

RECEIVED
BOARD OF SUPERVISORS
EL DORADO COUNTY
8:29 am, Mar 01, 2011

February 28, 2011

LATE DISTRIBUTION

Date 8:29 am, Mar 01, 2011

VIA EMAIL and FACSIMILE

Board of Supervisors
c/o Clerk of the Board of Supervisors
County of El Dorado, Government Center
330 Fair Lane
Placerville, CA 95667

Planning Department
c/o County of El Dorado Planning Services
2850 Fairlane Court, Building C
Placerville, CA 95667

Re: March 1, 2011 Board of Supervisors Agenda Item No. 32
Appeal of 1/13/11 Planning Commission Determination of
Consistency with Town Center West Development Plan
Our File No. 10093-001

Dear Honorable Supervisors and Planning Department:

We submit this letter on behalf of the appellant Syers Properties III, LLC (“Syers”) in response to the Board of Supervisors Staff Memo dated February 8, 2011, and the letter submitted on behalf of Armstrong Development by Amanda Monchamp dated February 24, 2011. Several statements in both the staff report and Armstrong letter are inaccurate and require correction. Together, they provide no basis to support a determination that the proposed project is “similar in nature” to allowed uses within the Town Center West Planned Development Plan (“TC West Plan”), and ignore several key points raised in the appeal.

1. Planning Commission Made No Findings As Claimed in the Staff Report.

The staff report (at p. 1) purports that the Planning Commission found that the concept of a drug store has changed over the last 15 years since the TC West Planned Development was approved and that drug stores are “no longer locating within strip retail centers ... and are modeled after a stand-alone convenience store.” In fact, the Planning Commission made no findings at all. This comment came from a public speaker representing the developer who requested the compliance determination. In no way did the Commission adopt such a position, nor are these sweeping statements supported whatsoever.

Further, in the original consistency finding, the planning staff member who made the determination (rather than the planning director as required) only determined that a drug store was not among the listed uses in the TC West Development Plan, but – without citing any *evidence* in support – concluded it was similar in nature to the permitted uses.

While the TC West Plan states that the *planning director* can make a finding of consistency in an appropriate situation, this is not such a situation. Here, there is a request to

dramatically expand the allowed uses for TC West without any basis and without processing an amendment or seeking a variance. This request – to allow major retailers selling general merchandise in TC West rather than the limited support retail permitted under the Plan – implicates important determinations of policy; notably, does the County want to allow competing anchor tenants – like a drug store or supermarket – in TC West to compete and cannibalize sales from the approved retail hub that is Town Center East?

This project, if approved, opens the door to the installation of at least three more similar uses of a similar size in TC West. If the County approves a drug store on the basis that it sells a few items that are sold by the permitted retail uses, then it cannot possibly deny a supermarket or any other retail use so long as it includes some items sold by the listed retail uses. Establishment of such a low bar is contrary to the intent of the adopted Plan and constitutes an abuse of discretion. Such a change, if desired, can only be legally approved by processing a major amendment to the Plan including the required public hearing and process.

2. A Drug Store Was a Known Use When the TC West Plan Was Approved and Its Exclusion Was Intentional.

A finding that drug stores are designed differently, even if it were made, would be irrelevant to any consistency determination. There is nothing in the underlying TC West Plan documents which specifies any size for any one kind of retail use (other than an overall cap on total retail square footage). However, what the list of approved “ancillary” uses in “support of” the dominating business park uses clearly omits are general merchandise uses which were commonly known to exist when the TC West Plan was approved, such as a convenience market, drug store and supermarket. These uses were specifically permitted for TC East. Had a drug store, a mini-mart, a liquor store, or even a general merchandise store, been an allowed use for TC West, it would have been so specified as it was in TC East.

Drug stores of many sizes and configurations existed long before and after the approval of the TC West development plan. They were a commonly known use in 1995, as evidenced by their specific inclusion in the TC East Development Plan. Clearly, had the intent been to include a drug store use in TC West, it could have and would have been included in the listed uses. The reason for its exclusion is obvious: a drug store is not an “ancillary” support retail use like those permitted TC West retail uses.

Further, there is nothing unprecedented about the proposed drug store, other than it is purportedly the preferred prototype of the applicant CVS/pharmacy, and that it is dissimilar to the limited retail approved for TC West.

The language that both the staff report and the Armstrong letter cite regarding TC West responding to changing markets and conditions is contained not in the plan itself but in the 1995 Negative Declaration (at pages 10-14) and is taken out of context. That discussion, not surprisingly, relates to the light industrial and manufacturing uses that comprise 96 percent of the TC West Plan area and was the focus of the environmental review. (*See, e.g.*, page 12 of the TC West Environmental Evaluation, finding “the proposed research development or light

manufacturing uses proposed in the development as being consistent with the zoning and specific plan” and not mentioning retail uses at all.)

3. The Town Center East and West Are Related Developments and Must Be Construed Together.

Both the staff report and Armstrong letter claim that TC West is a stand-alone development and therefore it was not error to ignore the TC East approvals. In fact, the staff report goes so far to call TC East “irrelevant.” This statement is astounding coming from a planning department, i.e. to suggest it should ignore any other related planning approvals. While the two neighboring areas could have been developed separately, they were not which is why both the TC West and TC East Plan refer to each other and say that they are “distinct yet complimentary” developments. (See Syers Appeal letter at pp. 2-3.) Any contrary conclusion conflicts with the development history and intent behind the Plans. It is undisputed that both Plans were developed together by the same group of investors, spearheaded by The Mansour Company and processed in the same time frame and pursuant to the same specific plan.

Most important, as noted in Syers’ appeal, both Plans cross-reference each other noting that they are “complimentary” and have distinct but complimentary purposes. (See Syers Appeal letter at pp. 2-3 and Exhibits 2 and 3 thereto [excerpts of the TC West and TC East Design Guidelines and Development Standards].) This language confirms that they were not to be in competition with one another and took each other into account. It also provides the obvious reason that general retail was approved and enumerated for TC East while office, manufacturing and light industry with only limited specific types of retail was identified for in TC West. Hence, the kind of support services allowed in TC West were subordinate to the purposes of office use, and the area was not to be a platform for the same kind of major retail services designated for TC East.

4. The Proposed Project Is Not Similar In Nature To Permitted Uses.

Both the staff report and Armstrong confuse size with use in searching for support for the consistency determination. The issue here is not the size of the proposed store, but the use. Nothing in the list of allowed or suggested uses describes an “anchor”, “department store”, supermarket, drugstore, pharmacy, convenience market, etc. The absence of these types of uses is significant because these were known common retail uses which could have been listed if they were to be uses allowed within the TC West area.

The argument that a proposed use becomes “similar in nature” when it includes or aggregates certain products sold by permitted uses is not supported since it sets up an untenable precedent that removes virtually any limit to what kind of retail use would be allowed. Such a determination is clearly contrary to the letter and spirit of the adopted plan. This is true for several reasons.

First, Armstrong cites the short list of allowed uses under the TC West Plan then asserts that the proposed CVS/pharmacy will include consistent commercial *uses* such as the “*sale*” of

certain enumerated items. However, the proposed “uses” in the underlying documents did not list a pharmacy, a liquor store, or a general merchandise store, etc. The uses listed were in the nature of *limitations*, because there was no general retail or merchandising stores listed. If the County allows the CVS use, there would be no limit in the future because, for example, a grocery store (which is also not listed) sells “food”, newspapers, and magazines. In fact, under Armstrong’s theory, a car wash that sells magazine and snacks would be an allowed use, as would a Home Depot that sells flowers, etc.

A far more reasonable and supportable interpretation is that the uses listed in the TC West Plan are stores whose **primary** purpose was enumerated – or could have been enumerated – at the time the plan was adopted, if it were a purpose then known. The TC West Plan could have easily said a store that sells any of the listed products in any quantity are similar in nature, but it does not. Clearly, the exclusion of drug store, supermarket and other generalized major anchor type stores is simply not “consistent” with the specialized store uses contemplated as a support for the office/industrial park.

Additionally, there is nothing “similar” between a general merchandise store and one that specializes in stationery, or office supplies, etc. The fact that Armstrong claims that the proposed CVS “will not sell general merchandise” (Armstrong letter at p. 16), does not help its cause. There are at least two problems with this statement. First, nothing in any of the permit applications for this project (or prospective permits themselves) contain this limitation, nor has such a commitment been made to the County. In short, this statement is nothing more than an empty, unenforceable promise. Worse, it is demonstrably false.

The objective fact is that the proposed CVS could carry any products typically associated with drug stores which includes, as is evident to anyone, general merchandise. One need only look at the CVS/pharmacy website, to see that it does in fact carry wide variety of general merchandise. (See Exhibit 1 hereto.) Further, similarly-sized CVS stores to the one proposed (such as the one located at 2790 East Bidwell Street in Folsom, which includes a drive-through) advertises general merchandise including toys, home decoration products, photo equipment, DVDs, toiletries, etc. in far greater amounts than office supplies, flowers or stationary that Armstrong and staff claim make it “similar in nature” to the permitted uses. (See Exhibit 2 hereto [advertising flyer for Folsom location].)

5. The Proposed Project Conflicts With the General Plan and Cannot Be Legally Approved Barring an Amendment.

As noted in the appeal, both the County and the applicant admit that the General Plan land use designation and zoning are inconsistent with the proposed use, i.e. a portion of the site is designated and zoned as research and development.

It is elementary that any decision by a city or county affecting land use and development must be consistent with the general plan. See *Citizens of Goleta Valley v. Board of Supervisors* (1990) 52 Cal. 3d 553, 570; *Families Unafraid to Uphold Rural El Dorado County v. County of El Dorado* (1998) 62 Cal.App.4th 1332, 1341-42. In fact, any subordinate land use action that is

not consistent with the county's current general plan is "invalid" at the time it is passed. *Leshar Communications, Inc. v. City of Walnut Creek* (1990) 52 Cal. 3d 531, 544. General Plan and zoning amendments must be done pursuant to state law.

The County General Plan clearly recognizes this fact as well and prohibits the granting of any permit that is inconsistent with the land use designation. Policy 2.2.5.20 states that "[a]ll building permits shall be consistent with the land uses described in the land use designation established for the site, as provided in Policy 2.2.1.2 and set forth on Figure LU-1." *See also* Policy 2.2.5.2 ("No approvals shall be granted unless a finding is made that the project or permit is consistent with the General Plan.")¹

In addition, the proposed retail use represents a "major" change to the TC West Plan since it is contrary to the intent of the development plan (specifying that only limited, ancillary support retail uses be allowed), and allows a previously unpermitted use that is not "similar in nature" to the permitted uses. (*See* Ordinance Code section 17.04.070.) Such a change must be processed as required under the zoning code, including the requisite notice, public hearing and planning commission approval.

Armstrong and staff attempt to convince the Board that the proposal should be approved in order to accommodate CVS's preferred store prototype and because of the construction of a competing Walgreens on the north side of Highway 50. This appeal does not dispute CVS's desire to pursue a particular business strategy, but the County's approved plans should not be distorted in order to accommodate such desires. Rather, CVS may apply for an amendment to the TC West plan if it wants to install a use, like a drug store, that is not "similar in nature" to the approved uses. The point is not whether the County wants to keep CVS as a tenant at Town Center East, but whether the County would ultimately support cannibalizing the planned retail area to support a general merchandise and major retail uses in TC West.

6. Staff and CVS Claim the Proposed Store Is Similar to a Convenience Store.

Both the staff report (at p. 2) and the Armstrong letter (at pp. 3, 6, 15) claim that the proposed store is more in the nature of a convenience market than a traditional drug store. These statements, rather than provide support for the approval, undermine it.

A. Convenience Market Is Not a Permitted Use in TC West.

First, neither a convenience market nor anything similar is listed among the permitted uses in TC West. However, like a drug store, supermarket and other general retail uses, "variety store" and "mini-mart" are expressly listed as allowed retail uses in the TC East Development Plan. (*See* Syers Appeal, Exhibit C and Exhibit 3 thereto at pp. 3, 6.) Therefore, even if one

¹ Further, the permitted uses in the R&D Zone do not include a drug store. (Ordinance Code section 17.35.020.)

believes that a CVS/pharmacy is nothing more than a convenience market, it would not support a conclusion that it is allowed in TC West.

B. The Project Fails to Comply with CEQA.

If, as both staff and Armstrong claim, the proposed store is really akin to a convenience store then it would need to have been analyzed as such from an environmental perspective in the Negative Declaration and Traffic Study that both claim support approval.

However, the 1995 Traffic Study (attached as Exhibit A to the Armstrong letter) is inadequate to support the project. That study, which relied on the I.T.E.'s Trip Generation Manual, estimated the PM trip rate in Planning Area E as 9.61 trips per 1,000 square feet. (See Traffic Study at p. 5.) This rate is well below rates used in the I.T.E. Manual for drug stores. (See Exhibit 3 attached hereto, ITE Trip General Rate PM Peak Hour, listing a Pharmacy/Drug Store with Drive-Through at 10.35 trips per 1,000 square feet.)

However, the difference between the rate used in the traffic study and negative declaration and the appropriate rate for a 24-hour convenience market is far more dramatic. The I.T.E. trip rate for that type of convenience market is 52.41 trips per 1,000 square feet – over 500% higher than the rate used in the traffic study. (See Exhibit 3).²

Thus, even if none of the other 20,000 square feet of retail were developed, the traffic count for a 15,000 square foot convenience store (as staff and the Armstrong purport the project to be) is more than double what the traffic study calculated for 35,000 square feet of retail use. (786 trips compared to 336). As such, the traffic study relied on by the County is inadequate to constitute compliance under CEQA.

Further, that Traffic Study only looked at the traffic intersections internal to project and did not examine impacts at the White Rock/Latrobe road intersection. (See Traffic Study at p. 7)

In addition, the County cannot rely on the now 20-year old EIR done for the El Dorado Hills Specific Plan as the County admits it did not include all of the property that is included in the subject parcel in the specific plan and the EIR. As such, Public Resources Code section 21166 is not applicable, not to mention that the EIR and 16-year-old negative declaration have outlived their useful life. In addition, since the proposal would make changes to the previously approved project additional CEQA review is required as explained in Syers' Appeal letter (at p. 7). As explained therein, the County's determination to allow a qualitatively different retail use (and open the door to other such uses) is clearly a discretionary decision that is at odds with the approved TC West Plan.

² Armstrong's letter incorrectly focuses on retail square footage rather than the type of retail usage which results in traffic generation figures.

Further, additional projects, such as the retail center developed on the southeast corner of Latrobe and White Rock Roads, have been developed in the time since the EIR and negative declaration were approved, thus there has been a change in circumstances. Last, none of the prior documents take into account impacts of global climate change as required under CEQA.

7. Other Inaccuracies.

The Armstrong letter claims (at p. 5) that there have not been a number of consistency determinations in the life of the TC West Development Plan. This is incorrect and not surprisingly they cite no such determinations. However, in one relevant instance described in Syers appeal letter, the planning department and planning commission rejected a proposal by Mansour for a Home Depot as being similar in nature even though a Home Depot, like the CVS sells magazines, flowers, paper products and often includes food sales in the front of stores. In other words, there are no prior consistency determinations for TC West that set a precedent for the one at issue here, the opposite is true.

Finally, the Armstrong letter claims without any support that Syers' application to accommodate a 15,000 square foot drug store pad with a drive through in Town Center East is somehow "suspicious." In truth, such an application is wholly consistent with approvals for TC East and would accommodate the proposed use at issue.

Conclusion

For the reasons stated herein, as well as those set forth in the appeal, we respectfully ask the Board of Supervisors to grant the appeal and find that a drug store is not a permitted use pursuant to the TC West Development Plan.

Very truly yours,

MORGAN MILLER BLAIR



TODD A. WILLIAMS

TAW:st
Attachments

EXHIBIT 1



Search **GO** My List Shopping Cart items: 0 subtot

Baby & Child | **Beauty** | **Household** | **Medicine Cabinet** | **Personal Care** | **Sexual Health** | **Skin Care** | **Vita**

[Home](#) | [Shop](#)

Shopping Directory

Departments

- [Baby & Child](#)
- [Beauty 360](#)
- [Beauty](#)
- [Diet & Nutrition](#)
- [Home Medical](#)
- [Household](#)
- [Medicine Cabinet](#)
- [Natural & Organic](#)
- [Personal Care](#)
- [Sexual Health](#)
- [Skin Care](#)
- [Vitamins](#)

Featured Brands

[View All](#)

- [Sales & Specials](#)
- [FSA Eligible Items](#)
- [Online Only Items](#)
- [Shopping Directory](#)

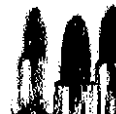
Whether you're searching for household items or natural pro skin care, beauty products or vitamins, you can shop the CVS/pharmacy online store by department, brand or category.

- #### Baby & Child
- Bath & Skin Care
 - Diapers & Wipes
 - Feeding & Nursing
 - Food & Formula
 - Gifts & Toys
 - Health
 - Nursery & Home
 - Pregnancy



- #### Beauty 360
- Bath & Body
 - Fragrance
 - Gifts
 - Hair Care
 - Makeup
 - Men
 - Nail Care
 - Natural
 - Personal Care
 - Skin Care
 - Tools & Accessories

- #### Beauty
- Fragrance
 - Gifts
 - Inner Beauty
 - Makeup
 - Manicure & Pedicure
 - Men's Grooming
 - Salon Hair Care
 - Skin Care
 - Spa



- #### Diet & Nutrition
- Fitness & Yoga
 - Equipment
 - Health & Fitness
 - Monitors
 - Medical Nutrition
 - Nutritional Foods & D
 - Sports Supplements
 - Weight Loss

- #### Home Medical
- Bariatric Care
 - Bathroom Safety
 - Braces & Supports
 - Diabetes Care
 - ExtraCare Advantage for Diabetes
 - Fitness & Rehab
 - Foot Care
 - Hearing Assistance



- #### Household
- As Seen on TV
 - Automotive
 - Bags, Wraps & Storage
 - Batteries & Flashlights
 - Cameras & Film
 - Candles
 - Candy

Home Tests
Hot & Cold Therapy
Incontinence
Respiratory Care
Solutions for Daily Living
Specialty Nutrition
Support Hosiery
Walkers, Wheelchairs & Canes
Wound Care

Cleaning Supplies
Electronics
Food & Snacks
Gifts
Hardware
Hosiery & Underwear
Laundry Supplies
Light Bulbs
Office Supplies
Paper & Plastic Produ
Pet Supplies
Rain Gear
School & Art Supplies
Shoe Care
Small Appliances
Toys & Games
Valentine's Day Shop
Water Filtration

Medicine Cabinet
Allergy & Asthma
Braces & Supports
Cough, Cold & Flu
Diabetes Care
Ear Care
Eye Care
First Aid
Home Tests
Pain & Sleep
Stomach
Stop Smoking



Natural & Organic
Baby & Child
Beauty
Food & Snacks
Household
Medicine Cabinet
Personal Care
Pet Supplies
Skin Care
Vitamins & Supplemer

Personal Care
Bodywash & Soap
Deodorant
Ear Care
Eye Care
Feminine Care
Foot Care
Hair Care
Hair Removal
Incontinence
Lip Care
Men's Hygiene
Oral Care
Shaving
Tissues & Cotton Swabs



Sexual Health
Condoms
Contraceptives
Enhancers
Fertility & Ovulation
Home Tests
Lubricants

Skin Care
Acne Treatments
Bath
Eye Creams

Vitamins
Condition Specific
For Pets
Herbals

Facial Cleansers
Facial Moisturizers
For Men
Hand & Body Lotions
Healthy Skin Care
Scar & Fade Therapy
Sensitive Skin
Sun Care & Outdoor
Supplements



Minerals
Sexual Health
Supplements
Vitamins
Vitamins A to Z

Pharmacy Services

Consultation Corner
Drug Information Center
Health Information Center
New Prescriptions
Refill Prescriptions
Transfer Prescriptions
View/Print Prescription History

Shopping

ExtraCare
My Account
Shopping Directory

Help

Contact Us
Privacy Policy
Return Policy
Shipping Information
Site Map
View All

CVS/pharmacy

CVS Gift Cards
MinuteClinic
CVS Photo
Weekly Store /
Store Locator



[Terms of Use](#) | [Privacy Policy](#) | [Accessibility](#)
© Copyright 1999 - 2011 CVS.com

Questions? Call 888-607-4287

EXHIBIT 2

Close



Your Location: 2790 East Bidwell Street
Folsom, CA 95630
Tel: 983-8719

Prices effective February 27 - March 5

page 1

CVS/pharmacy

5¢ you pay WITH CARD

5.99 after savings

Tide® Liquid Detergent, 20-32 Loads of powder 51-40 loads.

2/6.97 you pay WITH CARD

2/5.97 after savings

Pantene Pro-V® Shampoo, conditioner 12.8 oz. or styler 10-11.5 oz.

buy 1 get 1 FREE (limit 1)

Nature's Blessings® Vitamins or Supplements

spend \$30 get \$10 extra bucks

when you buy any of these P&G products

94¢ you pay WITH CARD

74¢ after savings

Downy® Ultra Care Fabric Softener, 1.5-1.63 gal.

2/2 you pay WITH CARD

2/1.50 after savings

Puffs® 70-88 ct. or pack (not on 60 ct. tissues)

59¢ you pay WITH CARD

4.99 after savings

CoverGirl® Mascara, Lash Definer, Lash Effect, Volume Effect, Exact Eyeliner, Triple or Pro Super Thick.

74¢ you pay WITH CARD

4.99 after savings

Charmin® Basic 12 ct. Ultra Strong or Lake Soft Wet Wipes 10-12 ct.

5¢ you pay WITH CARD

5.99 after savings

Bounty® Basic Paper Towels 3 pk.

5¢ you pay WITH CARD

4.99 after savings

Clairol® Nice'n Easy, Root Touch-up or Gray Solution Hair color (Business Nice'n Easy Foam).

6.00 you pay WITH CARD

3.99 after savings

Oral-B® Electric Toothbrush

you pay WITH CARD

2/2.96 after savings

2/2.94 after extra bucks

General Mills®, Kellogg's® or Quaker® Cereals

12¢ you pay WITH CARD

2.98 after savings

Arrowhead® Paper Towels

sale!

17.99 -city

Bidwell's M&E, Cadam or Inchole 15.99, 10.99 or 11.99 (not on 15.99)

Feb. 27 Mar. 5 SUN, MON, TUE, WED, THU, FRI, SAT

27 28 1 2 3 4 5

allegria allergy available in store March 4th!

Close



Your Location: 2790 East Bidwell Street
Folsom,
CA 95630
Tel: 983-8719

Prices effective February 27 - March 5

page 2

<p>sale! 3/\$12 Limit 6 12 oz cans</p> <p>WITH CARD +CVS Coke 12 oz cans 12 pk. selected varieties.</p>	<p>sale! 1.99</p> <p>WITH CARD +CVS Arizona Tea One gallon.</p>	<p>sale! 99¢</p> <p>WITH CARD Minute Tapioca or Nabisco Keebler crackers, Hallsco cookies or crackers 4.8-6 oz.</p>	<p>sale! 2/\$5</p> <p>WITH CARD Folgers Coffee 11.5 oz. *Useful 11.5 oz 2/\$1 WITH CARD</p>
<p>sale! 88¢ Limit 6 2 liter</p> <p>WITH CARD +CVS Coke 2 liter bottle selected varieties.</p>	<p>wow! 10/\$10</p> <p>WITH CARD Select Grocery or Snack Items as shown. Excludes all party mix.</p>		<p>sale! 3/\$11 Limit 6 11.5 oz</p> <p>WITH CARD +CVS NIP, Condo Dry, AAW or Sun-Bleach 12 oz cans 12 pk. selected varieties.</p>
<p>sale! 3/\$10</p> <p>WITH CARD DiGiorno, Red Baron or Boudier's DiGiorno 6.5" pizza, Red Baron Deep Dish 2 ct. or Boudier's French Bread Pizza 2 ct. selected varieties. Where available.</p>	<p>sale! 10¢ FREE</p> <p>WITH CARD Welch's, Jif, Hunt's or Chef Boyardee Grape Jelly 3.2 oz. peanut butter 18 oz, Snack Pack pudding 4 pk. or Jif Employees 1.5-1.5 oz.</p>	<p>sale! 2/\$4</p> <p>WITH CARD Dreyer's Maxx, Nestle or Huggin'-Dogg Maxx 18 oz. Maxx. US Open Club any or selected varieties 3-7 oz. Where available.</p>	<p>sale! 2/\$6</p> <p>WITH CARD Dreyer's Fruit Bars, Skinny Cow Ice Cream Sandwich or Truffle Bars 4 ct.</p>
<p>sale! 1.99</p> <p>WITH CARD Snacka Cheerios, Fritos 8.5-8.5 oz. On the Border 11.5 oz, Clubhouse Sandwich 12 oz or Gold Pops 11 oz.</p>	<p>sale! 2.99</p> <p>WITH CARD French's French Fry Sauce 8 oz.</p>	<p>sale! 1.99</p> <p>WITH CARD Gold Medal All Purpose Flour 6 lbs.</p>	<p>sale! 2.79</p> <p>WITH CARD Gold Emblem Sugar 5 lbs.</p>
<p>sale! 2/\$5</p> <p>WITH CARD Sara Lee Soft & Smooth Bread Whole or wheat 20 oz.</p>	<p>sale! 5/\$5</p> <p>WITH CARD +CVS Glaxo Vitamin Water 20 oz, selected varieties Smartwater 11. Flatz 18.5 oz, selected varieties.</p>	<p>sale! 2.99</p> <p>WITH CARD Tostitos 10-11 oz selected varieties.</p>	<p>sale! 2.79 Limit 5</p> <p>WITH CARD Crystal Orange Juice 1.5 liter. 1 liter deposit where required.</p>

SNAP We Accept SNAP Benefits CVS is an equal opportunity provider. U.S. Department of Agriculture Food and Nutrition Service.

sale! 1.99 WITH CARD Gold Emblem Pina Colada 1.99 12 oz. 12 pk.

sale! 2/\$3 WITH CARD Gold Emblem Crackers 12 oz. 2 pk. or 2 pk. 12 oz. 12 pk.

sale! 3.99 WITH CARD Gold Emblem Nuts 2.99 16 oz. 12 pk. or 16 oz. 12 pk.

sale! 77¢ WITH CARD Gold Emblem Soda 1.77 12 oz. 12 pk.

Gold Emblem SALE!

sale! 88¢ WITH CARD Gold Emblem Spices 1.88 1.5 oz. 12 pk.

sale! 10/\$10 WITH CARD Gold Emblem Caramel Popcorn 1.00 1.5 oz. 10 pk.

sale! 10/\$10 WITH CARD Gold Emblem Fruit Punch 1.00 1.5 oz. 10 pk.

wow! 4.99 WITH CARD Gold Emblem Juice 4.99 1.5 oz. 12 pk.

sale! 2/\$5 WITH CARD Gold Emblem Juice 2.50 1.5 oz. 12 pk.

sale! 2/\$3 WITH CARD Pringles 2.99 1.5 oz. 12 pk.

sale! 6.99 WITH CARD Starbucks VIA or Splenda Ready Brew 6.99 1.5 oz. 12 pk.

sale! 2/\$4 WITH CARD Quaker Quick Oats 1.99 1.5 oz. 12 pk.

sale! 2.99 WITH CARD Coffee-Mats or Wesson Coffee 2.99 1.5 oz. 12 pk.

CVS/pharmacy

Close



Your Location: 2790 East Bidwell Street
 Folsom,
 CA 95630
 Tel: 983-8719

Prices effective February 27 - March 5

page 4

sale! 88¢
 With CARD Gold Emblem Candy 2.5-9.5 oz 632

sale! 2/\$5
 With CARD Hershey's Pieces 3-10.5 oz.

sale! 2/\$5
 With CARD Hershey's Easter Assorted 6-10 oz.

sale! 88¢
 With CARD Nips 1 oz.

spend \$10 get \$3 extra bucks when you buy Dove, Mars, Good&Beautiful or Wrigley's as shown

sale! \$6
 With CARD Mars Enlar 4.5-10.5 oz 62

sale! 2/\$5
 With CARD Easter M&M's 2.5-4.5 oz

sale! \$1
 With CARD Mars King 2.5oz Assorted 101 6-33 62

sale! 2/\$6
 With CARD Mars or Wrigley's Novelty 10.5 oz 62

sale! 2/\$6
 With CARD Mars M&M's Assorted 10.5 oz 62

sale! 2/\$6
 With CARD Dove 10.5 oz 62

sale! 2/\$4.99
 With CARD Wrigley's Doublemint 10.5 oz 62

sale! FREE
 With CARD Cadbury Chocolate Bar 3.5-4 oz.

sale! 88¢
 With CARD Enlar Candy Assorted 0.5-1.5 oz.

sale! 88¢
 With CARD Palmer or Gold Emblem Baggod Easter Candy 4-5 oz.

sale! 2/\$6
 With CARD Hershey's Bliss 4-10 oz.

sale! 2.99
 With CARD Bolt Peppermint Puffs 20 oz.

sale! 2/\$4
 With CARD Almond Roce Sugar Prob 2.5 oz.

sale! 2/\$5
 With CARD Werther's Original or Riesen 10 oz.

sale! 2/\$5
 With CARD Ice Breakers Ice Cubes Sugarfree gum 42 oz.

\$20 OFF **wow! 9.99** **LED Flameless Lantern or 4 Pc. Solar LED Landscape Lighting**

prices starting at 1.99 **WILDCAND Color Spot** **Impresses & personalizes, one garden or patio table, window or vegetable, 4 pc. Where available.**

wow! 4.99 **Select Springtime Toys**

sale! 25% OFF **reg. or retail** **WIND CHIMES** **Wind Chimes (includes Post-It Notepad)**

SPRING SAVINGS!

sale! 99.99 **With Care Craig 13" HD LCD TV** **Model may vary. CA wireless fee will be charged at point of purchase.**

Hallmark Recordable Storybook **Your voice on every page.**

sale! 25% OFF **reg. or retail** **With Care Easter Animations or Home Decor / Includes wire bunny, wicker basket, get things or bunny that sing and more. (includes 1000 Post-It Notes)**

wow! 9.99 **Apparel Value Pack**

prices starting at 6.99 **With Care Zhu Zhu Babies or Puppies**

Buy 1 Get 1 50% OFF **With Care Adult or Children's Sunglasses** **(includes AS1 V.A. - Glasses)**

CVS/pharmacy

Close X



Your Location: 2790 East Bidwell Street
Folsom,
CA 95630
Tel: 983-8719

Prices effective February 27 - March 5

page 6

sale! 8.99
WITH CARD
L'Oréal
Healthy Look
Sublime
Mousse Hair
Color

**buy 1 get 1
50% OFF**
WITH CARD
Biolage Shampoo,
conditioner 15.5 oz
or hair spray 10.0 oz.

sale! 14.99
WITH CARD
Conair
Instant Heat
Curling Iron

sale! 5.99
WITH CARD
Clinal Natural
Instincts
Hair Color

sale! 3/\$10
WITH CARD ALL 91, Inea
or Noxzema Skin Care

WOW! 77¢
WITH CARD
NOS Shampoo
or conditioner 15 oz.

spend \$20 get \$10 extra bucks
when you buy these Nexxus products
Extra Bucks offer valid 1/28/11-3/5/11. See store for details.

**Softsoap
Body Wash 15-18 oz.**
you pay 2.99
WITH CARD
or 10 extra bucks* 2.99
reward

99¢
after extra bucks
Extra Bucks offer limited to one
purchase with card. (1/28/11-3/5/11)

**buy 1 get 1
50% OFF**
WITH CARD
Conair or
Scunci Manic
hair shears, rollers,
or clips and more

**buy 1 get 1
50% OFF**
WITH CARD Gold Bond
Lotion, cream, salt or molasses
2.7-14 oz or powder 4-10 oz.

**buy 1 get 1
50% OFF**
WITH CARD Bio
Disposable
Scissors 3-12 ct

sale! 3/\$10
WITH CARD ALL Tresseme
WITH CARD Motions Shampoo,
conditioner 4-11 oz or styling 2-12 oz
Excludes Relaxer Mail.

Close



Your Location: 2790 East Bidwell Street
 Folsom,
 CA 95630
 Tel: 983-8719

Prices effective February 27 - March 5

page 8

Get over \$131 in coupon savings!

 <p>2400 you pay WITH CARD -500 extra bucks* reward for next purchase -300 off coupon 16.99 after savings</p> <p>Prilosec OTC 42 ct. <small>Extra Bucks* offer limit of 2 per household with card. 11/03/10-3/31/11</small></p>	 <p>700 you pay WITH CARD -100 extra bucks* reward for next purchase -300 off coupon 3.99 after savings</p> <p>Clairol Nice'n Easy Color Blend Foam Hair Color <small>Extra Bucks* offer limit of 2 per household with card. 11/03/10-3/31/11</small></p>	 <p>900 you pay WITH CARD -400 extra bucks* reward for next purchase -400 off coupon 1.99 after savings</p> <p>Gillite Fusion Pro OxiDe Powder or manual razor 1 ct. <small>Extra Bucks* offer limit of 1 per household with card. 11/03/10-3/31/11</small></p>
--	--	---

HAVE YOU TRIED THIS YET?

 <p>204 you pay WITH CARD -25 off coupon 2.89 after savings</p> <p>Cascade Gel or powder 45 oz.</p>	 <p>500 you pay WITH CARD -20 off coupon 5.79 after savings</p> <p>Dority or Bounce Liquid 62-68 loads or 100 oz. 120 cc.</p>	 <p>670 you pay WITH CARD -200 extra bucks* reward for next purchase -100 off coupon 3.79 after savings</p> <p>Oily Body wash 20 oz. 12.5 oz. 16 oz. 18 oz. 25 oz. 33 oz. or 10.5 oz. 12.5 oz. 15.2 oz. <small>Extra Bucks* offer limit of 1 per household with card. 11/03/10-3/31/11</small></p>
 <p>400 you pay WITH CARD -100 off coupon 3.99 after savings</p> <p>Fabreze Fabric Refresher 37 oz.</p>	 <p>200 you pay WITH CARD -100 off coupon 1.99 after savings</p> <p>Fabreze Aerosol Set & Refresh 2.7 oz. 4.5 oz. 1 ct.</p>	 <p>1900 you pay WITH CARD -500 off coupon 14.89 after savings</p> <p>Swiffer WetJet Trigger Jet</p>


Extra Bucks offer limit of 2 per household with card. 11/03/10-3/31/11



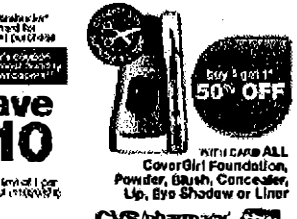
11-0155

Get over \$131 in coupon savings!

	<p>Molamell Power 114 Douze, 1 doz 8.99ea 14 ct. (12oz) 120-160 ct. or Clear & Natural 5.7 douze.</p> <p>99¢ you pay WITH CARD</p> <p>10¢ off coupon (10¢ off) (10¢ off)</p> <p>8.99 after savings</p>		<p>Pampers Baby Dry, Swaddlers or Cruisers Diapers 41-99 ct.</p> <p>19.99 you pay WITH CARD</p> <p>20¢ off coupon (20¢ off) (20¢ off)</p> <p>17.99 after savings</p>		<p>Pantene or Head & Shoulders Shampoo, Conditioner 8.5-12.5 oz, wash 7.0 oz, hair 3.5 oz or Head & Shoulders 12.5-14.2 oz.</p> <p>4.99 you pay WITH CARD</p> <p>10¢ off coupon (10¢ off) (10¢ off)</p> <p>3.99 after savings</p>
---	---	---	---	--	--

Check most Sunday papers for coupon savings when you try these P&G products!

	<p>Always Pads 14, 24 ct or pantolines 28-60 ct. (includes sanitary and Quaternary Protection).</p> <p>2.99 you pay WITH CARD</p> <p>50¢ off coupon (50¢ off) (50¢ off)</p> <p>2.49 after savings</p>		<p>\$2 get extra books when you buy Old Spice Pro Strength, Secret or Gillette Clinical Strength</p>	 <p>save \$10</p>
---	--	---	---	--

	<p>sale! 3.99</p> <p>WITH CARD</p>	 <p>SAVE \$10 when you buy a 1 ct. Venus razor and 4-8 ct. Venus cartridge together!</p>	<p>500 extra bucks earned by P&G (not cash)</p> <p>5.99 with coupon (5.99) (5.99)</p> <p>save \$10</p>	 <p>Buy 1 get 1 50% OFF</p> <p>WITH CARD ALL CoverGirl Foundation, Powder, Blush, Concealer, Lip, Eye Shadow or Liner</p>
---	--	--	---	---

*To receive this \$10 you must be present at time of purchase.

CVS/pharmacy

Close 



Your Location: 2790 East Bidwell Street
Folsom,
CA 95630
Tel: 983-8719

Prices effective February 27 - March 5

page 10

	<p>spend \$10 get \$3 extra bucks when you buy ANY L'Oréal Lip Color</p>		<p>you pay WHILE YOU WAIT! \$2.00 \$7.99 after extra bucks</p>
<p>LAOCHIC ROSE ANTHELIOS SK VICHY LIFTACTIV G.P. NIGHT</p>	<p>spend \$10 get \$3 extra bucks when you buy Maybelline Cosmetics shown here</p> <p>Extra Bucks offer limit of 1 per household with card #11615000</p> <p>MAYBELLINE NEW VOICE</p> <p>NEW NOW</p> <p>Maybelline Fit Me foundation, powder, blush, concealer, Superstay lip gloss, Expert Wear eye shadow or One-By-One mascara.</p>	<p>PHYSICIANS FORMULA</p> <p>spend \$10 get \$7 extra bucks when you buy ANY Physicians Formula Cosmetics</p>	
<p>NEW NOW Essie Nail Color Treatment</p> <p>essie</p>	<p>Buy 1 get 1 50% OFF WITH CARD Neutrogena Lip, Eye or Skin Care products with card with card</p>	<p>Buy 1 get 1 50% OFF WITH CARD ALL Revlon Nail</p>	

10



sale!
6.99

WITH CARD
Clay
Mask
1.5 oz. (42 g)
\$7.99 (11/11/11)
or \$6.99 (11/18/11)



spend \$15
get \$5 extra
bucks
when you buy
CVS/pharmacy Skin Care,
Hair Care or Cosmetics
(excludes sun care)
WITH CARD (11/18/11)



sale!
99¢

WITH CARD
Saffron
or Irish
Spring
Soap
6.25 oz. (177 g)
or 2.5 oz. (70 g)

spend \$15 get \$5 extra bucks
when you buy Dove, Degree, Caress, Lever, Vaseline or Afta products shown below

Extra Bucks® offer limit of 1 per household with card. (11/18/11)



sale!
2/\$9

WITH CARD
Afta Shampoo
18 oz. (510 g)
2.84 oz. (81 g), Afta
Shower gel or
Deodorant



sale!
\$6

WITH CARD
Caresse, Dove
or Lever Bar
Soap 6-8 pk. or
Other body wash
16-24 oz.



sale!
2/\$6

WITH CARD
Dove Shampoo,
Conditioner,
17 oz. or 3.5 oz.
1.9-2.5 oz.



sale!
\$6

WITH CARD
Vaseline Body
Lotion 24.6 oz. or
gel Body oil or
Moisturizing Body
oil 8.6 oz.



sale!
2/\$7

WITH CARD
Dove or
Degree
Ultimate Care
Clear deodorant
2.6-3.1 oz. Dove
body cream or
Hair Care
2.7-3.5 oz.



sale!
4.99

WITH CARD
Dove
Hair Care
Body
and hair
wash 13.6 oz.

get \$5 extra
bucks
when you buy (2)
Nutrafol
Sun care or sulfate shaving
9.4-8.7 oz.

Excludes products that are
already on sale. (11/18/11)



buy 1 get 1
50% OFF

WITH CARD Select
Women's or
Men's Designer
Fragrance with
a 1.5 oz. or 1.7 oz. of
10.9-4.10



spend \$20
get \$5 extra
bucks
when you buy
Lumene Skin Care or Any
Skin Effects

Extra Bucks® offer limit of 1 per household with card. (11/18/11)



save
\$2

WITH CARD
Natural
Glow
Body
oil

CVS/pharmacy 

Close



Your Location: 2790 East Bidwell Street
 Folsom,
 CA 95630
 Tel: 983-8719

Prices effective February 27 - March 5

page 12

flu alert!

GET YOUR FLU SHOT BEFORE THE FLU GETS YOU!

See the pharmacy counter

Many insurance plans accepted including United Health, Aetna, CIGNA & Medicare Part B*

<p>Cherry</p> <p>sale! 1.99</p> <p><small>with CVS card</small></p>	<p>DAYL</p> <p>sale! 6.99</p> <p><small>with CVS card</small></p>	<p>Breathe Right</p> <p>sale! 9.99</p> <p><small>with CVS card</small></p>	<p>Nicorette</p> <p>save \$5</p> <p><small>with CVS card</small></p>
<p>Claritin</p> <p>sale! 15% PRICE CUT! 19.79</p> <p><small>with CVS card</small></p>	<p>Ensure</p> <p>6.99 you pay WITH CARD</p> <p>3.99</p> <p><small>with CVS card</small></p>		<p>Depend</p> <p>sale! 11.99</p> <p><small>with CVS card</small></p>
<p>Zyrtec</p> <p>sale! 18.99</p> <p><small>with CVS card</small></p>	<p>Ensure</p> <p>6.99 you pay WITH CARD</p> <p>3.99</p> <p><small>with CVS card</small></p>		<p>Feminine Care</p> <p>sale! 3.99</p> <p><small>with CVS card</small></p>
<p>Advil</p> <p>buy 1 get 1 50% OFF</p> <p><small>with CVS card</small></p>	<p>EXCEDRIN</p> <p>EXTRA STRENGTH</p> <p>EXCEDRIN MIGRAINE</p>	<p>spend \$20 get \$10 extra bucks when you buy ANY Excedrin</p>	<p>TENA</p> <p>sale! 9.99</p> <p><small>with CVS card</small></p>

*CVS and Card-Member prices containing manufacturer discounts are subject to federal and state surcharge requirements and limits. Available while quantities last. Prices shown with a CVS pharmacy card. Excludes taxes and other charges. ©2011 CVS Health Corporation. All rights reserved. CVS, the CVS logo and the CVS Health logo are trademarks of CVS Health Corporation. All other trademarks are the property of their respective owners.

11-0155 L.24

http://cvs.shoplocal.com/cvs/default.aspx?action=printcirculardpage&storeid=2596693&im... 2/28/2011 11-0155 L.24

ALLEGRA COMING SOON! Sign up for Pollen Count Alerts at www.cvs.com/allegra
 When pollen counts go up, you get extra SAVINGS on Allegra!

Allegra Allergy

Centrum sale! **6.99**

align **32.99** (After extra bucks)

Zone buy one! **FREE**

ThermaCare spend \$10 get **\$4** extra bucks when you buy ANY ThermaCare Heat Wraps

Calcium buy 1 get 1 **FREE**

Fish Oil buy 1 get 1 **FREE**

Revitalens Multi-purpose solution 4 oz. you pay **5.99** WITH CARD extra bucks* reward **5.99** **FREE** After \$10.00

alli sale! **49.99**

I-Caps buy 1 get 1 **50% OFF**

sale! **11.99**

buy 1 get 1 50% OFF

CVS/pharmacy

Close



Your Location: 2790 East Bidwell Street
Folsom,
CA 95630
Tel: 983-8719

Prices effective February 27 - March 5

page 14

AS SEEN ON TV don't pay shipping and handling!



<p>wow! 2/\$10</p> <p>WITH CARD Absorbent Housewares</p>	<p>sale! 3.99</p> <p>WITH CARD Febreze Fabric Refresher 1 ct.</p>	<p>sale! 3.99</p> <p>WITH CARD Swiffer Sweeper 123 Wet, Sweeper and spray cloths 12-3 ct.</p>	<p>wow! 4/\$10</p> <p>WITH CARD Deluxe Fleece Throw 50x60</p>
<p>sale! 3/\$10</p> <p>WITH CARD Foldable Storage Crate or Shallow Tote</p>	<p>Buy 1 get 1 FREE</p> <p>WITH CARD Arm & Hammer Total Care 1.5 gal. or 42 oz. or liquid laundry detergent 25-32 loads.</p>	<p>wow! 14.99</p> <p>WITH CARD Home Exclusive Storage Ottoman, 3.99! look like a laptop desk.</p>	<p>sale! 3.99</p> <p>WITH CARD Bounce or Tide Dryer bar 1 ct., Stain Release liquid 25-31 oz. or booster pac 10 ct.</p>
<p>sale! 2/\$7</p> <p>WITH CARD Purina or Dingo T Bone, Roast, Turkey, or Chicken 5 lb. or 2.5 lb. x 2.</p>	<p>sale! 5/\$3</p> <p>WITH CARD Fancy Feast Canned 3 oz.</p>	<p>sale! 9.99</p> <p>WITH CARD Duracell AAA, AA, D, C, D, 9A, or 9-A 4 PA. Batteries.</p>	<p>sale! 3.99</p> <p>WITH CARD CVS/pharmacy Batteries AAA, AA, 1.5 AA, C, D 4 PA. 2x3 vol. 2 ea.</p>

Close



Your Location: 2790 East Bidwell Street
Folsom,
CA 95630
Tel: 983-8719

Prices effective February 27 - March 5

page 16

 Beck's Beer 12 Pack 12 x 12 oz cans 12 pack sale! 11.99	 Stella Artois Beer 12 Pack 12 x 12 oz cans 12 pack sale! 12.99	 Blue Moon Beer 12 Pack 12 x 12 oz cans 12 pack sale! 10.99	 Keystone Light Beer 12 Pack 12 x 12 oz cans 12 pack sale! 14.99	
 SKYY Vodka 1.5L sale! 22.99	 1880 Tequila 1.5L sale! 28.99	 Grey Goose Vodka 1.5L sale! 28.99	 10% OFF On 2 or more bottles of any brand of wine 12 pack sale! 9.99	 Chateau de Noailles Vodka 1.5L sale! 14.99
 Bellevue Irish Whiskey 1.5L sale! 17.99	 Bombay Sapphire Gin 1.5L sale! 19.99	 B.V. Coastal Vodka 1.5L sale! 6.99	 Robert Mondavi Wine 1.5L sale! 7.99	
 Kahlua Liqueur 1.5L sale! 14.99	 J&B Scotch Whisky 1.5L sale! 15.99	 Redwood Creek Liqueur 1.5L sale! 2/10	 Turning Leaf Wine 1.5L sale! 5.99	
 Ketchikan Blended Whiskey 1.5L sale! 12.99	 New Amsterdam Gin 1.5L sale! 9.99	 Franzia Wine 1.5L sale! 2/6	 Woodbridge Wine 1.5L sale! 8.99	

EXHIBIT 3

**INSTITUTE OF TRANSPORTATION ENGINEERS
TRIP GENERATION RATE (PM Peak Hour)**

(Trip Generation Manual, 8th Edition)

Code	Description	Unit of Measure	Trips Per Unit
PORT AND TERMINAL			
30	Truck Terminal	Acres	6.55
90	Park and Ride Lot with Bus Service	Parking Spaces	0.62
INDUSTRIAL			
110	General Light Industrial	1,000 SF	0.97
120	General Heavy Industrial	Acres	2.16
130	Industrial Park	1,000 SF	0.86
140	Manufacturing	1,000 SF	0.73
150	Warehousing	1,000 SF	0.32
151	Mini-Warehouse	1,000 SF	0.26
152	High-Cube Warehouse	1,000 SF	0.10
170	Utilities	1,000 SF	0.76
RESIDENTIAL			
210	Single-Family Detached Housing	Dwelling Units	1.01
220	Apartment	Dwelling Units	0.62
230	Residential Condominium / Townhouse	Dwelling Units	0.62
240	Mobile Home Park	Dwelling Units	0.59
251	Senior Adult Housing - Detached	Dwelling Units	0.27
252	Senior Adult Housing - Attached	Dwelling Units	0.16
253	Congregate Care Facility	Dwelling Units	0.17
254	Assisted Living	Beds	0.22
255	Continuing Care Retirement Community	Dwelling Units	0.29
LODGING			
310	Hotel	Rooms	0.59
320	Motel	Rooms	0.47
330	Resort Hotel	Rooms	0.42
RECREATIONAL			
411	City Park	Acres	0.16
412	County Park	Acres	0.06
413	State Park	Acres	0.07
415	Beach Park	Acres	1.30
416	Campground / Recreation Vehicle Park	Camp Sites	0.37
417	Regional Park	Acres	0.20
420	Marina	Berths	0.19
430	Golf Course	Acres	0.30
431	Miniature Golf Course	Holes	0.33

Code	Description	Unit of Measure	Trips Per Unit
432	Golf Driving Range	Tees / Driving Positions	1.25
433	Batting Cages	Cages	2.22
435	Multi-Purpose Recreational Facility	Acres	5.77
437	Bowling Alley	1,000 SF	3.54
441	Live Theater	Seats	0.02
443	Movie Theater without Matinee	1,000 SF	6.16
444	Movie Theater with Matinee	1,000 SF	3.80
445	Multiplex Movie Theater	1,000 SF	4.91
452	Horse Race Track	Acres	4.30
454	Dog Race Track	Attendance Capacity	0.15
460	Arena	Acres	3.33
473	Casino / Video Lottery Establishment	1,000 SF	13.43
480	Amusement Park	Acres	3.95
488	Soccer Complex	Fields	20.67
490	Tennis Courts	Courts	3.88
491	Racquet / Tennis Club	Courts	3.35
492	Health / Fitness Club	1,000 SF	3.53
493	Athletic Club	1,000 SF	5.96
495	Recreational Community Center	1,000 SF	1.45
INSTITUTIONAL			
520	Elementary School	1,000 SF	1.21
522	Middle School / Junior High School	1,000 SF	1.19
530	High School	1,000 SF	0.97
536	Private School (K-12)	Students	0.17
540	Junior / Community College	1,000 SF	2.54
580	Church	1,000 SF	0.55
585	Daycare Center	1,000 SF	12.46
588	Cemetery	Acres	0.84
571	Prison	1,000 SF	2.91
590	Library	1,000 SF	7.30
591	Lodge / Fraternal Organization	Members	0.03
MEDICAL			
610	Hospital	1,000 SF	1.14
620	Nursing Home	1,000 SF	0.74
630	Clinic	1,000 SF	5.18
640	Animal Hospital / Veterinary Clinic	1,000 SF	4.72

Code	Description	Unit of Measure	Trips Per Unit
OFFICE			
710	General Office Building	1,000 SF	1.49
714	Corporate Headquarters Building	1,000 SF	1.40
715	Single Tenant Office Building	1,000 SF	1.73
720	Medical-Dental Office Building	1,000 SF	3.46
730	Government Office Building	1,000 SF	1.21
732	United States Post Office	1,000 SF	11.12
733	Government Office Complex	1,000 SF	2.85
750	Office Park	1,000 SF	1.48
760	Research and Development Center	1,000 SF	1.07
770	Business Park	1,000 SF	1.29
RETAIL			
812	Building Materials and Lumber Store	1,000 SF	4.49
813	Free-Standing Discount Superstore	1,000 SF	4.61
814	Specialty Retail Center	1,000 SF	2.71
815	Free Standing Discount Store	1,000 SF	5.00
816	Hardware / Paint Store	1,000 SF	4.84
817	Nursery (Garden Center)	1,000 SF	3.80
818	Nursery (Wholesale)	1,000 SF	5.17
820	Shopping Center	1,000 SF	3.73
823	Factory Outlet Center	1,000 SF	2.29
841	New Car Sales	1,000 SF	2.59
843	Automobile Parts Sales	1,000 SF	5.98
848	Tire Store	1,000 SF	4.15
850	Supermarket	1,000 SF	10.50
851	Convenience Market (Open 24 Hours)	1,000 SF	52.41
852	Convenience Market (Open 15-16 Hours)	1,000 SF	34.57
853	Convenience Market with Gasoline Pumps	1,000 SF	59.69
854	Discount Supermarket	1,000 SF	8.90
857	Discount Club	1,000 SF	4.24
860	Wholesale Market	1,000 SF	0.88
861	Sporting Goods Superstore	1,000 SF	3.10
862	Home Improvement Superstore	1,000 SF	2.37
863	Electronics Superstore	1,000 SF	4.50
864	Toy / Children's Superstore	1,000 SF	4.99
868	Pet Supply Superstore	1,000 SF	3.38
867	Office Supply Superstore	1,000 SF	3.40
875	Department Store	1,000 SF	1.78

Code	Description	Unit of Measure	Trips Per Unit
876	Apparel Store	1,000 SF	3.83
879	Arts and Craft Store	1,000 SF	6.21
880	Pharmacy / Drugstore without Drive-Through Window	1,000 SF	8.42
881	Pharmacy / Drugstore with Drive-Through Window	1,000 SF	10.35
890	Furniture Store	1,000 SF	0.45
896	Video Rental Store	1,000 SF	13.60
SERVICES			
911	Walk-In Bank	1,000 SF	12.13
912	Drive-In Bank	1,000 SF	25.82
925	Drinking Place	1,000 SF	11.34
931	Quality Restaurant	1,000 SF	7.49
932	High-Turnover (Sit-Down) Restaurant	1,000 SF	11.15
933	Fast Food Restaurant without Drive-Through Window	1,000 SF	28.15
934	Fast Food Restaurant with Drive-Through Window	1,000 SF	33.84
935	Fast Food Restaurant with Drive-Through Window and No Indoor Seating	1,000 SF	153.85
936	Coffee / Donut Shop without Drive-Through Window	1,000 SF	40.75
937	Coffee / Donut Shop with Drive-Through Window	1,000 SF	42.93
938	Coffee / Donut Shop with Drive-Through Window and No Indoor Seating	1,000 SF	75
940	Bread / Donut / Bagel Shop with Drive-Through Window	1,000 SF	19.56
941	Quick Lubrication Vehicle Shop	Service Bays	5.19
942	Automobile Care Center	1,000 SF	3.38
943	Automobile Parts and Service Center	1,000 SF	4.48
944	Gasoline / Service Station	Fueling Positions	13.87
945	Gasoline / Service Station with Convenience Market	Fueling Positions	13.38
946	Gasoline / Service Station with Convenience Market and Car Wash	Fueling Positions	13.94
947	Self Service Car Wash	Stalls	5.54
948	Automated Car Wash	1,000 SF	14.12

Note: All land uses in the 800 and 900 series are entitled to a "passby" trip reduction of 60% if less than 50,000 ft² or a reduction of 40% if equal to or greater than 50,000 ft².

* Approximated by 10% of Weekday average rate.