuesday, June 20, 2023 2:47 PM
To: Web Planning Division
Subject: Supporting Costo Application

CAUTION – EXTERNAL SENDER

Commissioners:

My husband and I submit this email in support of Costo's application to construct a warehouse and gas station in Brentwood.

We moved to Brentwood in 2002 and since then have seen the City grow in population and housing density. During this growth, a common request has been to bring more businesses and job opportunities to Brentwood. The construction of a new Costco warehouse/gas station in Brentwood is a good start. Not only will jobs be created, reducing the need for local residents to commute to their jobs, a thriving Costco can also attract other large businesses to consider Brentwood when looking to expand.

We currently drive to Antioch, Tracy or Livermore to shop at Costco. A Costco in Brentwood eliminates the need to drive to other locations and keeps the taxes we pay on our purchases here in Brentwood.

We encourage the Planning Commission, and ultimately the City Council, to approve Costco's application.

Kathi and Bob Reed
[REDACTED]

ELLIS F. RASKIN
 SENIOR COUNSEL
 DIRECT DIAL (415) 995-5835
 DIRECT FAX (415) 995-3456
 E-MAIL eraskin@hansonbridgett.com



June 20, 2023

VIA E-MAIL to planning@brentwoodca.gov

Anita Roberts, Chairperson
 Planning Commission
 City of Brentwood
 150 City Park Way
 Brentwood, CA 94513

Re: Agenda Item No. 2 – Public Hearing Regarding the Costco Project (APNs 019-020-073 and 019-020-055); MS 351-22, DR 22-002, CUP 22-001, MSP 22-001, and Proposed California Environmental Quality Act Exemption

Dear Chairperson Roberts and Members of the Planning Commission:

This office represents WCHB, LLC, the owner and developer of the Bridle Gate residential development project located immediately south of the proposed approximately 431-acre Priority Area 1 Specific Plan area. We urge the Planning Commission to **deny** the Tentative Parcel Map (MS 351-22), Design Review (DR 22-002), Conditional Use Permit (CUP 22-001), and Master Sign Program (MSP 22-001) applications for the proposed development of the Costco Project (“Project”) at the two vacant parcels located south of Lone Tree Plaza Drive and east of Heidorn Ranch Road (APNs 019-020-073 and 019-020-055).

For the reasons set forth in this letter, the Project does not qualify for an exemption from the California Environmental Quality Act (“CEQA;” Pub. Resources Code, § 21000 et seq.) under Section 15183 of the State CEQA Guidelines (Cal. Code Regs., tit. 14, § 15000 et seq.). Furthermore, the proposed findings for the above-referenced Project entitlements are not supported by substantial evidence. Accordingly, we urge you to deny the application or, at the very least, to continue this item to allow for further CEQA review.

1. Background Regarding the PA-1 Specific Plan and the Costco Project

As you know, the City of Brentwood (“City”) approved the PA-1 Specific Plan and certified the Environmental Impact Report (“EIR”) for the PA-1 Specific Plan nearly five years ago, in November 2018. In October 2022, the City adopted a CEQA addendum for the PA-1 Specific Plan EIR and amended the PA-1 Specific Plan by changing the land-use designation for the 19.04-acre parcel in the eastern part of the Project site from Transit Village/Mixed Use (TV/MU) to Regional Commercial (RC).

The Project site is located within the Lone Tree Plaza shopping center in west Brentwood near the Antioch/Brentwood city limits. The Costco Site and the majority of Costco’s associated facilities and site improvements would be located exclusively on APN 019-020-073 on the eastern half of the project site. The proposed project would include the development of a new

Hanson Bridgett LLP
 777 S. Figueroa Street, Suite 4200, Los Angeles, CA 90017 hansonbridgett.com

Anita Roberts, Chairperson
 Planning Commission
 June 20, 2023
 Page 2

152,000-square-foot Costco Wholesale warehouse and various site circulation, surface parking, and landscaping improvements. Uses at the Project site will include, among other things: a warehouse retail center, tire sales and installation, and a fuel facility.

2. The Project Does Not Qualify for an Exemption from Further Review Under the California Environmental Quality Act

The City has taken the position that the Project is exempt from CEQA under Guidelines Section 15183 because “[c]umulative impacts associated with full development and buildout of the Specific Plan Area, including the proposed project site, were fully addressed in the PA-1 Specific Plan EIR” and “[n]o additional impacts to on-site resources have been identified beyond what was envisioned in the EIR.” (See Agenda Packet, pp. 23-24.)

The Project does not qualify for an exemption under Section 15183. The Project is not consistent with the development standards in the amended version of the PA-1 Specific Plan that was approved in October 2022. Furthermore, there are project-specific significant effects which are peculiar to the project and its site.

CEQA requires that “[w]hen a program EIR is used to avoid preparing subsequent EIRs, such as here, the public agency must examine site-specific program activities ‘in the light of the program EIR to determine whether an additional environmental document must be prepared.’ ” *Center for Biological Diversity v. Dep’t of Fish & Wildlife* (2015) 234 Cal.App.4th 214, 238. Furthermore, as the Specific Plan EIR states, “[d]evelopment projects in the Specific Plan Area that require further discretionary approvals will be examined in light of this EIR to determine whether additional environmental documentation must be prepared.” (PA-1 Specific Plan Draft EIR, p. ES-1.) Here, substantial evidence shows that further environmental review is necessary.

a. Background Principles Regarding the California Environmental Quality Act

CEQA requires public agencies to disclose and analyze adverse environmental effects of projects before approving those projects. “[I]t is the policy of the state that public agencies should not approve projects as proposed if there are feasible alternatives or feasible mitigation measures available which would substantially lessen the significant environmental effects of such projects.” (Pub. Resources Code, § 21002.) CEQA is “intended to assist public agencies in systematically identifying both the significant effects of proposed projects and the feasible alternatives or feasible mitigation measures which will avoid or substantially lessen such significant effects.” (*Ibid.*)

When reviewing whether a project will have adverse environmental impacts, public agencies must disclose, analyze and mitigate any environmental effects on “human beings, either directly or indirectly.” (Pub. Resources Code, § 21083, subd. (b)(3); Guidelines, § 15065, subd. (a)(4).) California’s environmental justice statutes require CEQA to be applied in a manner that fairly and equitably considers potential disparate impacts on the basis of age, disability, or other protected characteristics. (Gov. Code, § 11135, subd. (a); *id.* at § 65040.12, subd. (e).)

Fundamentally, the purpose of CEQA is to enable decisionmakers and members of the public to make meaningful and fully-informed decisions about new development and land use planning in their community. (See *Vineyard Area Citizens for Responsible Growth, Inc. v. City of Rancho*

Anita Roberts, Chairperson
 Planning Commission
 June 20, 2023
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Cordova (2007) 40 Cal.4th 412, 448-450.) As the Court of Appeal explained in *Save Our Big Trees v. City of Santa Cruz* (2015) 241 Cal.App.4th 694, 704-705, CEQA review procedures generally involve a “three-tiered process.”¹

“The first tier requires an agency to conduct a preliminary review to determine whether CEQA applies to a proposed project. [Citation.] If CEQA applies, the agency must proceed to the second tier of the process by conducting an initial study of the project. [Citation.] Among the purposes of the initial study is to help ‘to inform the choice between a negative declaration and an Environmental Impact Report [“EIR”].’ [Citation.] If there is ‘no substantial evidence that the project or any of its aspects may cause a significant effect on the environment,’ the agency prepares a negative declaration. (Guidelines, § 15063, subd. (b)(2).) Alternatively, if ‘the initial study identifies potentially significant effects on the environment but revisions in the project plans ‘would avoid the effects or mitigate the effects to a point where clearly no significant effect on the environment would occur’ and there is no substantial evidence that the project as revised may have a significant effect on the environment, a mitigated negative declaration may be used.’ [Citation.] Finally, if the initial study uncovers ‘substantial evidence that any aspect of the project, either individually or cumulatively, may cause a significant effect on the environment’ (CEQA Guidelines, § 15063, subd. (b)(1)), the agency must proceed to the third tier of the review process and prepare a full EIR [Citation.]”

As noted above, CEQA mandates a finding of significant impact, and thus preparation of an EIR, when substantial evidence, in light of the whole record, shows that a project may have a significant cumulative effect, or has “effects [that] will cause substantial adverse effects on human beings, either directly or indirectly.” (Pub. Resources Code, § 21083, subd. (b)(2), (3); Guidelines, § 15065, subd. (a)(3), (4).)

CEQA and the Guidelines require a CEQA analyses to disclose and evaluate a project’s cumulative impacts and lead agencies may not, *ipso jure*, equate individually minor effects with cumulatively minor effects. Rather, CEQA mandates “a finding that a project *may* have ‘a significant effect on the environment’ ” where the “possible effects of a project are individually limited but cumulatively considerable.” (Pub. Resources Code, § 21083, subd. (b), emphasis added; Guidelines, § 15065, subd. (a)(3).) “[C]umulatively considerable means that the incremental effects of an individual project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.” (Pub. Resources Code, § 21083, subd. (b)(2).)

Cumulative impacts may compound or increase other environmental impacts, and a CEQA analysis must inquire into and discuss the incremental impacts of a project when added to closely related past, present, and reasonably foreseeable probable future development projects taking place over a period of time. (Guidelines, §§ 15130, 15355, 15358; see *North Coast*

¹ “The foremost principle under CEQA is that the Legislature intended the act ‘to be interpreted in such manner as to afford the fullest possible protection to the environment within the reasonable scope of the statutory language.’ (*Friends of Mammoth v. Board of Supervisors* (1972) 8 Cal.3d 247, 259.)” (*Laurel Heights Improvement Assn. v. Regents of University of California* (1988) 47 Cal.3d 376, 390.)

Rivers Alliance v. Kawamura (2015) 243 Cal.App.4th 647, 682; *Kings County Farm Bureau v. City of Hanford* (1990) 221 Cal.App.3d 692, 721.) Even when a combined cumulative impact associated with a project's incremental effect and the effects of other related projects is not significant, the analysis still must "briefly indicate why the cumulative impact is not significant and is not discussed in further detail." (Guidelines, § 15130, subd. (a)(2).) "A Lead Agency shall identify facts and analysis supporting the lead agency's conclusion that the cumulative impact is less than significant." (*Ibid.*)

b. Further Environmental Review is Required When Projects Will Have Environmental Effects That Were Not Studied in a Program EIR

CEQA Guidelines Section 15168 provides the specific requirements for environmental review of projects undertaken pursuant to a program EIR.² Section 15168(c) specifies that "[l]ater activities in the program must be examined in the light of the program EIR to determine whether an additional environmental document must be prepared."

Specifically, "[i]f a later activity would have effects that were not examined in the program EIR, a new initial study would need to be prepared leading to either an EIR or a negative declaration." (Guidelines, § 15168(c)(1).) Here, numerous effects of the Project were not examined in the Specific Plan EIR and therefore an initial study and either an EIR or negative declaration are required. (See *Lighthouse Field Beach Rescue v. City of Santa Cruz* (2005) 131 Cal.App.4th 1170, 1180 (2005) ["It is now well established, however, that an initial study is the preliminary environmental analysis and its purposes include proving the lead agency with information to use as the basis for deciding whether to prepare an EIR or negative declaration, enabling an applicant or lead agency to modify a project, mitigating adverse impacts before an EIR is prepared, thereby enabling the project to qualify for a negative declaration, and providing documentation of the factual basis for the finding in a negative declaration that a project will not have a significant effect on the environment." Internal alterations and quotations omitted].)

Here, the proposed warehouse retail center, tire sales and installation, fuel facility, and other proposed uses will have environmental effects that were never studied in the PA-1 Specific Plan EIR (or the Addendum). Indeed, the EIR anticipated that the Project Site would be designated as part of the transit Village portion of the PA-1 Specific Plan Area; service stations are prohibited in the Transit Village land use designation. The EIR never evaluated any of the site-specific or use-specific environmental impacts associated with a large-scale retail or gasoline service station at the Project site.

New traffic, GHG, and air quality analyses that were cited in the City's CEQA analysis (prepared by Kittelson & Associates and Ramboll US Consulting, Inc.) confirm that there are project-specific changes that were not examined in the PA-1 Specific Plan EIR or addendum. The findings of this analysis should have been disclosed in an appropriate CEQA document, and the Project therefore cannot rely on outdated environmental disclosures in the PA-1 Specific Plan EIR.

² The PA-1 Specific Plan EIR specifically acknowledges that it is a program EIR. (Draft EIR at p. ES-1 ["This EIR has been prepared as a Program EIR pursuant to CEQA Guidelines Section 15168."]).

Among other things, additional environmental review is required to evaluate the following impacts.

i. Aesthetics

As noted above, the PA-1 Specific Plan EIR anticipated that the portion of the Project site that will contain the proposed development would be part of the Transit Village land use designation. The Transit Village is described as a land use designation that will allow for a “mix of high-intensity uses” in a “mixed-use district.” Large parking areas are generally not anticipated to be found in the Transit Village, as parking is limited to 40% of the total lot area. (See Table 6.2.) In Regional Commercial areas, such as the proposed Project site, there are large parking areas with substantial outdoor lighting. The lighting associated with the Project will likely contribute to direct, indirect, and cumulative impacts associated with lighting and glare, and there is no evidence in the record to substantiate that the proposed lighting will comply with the design guidelines set forth in Section 3.1 of the PA-1 Specific Plan EIR.

ii. Air Quality

According to the City’s analysis, “[t]he square footage of the proposed Project would be less than the corresponding square footage assumed for retail development for this portion of the PA-1 Specific Plan, and thus, it is expected that the proposed Project would have similar if not lower emissions for this portion of the PA-1 Specific Plan.” (See p. 38.) But a pure volumetric analysis for these land uses does not provide a complete picture of how changes in uses can lead to more significant air quality and GHG impacts.

As noted above, the Project Site was previously designated for mixed-use residential development as part of the transit Village, allowing for residential uses and a small number of limited commercial uses such as “and medical offices, personal services, retail and restaurants, entertainment, and personal hospitality uses.” Now, the site is Regional Commercial, which is for “parcels located along Lone Tree Way and State Route 4, and accommodates bulk retailers, department stores, supermarkets, hardware stores, smaller, specialty retailers, and professional and medical offices.” Mobile traffic patterns for these two uses are very different, including the potential for more truck hauling and deliveries for Regional Commercial. These changes have not been analyzed. Furthermore, the specific fuel station use creates a larger potential for idling vehicles waiting for available fuel stations – this impact on TAC emissions is not analyzed in the PA-1 EIR and Addendum.

Potential direct, indirect, and cumulative air quality impacts associated with venting fumes, potential spills, and other events at the proposed fuel station are not evaluated in the EIR or the addendum. These impacts must be evaluated in further CEQA review.

iii. Biological Resources

Here, the CEQA analysis does not address the project-specific direct, indirect, or cumulative impacts that could result from the operation of a fuel service station or the other proposed uses at the Project site. Given the substantial amount of traffic and outdoor lighting associated with the proposed Project, further CEQA analysis is needed to understand and mitigate impacts on

wildlife habitat and movement, including potential edge-effects on wildlife movement in areas near the Project site.

iv. Geology and Soils

The PA-1 Specific Plan EIR acknowledges the potential for significant impacts resulting from seismic-related ground failure, including liquefaction. (Draft EIR, p. 3.6-18.) Accordingly, the Specific Plan EIR requires that “[a]ll future projects within the Specific Plan Area would be required to prepare geotechnical soils investigations to address seismic safety issues and provide adequate mitigation for potential hazards identified.” (Draft EIR, p. 3.6-19.) Specifically, the EIR “[r]equire[s] the submission of geologic and soils reports for all new developments” and further provides that “[t]he geologic risk areas that are determined from these studies shall have standards established and recommendations shall be incorporated into development.” (Draft EIR, p. 3.6-19.) Here, the PA-1 Specific Plan EIR never anticipated that a fuel service station would be developed at the Project site, and there is no analysis of heightened risks of geologic impacts (or soil contamination) associated with the operation of the uses proposed by the Project.

v. GHG Emissions

The PA-1 Specific Plan EIR never evaluated site-specific impacts associated with the transportation and sale of gasoline, and it does not evaluate whether these impacts are consistent with the state’s GHG reduction goals and strategies as discussed in the MTC/ABAG’s Plan Bay Area 2050.

The City’s CEQA analysis incorrectly assumes that “[t]he land uses assumed for development of the proposed Project are similar in nature to those assumed in the PA-1 Specific Plan EIR in terms of potential mobile source emissions that may be generated by these land uses.” The new uses proposed by the Project and their associated mobile source emissions are substantially different than those associated with the mixed-use transit village that was studied in the EIR. Further CEQA analysis is needed to analyze and mitigate impacts associated with customer traffic and deliveries. The specific fuel station use creates a larger potential for idling vehicles waiting for available fuel stations – this impact on TAC emissions is not analyzed in the PA-1 EIR and Addendum.

vi. Hazards and Hazardous Materials

Neither the PA-1 EIR nor the Addendum analyze the potential impacts of a fueling station, including the transport of fuel to the site and the potential for contaminated runoff. The exemption analysis essentially admits this and tries to split the difference by including “Project Requirements” calling for permit approvals with third party agencies and preparation of a hazardous materials plan. However, this is essentially an admission of significant impacts and potential mitigation measures that can be imposed, but since the Project is claiming an exemption, these Mitigation Measures are not being included under CEQA. The Project should prepare an appropriate CEQA analysis that includes these “Project Requirements” as mitigation measures.

vii. Hydrology and Water Quality

The PA-1 Specific Plan EIR acknowledges the possible impact of development on stormwater-related violations of water quality standards or waste discharge requirements. To mitigate these potential impacts, Policy IF 4-3 “[r]equire[s] all development projects to demonstrate how storm water runoff will be detained or retained on-site and/or conveyed to the nearest drainage facility as part of the development review process and as required by the City’s NPDES Municipal Regional Permit.” (Draft EIR, p. 3.9-16.) Furthermore, “Project applicants shall mitigate any drainage impacts as necessary.” (Draft EIR, p. 3.9-16.) Here, however, there is no analysis of potential new significant impacts associated with changes to the area’s surface cover (including a substantial amount of paved areas that will be used for parking) and the new service station. There is no analysis or acknowledgement of potential contamination from automobile-related uses, including potential spills at the service station. Further analysis is needed to determine whether there are additional undisclosed and unmitigated impacts, and whether the Project can be operated in a manner that complies with the EIR’s adopted mitigation measures.

viii. Noise

The PA-1 Specific Plan EIR and Addendum do not analyze or mitigate potential noise impacts associated with changing mobile traffic patterns and operational uses associated with the proposed Project. Direct, indirect, and cumulative noise impacts associated with the changed land uses and traffic patterns must be evaluated in an appropriate CEQA analysis.

ix. Population and Housing

The City asserts that the proposed development would not induce population growth, either directly or indirectly. While it is acknowledged that the Project may create local jobs, the City claims that these employment opportunities would not generate significant growth or expand the job base in a manner that would lead to notable population increase.

However, it is important to consider the specific details and context of the proposed Costco Project. The Project site was originally contemplated as a Transit Village, which would be used for mixed-use residential purposes along with a limited range of commercial activities, such as medical offices and personal services. The current designation of the site is Regional Commercial, which allows bulk retailers, department stores, supermarkets, hardware stores, smaller specialty retailers, and other similar uses. The two land uses result in different personnel intensity levels, and thereby, result in different population and housing needs. Further CEQA review is needed to assess potential impacts on population and housing resulting from the Costco Project.

x. Public Services

The City’s analysis assumes that the Project “would not require the development of a new facility or modifications of an existing facility at this time.” (See p. 104.) Additional CEQA analysis is needed to determine whether the Project’s proposed uses, including the service station, will require new or additional fire or other emergency services in the City.

xi. Transportation and Traffic

As noted above, the Project Site was previously designated for mixed-use residential development as part of the transit Village, allowing for residential uses and a small number of limited commercial uses such as “and medical offices, personal services, retail and restaurants, entertainment, and personal hospitality uses.” Now, the site is Regional Commercial, which is for “parcels located along Lone Tree Way and State Route 4, and accommodates bulk retailers, department stores, supermarkets, hardware stores, smaller, specialty retailers, and professional and medical offices.” Mobile traffic patterns for these two uses are very different, including the potential for more truck hauling and deliveries for Regional Commercial. These changes have not been analyzed. Furthermore, the specific fuel station use creates a larger potential for idling vehicles waiting for available fuel stations – this impact on TAC emissions is not analyzed in the PA-1 EIR and Addendum.

The 2022 Addendum does not include any significant analysis of the changes to the land use map that were approved in 2022, including changes to the Project site. It concludes that employment generation under the amendments will decrease because of non-residential square footage decreasing overall, and it notes that dwelling unit counts are near identical. The addendum concludes that “none of the minor changes with the Modified Project have the potential to result in new or more severe environmental impacts [...]”, and concludes no further analysis is needed pursuant to Section 15162 of the CEQA Guidelines. But as noted above, there will be substantial changes to the traffic patterns and mobile source emissions associated with the Regional Commercial uses.

The 2018 PA-1 Draft EIR does not specifically analyze circulation with respect to the Project Site, and does not analyze the potential for a fueling station on the site. With respect to operational truck traffic, the only specific analysis is the Draft EIR’s observation that “Currently, Lone Tree Way is designated as a truck route. The City Municipal Code allows truck drivers to use other city streets as well, provided those streets comprise the most direct route between the nearest truck route and the freight origin or destination, unless such movements are expressly prohibited by posted signs.” (3.14-14). Further analysis of impacts associated with these uses is needed.

Furthermore, neither the original EIR nor the Addendum disclose or evaluate whether the Project will comply with the revised circulation plan that was adopted as part of the 2022 amendments to the PA-1 Specific Plan. It also appears that the Project now conflicts with new policies that were adopted as part of the 2022 amendments:

- **Policy C.11** – Require New development Projects that would generate more than 50 employees must implement Transportation Demand Management (TDM) programs to address the impacts on vehicular traffic on streets within and beyond the project area. Here, the Staff Report estimated 250-300 employees at Costco, but there do not appear to be any required TDM programs for the Project.
- **Circulation Design Guideline No. 10** – Commercial and Office development projects should incorporate curbside drop off and pickup areas into their site design and circulation/parking areas to facilitate safe and convenient pickup and drop off

options. The site plans (see, e.g., sheet A-002) do not show curbside drop-off and pickup areas.

Finally, additional CEQA analysis is needed to evaluate the adequacy of emergency ingress and egress for the specific uses proposed by the Project.

xii. Wildfire Hazards

Neither the EIR nor the Addendum contemplated the types of uses proposed by this Project. Further analysis is needed to evaluate (and potentially mitigate) wildfire risks associated with the service station, retail uses, and other proposed activities at the Project site. Analysis is also needed to determine whether changes in the patterns of Project-related vehicle trips (including deliveries) may contribute to increased offsite wildfire risks.

c. The Project is not Consistent with the PA-1 Specific Plan and Project-Specific Significant Effects which are Peculiar to the Project Site Require Further Environmental Review

Guidelines section 15183 provides that exempt classes of projects include, but are not limited to, qualifying projects “consistent with the development density established by existing zoning, community plan, or general plan policies for which an EIR was certified.” (Guidelines, § 15183, subd. (a).) Such projects “shall not require additional environmental review, except as might be necessary to examine whether there are project-specific significant effects which are peculiar to the project or its site.” (*Ibid.*; see also *id.* § 15183.3, subd. (d)(2)(A).)

For the reasons discussed above, there are project-specific significant effects which are peculiar to the project or its site that require further analysis. Given that the original EIR never contemplated large-scale retail, service stations, or other similar uses at the Project site, the original PA-1 Specific Plan EIR requires substantial updates.

As noted above, it appears that the Project conflicts with new policies that were adopted as part of the 2022 amendments. These conflicts render the Project ineligible for a CEQA exemption under Guidelines Section 15183.

Finally, as noted below, the City cannot make the required conditional use permit findings for the service station. Because service stations in the Regional Commercial land use designation are only authorized as a conditional use when they are accessory to general large format retailers, the Project is not consistent with the applicable PA-1 development standards.

3. The Proposed Tentative Parcel Map Findings Required Pursuant to Brentwood Municipal Code Section 16.05.040 and Government Code Section 66474 are Not Supported by Substantial Evidence

Findings made in support of an agency’s decision must be based on evidence contained in the administrative record, which comprises the entire body of evidence presented for consideration in connection with the project, and provides the basis to judge whether sufficient evidence supports the findings and decision of the agency. (*Topanga Association for a Scenic Community v. County of Los Angeles* (1974) 11 Cal.3d 506, 515). A governmental entity “must render

findings sufficient both to enable the parties to determine whether and on what basis they should seek review and, in the event of review, to apprise a reviewing court of the basis of the board's decision." (*Id.* at 514.) Substantial evidence must support an administrative agency's findings and the findings must support the decision." (*Id.*) The findings must "bridge the analytical gap" between the evidence and the decision. (*Id.* at 521.)

Here, substantial evidence does not support that the Project meets the applicable criteria for approval. As noted above, because the conditional use permit findings cannot be made, and because the Project does not comply with PA-1 Specific Plan policies, the proposed development is not consistent with applicable development standards. Furthermore, there is no substantial evidence to substantiate that the site is suitable for the proposed uses. Given inherent risks associated with the operation of gasoline service stations, substantial evidence shows that the design of the subdivision or the proposed improvements is likely to cause substantial environmental damage or substantially and unavoidably injure fish or wildlife or their habitat, as well as create potential public health hazards.

4. The Proposed Conditional Use Permit Findings Required Pursuant to Brentwood Municipal Code Section 17.830.005 are Not Supported by Substantial Evidence

There is no substantial evidence that the location, size, design and operating characteristics of the proposed development will be compatible with and will not adversely affect the livability of appropriate development of abutting properties and the surrounding neighborhood. The evidence of undisclosed and unmitigated project-specific environmental effects, which is discussed at length above, shows that the opposite is likely true.

5. The Proposed Design Review Findings Required Pursuant to Brentwood Municipal Code Section 17.820.007 are Not Supported by Substantial Evidence

There is no substantial evidence that the Project will be harmonious with surrounding development or that it will otherwise meet the required design review findings. Further environmental analysis is needed to substantiate that these findings can be made.

6. The Proposed Master Sign Program Findings Required Pursuant to Brentwood Municipal Code Section 17.640.008.B are Not Supported by Substantial Evidence

There is no evidence that the proposed sign program will comply with applicable code requirements.

7. Conclusion

For the foregoing reasons, the Project is not eligible for a CEQA exemption, and the proposed findings for the above-referenced Project entitlements are not supported by substantial evidence. Accordingly, we urge you to deny the application or, at the very least, to continue this item to allow for further CEQA review.

Anita Roberts, Chairperson
Planning Commission
June 20, 2023
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Please do not hesitate to contact us should you have any questions.

Very truly yours,

A handwritten signature in black ink, appearing to read "Ellis Raskin". The signature is written in a cursive style with a large initial "E" and "R".

Ellis F. Raskin
Senior Counsel

cc: Alexis Morris
Erik Nolthenius
Jennifer Hagen
Katherine Wisinski

Hagen, Jennifer

From: Annette Beckstrand <[REDACTED]>
Sent: Tuesday, June 20, 2023 4:17 PM
To: Web Planning Division
Subject: June 20 - Agenda Item #2

CAUTION – EXTERNAL SENDER

Dear Planning Commissioners:

As a resident of Brentwood, and an active participant in the economic development, public improvement and land use discussions and projects of this City for more than 25 years, I am delighted to see Costco finally coming to Brentwood. I look forward to the jobs and tax dollars this brings to our community. As a result of this projects and it's relative impacts, we will see many benefits. So many more of our residents will be able to work closer to home, obtain much needed products and services closer to home, spendless time on the Highway 4 parking lot, and ultimately have more time and money for their families. I am also aware that it will bring to our City budget a significant amout of additional revenue to augment our Community in a number of ways.

I urge the Planning Commision to vote yes on the Costco application.

Sincerely,

Annette Beckstrand - Resident

Hagen, Jennifer

From: Renee Reed <[REDACTED]>
Sent: Tuesday, June 20, 2023 5:01 PM
To: Web Planning Division
Subject: Costco

CAUTION – EXTERNAL SENDER

Please build it! It's a win for all!

Thank you,
Renee Reed

Sent from my iPhone

Hagen, Jennifer

From: SHEILA REED <[REDACTED]>
Sent: Tuesday, June 20, 2023 5:02 PM
To: Web Planning Division
Subject: COSTCO

CAUTION – EXTERNAL SENDER

I really can't believe you are still arguing over this subject, since the business was supposed to be up and running by the end of the year. If you can dictate the terms of the entry road,, and avoid the hot mess that is the TJ's/In and Out parking lot why wouldn't you?

This would be a huge tax base for our city. We did a write in campaign for TJ's. Please don't keep the community waiting, put something up other than housing. Thanks a bunch Sheila Reed