# Exhibit D-2 – 2024 Final Environmental Impact Report

**Costco Commercial Center Project**
**Conditional Use Permit Application No. P21-01959**
**Plan Amendment and Rezone Application No. P21-01960**
**Conditional Use Permit Application No. P21-03251**
**Planned Development Permit Application No. P21-03252**
7120 North Riverside Drive Fresno, CA 93722
APN: 503-020-12

Final Environmental Impact Report

# Fresno Costco Commercial Center Project

State Clearinghouse No. 2021100443

Prepared for:

City of FRESNO

Planning and Development Department

January 2024











Final Environmental Impact Report

# Fresno Costco Commercial Center Project

State Clearinghouse No. 2021100443

**Prepared for:**

City of FRESNO

**Planning and Development Department**
2600 Fresno Street, Third Floor, Room 3043
Fresno, California 93721

Contact:

**Jose Valenzuela**
Supervising Planner
559.621.8070

**Prepared by:**

ASCENT

**Ascent Environmental**
455 Capitol Mall, Suite 300
Sacramento, CA 95814

Contact:

**Jessica Babcock**
Project Manager
916.444.7301

**January 2024**

20210052.01

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# LIST OF ABBREVIATIONS

| | |
|---|---|
| Caltrans | California Department of Transportation |
| CAPCOA | California Air Pollution Control Officers Association |
| CARB | California Air Resources Board |
| CCR | California Code of Regulations |
| CDFW | California Department of Fish and Wildlife |
| Central Valley RWQCB | Central Valley Regional Water Quality Control Board |
| CEQA | California Environmental Quality Act |
| COG | Council of Governments |
| dB | decibels |
| Draft EIR | draft environmental impact report |
| EV | electric vehicle |
| Final EIR | final environmental impact report |
| FMFCD | Fresno Metropolitan Flood Control District |
| GHG | greenhouse gas |
| GHGRP | City of Fresno Greenhouse Gas Reduction Plan |
| ITP | incidental take permit |
| $L_{eq}$ | Equivalent Continuous Sound Level |
| PG&E | Pacific Gas and Electric Company |
| PRC | Public Resources Code |
| project | Costco Commercial Center |
| RTP/SCS | Regional Transportation Plan/Sustainable Communities Strategy |
| SB | Senate Bill |
| SENL | single-event noise level |
| SJVAPCD | San Joaquin Valley Air Pollution Control District |
| SR | State Route |
| SWRCB | State Water Resource Control Board |
| TDM | Transportation Demand Management |
| TIA | transportation impact analysis |
| UWMP | urban water management plan |
| VMT | vehicle miles traveled |

# 1 INTRODUCTION

This final environmental impact report (Final EIR) has been prepared by the City of Fresno, as lead agency, in accordance with the requirements of the California Environmental Quality Act (CEQA) and the State CEQA Guidelines (CCR Section 15132). This Final EIR contains responses to comments received on the draft environmental impact report (Draft EIR) for the Costco Commercial Center (project). The Final EIR consists of the Draft EIR and this document (response to comments document), which includes comments on the Draft EIR, responses to those comments, and revisions to the Draft EIR.

## 1.1 PURPOSE AND INTENDED USES OF THIS FINAL EIR

CEQA requires a lead agency that has prepared a Draft EIR to consult with and obtain comments from responsible and trustee agencies that have jurisdiction by law with respect to the project, and to provide the public with an opportunity to comment on the Draft EIR. The Final EIR is the mechanism for responding to these comments. This Final EIR has been prepared to respond to comments received on the Draft EIR, which are reproduced in this document; and to present corrections, revisions, and other clarifications and amplifications to the Draft EIR, including project updates, made in response to these comments and as a result of the applicant's ongoing planning and design efforts. The Final EIR will be used to support the City's decision regarding whether to approve the Costco Commercial Center project.

This Final EIR will also be used by CEQA responsible and trustee agencies to ensure that they have met their requirements under CEQA before deciding whether to approve or permit project elements over which they have jurisdiction. It may also be used by other state, regional, and local agencies that may have an interest in resources that could be affected by the project or that have jurisdiction over portions of the project.

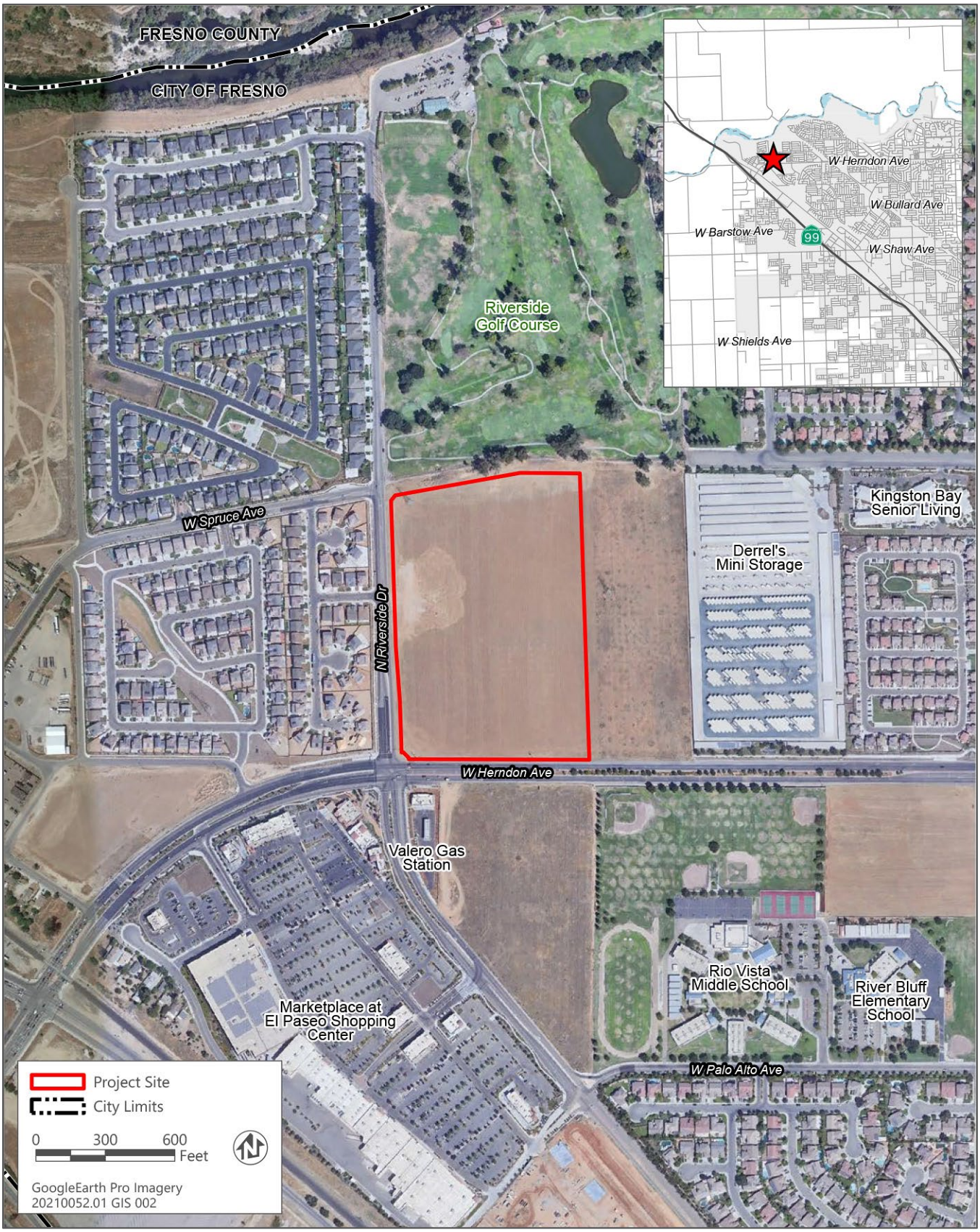
Responsible, trustee, and interested agencies may include:

- State Water Resource Control Board,
- Central Valley Regional Water Quality Control Board,
- San Joaquin Valley Air Pollution Control District, and
- Fresno Metropolitan Flood Control District.

## 1.2 SUMMARY DESCRIPTION OF THE PROJECT

### 1.2.1 Project Location

The project site is a 22.4-acre parcel located at the northeast corner of the intersection of West Herndon Avenue and North Riverside Drive in the city of Fresno. The project site is bordered by the unbuilt right-of way of West Spruce Avenue to the north, the right-of-way of (currently unbuilt) North Arthur Avenue to the east, West Herndon Avenue to the south, and North Riverside Drive to the east (Figure 1-1).




Source: Adapted by Ascent Environmental in 2021.

**Figure 1-1 Project Location**

## 1.2.2 Project Objectives

The State CEQA Guidelines require that an EIR include a statement of objectives for the project and that the objectives include the underlying purpose of the project. The following is a list of project objectives:

- Construct and operate a new membership-only Costco Commercial Center northwest Fresno that serves the local community with a wide variety of goods and services from both nationally known businesses and regional and local businesses.
- Locate the new membership-only Costco Commercial Center in a location that is convenient for its members, the community, and employees to travel to for shopping and working.
- Locate the new membership-only Costco Commercial Center in an area serviced by adequate existing infrastructure, including roadways and utilities.
- Establish a facility of sufficient size to provide a state-of-the-art facility that integrates several services, including home and/or business delivery service, under one roof.
- Meet demand for automobile services, including gasoline, car wash, and tire center.
- Create a commercial use with architecture designed to facilitate integration with the overall design context for an area, including the surrounding community.
- Reduce energy consumption by incorporating sustainable design features and systems with enhanced energy efficiencies meeting State and federal requirements.
- Continue and increase big-box retail store sales tax revenues received by the City.
- Improve availability of integrated retail sales of goods and services in the northwest area of Fresno.
- Minimize circulation conflicts between automobiles and pedestrians for retail stores and gas stations.

## 1.2.3 Characteristics of the Project

### COSTCO WAREHOUSE BUILDING

The proposed Costco building would occupy 219,126 square feet, of which approximately 24,000 square feet would be reserved for storage and receiving. The sales floor area would include a tire center, optical exams and optical sales, hearing aid testing and sales, pharmacy, food service preparation and sales, meat preparation and sales, bakery and sales of baked goods, and alcohol sales. In addition to the general sales floor, the southwest portion of the warehouse would contain an area for receiving, storing, and loading big and bulky items for Costco's home delivery program.

### COSTCO GAS STATION

The project would include a Costco members-only gas station on the northern portion of the project site adjacent to West Spruce Avenue. The facility would include an approximately 13,000 square-foot canopy and a 125 square-foot controller enclosure. There would be four covered fueling islands, each with four two-sided fuel dispensers to provide for the fueling of eight cars at each island, for a total of 32 fueling positions. The gas station would also have eight stacking lanes, allowing approximately 40 cars to wait for pumps at any given time in addition to the 32 cars at the dispensers. The dispensers would be fully automated and self-service. Four underground fuel tanks would also be installed at the southern edge of the gas station. Lights would be recessed into the canopy to provide both lighting during operating hours and a lower level of security lighting after hours.

## COSTCO CAR WASH

A Costco members-only automated carwash would be located at the northwest corner of the project site, adjacent to the gas station. The car wash facility would include only the automated car wash within the structure. Wash water would be recycled. No self-service car vacuum stations would be provided.

## PEDESTRIAN TRAILS AND BIKE PATHS

The project would include construction of 12-foot-wide pedestrian and bicycle paths along the project's frontage with West Herndon Avenue and North Riverside Drive. These facilities would be consistent with the City's Active Transportation Plan.

## OFF-SITE ROADWAY IMPROVEMENTS

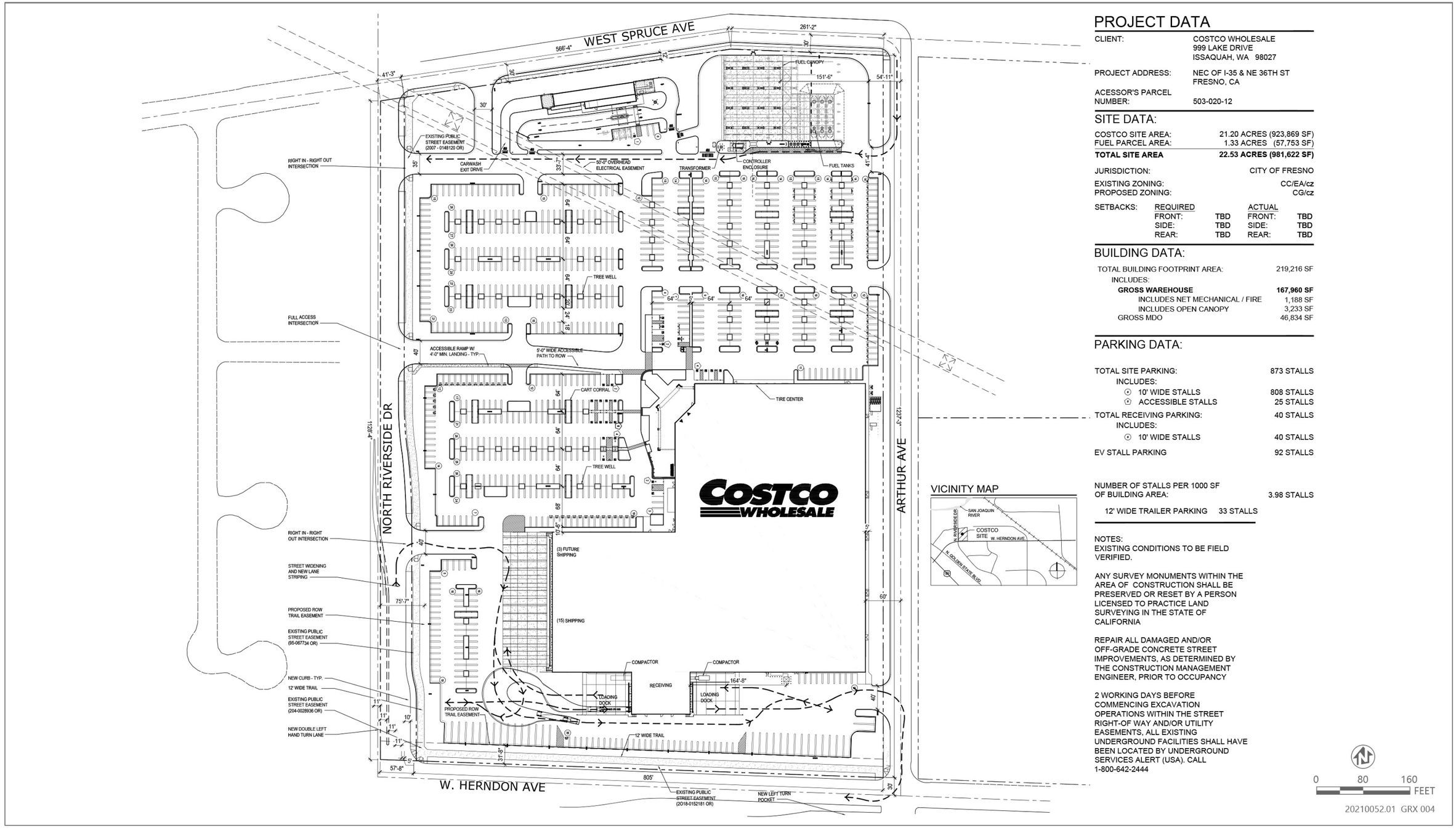
The project would include adjustments to the configuration of the southbound turn lanes on North Riverside Drive and North Golden State Boulevard to accommodate additional vehicle traffic turning onto West Herndon Avenue. The project would also include the construction of North Arthur Avenue along the eastern edge of the project site and the construction of West Spruce Avenue from North Riverside Drive to the intersection with North Sandrini Avenue.

## PROPOSED DESIGN REFINEMENTS

Since publication of the Draft EIR, the applicant has proposed several minor refinements to the project design. Overall, the changes result in a reduced building footprint for the warehouse retail and car wash components of the project, as described in further detail below. The revised site plan is provided as Figure 1-2.

- **Reduced Warehouse Size:** The size of the warehouse would be reduced by 22,216 square feet by adjusting the northern wall of the warehouse structure approximately 54 feet south of the plan lines shown in Figure 2-8 of the Draft EIR. As revised, the total warehouse retail building footprint would be 219,126 square feet.
- **Design of Warehouse Entry:** The entry canopy at the northwestern corner of the building would be designed with a 45-degree angle, rather than a 90-degree angle as depicted in previous plans.
- **Shorter Car Wash Tunnel:** The layout of the car wash building would also be refined, including a reduction of the proposed tunnel length, from 170 feet to 140 feet.
- **Parking Lot Design Changes:** Finally, the curb cuts on North Arthur Avenue would be revised to reduce potential for cut-through traffic between North Arthur Avenue and North Riverside Avenue in front of the warehouse entrance. As a result of these changes, the number of parking stalls would increase from 869 to 873.

The proposed changes to the project design do not affect the analysis or conclusions in the Draft EIR and the potential environmental effects of the project are unaffected.




## PROJECT DATA

| | |
|---|---|
| CLIENT: | COSTCO WHOLESALE<br>999 LAKE DRIVE<br>ISSAQUAH, WA 98027 |
| PROJECT ADDRESS: | NEC OF I-35 & NE 36TH ST<br>FRESNO, CA |
| ACESSOR'S PARCEL NUMBER: | 503-020-12 |

## SITE DATA:

| | |
|---|---|
| COSTCO SITE AREA: | 21.20 ACRES (923,869 SF) |
| FUEL PARCEL AREA: | 1.33 ACRES (57,753 SF) |
| **TOTAL SITE AREA** | **22.53 ACRES (981,622 SF)** |
| JURISDICTION: | CITY OF FRESNO |
| EXISTING ZONING: | CC/EA/cz |
| PROPOSED ZONING: | CG/cz |

| SETBACKS: | REQUIRED | | ACTUAL | |
|---|---|---|---|---|
| | FRONT: | TBD | FRONT: | TBD |
| | SIDE: | TBD | SIDE: | TBD |
| | REAR: | TBD | REAR: | TBD |

## BUILDING DATA:

| | |
|---|---|
| TOTAL BUILDING FOOTPRINT AREA: | 219,216 SF |
| INCLUDES: | |
| **GROSS WAREHOUSE** | **167,960 SF** |
| INCLUDES NET MECHANICAL / FIRE | 1,188 SF |
| INCLUDES OPEN CANOPY | 3,233 SF |
| GROSS MDO | 46,834 SF |

## PARKING DATA:

| | |
|---|---|
| TOTAL SITE PARKING: | 873 STALLS |
| INCLUDES: | |
| 10' WIDE STALLS | 808 STALLS |
| ACCESSIBLE STALLS | 25 STALLS |
| TOTAL RECEIVING PARKING: | 40 STALLS |
| INCLUDES: | |
| 10' WIDE STALLS | 40 STALLS |
| EV STALL PARKING | 92 STALLS |
| NUMBER OF STALLS PER 1000 SF OF BUILDING AREA: | 3.98 STALLS |
| 12' WIDE TRAILER PARKING | 33 STALLS |

NOTES:
EXISTING CONDITIONS TO BE FIELD VERIFIED.

ANY SURVEY MONUMENTS WITHIN THE AREA OF CONSTRUCTION SHALL BE PRESERVED OR RESET BY A PERSON LICENSED TO PRACTICE LAND SURVEYING IN THE STATE OF CALIFORNIA

REPAIR ALL DAMAGED AND/OR OFF-GRADE CONCRETE STREET IMPROVEMENTS, AS DETERMINED BY THE CONSTRUCTION MANAGEMENT ENGINEER, PRIOR TO OCCUPANCY

2 WORKING DAYS BEFORE COMMENCING EXCAVATION OPERATIONS WITHIN THE STREET RIGHT-OF WAY AND/OR UTILITY EASEMENTS, ALL EXISTING UNDERGROUND FACILITIES SHALL HAVE BEEN LOCATED BY UNDERGROUND SERVICES ALERT (USA). CALL 1-800-642-2444

Source: Adapted by Ascent Environmental in 2021.

**Figure 1-2 Revised Site Plan**

## 1.3 MAJOR CONCLUSIONS OF THE ENVIRONMENTAL ANALYSIS

The Draft EIR identified the following significant impacts related to the project:

- Impact 3.11-1: Generation of a substantial temporary increase of construction noise levels in excess of applicable standards
- Impact 3.13-2: Conflict or Be Inconsistent with CEQA Guidelines Section 15064.3, Subdivision (b) Regarding Vehicle Miles Traveled
- Impact 3.13-3: Substantially Increase Hazards Due to a Geometric Design Feature (e.g., Sharp Curves or Dangerous Intersections) or Incompatible Uses (e.g., Farm Equipment)
- Impact 4-13: Cumulative Transportation Impacts

## 1.4 CEQA PUBLIC REVIEW PROCESS

On July 11, 2023, the City released the Draft EIR for public review and comment. The Draft EIR was submitted to the State Clearinghouse for distribution to reviewing agencies; posted on the City's website (https://www.fresno.gov/planning/plans-projects-under-review/#tab-14); and was made available at the Planning and Development Department (2600 Fresno Street, Room 3043). The document was also available for review at the Teague Branch Library (4718 N Polk Avenue). A notice of availability of the Draft EIR was published in the Fresno Bee.

As a result of these notification efforts, written and verbal comments were received from two state agencies (California Department of Fish and Wildlife and California Department of Transportation) and one local agency (San Joaquin Valley Air Pollution Control District), an organization representing the project applicant, and individuals. Chapter 2, "Responses to Comments," identifies these commenting parties, their respective comments, and provides responses to these comments. None of the comments received, or the responses provided, constitute "significant new information" by CEQA standards (State CEQA Guidelines CCR Section 15088.5).

## 1.5 ORGANIZATION OF THE FINAL EIR

This Final EIR is organized as follows:

**Chapter 1, "Introduction,"** describes the purpose of the Final EIR, summarizes the Costco Commercial Center project and the major conclusions of the Draft EIR, provides an overview of the CEQA public review process, and describes the content of the Final EIR.

**Chapter 2, "Responses to Comments,"** contains a list of all parties who submitted comments on the Draft EIR during the public review period, copies of the comment letters received, and responses to the comments.

**Chapter 3, "Revisions to the Draft EIR,"** presents revisions to the Draft EIR text made in response to comments, or to amplify, clarify or make minor modifications or corrections. Changes in the text are signified by ~~strikeouts~~ where text is removed and by <u>underline</u> where text is added.

**Chapter 4, "References,"** identifies the documents used as sources for the analysis.

**Chapter 5, "List of Preparers,"** identifies the lead agency contacts as well as the preparers of this Final EIR.

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# 2 RESPONSES TO COMMENTS

This chapter contains comment letters received during the public review period for the Draft EIR, which concluded on August 28, 2023. In conformance with Section 15088(a) of the State CEQA Guidelines, written responses were prepared addressing comments on environmental issues received from reviewers of the Draft EIR.

## 2.1 LIST OF COMMENTERS ON THE DRAFT EIR

Table 2-1 presents the list of commenters, including the numerical designation for each comment letter received, the author of the comment letter, and the date of the comment letter.

**Table 2-1 List of Commenters**

| Letter No. | Commenter | Date |
|---|---|---|
| | AGENCIES | |
| A1 | California Department of Fish and Wildlife | August 14, 2023 |
| A2 | California Department of Transportation | August 15, 2023 |
| A3 | San Joaquin Valley Air Pollution Control District | August 23, 2023 |
| | ORGANIZATIONS | |
| O1 | Burke, Williams & Sorensen, LLP, on behalf of Costco Wholesale | August 28, 2023[1] |
| | INDIVIDUALS | |
| I1 | Matthew Schellenberg | July 21, 2023 |
| I2 | Teresa Sanchez | July 21, 2023 |
| I3 | Dolores Davidian | July 19, 2023 |
| I4 | Vernon Valmonte | July 18, 2023 |
| I5 | Denise King | July 17, 2023 |
| I6 | Sharon Ross | July 17, 2023 |
| I7 | Susan Hansen | July 17, 2023 |
| I8 | Claudia Readwright | July 17, 2023 |
| I9 | Shahzaib Zaman | July 17, 2023 |
| I10 | Tj Atwal | July 17, 2023 |
| I11 | Rey Alvarez | July 17, 2023 |
| I12 | Agnes Habellion | July 16, 2023 |
| I13 | Linnea and David Faeth | July 16, 2023 |
| I14 | Alana L. Lewis | July 16, 2023 |
| I15 | Sharon Henson | July 16, 2023 |
| I16 | Jeannette Correa | July 16, 2023 |
| I17 | Dantenello Velasquez | July 15, 2023 |
| I18 | Randy Ames | July 15, 2023 |
| I19 | Kiersten Winrow | July 14, 2023 |
| I20 | Joseph Pulido | July 14, 2023 |
| I21 | Jeremy Bruno | July 14, 2023 |
| I22 | Bob Eurich | July 14, 2023 |
| I23 | Sukhi Dhillon | July 14, 2023 |
| I24 | Sakit Bibra | July 14, 2023 |

| Letter No. | Commenter | Date |
|---|---|---|
| I25 | Anya Ellis | July 14, 2023 |
| I26 | Michael and Joan Paine | July 14, 2023 |
| I27 | Bekah Bryant | July 14, 2023 |
| I28 | Randy Mills | July 13, 2023 |
| I29 | William and Melody Hardaway | July 13, 2023 |
| I30 | Geoff J. | July 13, 2023 |
| I31 | Birdevinder | July 13, 2023 |
| I32 | Bryan Miller | July 13, 2023 |
| I33 | Colton Metzler | July 13, 2023 |
| I34 | Ty Murphy | July 13, 2023 |
| I35 | Jax Ward | July 13, 2023 |
| I36 | Elizabeth Mendoza | July 13, 2023 |
| I37 | J. Chmielewski | July 13, 2023 |
| I38 | Kent Yamaguchi | July 13, 2023 |
| I39 | Nick Quisenberry | July 13, 2023 |
| I40 | Don Marshall | July 13, 2023 |
| I41 | Jerry Montejano | July 13, 2023 |
| I42 | William Duane Peverill | July 21, 2023 |
| I43 | Lorraine Arrington | July 21, 2023 |
| I44 | Dr. Danielle Biggs | July 21, 2023 |
| I45 | Holden Markwith | July 21, 2023 |
| I46 | David Scott | July 22, 2023 |
| I47 | Amy Siliznoff | July 22, 2023 |
| I48 | Betty Williams | July 22, 2023 |
| I49 | Jensen Vang | July 22, 2023 |
| I50 | Melody Wolverton | July 22, 2023 |
| I51 | Joseph Pulido | July 22, 2023 |
| I52 | John Olszowka | July 23, 2023 |
| I53 | Justin Latham | July 23, 2023 |
| I54 | Charles Ognibene | July 23, 2023 |
| I55 | Jamey Schmidt | July 24, 203 |
| I56 | William Duane Peverill | July 24, 2023 |
| I57 | Lorraine Arrington | July 24, 2023 |
| I58 | Pat Yaralian | July 25, 2023 |
| I59 | Michael Van | July 25, 2023 |
| I60 | Sabrina Hernandez | July 26, 2023 |
| I61 | Javier Morales | July 27, 2023 |
| I62 | James and Louisa Weyant | July 27, 2023 |
| I63 | Shirley Hutchison | July 27, 2023 |
| I64 | Maria Leon | July 27, 2023 |
| I65 | Norman S. Stahl | July 27, 2023 |
| I66 | Jesus Diaz | July 27, 2023 |
| I67 | Anthony Scheideman | July 27, 2023 |

| Letter No. | Commenter | Date |
|---|---|---|
| I68 | Rick and Kathy Haskill | July 28, 2023 |
| I69 | Kevin Cartwright | July 28, 2023 |
| I70 | Adalino | July 28, 2023 |
| I71 | Juan Duran | July 28, 2023 |
| I72 | Miguel Duran | July 28, 2023 |
| I73 | Fabrizio Robalino | July 31, 2023 |
| I74 | Celso "Sal" Romero, Jr. | July 31, 2023 |
| I75 | Cindy Diaz | August 1, 2023 |
| I76 | Joy Hinrichsen | August 2, 2023 |
| I77 | Garrett Schaefer | August 3, 2023 |
| I78 | Lynda Allison Doty | August 8, 2023 |
| I79 | Tom Basset | August 8, 2023 |
| I80 | Beth Durbin | August 9, 2023 |
| I81 | Sandra J. Iley | August 9, 2023 |
| I82 | Stephanie S. | August 10, 2023 |
| I83 | Thomas Coppin | August 10, 2023 |
| I84 | Dawn Mathews | August 10, 2023 |
| I85 | Larry Rodriguez | August 11, 2023 |
| I86 | Sylvia Fernandez | August 11, 2023 |
| I87 | Jens Andersen | August 13, 2023 |
| I88 | Richee Xavonglianekham | August 14, 2023 |
| I89 | Janet Bergman | August 15, 2023 |
| I90 | Robin Snowden | August 17, 2023 |
| I91 | Shauna Sandin | August 18, 2023 |
| I92 | Charles Yuvienco | August 19, 2023 |
| I93 | Darius Assemi | August 21, 2023 |
| I94 | Noel Delgado | August 21, 2023 |
| I95 | Ray Gonzales | August 24, 2023 |
| I96 | Jennifer Airheart | August 24, 2023 |
| I97 | Amy Zehring | August 25, 2023 |
| I98 | Brian and Sherryl Kellogg | August 24, 2023 |
| I99 | Rodger B. Jensen | August 25, 2023 |
| I100 | James Fleck | August 28, 2023 |
| I101 | Gabriel Ledesma | August 28, 2023 |
| I102 | Lauryn Medina | September 1, 2023[1] |
| I103 | Daniel Brannick | August 31, 2023 [1] |

[1] The comment was received after the close of the public comment period.

## 2.2 COMMENTS AND RESPONSES

The written individual comments received on the Draft EIR and the responses to those comments are provided below. The comment letters are reproduced in their entirety and are followed by the response(s). Where a commenter has provided multiple comments, each comment is indicated by a line bracket and an identifying number in the margin of the comment letter.

# 2.2.1 Agencies

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**STATE OF CALIFORNIA • NATURAL RESOURCES AGENCY**
Gavin Newson, Governor
**DEPARTMENT OF FISH AND WILDLIFE**
Charlton H. Bonham, Director
Central Region
1234 East Shaw Avenue | Fresno, California 93710 | (559)243-4005

Letter A1

August 14, 2023

Jose Valenzuela
Supervising Planner
City of Fresno - Planning and Development Department
2600 Fresno St, Room 3043
Fresno, California 93721

**Subject: Costco Commercial Center Project (Project)**
**Draft Environmental Impact Report (DEIR)**
**State Clearinghouse No. 2021100443**

Dear Jose Valenzuela :

Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the Project that may affect California fish and wildlife. Likewise, the California Department of Fish and Wildlife (CDFW) appreciates the opportunity to provide comments regarding those aspects of the Project that CDFW, by law, may be required to carry out or approve through the exercise of its own regulatory authority under Fish and Game Code. While the comment period may have ended, CDFW would appreciate it if you would still consider our comments. A1-1

After reviewing the provided CEQA document, CDFW concurs with the biological resources related analyses and measures proposed in the DEIR and recommends that all such measures in the DEIR be carried forward into the Final EIR. CDFW has determined that most of the biological resource mitigation measures as currently documented in the DEIR are sufficient for mitigation of potential project related impacts to listed species. Please note that take of any species listed under the California Endangered Species Act (CESA) would be unauthorized if an Incidental Take Permit (ITP) pursuant to Fish and Game Code section 2081 subdivision (b) was not acquired in advance of such actions. It is recommended to consult with CDFW before any ground disturbing activities A1-2

wildlife.ca.gov

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commence and to obtain an ITP if take of CESA listed species cannot be avoided. **A1-2 cont.**

Mitigation Measure 3.5-1b states surveys will be done for Swainson's Hawk, white-tailed kite, and other raptors. CDFW recommends surveys be conducted by a qualified biologist with knowledge of SWHA natural history and behaviors, following the survey methods developed by the Swainson's Hawk Technical Advisory Committee (SWHA TAC 2000). **A1-3**

CDFW appreciates the opportunity to comment on the Project to assist the City of Fresno in identifying and mitigating the Project's impacts on biological resources.

More information on survey and monitoring protocols for sensitive species can be found at CDFW's website (https://www.wildlife.ca.gov/Conservation/Survey-Protocols). If you have any questions, please contact Jaime Marquez, Environmental Scientist, at the address provided on this letterhead, or by electronic mail at Jaime.Marquez@wildlife.ca.gov. **A1-4**

Sincerely,

DocuSigned by:
FA83F09FE08945A...
Julie A. Vance
Regional Manager

ec: State.Clearinghouse
Governor's Office of Planning and Research
State.Clearinghouse@opr.ca.gov

DocuSign Envelope ID: F7DF552B-2048-4132-8347-C51143690D4F



## REFERENCES

Swainson's Hawk Technical Advisory Committee (SWHA TAC). 2000. Recommended Timing and Methodology for Swainson's Hawk Nesting Surveys in California's Central Valley. Swainson's Hawk Technical Advisory Committee.

# Letter A1 California Department of Fish and Wildlife

Julie A. Vance, Regional Manager
August 14, 2023

**Response A1-1**

The comment provides introductory remarks and states that the California Department of Fish and Wildlife (CDFW), by law, may be required to carry out or approve through the exercise of its own regulatory authority under Fish and Game Code. Page 2-21 of the Draft EIR identifies CDFW as a trustee agency that has jurisdiction over resources potentially affected by the project. This comment does not address the adequacy of the Draft EIR analysis; therefore, no revisions to the Draft EIR are necessary in response to this comment.

**Response A1-2**

The comment states that CDFW concurs with the analysis related to biological resources and determined that the mitigation measures identified in the Draft EIR are sufficient to mitigate impacts to listed species. In addition, the comment states that consultation with CDFW is recommended and an incidental take permit (ITP) would be required if take of listed species cannot be avoided. Mitigation Measure 3.5-1b, described on pages 3.5-15 and 3.5-16 of the Draft EIR, requires the project proponent to retain a qualified biologist to implement avoidance buffers around active nest sites of listed or fully protected species (e.g., Swainson's hawk and white-tailed kite) in consultation with CDFW and conduct periodic monitoring of these sites during project construction. Implementation of Mitigation Measure 3.5-1b would avoid incidental take of Swainson's hawk, white-tailed kite, and other nesting raptors; therefore, it is not anticipated that an ITP would be needed for the project. No revisions to the Draft EIR are necessary in response to this comment.

**Response A1-3**

The comment recommends that surveys for Swainson's Hawk, white-tailed kite, and other raptors be conducted by a qualified biologist with knowledge of Swainson's hawk natural history and behaviors and following the survey methods developed by the Swainson's Hawk Technical Advisory Committee. Mitigation Measure 3.5-1b, described on pages 3.5-15 and 3.5-16 of the Draft EIR, states that nesting bird surveys will be conducted by a qualified biologist familiar with birds of California and with experience conducting nesting bird surveys. The qualified biologist would be required to follow survey protocols promulgated by CDFW. Therefore, no revisions to the Draft EIR are necessary in response to this comment.

**Response A1-4**

The comment provides closing remarks, resources with additional information, and the CDFW contact for coordination in connection with the project. This comment is not related to the adequacy of the CEQA document. No further response is required.

CALIFORNIA STATE TRANSPORTATION AGENCY GAVIN NEWSOM, GO

**California Department of Transportation**

Letter A2

DISTRICT 6 OFFICE
1352 WEST OLIVE AVENUE | P.O. BOX 12616 | FRESNO, CA 93778-2616
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August 15, 2023

FRE-99-30.458
Costco Commercial Warehouse- N. Riverside Dr.
SCH #2021100443
GTS #: https://ld-igr-gts.dot.ca.gov/district/6/report/30405

***SENT VIA EMAIL***

Jose Valenzuela
Supervising Planner
City of Fresno – Planning and Development Department
2600 Fresno Street, Room 3043
Fresno, CA 93721
Jose.Valenzuela@fresno.gov

Dear Mr. Valenzuela:

Caltrans has completed a review of Draft Environmental Impact Report consisting of a Transportation Impact Analysis (TIA) on a proposed Costco Wholesale Commercial Center located on the northeast corner of Herndon Avenue and North Riverside Drive within the City of Fresno (City). The retail facility will include an attached tire center, detached gas station, market delivery operation center, and drive-through car wash.

The proposed commercial facility will be set on a single parcel of approximately 22.40 acres (APN 503-020-12) and contain approximately 191,346 square feet of building space. The project site is located at the northeast corner of N. Riverside Drive and W. Herndon Avenue in the City of Fresno, CA.

The mission of Caltrans is to provide a safe and reliable transportation network that serves all people and respects the environment. The Local Development Review (LDR) process reviews land use projects and plans through the lenses of our mission and state planning priorities of infill, conservation, and travel-efficient development. To ensure a safe and efficient transportation system, we encourage early consultation and coordination with local jurisdictions and project proponents on all development projects that utilize the multimodal transportation network.

Caltrans provides the following comments consistent with the State's smart mobility goals that support a vibrant economy and sustainable communities:

A2-1

"Provide a safe and reliable transportation network that serves all people and respects the environment"

1. Based on the findings of the TIA, the project-generated trips are not expected to have a significant safety impact to the nearby state facilities. A queue length analysis was performed on the SR 99 & Herndon Avenue northbound off-ramp and adjacent intersection of Parkway Drive and Herndon Avenue. The results of the analysis indicated that the existing storage length of the off-ramps and turn lanes are adequate. The anticipated vehicle queue along the off-ramps during the peak hours is not anticipated to extend onto the SR 99 mainline. A2-2

2. Within the study area, a Caltrans project is being constructed for a new interchange along SR 99 at Veterans Boulevard. Per the analysis, future traffic conditions at the SR 99 & Herndon Avenue offramp and adjacent Parkway Drive & Herndon Avenue intersection are anticipated to improve upon completion of the Veterans Boulevard interchange. The planned future interchange is projected to result in lower traffic volumes within the immediate project vicinity. A2-3

3. To ensure the continued operational capacity and safety of the interchange and its surrounding local roadways, the project developer is recommended to contribute to the local impact fee program. This would provide the local municipality with funding for infrastructure improvements necessary to complement future SR 99 facility safety improvements needed due to area growth and development. A2-4

4. The existing Costco (Shaw) is estimated to produce 120,083 total daily VMT. The total daily VMT anticipated for the relocated Herndon Costco site is 191,032 miles. The proposed project estimates an increase of 129,326+ miles/day net change in vehicle miles traveled.

5. Based on the TIA, the impact the project will have on VMT in the surrounding project area will be significant and cannot be avoided. Proposed mitigation measures to help reduce approximately 13,385 project produced VMTs rest solely on employee participation in Costco's commute trip reduction program. A2-5

6. Alternative transportation policies should be applied to the development. An assessment of multi-modal facilities should be conducted to develop an integrated multi-modal transportation system to serve and help alleviate traffic congestion caused by the project and related development in this area of the City. The assessment should include the following:

6

   a. Pedestrian walkways should link this Project to transit facilities, bicycle pathways, and other walkways in the surrounding area.

   b. Coordinating connections to local and regional bicycle pathways should be done to encourage further the use of bicycles for commuter and recreational purposes. A2-6

"Provide a safe and reliable transportation network that serves all people and respects the environment"

c. Transit service and bus stop accommodations should be extended to within ¼-mile of the Project site. A2-6 cont.

7. According to the City of Fresno Active Transportation Plan (ATP) 2016, Herndon Avenue, along the Project's southern boundary, is planned to include a Class I bike path, and Riverside Avenue, along the Project's western boundary, is planned to include either a Class I bike path or a Class II bike lane (see page 120). Therefore, it is recommended that the Project follow the City's ATP 2016 plan and install the Class I bike path along Herndon Avenue and the Class I bike path/Class II bike lane along Riverside Avenue. A2-7

8. The project might also consider coordinating connections to regional bicycle pathways to encourage the use of bicycles for commuter and recreational purposes. A2-8

9. Caltrans recommends the Project implement multimodal strategies, such as those that originate from Transit-oriented development (TOD), in an effort to reduce the Project's traffic-related impacts. A2-9

10. Caltrans **recommends** that the Project implement "smart growth" principles regarding parking solutions, providing alternative transportation choices to residents and employees. Alternative transportation choices may include but are not limited to parking for carpools/vanpools, car-share, and/or ride-share programs. A2-10

11. Based on Caltrans Vehicle Miles Traveled (VMT)-Focused Transportation Impact Study Guide, dated May 20, 2020, and effective as of July 1, 2020, Caltrans seeks to reduce single occupancy vehicle trips, provide a safe transportation system, reduce per capita VMT, increase accessibility to destinations via cycling, walking, carpooling, transit and reduce greenhouse gas (GHG) emissions. Caltrans recommends that the project proponent continue to work with the City to implement further improvements to reduce VMT and offer a variety of transportation modes for its employees. A2-11

12. Caltrans recommends assigning some of the parking stalls to electric vehicle parking only. Providing electric vehicle charging stations and parking promotes more sustainable alternatives as part of the statewide efforts to reduce greenhouse gas emissions. A2-12

13. The City should consider requiring the project to provide charging stations *for freight trucking* as part of the statewide efforts to reduce greenhouse gas emissions, reduce freight parking shortages and maintain the Federal Hours of Service regulations. A2-13

14. The City should consider requiring the project to implement on-site parking for A2-14

freight trucks within the project boundaries, which truck drivers can utilize for extending parking periods before loading or after unloading. A2-14 cont.

15. Caltrans recommends the project pay into the City Traffic Impact Fee program for on-going development in the vicinity. A2-15

16. Active Transportation Plans (ATP) and Smart Growth efforts support the State's 2050 Climate goals. Caltrans supports reducing Vehicle Miles Traveled (VMT) and GHG emissions in ways that increase the likelihood people will benefit from a multimodal transportation network. A2-16

If you have any other questions, please call or email: Keyomi Jones, Transportation Planner at (559) 981-7284 or keyomi.jones@dot.ca.gov. A2-17

Sincerely,

Mr. Dave Padilla, Branch Chief,
Transportation Planning – North

"Provide a safe and reliable transportation network that serves all people and respects the environment"

# Letter A2 California Department of Transportation

Dave Padilla, Branch Chief
August 15, 2023

Response A2-1
The comment provides introductory remarks, a summary of the proposed project, and a description of the California Department of Transportation's (Caltrans') mission and review process. The comment is not related to the adequacy of the CEQA document. No further response is required.

Response A2-2
The comment summarizes the findings of the transportation impact analysis (TIA), stating that the project would not have a significant safety impact on state facilities and that there is adequate length on existing facilities for project-related queuing. The comment does not offer any specific concern related to the adequacy of the TIA or Draft EIR; therefore, no revisions to the Draft EIR are necessary in response to this comment.

Response A2-3
The comment identifies a new interchange that is being constructed along State Route 99 at Veterans Boulevard, which is projected to reduce traffic volumes in the project vicinity. This comment does not address the adequacy of the Draft EIR analysis; therefore, no further response is required. The comment is included in the record, which will be considered by the decision makers in their deliberations over potential approval of the proposed project.

Response A2-4
The comment recommends that the project proponent contribute to a local impact fee program to fund future infrastructure improvements "necessary to complement future SR 99 facility safety improvements" being completed by Caltrans (see Comment A2-3). The City of Fresno's citywide development impact fees include funds for transportation projects. This comment does not address the adequacy of the Draft EIR analysis; therefore, no further response is required.

Response A2-5
The comment identifies the net increase in vehicle miles traveled (VMT) that would result from the project and restates the conclusion from the TIA and Draft EIR that the project will have a significant and unavoidable impact related to VMT. This comment does not offer any specific concern related to the adequacy of the TIA or Draft EIR; therefore, no revisions to the Draft EIR are necessary in response to this comment.

Response A2-6
The comment recommends that alternative transportation policies be applied to the project and an assessment of multi-modal facilities be conducted to identify improvements to alleviate traffic congestion caused by the project. As described below in Response A2-7, the project would include construction of the elements of the City of Fresno Active Transportation Plan that are planned adjacent to the project site and all applicable alternative transportation policies would be applied to the project.

For a full discussion of the project's consistency with programs, plans, and ordinances related to transit, bicycle, and pedestrian facilities, refer to Impact 3.13-1 in Section 3.13, "Transportation and Circulation," of the Draft EIR. As summarized on page 3.13-12:

> The nature of bulk shopping and auto-oriented services at the Costco facility does not lend itself to substantially increased transit ridership. Additionally, the proposed project would not conflict with any existing transit stops. Furthermore, off-site bicycle and pedestrian improvements could enhance first/last mile connections for transit riders using the bus stops in the vicinity of the proposed project. The proposed project would provide short-term bicycle parking as required by the City Municipal Code (Article 24, Section 15-2429). Consistent with the City of Fresno's ATP, the proposed project involves the construction of off-site Class I bicycle facilities along the proposed project frontage on West Herndon Avenue and North Riverside Drive and Class II bicycle facilities along newly constructed Spruce Avenue.

This comment does not raise issues related to the adequacy of the Draft EIR analysis; therefore, no further response is required. The comment is included in the record, which will be considered by the decision makers in their deliberations over potential approval of the proposed project.

Response A2-7

The comment recommends that the project installs the bike paths along Herndon Avenue and Riverside Avenue as identified in the City of Fresno Active Transportation Plan 2016. As indicated in Chapter 2, "Project Description," of the Draft EIR, the project would include construction of these facilities. This comment does not address the adequacy of the Draft EIR analysis; therefore, no further response is required. The comment is included in the record, which will be considered by the decision makers in their deliberations over potential approval of the proposed project.

Response A2-8

The comment recommends that the project coordinate connections to regional pathways. As indicated above in Responses A2-6 and A2-7, the project would provide connections to regional bikeways. This comment does not address the adequacy of the Draft EIR analysis; therefore, no further response is required. The comment is included in the record, which will be considered by the decision makers in their deliberations over potential approval of the proposed project.

Response A2-9

The comment recommends that the project implement multimodal strategies such as those associated with transit-oriented development, to reduce traffic-related impacts. The comment does not specify any potential strategies. Transit-oriented development strategies are typically integrated at the plan or community scale and are not applicable to individual commercial projects. Further, as explained in the Draft EIR (see page 3.13-18), the nature of the proposed Costco as a bulk good seller further limits the applicability and effectiveness of transit as a proposed mode of transportation to reduce traffic and VMT because the primary source of daily VMT is warehouse shopping by Costco members and the nature of Costco's land use and business model is auto oriented. Members purchase items in bulk at Costco facilities, making walking, biking, or transit trips to the warehouse impractical. This comment does not address the adequacy of the Draft EIR analysis; therefore, no further response is required. The comment is included in the record, which will be considered by the decision makers in their deliberations over potential approval of the proposed project.

Response A2-10

The comment recommends that the project "implement 'smart growth' principles regarding parking solutions, providing alternative transportation choices to residents and employees." As examples of such programs, the comment identified "parking for carpools/vanpools, car-share, and/or ride-share programs." The project does not include a residential component, and no residential parking is planned.

Through application of Mitigation Measure 3.13-2, the project applicant would be required to develop a commute reduction program for employees. Specific actions that may be incorporated into this program include designating a certain percentage of desirable parking spaces for ridesharing vehicles. The comment is included in the record, which will be considered by the decision makers in their deliberations over potential approval of the proposed project.

Response A2-11

The comment recommends that the project proponent continue to work with the City to implement further improvements to reduce VMT and offer alternate transportation modes for employees. Through application of Mitigation Measure 3.13-2, the project applicant would implement a commute reduction program for employees. Refer to Impact 3.13-2 (Draft EIR pages 3.13-13 through 3.13-18) for further information. The comment is included in the record, which will be considered by the decision makers in their deliberations over potential approval of the proposed project.

Response A2-12
The comment recommends that the project provide electric vehicle parking. As stated on page 2-14 of the Draft EIR, the project includes 53 electric vehicle-ready parking stalls. Therefore, no revisions to the Draft EIR are necessary in response to this comment.

Response A2-13
The comment states that the City should consider requiring the project proponent to provide charging stations for freight trucking to reduce greenhouse gas (GHG) emissions, reduce freight parking shortages, and maintain the Federal Hours of Service regulations. As described on pages 3.7-11 through 3.7-13 of the Draft EIR, the project would not generate GHG emissions in a manner that would have a significant impact on the environment or that would conflict with the applicable GHG reduction plan adopted by the City or result in significant and unavoidable air quality impacts. Therefore, mitigation requiring the provision of charging stations for freight trucking is not warranted and no revisions to the Draft EIR are necessary in response to this comment.

Response A2-14
The comment states that the City should consider requiring the project proponent to provide on-site parking for freight trucks. The operation of the project would involve both smaller box trucks associated with the market delivery operations (MDO) delivery program and semi-trucks that deliver goods to the warehouse. Approximately 17 to 20 box trucks would regularly park on-site and there are approximately 30 parking spots along Herndon Avenue that are sized for these vehicles. Semi-trucks would not park on-site. Costco's standard operating procedure is to load and unload trucks as soon as they arrive onsite; therefore, no additional on-site truck parking would be necessary for semi-trucks. This suggestion is unrelated to the analysis and conclusions in the Draft EIR. However, it is noted for the record and will be provided to decision makers for consideration.

Response A2-15
The comment recommends that the project proponent contribute to the City's Traffic Impact Fee program. This comment is similar to Comment A2-4. Please refer to Response A2-4 above.

Response A2-16
The comment expresses Caltrans' support for reducing VMT and GHG emissions in a manner that increases the likelihood that people will benefit from a multimodal transportation network. No comment on the analysis or conclusions in the Draft EIR is provided and no further response is required.

Response A2-17
The comment provides the Caltrans contact for coordination in connection with the project. This comment is not related to the adequacy of the CEQA document. No further response is required.

San Joaquin Valley
AIR POLLUTION CONTROL DISTRICT

HEALTHY AIR L

Letter
A3

August 23, 2023

Jose Valenzuela
City of Fresno
Planning and Development Department
2600 Fresno Street, 3rd Floor
Fresno, CA 93721

**Project: Draft Environmental Impact Report for Fresno Costco Commercial Center Project**

**District CEQA Reference No: 20230629**

Dear Mr. Valenzuela:

The San Joaquin Valley Air Pollution Control District (District) has reviewed the Draft Environmental Impact Report (DEIR) from the City of Fresno (City) for the above-mentioned project. Per the DEIR, the project consists of a 241,342 square foot Costco Warehouse Building, 12,885 square foot (32 fueling positions stations) fuel canopy, and a 4,800 square foot drive through car wash (Project). The Project is located at 7120 North Riverside Drive in Fresno, CA. A3-1

The District offers the following comments regarding the Project:

**1) Project Related Emissions**

**1a) Construction Emissions**

The District recommends, to further reduce impacts from construction-related diesel exhaust emissions, the Project should utilize the cleanest available off-road construction equipment, including the latest tier equipment (e.g. tier 4, when available). A3-2

**Samir Sheikh**
Executive Director/Air Pollution Control Officer

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Printed on recycled paper.

**2) Health Risk Screening/Assessment**

The DEIR, specifically Table 3.3-7 (*Health Risk Assessment Results)* on page 3.3-23*,* identifies the Project cancer risk for construction as 1.3 in a million, operation as 5.1 in a million, and the total health risk as 6.4 in a million for maximally exposed residents. However, based on District's review of Appendix C: Air Quality Technical Report, Appendix F: HARP2 Outputs and the health risk modeling files, the District identified multiple residential receptors with maximum cumulative cancer risk resulting in an exceedance of the District's 20 in a million cancer risk significance threshold. As such, District recommends the City revise the DEIR for consistency to ensure adequacy of the Project's air quality impacts on sensitive receptors. A3-3

The District strongly recommends that development projects resulting in a potential significant health risk not be approved by the City.

**3) Industrial/Warehouse Emission Reduction Strategies**

Since the Project consists of a Costco warehouse with a gas service station and is expected to generate Heavy-Heavy Duty (HHD) truck trips, the District recommends the City consider the feasibility of incorporating emission reduction strategies that can reduce potential harmful health impacts, such as those listed below: A3-4

- Require cleanest available heavy-duty trucks and off-road equipment (see comment 5)
- Require HHD truck routing patterns that limit exposure of residential communities and sensitive receptors to emissions (see comment 4)
- Require the minimization of heavy-duty truck idling (see comment 6)
- Ensure solid screen buffering trees, solid decorative walls, and/or other natural ground landscaping techniques are implemented along the property line of adjacent sensitive receptors (see comment 7)
- Require truck entries be located on streets of a higher commercial classification
- Ensure power sources at loading docks for all refrigerated trucks have "plugin" capacity, which will eliminate prolonged idling while loading and unloading goods
- Incorporate bicycle racks and electric bike plug-ins
- Require the use of low volatile organic compounds (VOC) architectural and industrial maintenance coatings
- Designate an area during construction to charge electric powered construction vehicles and equipment, if temporary power is available
- Prohibit the use of non-emergency diesel-powered generators during construction

- Inform the project proponent of the incentive programs (e.g., Carl Moyer Program and Voucher Incentive Program) offered to reduce air emissions from the Project
- Ensure all landscaping be drought tolerant

A3-4 cont.

**4) Truck Routing**

Truck routing involves the assessment of which roads HHD trucks take to and from their destination, and the emissions impact that the HHD trucks may have on residential communities and sensitive receptors. Since the Project consists of a Costco warehouse, the Project is expected to generate HHD truck trips.

The District recommends the City evaluate HHD truck routing patterns for the Project, with the aim of limiting exposure of residential communities and sensitive receptors to emissions. This evaluation would consider the current truck routes, the quantity and type of each truck (e.g., Medium Heavy-Duty, HHD, etc.), the destination and origin of each trip, traffic volume correlation with the time of day or the day of the week, overall Vehicle Miles Traveled (VMT), and associated exhaust emissions. The truck routing evaluation would also identify alternative truck routes and their impacts on VMT and air quality.

A3-5

**5) Cleanest Available Heavy-Duty Trucks**

The San Joaquin Valley will not be able to attain stringent health-based federal air quality standards without significant reductions in emissions from HHD trucks, the single largest source of NOx emissions in the San Joaquin Valley. Accordingly, to meet federal air quality attainment standards, the District's ozone and particulate matter attainment plans rely on a significant and rapid transition of HHD fleets to zero or near-zero emissions technologies.

Per the DEIR, the Project is expected to generate HHD truck trips. The District recommends that the following measures be considered by the City to reduce Project-related operational emissions:

- *Recommended Measure*: Fleets associated with operational activities utilize the cleanest available HHD trucks, including zero and near-zero technologies.

- *Recommended Measure*: All on-site service equipment (cargo handling, yard hostlers, forklifts, pallet jacks, etc.) utilize zero-emissions technologies.

A3-6

**6) Reduce Idling of Heavy-Duty Trucks**

The goal of this strategy is to limit the potential for localized PM2.5 and toxic air contaminant impacts associated with the idling of Heavy-Duty trucks. The diesel exhaust from idling has the potential to impose significant adverse health and environmental impacts.

Since the Project is expected to result in HHD truck trips, the District recommends the DEIR to include measures to ensure compliance of the state anti-idling regulation (13 CCR § 2485 and 13 CCR § 2480) and discuss the importance of limiting the amount of idling, especially near sensitive receptors. In addition, the District recommends the City consider the feasibility of implementing a more stringent 3-minute idling restriction and requiring appropriate signage and enforcement of idling restrictions. A3-7

**7) Vegetative Barriers and Urban Greening**

There are single family residential units located directly adjacent to the Project (west and east). The District recommends the City consider the feasibility of incorporating vegetative barriers and urban greening as a measure to further reduce air pollution exposure on sensitive receptors (e.g., residential units).

While various emission control techniques and programs exist to reduce air quality emissions from mobile and stationary sources, vegetative barriers have been shown to be an additional measure to potentially reduce a population's exposure to air pollution through the interception of airborne particles and the update of gaseous pollutants. Examples of vegetative barriers include, but are not limited to the following: trees, bushes, shrubs, or a mix of these. Generally, a higher and thicker vegetative barrier with full coverage will result in greater reductions in downwind pollutant concentrations. In the same manner, urban greening is also a way to help improve air quality and public health in addition to enhancing the overall beautification of a community with drought tolerant, low-maintenance greenery. A3-8

**8) On-Site Solar Deployment**

It is the policy of the State of California that renewable energy resources and zero-carbon resources supply 100% of retail sales of electricity to California end-use customers by December 31, 2045. While various emission control techniques and programs exist to reduce air quality emissions from mobile and stationary sources, the production of solar energy is contributing to improving air quality and public health. The District suggests that the City consider incorporating solar power systems as an emission reduction strategy for the Project. A3-9

**9) Electric Vehicle Chargers**

Per the DEIR, the Project will include electric vehicle charging stations. To support and accelerate the installation of electric vehicle charging equipment and development of required infrastructure, the District offers incentives to public agencies, businesses, and property owners of multi-unit dwellings to install electric charging infrastructure (Level 2 and 3 chargers). The purpose of the District's Charge Up! Incentive program is to promote clean air alternative-fuel technologies and the use of low or zero-emission vehicles. The District recommends that the City and project proponents install electric vehicle chargers at project sites, and at strategic locations.

Please visit www.valleyair.org/grants/chargeup.htm for more information.

A3-10

**10) District's Bikeway Incentive Program**

Per the DEIR, the Project will construct Class I: Bikeway (bike paths) and Class II Bikeway (bike lanes). As such, the Project may be eligible for funding through the District's Bikeway Incentive Program. The Bikeway Incentive Program provides funding for eligible Class 1 (Bicycle Path Construction), Class II (Bicycle Lane Striping), or Class III (Bicycle Route) projects. These incentives are designed to support the construction of new bikeway projects to promote clean air through the development of a widespread, interconnected network of bike paths, lanes, or routes and improving the general safety conditions for commuter bicyclists. Only municipalities, government agencies, or public educational institutions are eligible to apply. More information on the grant program can be found at: http://valleyair.org/grants/bikepaths.htm.

Guidelines and Project Eligibility for the grant program can be found at: http://valleyair.org/grants/documents/bikepaths/2015_Bikeway_Guidelines.pdf

A3-11

**11) District Rules and Regulations**

The District issues permits for many types of air pollution sources, and regulates some activities that do not require permits. A project subject to District rules and regulations would reduce its impacts on air quality through compliance with the District's regulatory framework. In general, a regulation is a collection of individual rules, each of which deals with a specific topic. As an example, Regulation II (Permits) includes District Rule 2010 (Permits Required), Rule 2201 (New and Modified Stationary Source Review), Rule 2520 (Federally Mandated Operating Permits), and several other rules pertaining to District permitting requirements and processes.

A3-12

The list of rules below is neither exhaustive nor exclusive. Current District rules can be found online at: www.valleyair.org/rules/1ruleslist.htm. To identify other District rules or regulations that apply to future projects, or to obtain information about District permit requirements, the project proponents are strongly encouraged to contact the District's Small Business Assistance (SBA) Office at (559) 230-5888.

**11a) District Rules 2010 and 2201 - Air Quality Permitting for Stationary Sources**

Stationary Source emissions include any building, structure, facility, or installation which emits or may emit any affected pollutant directly or as a fugitive emission. District Rule 2010 (Permits Required) requires operators of emission sources to obtain an Authority to Construct (ATC) and Permit to Operate (PTO) from the District. District Rule 2201 (New and Modified Stationary Source Review) requires that new and modified stationary sources of emissions mitigate their emissions using Best Available Control Technology (BACT).

This Project may be subject to District Rule 2010 (Permits Required) and Rule 2201 (New and Modified Stationary Source Review) and may require District permits. Prior to construction, the Project proponent should submit to the District an application for an ATC. For further information or assistance, the project proponent may contact the District's SBA Office at (559) 230-5888.

A3-12 cont.

**11b) District Rule 9510 - Indirect Source Review (ISR)**

The Project is subject to District Rule 9510 because it will receive a project-level discretionary approval from a public agency and will equal or exceed 2,000 square feet of commercial space.

The purpose of District Rule 9510 is to reduce the growth in both NOx and PM emissions associated with development and transportation projects from mobile and area sources; specifically, the emissions associated with the construction and subsequent operation of development projects. The ISR Rule requires developers to mitigate their NOx and PM emissions by incorporating clean air design elements into their projects. Should the proposed development project clean air design elements be insufficient to meet the required emission reductions, developers must pay a fee that ultimately funds incentive projects to achieve off-site emissions reductions.

Per Section 5.0 of the ISR Rule, an Air Impact Assessment (AIA) application is required to be submitted no later than applying for project-level approval from a public agency. The District received an AIA application for this Project (ISR project #20230244).

**11c) District Rule 9410 (Employer Based Trip Reduction)**

The Project may be subject to District Rule 9410 (Employer Based Trip Reduction) if the project would result in employment of 100 or more "eligible" employees. District Rule 9410 requires employers with 100 or more "eligible" employees at a worksite to establish an Employer Trip Reduction Implementation Plan (eTRIP) that encourages employees to reduce single-occupancy vehicle trips, thus reducing pollutant emissions associated with work commutes. Under an eTRIP plan, employers have the flexibility to select the options that work best for their worksites and their employees.

Information about District Rule 9410 can be found online at: www.valleyair.org/tripreduction.htm.

For additional information, you can contact the District by phone at 559-230-6000 or by e-mail at etrip@valleyair.org

**11d) District Rule 4002 (National Emissions Standards for Hazardous Air Pollutants)**

The Project will be subject to District Rule 4002 since the Project will include demolition, renovation, and removal of existing structures. To protect the public from uncontrolled emissions of asbestos, this rule requires a thorough inspection for asbestos to be conducted before any regulated facility is demolished or renovated. Any asbestos present must be handled in accordance with established work practice standards and disposal requirements.

Information on how to comply with District Rule 4002 can be found online at: http://www.valleyair.org/busind/comply/asbestosbultn.htm.

**11e) District Rule 4601 (Architectural Coatings)**

The Project may be subject to District Rule 4601 since it may utilize architectural coatings. Architectural coatings are paints, varnishes, sealers, or stains that are applied to structures, portable buildings, pavements or curbs. The purpose of this rule is to limit VOC emissions from architectural coatings. In addition, this rule specifies architectural coatings storage, cleanup and labeling requirements. Additional information on how to comply with District Rule 4601 requirements can be found online at: http://www.valleyair.org/rules/currntrules/r4601.pdf

A3-12 cont.

**11f) District Regulation VIII (Fugitive PM10 Prohibitions)**

The project proponent may be required to submit a Construction Notification Form or submit and receive approval of a Dust Control Plan prior to commencing any earthmoving activities as described in Regulation VIII, specifically Rule 8021 – *Construction, Demolition, Excavation, Extraction, and Other Earthmoving Activities*.

Should the project result in at least 1-acre in size, the project proponent shall provide written notification to the District at least 48 hours prior to the project proponents intent to commence any earthmoving activities pursuant to District Rule 8021 (Construction, Demolition, Excavation, Extraction, and Other Earthmoving Activities). Also, should the project result in the disturbance of 5-acres or more, or will include moving, depositing, or relocating more than 2,500 cubic yards per day of bulk materials, the project proponent shall submit to the District a Dust Control Plan pursuant to District Rule 8021 (Construction, Demolition, Excavation, Extraction, and Other Earthmoving Activities). For additional information regarding the written notification or Dust Control Plan requirements, please contact District Compliance staff at (559) 230-5950. A3-12 cont.

The application for both the Construction Notification and Dust Control Plan can be found online at:
https://www.valleyair.org/busind/comply/PM10/forms/DCP-Form.docx

Information about District Regulation VIII can be found online at:
http://www.valleyair.org/busind/comply/pm10/compliance_pm10.htm

**11g) Other District Rules and Regulations**

The Project may also be subject to the following District rules: Rule 4102 (Nuisance) and Rule 4641 (Cutback, Slow Cure, and Emulsified Asphalt, Paving and Maintenance Operations).

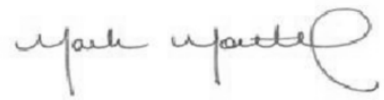
**12) District Comment Letter**

The District recommends that a copy of the District's comments be provided to the Project proponent. A3-13

If you have any questions or require further information, please contact Harout Sagherian by e-mail at Harout.Sagherian@valleyair.org or by phone at (559) 230-5860.

Sincerely,

Brian Clements
Director of Permit Services



Mark Montelongo
Program Manager

San Joaquin Valley
AIR POLLUTION CONTROL DISTRICT

HEALTHY AIR LIVING™

September 25, 2023

Jose Valenzuela
City of Fresno
Planning and Development Department
2600 Fresno Street, 3rd Floor
Fresno, CA 93721

**Project: Draft Environmental Impact Report for Fresno Costco Commercial Center Project – Health Impact Assessment**

**District CEQA Reference No: 20230629**

Dear Mr. Valenzuela:

The San Joaquin Valley Unified Air Pollution Control District (District) has received additional clarification on the health impact assessment for the Draft Environmental Impact Report for Fresno Costco Commercial Center project (Project). The proposed project consists of the construction of a Costco commercial center, located at 7120 North Riverside Drive, in Fresno, CA.

The District has reviewed the health impact assessment and based on the information the Project is not expected to have a potential significant impact on public health. District staff is available to meet with you and/or the applicant to further discuss the regulatory requirements that are associated with this project. If you have any questions or require further information, please contact Harout Sagherian by e-mail at Harout.Sagherian@valleyair.org or by phone at (559) 230-5860.

Sincerely,

Brian Clements
Director of Permit Services

For: Mark Montelongo
Program Manager

**Samir Sheikh**
Executive Director/Air Pollution Control Officer

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# Letter A3 San Joaquin Valley Air Pollution Control District

Mark Montelongo, Program Manager
August 23, 2023

**Response A3-1**
The comment provides introductory statements summarizing the nature of the project. No response is required.

**Response A3-2**
The comment recommends that the project use the cleanest available offroad construction equipment, including the latest tier equipment (e.g., tier 4, when available) to further reduce impacts from construction-related diesel exhaust emissions. As described in Section 4.2.1 of Appendix C of the Draft EIR, the project analysis assumes construction equipment greater than 50 horsepower used at the site would meet US Environmental Protection Agency Tier 3 emission standards for $PM_{10}$ and $PM_{2.5}$ and include particulate matter emissions control equivalent to the California Air Resources Board (CARB) Level 3 verifiable diesel emission control devices. Based on the proposed construction practices and equipment mix, and as shown in Table 3.3-5 and Table 3.3-7 of the Draft EIR, the project impact level is less than significant for construction emissions and health-risk impacts during the construction phase. Mitigation is only required if there are significant environmental effects. (Public Resources Code [PRC] § 21100(b)(3).) An EIR is not required to discuss mitigation measures for impacts when the EIR had determined that such impacts would be less than significant. (North Coast Rivers Alliance v. Marin Municipal Water District (2013) 216 Cal.App.4th 614, 649.) Therefore, these recommendations are noted and will be provided to the decision-making body for consideration. However, because project impacts are less than significant, there is no nexus for the City to require San Joaquin Valley Air Pollution Control District's (SJVAPCD's) recommendations as mitigation in this EIR.

**Response A3-3**
The comment summarizes review of the Air Quality Technical Report (Draft EIR Appendix C) and identifies an apparent inconsistency between the technical data and the summarized conclusions in the appendix and Draft EIR. The City subsequently met with SJVAPCD to discuss these concerns and provide additional technical modeling data. On September 25, 2023, SJVAPCD issued a supplemental comment letter that concurs with the finding reported in the Draft EIR that the project is not expected to have a significant impact on police health.

The analysis in Appendix C and Draft EIR Section 3.3, "Air Quality," are based on a project commitment to use equipment with diesel particulate filters, which result in a reduction in produced particulate matter. Although the project commitment was included in the Draft EIR's analyses, this commitment was inadvertently left out of the Draft EIR's project description. To clarify this commitment, the following text has been added to the second paragraph of Section 2.2.4, "Construction," (Draft EIR page 2-19) in Chapter 2, "Project Description." This text clarifies the information provided in the Draft EIR for greater consistency with the technical analysis.

> Table 2-2 lists equipment anticipated to be used during construction. All equipment used for construction would have Tier 3 engines with diesel particulate filters. In addition, approximately 325 loads of aggregate base would be imported onto the project site and approximately 3,000 cubic yards of utility and foundation spoils would be off hauled. Grading of the project site would be otherwise balanced and would not require additional import or export of soils. All staging would occur on the project site. Trucks would enter the project site from North Riverside Drive and exit the site via North Arthur Avenue.

In addition, one table in Draft EIR Appendix C reported an incorrect construction equipment mix. The corrected version of Table F-1 in the Air Quality Technical Report is provided in Chapter 2 of this Final EIR.

As documented in the supplemental comment letter, based on SJVAPCD's review of all technical data in the record there would not be a new or more severe impact to human health risk than disclosed in the Draft EIR. No further response or revision to the Draft EIR is required.

**Response A3-4**
The comment provides industrial warehouse emission reduction strategies that SJVAPCD recommends to reduce the potential for harmful health effects. The project would comply with all state and local regulations for the gas station

and heavy-duty trucks. As discussed in Section 2.3 of Appendix C of the Draft EIR, the Advanced Clean Trucks regulation, Airborne Toxic Control Measures for on-road diesel vehicles and idling, and the Truck and Bus Regulation (13 California Code of Regulations [CCR] 2025) will require truck fleets to become cleaner over time and electrify as the technology becomes feasible to support it. The project would also comply with applicable SJVAPCD and state regulations for the gasoline service station, such as Rule 4622 and installation of Phase I and Phase II vapor recovery control equipment. In addition, note that the project has been designed to incorporate the following features:

- Delivery truck travel and site entry on designated truck routes that use major roadways and avoid traversing through residential communities.
- Availability of transportation refrigeration unit (TRU) plug-ins at loading docks.
- Loading dock operating protocols to minimize truck idling and associated emissions would require that all regulations concerning idling are followed, each is unloaded efficiently, and trucks do not linger at the loading docks.
- Bicycle parking as required in the City's Municipal Code.
- Non-emergency diesel powered generators would be prohibited during project construction.

Based on modeling that assumes these project commitments, the Draft EIR Section 3.3.3, "Environmental Impacts and Mitigation Measures," (page 3.3-19) concludes that the project would generate less-than-significant air quality and health risk impacts during construction and operation of the project. Therefore, SJVAPCD's recommendations are noted and will be provided to the decision-making body for consideration. However, because project impacts are less than significant, there is no nexus for the City to require SJVAPCD's recommendations as mitigation in this EIR.

Response A3-5

The comment recommends the City evaluate Heavy Heavy-Duty truck routing patterns for the project, with the aim of limiting exposure of residential communities and sensitive receptors to emissions. The Draft EIR includes a health risk assessment that evaluates the emissions from trucks as they approach and depart the project site. The truck routes utilize the most efficient truck routes wherever possible, taking into consideration City-designated truck routes, intersection traffic controls, turn radii at intersections and site accesses, and direction of approach to destinations within the site. The truck routes are identified to minimize impact to surrounding residential areas or sensitive receptors, and to efficiently enter and exit the project site. As shown in Table 3.3-7 of the Draft EIR, the project would result in less-than-significant health risk impacts, demonstrating that there will not be a significant impact resulting from the trucks entering and exiting the project site. The travel routes are shown in Figure 2 of Appendix C of the Draft EIR.

Response A3-6

The comment recommends that the City consider two measures to reduce project-generated operational emissions: use of the cleanest available truck fleet and on-site service equipment. As explained in Response A3-4, Advanced Clean Trucks regulation, Airborne Toxic Control Measures for on-road diesel vehicles and idling, and the Truck and Bus Regulation (13 CCR 2025) will require truck fleets to become cleaner over time and electrify as the technology becomes feasible to support it. In addition, the project would employ electric forklifts, mobility carts, pallet jacks, scissor lifts, floor scrubbers, lift trucks, and combilifts consistent with the recommendation.

Further, any additional mitigation measures in the form of requiring low and zero emission trucks is not required, as operation of these vehicles has not been determined to result in an environmental impact. Mitigation is only required if there are significant environmental effects. (PRC § 21100(b)(3).) An EIR is not required to discuss mitigation measures for impacts when the EIR had determined that such impacts would be less than significant. (North Coast Rivers Alliance v. Marin Municipal Water District (2013) 216 Cal.App.4th 614, 649.) Therefore, SJVAPCD's recommendations are noted and will be provided to the decision-making body for consideration. However, because project impacts are less than significant, there is no nexus for the City to require SJVAPCD's recommendations as mitigation in this EIR.

Response A3-7

The comment recommends that the Draft EIR "include measures to ensure compliance of the state anti-idling regulation (13 CCR § 2485 and 13 CCR § 2480) and discuss the importance of limiting the amount of idling, especially near sensitive receptors. In addition, the District recommends the City consider the feasibility of implementing a more stringent 3-minute idling restriction and requiring appropriate signage and enforcement of idling restrictions."

See Response A3-4. The project would comply with the CARB Air Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling, which is also referred to as 13 CCR § 2485 as referenced by the comment. More specifically, in order to meet the required truck idling limit of 5 minutes, the project includes measures such as posting of appropriate signage at docks delivery areas, each truck to be unloaded efficiently, trucks to not linger at the loading docks, and truck routes that result in efficient traffic flow through the project site to limit truck idling.

The project would result in less-than-significant operational emissions. An EIR is not required to discuss mitigation measures for impacts when the EIR had determined that such impacts would be less than significant. (North Coast Rivers Alliance v. Marin Municipal Water District (2013) 216 Cal.App.4th 614, 649.) Therefore, these recommendations are noted and will be provided to the decision-making body for consideration. However, because project impacts are less than significant, there is no nexus for the City to require SJVAPCD's recommendations as mitigation in this EIR.

Response A3-8

The comment "recommends the City consider the feasibility of incorporating vegetative barriers and urban greening as a measure to further reduce air pollution exposure on sensitive receptors." The Draft EIR Section 3.3.3, "Environmental Impacts and Mitigation Measures," (page 3.3-19) concludes that the project would result in less than significant air quality and health risk impacts during construction and operation of the project. Mitigation is only required if there are significant environmental effects. (PRC § 21100(b)(3).) An EIR is not required to identify mitigation measures for impacts when the EIR had determined that such impacts would be less than significant. (North Coast Rivers Alliance v. Marin Municipal Water District (2013) 216 Cal.App.4th 614, 649.) Further, the project would incorporate vegetation and tree canopy improvements for the site. These include perimeter landscaping along the edges of the project site, as well as landscaping within the parking field. Therefore, the project has incorporated this recommendation, and further mitigation is not required.

Response A3-9

The comment suggests that the City consider incorporating solar power systems as an emission reduction strategy for the project. Costco participates in the PG&E Solar Choice program, which provides 100 percent solar energy to customers, as discussed in Section 3.6 and Section 3.7 of the Draft EIR. The project would also comply with energy efficiency standards of the State's Title 24 California Building Code, which includes a solar-ready roof of the proposed Costco warehouse.

Beyond this specific project, Costco is investing in a sustainable future and implements many measures and programs to that end (see https://www.costco.com/sustainability-introduction.html). For example, Costco owns and operates more than 100 on-site solar systems around the world, with an intention to expand on-site solar operations; having a solar-ready roof on the warehouse of the Costco warehouse will ensure that Costco can install solar panels here in the future.

As shown in Table 3.3-8 of the Draft EIR, the project's air quality impacts during operation would be less than significant (see Impact 3.3-5, page 3.3-25). In addition, the Draft EIR determines in Impact 3.6-1 related to inefficient and unnecessary consumption of energy and Impact 3.6-2 related to conflict with a plan for renewable energy or energy efficiency that the project would have less-than-significant impacts related to energy consumption. Therefore, these recommendations are noted and will be provided to the decision-making body for consideration. However, because project impacts are less than significant, there is no nexus for the City to require SJVAPCD's recommendations as mitigation in this EIR.

Response A3-10

The comment notes that SJVAPCD recommends installation of electric vehicle chargers at project sites, generally, and identifies that the Draft EIR indicates that the project would include electric vehicle charging stations. The project is

committed to constructing and maintaining electric vehicle (EV) chargers in accordance with Part 11 of the 2022 Title 24 California Building Code, as noted on page 3.7-11 of the Draft EIR. A total of 45 EV chargers will be installed, which aligns with the 2022 Title 24 standard of 5 percent of all parking stations equipped with a Level 2 charging station at a minimum. This comment does not address the adequacy of the Draft EIR analysis; therefore, no further response is required. The comment is included in the record, which will be considered by the decision makers in their deliberations over potential approval of the proposed project.

Response A3-11

The comment notes that the project includes construction of bikeways and may be eligible for funding through the District's Bikeway Incentive Program. Because the comment does not raise a substantive issue or provide a recommendation on the content of the Draft EIR, no further response is warranted. The comment is included in the record, which will be considered by the decision makers in their deliberations over potential approval of the proposed project.

Response A3-12

The comment summarizes district rules and regulations that reduce the effect of projects on air quality. Costco will be required to comply with all applicable District rules and regulations governing construction and operation of the project. This comment does not address the adequacy of the Draft EIR analysis; therefore, no further response is required. The comment is included in the record, which will be considered by the decision makers in their deliberations over potential approval of the proposed project.

Response A3-13

The comment recommends that a copy of this letter is provided to the project proponent. All letters received on the Draft EIR have been posted to the City's website (https://www.fresno.gov/planning/plans-projects-under-review/) and are available for public review and download. This comment does not address the adequacy of the Draft EIR analysis; therefore, no further response is required.

# 2.2.2 Organizations

BURKE, WILLIAMS & SORENSEN, LLP
1 California Street - Suite 3050
San Francisco, California 94111-5432
voice 415.655.8100 - fax 415.655.8099
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Letter O1

Direct No.: 415.655.8133
Our File No.: 07500.0005
svelyvis@bwslaw.com

August 28, 2023

Mr. Jose Valenzuela
Supervising Planner City of Fresno
Planning and Development Department
2600 Fresno Street, Room 3043
Fresno, CA 93721
**Via e-mail: jose.valenzuela@fresno.gov**

Re: Costco Wholesale's Comments on the Draft Environmental Impact Report for the Fresno Costco Commercial Center Project

Dear Mr. Valenzuela:

Thank you for providing us the opportunity to review and comment on the Draft Environmental Impact Report ("Draft EIR" or "DEIR") prepared for the Fresno Costco Commercial Center Project, State Clearinghouse Number 2021100443. We represent and provide the comments included herein on behalf of the Project applicant, Costco Wholesale. We have carefully reviewed the Draft EIR and find that its thorough and comprehensive analysis complies with the requirements of the California Environmental Quality Act ("CEQA"). We offer limited comments and requested changes to one mitigation measure within the Draft EIR, as discussed forth below. O1-1

The Transportation section of the DEIR concludes that the Project would result in an unavoidable significant impact associated with the projected increase in vehicle miles traveled ("VMT"). The DEIR acknowledges that most of the increased VMT results from Costco warehouse members, whose shopping trips are not susceptible to reduction through transportation demand management ("TDM") measures. Therefore, while recognizing that Project VMT would be reduced by less than 2 percent even if every employee participated in a commute reduction program, the Draft EIR focuses all TDM mitigation efforts on Costco employees. Measure 3.13-2 requires that Costco provide a mandatory commute reduction program that achieves at least a 26 percent reduction in employee VMT. O1-2

First, while Costco can and will implement logical and feasible TDM strategies, it cannot guarantee the outcome of its efforts. Thus, we request that the mitigation

burke
BURKE, WILLIAMS & SORENSEN, LLP



measure state that Costco shall provide such a program that is "designed to" achieve a certain measure of success. O1-2 cont.

Second, the mitigation measure requires that the VMT reduction goal of the plan be a 26 percent reduction in employee VMT, and the measure lists five specified TDM actions that "may" be included in the TDM plan. While the genesis of the 26 percent VMT reduction goal is not explained in the DEIR, we understand that such number was in fact derived from assuming that all five measures listed within Mitigation Measure 3.13-2 as possible strategies would indeed be implemented. This is not viable given that one of the listed TDM strategies is for Costco to implement an employee-sponsored vanpool. Table 3.13-5 of the DEIR concludes that such a strategy is feasible and applicable to the Project. While Costco can implement four of the five listed strategies, a Costco-sponsored vanpool is not a feasible or effective strategy. The mitigation measure says that a vanpool is "a flexible form of public transportation," but it is not a form of public transportation as stated in the mitigation measure. For this reason alone, it should be removed. Furthermore, Costco would be forced to purchase vans to be driven by its employees, raising issues concerning insurance, liability, equal treatment of employees, and rules (which would be impossible to enforce) concerning private use of the vans when they are off Costco premises. We are not aware of any Costco projects within the state that have been required to implement such a vanpool program. Given these challenges to feasibility of Costco vanpools, we request that this such strategy be deemed infeasible and the mitigation measure (including the VMT reduction percentage goal) be altered accordingly. O1-3

We appreciate the chance to comment on the well-crafted and technically solid Draft EIR and look forward to participating in the CEQA and entitlement process for the Project as it moves forward.

Sincerely,

Anna C. Shimko

Anna C. Shimko

ACS/pm

## Letter O1 Burke, Williams & Sorensen, LLP, on behalf of Costco Wholesale

Anna C. Shimko, Partner
August 28, 2023

**Response O1-1**

The comment provides introductory remarks. This comment includes a statement that supports the adequacy of the CEQA document. No further response is required.

**Response O1-2**

The comment summarizes the mitigation approach in the Draft EIR and requests refinement to the language in Mitigation Measure 3.13-2 to clarify that the applicant's obligation to ensure VMT trip reduction through the employee trip reduction measures. The requested addition of "designed to" has been added to the mitigation measure. See Response O1-3 for the full text of the revised mitigation measure.

This revision clarifies the City's intended approach to implementation of Mitigation Measure 3.13-2 and does not affect the severity of the impact disclosed in the Draft EIR. Pursuant to State CEQA Guidelines Section 15088.5, recirculation of the Draft EIR is not required.

**Response O1-3**

The comment asserts that an employer-sponsored vanpool cannot be included as a component of the Transportation Demand Management (TDM) program required in Mitigation Measure 3.13-2 because of concerns related to insurance liability, equality, and policing the parameters of use. The comment also questions the applicability of the program because it is described as a form of "public" transportation in the Draft EIR and requests that less VMT reduction is required based on the infeasibility of the vanpool.

As explained in the Draft EIR (page 3.13-18):

> Mitigation Measure 3.13-2 would implement Measure T-6 (Mandatory Commute Reduction Program), as identified in the *Handbook for Analyzing Greenhouse Gas Emissions Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equity* (CAPCOA 2021). The implementation of Mitigation Measure 3.13-2 would reduce employee trips. However, employee trips account for 436 daily trips (less than 2 percent of the total daily trips) and 13,385 VMT (approximately 7 percent of the daily VMT). Based on the California Air Pollution Control Officers Association's estimates in the *Quantifying Greenhouse Gas Mitigation Measures Handbook*, Mitigation Measure 3.13-2 could achieve up to a 26 percent reduction in project employee commute VMT (CAPCOA 2021: 86). Implementation of a mandatory commute reduction program with 100 percent employee participation would only result in a 3,480-mile decrease, or less than 2 percent of the proposed project's total daily regional VMT.

The City based the mitigation strategy and language on the California Air Pollution Control Officers Association (CAPCOA) Handbook. The CAPCOA Handbook describes employer-sponsored vanpool (Measure T-11) as "a flexible form of public transit" that can be applied at the project site scale and is best implemented and monitored by the building occupant or employer. Therefore, the wording in the Draft EIR is consistent with applicable guidance and does not improperly characterize the vanpool as a service for the general public. No revision to the Draft EIR is necessary.

Table 3.13-5 of the Draft EIR presents the most recent CAPCOA measures for reducing greenhouse gas emissions within the transportation sector and identifies potentially feasible mitigation to reduce VMT that were derived from the Handbook. The City established the target of a 26 percent reduction in employee VMT based on the maximum potential VMT reduction provided in the CAPCOA Handbook for Commute Trip Reduction Programs (Measure T-6). As explained in the CAPCOA Handbook, this total amount accounts for the potential reductions that could be achieved through the implementation of Measures T-7 through T-11.

Based on the information provided in Comment O1-3, the City has determined that revisions to Table 3.13-5 are required to reflect measures that may be feasibly implemented. As revised, the measure excludes CAPCOA

Handbook TDM Measure T-11 – Provide Employer-Sponsored Vanpool, and, therefore, excludes CAPCOA Handbook TDM Measure T-6 – Implement Commute Trip Reduction Program (Mandatory), of which Measure T-11 is a component. However, the City has identified other project requirements that would be equally effective at reducing VMT. The City concludes that the established 26 percent reduction in employee VMT can be achieved and has not revised this benchmark for compliance as requested in the comment.

The discussion of Mitigation Measure 3.13-2 in the Draft EIR is, therefore, revised as follows:

Mitigation Measures

Table 3.13-3 presents the most recent California Air Pollution Control Officers Association (CAPCOA) *Handbook for Analyzing GHG Emission Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equity* (Handbook) measures for reducing greenhouse gas emissions within the transportation sector. Most of the measures quantified in the CAPCOA Handbook aim to reduce VMT and encourage mode shifts from single-occupancy vehicles to shared (e.g., transit) or active modes of transportation (e.g., bicycle) (CAPCOA 2021). Although all transportation measures are provided below, not all are applicable or feasible given the implementation scale, nature of the proposed project, and/or limited jurisdictional authority of Costco, the applicant, to implement particular measures. The following mitigation measure~~s have been proposed~~ is based on the analysis of feasibility and applicability included in Table 3.13-5.

**Table 3.13-5 Transportation Sector Measures to Reduce VMT**

| | Mitigation Measure | Maximum Potential VMT Reduction[1] | Feasible/Applicable to the project? | Notes |
|---|---|---|---|---|
| T-1 | Increase Residential Density | 30% from project VMT | N/A | The proposed project does not include residential uses. |
| T-2 | Increase Job Density | 30% from project VMT | N/A | This is a plan/communitywide strategy and is not applicable. |
| T-3 | Provide Transit-Oriented Development | 31% from project VMT | N/A | This is a plan/communitywide strategy and is not applicable. |
| T-4 | Integrate Affordable and Below Market Rate Housing | 28.6% from project/site multifamily residential VMT | N/A | The proposed project does not include residential uses. |
| T-5 | Implement Commute Trip Reduction Program (Voluntary) | 4% project/site employee commute VMT | ~~Yes~~ No | ~~See Mitigation Measure 3.13-2 below.~~ Measures T-7 through T-11 must be implemented as part of T-5 to achieve the maximum employee commute VMT reduction. Because T-11 would not be feasible, the commute trip reduction program would not meet the full list of CAPCOA parameters. |
| T-6 | Implement Commute Trip Reduction Program (Mandatory Implementation and Monitoring) | 26% from project/site employee commute VMT | ~~Yes~~ No | ~~See Mitigation Measure 3.13-2 below.~~ Measures T-7 through T-11 must be implemented as part of T-6 to achieve the maximum employee commute VMT reduction. Because T-11 would not be feasible, the commute trip reduction program would not meet the full list of CAPCOA parameters. |
| T-7 | Implement Commute Trip Reduction Marketing | 4% project/site employee commute VMT | Yes | See Mitigation Measure 3.13-2 below. |
| T-8 | Provide Ridesharing Program | 8% project/site employee commute VMT | Yes | See Mitigation Measure 3.13-2 below. |

| | Mitigation Measure | Maximum Potential VMT Reduction[1] | Feasible/Applicable to the project? | Notes |
|---|---|---|---|---|
| T-9 | Implement Subsidized or Discounted Transit Program | 5.5% from employee/resident | Yes | See Mitigation Measure 3.13-2 below. |
| T-10 | Provide End-of-Trip Bicycle Facilities | 4.4% project/site employee commute VMT | Yes | See Mitigation Measure 3.13-2 below. |
| T-11 | Provide Employer-Sponsored Vanpool | 20.4% project/site employee commute VMT | ~~Yes~~ No | ~~See Mitigation Measure 3.13-2 below~~. A private vanpool program would involve the capital cost of purchasing vas plus the operating cost of insurances, would raise liability concerns, and would pose logistical challenges such as equal treatment of employees and rules regarding private use of the vans. This measure cannot be feasibly implemented to reduce VMT. |
| T-12 | Price Workplace Parking | 20% project/site employee commute VMT | N/A | Measure ineffective due to readily available, uncontrolled and free parking in the immediate vicinity of the proposed project. |
| T-13 | Implement Employee Parking Cash-Out | 12% project/site employee commute VMT | N/A | Measure ineffective due to readily available, uncontrolled and free parking in the immediate vicinity of the proposed project. |
| T-14 | Provide Electric Vehicle Charging Infrastructure | -- | N/A | See Mitigation Measure 3.3-2a. This measure does not affect VMT. |
| T-15 | Limit Residential Parking Supply | 13.7% from residences' VMT | N/A | The proposed project does not include residential uses. |
| T-16 | Unbundle Residential Parking Costs from Property Cost | 15.7% from project VMT | N/A | The proposed project does not include residential uses. |
| T-17 | Improve Street Connectivity | 30% from vehicle travel in the plan/community | Yes | The proposed project would construct West Spruce Avenue along the northern project site boundary improving street connectivity. Additionally, the project would construct North Arthur Avenue along the eastern project site boundary, connecting West Spruce Avenue and West ~~Spruce~~ Herndon Avenue. See Chapter 2, "Project Description~~.~~," and Mitigation Measure 3.13-2 below. |
| T-18 | Provide Pedestrian Network Improvement | 6.4% from vehicle travel in the plan/community | Yes | Pedestrian facility improvements provided as part of the proposed project. See Chapter 2, "Project Description~~.~~," and Mitigation Measure 3.13-2 below. |
| T-19-A | Construct or Improve Bike Facility | 0.8% from vehicles parallel roadways | Yes | Bicycle facility improvements provided as part of the proposed project. See Chapter 2, "Project Description~~.~~," and Mitigation Measure 3.13-2 below. |

| | Mitigation Measure | Maximum Potential VMT Reduction[1] | Feasible/Applicable to the project? | Notes |
|---|---|---|---|---|
| T-19-B | Construct or Improve Bike Boulevard | 0.2% from vehicles on roadway | Yes | Bicycle facility improvements provided as part of the proposed project. See Chapter 2, "Project Description-," and Mitigation Measure 3.13-2 below. |
| T-20 | Expand Bikeway Network | 0.5% from vehicles on roadway | Yes | Bicycle facility improvements provided as part of the proposed project. See Chapter 2, "Project Description-," and Mitigation Measure 3.13-2 below. |
| T-21-A | Implement Conventional Carshare Program | 0.15% from vehicle travel in the plan/community | No | This is a plan/communitywide strategy and is not feasible. |
| T-21-B | Implement Electric Carshare Program | VMT reduction not quantified—see CAPCOA handbook | No | This is a plan/communitywide strategy and is not feasible. |
| T-22-A | Implement Pedal (Non-Electric) Bikeshare Program | 0.2% from vehicle travel in the plan/community | No | This is a plan/communitywide strategy and is not feasible. |
| T-22-B | Implement Electric Bikeshare Program | 0.06% from vehicle travel in the plan/community | No | This is a plan/communitywide strategy and is not feasible. |
| T-22-C | Implement Scootershare Program | 0.07% from vehicle travel in the plan/community | No | This is a plan/communitywide strategy and is not feasible. |
| T-23 | Provide Community-Based Travel Planning | 2.3% from vehicle travel in the plan/community | N/A | The proposed project does not include residential uses. This measure applies to residences. |
| T-24 | Implement Market Price Public Parking (On-Street) | 30% from vehicle travel in the plan/community | No | The applicant, Costco, does not have jurisdiction over public on-street parking facilities and operation. |
| T-25 | Extend Transit Network Coverage or Hours | 4.6% from vehicle travel in the plan/community | No | The applicant, Costco, does not have jurisdiction over the operation of transit service. |
| T-26 | Increase Transit Service Frequency | 11.3% from vehicle travel in the plan/community | No | The applicant, Costco, does not have jurisdiction over the operation of transit service. |
| T-27 | Implement Transit-Supportive Roadway Treatments | 0.6% from vehicle travel in the plan/community | No | This is a plan/communitywide strategy and is not feasible. |
| T-28 | Provide Bus Rapid Transit | 13.8% from vehicle travel in the plan/community | No | The applicant, Costco, does not have jurisdiction over the operation of transit service. |
| T-29 | Reduce Transit Fares | 1.2% from vehicle travel in the plan/community | No | This is a plan/communitywide strategy and is not feasible. |
| T-30 | Use Cleaner-Fuel Vehicles | -- | N/A | This measure does not affect VMT. |

Notes:

1: The CAPCOA Handbook identifies the maximum potential GHG reduction associated with identified measures; however, the CAPCOA Handbook concludes that for the particular measures selected, the percent reduction in VMT would be the same as the percent reduction in GHG emissions. For clarity, this table reports reductions in relation to VMT.

VMT = Vehicle Miles Traveled; N/A = not applicable

Source: Mitigation Measures and VMT Reduction Potential provided by CAPCOA 2021 *Handbook for Analyzing Greenhouse Gas Emissions Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equity*

### Mitigation Measure 3.13-2: Provide a ~~Mandatory Commute Reduction~~ Program ~~for~~ to Reduce Costco Employees' VMT by at least 26 Percent

Costco shall provide a ~~Mandatory Commute Reduction~~ program ~~for employees~~ that is designed to achieve~~s~~ at least a 26 percent reduction in employee VMT. The ~~commute reduction~~ program shall be provided to the City for ~~approval~~ acceptance prior to issuance of a certificate of occupancy. Specific actions ~~may~~ must include the following measures described in the California Air Pollution Control Officers Association's 2021 *Handbook for Analyzing Greenhouse Gas Emission Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equity* ~~*Quantifying Greenhouse Gas Mitigation Measures Handbook*~~:

- Commute Trip Reduction Marketing (estimated to result in up to 4 percent employee VMT reduction): Costco shall implement a marketing strategy to promote Costco's commute reduction program. Information sharing and marketing promote and educate employees about their travel choices to the employment location beyond driving such as carpooling, taking transit, walking, and biking, thereby reducing VMT and greenhouse gas emissions. The following features (or similar alternatives) shall be provided:
  - on-site or online commuter information services,
  - employee transportation coordinators,
  - on-site or online transit pass sales, and
  - guaranteed ride home service.
- Provide Ridesharing Program (estimated to result in up to 8 percent employee VMT reduction): Costco shall develop and implement a ridesharing program. Ridesharing encourages carpooled vehicle trips in place of single-occupied vehicle trips, thereby reducing the number of trips, VMT, and greenhouse gas emissions. The following strategies provide examples of a multifaceted approach for promoting a rideshare program:
  - designating a certain percentage of desirable parking spaces for ridesharing vehicles,
  - designating adequate passenger loading and unloading and waiting areas for ridesharing vehicles, and
  - providing an app or website for coordinating rides.
- Implement Subsidized or Discount Transit Program (estimated to result in up to 5.5 percent employee VMT reduction): Costco shall provide free transit passes for employees. Reducing the out-of-pocket cost for choosing transit improves the competitiveness of transit against driving, increasing the total number of transit trips and decreasing vehicle trips. This decrease in vehicle trips results in reduced VMT and, thus, a reduction in greenhouse gas emissions.
- Provide End-of-Trip Bicycle Facilities (estimated to result in up to 4.4 percent employee VMT reduction): Costco shall install and maintain end-of-trip facilities for employee use. End-of-trip facilities include elements such as bike parking, bike lockers, showers, and personal lockers. The provision and maintenance of secure bike parking and related facilities encourages commuting by bicycle, thereby reducing VMT and greenhouse gas emissions.
- ~~Provide Employer-Sponsored Vanpool (estimated to result in up to 20.4 percent employee VMT reduction): Costco shall implement an employer-sponsored vanpool program. Vanpooling is a flexible form of public transportation that provides groups of 5 to 15 people with a cost-effective and convenient rideshare option for commuting. The mode shift from long-distance, single-occupied vehicles to shared vehicles reduces overall commute VMT, thereby reducing greenhouse gas emissions (CAPCOA 2021).~~
- Improve Street Connectivity (estimated to result in up to 30 percent employee VMT reduction): Costco shall construct West Spruce Avenue along the northern site boundary, creating new connections

between West Spruce Avenue and North Aurther Avenue. The increased connectivity and intersection density that would result from these improvements would facilitate shorter trips, thereby reducing VMT.

- **Provide Pedestrian Network Improvements/Construct Bike Facilities/Expand Bikeway Network (estimated to result in up to 10 percent employee VMT reduction[1]):** Costco shall construct new, 12-foot-wide pedestrian and bicycle paths along West Herndon Avenue and North Riverside Drive to improve pedestrian access and connect to a larger bicycle network. This encourages a mode shift from automobiles to biking and walking, resulting in VMT reduction.

As revised, Mitigation Measure 3.13-2 continues to include CAPCOA Handbook TDM Measures T-7 through T-10, which are the other components of TDM Measure T-6 – Implement Commute Trip Reduction Program (Mandatory), and it further incorporates CAPCOA Handbook TDM Measure T-17 – Improve Street Connectivity, T-18 – Provide Pedestrian Network Improvement, Measure T-19-A – Construct or Improve Bike Facility, T-19-B – Construct or Improve Bike Boulevard, and Measure T-20 – Expand Bikeway Network, none of which were accounted for in the Draft EIR's calculation of project VMT or potential VMT reductions.

The set of TDM measures in the revised Mitigation Measure 3.13-2 together would facilitate VMT reductions that are equal to or greater than the reductions expected from the original set of transportation measures derived from CAPOA Handbook Measure T-6 (i.e., 26 percent) because the additional measures facilitate walking and further facilitate bicycling through infrastructure improvements and can shorten travel distances to the project site by providing vehicle network connections. Therefore, the proposed revision would not result in the potential for a substantial increase in the severity of an environmental impact. Moreover, the revised mitigation incorporates attributes of the project that were evaluated in the Draft EIR but not accounted for in the VMT evaluation. For this reason, the revised mitigation would not generate a new significant impact not disclosed in the Draft EIR.

The proposed revisions constitute a clarification of the approach to reducing employee VMT and the revisions identified above are designed to provide equivalent or greater employee VMT reduction. As a category, employee VMT constitutes less than 2 percent of the overall VMT generated by the project. Therefore, any enhanced reduction would not meaningfully affect the level of VMT generated by the project. The project's overall impact would remain significant and unavoidable, consistent with the conclusion presented on page 3.13-17 of the Draft EIR. No new significant environmental impact or substantial increase in the severity of an environmental impact would occur as a result of these revisions. Therefore, these revisions do not constitute significant new information, as defined by *State CEQA Guidelines* Section 15088.5. Thus, pursuant to State CEQA Guidelines Section 15088.5, recirculation of the Draft EIR is not required.

[1] Measures T-18 through T-22-C are in the Neighborhood Design subsector. The VMT reduction from the combined implementation of all measures within this subsector is capped at 10 percent (CAPCOA 2021: 135).

## 3.2.3 Individuals

Letter I1

**From:** Matthew Schellenberg
**To:** Jose Valenzuela
**Subject:** Biggest Costco
**Date:** Friday, July 21, 2023 3:15:21 PM

**External Email:** Use caution with links and attachments

I heard about the new Costco being planned on Herndon and 99 in Fresno. Make it happen dude! I1-1

Matthew Schellenberg
Fresno resident

### Letter I1 Matthew Schellenberg

July 21, 2023

Response I1-1

The comment expresses support for the proposed project. This comment does not address the adequacy of the Draft EIR analysis; therefore, no revisions to the Draft EIR are necessary in response to this comment. The comment is included in the record, which will be considered by the decision makers in their deliberations over potential approval of the proposed project.

Letter I2

**From:** Teresa Sanchez
**To:** Jose Valenzuela
**Subject:** Costco
**Date:** Friday, July 21, 2023 2:07:25 PM

External Email: Use caution with links and attachments

Hello. I am a resident here in Fresno. I live off of Herndon and Milburn Ave. I would like to add my comment in the future Costco. I would absolutely love having their business in that location. I2-1

Thank you

Teresa Sanchez

Sent from my iPhone

### Letter I2 Teresa Sanchez

July 21, 2023

Response I2-1

The comment expresses support for the proposed project. This comment does not address the adequacy of the Draft EIR analysis; therefore, no revisions to the Draft EIR are necessary in response to this comment. The comment is included in the record, which will be considered by the decision makers in their deliberations over potential approval of the proposed project.

Letter I3

**From:** DOLORES
**To:** Jose Valenzuela
**Subject:** Costco expansion
**Date:** Wednesday, July 19, 2023 12:37:36 PM

**External Email:** Use caution with links and attachments

Horrors! Bigger is not better. Seniors like myself are overwhelmed by the enormous, confusing size of mega stores. We become the central figure looking for one single item without a clue where it might be located. Of course, there are no employees visable to assist you on your search.

As I ruminate about the size and location of a new Costco, I simply will state NO, NO, NO & NO. It's great for residents living in the Herndon/Riverside location. (I currently live at West & Barstow & will then shop at the Blackstone store) I will not be in my present location by the time the new Costco is open. At ages 93 and 96, my husband & I will have moved on to a wonderful, new life in Heaven. Shopping at Costco will not be an issue. I3-1

Accessability to gas at the Shaw Avenue location is a wise decision. I utilize this service regularly and would not travel the extra 3 + miles to the Herndon location for gas and groceries.

Since I am not a Fresno Bee subscriber, I will have to follow this through items posted on internet. I realize this development will not be completed for quite some time in the future.

Sincerely,

Dolores Davidian
2079
W. Barstow Avenue
Fresno, CA 93711
559 439-0888
doloresdavidian@sbcglobal.net

## Letter I3 Dolores Davidain

July 19, 2023

Response I3-1

This comment expresses concern about the size and location of the proposed project, primarily due to accessibility for senior citizens. The comment notes that the new location may benefit nearby residents and supports retention of the gas station existing gas station on Shaw Avenue.

The scale of the Costco facilities is integral to the bulk warehouse business model and creates the potential for various shopping efficiencies. For clarification, page 2-10 the Draft EIR states that the warehouse retail building footprint would occupy an overall footprint of 241,342 square feet; however, the total retail area would only occupy 162,264 square feet and the remaining space would primarily be used for Costco loading, storage, and receiving operations. As revised (see Chapter 1), the warehouse portion of the footprint would be reduced by 22,216 square feet to 140,048 square feet and the total warehouse retail building footprint would be 219,126 square feet. In comparison, the existing Costco warehouse at 4500 West Shaw Avenue has a footprint of 134,000 square feet, which is approximately 6,000 square feet smaller than the portion of the proposed Costco warehouse that would be accessible to the general public.

This comment does not address the adequacy of the Draft EIR analysis; therefore, no revisions to the Draft EIR are necessary in response to this comment. The comment is included in the record, which will be considered by the decision makers in their deliberations over potential approval of the proposed project.

**Letter I4**

**From:** Vern Valmonte
**To:** Jose Valenzuela
**Subject:** Riverside drive Costco
**Date:** Tuesday, July 18, 2023 11:15:52 AM

**External Email:** Use caution with links and attachments

Hello,

I am voicing my concerns about the proposed Costco location on Riverside Drive in NW Fresno. As it is currently we have a abundance of traffic violators such as speeding and failure to stop at the stop sign at Spruce and Riverside. Adding a Costco location will increase the traffic through this area and subsequently increase the traffic violations; not to mention the traffic impact on the Herndon eastbound thoroughfair as it has only two lanes. I4-1

Another concern is the current amount of the unhoused population in the area. Will adding a Costco increase the amount of unhoused and vagrants roaming our area? I4-2

Thank you for taking time to hear from us.

Sincerely,

Vernon Valmonte

## Letter I4 Vernon Valmonte

July 18, 2023

Response I4-1

This comment expresses concerns about traffic violations on local roadways, existing traffic conditions, and the proposed project's contributions to traffic. CEQA does not include provisions for evaluating impacts related to traffic violations. Further, although the topic of traffic congestion is a factor for consideration by the decision-makers in acting on the proposed project, this topic is addressed outside of the CEQA review process.

On December 28, 2018, the California Resources Agency certified and adopted updates to the CEQA Guidelines which included the adoption of CCR Section 15064.3, "Determining the Significance of Transportation Impacts." Pursuant to CCR Section 15064.3, automobile delay and similar metrics relating to vehicular roadway capacity and traffic congestion were eliminated as the basis for determining significant impacts, effectively being replaced with VMT as the primary metric to identify transportation-related impacts under CEQA. Accordingly, traffic congestion is not considered a significant impact on the environment under CEQA.

As stated on page 3.13-11 of the Draft EIR, the significance criteria used to evaluate the proposed project's impacts to transportation under CEQA are based on Appendix G of the CEQA Guidelines, City of Fresno *CEQA Guidelines for VMT Thresholds,* and CEQA Guidelines Section 15064.3. The Draft EIR identified the following impacts related to transportation that would remain significant and unavoidable, even with implementation of mitigation measures:

- Impact 3.13-2: Conflict or Be Inconsistent with CEQA Guidelines Section 15064.3, Subdivision (b) Regarding Vehicle Miles Traveled (refer to pages 3.13-13 through 3.13-18 of the Draft EIR); and
- Impact 3.13-3: Substantially Increase Hazards Due to a Geometric Design Feature (e.g., Sharp Curves or Dangerous Intersections) or Incompatible Uses (e.g., Farm Equipment) (refer to pages 3.13-19 through 3.13-21 of the Draft EIR).

CEQA does not preclude a public agency from approving or carrying out a project that has potential to result in significant and unavoidable impacts on the environment. Rather, CEQA is intended to: (1) inform government decisionmakers and the public about the potential environmental effects of proposed activities; (2) identify the ways that environmental damage can be avoided or significantly reduced; (3) prevent significant, avoidable environmental damage by requiring changes in projects, either by the adoption of alternatives or imposition of mitigation measures; and (4) disclose to the public why a project was approved if that project has significant environmental impacts that cannot be mitigated to a less than significant level. CEQA Guidelines Section 15091 and Public Resources Code Section 21081 require a public agency to identify the significant impacts of a project and make one or more written findings for each impact. When significant and unavoidable impacts are identified, the public agency is also required to issue a statement of overriding considerations. The statement of overriding considerations is a written statement explaining the specific reasons why the social, economic, legal, technical, or other beneficial aspects of the proposed project outweigh the unavoidable adverse environmental impacts and why the lead agency is willing to accept such impacts.

This comment does not offer any specific concern related to the adequacy of the Draft EIR; therefore, no revisions to the Draft EIR are necessary in response to this comment. The comment is included in the record, which will be considered by the decision makers in their deliberations over potential approval of the proposed project.

Response I4-2

The comment expresses concerns that the proposed project would increase the presence of unhoused populations in the project vicinity. CEQA does not include provisions for consideration of unhoused populations separate and distinct from the analysis of a project's impacts on the environment. CEQA requires lead agencies to consider the effects of a proposed project on the physical environment. Specifically, CEQA Guidelines Section 15131 states:

> Economic or social effects of a project shall not be treated as significant effects on the environment. An EIR may trace a chain of cause and effect from a proposed decision on a project through anticipated economic or social changes resulting from the project to physical changes caused in turn by the economic or social changes. The intermediate economic or social changes need not be analyzed in any detail greater than necessary to trace the chain of cause and effect. The focus of the analysis shall be on the physical changes.

As explained on page 1-5 of the Draft EIR, the project would not remove any existing housing and would not displace any people or housing. Therefore, there is no evidence to support the concern that the project would increase the unhoused population in the area. The issue raised by the commenter is considered speculative and beyond the scope of CEQA; therefore, no revisions to the Draft EIR are necessary in response to this comment. The comment is included in the record, which will be considered by the decision makers in their deliberations over potential approval of the proposed project.

Letter I5

**From:** Denise. King
**To:** Jose Valenzuela
**Subject:** Against Costco at Herndon & Riverside
**Date:** Monday, July 17, 2023 5:00:09 PM

External Email: Use caution with links and attachments

Please submit this email on my behalf as a written public comment AGAINST the development of the Costco super center at Herndon & Riverside in northwest Fresno.

To disrupt this area of homes with young families by adding the environmental impact of not only the magnitude of traffic this will bring of just shoppers but the amount of delivery trucks starting in the wee hours of the morning and gasoline delivery trucks, as well as fumes and hazards from the emissions of these vehicles is just unthinkable. Young families and retirees, such as ourselves moved into this area because of the homes, the parks and the distance from the massive commercial development such as this planned Costco, not because they were going to be living next-door to a massive retail giant and gasoline station. The increase traffic will create a major safety concern for all the children to catch school buses and have to walk to and from their school bus pick ups and drop off with the amount of traffic it will be generated. As well as the large number of elderly people who do walk in this area will not be able to because of the volume of traffic. The pollution, the dust, and the safety concerns will take away our daily ability for that exercise, and that enjoyment that we have been able to have since we have lived here. It is not right, but the city with this development will have the power to take away from our ability to continue to live our own healthy daily, lives by performing our daily outdoor activities
There are just too many other areas where you do not have homes immediately next-door, where this Costco could be developed in the Fresno area. Please give serious serious consideration to our plea to find a better solution.
Thank you for your thoughtful consideration.
Denise King
7386 N Lacey Dr
831-233-4320

I5-1

# Letter I5 Denise King

July 17, 2023

Response I5-1

The comment expresses opposition to the proposed project. The comment states that the proposed project would result in environmental impacts related to increased traffic and pedestrian safety hazards, including school-aged children and the elderly. Please refer to Response I4-1 for a discussion regarding the proposed project's impacts related to transportation, including VMT and safety hazards. As described in Section 3.13, "Transportation and Circulation," in the Draft EIR (see Impact 3.13-1, page 3.13-12):

> There are no existing bicycle or pedestrian facilities along the proposed project site boundary. Trail improvements provided by the proposed project would include Class I bicycle facilities along the project's frontage on West Herndon Avenue and North Riverside Drive which is consistent with future facilities identified in the City of Fresno's ATP (City of Fresno 2016) adjacent to the proposed project site. The proposed project also involves the construction of West Spruce Avenue along the northern proposed project site boundary. The City has identified the construction of Spruce Avenue, including Class II bicycle facilities, as a condition of approval (City of Fresno 2022), which would be consistent with the City of Fresno's ATP.

Therefore, pedestrian mobility in the vicinity may be improved through development of the project. Based on the lack of existing public facilities and the proposed public pedestrian infrastructure, the Draft EIR concludes that the proposed project would not conflict with planned pedestrian facilities. Further, the City of Fresno has met with the Central Unified School District regarding the proposed project to ensure that project-related truck deliveries do not pose a safety hazard for students at school bus drop-off/pick-up locations.

Regarding delivery trucks, the Draft EIR (see page 2-20) describes an anticipated delivery schedule between approximately 2:00 and 10:00 a.m. at a rate of two to three trucks per hour and a total of approximately 10 to 13 trucks per day for the warehouse. Fuel would be delivered to the gas station in two to three trucks per day, and the tire center would receive shipments once or twice a week. As disclosed in Chapter 2, "Project Description," of the Draft EIR (see page 2-14), the primary truck access route would be the southernmost driveway along North Arthur Avenue, with a secondary truck route using the southernmost driveway along North Riverside Drive, minimizing exposure of existing residents to truck traffic. The truck loading dock would be located on the southern facade of the warehouse building.

As explained in Response I4-1, the Draft EIR evaluates the potential for the project to generate VMT. CEQA Guidelines Section 15064.3(a) states that VMT refers to the amount and distance of **automobile** travel attributable to a project. The City's CEQA Guidelines and the OPR Technical Advisory describe that the term "automobile" as used in Section 15064.3(a), refers to on-road passenger vehicles, specifically cars and light trucks; heavy vehicles are not included in the definition. Therefore, heavy-duty trucks (i.e., delivery trucks) were not included in the VMT analysis. However, it should be noted that the LOS analysis presented in the *Fresno Costco Relocation Transportation Impact Analysis*, which is included as Appendix D to the Draft EIR, does include truck traffic. In addition, truck traffic is evaluated as a component of the project in Section 3.3, "Air Quality," and Section 3.11, "Noise and Vibration," of the Draft EIR.

The comment states that the proposed project would result in hazardous fumes, vehicle emissions, pollution, and dust. Pages 3.3-19 through 3.3-25 in Section 3.3, "Air Quality," of the Draft EIR address the proposed project's impacts related to criteria air pollutants, including exhaust and fugitive dust from construction (Impact 3.3-1) and operation (Impact 3.3-2); toxic air contaminants (Impact 3.3-3); carbon monoxide concentrations (Impact 3.3-4); and odors (Impact 3.3-4). The analysis incorporates the project-specific traffic modeling performed for the project. The Draft EIR concludes that each of these impacts would be less than significant, and no mitigation measures are required.

Heavy vehicle noise associated with loading and delivery is evaluated in Impact 3.11-3. The analysis found that interior noise levels at the nearest surrounding residences would be approximately 35 decibels (dB) $L_{eq,}$ which is below the City's interior noise standard of 45 dB. However, because noise generated by the loading dock would potentially exceed exterior noise standards, Mitigation Measure 3.11-3 has been identified. Through application of this mitigation, the project applicant would be required to construct a sound wall or other noise attenuating feature west of the loading docks with a demonstrated ability to result in a 4 dB noise decrease at the existing residences along North Riverside Drive. Specifically, for all outdoor construction activity that is to take place outside of the City of Fresno construction noise exception timeframes (i.e., 10:00 p.m. and 7:00 a.m., Monday through Saturday, and all hours of the day on Sunday), and that is anticipated to generate interior noise levels at sensitive receptors that exceed the City of Fresno General Plan interior noise standard of 45 dB for residential land uses, the construction contractor would:

- obtain an exception to Article 1, "Noise Regulations," through the Chief Administrative Officer;
- install temporary noise curtains as close as possible to the noise-generating activity such that the curtains obstruct the direct line of sight between the noise-generating construction activity and the nearby sensitive receptors;
- use noise-reducing enclosures and techniques around stationary noise-generating equipment;
- operate heavy-duty construction equipment at the lowest operating power possible;
- equip construction equipment with back-up alarms that are either audible self-adjusting backup alarms or alarms that only sound when an object is detected; and
- provide a minimum of one week of advanced notice to owners of all residential located within 350 feet of where nighttime construction activity would take place.

With application of the mitigation, the City's noise standards would be achieved, and the impact would be less than significant.

Finally, the comment indicates that there are other locations in the Fresno area that may be more appropriate for the proposed project based on proximity to residential uses. No Specific sites are identified. Please refer to Chapter 6, "Alternatives," in the Draft EIR, which provides a brief analysis of three potential site alternatives.

This comment does not offer any specific concern related to the adequacy of the Draft EIR; therefore, no revisions to the Draft EIR are necessary in response to this comment. The comment is included in the record, which will be considered by the decision makers in their deliberations over potential approval of the proposed project.

Letter I6

**From:** Sharon Ross
**To:** Jose Valenzuela
**Subject:** Costco
**Date:** Monday, July 17, 2023 3:49:59 PM

External Email: Use caution with links and attachments

I object to the additional pollution and congestion this will bring to my home area. Semi trucks delivering all hours of day and night. I6-1
Sharon Ross

Sent from my iPhone

## Letter I6 Sharon Ross

July 17, 2023.

Response I6-1

The comment expresses concerns related to project-generated traffic congestion and pollution. Section 3.3, "Air Quality," and Section 3.13, "Transportation and Circulation," of the Draft EIR include analyses related to these topics. This comment is similar to Comments I4-1 and I5-1. Please refer to Response I4-1 for a discussion regarding the proposed project's impacts related to transportation and Response I5-1 for a discussion regarding the proposed project's impacts related to air quality. This comment does not offer any specific concern related to the adequacy of the Draft EIR; therefore, no revisions to the Draft EIR are necessary in response to this comment. The comment is included in the record, which will be considered by the decision makers in their deliberations over potential approval of the proposed project.

Letter I7

**From:** SUSAN HANSEN
**To:** Jose Valenzuela
**Subject:** new costco
**Date:** Monday, July 17, 2023 2:55:52 PM

**External Email:** Use caution with links and attachments

hi I am excited! I live in Madera and heard whispers of this awhile back, just taping my toe waiting for it to get started. Make it happen. just put multiple entrance exits and the traffic will turn out. Can we get to it from the new ramps being built just south of there on 99? I7-1
Excirted in Madera!
Susan Hansen

## Letter I7 Susan Hansen

July 17, 2023

Response I7-1

The comment expresses support for the proposed project. The comment also provides suggestions related to site access and asks if site access will connect to the State Route (SR) 99 freeway ramps. Pages 2-13 through 2-14 of the Draft EIR provide a description of the proposed access points to the project site, which include driveways along North Riverside Drive, West Herndon Avenue, and North Arthur Avenue. Regional access to the project site from SR 99 would be provided from West Herndon Avenue. The Veterans Boulevard interchange on SR 99 that is under construction may also provide access. This comment does not address the adequacy of the Draft EIR analysis; therefore, no revisions to the Draft EIR are necessary in response to this comment. The comment is included in the record, which will be considered by the decision makers in their deliberations over potential approval of the proposed project.

Letter I8

**From:** Claudia Readwright
**To:** Jose Valenzuela
**Subject:** Will it be Cycle-friendly at the future Costco?
**Date:** Monday, July 17, 2023 12:12:38 PM

External Email: Use caution with links and attachments

Dear City supervising planner,
My wish is for a trike-friendly Costco.
I regularly shop at Costco. 90% of the time I ride my trike. Currently there isn't a bike rack …so, friends and I are forced to lock our cycles to the shopping cart corral. (which isn't ideal)
As you can see from this photograph, shopping at Costco on a cycle is possible. I just wish it was more cycle-friendly.
When planning… I would sure appreciate you keeping cyclists in mind.
Thank you,
Claudia READWRIGHT

I8-1



Sent from my iPhone

## Letter I8 Claudia Readwright

July 17, 2023

Response I8-1

This comment requests that bicyclists are considered in project planning and that the project include bicycle facilities for customers. As discussed on page 3.13-12 of the Draft EIR, the proposed project would provide short-term bicycle parking as required by the City Municipal Code (Article 24, Section 15-2429) and Class I and II bicycle facilities along the proposed project frontages. This comment does not address the adequacy of the Draft EIR analysis; therefore, no revisions to the Draft EIR are necessary in response to this comment. The comment is included in the record, which will be considered by the decision makers in their deliberations over potential approval of the proposed project.

Letter I9

**From:** Shahzaib Zaman
**To:** Jose Valenzuela
**Subject:** Costco
**Date:** Monday, July 17, 2023 11:58:37 AM

External Email: Use caution with links and attachments

Moving Costco to Herndon will create issues for school buses, students , traffic, student theft already , congestion, I-9-1

Not a smart plan
Sent from my iPhone

## Letter I9 Shahzaib Zaman

July 17, 2023

Response I9-1

The comment expresses concerns related to school buses, students, traffic, student theft, and congestion. This comment is similar to Comments I4-1 and I5-1. Please refer to Responses I4-1 and I5-1 for a discussion regarding the proposed project's impacts related to transportation, including VMT and safety hazards. In addition, CEQA does not include provisions for evaluating impacts related to theft. This comment does not offer any specific concern related to the adequacy of the Draft EIR; therefore, no revisions to the Draft EIR are necessary in response to this comment. The comment is included in the record, which will be considered by the decision makers in their deliberations over potential approval of the proposed project.

Letter I10

**From:** Ti Atwal
**To:** Jose Valenzuela
**Subject:** Herndon Costco
**Date:** Monday, July 17, 2023 8:50:25 AM

External Email: Use caution with links and attachments

Hello, my name is Tj. I live in nearby neighborhoods. I don't think Costco should be allowed to move here, and rezone existing zonings. The traffic is already beyond bad during school hours and 5 o clock rush. We have 8 gas stations in the area less than 1-2 mile, allowing them to put a 32 pump gas station that undercuts local gas stations causes significant damage to them. Will have cars sitting for hours at the station waiting to pump gas, and can potentially put other established businesses out of their primary income causing them to foreclose/bankrupt. Meaning eye sores or hard to redevelop sites. The two gas stations across the street are brand new developments, allowing Costco to do' car wash & gas station would be allowing a monopoly in the city of fresno & ruin neighborhoods allowing a giant to control the city for profits. I10-1

## Letter I10 Tj Atwal

July 17, 2023

Response I10-1

The commenter expresses concerns related to rezoning. Rezoning, in and of itself, is not necessarily a significant impact under CEQA; however, CEQA is concerned with whether a project would result in a significant environmental impact due to a conflict with relevant plans, policies, and zoning regulations adopted for the purpose of avoiding or mitigating an environmental effect. The environmental effects that would result from the proposed changes to the general plan land use designations, zoning, and parking lot standards are evaluated throughout the Draft EIR. Refer to Impact 3.10-1 in Section 3.10, "Land Use and Planning," (pages 3.10-5 through 3.10-7 of the Draft EIR) for a discussion of the potential for the project to cause a significant environmental impact due to a conflict with zoning adopted for the purpose of avoiding or mitigating an environmental effect. This comment does not offer any specific concern related to the adequacy of the Draft EIR; therefore, no revisions to the Draft EIR are necessary in response to this comment.

Please refer to Response I4-1 for a response to concerns regarding traffic.

The commenter also expresses concerns that the project would result in the foreclosure or bankruptcy of established businesses resulting in "eye sores or hard to redevelop sites." As discussed in Response I4-2, CEQA requires lead agencies to consider the effects of a proposed project on the physical environment. The proposed project's economic effects on local gas stations in the vicinity of the project site is not, in and of itself, a significant impact under CEQA. Further, the potential for the proposed project to result in the closure of established gas station businesses and consequently result in indirect environmental impacts, such as urban blight, is largely speculative. The commenter does not support the opinion that the proposed Costco gas station would substantially affect operations of the eight gas stations noted in the vicinity of the project, nor is there justification provided for the assumption that individuals would choose to wait "hours" for gas at the proposed station. Notably, the Costco gas station would be a member-only facility offset from the main thoroughfare (Herndon Avenue) with limited hours that would not offer auxiliary attractions such as convenience store products and customer restrooms. It is anticipated that trips to the proposed gas station would be combined with visits to the Costco warehouse.

An evaluation of the potential for the Costco relocation and gas station to result in urban decay impacts was conducted by ALH Urban and Regional Economics in 2023. This analysis concludes that the proposed Costco gas

station would have minimal effects on existing gas stations and would not result in strong sales declines. No existing gas stations were identified as likely to close and urban decay is not anticipated to result (see Appendix A).

Therefore, no revisions to the Draft EIR are necessary in response to this comment. The comment is included in the record, which will be considered by the decision makers in their deliberations over potential approval of the proposed project.

**Letter I11**

**From:** Rey Alvarez
**To:** Jose Valenzuela
**Subject:** Costco Opposition
**Date:** Monday, July 17, 2023 8:47:42 AM

External Email: Use caution with links and attachments

Hello Sir,

I saw your email address in the Fresno Bee. I am writing to express my vehement displeasure with the proposal of the new Costco on Herndon Ave. I have lived off of Grantland Ave for 10 years and in the last few years the traffic has become unbearable. A drive that should take 15 min takes me 25-30 minutes because of the traffic both on Herndon and on Grantland.

The addition of a new Costco will only compound the traffic issues. Not only do we have to deal with a train that causes major traffic issues, we have high speed rail that has caused issues and now a potential Costco. Is the city punishing us for living in this area? Have city officials driven on Shaw near the Costco and seen the traffic mess? I11-1

I don't even have time to mention all the environmental issues that a Costco may cause. I am being sarcastic, but pollution isn't an issue in the valley. If a Costco is built, we will more than likely move. I11-2

Respectfully,

Rey Alvarez

Sent from my iPhone

## Letter I11 Rey Alvarez

July 17, 2023

Response I11-1

The comment expresses opposition to the proposed project and concerns related to project-generated traffic. Although the topic of traffic congestion is a factor for consideration by the decision-makers in acting on the proposed project, pursuant to CCR Section 15064.3, automobile delay and similar metrics relating to vehicular roadway capacity and traffic congestion are not considered a significant impact on the environment under CEQA. Please refer to Response I4-1.

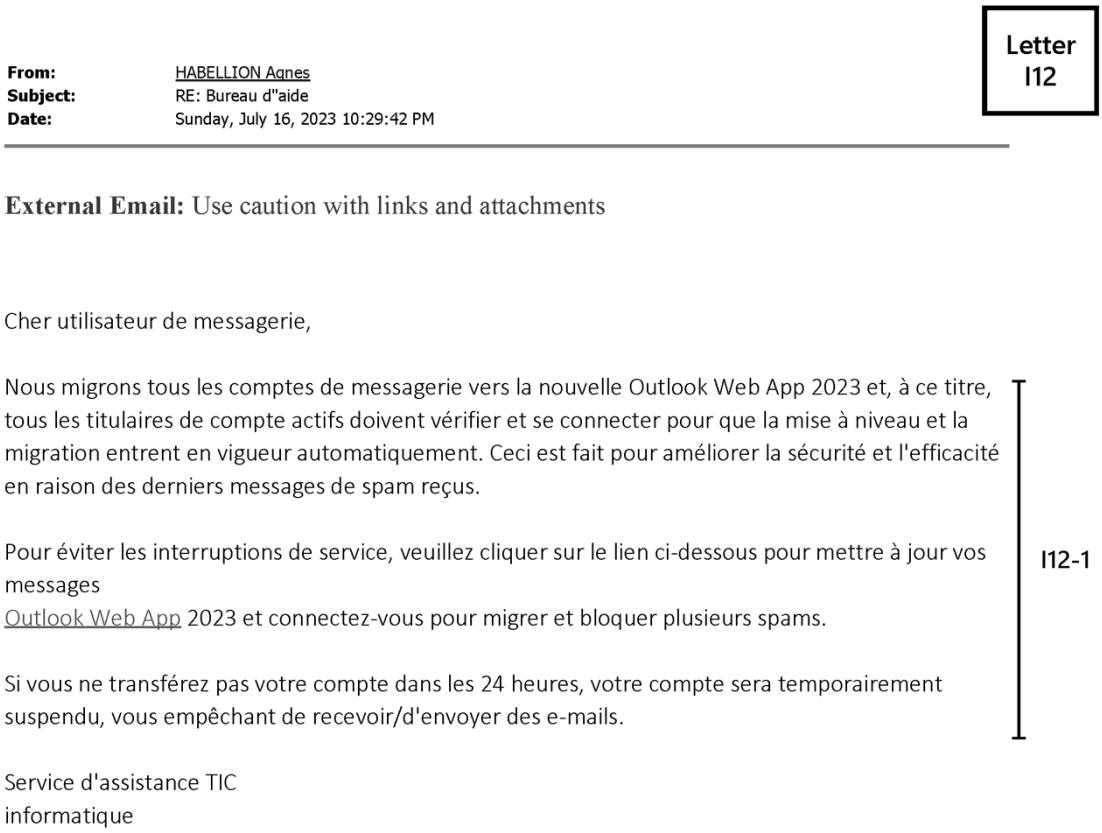
This comment does not offer any specific concern related to the adequacy of the Draft EIR; therefore, no revisions to the Draft EIR are necessary in response to this comment. The comment is included in the record, which will be considered by the decision makers in their deliberations over potential approval of the proposed project.

Response I11-2

The comment generally states that the proposed project may cause environmental issues, including pollution. Section 3.3, "Air Quality," of the Draft EIR includes an analysis related to this topic. Pages 3.3-19 through 3.3-25 address the proposed project's impacts related to criteria air pollutants, including exhaust and fugitive dust, from construction (Impact 3.3-1) and operation (Impact 3.3-2); toxic air contaminants (Impact 3.3-3); carbon monoxide

concentrations (Impact 3.3-4); and odors (Impact 3.3-4). The Draft EIR concludes that each of these impacts would be less than significant, and no mitigation measures are required.

This comment does not offer any specific concern related to the adequacy of the Draft EIR; therefore, no revisions to the Draft EIR are necessary in response to this comment. The comment is included in the record, which will be considered by the decision makers in their deliberations over potential approval of the proposed project.



Letter I12

**From:** HABELLION Agnes
**Subject:** RE: Bureau d"aide
**Date:** Sunday, July 16, 2023 10:29:42 PM

**External Email:** Use caution with links and attachments

Cher utilisateur de messagerie,

Nous migrons tous les comptes de messagerie vers la nouvelle Outlook Web App 2023 et, à ce titre, tous les titulaires de compte actifs doivent vérifier et se connecter pour que la mise à niveau et la migration entrent en vigueur automatiquement. Ceci est fait pour améliorer la sécurité et l'efficacité en raison des derniers messages de spam reçus.

Pour éviter les interruptions de service, veuillez cliquer sur le lien ci-dessous pour mettre à jour vos messages
Outlook Web App 2023 et connectez-vous pour migrer et bloquer plusieurs spams.

Si vous ne transférez pas votre compte dans les 24 heures, votre compte sera temporairement suspendu, vous empêchant de recevoir/d'envoyer des e-mails.

Service d'assistance TIC
informatique

I12-1

## Letter I12 Agnes Habellion

July 16, 2023

Response I12-1

The comment does not pertain to the proposed project; therefore, no response is required.

Letter I13

**From:** David or Lin Faeth
**To:** Jose Valenzuela
**Subject:** New Costco on Shaw
**Date:** Sunday, July 16, 2023 10:24:39 PM

**External Email:** Use caution with links and attachments

Hi - I know Costco Corp runs a very tight ship but I wonder if they shouldn't take local climate into consideration with each new store.

It's HOT here! How about planting more and larger trees?

How about coating the parking lot with that heat reflective sealant that LA is using?

How about building low 2 storey parking garages topped with solar panels instead of paving vast parking lots? They'd better be planning to cover their giant flat roof space with solar panels as well!

This huge company needs to become a bigger part of local solutions than just generally reducing carbon emissions (as touted by their Co. website).

I13-1

Sincerely,

Linnea and David Faeth
4325 W. Fremont Ave.
Fresno 93722
240-0625

## Letter I13 Linnea and David Faeth

July 16, 2023

Response I13-1

The comment expresses concerns related to the local climate and provides design recommendations to reduce carbon emissions. Section 3.7, "Greenhouse Gas Emissions and Climate Change," of the Draft EIR includes a discussion of the proposed project's impacts related to GHG emissions and climate change. As described on pages 3.7-11 through 3.7-13 of the Draft EIR, the proposed project includes various design features that mirror the GHG reduction measures in the City's adopted greenhouse gas reduction plan, which include participating in Pacific Gas and Electric Company's (PG&E's) Solar Choice program to procure 100 percent of its electricity from solar resources, implementing a solid waste diversion program, and installing electric vehicle chargers. In addition, as noted on page 2-17, the proposed project would provide landscaping in accordance with the City's shading requirements. This comment does not address the adequacy of the Draft EIR analysis; therefore, no revisions to the Draft EIR are necessary in response to this comment. The comment is included in the record, which will be considered by the decision makers in their deliberations over potential approval of the proposed project.

Letter I14

**From:** Alana Lewis
**To:** Jose Valenzuela
**Subject:** Proposed Nee Costco location
**Date:** Sunday, July 16, 2023 8:30:35 PM

External Email: Use caution with links and attachments

Dear Mr. Valenzuela,

My name is Alana Lewis and I live near the Costco Shaw location. I shop at this location as well. I have been asking management there, for years to please expand! The store is not big enough to serve the community on the west side of Fresno. The parking is a nightmare! Trying to get gas is insane as it's ALWAYS congested at the entrance on N Blythe (in and out). Shaw and Blythe is always congested as it is because of the railroad crossing. That's a conversation for another day, ONLY two lanes on each side of Shaw! Ugh. Anyway, thank you for letting me give my input. Have a blessed evening! I14-1

Respectfully, Alana L Lewis
3694 N State St, Fresno, CA 93722
(559) 314-4281

## Letter I14 Alana L. Lewis

July 16, 2023

Response I14-1

The comment expresses support for the proposed project. This comment does not address the adequacy of the Draft EIR analysis; therefore, no revisions to the Draft EIR are necessary in response to this comment. The comment is included in the record, which will be considered by the decision makers in their deliberations over potential approval of the proposed project.

Letter I15

**From:** Sharon HENSON
**To:** Jose Valenzuela
**Subject:** Costco plans
**Date:** Sunday, July 16, 2023 7:09:19 PM

External Email: Use caution with links and attachments

Sent from my iPhone
I'm very concerned what this will do to the peace in our neighborhoods. I've been here for thirty years on Sandrini Ave. This is a quiet and peaceful area. If Spruce Ave is opened for traffic to go through to Riverside Drive and connect the road Arthur as it is proposed this would change the our neighborhood negatively. We don't want to see Spruce Ave opened up. I'm also concerned about all the Pumps and the car wash at the north end by the golf course. All the cars idling to get gas at the pumps and your proposing so many of them plus a car wash will impact not only our back yard air quality but the ponding basin with all wildlife that inhabits there. Shouldn't the pumps and car wash be put next to Herndon Ave? please respond to my concerns. Sharon Henson 559-360-6370

I15-1

## Letter I15 Sharon Henson

July 16, 2023

Response I15-1

The comment expresses concern related to the effect of the proposed completion of Spruce Avenue on the character of surrounding neighborhoods. As evaluated in the Draft EIR, the applicant would extend West Spruce Avenue from North Riverside Drive to the intersection with North Sandrini Avenue. As discussed on page 3.13-19 of the Draft EIR, extending West Spruce Avenue would be consistent with the City's planned roadway system depicted on Figure MT-1 of the City's General Plan Mobility and Transportation Element. Accordingly, the City's Traffic Planning Section would require the project proponent to extend West Spruce Avenue as a condition of project approval. The asphalt roadway would be a City street and would include curb, gutter, sidewalk, Class II bicycle facilities, and streetlights.

Section 3.11, "Noise and Vibration," and Section 3.13, "Transportation and Circulation," of the Draft EIR include analyses related to these topics. Specifically, Impact 3.11-4 evaluates the potential trip redistribution that would result from the completion of Spruce Avenue. For the purpose of the Draft EIR analysis, it is assumed that the residential development north of West Spruce Avenue between North Hayes Avenue and North Sandrini Avenue (approximately 155 single family homes) would be the primary source of traffic on the roadway. This is conservative because the West Spruce Avenue extension would not provide the shortest or most direct route for trips headed south or east from the existing residential development. The proposed roadway segment could be used by cut through traffic during peak travel times when roadway facilities along West Herndon Avenue in the vicinity of the project site are experiencing increases in delay, but use of the roadway by nonresidents is not anticipated to be a major source of traffic due to the location of the road relative to other regional attractants and thoroughfares.

The comment also expresses concerns related to air quality associated with idling cars at the gas station and car wash. Section 3.3, "Air Quality," of the Draft EIR includes an analysis related to these topics. As explained therein, the City quantified the emissions from the permitted gas station based on anticipated throughput and included these emissions in the calculations of maximum annual emissions of criteria pollutants and precursors associated with operation of the project (see Table 3.3-6). The project would not generate operational emissions of criteria air pollutants and ozone precursors exceeding SJVAPCD's annual mass emissions thresholds of significance or daily screening criteria for permitted and non-permitted sources.

The comment also expresses concerns related to wildlife and an existing ponding basin. Section 3.5, "Biological Resources," of the Draft EIR includes a discussion of the proposed project's impacts related to wildlife. As noted on

page 3.5-12, the project site does not contain wetlands and does not provide an important connection between any areas of natural habitat outside of the project site. The referenced ponding basin may be the stormwater basin located northwest of the project site (Fresno Metropolitan Flood Control District's Basin EG). This basin captures stormwater runoff from the developed area east of North Arthur Avenue for groundwater recharge or release of the settled water into the San Joaquin River. As discussed on pages 3.15-13 through 3.5-16, three special-status wildlife species (burrowing owl, Swainson's hawk, and white-tailed kite) and protected common native nesting birds have potential to occur on the project site; however, mitigation measures would be implemented to reduce potential impacts to these wildlife species from project implementation to a less-than-significant level.

This comment does not offer any specific concern related to the adequacy of the Draft EIR; therefore, no revisions to the Draft EIR are necessary in response to this comment. The comment is included in the record, which will be considered by the decision makers in their deliberations over potential approval of the proposed project.

**Letter I16**

**From:** Jeannette Correa
**To:** Jose Valenzuela
**Subject:** Costco
**Date:** Sunday, July 16, 2023 12:50:14 PM

External Email: Use caution with links and attachments

Hello my name is Jeannette my Concern of Relocating Costco to Herndon is the traffic. We already have lots of traffic Evenings. My son Attends Rio vista and there is major traffic after school. Bullard turns into riverside and the street turns into one lane and its major traffic. Please don't relocate Costco to Herndon. Please take your time to drive on Herndon and 99 turning rush hour and drive down riverside Which turns into Bullard after kids get out of school around 3:00pm. Thank you for your time. Sincerely jeannnette correa

I16-1

## Letter I16 Jeannette Correa

July 16, 2023

Response I16-1

The comment expresses concerns related to traffic. Although the topic of traffic congestion is a factor for consideration by the decision-makers in acting on the proposed project, pursuant to CCR Section 15064.3, automobile delay and similar metrics relating to vehicular roadway capacity and traffic congestion are not considered a significant impact on the environment under CEQA. Please refer to Response I4-1 for a discussion regarding the proposed project's impacts related to transportation.

This comment does not offer any specific concern related to the adequacy of the Draft EIR; therefore, no revisions to the Draft EIR are necessary in response to this comment. The comment is included in the record, which will be considered by the decision makers in their deliberations over potential approval of the proposed project.

Letter I17

**From:** Dantenello Velasquez
**To:** Jose Valenzuela
**Subject:** New Costco development
**Date:** Saturday, July 15, 2023 8:42:22 PM

**External Email:** Use caution with links and attachments

Dear Mr. Valenzuela,

I am a resident of the neighborhoods located next to the proposed location for the new Costco. I understand the idea of more gas pumps and larger store, would be appealing for many Costco shoppers but as a person living in this immediate area, I see no upsides for I or my neighbors. The traffic from the shopping center alone has made it extremely difficult and brought quite a few transients to the area. I feel that Costco will only add to both of these problems. I also worry for the long standing Riverside gold course. I can't imagine people who golf there would like their current scenery to change to the back of a building. I hope that my concerns are wrong if this does go through. I17-1

Respectfully,
Dantenello Velasquez

## Letter I17 Dantenello Velasquez

July 15, 2023

Response I17-1

The comment expresses concerns related to traffic and the presence of transients. This comment is similar to Comments I4-1 and I4-2. Please refer to Response I4-1 for a discussion regarding the proposed project's impacts related to transportation and Response I4-2 for a discussion of unhoused populations.

The comment also expresses concerns related to views from the Riverside Golf Course. Section 3.1, "Aesthetics," of the Draft EIR includes a discussion of the proposed project's impacts related to public views. As described on page 3.1-4 of the Draft EIR, landscaping on the golf course prevents direct line of sight to the project site and existing fencing and netting along North Riverside Drive create visual separation. Page 3.1-8 of the Draft EIR states that the project would reduce the vacant land visible from vantage points on the golf course, but would not substantially degrade the existing visual quality and would be consistent with the visual character of the existing development in the vicinity of the project site. The Draft EIR concludes that the impact on public views would be less than significant.

This comment does not offer any specific concern related to the adequacy of the Draft EIR; therefore, no revisions to the Draft EIR are necessary in response to this comment. The comment is included in the record, which will be considered by the decision makers in their deliberations over potential approval of the proposed project.

Letter I18

**From:** Randy Ames
**To:** Jose Valenzuela
**Subject:** Costco on Herndon Avenue
**Date:** Saturday, July 15, 2023 4:14:00 PM

**External Email:** Use caution with links and attachments

Mr. Valenzuela,

I am against this location for Costco for one reason only and that is the amount of traffic that will increase on Herndon Avenue which does not have the capacity in it's current configuration. While early rush hour will not be impacted too much (although I wonder about that with all the pumps they are putting in) The afternoon and evening traffic is already horrendous. There are times when coming off the 99 to make a turn from the offramp to Herndon that you are backed up way beyond the end of the left turn bulb. Why the city has not made the railroad go overhead or under grade at that location is confusing to say the least. When a train is there they block it many times longer than ordinace allows. All this with an additional 14,000 car trips in the area how is this possible unless there are major traffice separations and additional lanes. The new shopping center out there will only get more vehicular traffic as it gets built out. For those of us who use Herndon to head north out of Fresno this will be a bumper to bumper situation more that it is now. I18-1

I know Costco is a big stick but make them pay for the Herndon upgrades if this is going through. And no, we do not need another light for access to Costco so close to the existing light. I hope the city will be reasonable and look at all the concerns.

Regards,

Randy Ames

## Letter I18 Randy Ames

July 15, 2023

Response I18-1

The comment expresses opposition to the proposed project and concerns related to traffic, specifically related to operation of West Herndon Avenue and the existing railroad. This comment is similar to Comment I4-1. Please refer to Response I4-1 for a discussion regarding the proposed project's impacts related to transportation. Refer also to Section 3.13, "Transportation and Circulation," in the Draft EIR (Impact 3.13-3) that addresses potential queuing impacts along West Herndon. As described therein, the City has identified modification to the intersection of West Herndon Avenue and North Riverside Drive as conditions of approval for the proposed project. The Draft EIR also includes Mitigation Measure 3.13-3 to revise signal phasing to optimize green-time allocation relative to anticipated volumes at North Golden State Boulevard and West Herndon Avenue near the alignment of the existing railway and the California High Speed Rail.

The comment also offers the opinion that a new traffic light is not needed to provide access to the proposed Costco site. For clarification, there is an existing traffic light at the intersection of West Herndon Avenue and North Riverside

Avenue. No traffic lights are proposed along West Herndon Avenue. The project includes a general plan amendment to reclassify the portion of West Herndon Avenue between North Riverside Drive and North Hayes Avenue from expressway to superarterial to allow the construction of an intersection where West Herndon Avenue meets the private North Arthur Avenue right-of-way. Construction of the intersection of West Herndon Avenue and North Arthur Avenue to allow right-in/right-out and left-in turning would require a median cut on West Herndon Avenue.

This comment does not offer any specific concern related to the adequacy of the Draft EIR; therefore, no revisions to the Draft EIR are necessary in response to this comment. The comment is included in the record, which will be considered by the decision makers in their deliberations over potential approval of the proposed project.

Letter I19

**From:** Kiersten Winrow
**To:** Jose Valenzuela
**Subject:** New Costco PLEASE
**Date:** Friday, July 14, 2023 9:03:36 PM

External Email: Use caution with links and attachments

As someone who lives off Herndon and 99 I beg you to PLEASE say YES to the new location for Costco!!! The traffic concerns will be a non issue once the new exit it complete!! We NEED a different location. The one on Shaw and 99 is an absolute nightmare. The park lot was extremely poorly planned out and the traffic is so bad I19-1

Sent from my iPhone

## Letter I19 Kiersten Winrow

July 14, 2023

Response I19-1

The comment expresses support for the proposed project. This comment does not address the adequacy of the Draft EIR analysis; therefore, no further response is required. The comment is included in the record, which will be considered by the decision makers in their deliberations over potential approval of the proposed project.

Letter I20

**From:** AT&T ONLINE SERVICE josephpulido@att.net [undefined:josephpulido@att.net]
**To:** Jose Valenzuela
**Subject:** Costco"s new larger store Friday, July 14, 2023 8:08:38 PM
**Date:**

**External Email:** Use caution with links and attachments

I am writing in response to the Fresno Bee article dated Friday, July 14, 2023, reviewing the proposed Costco location on west Herndon Avenue. The article indicated the project would have to go through a long approval process to be finalized, but this seems untrue since the large area already has stacks in the ground outlining something and the entrance road off of Herndon Avenue has cones on the road. It seems the city will start working on the road soon. I was in the area today, so I decided to drive by and take a look. I TOTALLY DISAGREE this would be a good place to build this project at this location, since it is by Riverside Golf course and the housing development just west of the project. Herndon is already so busy it does not make sense to build this huge Costco off of Herndon due to the additional traffic and congestion this will cause. I am sure there will be traffic safety issues will occur when hundreds of shoppers go to Costco. I do not live in the area, but I do go to the golf course periodically and it is going to make it more difficult to get there. I am sure there are other lots close by to accommodate this project, but NOT right off of Herndon, this does not make sense. I20-1

Hopefully, you will take my concerns and NOT amend the city of Fresno's general plan and zoning. My husband thinks it is already going to happen and I should not bother to send this, but I am doing it anyway. I am a long time resident and at times I do not think over the years Fresno unfortunately has not reached its full potential, but I keep hoping.

## Letter I20 Joseph Pulido

July 14, 2023

Response I20-1

The comment expresses concern that the project activities have been initiated without the necessary project approvals. Any roadwork observed in the project vicinity is part of a separate action (mitigation for the El Paseo Shopping Center) that was subject to separate discretionary approval by the City. The project is currently undergoing environmental review and would not be allowed to undergo construction until the applicable permits and approvals listed on pages 2-21 through 2-22 of the Draft EIR are obtained.

The comment also expresses concerns about the project location, including proximity to adjacent recreational and residential land uses, rezoning, and traffic congestion and safety. Section 3.10, "Land Use and Planning," and Section 3.13, "Transportation and Circulation," of the Draft EIR include analyses related to these topics. This comment is similar to Comments I4-1 and I10-1. Please refer to Responses I4-1 for a discussion regarding the proposed project's impacts related to transportation and Response I10-1 for a discussion of the environmental effects that would result from the proposed changes to the general plan land use designations, zoning, and parking lot standards.

This comment does not offer any specific concern related to the adequacy of the Draft EIR; therefore, no revisions to the Draft EIR are necessary in response to this comment. The comment is included in the record, which will be considered by the decision makers in their deliberations over potential approval of the proposed project.

Letter I21

**From:** Jeremy Bruno
**To:** Jose Valenzuela
**Subject:** Herndon Costco
**Date:** Friday, July 14, 2023 6:41:29 PM

**External Email:** Use caution with links and attachments

The proposed new Costco location is a fabulous idea. It will relieve traffic on Shaw Ave. It will raise property values and spark growth in this area. You have my vote to proceed. I21-1

## Letter I21 Jeremy Bruno

July 14, 2023

Response I21-1

The comment expresses support for the proposed project. This comment does not address the adequacy of the Draft EIR analysis; therefore, no revisions to the Draft EIR are necessary in response to this comment. The comment is included in the record, which will be considered by the decision makers in their deliberations over potential approval of the proposed project.

Letter I22

**From:** bobeurich@aol.com
**To:** Jose Valenzuela
**Subject:** Costco...Herndon and Riverbend....
**Date:** Friday, July 14, 2023 4:56:43 PM

**External Email:** Use caution with links and attachments

BRING IT ON!!!!!!!! I22-1

Sent from AOL on Android

## Letter I22 Bob Eurich

July 14, 2023

Response I22-1

The comment expresses support for the proposed project. This comment does not address the adequacy of the Draft EIR analysis; therefore, no revisions to the Draft EIR are necessary in response to this comment. The comment is included in the record, which will be considered by the decision makers in their deliberations over potential approval of the proposed project.

Letter I23

**From:** Skd5858
**To:** Jose Valenzuela
**Subject:** Costco
**Date:** Friday, July 14, 2023 1:43:04 PM

External Email: Use caution with links and attachments

As a resident in the elderberry community my concern is the traffic on riverside and pollution. I would you to consider adding a barrier of trees so we don't see the Costco from the golf course and additional lanes added so we don't have a backup of traffic getting out of our homes. I23-1

Thank you,

Sukhi Dhillon
6753 w alluvial ave Fresno

S.D.-Sent from my iPhone

## Letter I23 Sukhi Dhillon

July 14, 2023

Response I23-1

The comment expresses concerns regarding traffic, pollution, and views from the Riverside Golf Course. Although the topic of traffic congestion is a factor for consideration by the decision-makers in acting on the proposed project, pursuant to CCR Section 15064.3, automobile delay and similar metrics relating to vehicular roadway capacity and traffic congestion are not considered a significant impact on the environment under CEQA. Please refer to Response I4-1 for a discussion regarding the proposed project's impacts related to transportation, and Response I5-1 for a discussion regarding the proposed project's impacts related to air quality.

The comment also expresses concerns related to views from the Riverside Golf Course. Section 3.1, "Aesthetics," of the Draft EIR includes a discussion of the proposed project's impacts related to public views. As described on page 3.1-4 of the Draft EIR, landscaping on the golf course prevents direct line of sight to the project site and existing fencing and netting along North Riverside Drive create visual separation. Page 3.1-8 of the Draft EIR states that the project would reduce the vacant land visible from vantage points on the golf course, but would not substantially degrade the existing visual quality and would be consistent with the visual character of the existing development in the vicinity of the project site. The preliminary landscape plans include trees throughout the site, including along the extension of West Spruce Avenue, which would create a visual barrier between the golf course and the proposed development. The Draft EIR concludes that the impact on public views would be less than significant.

This comment does not offer any specific concern related to the adequacy of the Draft EIR; therefore, no revisions to the Draft EIR are necessary in response to this comment. The comment is included in the record, which will be considered by the decision makers in their deliberations over potential approval of the proposed project.

Letter I24

**From:** Sakit Bibra
**To:** Jose Valenzuela
**Subject:** Costco store
**Date:** Friday, July 14, 2023 9:53:57 AM

External Email: Use caution with links and attachments

I live by and I dnt want around my house cosco it will be worse around my area once Costco came so I dnt want around my house thanks I24-1

Sent from my iPhone

## Letter I24 Sakit Bibra

July 14, 2023

Response I24-1

The comment expresses opposition to the proposed project but does not raise any specific issues related to the physical environment or address the adequacy of the Draft EIR analysis; therefore, no revisions to the Draft EIR are necessary in response to this comment. The comment is included in the record, which will be considered by the decision makers in their deliberations over potential approval of the proposed project.

Letter I25

**From:** Anya Ellis
**To:** Jose Valenzuela
**Subject:** New Fresno Wearhouse
**Date:** Friday, July 14, 2023 9:32:48 AM

**External Email:** Use caution with links and attachments

Good Morning,

My name is Anya Ellis, and I am with GV Wire. I saw that the new Costco that is going in by 99 is over 241,342 square feet. I was wondering if this number pertains to the whole complex or the facility itself. I25-1

Thank you,
Anya Ellis

## Letter I25 Anya Ellis

July 14, 2023

Response I25-1

The comment requests clarification regarding the project size. The overall project site encompasses 22 acres. As revised, the footprint of the warehouse retail building would be 219,126 square feet; however, the total retail area would only occupy 140,048 square feet and the remaining space would primarily be used for Costco loading, storage, and receiving operations. An additional 12,885 square feet would be developed with fuel canopy and 4,800 square feet would be developed with a car wash. This comment does not address the adequacy of the Draft EIR analysis; therefore, no revisions to the Draft EIR are necessary in response to this comment.

Letter I26

**From:** J. Paine
**To:** Jose Valenzuela
**Subject:** COSTCO project
**Date:** Friday, July 14, 2023 8:49:14 AM

**External Email:** Use caution with links and attachments

We live in the Elderberry Subdivision, on N. Kymber Drive, Fresno, Calif.
We ***DO NOT*** want the Costco built near our subdivision. The traffic is already a HUGE mess. People already run the red lights trying to get through the Target shopping center intersection. We deal with the trains, Golden state traffic, the High speed rail project, golf course, Hwy 99 on and off ramps, and now the Veteran's blvd connection. PLEASE!!! We do not need any more congestion trying to get into our homes. The work traffic and weekend traffic is a mess. When the trains are closing the Golden state intersection, it causes massive traffic back ups, to the point, traffic backs up into the Herndon/Riverside intersection. PLEASE DO NOT ADD TO THE MISERY!!
THis Costoco proposal will only cause MORE traffic accidents near our homes. ENOUGH!! I26-1

Thank you
Michael and Joan Paine
7368 North Kymber Drive
Fresno, Ca. 93722

## Letter I26 Michael and Joan Paine

July 14, 2023

Response I26-1

The comment expresses opposition to the proposed project and raises concerns related to traffic conditions, including congestion, violations, and accidents. Although the topic of traffic congestion is a factor for consideration by the decision-makers in acting on the proposed project, pursuant to CCR Section 15064.3, automobile delay and similar metrics relating to vehicular roadway capacity and traffic congestion are not considered a significant impact on the environment under CEQA. Please refer to Response I4-1 for a general discussion regarding the proposed project's impacts related to transportation and Response I18-1 for additional detail related to traffic on West Herndon Avenue. This comment does not offer any specific concern related to the adequacy of the Draft EIR; therefore, no revisions to the Draft EIR are necessary in response to this comment. The comment is included in the record, which will be considered by the decision makers in their deliberations over potential approval of the proposed project.

Letter I27

**From:** Bekah Wilson
**To:** Jose Valenzuela
**Subject:** Costco - Fresno
**Date:** Friday, July 14, 2023 7:46:58 AM

**External Email:** Use caution with links and attachments

Good morning Jose,

I am writing to you in regards to the new Costco plans on Herndon and Riverside. While I'm sure you would be expanding the road to three lanes instead of two, traffic is already horrendous in this area at peak hours, especially with the train. That can block traffic for miles alone let alone adding in a busy Costco. This already happens at the Shaw one as well with the train and people trying to get out of the Costco parking lot. Please reconsider these plans. I27-1

Thank you for your time,
--
Bekah Bryant
Medical Billing Technologies, Inc.
559.960.7819

## Letter I27 Bekah Bryant

July 14, 2023

Response I27-1

The comment expresses concerns related to existing and future traffic conditions. Although the topic of traffic congestion is a factor for consideration by the decision-makers in acting on the proposed project, pursuant to CCR Section 15064.3, automobile delay and similar metrics relating to vehicular roadway capacity and traffic congestion are not considered a significant impact on the environment under CEQA. Please refer to Response I4-1 for a discussion regarding the proposed project's impacts related to transportation and Response I18-1 for additional detail related to traffic on West Herndon Avenue. This comment does not offer any specific concern related to the adequacy of the Draft EIR; therefore, no revisions to the Draft EIR are necessary in response to this comment. The comment is included in the record, which will be considered by the decision makers in their deliberations over potential approval of the proposed project.

Letter I28

**From:** Randy Mills
**To:** Jose Valenzuela
**Subject:** New Costco
**Date:** Thursday, July 13, 2023 11:05:29 PM

**External Email:** Use caution with links and attachments

I for one am looking forward to the new Costco on Herndon. Soon the new veterans drive will open up and normal Herndon traffic will be moved to this, reducing congestion in the area of the new Costco. The current Costco is too small for our area, and definitely not enough gas pumps. I28-1

Definitely looking forward to the new Costco.

Randy Mills
6674 N Brunswick Ave, Fresno, CA 93722

## Letter I28 Randy Mills

July 13, 2023

Response I28-1

The comment expresses support for the proposed project. This comment does not address the adequacy of the Draft EIR analysis; therefore, no revisions to the Draft EIR are necessary in response to this comment. The comment is included in the record, which will be considered by the decision makers in their deliberations over potential approval of the proposed project.

Letter I29

**From:** Wkent1954
**To:** Jose Valenzuela
**Subject:** New proposed Costco being built on Riverside drive
**Date:** Thursday, July 13, 2023 6:13:01 PM

**External Email:** Use caution with links and attachments

I think this is a great idea. It is in the perfect place to help draw people to the Market Place at El Paseo which is nearby. We need Costco in this area as a win-win situation for everyone. Also, the old Costo parking places are taken up in large part by Winco. Both stores would benefit by moving the new Costco to El Paso Drive. I29-1

Good luck,

William Hardaway
and Melody Hardaway

## Letter I29 William and Melody Hardaway

July 13, 2023

Response I29-1

The comment expresses support for the proposed project. This comment does not address the adequacy of the Draft EIR analysis; therefore, no revisions to the Draft EIR are necessary in response to this comment. The comment is included in the record, which will be considered by the decision makers in their deliberations over potential approval of the proposed project.

Letter I30

**From:** Geoff J
**To:** Jose Valenzuela
**Subject:** No to Costco in NW Fresno
**Date:** Thursday, July 13, 2023 4:39:28 PM

**External Email:** Use caution with links and attachments

I am writing in preposition to the plans for a Costco in NW Fresno.

- The area is already heavily congested with traffic.
- The area is not zoned for this type of business
- The site will cause additional trash and pollution that is not needed that close to the river.
- Residents will be impacted by the additional lights, noise and activity in an otherwise quiet tranquil neighborhood.

I30-1

Geoff

## Letter I30 Geoff J.

July 13, 2023

Response I30-1

The comment expresses opposition to the proposed project and raises concerns related to several topics addressed below.

The comment expresses concerns related to traffic congestion. This comment is similar to Comment I4-1. Please refer to Responses I4-1 for a discussion regarding the proposed project's impacts related to transportation.

The comment expresses concerns related to zoning conflicts. Section 3.10, "Land Use and Planning," of the Draft EIR includes an analysis related to this topic. This comment is similar to Comment I10-1. Please refer to Response I10-1 for a discussion of the environmental effects that would result from the proposed changes to the general plan land use designations, zoning and parking lot standards.

The comment expresses concerns related to trash and pollution near waterways. Section 3.9, "Hydrology and Water Quality," of the Draft EIR includes a discussion of the proposed project's impacts related to water quality. As discussed on pages 3.9-8 and 3.9-9 of the Draft EIR (Impact 3.9-1), project construction and operation would be subject to various regulations, including the National Pollutant Discharge Elimination System Permit Program; underground storage tank regulations contained in CCR, Title 23, Water, Division 3, Chapter 16; Central Valley Regional Water Quality Control Board's General Permit for stormwater discharges from municipal separate storm sewer systems (Order R5-2016-0040); and Fresno Metropolitan Flood Control District's (FMFCD's) Storm Drainage and Flood Control Master Plan. Best management practices would be implemented during project construction and incorporated into the project design to ensure that the project would not degrade water quality. The Draft EIR concluded that the project's impact on water quality would be less than significant.

The comment expresses concerns related to lighting at nearby residential neighborhoods. Section 3.1, "Aesthetics," of the Draft EIR includes a discussion of the proposed project's impacts related to lighting. As discussed on page 3.1-9 (Impact 3.1-2), all light fixtures would be downcast and would not exceed the City's 0.5-foot-candle[1] standard for light

[1] A foot-candle is defined as one lumen per square foot.

spillover onto adjacent residential areas. The Draft EIR concluded that the project's impact related to lighting would be less than significant.

The comment expresses concerns related to noise at nearby residential neighborhoods. Section 3.11, "Noise and Vibration," of the Draft EIR includes a discussion of the proposed project's impacts related to noise. As discussed on pages 3.11-22 through 3.11-29, the proposed project would result in permanent new noise sources from stationary equipment and on-site activities, traffic, and truck trips; however, the Draft EIR concluded that these impacts would be less than significant or less than significant with mitigation incorporated (Impacts 3.11-4 and 3.11-5). As discussed on pages 3.11-16 through 3.11-20, project construction activities may be required during evening and nighttime hours and the Draft EIR concluded that this impact would remain significant and unavoidable, even with implementation of mitigation (Impact 3.11-1). As discussed in Response I4-1, CEQA does not preclude a public agency from approving or carrying out a project that has potential to result in significant and unavoidable impacts on the environment; however, the public agency must make findings for each impact and issue a statement of overriding considerations in order to approve the project.

This comment does not offer any specific concern related to the adequacy of the Draft EIR; therefore, no revisions to the Draft EIR are necessary in response to this comment. The comment is included in the record, which will be considered by the decision makers in their deliberations over potential approval of the proposed project.

Letter I31

**From:** Birdevinder
**To:** Jose Valenzuela
**Subject:** Costco comments
**Date:** Thursday, July 13, 2023 3:45:40 PM

**External Email:** Use caution with links and attachments

Hello, I am writing to oppose the Costco store on the Herndon exit. It will increase traffic and will raise lots of safety concerns. Why can't we leave where Costco is, as it is also near the other major grocery stores? People have convenience on Shaw Ave. Also, this side is growing with excellent businesses, which is becoming eye-catching to the tourists on the freeway. However, the river park is losing value, so they want to shift the Costco store here to eliminate the posh area aspect from this side of the town. People would move to Clovis if there is heavy traffic on every exit on freeway. I31-1

## Letter I31 Birdevinder

July 13, 2023

Response I31-1

The comment expresses general concerns related to traffic and safety. Please refer to Response I4-1 for a discussion regarding the proposed project's impacts related to transportation. As explained in Section 2.2.1 of the Draft EIR, Costco has proposed the store location because the customer base has outgrown the capacity of the current facility, which opened in 1985. The project would allow Costco to expand services in the area to include an additional gas station and a car wash, as well as a loading area to facilitate delivery of purchases directly to homes in the Fresno area. This comment does not offer any specific concern related to the adequacy of the Draft EIR; therefore, no revisions to the Draft EIR are necessary in response to this comment. The comment is included in the record, which will be considered by the decision makers in their deliberations over potential approval of the proposed project.

Letter I32

**From:** Bryan Miller
**To:** Jose Valenzuela
**Subject:** New Costco plan idea
**Date:** Thursday, July 13, 2023 2:23:31 PM

**External Email:** Use caution with links and attachments

Hello Jose,
I am really excited about the possibility of having a nice new Costco in Northwest Fresno. The one on Shaw is a little run down. I have some ideas about possibly helping with the entrance. I do not live near there and I am not a professional site planner. These are just my 2 cents. Take them or leave them, up to you.

The proposed building should be turned and shifted to the south west corner of the lot. Instead of using Riverside drive as the entrance, use the "private drive". However, make the entrance to the parking lot in the northeast corner. Tree/shrub lined sidewalk the entire length of that space so cars have to go all the way to the end. That will give any Herndon congestion some breathing room as the entering and exiting vehicle will have to traverse the whole length of the property before entering. This would pull traffic off of Herndon, an already busy throughway. I32-1

Hope this helps in your plans and we can get this up and running soon.

Thank you for your time

Bryan Miller

## Letter I32 Bryan Miller

July 13, 2023

Response I32-1

The comment expresses support for the proposed project and provides suggestions related to site access. Pages 2-13 through 2-14 of the Draft EIR provide a description of the proposed access points to the project site. This comment does not address the adequacy of the Draft EIR analysis; therefore, no revisions to the Draft EIR are necessary in response to this comment. The comment is included in the record, which will be considered by the decision makers in their deliberations over potential approval of the proposed project.

Letter I33

**From:** Colton Metzler
**To:** Jose Valenzuela
**Subject:** New Costco Construction
**Date:** Thursday, July 13, 2023 1:29:36 PM

**External Email:** Use caution with links and attachments

I wanted to weigh in and say that I support the new Costco construction. At a time when prices are so high, having a cheaper gas station to go to, and be able to save money by buying in bulk, is important to my family. The current costco is also in a bad neighborhood, and my family has been acosted by random homeless people on multiple occasions, making ym wife feel unsafe with our children. The current costco parking lot is also small and difficult to leave with the amount of traffic that piles up on shaw and golden state. The Costco on herndon and blackstone is much better in terms of parking, safety, and it has more gas pumps, preventing cars from ideling for so long. I33-1

I think this is a big win for consumers in Fresno, especially if Costco continues to run its current gas station on shaw, while also opening a larger one on herndon.

## Letter I33 Colton Metzler

July 13, 2023

Response I33-1

The comment expresses support for the proposed project. This comment does not address the adequacy of the Draft EIR analysis; therefore, no revisions to the Draft EIR are necessary in response to this comment. The comment is included in the record, which will be considered by the decision makers in their deliberations over potential approval of the proposed project.

Letter I34

**From:** Ty Murphy
**To:** Jose Valenzuela
**Subject:** proposed new Costco project
**Date:** Thursday, July 13, 2023 11:50:38 AM

**External Email:** Use caution with links and attachments

Hello,

I saw an article today that said the public can now comment on the proposed Costco project on Herndon Ave. in NW Fresno, so I figured I would provide my comments.

One thing that I have not seen mentioned in the numerous articles I have read about this project has to do with the Riverside Golf Course, which is located adjacent to the proposed location. Since the pandemic, public golf courses have become exponentially more busy in light of the huge increase in people that decided to either take up golf as a pastime or returned to it. The impact that this increase has had has resulted in heavily congested golf courses. And the Riverside Golf Course is a prime example of that. If you look at the course's parking lot during the day on most weekends, you will see that it is often so crowded, that few, if any, parking spaces are even available. So, I can only imagine that the increase in traffic to this area if the Costco project goes through will be felt not just by residents in the neighborhood, but also the many people showing up in the area to play golf. I34-1

Also, and this cannot be understated, the proposed location could cause the golf course to be forced to redesign the southern portion of the course on the boundary line. Currently, that south boundary only has a short fence and a bank of trees on the edge of the course. However, the construction of this Costco would require a significant change in that border. Obviously, at a minimum, a large fence or netting of some sort would have to be erected in order to shield cars from errant golf shots. But, it is also possible that the proposed extension of the street on that property might actually necessitate the redesign of that section of the course. Such a redesign, in addition to a fence or netting, requires a huge expense and substantial down time for that portion of the course while changes would be made. Clearly, these expenses would be passed down to the golfing community, likely resulting in an increase in fees. The Riverside Golf Course hosts the Fresno City Amateur Championship every spring, and is one of the oldest historical Amateur Golf Tournaments in the State. It is concerning that the southern boundary of the course could be compromised significantly. Also, depending on the timing of construction, it is possible that this annual tournament could be negatively affected if part of the course had to be shut down during the process. I34-2

I realize that these concerns pale in comparison to those of local residents who will have to deal with increased traffic congestion. But, I wanted to make sure you understood that there are other concerns which are not being publicized sufficiently, and the impact to the golf course is one of them that will affect thousands of area golfers.

Thank you,
Ty Murphy
tymmurphy1@gmail.com

# Letter I34 Ty Murphy

July 13, 2023

Response I34-1

The comment expresses concerns that nearby residents and recreationists at the Riverside Golf Course will experience increased traffic from the project. Please refer to Response I4-1 for a discussion regarding the proposed project's impacts related to transportation. Additionally, as discussed on page 3.12-4 of the Draft EIR, the project would not preclude access to existing recreational facilities, including the Riverside Golf Course. Rather, as noted on page 3.13-11 of the Draft EIR, the proposed intersection at West Herndon Avenue/North Arthur Avenue may result in easier travel for southbound drivers along North Riverside Drive, including nearby residents and visitors to the Riverside Golf Course. This comment does not offer any specific concern related to the adequacy of the Draft EIR; therefore, no revisions to the Draft EIR are necessary in response to this comment. The comment is included in the record, which will be considered by the decision makers in their deliberations over potential approval of the proposed project.

Response I34-2

The comment states that modifications to the golf course would be required to accommodate the project and expresses concern that these improvements would increase fees and interfere with events at the golf course. Page 3.12-4 of the Draft EIR describes the modifications to the Riverside Golf Course, which include modifications to the existing irrigation system, relocation of the golf cart path, and installation of a new fence and nets. The project applicant would be responsible for implementing and funding these improvements. These minor modifications would be implemented in coordination with the City to ensure that construction activities do not interfere with the use of the golf course. The environmental impacts from these improvements have been evaluated in the Draft EIR. This comment does not offer any specific concern related to the adequacy of the Draft EIR; therefore, no revisions to the Draft EIR are necessary in response to this comment. The comment is included in the record, which will be considered by the decision makers in their deliberations over potential approval of the proposed project.

Letter I35

**From:** Jax Ward
**To:** Jose Valenzuela
**Subject:** Proposed new Costco
**Date:** Thursday, July 13, 2023 11:42:01 AM

**External Email:** Use caution with links and attachments

Hi!

I just wanted to put in a word to make sure that there are safe -- and preferably separated -- ways for people to get to the proposed Costco that are NOT in cars.

I'm a cyclist. I commute daily by bike and do 95% of my errands by bike. I currently bike to the Costco in Fresno about once a week.

The biggest issue I often face is the lack of bike lanes, especially safe bike lanes (more than just a painted line). There's also a lack of bike parking (but I suspect that's not an issue you deal with).

If I understand it correclty, there's also a school nearby. Making sure we have safe ways for kids to get to schools -- especially kids who walk, bike, skateboard, etc, should be a priority when it comes to transportation management.

Please, keep all forms of transportation in mind. I know I risk my life everyday by biking in Fresno traffic but I also know it can get better.

I choose to bike. My husband and I do own two cars, but biking is my preferred way to get from place to place. And I tend to spend more money at merchants on my bike route, just in smaller but more frequent doses.

I35-1

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=======
Jax Ward
Chief Squirrel and Owner
Crazy Squirrel Game Store
Fresno, Calif.

## Letter I35 Jax Ward

July 13, 2023

Response I35-1

This comment states that there is a lack of safe bike lanes and bike parking. The comment also requests that the project consider alternate forms of transportation, including safe routes to schools. This comment is similar to Comment I8-1. Please refer to Response I8-1, above. As explained further in Response I5-1, pedestrian mobility in the vicinity may be improved through development of the project and the Draft EIR concludes that the proposed project would not conflict with planned pedestrian facilities. Further, the City of Fresno has met with the Central Unified School District regarding the proposed project to ensure that project-related truck deliveries do not pose a safety hazard for students at school bus drop-off/pick-up locations. This comment does not address the adequacy of the Draft EIR analysis; therefore, no revisions to the Draft EIR are necessary in response to this comment. The comment is included in the record, which will be considered by the decision makers in their deliberations over potential approval of the proposed project.

Letter I36

**From:** Elizabeth Mendoza
**To:** Jose Valenzuela
**Subject:** Costco proposal
**Date:** Thursday, July 13, 2023 10:24:22 AM

**External Email:** Use caution with links and attachments

I'm writing to you as a resident of the neighborhood that will be impacted by the new Costco proposal. Routing traffic down Spruce which is a residential neighborhood, not a city street will impact every resident living in that area. Not to mention it passes by an Assisted Living Facility. We purchased our home due to the quiet neighborhood and the noise, traffic, and environmental impact to the neighborhood would be unwelcome and a hazard to all the kids walking to the school bus stops on Spruce. I36-1

Thank you,

**Elizabeth Mendoza RN**
Associate Director for Quality Assurance
Central California Asthma Collaborative
**Office**: (559) 272-4874 **Direct**: (559) 420-1620
**Email:** elizabeth.mendoza@centralcalasthma.org
**Address:** 1939 N. Gateway Blvd, Suite 102 | Fresno, CA 93727
**Website:** www.CentralCalAsthma.org

## Letter I36 Elizabeth Mendoza

July 13, 2023

Response I36-1

The comment expresses concerns related to the noise, traffic, and safety hazards that would result from the proposed project. Section 3.11, "Noise and Vibration," and Section 3.13, "Transportation and Circulation," of the Draft EIR include analyses related to these topics. Refer to Response I15-1 for information about the extension of Spruce Avenue adjacent to the northern boundary of the project and anticipated effects on traffic patterns.

Please also refer to Response I4-1 for a discussion regarding the proposed project's impacts related to transportation and safety and Response I30-1 for a discussion regarding the project's impact related to noise.

This comment does not offer any specific concern related to the adequacy of the Draft EIR; therefore, no revisions to the Draft EIR are necessary in response to this comment. The comment is included in the record, which will be considered by the decision makers in their deliberations over potential approval of the proposed project.

Letter I37

**From:** Jch
**To:** Jose Valenzuela
**Subject:** New Costco
**Date:** Thursday, July 13, 2023 10:19:37 AM

External Email: Use caution with links and attachments

Please reconsider the location for the new Costco.
The traffic will be horrible there.

A better place for it would be by the new flooring store. Next to Veterans Boulevard.
This location will not compromise the traffic on Herndon.

I37-1

Thank you.
Sent from my iPhone

## Letter I37 J. Chmielewski

July 13, 2023

Response I37-1

The comment expresses concerns related to traffic. Although the topic of traffic congestion is a factor for consideration by the decision-makers in acting on the proposed project, pursuant to CCR Section 15064.3, automobile delay and similar metrics relating to vehicular roadway capacity and traffic congestion are not considered a significant impact on the environment under CEQA. Please refer to Response I4-1 for further discussion. The comment also suggests an alternative location for the proposed project that could reduce traffic on Herndon Avenue, compared to the proposed site. As explained in Section 3.13, "Transportation and Circulation," of the Draft EIR, traffic generation is not considered an impact on the environment. Therefore, CEQA does not require the evaluation of alternatives to reduce perceived effects.

In accordance with State CEQA Guidelines Section 15126.6(a), the Draft EIR evaluates a range of reasonable alternatives to the proposed project. As discussed on pages 6-3 through 6-5 of the Draft EIR, the City considered off-site locations, but dismissed these alternatives from further analysis due to a variety of reasons including (but not limited to) likely infeasibility and because they would not clearly address the project's significant environmental effects.

The flooring store referenced in the comment is assumed to be the Floor & Décor on North Riverside Drive, northwest of Veterans Boulevard. One of the offsite alternatives considered in the Draft EIR is located on three undeveloped parcels of approximately 8 acres, 6 acres, and 9 acres that are zoned for light industrial use in the area west of North Riverside Drive and north of Veterans Boulevard. This appears to be the same location suggested by the commenter. See Chapter 6, "Alternatives," of the Draft EIR for further discussion of this alternative project site and reasons for dismissal.

Because this comment does not offer any specific concern related to the adequacy of the Draft EIR, no revisions to the Draft EIR are necessary in response to this comment. The comment is included in the record, which will be considered by the decision makers in their deliberations over potential approval of the proposed project.

Letter I38

**From:** Yamaguchi
**To:** Jose Valenzuela
**Subject:** Costco relocation at herndon and riverside
**Date:** Thursday, July 13, 2023 9:31:44 AM

External Email: Use caution with links and attachments

This location is already too busy as herndon is the only large east west roadway north of shaw but serves north of herndon to the river. No need to relocate a business that will gut the shaw ave area . By serving a few more people Costco will disturb the environment in two areas for a bit more profit. The city of fresno will gain a bit more taxes from costco but lose more from merchants and lower level of ecco system on shaw. I38-1

kent yamaguchi

## Letter I38 Kent Yamaguchi

July 13, 2023

Response I38-1

The comment expresses concerns related to traffic and general concerns related to the environment. The comment also expresses opposition to the proposed relocation. Although the topic of traffic congestion is a factor for consideration by the decision-makers in acting on the proposed project, pursuant to CCR Section 15064.3, automobile delay and similar metrics relating to vehicular roadway capacity and traffic congestion are not considered a significant impact on the environment under CEQA. Please refer to Response I4-1 for a discussion regarding the proposed project's impacts related to transportation and Appendix A for an evaluation of the potential for the project to contribute to urban decay. This comment does not offer any specific concern related to the adequacy of the Draft EIR; therefore, no revisions to the Draft EIR are necessary in response to this comment. The comment is included in the record, which will be considered by the decision makers in their deliberations over potential approval of the proposed project.

Letter I39

**From:** Nick Quisenberry
**To:** Jose Valenzuela
**Subject:** Proposed Costco on W Herndon Ave
**Date:** Thursday, July 13, 2023 9:29:33 AM

**External Email:** Use caution with links and attachments

Good morning Mr Valenzuela,

I am writing this email to voice my concern over the proposed Costco store near Herndon / Riverside. I live in the area and to say the new shopping center on Riverside has created a traffic / air quality nightmare would be an understatement. Adding a huge Costco complex to this intersection would be nothing short of catastrophic. From both a traffic and smog standpoint this would severely diminish my, my family's, and my neighbor's quality of life/lives.

Costco already has a thriving store on W Shaw Ave a mere 5 minute drive from the proposed Herndon location. This current store is located in a business district, which is a more fitting location for the types of issues noted above.

I39-1

Please think of the PEOPLE who live in this area, and do what's in your power to protect our quality of life.

Thank you for your time.

Nick Quisenberry
Proud NW Fresno resident

## Letter I39 Nick Quisenberry

July 13, 2023

Response I39-1

The comment expresses concerns related to traffic and air quality. Although the topic of traffic congestion is a factor for consideration by the decision-makers in acting on the proposed project, pursuant to CCR Section 15064.3, automobile delay and similar metrics relating to vehicular roadway capacity and traffic congestion are not considered a significant impact on the environment under CEQA. Please refer to Response I4-1 for a discussion regarding the proposed project's impacts related to transportation and Response I5-1 for a discussion regarding the proposed project's impacts related to air quality. The comment also suggests that continued operation of the existing Costco on Shaw Avenue would reduce these impacts. Please refer to the discussion of Alternative 1b: No Project Alternative – No Development in Chapter 6, "Alternatives," of the Draft EIR.

This comment does not offer any specific concern related to the adequacy of the Draft EIR; therefore, no revisions to the Draft EIR are necessary in response to this comment. The comment is included in the record, which will be considered by the decision makers in their deliberations over potential approval of the proposed project.

Letter I40

**From:** Don Marshall
**To:** Jose Valenzuela
**Subject:** New Costco NW Riverside/Herndon
**Date:** Thursday, July 13, 2023 9:19:19 AM

External Email: Use caution with links and attachments

Good morning Jose, we are for the new Costco going in, like anything there are pros and cons. It will add more jobs, and taxes for the City of Fresno. Through the grapevine by legitimate sources Madera County is getting a back up proposal if Fresno denies the Herndon/Riverside Dr location which Madera would rezone 99 and Ave 7 for a new Costco location which is right across the River a short distance from the proposed Fresno store. Fresno would lose out on all taxes and I mean all taxes that Madera would gain can't see Fresno shooting itself in the foot. Don Marshall I40-1

Sent from my iPad

## Letter I40 Don Marshall

July 13, 2023

Response I40-1

The comment expresses support for the proposed project, stating that it would result in economic benefits for the City. This comment does not address the adequacy of the Draft EIR analysis; therefore, no revisions to the Draft EIR are necessary in response to this comment. The comment is included in the record, which will be considered by the decision makers in their deliberations over potential approval of the proposed project.

Letter I41

**From:** jerry montejano
**To:** Jose Valenzuela
**Subject:** Costco
**Date:** Thursday, July 13, 2023 8:28:49 AM

External Email: Use caution with links and attachments

Good morning, building a Costco on Herndon will be great. Will help out the traffic problems. Costco has outgrown the property on Shaw. Thank you have a great day. I41-1

Sent from my iPad

## Letter I41 Jerry Montejano

July 13, 2023

Response I41-1

The comment expresses support for the proposed project, stating that it would alleviate traffic problems. This comment does not address the adequacy of the Draft EIR analysis; therefore, no revisions to the Draft EIR are necessary in response to this comment. The comment is included in the record, which will be considered by the decision makers in their deliberations over potential approval of the proposed project.

Letter I42

**From:** wpeverill@sebastiancorp.net
**To:** Jose Valenzuela
**Subject:** New Costco
**Date:** Friday, July 21, 2023 5:15:48 PM

External Email: Use caution with links and attachments

Would like to see report and make comments. Thanks I42-1
William Duane Peverill
Sent from my iPhone

## Letter I42 William Duane Peverill

July 21, 2023

Response I42-1

The comment is a request to review the Draft EIR and have an opportunity to make comments. In accordance with Section 15105 of the CEQA Guidelines, the Draft EIR was circulated for a 45-day public review period from July 11, 2023 to August 25, 2023. The Draft EIR was available for review by appointment at the Planning and Development Department at 2600 Fresno Street, Room 3043, Fresno, CA 93721. Electronic copies of the Draft EIR were available on request by contacting Jose Valenzuela via e-mail or by phone. The Draft EIR was also available for review on the City's website at the following link: https://www.fresno.gov/planning/plans-projects-under-review/#tab-14. The City provided the commenter with access to the Draft EIR, as requested, on July 24, 2023. This comment does not address the adequacy of the Draft EIR analysis; therefore, no revisions to the Draft EIR are necessary in response to this comment.

Letter I43

**From:** Lorraine Arrington
**To:** Jose Valenzuela
**Subject:** Costco new warehouse
**Date:** Friday, July 21, 2023 5:44:59 PM

**External Email:** Use caution with links and attachments

Please sir, don't let them come to this city, or Clovis. 3 Costcos are enough. We don't want to to put all our other choices for groceries out of business.

Why not open a huge farmers market with bread, cheese, produce and other things instead of mass produced products like what costco sells??

I43-1

Thank you,
Lorraine

## Letter I43 Lorraine Arrington

July 21, 2023

Response I43-1

The comment expresses opposition to the proposed project and raises concerns about local businesses. As discussed in Response I4-2, CEQA requires lead agencies to consider the effects of a proposed project on the physical environment. Comment I10-1 raises a similar issue pertaining to gas stations. Similar to the response provided for comment I10-1, the proposed project's economic effects on local grocery stores in the vicinity of the project site is not, in and of itself, a significant impact under CEQA.

An evaluation of the potential for the Costco relocation and gas station to result in urban decay impacts was conducted by ALH Urban and Regional Economics in 2023. This analysis indicates that food sales are strong in the City of Fresno. Further, because the Costco store is being relocated, it is anticipated that "existing Costco shoppers will transfer their purchases to the new store, such that diversions from existing area food stores will be at a minimum." The analysis concludes that "sales impacts are not likely to be high enough to contribute to closure of existing food stores" (see Appendix A).

Therefore, no revisions to the Draft EIR are necessary in response to this comment. The comment is included in the record, which will be considered by the decision makers in their deliberations over potential approval of the proposed project.

Letter I44

**From:** Dr. Danielle Biggs
**To:** Jose Valenzuela
**Subject:** NEW COSTCO
**Date:** Friday, July 21, 2023 5:55:59 PM

**External Email:** Use caution with links and attachments

I ***STRONGLY OPPOSE*** building such a large Costco! I bought a home to quietly retire in, instead I have ended up with 3 housing developments being built in a space meant for one, wildlife that whose habitats don't seem to be considered, as they are driven from their home and into my back yard, increased traffic, no sidewalks for kids walking to school, drag racing **AT LEAST 4-6 TIMES A WEEK**, a homeless population that hasn't been dealt with, not to mention being ***burglarized for the 4th time*** since I moved here! Now I am going to have to fight increased traffic for a store that isn't even accessible to ***ALL FRESNO*** residents due to membership cost?!? Instead of being the biggest Costco, why don't our reps look into why we are soon going to have to pay for free TV? I44-1

**Broadcasters to Encrypt ATSC 3.0 Signals - How it Impacts Free OTA TV)**

***Dr. Danielle Biggs***
***Licensed Psychologist***
***PSY 21701***

***3134 Willow Ave. Suite 103***
***Clovis, CA 93612***
***559-803-8847***
***Fax: 559-243-1533***

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*"I was put on this earth to accomplish a certain number of things. Right now I'm so far behind I will never die".*
*--Calvin and Hobbes*

As Kurt Vonnegut wrote, "And so it goes..."

"I've learned that people will forget what you said, people will forget what you did, but people will never forget how you made them feel."
--Maya Angelou

## Letter I44 Dr. Danielle Biggs

July 21, 2023

Response I44-1

The comment expresses opposition to the proposed project and raises concerns related to existing issues faced in the neighborhood. The comment also raises concerns about project-generated traffic. Although the topic of traffic congestion is a factor for consideration by the decision-makers in acting on the proposed project, pursuant to CCR Section 15064.3, automobile delay and similar metrics relating to vehicular roadway capacity and traffic congestion are not considered a significant impact on the environment under CEQA. Please refer to Response I4-1 for a discussion regarding the proposed project's impacts related to transportation. This comment does not offer any

specific concern related to the adequacy of the Draft EIR; therefore, no revisions to the Draft EIR are necessary in response to this comment. The comment is included in the record, which will be considered by the decision makers in their deliberations over potential approval of the proposed project.

Letter I45

**From:** Holden Markwith
**To:** Jose Valenzuela
**Subject:** New Costco
**Date:** Friday, July 21, 2023 6:57:17 PM

External Email: Use caution with links and attachments

Hello Jose,

I'm writing you about the new Costco being built near Herndon/99. I am a resident that lives in the neighborhood nearby at 7026 N Rumi Ave. I purchased this home in 2019. This neighborhood is already extremely hostile with traffic and lack of trees, lack of walkable spaces, and no nearby parks. Building a Costco here is a terrible idea. It's too close to homes and many schools. I really hope that you have the power to reconsider this decision as it will be harmful to your local community. If this can't be stopped please ask Costco to build a gate for our neighborhood. They should give back to our community if they are going to be changing things for the people that live here. I45-1

Thank you for you consideration,

Holden Markwith

559-284-2720

## Letter I45 Holden Markwith

July 21, 2023

Response I45-1

The comment expresses opposition to the proposed project and raises concerns related to existing issues faced in the neighborhood. The comment also raises concerns about the project's proximity to residences and schools, but does not identify any specific environmental issues and does not address the adequacy of the Draft EIR analysis; therefore, no revisions to the Draft EIR are necessary in response to this comment. The comment is included in the record, which will be considered by the decision makers in their deliberations over potential approval of the proposed project.

Letter I46

**From:** David Scott
**To:** Jose Valenzuela
**Subject:** Proposed Costco in Northwest Fresno
**Date:** Saturday, July 22, 2023 8:22:54 AM

External Email: Use caution with links and attachments

Dear Mr. Valenzuela:

I want to object to the plans to build a huge Costco business complex across Herndon Avenue from the Marketplace shopping center in northwest Fresno. Marketplace already draws a lot of traffic and Herndon avenue is currently too congested. I live near Herndon Avenue and have grown tired of the increased traffic noise and pollution. So I would like to have the new Costco located somewhere else, like on Highway 41 around the San Joaquin River. I46-1

Please register my objection to this project.

Sincerely,

David Scott
4131 W. Wathen Avenue
Fresno, CA 93722

## Letter I46 David Scott

July 22, 2023

Response I46-1

The comment expresses opposition to the proposed project and raises concerns related to traffic, noise, and pollution. Although the topic of traffic congestion is a factor for consideration by the decision-makers in acting on the proposed project, pursuant to CCR Section 15064.3, automobile delay and similar metrics relating to vehicular roadway capacity and traffic congestion are not considered a significant impact on the environment under CEQA. Please refer to Response I4-1 for a discussion regarding the proposed project's impacts related to transportation, Response I5-1 for a discussion regarding the proposed project's impacts related to air quality, and Response I30-1 for a discussion regarding the proposed project's impacts related to noise.

Finally, the comment indicates that there are other locations in the Fresno area that may be more appropriate for the proposed project. Specifically, the comment suggests a site along Highway 41 along the San Joaquin River. This location is approximately 10 miles east of the proposed project site and 2 miles north of the existing Costco at 7100 N Abby Street in Fresno. Please refer to Chapter 6, "Alternatives," in the Draft EIR, which provides a brief analysis of three potential site alternatives.

This comment does not offer any specific concern related to the adequacy of the Draft EIR; therefore, no revisions to the Draft EIR are necessary in response to this comment. The comment is included in the record, which will be considered by the decision makers in their deliberations over potential approval of the proposed project.

Letter I47

**From:** Amy Siliznoff
**To:** Jose Valenzuela
**Subject:** Comment Regarding Expanded Northwest Costco
**Date:** Saturday, July 22, 2023 8:29:09 AM

**External Email:** Use caution with links and attachments

Hi Jose,

I'm reaching out to provide comments regarding the expanded northwest Costco. If this project is implemented, traffic would be a concern for this area. The railroad traffic is already backed up, especially during morning hours around 8AM and afternoon hours around 5PM. If this project is implemented, an overpass over the railroad on herndon would need to be constructed, otherwise traffic will be 10x worse for this area. I47-1

Amy Siliznoff

## Letter I47 Amy Siliznoff

July 22, 2023

Response I47-1

The comment expresses concerns related to traffic. Although the topic of traffic congestion is a factor for consideration by the decision-makers in acting on the proposed project, pursuant to CCR Section 15064.3, automobile delay and similar metrics relating to vehicular roadway capacity and traffic congestion are not considered a significant impact on the environment under CEQA. Please refer to Response I4-1 for a discussion regarding the proposed project's impacts related to transportation and Response I18-1 for a response to concerns related to traffic and operation of the existing railroad. This comment does not offer any specific concern related to the adequacy of the Draft EIR; therefore, no revisions to the Draft EIR are necessary in response to this comment. The comment is included in the record, which will be considered by the decision makers in their deliberations over potential approval of the proposed project.

Letter I48

**From:** Betty Williams
**To:** Jose Valenzuela
**Subject:** New Costco on Riverside Drive
**Date:** Saturday, July 22, 2023 1:35:46 PM

**External Email:** Use caution with links and attachments

This area desperately need the larger store, we moved here 15 yrs ago & the traffic on Shaw is backed up to Polk trying to get to Costco. Everyone shop there for gas prescriptions & food. The new Costco would offer enough gas pumps & parking spaces that would solve a huge problem for all of us. My grandson go to Rio Vista Middle School , it's no where near the Costco site. I've never seen children walking to or from school in that area. Veterans Blvd will help with a lot of the traffic some are complaing about . They don't like change but it's too late we have new communities that's already built & more to come. We're proud residents that welcome the change & can hardly wait for it to open. We're waiting for the under pass on West Shaw & Golden State next

I48-1

Sent from Mail for Windows

## Letter I48 Betty Williams

July 22, 2023

Response I48-1

The comment expresses support for the proposed project. This comment does not address the adequacy of the Draft EIR analysis; therefore, no revisions to the Draft EIR are necessary in response to this comment. The comment is included in the record, which will be considered by the decision makers in their deliberations over potential approval of the proposed project.

Letter I49

**From:** Jensen Vang
**To:** Jose Valenzuela
**Subject:** North Fresno Costco Comment
**Date:** Saturday, July 22, 2023 5:57:00 PM

**External Email:** Use caution with links and attachments

Jose, my property on 6172 w Hudson Dr Fresno Ca 93722 will be impacted by Costco's new store. I do not support this plan as traffic is and was and has been difficult and congested. Adding the train when it makes is 1000x more congested, especially plus the large amount of traffic Costco brings will be a disaster. Please do not move forward with this plan. Costco deserves an open and wide area in the west to expand beyond its limits. Just not in Herndon. Bus and student safety will be jeopardized. School traffic on River middle school was already another problem that we were experiencing with congested traffic. This plan is a disaster. I49-1

Resident

Jensen 5593496943

## Letter I49 Jensen Vang

July 22, 2023

Response I49-1

The comment expresses concerns related to traffic and student safety. This comment is similar to Comments I4-1 and I5-1. Please refer to Responses I4-1 and I5-1 for a discussion regarding the proposed project's impacts related to transportation, including VMT and safety hazards. This comment does not offer any specific concern related to the adequacy of the Draft EIR; therefore, no revisions to the Draft EIR are necessary in response to this comment. The comment is included in the record, which will be considered by the decision makers in their deliberations over potential approval of the proposed project.

Letter I50

**From:** Melody Wolverton
**To:** Jose Valenzuela
**Subject:** Costco
**Date:** Saturday, July 22, 2023 7:52:46 PM

**External Email:** Use caution with links and attachments

I think this is a great idea, provided they employ first time Costco employees instead of moving and transferring existing employees to this new Costco. I would be supportive of that! I50-1
Thanks for your time
Melody Wolverton
Resident of 93722

## Letter I50 Melody Wolverton

July 22, 2023

Response I50-1

The comment expresses support for the proposed project. This comment does not address the adequacy of the Draft EIR analysis; therefore, no revisions to the Draft EIR are necessary in response to this comment. The comment is included in the record, which will be considered by the decision makers in their deliberations over potential approval of the proposed project.

Letter I51

**From:** AT&T ONLINE SERVICE
**To:** Jose Valenzuela
**Subject:** New Costco Project
**Date:** Saturday, July 22, 2023 9:07:44 PM

**External Email:** Use caution with links and attachments

It is too bad that the city of Fresno does not take its citizens concerns seriously. I have lived in Fresno basically all my life, went to local schools and am a graduate of Fresno State. My husband and I have traveled extensively and have seen what other communities have developed in their cities that make sense and again Fresno has great potential, but it seems we take one step forward and two steps back. I read the information you provided, but the Costco project that was noted in the Fresno Bee article stated it was a proposal and NOT final. Again, the information you sent sounds like it is going to happen no matter what the community wants. I am so happy that I do not live in the area, but again I thought I would share my thoughts with you. I hope everything goes well for the families who have children when they have to navigate through the additional traffic going and returning from school. My husband tells me it really does not concern us, but I thought I would send this anyway. I51-1

## Letter I51 Joseph Pulido

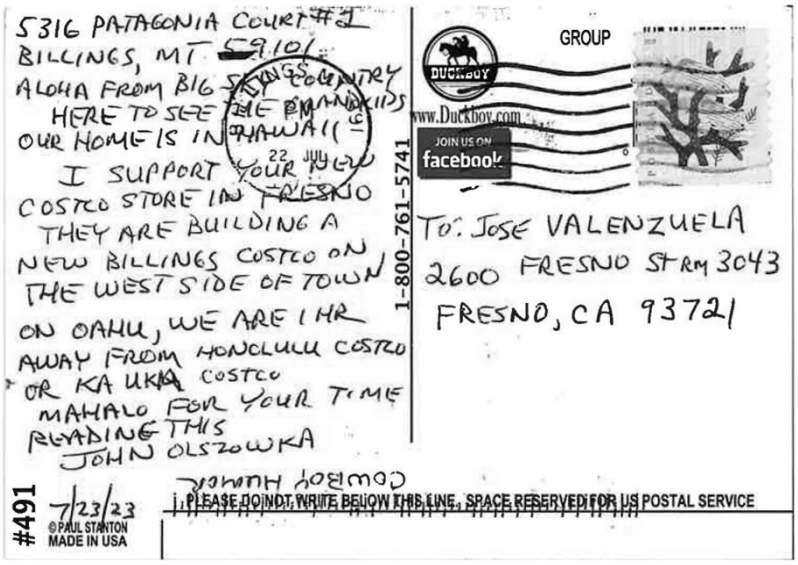
July 22, 2023

Response I51-1

The comment expresses concern that the proposal is final. As discussed on page 1.5 of the Draft EIR, the proposed project is currently undergoing environmental review. Before, adopting the project, the lead agency is required to certify that the EIR has been completed in compliance with CEQA, that the decision-making body reviewed and considered the information in the EIR, and that the EIR reflects the independent judgement of the lead agency. Other permits and approvals that may be required for project implementation are listed on pages 2-21 and 2-22 of the Draft EIR.

The comment also expresses concerns related to traffic and student safety. This comment is similar to Comments I4-1 and I5-1. Please refer to Responses I4-1 and I5-1 for a discussion regarding the proposed project's impacts related to transportation, including VMT and safety hazards. This comment does not offer any specific concern related to the adequacy of the Draft EIR; therefore, no revisions to the Draft EIR are necessary in response to this comment. The comment is included in the record, which will be considered by the decision makers in their deliberations over potential approval of the proposed project.

Letter I52




I52-1

## Letter I52 John Olszowka

July 23, 2023

Response I52-1

The comment expresses support for the proposed project. This comment does not address the adequacy of the Draft EIR analysis; therefore, no revisions to the Draft EIR are necessary in response to this comment. The comment is included in the record, which will be considered by the decision makers in their deliberations over potential approval of the proposed project.

Letter I53

**From:** asalama laka
**To:** Jose Valenzuela
**Subject:** Comment on proposed Costco
**Date:** Sunday, July 23, 2023 10:36:49 AM

**External Email:** Use caution with links and attachments

Hello

As a citizen who lives at 8680 North Glen avenue and regularly uses Herndon avenue to traverse the city, I am alarmed by the proposal that Fresno is attempting to ram through which would allow the world's biggest Costco to be built right next to another large business shopping development on Riverside drive..

Herndon avenue is slated to suffer the same fate as so many other parts of Fresno. When businesses pull up roots, move to a different part of town and leave the previous street. Abandoned to homelessness and crime and trash. That's what happened to Shields avenue and that's what you guys are in the process of doing to Shaw avenue.. I feel sorry for the homeowners off of those respective streets who watch their property values get hit by poor city planning..

Herndon avenue is one of the only ways to get from the east side of the city to the west side of the city and vice versa, especially given how bad Shaw avenue has become and now you are threatening to remove one of the only traffic arteries away. Just so you can cram a second Costco into Fresno when they already have a Costco and another one in Clovis. Not very far away. And what happens when Costco abandons the Riverside location and then moves slightly further north off highway 99???

I53-1

at a certain point in time, large companies need to be forced to stick with the locations that they selected and not just create more blight and sprawl..

Save our City and save Herndon. . Just developing every unused plot of land and ignoring all the city planning Mistakes that were made in the past is not a solution. It's just destroying the last good east-west corridor we have left.

Justin latham
2056141707

# Letter I53 Justin Latham

July 23, 2023

## Response I53-1

The comment expresses concern that the proposed project would cause local businesses in the area to close, resulting in increased presence of unhoused populations, crime, and trash and reduced property values. This comment is similar to Comment I10-1. Please refer to Response I10-1 for a discussion regarding the proposed project's impacts related to urban decay.

The comment also expresses concerns that the proposed project would remove Herndon Avenue. The proposed project would not result in the removal of any existing roadways. As discussed on page 2-6 of the Draft EIR, the proposed project includes a proposed General Plan amendment and rezoning to reclassify West Herndon Avenue from North Riverside Drive to North Hayes Avenue from an expressway to a superarterial. The reclassification would allow construction of a new intersection where West Herndon Avenue meets the private North Arthur right-of-way, which would allow access to the project site.

The comment also expresses concern that the proposed project would ultimately be abandoned and "create more blight and sprawl." The future closure of the proposed project is speculative, and the resulting potential for urban blight would not be considered a reasonably foreseeable indirect effect of the project.

Letter I54

**From:** Charles Ognibene
**To:** Jose Valenzuela
**Subject:** Costco Proposal
**Date:** Sunday, July 23, 2023 7:35:59 AM

**External Email:** Use caution with links and attachments

This is a request to review the proposal for the new Costco slated for Herndon and 99. Thanks I54-1

## Letter I54 Charles Ognibene

July 23, 2023

Response I54-1

The comment is a request to review the project proposal. This comment is similar to Comment I42-1. Please refer to Response I42-1 regarding circulation of the Draft EIR for the proposed project. The City provided the commenter with access to the Draft EIR, as requested. This comment does not address the adequacy of the Draft EIR analysis; therefore, no revisions to the Draft EIR are necessary in response to this comment.

Letter I55

**From:** Jamey Schmidt
**To:** Jose Valenzuela
**Subject:** Costco and Car Wash
**Date:** Monday, July 24, 2023 7:28:58 AM

**External Email:** Use caution with links and attachments

Jose,
Good morning!

I just read an article in the Chronicle regarding the Costco. I am concerned about the car wash. Where is the water coming from for that? I55-1

Thank you,
Jamey

## Letter I55 Jamey Schmidt

July 24, 203

Response I55-1

The comment expresses concern regarding the water source for the proposed car wash. As discussed on pages 3.9-10, 3.14-12, and 3.14-13 of the Draft EIR, the project, including the car wash, would be supplied water through the City of Fresno Department of Public Utilities. As explained in the Draft EIR (see page 2-13) wash water would be recycled. A description of the City's water supply sources is provided on pages 3.14-4 through 3.14-7 of the Draft EIR. The City's 2020 Urban Water Management Plan (UWMP) projects that the City would have an excess of water through 2045 during normal, dry, and multiple dry years. The project's water demand, which considers the water demand for the car wash, is accounted for within the City's 2020 UWMP projections for future development. The Draft EIR concludes that there would be sufficient water to serve the project and reasonably foreseeable development during normal, dry, and multiple dry years (see Impact 3.14-2, Draft EIR pages 3.14-12 and 3.14-13). This comment does not offer any specific concern related to the adequacy of the Draft EIR; therefore, no revisions to the Draft EIR are necessary in response to this comment.

Letter I56

**From:** wpeverill@sebastiancorp.net
**To:** Jose Valenzuela
**Subject:** Re: New Costco
**Date:** Monday, July 24, 2023 2:44:19 PM

**External Email:** Use caution with links and attachments

Thank you!
I think this would be a great move. The one on Shaw is causing more of a traffic situation than the proposed new location. I don't feel the new location will have any impact on the school kids and they're walking. Especially if the students follow the rules of the road. As a former educator at Central Unified for 33 years and Board of Trustees member I have seen the growth and feel this would be more of asset than a hindrance. The only thing I would like to see is the addition of Diesel pumps along with the gasoline. Only one Costco has diesel in the Fresno area. I56-1
Thanks again
William Duane Peverill

Sent from my iPhone

On Jul 24, 2023, at 1:41 PM, Jose Valenzuela <Jose.Valenzuela@fresno.gov> wrote:

Hello:

Thank you for reaching out. Your comments will be reviewed and included in the project record. For additional information on the proposed project, please visit our Plans and Projects Under Review webpage to download the Costco Commercial Center Draft Environmental Impact Report and associated studies.

Plans & Projects Under Review – City of Fresno

If you have further questions or comments, please let us know.

Thank you,

Jose Valenzuela | Supervising Planner
Current Planning | Planning & Development
2600 Fresno Street | Fresno CA 93721
559.621.8070
Jose.Valenzuela@Fresno.gov

Resources: Planning & Development | GIS Data Hub – Interactive Zoning Map | Fresno Municipal Code | Accela Citizens Access (ACA) Online Plans/Permits/Inspections | ACA Instruction Videos

-----Original Message-----
From: wpeverill@sebastiancorp.net <wpeverill@sebastiancorp.net> Sent: Friday, July 21, 2023 5:16 PM
To: Jose Valenzuela <Jose.Valenzuela@fresno.gov>
Subject: New Costco

External Email: Use caution with links and attachments

Would like to see report and make comments. Thanks William Duane Peverill Sent from my iPhone

## Letter I56 William Duane Peverill

July 24, 203

Response I56-1

The comment expresses support for the proposed project. This comment does not address the adequacy of the Draft EIR analysis; therefore, no revisions to the Draft EIR are necessary in response to this comment. The comment is included in the record, which will be considered by the decision makers in their deliberations over potential approval of the proposed project.

Letter I57

**From:** Lorraine Arrington
**To:** Jose Valenzuela
**Subject:** Re: Costco new warehouse
**Date:** Monday, July 24, 2023 4:32:37 PM

**External Email:** Use caution with links and attachments

Thank you for your response. I57-1

On Mon, Jul 24, 2023, 1:39 PM Jose Valenzuela <Jose.Valenzuela@fresno.gov> wrote:

Hello:

Thank you for reaching out. Your comments will be reviewed and included in the project record. For additional information on the proposed project, please visit our Plans and Projects Under Review webpage to download the Costco Commercial Center Draft Environmental Impact Report and associated studies.

Plans & Projects Under Review – City of Fresno

If you have further questions or comments, please let us know.

Thank you,

**Jose Valenzuela | Supervising Planner**

Current Planning | Planning & Development

2600 Fresno Street | Fresno CA 93721

559.621.8070

Jose.Valenzuela@Fresno.gov

**Resources**: Planning & Development | GIS Data Hub – Interactive Zoning Map | Fresno Municipal Code | Accela Citizens Access (ACA) Online Plans/Permits/Inspections | ACA Instruction Videos

**From:** Lorraine Arrington <larrington722@gmail.com>
**Sent:** Friday, July 21, 2023 1:37 PM
**To:** Jose Valenzuela <Jose.Valenzuela@fresno.gov>
**Subject:** Costco new warehouse

**External Email:** Use caution with links and attachments

Please sir, don't let them come to this city, or Clovis. 3 Costcos are enough. We don't want to to put all our other choices for groceries out of business.

Why not open a huge farmers market with bread, cheese, produce and other things instead of mass produced products like what costco sells??

Thank you,

Lorraine

This letter was already submitted 7/21 and is in the matrix and PDF above. The 7/24 response from her is a thank you which I recorded. SJS, UPP

## Letter I57 Lorraine Arrington

July 24, 203

Response I57-1

The comment is a follow-up response to a previously submitted comment (Comment I43-1) and does not raise any significant environmental issues; therefore, no response is required.

Letter I58

**From:** Patricia Yaralian
**To:** Jose Valenzuela
**Subject:** Costco
**Date:** Tuesday, July 25, 2023 4:58:09 AM

**External Email:** Use caution with links and attachments

Greetings Mr. Valenzuela,

I live west of 99 and Herndon and use Herndon to commute into Fresno. The problem begins at the gas station on Parkway Drive and Herndon 99 underpass. Cars park on the road waiting for pumps..ON THE ROAD! Going along...the traffic signal at NB 99 exit to Herndon contributes to EB traffic backup. We are stuck underneath 99 for a long time. Okay...then heading east..traffic must stop for trains and the school busses that must stop regardless. All that impedes the flow of traffic.

After the tracks EB Herndon has a right turn lane going into Target El Paseo Marketplace. That backs up because of the inside parking lot stop sign past McDonalds. No one can get into parking lot fast enough..so....drivers use the middle lane of Herndon to cut into right turn lane if they can find an opening. When there is no opening..the middle lane comes to a stop as well while we wait for the inconsiderate driver to figure it out. In the meantime, cars are coming out of shopping center west of McDonald's cutting across lanes to find Uturn signal light near OliveTree Restaurant.

Now..let me mention the most important reason building COSTCO is a really bad idea...THE KIDS, THE KIDS, THE KIDS. There are two schools you MUST take into consideration. YOU MUST. These kids have their eyes looking down at their phones (like most drivers) and really aren't paying attention to the inattentative drivers and what is going on around them.

This isn't the hometown feeling of the Fresno I want to be proud of. FRESNO is loosing it's IDENTITY. It's just a wannabe (gonnabe) large city sprawling out of control. And it is out of control. Already. Stop the MADNESS. I58-1

Ask yourself what you really care about? Development dollars or the safety of people in Fresno? Because that area is NOT safe, road rage promoting scenarios at every stretch of that part of Herndon.

Haven't the planners learned anything from SHAW AVENUE west of 99? Focus on fixing that mess. Please don't make a new UNSAFE mess. Besides there is no other eastbound road choice that can get us into Fresno from the farming community west of 99.

I invite you to drive along with me ANYDAY and ANYTIME of the week. Please let me drive you, and show you step by step what I encounter daily in that area. And it's really sad, because I haven't even hit the 50 mph speed limit yet. Oh, is it 50? Everyone else is driving 65+.

If you have any love for Fresno and promoting a healthy environment, please take me up on my invitation to drive with me. Should only take an hour of your time in the 1/8 mile distance.

Sincerely,

Pat Yaralian
559.277.2845 RSVP

## Letter I58 Pat Yaralian

July 25, 2023

**Response I58-1**

The comment describes existing traffic issues in the project vicinity. The comment also expresses concerns that the proposed project would pose roadway safety issues. This comment is similar to Comments I4-1 and I5-1. Please refer to Responses I4-1 and I5-1 for a discussion regarding the proposed project's impacts related to transportation, including traffic and safety hazards. This comment does not offer any specific concern related to the adequacy of the Draft EIR; therefore, no revisions to the Draft EIR are necessary in response to this comment. The comment is included in the record, which will be considered by the decision makers in their deliberations over potential approval of the proposed project.

Letter I59

**From:** michael van
**To:** Jose Valenzuela
**Subject:** New Costco
**Date:** Tuesday, July 25, 2023 9:54:38 AM

External Email: Use caution with links and attachments

As a resident within 2 miles of the new site I am 100 percent for it best thing to happen in my area since Carnegie got repaved … Team Costco ..Michael

I59-1

Sent from my iPhone

## Letter I59 Michael Van

July 25, 2023

**Response I59-1**

The comment expresses support for the proposed project. This comment does not address the adequacy of the Draft EIR analysis; therefore, no revisions to the Draft EIR are necessary in response to this comment. The comment is included in the record, which will be considered by the decision makers in their deliberations over potential approval of the proposed project.

Letter I60

**From:** Sabrina Hernandez
**To:** Jose Valenzuela
**Cc:** Andrew Kloose
**Subject:** NW Fresno Costco Comments
**Date:** Wednesday, July 26, 2023 8:57:18 PM

**External Email:** Use caution with links and attachments

Good Evening Supervising Planner Valenzuela,

I have three questions for the city regarding the proposed construction of a new Costco near me:

1. How can we better ensure safety for our students/community who are walking to and from school, as well as El Paseo Marketplace? I60-1

2. How can we work together to lessen the impact of environmental pollution/poor air quality in this area (as we already sit in the trifecta of the 99 Freeway-Veterans Boulevard-Santa Fe Railroad)...not to mention the Sierra Skypark a couple miles away from the proposed location? I60-2

3. How can we support/highlight our small/local businesses through this project (as this will also impact their sales/staffing)? I60-3

Thank you for your time and consideration of this request for response.

Your partner in community,

Sabrina Hernandez
5278 W Beechwood Ave, Fresno, CA 93722
(559) 824-6499

## Letter I60 Sabrina Hernandez

July 26, 2023

Response I60-1

The comment expresses concern about pedestrian safety in relation to the proposed project and other nearby development. Please refer to Responses I4-1 and I5-1 for a discussion regarding the proposed project's impacts related to transportation, including traffic and safety hazards. This comment does not offer any specific concern related to the adequacy of the Draft EIR; therefore, no revisions to the Draft EIR are necessary in response to this comment. The comment is included in the record, which will be considered by the decision makers in their deliberations over potential approval of the proposed project.

Response I60-2

The comment raises concerns about pollution and poor air quality in the area. Please refer to Response I5-1 regarding the proposed project's impacts related to air quality. This comment does not offer any specific concern related to the adequacy of the Draft EIR; therefore, no revisions to the Draft EIR are necessary in response to this comment. The comment is included in the record, which will be considered by the decision makers in their deliberations over potential approval of the proposed project.

Response I60-3

The comment raises concerns about the proposed project's effects on small businesses. This comment is similar to I10-1 and I43-1. Please refer to Responses I10-1 and I43-1 regarding the economic effects of the proposed project. No revisions to the Draft EIR are necessary in response to this comment. The comment is included in the record, which will be considered by the decision makers in their deliberations over potential approval of the proposed project.

Letter I61

**From:** Javier Morales
**To:** Jose Valenzuela
**Subject:** New proposed Costco comment
**Date:** Thursday, July 27, 2023 5:56:00 AM

External Email: Use caution with links and attachments

Hi Jose,

Thank you in advance for accepting comments about the new proposal to build the Costco on Herndon/99.

I live in the area of Herndon/99 and can say that traffic congestion is a major issue. I believe the thinking is that the opening of Veterans Blvd will help remedy that but I don't think that will be the case. In fact, I think it will increase traffic congestion to the area as it will make it easier for those who benefit from Veterans Blvd to get to the Target shopping center more convenient.

In addition, the train tracks on Herndon/99 would continue to be another issue with the increased traffic as there are many times when the train will stop in its tracks for up to 30 minutes. Sure, there will be Veterans Blvd but for many families the access to their homes is still via that intersection. So, it theory it will be worse with the additional vehicular traffic to Costco combined with the already poor planning of road ways to accommodate traffic. I61-1

In closing, I am a Costco member and it would be convenient to have a closer and bigger Costco but I truly believe that Herndon/99 is not the right place for it. It will make traffic unbearable and be similar to the issues we currently experience on Shaw/Golden State where the existing Costco is operating.

Thank you again for accepting comments and hope that this finds its way to all decision makers. Happy to discuss via phone as well.

Best,
Javier Morales
559-970-9677

## Letter I61 Javier Morales

July 27, 2023

Response I61-1

The comment expresses concerns about the proposed project's contribution to traffic congestion and opposition to the proposed project's location. Although the topic of traffic congestion is a factor for consideration by the decision-makers in acting on the proposed project, pursuant to CCR Section 15064.3, automobile delay and similar metrics relating to vehicular roadway capacity and traffic congestion are not considered a significant impact on the environment under CEQA. Please refer to Response I4-1 for a discussion regarding the proposed project's impacts related to transportation and Response I18-1 for a response to concerns related to traffic and operation of the existing railroad. This comment does not offer any specific concern related to the adequacy of the Draft EIR; therefore, no revisions to the Draft EIR are necessary in response to this comment. The comment is included in the record, which will be considered by the decision makers in their deliberations over potential approval of the proposed project.

Letter I62

**From:** We Wynts
**To:** Jose Valenzuela
**Subject:** COSTCO move - resounding YES!!!
**Date:** Thursday, July 27, 2023 9:11:43 AM

External Email: Use caution with links and attachments

Good morning, Mr. Valenzuela!
I wanted to take a moment to share our opinion on the current COSTCO relocation proposal.
We have lived in the Alluvial/RiverVista loop for 23years now and have zero intention of leaving our beloved home and community.Our neighborhood was all dead orchards and dirt when we first bought, but we did our homework to know what type of zoning and development options were in the surrounding vacant lots. This was a huge investment and we took it seriously and for the long haul, naming our home Unser Ewiges Heim, which translates from German (our ancestral heritage of majority) to Our Forever Home.
As you know, COSTCO is an incredibly reputable brand that could bring great value in a variety of ways to our booming Northwest community. In our opinion, they represent far greater value than any other anchor store. Development of that property still must happen, regardless of what ends up on that lot. Yes, with growth comes increased traffic. However, if that area becomes more homes, that translates to that much more usage of an already outgrown COSTCO on Shaw. Can that area withstand the increased traffic/parking/congestion in the existing COSTCO location? Is that fair to that location and its employees to continue providing an increase in resources within the same already cramped footprint? Further, ask those neighboring residents and I am guessing they would say, "Please move, COSTCO," for a variety of their own reasons. As well, there are many in that community that are saying, "If they move farther north, it will be too far." Clearly, you cannot please all of the people all of the time. However, the folks who bought with adjacent land still vacant and undeveloped, took that risk. Their choice and voice should not be allowed to drown out the rest of the Northwest community. We see this as a positive step toward keeping this community current and not leaving it to die, only then requiring the city to step in, spend millions of additional tax dollars and yet again revitalize an overlooked area that could have easily been maintained for the successful long haul.
We would greatly appreciate it if you would welcome COSTCO with open arms!
Respectfully,
James & Louisa Weyant

Sent from my iPhone

I62-1

## Letter I62 James and Louisa Weyant

July 27, 2023

Response I62-1

The comment expresses support for the proposed project. This comment does not address the adequacy of the Draft EIR analysis; therefore, no revisions to the Draft EIR are necessary in response to this comment. The comment is included in the record, which will be considered by the decision makers in their deliberations over potential approval of the proposed project.

Letter I63

**From:** Shirley Hutchison
**To:** Jose Valenzuela
**Subject:** new Costco
**Date:** Thursday, July 27, 2023 9:40:32 AM

**External Email:** Use caution with links and attachments

The planned new Costco at Riverside and West Herndon would be a big plus for Fresno. Fresno needs more shopping as the population grows. A larger store means more selections and products. Costco prices are reasonable because they have great buying power and give the people of this area of the valley access to good prices. More people from around the valley will shop there and will increase the city's tax revenue. It is a win-win to allow the new, larger Costco to be built. I63-1
Residents are complaining about the traffic and the schools but something will eventually be built on that land and the situation will have to be faced eventually. I remember when Herndon Avenue was pretty much fig trees. I welcome the new large Costco!

Shirley Hutchison

## Letter I63 Shirley Hutchison

July 27, 2023

Response I63-1

The comment expresses support for the proposed project. This comment does not address the adequacy of the Draft EIR analysis; therefore, no revisions to the Draft EIR are necessary in response to this comment. The comment is included in the record, which will be considered by the decision makers in their deliberations over potential approval of the proposed project.

Letter I64

**From:** Maria Le on
**To:** Jose Valenzuela
**Subject:** Proposed Costco for Herndon Ave.
**Date:** Thursday, July 27, 2023 12:50:43 PM

**External Email:** Use caution with links and attachments

Dear Mr. Valenzuela,

I currently live in the area where the proposed Costco is to be placed however I find the need to express my dissatisfaction with the proposal. The area is already plagued by heavy traffic and a Costco would only further exasperate that issue.

There is a large open area on Golden State/Herndon that used to house several gas stations that would be a better location for this sized Costco with all the extras it's attempting to provide to the community. I'm not against the Costco just the current selected location. I appreciate your time and ask that the City genuinely consider the impact a store of this size will have on the area. I64-1

Best,
Maria L.

## Letter I64 Maria Leon

July 27, 2023

Response I64-1

The comment expresses opposition to the location selected for the proposed project and raises concerns related to traffic. Although the topic of traffic congestion is a factor for consideration by the decision-makers in acting on the proposed project, pursuant to CCR Section 15064.3, automobile delay and similar metrics relating to vehicular roadway capacity and traffic congestion are not considered a significant impact on the environment under CEQA. Please refer to Response I4-1 for a discussion regarding the proposed project's impacts related to transportation. The comment suggests an alternative location at Golden State Boulevard and West Herndon Avenue. As described in Section 3.13, "Transportation and Circulation," in the Draft EIR, modification of this area is limited by existing and proposed developments, including the alignment of the California High Speed Rail project. Please refer to Chapter 6, "Alternatives," in the Draft EIR, which provides a brief analysis of three potential site alternatives. This comment does not offer any specific concern related to the adequacy of the Draft EIR; therefore, no revisions to the Draft EIR are necessary in response to this comment. The comment is included in the record, which will be considered by the decision makers in their deliberations over potential approval of the proposed project.

Letter I65

**From:** Norman S. Stahl
**To:** Jose Valenzuela
**Subject:** New Costco
**Date:** Thursday, July 27, 2023 1:22:46 PM

**External Email:** Use caution with links and attachments

I support the Construction of a new Costco complex in the vicinity of Riverside Drive and West Herndon Avenue. I65-1

*Norman S. Stahl*
**Norman S. Stahl**
**Lt. Colonel of Marines** (Retired)
3291 E Los Altos Ave
Fresno, CA 93710
(559) 900-7554 {Home - Landline}
(808) 895-0049 {Cell}

## Letter I65 Norman S. Stahl

July 27, 2023

Response I65-1

The comment expresses support for the proposed project. This comment does not address the adequacy of the Draft EIR analysis; therefore, no revisions to the Draft EIR are necessary in response to this comment. The comment is included in the record, which will be considered by the decision makers in their deliberations over potential approval of the proposed project.

Letter I66

**From:** Jesus Diaz
**To:** Jose Valenzuela
**Subject:** Proposed New Costco
**Date:** Thursday, July 27, 2023 3:58:03 PM

External Email: Use caution with links and attachments

It's in area that is growing, near freeway access and would help Fresno to be on the map with the largest Costco in the world. I66-1
Congestion is the future, no matter where you live.
Jesus Diaz

Sent from my iPhone

## Letter I66 Jesus Diaz

July 27, 2023

Response I66-1

The comment expresses support for the proposed project. This comment does not address the adequacy of the Draft EIR analysis; therefore, no revisions to the Draft EIR are necessary in response to this comment. The comment is included in the record, which will be considered by the decision makers in their deliberations over potential approval of the proposed project.

Letter I67

**From:** ANTHONY SCHEIDEMAN
**To:** Jose Valenzuela
**Subject:** New Costco
**Date:** Thursday, July 27, 2023 4:38:23 PM

External Email: Use caution with links and attachments

I am sending this message in support to the new Costco. The city of fresno should be bending over backwards to make this project happen. The current location on Shaw is a mess with traffic. Herndon is much better suited to handle the traffic. By moving to the new location it will actually free up the traffic on Shaw. I hope that this project is fast tracked so it can be open as soon as possible. Thank you. I67-1

Anthony Scheideman
Sent from my iPad

## Letter I67 Anthony Scheideman

July 27, 2023

Response I67-1

The comment expresses support for the proposed project. This comment does not address the adequacy of the Draft EIR analysis; therefore, no revisions to the Draft EIR are necessary in response to this comment. The comment is included in the record, which will be considered by the decision makers in their deliberations over potential approval of the proposed project.

Letter I68

**From:** Rick Haskill
**To:** Jose Valenzuela
**Subject:** Fwd: Costco
**Date:** Friday, July 28, 2023 6:19:50 AM

**External Email:** Use caution with links and attachments

Begin forwarded message:

**From:** Rick Haskill <usc88@sbcglobal.net>
**Date:** July 28, 2023 at 06:13:23 PDT
**To:** jose.valenzuela@fresni.gov
**Subject: Costco**

Good Morning!
I just wanted to voice my support for the newly proposed Costco. While not a Fresno resident, I have a place in Shaver Lake and would find the new Costco to be well worth the drive. We now utilize the existing Costco, but the thought of having one with the proposed amenities make it much more attractive. I68-1
Thank you,
Rick and Kathy Haskill

## Letter I68 Rick and Kathy Haskill

July 28, 2023

Response I68-1

The comment expresses support for the proposed project. This comment does not address the adequacy of the Draft EIR analysis; therefore, no revisions to the Draft EIR are necessary in response to this comment. The comment is included in the record, which will be considered by the decision makers in their deliberations over potential approval of the proposed project.

Letter I69

**From:** Kevin Cartwright
**To:** Jose Valenzuela
**Subject:** Love the Largest Costco in Fresno!
**Date:** Friday, July 28, 2023 1:12:54 PM

External Email: Use caution with links and attachments

Don't let the naysayers stop this great project! I69-1

Sent from my iPhone

## Letter I69 Kevin Cartwright

July 28, 2023

Response I69-1

The comment expresses support for the proposed project. This comment does not address the adequacy of the Draft EIR analysis; therefore, no revisions to the Draft EIR are necessary in response to this comment. The comment is included in the record, which will be considered by the decision makers in their deliberations over potential approval of the proposed project.

Letter I70

**From:** Adalino@GibraltarSecurity.com
**To:** Jose Valenzuela
**Subject:** (New Fresno Costco)
**Date:** Friday, July 28, 2023 3:49:36 PM

**External Email:** Use caution with links and attachments

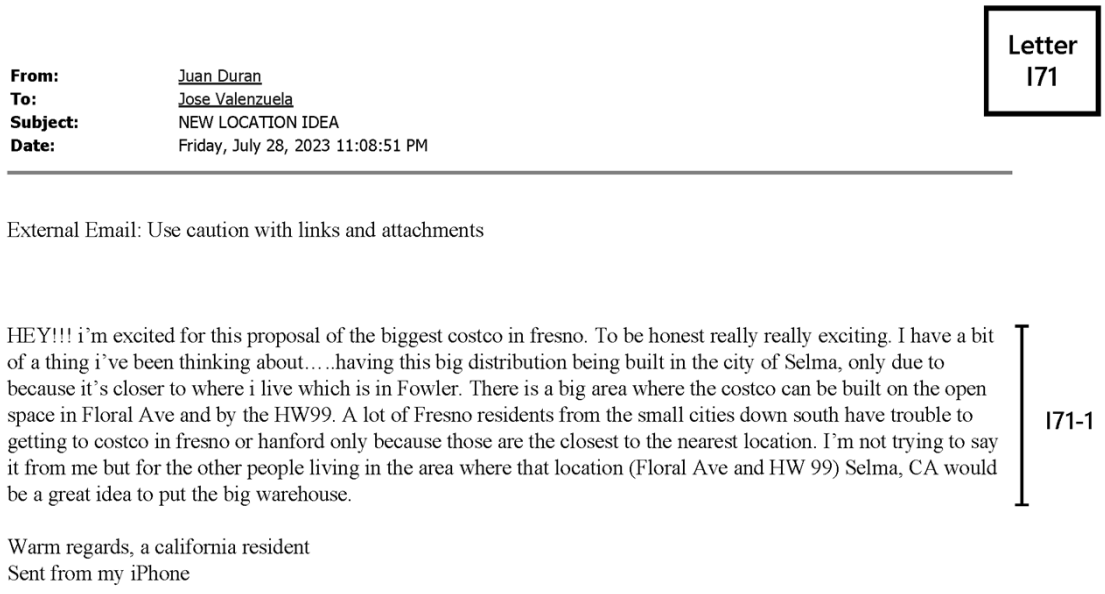
Hi, Mr. Valenzuela, this is just my opinion, if for any reason dont pass the new location, you should move it ( apply) 5 minutes north? because there is not location until you hit Merced or Fresno? just thinking for the people close to other towns like Chowchilla , Madera, thank you. I70-1

## Letter I70 Adalino

July 28, 2023

Response I70-1

The comment suggests an alternative location for the proposed project. This comment is similar to Comment I37-1. Please refer to Response I37-1 regarding alternatives to the proposed project. This comment does not offer any specific concern related to the adequacy of the Draft EIR; therefore, no revisions to the Draft EIR are necessary in response to this comment. The comment is included in the record, which will be considered by the decision makers in their deliberations over potential approval of the proposed project.



Letter I71

**From:** Juan Duran
**To:** Jose Valenzuela
**Subject:** NEW LOCATION IDEA
**Date:** Friday, July 28, 2023 11:08:51 PM

External Email: Use caution with links and attachments

HEY!!! i'm excited for this proposal of the biggest costco in fresno. To be honest really really exciting. I have a bit of a thing i've been thinking about…..having this big distribution being built in the city of Selma, only due to because it's closer to where i live which is in Fowler. There is a big area where the costco can be built on the open space in Floral Ave and by the HW99. A lot of Fresno residents from the small cities down south have trouble to getting to costco in fresno or hanford only because those are the closest to the nearest location. I'm not trying to say it from me but for the other people living in the area where that location (Floral Ave and HW 99) Selma, CA would be a great idea to put the big warehouse. I71-1

Warm regards, a california resident
Sent from my iPhone

## Letter I71 Juan Duran

July 28, 2023

Response I71-1

The comment expresses support for the proposed project. This comment does not address the adequacy of the Draft EIR analysis; therefore, no revisions to the Draft EIR are necessary in response to this comment. The comment is included in the record, which will be considered by the decision makers in their deliberations over potential approval of the proposed project.

Letter I72

**From:** Miguel Duran
**To:** Jose Valenzuela
**Subject:** Expressing Approval and Excitement for the World"s Largest Costco in Fresno
**Date:** Saturday, July 29, 2023 10:37:03 AM

External Email: Use caution with links and attachments

Dear Jose,

I hope this email finds you well. My name is Miguel Duran, a resident of Fresno, and I am writing to voice my opinion regarding the proposed construction of the world's largest Costco in our city.

I recently heard about the exciting plans to build this impressive establishment, and I want to express my wholehearted approval and excitement for the project. As a loyal Costco customer and a resident of Fresno, I firmly believe that this new development would be a significant addition to our community.

Costco is renowned for its quality products, excellent service, and fair prices, and having the world's largest Costco in Fresno would not only attract shoppers from the local area but also from surrounding regions. This, in turn, could potentially boost the local economy and create new job opportunities for our fellow residents.

Furthermore, I am confident that such a large-scale establishment would also enhance the city's overall infrastructure and contribute positively to Fresno's growth and development.

If there is any way for me to support or advocate for this project, please let me know. I am more than willing to participate in any community initiatives or public hearings that could help move the construction process forward.

Once again, I want to express my enthusiastic support for the proposed world's largest Costco in Fresno. I believe it has the potential to bring numerous benefits to our city, and I am excited about the prospects it holds for our community's future.

Thank you for considering my input, and I look forward to any updates or opportunities to get involved in this exciting venture.

I72-1

Sincerely,

Miguel Duran
migueldurán.wn@gmail.com

# Letter I72 Miguel Duran

July 28, 2023

**Response I72-1**

The comment expresses support for the proposed project. This comment does not address the adequacy of the Draft EIR analysis; therefore, no revisions to the Draft EIR are necessary in response to this comment. The comment is included in the record, which will be considered by the decision makers in their deliberations over potential approval of the proposed project.

Letter I73

**From:** Fabrizio Robalino
**To:** Jose Valenzuela
**Subject:** Costco Commercial Center Plans
**Date:** Monday, July 31, 2023 9:48:03 AM

**External Email:** Use caution with links and attachments

Hi Jose,

I am Fabrizio Robalino and would like to request access to the Costco Commercial Center plans. I understand that open comments can be made as the EIR report is available for public review. Please let me know if these are available and if they can be shared with me. I really appreciate it. I73-1

Best,
Fabrizio

## Letter I73 Fabrizio Robalino

July 31, 2023

Response I73-1

The comment is a request to review the Draft EIR. This comment is similar to Comment I42-1. Please refer to Response I42-1 regarding circulation of the Draft EIR for the proposed project. The City provided the commenter with access to the Draft EIR, as requested. This comment does not address the adequacy of the Draft EIR analysis; therefore, no revisions to the Draft EIR are necessary in response to this comment.

Letter I74

**From:** Sal Romero
**To:** Jose Valenzuela
**Subject:** Costco Plan
**Date:** Monday, July 31, 2023 7:19:53 PM

**External Email:** Use caution with links and attachments

Hello Jose,

I hope all is well. I'm writing to let you know that we support the Costco project that is planned near our home. As a matter of fact I can walk to it from my home by walking on Spruce Ave heading west.

I understand the concern of some of my neighbors that it will bring more traffic, but I feel that once the Veterans Blvd expressway is open that will alleviate some of the traffic issues that we currently have on Herndon. I74-1

Costco is a great neighbor and they maintain their properties in good condition. Please let me know if I can get more of my neighbors to write a letter in support of this project. From what I've heard is that most of my neighbors agree that it's a good thing to have Costco near us.

Warm regards,

Celso "Sal" Romero, Jr., Broker/Realtor CA BRE#01397875

6174 W Marble Hill Dr, Fresno, CA 93722
(559) 307-7672 - Office
(559) 978-8877 - Direct
celsoromero@yahoo.com - e-mail
salromero72@gmail.com - secondary e-mail

Sent from Yahoo Mail for iPhone

## Letter I74 Celso "Sal" Romero, Jr.

July 31, 2023

Response I74-1

The comment expresses support for the proposed project. This comment does not address the adequacy of the Draft EIR analysis; therefore, no revisions to the Draft EIR are necessary in response to this comment. The comment is included in the record, which will be considered by the decision makers in their deliberations over potential approval of the proposed project.

Letter I75

**From:** Cindy Diaz
**To:** Jose Valenzuela
**Date:** Tuesday, August 01, 2023 4:24:57 PM

**External Email:** Use caution with links and attachments

That would be fantastic to have the BIGGEST Costco ever! The ones who are complaining we KNOW they will be shopping there regardless! I live close in the area and there is no problem with kids walking in the area.. schools etc.. traffic has ALWAYS been busy on Herndon ... MAKE this happen! Fresno needs this, I see nothing but positive in having this new location! I75-1

## Letter I75 Cindy Diaz

August 1, 2023

Response I75-1

The comment expresses support for the proposed project. This comment does not address the adequacy of the Draft EIR analysis; therefore, no revisions to the Draft EIR are necessary in response to this comment. The comment is included in the record, which will be considered by the decision makers in their deliberations over potential approval of the proposed project.

Letter I76

**From:** Joy Hinrichsen
**To:** Jose Valenzuela
**Subject:** Costco
**Date:** Wednesday, August 02, 2023 4:13:25 PM

External Email: Use caution with links and attachments

My husband and I recently retired and moved to Fresno a year and a half ago. I'm still trying to figure out why people make fun of Fresno. We lived in Santa Clarita for 32 years and don't miss it at all. We've been to Grizzlies games several times and recently signed up for next year's subscription to the Saroyan Theater. We love it here! Fresnans are so friendly, the cost of living is certainly better than L.A. and the traffic is practically nothing compared with SoCal. Speaking of traffic… I'm very concerned with the definite probability of what will happen when NW Fresno - a RESIDENTIAL area - becomes the home to "the world's largest Costco". There's already a good Costco over on Blackstone in addition to the one on Shaw. My point is… I (and my neighbors) are absolutely unhappy with the prospect of "the world's largest Costco" being built in our backyard. It will create traffic problems and hinder access to the 99 freeway. Schoolchildren in the area can be endangered by the additional traffic as well. Please find somewhere else to build this behemoth - it will lower property values and disturb the tranquility of NW Fresno. I76-1

Also, why aren't you doing anything to stop the illegal business activity of pop-up food vendors in the Tower district? They are a blight on an otherwise cool, trendy area and steal business from otherwise legal Mom and Pop places on Olive area. Two of my neighbors already got bacterial bowel infections by eating food from those vendors. Maybe someday, when someone sues the city for allowing those illegal businesses to operate, maybe then they'll get shut down. I76-2

I'd appreciate a response, but more so, I'd prefer if you can find someplace else for that Costco (and a shutdown of those disgusting, filthy, illegal pop-up vendors.)
Joyce Hinrichsen

Sent from my iPhone

## Letter I76 Joy Hinrichsen

August 2, 2023

### Response I76-1

The comment expresses concerns related to traffic, freeway access, and student safety. This comment is similar to Comments I4-1 and I5-1. Please refer to Responses I4-1 and I5-1 for a discussion regarding the proposed project's impacts related to transportation. The comment also expresses concerns related to property values. The proposed project's effect on property values in the vicinity of the project site is not, in and of itself, a significant impact under CEQA. The potential for indirect environmental impacts to occur as a result of the proposed project's contribution to social or economic changes in the project vicinity is addressed in Response I10-1. This comment does not offer any specific concern related to the adequacy of the Draft EIR; therefore, no revisions to the Draft EIR are necessary in response to this comment. See also Chapter 6, "Alternatives," in the Draft EIR, which considers potential offsite alternatives to the proposed project. The comment is included in the record, which will be considered by the decision makers in their deliberations over potential approval of the proposed project.

### Response I76-2

The comment expresses concerns regarding food vendors. The comment does not pertain to the proposed project; therefore, no response is required.

Letter I77

**From:** Central Valley Lawnscapes
**To:** Jose Valenzuela
**Subject:** New Costco
**Date:** Thursday, August 03, 2023 2:22:18 PM

**External Email:** Use caution with links and attachments

Good afternoon Jose,

I was looking online at the new costco project on herndon and 99 area and I wondered if you knew who the developer was for the project. I am an estimator for Central Valley Lawnscapes and I have been in search of who will be posting the bid to bid the landscape and planting portion of that project. Would you have any idea who is doing it? I77-1

Thanks you for any help that you can provide,

--
**Garrett Schaefer**
**Estimator**
**Central Valley Lawnscapes**
**8195 E Olive Ave. Fresno Ca.**
**Cell: 559-313-1171**
**Email: CVLoffices@gmail.com**

## Letter I77 Garrett Schaefer

August 3, 2023

Response I77-1

The comment expresses interest in future employment opportunities related to the proposed project. This comment does not address the adequacy of the Draft EIR analysis; therefore, no response is required.

Letter I78

**From:** Lynda Allison Doty
**To:** Jose Valenzuela
**Subject:** Costco
**Date:** Tuesday, August 08, 2023 1:05:31 PM

External Email: Use caution with links and attachments

Please leave well enough alone and do not build this new NE Costco. Too much traffic, and congestion. It would be a big mistake. I78-1

Blessings!
Lynda Allison Doty

Blessings!
Lynda Allison Doty, Ph.D
www.awpministries.org

## Letter I78 Lynda Allison Doty

August 8, 2023

Response I78-1

The comment expresses opposition to the proposed project and raises concerns related to traffic and congestion. Although the topic of traffic congestion is a factor for consideration by the decision-makers in acting on the proposed project, pursuant to CCR Section 15064.3, automobile delay and similar metrics relating to vehicular roadway capacity and traffic congestion are not considered a significant impact on the environment under CEQA. Please refer also to Response I4-1. This comment does not offer any specific concern related to the adequacy of the Draft EIR; therefore, no revisions to the Draft EIR are necessary in response to this comment. The comment is included in the record, which will be considered by the decision makers in their deliberations over potential approval of the proposed project.

Letter I79

**From:** Brenda Cosio
**To:** Jose Valenzuela
**Subject:** Costco New store Input
**Date:** Tuesday, August 08, 2023 9:20:06 AM
**Attachments:** image001.png
image002.png
image003.png

Hi Jose,

I wanted to forward some community input our office received regarding the proposed Costco store on the corner of Herndon and Riverside Dr. I saw in the Fresno Bee that community members can submit public comments until August 26 so I'm sending this over to you.

The reporting party is:

Tom Basset
Phone- 559-367-9425
Address: 1641 N Harrison Ave
Email: dbbill@pacbell.net

"Unsure if you have votes to approve or disapprove Costco new store. If so, I would strongly encourage you to vote NO. If not, I would encourage you to still express major concerns. My reasoning is; if you look at a map you will notice this planned store will leave a bigger gap for South of Shaw Ave residents. This is how Fresno ended up with a decimated downtown. I might discontinue shopping at Costco. Alternative to voting against is if Costco agrees to establish a store more centrally located, in short period of time from closure of west Shaw store. We have money also! Hopefully, the big money people haven't bought this project. Thanks, and hope to hear something positive." I79-1

Thank you,

**Brenda Cosio (She/Her)**
Council Assistant • District 1
Office of Council Vice President Annalisa Perea

**Phone** 559-621-7817
**Email: Brenda.cosio@fresno.gov**
www.fresno.gov
Fresno City Hall • 2600 Fresno Street • Fresno, CA 93721

## Letter I79 Tom Basset

August 8, 2023

Response I79-1

The comment expresses opposition to the location for the proposed project and requests a more central location. This comment does not address the adequacy of the Draft EIR analysis; therefore, no revisions to the Draft EIR are necessary in response to this comment and no further response is required.

Letter I80

**From:** beth d
**To:** Jose Valenzuela
**Subject:** Comments New NW Costco Project
**Date:** Wednesday, August 09, 2023 10:58:23 AM

**External Email:** Use caution with links and attachments

Thank you for your time. I live nearby the new proposed NW Fresno Costco project. Back when Walmart first wanted to put a SuperStore on that property, I attended all the meetings to fight that project. I did not want that type of project there then and I still do not want this type of project there now.
When this Costco project was first proposed the store size was going to be much smaller in size. Now it is going to be the largest store in the world. It is going to have trucks coming in and out at all hours, lots of traffic from all over Fresno, adding to the pollution, noise and traffic we already face. With 32 gas pumps, a car wash and online fulfillment center. This will just increase traffic and noise in the area drastically. Costco keeps adding to the plans making this store larger and larger with changes that will increase traffic.
With the recently changes of W. Sierra & Veteran Blvd , and the planned changes to open W Spruce to make an entrance into Costco, this has increased traffic on N Polk. This is making it harder to exit the Villa Capri neighborhood during rush hour times. Once Costco is open and W Spruce is open to Costco, I expect the traffic on N Polk will be even heavier. This will make exiting onto N Polk even harder. I know stopping this Costco project is futile. At the very least, consider putting a stoplight at the intersection of N Polk/W Sierra to help give the residents of the Villa Capri neighborhood a chance of safely exiting their neighborhood. Especially with the planned development that is going in at that intersection.
Thank you for your time,
Beth Durbin
Fresno, CA

I80-1

## Letter I80 Beth Durbin

August 9, 2023

Response I80-1

The comment expresses opposition to the proposed project and raises concerns related to trucks, traffic, pollution, and noise. Section 3.3, "Air Quality," Section 3.11, "Noise and Vibration," and Section 3.13, "Transportation and Circulation," of the Draft EIR include analyses related to these topics. Please refer to Response I4-1 for a discussion regarding the proposed project's impacts related to transportation, Response I5-1 for a discussion regarding the proposed project's impacts related to air quality, and Response I30-1 for a discussion regarding the proposed project's impacts related to noise. This comment does not offer any specific concern related to the adequacy of the Draft EIR; therefore, no revisions to the Draft EIR are necessary in response to this comment. The comment is included in the record, which will be considered by the decision makers in their deliberations over potential approval of the proposed project.

Letter I81

**From:** Sandi Iley
**To:** Jose Valenzuela
**Subject:** My Vote is "NO" to the Proposed Costco on the corner of Herndon Ave. and Riverside Drive
**Date:** Wednesday, August 09, 2023 8:47:02 PM

**External Email:** Use caution with links and attachments

This is response to the newspaper article about the proposed Costco on the corner of Herndon Ave. and Riverside Drive. Spruce Ave. does not need to be extended along the southern edge of the golf course westward to Riverside Drive. I hear enough traffic on Spruce now and school buses pick up and drop children off during the school year. We do not need all the added traffic, noise and pollution day and night, there is enough with all the trains. Please build the Costco on the West side of Herndon. I81-1

I bought my house brand new in 1992 and my vote is NO.

Sandra J. ILEY
7191 North Lola Ave.
Fresno, CA 93722

## Letter I81 Sandra J. Iley

August 9, 2023

Response I81-1

The comment expresses opposition to the extension of Spruce Avenue and location of the proposed project, raising concerns related to traffic, noise, and pollution. As discussed on page 3.13-19 of the Draft EIR, extending West Spruce Avenue would be consistent with the City's planned roadway system depicted on Figure MT-1 of the City's General Plan Mobility and Transportation Element. Accordingly, the City's Traffic Planning Section would require the project proponent to extend West Spruce Avenue as a condition of project approval.

The environmental effects of extending West Spruce Avenue (including effects on transportation, noise, and air quality) have been evaluated in the Draft EIR. Please refer to Response I4-1 for a discussion regarding the proposed project's impacts related to traffic and Response I5-1 for a discussion regarding the proposed project's impacts related to air quality. With respect to noise, page 3.11-27 of the Draft EIR includes a discussion of project-generated traffic noise levels on the extended West Spruce Avenue. The Draft EIR concludes that traffic noise levels would not exceed the City's noise standard at nearby residential uses and concludes the impact would be less than significant (Impact 3.11-4). Pages 3.11-28 and 3.11-29 of the Draft EIR include a discussion of intermittent single-event noise levels from trucks operating in the project vicinity. The Draft EIR identifies mitigation that would require the project applicant to construct a sound wall and/or pave North Riverside Drive with a surface treatment with noise-reducing properties and concludes that mitigation would reduce the noise impact at nearby residences to a less-than-significant level (Impact 3.11-5). See also Response I30-1 for additional discussion regarding the proposed project's impacts related to noise and Response I15-1 for information about the extension of Spruce Avenue adjacent to the northern boundary of the project and anticipated effects on traffic patterns.

This comment does not offer any specific concern related to the adequacy of the Draft EIR; therefore, no revisions to the Draft EIR are necessary in response to this comment. The comment is included in the record, which will be considered by the decision makers in their deliberations over potential approval of the proposed project.

Letter I82

**From:** Stephanie S
**To:** Jose Valenzuela
**Subject:** Costco
**Date:** Thursday, August 10, 2023 2:59:40 PM

External Email: Use caution with links and attachments

Although I am a Costco shopper, the proposed location would be a disaster. I have to travel on Herndon daily to get home and when they closed off and eliminated the Grantland exit, that was the start of the problem traffic. Whoever plans the roads for the area obviously never drives there. Adding Costco traffic when a train crosses will cause traffic jams and accidents. It is horrible now, and adding traffic, especially during holidays would be foolish beyond belief.

Create an overpass for the train first, that would be helpful. Recreate an onramp from Herndon to get on 99 instead of what is there now. Maybe actually drive the area and see how it will affect those that live in the area.

I82-1

Stephanie S

## Letter I82 Stephanie S.

August 10, 2023

Response I82-1

The comment expresses opposition to the location of the proposed project, raising concerns related to traffic and safety. Although the topic of traffic congestion is a factor for consideration by the decision-makers in acting on the proposed project, pursuant to CCR Section 15064.3, automobile delay and similar metrics relating to vehicular roadway capacity and traffic congestion are not considered a significant impact on the environment under CEQA. Please refer to Response I4-1 for a discussion regarding the proposed project's impacts related to transportation. The comment also recommends improvements to the roadway network that are outside the scope of the project; accordingly, no further response is required.

This comment does not offer any specific concern related to the adequacy of the Draft EIR; therefore, no revisions to the Draft EIR are necessary in response to this comment. The comment is included in the record, which will be considered by the decision makers in their deliberations over potential approval of the proposed project.

Letter I83

**From:** thomas coppin
**To:** Jose Valenzuela
**Subject:** The largest Costco in the world
**Date:** Thursday, August 10, 2023 5:36:05 PM

**External Email:** Use caution with links and attachments

When Costco expanded in Salt Lake City, I went to see what the world's largest Costco was like as I live just north where our Costco is small. It is a wonder to walk through just to see how much is offered. It's staggering.

But most of the expansion caters to commercial customers such as restaurants. A restaurant can shop for a good part of their needs in one place. Costco has delivery trucks to deliver to larger customers. That means the enlargement didn't seem to result in a proportional increase in traffic. But the increased number of gas pumps certainly speeds up the lines for gas.

I would say to not fear the expansion. There are things the largest Costco doesn't have which I have seen in Boise such as a car wash and garden center. So the expansion to me was largely to cater to the commercial customers and didn't greatly increase the traffic.

I83-1

Thomas Coppin
Bountiful, Utah

Sent from Mail for Windows

## Letter I83 Thomas Coppin

August 10, 2023

**Response I83-1**

The comment expresses support for the proposed project. This comment does not address the adequacy of the Draft EIR analysis; therefore, no revisions to the Draft EIR are necessary in response to this comment. The comment is included in the record, which will be considered by the decision makers in their deliberations over potential approval of the proposed project.

Letter I84

**From:** Dawn Mathews
**To:** Jose Valenzuela
**Subject:** Proposed new Costco.
**Date:** Thursday, August 10, 2023 6:49:03 PM

**External Email:** Use caution with links and attachments

Mr. Valenzuela,
I live off of Grantland and Bullard and shop at the existing Costco on Shaw all the time and the traffic is ridiculous and no one seems to care. Why not build a bigger and better Costco off of Herndon which can handle the traffic as well if not better than Shaw right now. I'm sure they have a plan to expand the entrance and exit off of Herndon. I84-1

Sent from my Galaxy

## Letter I84 Dawn Mathews

August 10, 2023

Response I84-1

The comment indicates a preference for the proposed Costco location. This comment does not address the adequacy of the Draft EIR analysis; therefore, no revisions to the Draft EIR are necessary in response to this comment and no further response is required.

Letter I85

**From:** Larry Rodriguez
**To:** Jose Valenzuela
**Subject:** The new Costco
**Date:** Friday, August 11, 2023 8:43:46 AM

**External Email:** Use caution with links and attachments

If you want to see about the logistics of a new Costco, replacing an existing one, you should review the issues with the new Redding, California, Costco and the the Medford, Oregon, which was also relocated. What I found was:

Redding, California Costco was relocated from Redding downtown to a location next to Interstate 5 and included a new gas station. Those of us who drive on Interstate 5 found the new location great. However, it caused heavy congestion to those who wish to shop in the store and it has become a quick headache with traffic in the area. Expect it to become much worse when there is a gas shortage or the potentially long waiting lines start to impact Interstate 5 traffic at the freeway exits. Matter of fact, visit many of the Costco gas stations in the bay area when long waiting lines start to develop due to rising gas prices.

Medford, Oregon Costco relocated several years ago to a larger facility. The original Costco was located off Crater Lake Highway. The highway was built to accommodate the auto traffic to the Costco Gas Station from Interstate 5. The new Costco, that has been relocated to the new location and has been there some time, is accessible through a portion of neighborhood 2 lane city street from Interstate 5, leading to traffic delays and potential issues in the local neighborhood (like children in cross walks). Definitely an issue with city planning.

In summary, I would plan a minimum four lane path to Costco as well as secondary street access to local customers.

I85-1

Sent from Mail for Windows

## Letter I85 Larry Rodriguez

August 11, 2023

Response I85-1

The comment expresses concerns related to traffic and pedestrian safety. The comment provides observations of other Costco locations as examples and recommends roadway improvements to accommodate the traffic. Although the topic of traffic congestion is a factor for consideration by the decision-makers in acting on the proposed project, pursuant to CCR Section 15064.3, automobile delay and similar metrics relating to vehicular roadway capacity and traffic congestion are not considered a significant impact on the environment under CEQA. Please also refer to Response I4-1.

This comment does not offer any specific concern related to the adequacy of the Draft EIR; therefore, no revisions to the Draft EIR are necessary in response to this comment. The comment is included in the record, which will be considered by the decision makers in their deliberations over potential approval of the proposed project.

Letter I86

**From:** sylvia fernandez
**To:** Jose Valenzuela
**Subject:** costco
**Date:** Friday, August 11, 2023 4:27:28 PM

**External Email:** Use caution with links and attachments

Hi,
my name is SYLVIA FERNANDEZ born and raised in SF, going through a separation and thinking of relocating to FRESNO, would love to know more about future opportunities EMPLOYMENT I speak fluent spanish as well, let me know COSTCO sounds like a great new opportunity for myself.
gracias :)

I86-1

SYLVIA FERNANDEZ
415 279-2455

## Letter I86 Sylvia Fernandez

August 11, 2023

Response I86-1

The comment expresses interest in future employment opportunities related to the project. This comment does not address the adequacy of the Draft EIR analysis; therefore, no response is required.

New Costco

Letter I87

Jens Andersen <jbandersen2001@yahoo.com>

Sun 8/13/2023 3:30 PM

To:Jose Valenzuela <Jose.Valenzuela@fresno.gov>;

**External Email:** Use caution with links and attachments

Mr. Valenzuela,

I live on Riverside Drive a few houses down from the proposed Costco Store. While I greatly appreciate Costco and what they offer me as a consumer, I have great reservations about their chosen location for a new store. When we purchased our home, the lot that they have chosen was zoned for general commercial. I begrudgingly went along with their initial plans for a new store, understanding that it has to be placed somewhere, and trusting that the city of Fresno would ensure that proper traffic improvements were installed.

However, now the project has ballooned to a 240,000 square foot behemoth, that would include distribution of online orders. I don't know what zoning that would belong under - regional commercial for the store of this size or light industrial for distribution centers. Either way, it does not belong on a parcel that is wedged into residential area. I will urge the City of Fresno to stand by its zoning and suggest that Costco find another location. There is land available to the south along Riverside Drive, just off the soon to be completed Veterans Boulevard. That would be the perfect location for a project of this magnitude. I87-1

Sincerely,
Jens Andersen

## Letter I87 Jens Andersen

August 13, 2023

Response I87-1

The comment expresses reservations about the location of the proposed project, raises concerns related to zoning and traffic, and recommends an alternative location. Section 3.10, "Land Use and Planning," Section 3.13, "Transportation and Circulation," and Section 6, "Alternatives," of the Draft EIR include analyses related to these topics. This comment is similar to Comments I4-1, I10-1, and I37-1. Please refer to Response I4-1 for a discussion regarding the proposed project's impacts related to transportation, Response I10-1 for a discussion of the environmental effects that would result from the proposed changes to the general plan land use designations and zoning, and Response I37-1 regarding alternatives to the proposed project. This comment does not offer any specific concern related to the adequacy of the Draft EIR; therefore, no revisions to the Draft EIR are necessary in response to this comment. The comment is included in the record, which will be considered by the decision makers in their deliberations over potential approval of the proposed project.

Letter I88

# Proposed Northwest Fresno Costco project

Richee Xavonglianekham <richeexavong@gmail.com>

Mon 8/14/2023 7:14 AM

To:Jose Valenzuela <Jose.Valenzuela@fresno.gov>;

**External Email:** Use caution with links and attachments

Dear Mr. Valenzuela,

I hope this email finds you well. My name is Richee Xavonglianekham (sa-vawng-lien-kam), and like many Fresno area residents voicing their opinions on the proposed Costco project in Northwest Fresno, I too would like to share my opinions with you regardless if this feedback will have any effect with moving forward on this project.

As a fellow Fresno resident who has relatives living close to the proposed Costco site, **I strongly object** to this project. Traffic is one of the primary concerns as to why I object to the company's decision to construct the new store off Herndon and Riverside Avenues. As you, the Fresno City Council, Fresno City and County Public Works, and other members/groups -- including Costco -- that are a part of this project have heard complaints from residents in recent months -- and as discussed in local media coverage -- many residents living in the vicinity of the proposed store believe that by putting the store at that site will likely create bottlenecks and constraints for homeowners such as drivers speeding through residential neighborhoods, failing to obey posted speed limit signs, and possibly drivers possibly parking alongside Riverside Avenue should Costco's parking lot be at full capacity, and perhaps create inconvenience for residents trying to get to and from their homes; driveways and roadways could be blocked. And while Fresno is notorious for having increased air pollution and not to mention, worst drivers, adding a store at this proposed site will create conflicts with consumers and residents.

I88-1

If we take a look at the Clovis Costco on Clovis and Santa Ana Avenues, for example, the traffic flow of cars driving along Santa Ana Avenue by the store has somewhat created bottlenecks for residents living in that area. What was once a quiet area has now been flooded with cars traveling in and out of the neighborhood on a daily basis. And from personal experience, I have noticed some cars speeding or not paying attention and nearly hitting residents' cars on that street, or even residents/visitors. We don't want this happening to residents living around the Herndon and Riverside corridor, do we?

**Instead, the city should focus on building homes on the proposed Costco site.** Northwest Fresno has seen an influx of local and national homebuilders build homes in the area. And with the area expanding with more residential developments, perhaps the city should focus on bringing houses or apartments/townhomes on Herndon Avenue and Riverside Drive rather than let a big-box company/warehouse disrupt the flow of living in the area.

**But if we still want a new Costco store in Northwest Fresno**, I would recommend these two (2) options:

I88-2

1. **Option 1: Work with The Marketplace at El Paseo's owners to put Costco next to Floor and Decor**

   There is vacant land space on the corner of Riverside Drive and the newly opened Veterans Boulevard - next to Floor and Decor. While there is currently a "For Lease" sign posted, this particular space would accommodate a Costco. Relocating Costco to that site will provide additional shopping opportunities as the company could potentially be a part of The Marketplace at El Paseo. And consumers shopping in the center wouldn't have to travel too far out to reach the store since it is conveniently located within the shopping center.

2. **Option 2: Demolish the old Walmart at Shaw and Brawley Avenues and build a new Costco in its place -- along with a gas station.**

   The former Walmart building on Shaw and Brawley Avenues has been vacant since the company moved across its current location in 2018. While Walmart's old space continues to be vacant, this site would also accommodate a Costco. Additionally, there is vacant pad space on Brawley Avenue next to the store that has not been developed which could become Costco's Gas Station.

I88-2 cont.

I hope that this feedback that I have provided is helpful in whether to proceed with the final decision on Costco's project. I also thank you for allowing me to take this time to provide this feedback on the Costco project.

Sincerely,

Richee Xavonglianekham
Fresno resident
richeexavong@gmail.com

# Letter I88 Richee Xavonglianekham

August 14, 2023

**Response I88-1**

The comment expresses opposition to the proposed project, raising concerns related to traffic conditions, including congestion, violations, and accidents, as well as air pollution. Although the topic of traffic congestion is a factor for consideration by the decision-makers in acting on the proposed project, pursuant to CCR Section 15064.3, automobile delay and similar metrics relating to vehicular roadway capacity and traffic congestion are not considered a significant impact on the environment under CEQA. Please refer to Response I4-1 for a discussion regarding the proposed project's impacts related to transportation and Response I5-1 for a discussion regarding the proposed project's impacts related to air quality. The comment also expresses concerns related to parking. As described on page 1-4 of this Final EIR, the proposed project would include 873 parking stalls, which meets the City' of Fresno's minimum parking requirements and would be sufficient to accommodate the project's parking demand.

This comment does not offer any specific concern related to the adequacy of the Draft EIR; therefore, no revisions to the Draft EIR are necessary in response to this comment. The comment is included in the record, which will be considered by the decision makers in their deliberations over potential approval of the proposed project.

**Response I88-2**

The comment recommends the construction of residential land uses on the project site and suggests alternative locations for the proposed project. In accordance with State CEQA Guidelines Section 15126.6(a), the Draft EIR evaluated a range of reasonable alternatives to the proposed project. As discussed on pages 6-3 through 6-5, the City considered off-site locations, but dismissed these alternatives from further analysis because of their feasibility and because they would not clearly address the project's significant environmental effects. As discussed on pages 6-11 through 6-13, the Draft EIR also evaluated a Mixed-Use Costco Center Alternative (Alternative 3) that would adjust the land use mix on the project site to include high-density residential development. As shown in Table 6-1 of the Draft EIR, the environmental effects of this alternative would be largely similar to those of the proposed project.

As explained in the Draft EIR (page 2-1), the project site is designated Community Commercial in the City's General Plan. The City has planned the area for commercial development that serves the nearby residents. The comment does not provide evidence to support the conclusion that developing the project site with strictly residential land uses or developing the proposed project at an alternative location would avoid or substantially lessen any of the significant effects of the proposed project; therefore, there is no basis for considering such alternatives in the Draft EIR. In addition, the comment does not offer any specific concern related to the adequacy of the Draft EIR; therefore, no revisions to the Draft EIR are necessary in response to this comment. The comment is included in the record, which will be considered by the decision makers in their deliberations over potential approval of the proposed project.

# Opposition to New Costco Location

Letter I89

Janet's Bergmanfamily email <janet@bergmanfamily.net>

Tue 8/15/2023 5:22 PM

To:Jose Valenzuela <Jose.Valenzuela@fresno.gov>;

Dear Mr. Valenzuela:

I oppose the proposed new world's largest Costco at Herndon Avenue and Riverside Drive.

The back way into the location is filled with kids walking to and from bus stops and school. The increased traffic in the area would be a grave danger to them. There is also a small local park on that path.

Also, Herndon would end up being backed up in miles each direction during heavy traffic periods or when a train passed over Herndon near Golden State.

I would hate to move from my home of over 25 years if this gets approved, but I will do so to avoid living by this monstrosity.

I89-1

Sincerely,

Janet Bergman
6924 W Pinedale Avenue
Fresno, CA 93722
(559) 289-2854

## Letter I89 Janet Bergman

August 15, 2023

Response I89-1

The comment expresses opposition to the proposed project, raising concerns related to traffic and safety hazards for school-aged children. Please refer to Response I4-1 for a discussion regarding the proposed project's impacts related to transportation, including safety hazards. The comment also mentions a local park, which may be a reference to the stormwater retention basin east of Riverside Golf Course, but does not identify specific environmental concerns related to this facility.

The Draft EIR includes a discussion related to access to recreational facilities on page 3.12-4. The Draft EIR explains that the project would not physically obstruct access to existing recreational opportunities. As explained further in Response I5-1, pedestrian mobility in the vicinity may be improved through development of the project because it includes connections to planned pedestrian infrastructure. Further, the City of Fresno has met with the Central Unified School District regarding the proposed project to ensure that project-related truck deliveries do not pose a safety hazard for students at school bus drop-off/pick-up locations.

The comment does not offer any specific concern related to the adequacy of the Draft EIR; therefore, no revisions to the Draft EIR are necessary in response to this comment. The comment is included in the record, which will be considered by the decision makers in their deliberations over potential approval of the proposed project.

# opposition to the proposed Costco in NW Fresno

**Letter I90**

Robin Snowden <rsnow710@aol.com>

Thu 8/17/2023 11:14 PM

To:Jose Valenzuela <Jose.Valenzuela@fresno.gov>;

Cc:Mike Karbassi <Mike.Karbassi@fresno.gov>;

**External Email:** Use caution with links and attachments

Mr. Valenzuela -

My husband and I purchased property in NW Fresno, adjacent to the Riverside Golf Course on North Sandrini Avenue. What separates our home from the golf course is Ponding Basin EG (which by the way has seen better upkeep than in current years) - however the wildlife is beautiful and peaceful.

The addition of the homes in the subdivision on the opposite side of the Golf course was welcome as it was not commercial property. Prior to the addition of homes there was the addition of the Kingston Bay Memory Care Facility and prior to that was the Derrel's Storage facility - which blends in nicely with the scenery.

Our neighborhood is well-kept Hampton, Hampton Court, Hampton Renaissance, Liberty Square (Herndon and Hayes - all McCaffrey homes).

Our neighborhood is quiet, people walk their dogs, take their children/babies out, jog without fear of be mowed down by cars or excessive traffic. West Spruce Avenue dead-ends at the golf course. We have a small park there. Residents and their support personnel from Kingston Bay walk through the neighborhood daily - again without fear. The cost for housing in that facility is not inexpensive. Persons who lease space there did so because of its location.

The proposed placement of this Costco is an intrusive and dangerous project. Increased traffic on West Spruce - and eyesore in front of the beautiful and expensive homes located in front of Riverside Golf Course. Increased traffic on West Herndon and main road to the homes on the other side of the golf course. Then there is the lighting required to secure the building and the docking of trucks. Currently, at night the lighting is limited to street lights, which is ideal for home owners. I have no desire to stand on either of my decks, look to the left of my property and see a huge commercial structure.

I have a concern for the value of the property my husband and I purchased in 2005. Have you considered the impact to the persons/families who own homes in the area? Better still - I bet you would not desire to live where I live under the proposed circumstances. Our homes will be more visible to persons who will frequent the area to shop the Costco. Security is a concern for all of the families in our subdivision.

I90-1

# Letter I90 Robin Snowden

August 17, 2023

**Response I90-1**

The comment expresses opposition to the proposed project and raises concerns related to several topics discussed in detail below.

The comment raises concerns related to aesthetics and lighting. Section 3.1, "Aesthetics," of the Draft EIR includes an analysis related to these topics. As explained in the Draft EIR, the City analyzed both the potential for degradation of views of the site and potential for conflict with applicable regulations that govern scenic quality; private views from personal residences are not evaluated pursuant to CEQA. The Draft EIR determined that these impacts would be less than significant. As described in Impact 3.1-1 (page 3.1-8):

> Implementation of the project would alter views by adding built-environment elements on a vacant parcel, but would not substantially degrade existing views of the project site or the surrounding areas. Elements of the project's design (such as building height, color, massing, architectural detailing, landscaping, and setback requirements) would be consistent in visual character with the surrounding development, and consistent with applicable regulations pertaining to aesthetics. These established standards would result in a development that would not detract from or degrade the existing visual character or quality of public views of the site and its surroundings.

As discussed on page 3.1-9 (Impact 3.1-2), all light fixtures would be downcast and would not exceed the City's 0.5-foot-candle standard for light spillover onto adjacent residential areas. The Draft EIR concluded that the project's impact related to lighting would be less than significant.

The comment raises concerns related to traffic and pedestrian safety. Section 3.13, "Transportation and Circulation," of the Draft EIR includes an analysis related to these topics. This comment is similar to Comment I4-1 and I5-1. Please refer to Responses I4-1 and I5-1 for a discussion regarding the proposed project's impacts related to transportation, including safety hazards.

The comment also raises concerns related to property values and security. As discussed in Response I4-2, CEQA requires lead agencies to consider the effects of a proposed project on the physical environment. The proposed project's economic and social effects on in the vicinity of the project site is not, in and of itself, a significant impact under CEQA. The potential for indirect environmental impacts to occur as a result of the proposed project's contribution to social or economic changes in the project vicinity is addressed in Response I10-1. An evaluation of the potential for the Costco relocation and gas station to result in urban decay impacts was conducted by ALH Urban and Regional Economics in 2023. This analysis concludes that the proposed Costco Commercial Center is not anticipated to cause or contribute to conditions of urban decay in the City of Fresno (see Appendix A).

The comment does not offer any specific concern related to the adequacy of the Draft EIR; therefore, no revisions to the Draft EIR are necessary in response to this comment. The comment is included in the record, which will be considered by the decision makers in their deliberations over potential approval of the proposed project.

Costco

Letter I91

Shauna Sandin <ssandin1990@gmail.com>

Fri 8/18/2023 9:46 AM

To:Jose Valenzuela <Jose.Valenzuela@fresno.gov>;

External Email: Use caution with links and attachments

Hello. My name is Shauna Sandin. I have lived in this area of Fresno pretty much my whole life. Since 1998, we have lived at 5649 n Iola 93722. I had my daughter in 2011, and she has grown up at this same address. She is in 7th grade at Rio Vista. We have watched the drastic changes in our area over the last few years and we have just went along with things. But this Costco, in its plans as of now, are just too much. There is an empty area right over the railroad tracks, where there used to be an Arco and Taco Bell. I believe this would be a space better suited to a construction project of that magnitude. The corner off of Herndon is too close to Rio Vista, and there will be many kids making their way to school from the neighborhood who will cut through the huge parking lot. It just seems like an unsafe area to put it in. I believe there are many other areas besides that residential corner to put a huge business like Costco. I'm hoping they reconsider. I91-1

## Letter I91 Shauna Sandin

August 18, 2023

Response I91-1

The comment expresses opposition to the location of the proposed project and suggests an alternative location based on anticipated traffic. Please refer to Response I4-1 related to the discussion of traffic in CEQA documents.

The comment identifies an area "over the railroad tracks" as a potential alternative project site. The exact location is unclear; however, this area is currently under development for the California Highspeed Rail and may not be a feasible location for the project. Moreover, as explained in Response I37-1, the City is not obligated to evaluate alternatives that would reduce traffic impacts because generating traffic is not an impact under CEQA. The comment does not provide evidence to support the conclusion that developing the proposed project at an alternative location would avoid or substantially lessen any of the significant effects of the proposed project; therefore, there is no basis for considering such alternatives in the Draft EIR. In addition, the comment does not offer any specific concern related to the adequacy of the Draft EIR; therefore, no revisions to the Draft EIR are necessary in response to this comment. The comment is included in the record, which will be considered by the decision makers in their deliberations over potential approval of the proposed project.

# Costco Opposition

Letter I92

c y <ccyuvienco@hotmail.com>

Sat 8/19/2023 7:35 PM

To:Jose Valenzuela <Jose.Valenzuela@fresno.gov>;

**External Email:** Use caution with links and attachments

Subject: Opposition to the Construction of Costco in Our Neighborhood

Dear Mr. Valenzuela,

I hope this letter finds you well. I am writing to express my deep concern and opposition to the proposed construction of a Costco store in our neighborhood. I believe that such a development would have numerous negative impacts on our community, both socially and environmentally. I kindly request that you reconsider this decision based on the following. I92-1

1. Environmental Impact:
The construction of a Costco store in our neighborhood could have severe environmental consequences. It would likely result in increased traffic congestion, pollution, and noise levels due to the significant influx of customers and delivery trucks. Additionally, the loss of green spaces and potential harm to local ecosystems should be taken into consideration. I92-2

2. Traffic and Infrastructure:
Our neighborhood's infrastructure is not designed to accommodate the influx of vehicles that a large retail establishment like Costco would attract. This would lead to increased strain on our roads, potentially contributing to accidents, longer commutes, and reduced safety for residents, especially pedestrians and cyclists. Insufficient parking facilities may also exacerbate traffic issues in our already congested area. I92-3

3. Local Businesses:
The presence of a massive chain retailer like Costco could pose a threat to small, locally owned businesses in our community. These businesses contribute to the unique character of our neighborhood and provide personalized services that Costco may not be able to offer. The establishment of a Costco could result in job losses and economic hardship for local entrepreneurs who play an integral role in our economy. I92-4

4. Quality of Life:
Our neighborhood is characterized by a close-knit community, where residents value peace and tranquility. The addition of a large-scale commercial development like Costco may disrupt this harmony by leading to increased noise and disturbances. Additionally, the presence of such a store might attract a high volume of transient shoppers who lack personal investment in our community. I92-5

In light of these concerns, I kindly request that you reconsider the decision to construct a Costco store in our neighborhood. I believe that maintaining the integrity and well-being of our community should take precedence over corporate interests. Exploring alternative locations that would have a lesser impact on the environment and community cohesion should be thoroughly considered.

I genuinely appreciate your attention to this matter and your understanding of our community's concerns. Should you require any further information or wish to discuss this issue in more detail, please do not hesitate to contact me at the provided contact details. I hope that our collective voices can contribute to a thoughtful decision-making process. I92-6

Thank you for your time and consideration.
Respectfully,
Charles Yuvienco

## Letter I92 Charles Yuvienco

August 19, 2023

Response I92-1

The comment expresses opposition to the project and states that the project would result in negative social and environmental impacts. This comment does not identify specific issues related to the adequacy of the Draft EIR. Specific concerns expressed by the commenter are addressed in Responses I92-2 through I92-6.

Response I92-2
The comment states that the proposed project would result in environmental consequences, including traffic congestion, pollution, noise levels, loss of green space, and harm to local ecosystems. Section 3.3, "Air Quality," Section 3.5, "Biological Resources," Section 3.9, "Hydrology and Water Quality," Section 3.12, "Public Services and Recreation," and Section 3.13, "Transportation and Circulation," of the Draft EIR include analyses related to these topics. The comment does not offer any specific concern related to the adequacy of the Draft EIR; therefore, no revisions to the Draft EIR are necessary in response to this comment. The comment is included in the record, which will be considered by the decision makers in their deliberations over potential approval of the proposed project.

Response I92-3
The comment states that the proposed project would exacerbate traffic issues on local roadways. Although the topic of traffic congestion is a factor for consideration by the decision-makers in acting on the proposed project, pursuant to CCR Section 15064.3, automobile delay and similar metrics relating to vehicular roadway capacity and traffic congestion are not considered a significant impact on the environment under CEQA. Please refer to Response I4-1 for a discussion regarding the proposed project's impacts related to transportation. As explained further in Response I5-1, pedestrian mobility in the vicinity may be improved through development of the project because it includes connections to planned pedestrian infrastructure. The comment does not offer any specific concern related to the adequacy of the Draft EIR; therefore, no revisions to the Draft EIR are necessary in response to this comment. The comment is included in the record, which will be considered by the decision makers in their deliberations over potential approval of the proposed project.

Response I92-4
The comment speculates that the proposed project would threaten local businesses and result in economic hardship. This comment is similar to Comment I10-1. Please refer to Response I10-1 for a discussion regarding the proposed project's impacts related to the proposed project's contribution to economic effects. No revisions to the Draft EIR are necessary in response to this comment. The comment is included in the record, which will be considered by the decision makers in their deliberations over potential approval of the proposed project.

Response I92-5
The comment states that the project would disrupt quality of life within the neighborhood, raising environmental concerns related to noise. Section 3.11, "Noise and Vibration," of the Draft EIR includes an analysis related to this topic. This comment is similar to Comment I30-1. Please refer to Response I30-1 for a discussion related to the project's impact related to noise.

The comment also raises concerns related to community disturbance. As discussed in Response I4-2, CEQA requires lead agencies to consider the effects of a proposed project on the physical environment. The proposed project's social effects on neighborhoods in the vicinity of the project site is not, in and of itself, a significant impact under CEQA. However, the Draft EIR evaluates physical environmental effects that may indirectly relate to this topic. For example, Section 3.1, "Aesthetics," evaluates potential impacts related to changes in visual character and quality of the project site and surroundings and Section 3.10, "Land Use and Planning," evaluates potential impacts related to the physical division of existing communities.

The comment does not offer any specific concern related to the adequacy of the Draft EIR; therefore, no revisions to the Draft EIR are necessary in response to this comment. The comment is included in the record, which will be considered by the decision makers in their deliberations over potential approval of the proposed project.

Response I92-6
The comment provides closing remarks and suggests that alternative locations be considered. This comment is similar to Comment I37-1. Please refer to Response I37-1 for a discussion related to alternative locations. The comment does not provide evidence to support the conclusion that developing the proposed project at an alternative location would avoid or substantially lessen any of the significant effects of the proposed project. In addition, the comment does not offer any specific concern related to the adequacy of the Draft EIR; therefore, no revisions to the Draft EIR are necessary in response to this comment. The comment is included in the record, which will be considered by the decision makers in their deliberations over potential approval of the proposed project.

costco on herndon and riverside.

Letter I93

Darius Assemi <DAssemi@gvhomes.com>

Mon 8/21/2023 4:26 PM

To:Jose Valenzuela <Jose.Valenzuela@fresno.gov>;

Cc:Becky Wharton <becky.wharton@gvhomes.com>;

**External Email:** Use caution with links and attachments

Jose Valenzuela, Planner III
Planning and Development Department
2600 Fresno Street, Room 3065
Fresno, CA 93721

Dear Jose,

I am the owner of the 14 acre multi-family project(under construction ) across the street from the future Costco and welcome the choice of shopping it brings to northwest Fresno residents. I am confident the environmental document and the approval process the city has will address the concerns from residents. Not every one will be happy. but overall this will be a great addition to north west Fresno.
And as a city we need the tax base.

I urge an approval of this project by the governing bodies.

I93-1

**Thank you,**

**Darius Assemi**
**Granville Homes I gvhomes.com**
P: 559.436.0900

## Letter I93 Darius Assemi

August 21, 2023

Response I93-1

The comment expresses support for the proposed project. This comment does not address the adequacy of the Draft EIR analysis; therefore, no revisions to the Draft EIR are necessary in response to this comment. The comment is included in the record, which will be considered by the decision makers in their deliberations over potential approval of the proposed project.

Proposed Costco Location

Letter I94

Noel Delgado <ngd1@att.net>

Mon 8/21/2023 6:58 PM

To:Jose Valenzuela <Jose.Valenzuela@fresno.gov>;

**External Email:** Use caution with links and attachments

Mr. Valenzuela

I am a 12 year resident in Northwest Fresno and reside in the area of Polk and Herndon. When my wife and I purchased our home , the area was fairly quiet with most traffic coming through just to get to the 99. Over the last 10 years there has been significant growth in the area and with that more traffic, graffiti, homeless, etc. Even before the growth there was a traffic issue especially with the railroad at Golden State and Herndon.

The proposed new site is supposedly due to the current traffic situation at the Costco's current Shaw location. How is building the"world's largest Costco" at this location going to be any better? The Marketplace at El Paseo already generates a very significant amount of traffic in the area. There are schools right up the street and many residences also next to the proposed sight not to mention the beautiful golf course as well. This a safety and traffic issue and a Costco does not belong in the area. In my opinion as a resident that travels down Herndon every single day, the proper infrastructure is not in place for such a business to be built. The proposed site is not a solution to their "traffic" problem, all it does is push the problem further north into an already busy and increasingly congested area where kids go to school and families live. I'm all for the growth of our community but this proposed new business site is not the appropriate location for such a large project. Thank you for your time and allowing me to voice my concerns.

I94-1

Very respectfully,
Noel Delgado

Sent from AT&T Yahoo Mail for iPad

## Letter I94 Noel Delgado

August 21, 2023

Response I94-1

The comment expresses opposition to the location for the proposed project, raising concerns related to traffic and safety. This comment is similar to Comments I4-1 and I5-1. Please refer to Responses I4-1 and I5-1 for a discussion regarding the proposed project's impacts related to transportation, including safety hazards. This comment does not offer any specific concern related to the adequacy of the Draft EIR; therefore, no revisions to the Draft EIR are necessary in response to this comment. The comment is included in the record, which will be considered by the decision makers in their deliberations over potential approval of the proposed project.

Traffic pattern for Costco

Letter I95

Ray Gonzales <raygonzales46@icloud.com>

Thu 8/24/2023 4:31 PM

To:Jose Valenzuela <Jose.Valenzuela@fresno.gov>;

External Email: Use caution with links and attachments

I live adjacent to the Riverside Golf Course and I am interested in what the traffic pattern will be pertaining to Spruce and Hayes Avenues. Thank you for your time. I95-1

Sent from my iPhone

## Letter I95 Ray Gonzales

August 24, 2023

Response I95-1

The comment requests information about the traffic patterns on West Spruce and Hayes Avenues. Pages 2-13 and 2-14 of the Draft EIR include a description of site access and circulation relative to the proposed project. The proposed project would result in the extension of West Spruce Avenue from North Riverside Drive to the intersection with North Sandrini Avenue, which would consist of an asphalt roadway with curb, gutter, sidewalk, Class II bicycle facilities, and streetlights. The proposed project would not result in improvements on Hayes Avenue itself, but is proposing to reclassify a portion of West Herndon Avenue between north Riverside Drive and North Hayes Avenue from expressway to superarterial. The proposed reclassification would allow the construction of an intersection where West Herndon Avenue meets the private North Arthur Avenue right-of-way. This comment does not address the adequacy of the Draft EIR analysis; therefore, no revisions to the Draft EIR are necessary in response to this comment. The comment is included in the record, which will be considered by the decision makers in their deliberations over potential approval of the proposed project.

Costco concerns

Letter I96

Jennifer Airheart <jairheart22@icloud.com>

Thu 8/24/2023 6:43 PM

To:Jose Valenzuela <Jose.Valenzuela@fresno.gov>;

External Email: Use caution with links and attachments

Hi,
I am a neighbor of the new proposed Costco.
I have concerns about additional traffic delays, gas smells from the pumps, and gas station staying open so late. The shopping center has increased the traffic greatly. I do not believe there is enough room next to golf course. I do not want it exiting on Polk. I96-1

Thank you for your efforts to help homeowners in this area

## Letter I96 Jennifer Airheart

August 24, 2023

Response I96-1

The comment expresses concerns related to traffic delay and odors from operation of the gas station. Although the topic of traffic congestion is a factor for consideration by the decision-makers in acting on the proposed project, pursuant to CCR Section 15064.3, automobile delay and similar metrics relating to vehicular roadway capacity and traffic congestion are not considered a significant impact on the environment under CEQA. Please refer to Responses I4-1 for further discussion regarding the proposed project's impacts related to transportation.

Regarding odor from operation of the proposed gas station, the Draft EIR (Impact 3.3-5) concludes that this potential impact would be less than significant because "odors from gasoline and diesel fuel transfer would be concentrated on the site." Fuel pumps "are not considered significant sources of odor to nearby receptors due to the high dissipation rates of benzene, the chemical component of gasoline associated with its notable odor. Additionally, SJVAPCD's Rule 4622 would limit emissions of gasoline vapors from the transfer of gasoline into motor vehicle tanks, which would also serve to reduce odors from gasoline dispensing." The comment also expresses concerns about operating hours and, but does not identify any specific environmental issues.

This comment does not offer any specific concern related to the adequacy of the Draft EIR; therefore, no revisions to the Draft EIR are necessary in response to this comment. The comment is included in the record, which will be considered by the decision makers in their deliberations over potential approval of the proposed project.

# Costco Public Comment

Letter I97

Amy Zehring <amy_zehring@att.net>

Fri 8/25/2023 7:47 AM

To:Jose Valenzuela <Jose.Valenzuela@fresno.gov>;

**External Email**: Use caution with links and attachments

It is time for Fresno to start making major planning decisions that don't increase VMT. Saying increased VMT is "unavoidable" is lazy. Reducing VMT in an area that is highly car-centric will be difficult, but it can be done.

Shopping in bulk does not necessarily require a car. It does require streets that are welcoming to other modes of transportation, such as bicycles. Fresno does not need more gas stations and car washes. Fresno does not need the air pollution and noise pollution that this giant Costco will bring.

Since the current plan for the Costco project is highly car-centric and does not significantly reduce VMT by making surrounding roads bicycle and pedestrian friendly to Costco members, the project needs to go back to the drawing board. The project should not be approved in its current state. VMT MUST BE REDUCED.

I97-1

Sincerely,

Amy Zehring

## Letter I97 Amy Zehring

August 25, 2023

**Response I97-1**

The comment expresses concerns related to the significant and unavoidable impact related to project-generated VMT. Further, as discussed on pages 3.13-15 through 3.13-18, the Draft EIR considered all applicable and feasible measures to reduce project-generated VMT from the most recent California Air Pollution Control Officers Association *Handbook for Analyzing GHG Emission Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equity*. The proposed project includes mitigation to reduce VMT associated with employee commutes (Mitigation Measure 3.13-2); however, the primary source of the proposed project's daily VMT is warehouse shopping by Costco members. As noted on page 3.13-18 of the Draft EIR, the nature of Costco's land use and business model is auto-oriented. Members purchase items in bulk at Costco facilities, making walking, biking, or transit trips to the warehouse impractical for many. Therefore, the Draft EIR determined that no additional feasible mitigation measures are available to reduce the proposed project's VMT impact to a less-than-significant level. As discussed in Response I4-1, CEQA does not preclude a public agency from approving or carrying out a project that has potential to result in significant and unavoidable impacts on the environment; however, the public agency must make findings for each impact and issue a statement of overriding considerations in order to approve the project. Further, although the proposed Costco relocation is anticipated to result in increased VMT, the project includes pedestrian infrastructure and trail connections that are anticipated to support reduced VMT in the area. For further discussion of project attributes that support VMT reduction, refer to Response O1-3 and Response I5-1.

The comment also raises concerns related to air pollution and noise. Section 3.3, "Air Quality," and Section 3.11, "Noise and Vibration," of the Draft EIR include an analysis related to these topics. Please refer to Response I5-1 for a discussion regarding the proposed project's impacts related to air quality and Response I30-1 for a discussion regarding the proposed project's impacts related to noise.

This comment does not offer any specific concern related to the adequacy of the Draft EIR; therefore, no revisions to the Draft EIR are necessary in response to this comment. The comment is included in the record, which will be considered by the decision makers in their deliberations over potential approval of the proposed project.

Letter I98

Jose Valenzuela, Fresno Supervising Planner

2600 Fresno Street, Room 3043

Fresno, CA 93721

August 24, 2023

Good Afternoon Mr. Valenzuela,

We are homeowners in the development just west of Riverside Golf Course; the main access to our home is via Riverside Drive and we have many concerns about the proposed Costco store at Herndon and Riverside Drive.

Our main concern is, of course, traffic. Right now, the only access point to our location is Riverside Drive (a two lane road) or Thiele Avenue, which you must maneuver through neighborhoods to access. Obviously, there's no access from the north as the housing development is against the river bluff. Even now, when there is a train, Herndon becomes backed up so far back that if emergency services needed to access our neighborhood, they would be unable to drive there. The massive increase in traffic from this proposed giant Costco would likely set that entire area in a gridlock even when there is no train.

We realize the new Veteran's Boulevard access from the south could potentially ease some of the Herndon congestion, but that has yet to be proven since it's not complete yet. I realize as well there are talks of opening Spruce Avenue to go all the way through along the southern edge of the golf course.

The plan states that Costco intends to position their 32 proposed fuel pumps and car wash along the northern edge of the property, this will cause large amounts of traffic on Spruce Avenue for those seeking fuel from Costco and would likely negate additional access to the neighborhood.

This proposed Costco development with 889 parking spaces and 32 gas pumps (conservatively 64-100 cars waiting for fuel at any given time, decreasing the quality of the air) would not only increase traffic but there's also concerns about the transport truck traffic as well as an increase in the homeless population that congregates around every Costco.

The northwest corner of Riverside Drive and Spruce Avenue contains a school bus stop and just across Herndon is an Elementary School and a Middle School. All this increased traffic equates to additional danger for the children in the neighborhood.

I98-1

We realize the city council would like to see the increased number of jobs this store will create - but how many more jobs really if everyone from the Shaw location comes to the new store? Everyone in our neighborhood is also concerned about a potential decrease in property values from the impact of this proposed Costco. We were under the impression that the corner would be developed with houses, as was the case with the west side of Riverside Drive. It's likely that this Costco wasn't in the works nine years ago when we purchased our property, had we known it was even a possibility, we would have looked elsewhere.

I98-2

It seems the ideal Costco (or any giant size store) location would be on a site that has access from all sides and does not hinder access to a specific neighborhood (much like the Costco in Hanford). Until the traffic benefit from the Veterans Blvd overpass/onramp is known, it seems reckless to proceed with a business of this size in a neighborhood that has compromised access to begin with.

I98-3

Thank you for your time,

Brian & Sherryl Kellogg

# Letter I98 Brian and Sherryl Kellogg

August 24, 2023

**Response I98-1**

The comment expresses concerns related to traffic, circulation, access, pedestrian safety, and unhoused populations. Please refer to Responses I4-1 and I5-1 regarding transportation and pedestrian safety and unhoused populations, and Response I32-1 regarding site access and circulation. This comment does not offer any specific concern related to the adequacy of the Draft EIR; therefore, no revisions to the Draft EIR are necessary in response to this comment. The comment is included in the record, which will be considered by the decision makers in their deliberations over potential approval of the proposed project.

**Response I98-2**

The comment requests information regarding the number of jobs the proposed project would create. As stated on page 1-5 of the Draft EIR, the project would not create new employment positions because it is assumed that the employees working at the existing Costco facility would relocate to the new facility.

The comment also expresses concerns that the project site would not be developed with residential land uses. As noted on page 3.10-3 of the Draft EIR, the existing City of Fresno General Plan designation for the project site is Community Commercial (CC), which allows for a variety of commercial facilities including medium-scale retail, office, civic and entertainment uses, supermarkets, drug stores, and supporting uses. The project site is zoned CC/EA/UGM/cz, which allows for the development of medium-scale retail, office, civic and entertainment uses, supermarkets, drug stores, and supporting uses. Section 3.10, "Land Use and Planning," of the Draft EIR includes an analysis related to the topic of land use. As discussed on pages 3.10-5 through 3.10-7 of the Draft EIR, a general plan amendment, rezone, and conditional use permit would be needed to ensure that the proposed project is consistent with the land use and zoning for the project site. The Draft EIR concludes that the proposed general plan amendment and zoning change would not conflict with City policies adopted for the purposes of avoiding or mitigating an environmental effect and the impact would be less than significant (Impact 3.10-1).

The comment also expresses concerns related to property values. The proposed project's effects on property values in the vicinity of the project site is not, in and of itself, a significant impact under CEQA. The potential for indirect environmental impacts to occur as a result of the proposed project's contribution to social or economic changes in the project vicinity is addressed in Response I10-1.

This comment does not offer any specific concern related to the adequacy of the Draft EIR; therefore, no revisions to the Draft EIR are necessary in response to this comment. The comment is included in the record, which will be considered by the decision makers in their deliberations over potential approval of the proposed project.

**Response I98-3**

The comment summarizes concerns previously stated in Comment I98-1 related to traffic and access. Refer to Response I98-1.

Letter
I99

TO: Jose Valenzuela, City of Fresno Planning Department
FROM: Rodger B. Jensen, Jenco Farms, LP
RE: Comments on the draft EIR concerning the proposed Costco Commercial Development
DATE: August 25, 2023

Mr. Valenzuela, Jenco Farms, LP is the owner of the land on which the proposed Costco development would be located on the northwest corner of Riverside Drive and Herndon Avenue. Since 1941, this parcel has been owned by family members of the partners of Jenco Farms, LP. For many years, the family farmed a fig orchard on this site until the trees were removed decades ago. Since that time, the land has been open and unused.

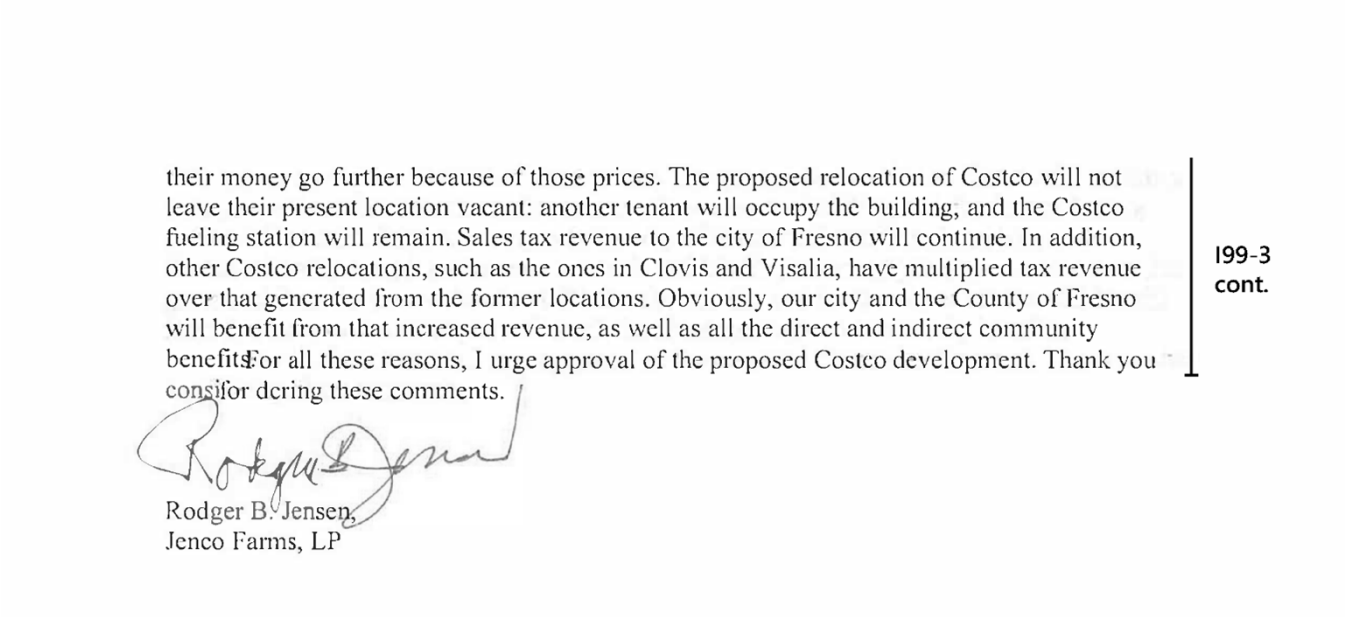
The property, which is east of the Herndon townsite, was originally zoned for agricultural uses. When that zoning designation was changed to accommodate urban use, it was then designated for commercial and/or industrial uses, as were other areas in that townsite and south thereof along Highway 99 and the adjacent railroad tracks. For decades and long before the current urban uses, the site of the proposed Costco commercial development has been planned to accommodate intensive non-residential uses. The fact of that commercial/industrial designation has been known (or at least available to) to the public, including purchasers of property for any use in the vicinity of the Herndon townsite. That history should be taken into account when considering the objections of some to this development. I99-1

Veterans Boulevard is now a reality, but it, too, has been "on the books" for approximately 40 years. That roadway was designed to direct traffic to Herndon Avenue east of the proposed development site via an overpass that avoids conflict with rail traffic and also with vehicular traffic coming west-bound along Herndon Avenue and east-bound to and along it under Highway 99. This new route avoids both those causes of current congestion. As a result, vehicle traffic passing through the intersection of Herndon Avenue and Riverside Drive will be greatly reduced. The Bullard Plan, which has been cited in conversations with senior city staff, predicts that such reduction will cut the trips by approximately 50%. Further reductions would occur by allowing access to this proposed site from Herndon Avenue between Hayes Avenue and Riverside Drive. Those total reductions should also be taken into account when considering the objections of some to the Costco proposal.

The draft EIR for the proposed Costco project addresses traffic concerns and analyzes future traffic patterns. The measures that Costco intends to take will reflect the impact of completing the Veterans Boulevard and other traffic routings that spread traffic flow to avoid congestion at several access points. Having alternative routes will smooth and expedite the flow of that traffic. I99-2

While the portion of the draft EIR concerning that flow of traffic is particularly useful and complete, the other parts of that EIR are also highly informative. Taken as a whole, the draft EIR is detailed, extensive and comprehensive. It is more than adequate in describing and analyzing potential negative impacts of the project, as well as noting effective mitigation measures.

Finally, the economic consequences of relocating Costco operations in Fresno, instead of elsewhere, are clearly favorable. Obviously, Costco members here and in nearby communities will benefit from being able to come to a modern, convenient, and well-planned site with ample access and efficient parking along with pleasant landscaping. When those members shop at a new and more appealing location, they benefit from the savings they enjoy when purchasing items at discounted prices. Those members, in effect, are able at least to resist inflation by having I99-3



their money go further because of those prices. The proposed relocation of Costco will not leave their present location vacant: another tenant will occupy the building, and the Costco fueling station will remain. Sales tax revenue to the city of Fresno will continue. In addition, other Costco relocations, such as the ones in Clovis and Visalia, have multiplied tax revenue over that generated from the former locations. Obviously, our city and the County of Fresno will benefit from that increased revenue, as well as all the direct and indirect community benefits. For all these reasons, I urge approval of the proposed Costco development. Thank you for considering these comments.

I99-3 cont.

Rodger B. Jensen,
Jenco Farms, LP

## Letter I99 Rodger B. Jensen

August 25, 2023

Response I99-1

The comment provides a description of the history of the project site, including previous land use designations and zoning, and states that the history of the site should be taken into account. This comment does not address the adequacy of the Draft EIR analysis; therefore, no revisions to the Draft EIR are necessary in response to this comment. The comment is included in the record, which will be considered by the decision makers in their deliberations over potential approval of the proposed project.

Response I99-2

The comment describes transportation improvements that are projected to reduce vehicle traffic in the project vicinity. The comment also states that the Draft EIR provides adequate analysis regarding project-generated traffic and provides effective mitigation measures. No revisions to the Draft EIR are necessary in response to this comment. The comment is included in the record, which will be considered by the decision makers in their deliberations over potential approval of the proposed project.

Response I99-3

The comment expresses support for the proposed project and states that the proposed project would result in benefits to the local economy and nearby communities. This comment does not address the adequacy of the Draft EIR analysis; therefore, no revisions to the Draft EIR are necessary in response to this comment. The comment is included in the record, which will be considered by the decision makers in their deliberations over potential approval of the proposed project.

Letter I100

**From:** Planning
**To:** Jose Valenzuela
**Subject:** FW: Worlds largest COSTCO
**Date:** Monday, August 28, 2023 10:58:33 AM

Jose Quijano | Senior Administrative Clerk
Current Planning | Planning & Development
2600 Fresno Street | Fresno CA 93721
559.621.8767
Jose.Quijano@Fresno.gov

Resources: Planning & Development | GIS Data Hub – Interactive Zoning Map | Fresno Municipal Code
Accela Citizens Access (ACA) Online Plans/Permits/Inspections | ACA Instruction Videos

-----Original Message-----
From: James Fleck <jfleck5@icloud.com>
Sent: Monday, August 28, 2023 10:29 AM
To: Planning <Planning@fresno.gov>
Subject: Worlds largest COSTCO

External Email: Use caution with links and attachments

I would like to express my concern about the proposed development of a COSTCO in NW Fresno. The traffic congestion in the proposed area is already is already terrible most of the day especially during "rush hours". A COSTCO warehouse could only increase traffic with trucks and automobiles. Environmentally, it would increase air pollution from auto congestion, along with noise and light pollution. If the City of Fresno is trying to rehabilitate areas of Fresno then why not locate a new store in areas where the residents can have access to a discount store? I100-1
Thank You for your consideration,
James Fleck a 73yr resident of NW Fresno.

Sent from my iPhone

## Letter I100 James Fleck

August 28, 2023

Response I100-1

The comment expresses opposition to the location for the proposed project, raising concerns related to traffic, air pollution, noise, and light pollution. Although the topic of traffic congestion is a factor for consideration by the decision-makers in acting on the proposed project, pursuant to CCR Section 15064.3, automobile delay and similar metrics relating to vehicular roadway capacity and traffic congestion are not considered a significant impact on the environment under CEQA. Please refer to Response I4-1 for a discussion regarding the proposed project's impacts related to transportation, Response I5-1 for a discussion regarding the proposed project's impacts related to air quality, and Response I30-1 for a discussion regarding the proposed project's impacts related to noise and lighting. This comment does not offer any specific concern related to the adequacy of the Draft EIR; therefore, no revisions to the Draft EIR are necessary in response to this comment. The comment is included in the record, which will be considered by the decision makers in their deliberations over potential approval of the proposed project.

Letter I101

**From:** gabriel ledesma
**To:** Jose Valenzuela
**Subject:** Comments on Costco Commercial Center
**Date:** Monday, August 28, 2023 10:48:21 AM

**External Email:** Use caution with links and attachments

Good Morning, Jose–

I had a few questions and comments regarding the Costco Commercial Center.

I'm a resident of Fresno, CA, and am concerned about this project's impact to the San Joaquin River and the ferderally listed Spring-Run Chinook Salmon (*Oncorhynchus tshawytscha*). The project is close to FMFCD's stormwater basin, Basin "EG", which discharges to the San Joaquin River during rain storms. This project's stormwater may impact the San Joaquin River's quality. I101-1

Questions/Comments:

1. Will the project discharge any stormwater to Basin "EG" *during* or *after* construction? If so, can you change the language in the EIR to reflect this? For example, on page 3.9-7, the dEIR does not mention that Basin "EG" discharges to the SJR during rain events. I101-2

2. Also, on page 3.9-11, the dEIR mentions building a storm drain on Spruce Ave. Is this a storm drain that discharges to Basin "EH" or to Basin "EG"? It's an important distinction as Basin "EG" discharges to the SJR (see attached photo). I101-3

3. If the project will discharge water to Basin "EG" during construction, the developer/owners will need to contact the Central Valley Regional Water Quality Control board and ask if they need to apply for Risk Level 2 coverage under the Construction General Permit. I101-4

4. If the project discharges stormwater to Basin "EG" *after* construction, then the developers/owners need to contact FMFCD and ask about FMFCD's post-development stormwater requirements. I101-5

The project's stormwater discharges to Basin "EG" may be small, but it's important to ask. As a resident of Fresno, it's very important that we protect our local natural resources, especially those as sensitive and unique as the San Joaquin River and the Chinook Salmon. There are multiple federally-listed and special status species in the SJR, so it's important to note these potential impacts in this project's EIR. Especially for a project this large and with so many potential pollutant sources (car wash, gas station, loading docks, and increase traffic). I101-6

Feel free to contact me if you have any questions.

Thank you,

Gabriel Ledesma

## Letter I101 Gabriel Ledesma

August 28, 2023

**Response I101-1**

The comment notes that the project site is near FMFCD's Basin EG. Basing EG is an existing basin of approximately 7 acres that is located northeast of the project site, north of Spruce Avenue and east of Riverside Golf Course. Because Basin EG discharges into the San Joaquin River, the comment indicates that stormwater from the project site has the potential to affect water quality in the San Joaquin River and federally listed Spring-Run Chinook Salmon (*Oncorhynchus tshawytscha*). As explained further in Response I101-2, the project site would not contribute substantial stormwater runoff to FMFCD's Basin EG.

**Response I101-2**

The comment asks whether stormwater from the project site would be discharged to FMFCD's Basin EG during or after construction. Referencing the description of the existing stormwater infrastructure in Section 3.8, "Hydrology and Water Quality," (page 3.9-7) the comment also requests update of the description of the EG drainage basin to reflect discharge into the San Joaquin River if the project would contribute stormwater to the basin.

The Draft EIR acknowledges that the FMFCD "system is designed to move water from a basin and discharge to other FMFCD facilities, or to irrigation canals, creeks, and the San Joaquin River" (page 3.9-6). Further, as explained in Impact 3.9-1 (page 3.9-9) of the Draft EIR, "the project would be designed in a matter consistent with FMFCD's Storm Drainage and Flood Control Master Plan." As part of the Spruce Avenue extension that would be constructed to complete the City's planned transportation infrastructure, an inlet that would connect to Basin EG would be constructed northeast of the project site. This inlet is shown in the Storm Drainage and Flood Control Master Plan and was identified as a necessary infrastructure improvement in early consultation with FMFCD. This inlet would serve the transportation infrastructure but would not convey stormwater drainage from the project site.

As described on page 3.9-6 of the draft EIR, "[t]he project site is located within the EH local stormwater drainage area." Stormwater from the project site would be conveyed to the west and would not contribute runoff to Basin EG. Therefore, the draft EIR does disclose the connectivity of the FMFCD system to the San Joaquin River and explains that the project would not contribute stormwater to Basin EG. For these reasons, no revisions have been made to the draft EIR in response to this comment.

**Response I101-3**

The comment notes that storm drainage infrastructure would be constructed in conjunction with the Spruce Avenue extension from North Arthur Avenue west to North Riverside Avenue. As explained above and in the Draft EIR, the project site and all development west of North Arther Avenue "would be directed to existing FMFCD drainage facilities in North Riverside Drive, West Spruce Avenue, and West Herndon Avenue, located within the EH local stormwater drainage area" (see Draft EIR page 3.9-11) while the "area east of North Arthur Avenue is in the EG basin and drainage is directed to Spruce Avenue (Chapman, pers. comm., 2021)" (Draft EIR pages 3.9-6 and 3.9-7). An inlet would be constructed as part of the extension of Spruce Road that would convey stormwater from the area east of North Arther Avenue to Basin EG.

**Response I101-4**

The comment suggests that the City contact the Central Valley Regional Water Quality Control Board if the project would result in runoff to Basin EG during construction. As explained in Section 3.8, "Hydrology and Water Quality" (page 3.9-8), "earth-disturbing activities during construction would be subject to the NPDES Permit Program, administered by the Central Valley RWQCB. As required by NPDES, the project would be required to obtain coverage under the General Permit for Discharges of Storm Water Associated with Construction Activity (Construction General Permit Order 2009-0009-DWQ)." The Construction General Permit requires development and implementation of a stormwater pollution prevention plan and best management practices such as maintaining or creating drainages to convey and direct surface runoff away from bare areas, and installing physical barriers such as berms, silt fencing, waddles, straw bales, and gabions. Risk level is determined as part of this process; it is calculated based on location

and soil conditions and effects monitoring and reporting requirements. No revision to the Draft EIR is required in response to this comment.

Response I101-5

The comment suggests that the City contact FMFCD about post-development requirements if the project would result in runoff to Basin EG after construction. The City engaged with FMFCD early in the environmental review process and has included the inlet to Basin EG at the express request of FMFCD, which indicated that existing and planned infrastructure have been designed to serve buildout of this area. The City of Fresno, FMFCD, Fresno County, the City of Clovis, and California State University Fresno are covered under the region-wide Central Valley RWQCB General Permit for Stormwater Discharges from MS4s (Order R5-2016-0040). This Region-wide MS4 Permit requires that the City and its co-permittees implement water quality and watershed protection measures for all development projects. See Impact 3.9-1 (Draft EIR page 3.9-9) for further discussion.

As further explained in Section 3.14, "Utilities," (Draft EIR page 3.14-12) FMFCD's Post-Development Standards Technical Manual describes the stormwater management requirements for "Priority Projects," which includes commercial developments greater than 100,000 square feet, automotive repair shops, parking lots 5,000 square feet or greater with 25 or more parking spaces and potentially exposed to urban runoff, streets and roads; and retail gasoline outlets. All Priority Projects must mitigate the Stormwater Quality Design Volume or Stormwater Quality Design Flow through low-impact development or treatment-based stormwater quality best management practice or a combination thereof. The Draft EIR concludes that development of the proposed on-site stormwater facilities would adequately minimize the effect of the additional impervious area on peak runoff volumes and additional stormwater facilities would not be required.

Response I101-6

The comment provides conclusory remarks about the sensitivity of biological resources in the San Joaquin River and the importance of disclosing potential impacts. As described above in Responses I101-1 through I101-5, the project site would not discharge untreated stormwater runoff to the San Joaquin River via FMFCD's Basin EG. The project is not anticipated to impact aquatic species.

Letter I102

**From:** Jose Valenzuela
**To:** Jessica Babcock
**Subject:** FW: Against NW Costco
**Date:** Friday, September 1, 2023 10:34:49 AM

Jessica,

See comments from Lauryn Medina after the deadline.

Thank you,

**Jose Valenzuela | Supervising Planner**
Current Planning | Planning & Development
**2600 Fresno Street | Fresno CA 93721**
559.621.8070
**Jose.Valenzuela@Fresno.gov**

**From:** Lauryn Medina <lzm168@students.fresno.edu>
**Sent:** Thursday, August 31, 2023 11:35 PM
**To:** Jose Valenzuela <Jose.Valenzuela@fresno.gov>
**Subject:** Against NW Costco

**External Email:** Use caution with links and attachments

Dear Jose Valenzuela,

I hope this letter finds you well. I am writing to express my concerns regarding the proposed construction of a Costco store in our community and its potential negative impact on our schools and public health.

Firstly, I believe that building a Costco in our area may have a detrimental effect on our local schools and the health of the children. With increased traffic and congestion that often accompanies large retail stores, the safety of our children traveling to and from school could be compromised. Additionally, the noise and disruption caused by construction and ongoing operations of such a store could negatively affect the learning environment in nearby schools. I102-1

In addition, the traffic congestion caused by a Costco store may lead to increased air pollution, which can have adverse health effects on our residents, especially those with pre-existing respiratory conditions. The goal is the build an aquarium next to Herndon and 99 and the Riverside golf course. With the expansion of Veteran's Boulevard will increase traffic and will only get worst with the large Costco store. Respiratory conditions such as asthma, I102-2

emphysema, and chronic obstructive pulmonary disease (COPD). Children who go to school or visit the aquarium should not experience a respiratory exacerbation due to the increase in pollution. Individuals who play golf should not have to experience playing next to a large Costco building. Furthermore, the loose trash from the Costco building will end up in the San Joaquin River that is directly behind the proposed Costco. I102-2 cont.

I strongly believe that careful consideration should be given to the potential consequences of building a Costco store in our community. It is essential that we prioritize the well-being of our schools and the health of our residents. I urge you to thoroughly evaluate the impact of this proposal on our local education system and public health before making any decisions. I102-3

Thank you for your attention to this matter, and I hope that you will take these concerns into account as you deliberate on the future of our community.

Sincerely,

Lauryn Medina

Registered Nurse

## Letter I102 Lauryn Medina

September 1, 2023

Response I102-1

The comment expresses concerns related to traffic, congestion, safety, and noise. Section 3.11, "Noise and Vibration," and Section 3.13, "Transportation and Circulation," of the Draft EIR include analyses related to these topics. This comment is similar to Comments I4-1, I5-1, and I30-1. Please refer to Responses I4-1 and I5-1 for a discussion regarding the proposed project's impacts related to transportation and safety and Response I30-1 for a discussion regarding the project's impacts related to noise. This comment does not offer any specific concern related to the analysis and conclusions in the Draft EIR; therefore, no revisions to the Draft EIR are necessary in response to this comment. The comment is included in the record, which will be considered by the decision makers in their deliberations over potential approval of the proposed project.

Response I102-2

The comment expresses concerns related to air pollution and associated health effects. Section 3.3, "Air Quality," of the Draft EIR includes an analysis related to these topics. This comment is similar to Comment I5-1. Please refer to Response I5-1 for a discussion regarding the proposed project's impacts related to air quality. Further, health risks associated with construction and operation of the proposed project are summarized in Table 3.3-7 of the Draft EIR. The Draft EIR states that the proposed project would not expose receptors to a cancer risk or a noncancer chronic and acute hazard index above applicable thresholds established by the San Joaquin Valley Air Pollution Control District and concludes that the impact would be less than significant (Impact 3.3-3).

The comment also offers an opinion about the potential for the proposed project to generate "loose trash" that could end up in the San Joaquin River. The comment incorrectly characterizes the San Joaquin River as "directly behind the proposed Costco." The project site is approximately 0.35 mile south of the San Joaquin River; the Riverside Golf Course is located between the project site and the San Joaquin River.

This comment does not offer any specific concern related to the adequacy of the Draft EIR; therefore, no revisions to the Draft EIR are necessary in response to this comment. The comment is included in the record, which will be considered by the decision makers in their deliberations over potential approval of the proposed project.

Response I102-3

The comment summarizes concerns previously stated in Comments I102-1 and I102-2 related to public health. Refer to Responses I102-1 and I102-2.

Letter I103

Jose Valenzuela
Supervising Planner
City of Fresno
2600 Fresno Street, Third Floor, Room 3043
Fresno, CA 93721

**Subject: Costco Commercial Center Draft EIR (State Clearinghouse # 2021100443)**

Dear Mr. Valenzuela,

Presented in this letter are my comments on the Costco Commercial Center Draft EIR. The comments are organized into the following three overarching topic areas:

1) Comments regarding potential inconsistency between the operational characteristics identified in the proposed project description and the uses allowed by the proposed General Plan Amendment/Rezone.
2) Comments addressing issues and deficiencies in the analysis of specific categories of environmental effects – including Aesthetics, Biological Resources, Greenhouse Gas Emissions, Noise, and Transportation impacts.
3) Comments on the Draft EIR's Alternatives analysis.

As a brief prologue to these comments, I want to note that I am generally in favor of the development of a new Costco in northwest Fresno, but I have major reservations with the proposed project site location due to adverse environmental impacts that are specifically attributable to the site. My hope is that it is within the realm of possibility for Costco, the City, and community stakeholders to collaborate and find a viable alternative location that would substantially fulfill the objectives of the project while avoiding the significant costs (environmental and otherwise) that would result from development of the project at the subject location.

I103-1

Sincerely,

Daniel Brannick

1. ***Comments regarding potential inconsistency between the operational characteristics identified in the proposed project description and the uses allowed by the proposed General Plan Amendment/Rezone.***

   The comments here are focused on aspects primarily within the purview of the City of Fresno's Planning Department and are less directly focused on the analytical content presented in the Draft EIR. However, the information is nonetheless materially related to the analysis and may present the need for responses and/or revisions to the Draft EIR, such as in the Land Use and Planning section and the Alternatives analysis. (Note: Sections of the Citywide Development Code referenced for these comments are included as an attachment to the comment letter)

   The proposed Costco project includes a General Plan Amendment and Rezone, as a change from the existing Community Commercial/"CC" designations is necessary in order to allow development of

I103-2

the project to go forward. However, it appears that a major characteristic of the proposed project – the Market Delivery Operation (MDO) facility – would not be permissible either by-right or via CUP under the proposed General Plan and Zoning designations of General Commercial/"CG".

Section 2.2.2 of the Draft EIR (second paragraph of page 2-13) describes the MDO facility as follows:

> *In addition to the general sales floor, the southwest portion of the warehouse would contain an area for receiving, storing, and loading big and bulky items for Costco's home delivery program. This approximately 47,000-square-foot relocated market delivery operation (MDO) is a last-mile facility for delivery of large and bulky items and is not open to visitation by Costco members. At MDO facilities, large goods are dropped off, organized, and loaded for daily deliveries to Costco members' homes. Services would be the same scale as the existing program but would be consolidated into the proposed warehouse facility. The existing facility averages approximately 20 MDO trips per day and an average trip length of approximately 160 miles. In each trip, the box trucks typically make roughly 14 deliveries. It is anticipated that these trip characteristics would apply to the proposed MDO site.*

The proposed MDO facility appears to fall under the definition of what the Development Code defines as a "Warehousing, Storage, and Distribution" use (hereafter abbreviated as "WSD"). The Development Code contemplates several sub-types of WSD uses, which are defined in Section 15-6705 of the Development Code. It is also noteworthy that WSD uses are listed under the "Industrial Use Classifications" in 15-6705 rather than "Commercial Use Classifications" in 15-6704.

I103-2 cont.

In the Land Use Table for Commercial Districts (Development Code Section 15-1202), the only type of WSD use listed as a permitted or conditionally permitted use is "Personal Storage". Contrast this with the Land Use Table for Employment Districts (Development Code Section 15-1302) – a designation which includes business park and light industrial zone districts – which lists a number of WSD sub-types, including "Indoor Warehousing and Storage" and "Wholesaling and Distribution". Based on review of the definitions in Development Code 15-6705 and the project description presented in the EIR, the 47,000-square-foot MDO facility falls under one of these two use classifications, and neither of these types of WSD uses appears be allowed either by-right or through a CUP in any type of Commercial zone district.

The MDO facility also does not appear to fall under the Development Code's definition of an "Accessory Use" to the principal component of the project (in this case, the large-format retail use). Section 15-2703 states: "An accessory use shall be incidental, related, appropriate, and clearly subordinate to the principal use or building to which it relates; under the same regulations applied to the principal use in any zoning district; and where the accessory use does not alter the principal use." The MDO facility, while being integrated as part of the proposed Costco wholesale/retail building, would not be considered incidental or clearly subordinate to the principal use or building to which it relates; per DEIR Table 2-1, the MDO's footprint makes up over 25 percent of the functional building space and is more than double the size of the loading/back of house/storage/receiving area that would support the warehouse/retail operations. It also seems to materially alter the principal large-format retail use because the proposed project site would function more as a hybrid logistics/fulfillment hub than comparable large-format retail stores.

In the process of reviewing the Development Code and trying to ascertain how it was applied for this project, I wondered if the project involved a Director's determination – a process that can be used to assign a definition for a use where one does not exist. See for context the following language which appears in 15-1202 and 15-1302 subsections (C) and (E):

> *"In cases where a specific land use or activity is not defined, the Director shall assign the land use or activity to a classification that is substantially similar in character per Section 15-5020, Director's Determination."*
>
> *"Use classifications and subclassifications not listed in the table or not found to be substantially similar to the uses below are not permitted."*

Section 15-5020 ("Director's Determination") identifies when such a determination would come into play ("Should this Code not list a permitted use, either directly or indirectly…") and outlines procedures for the determination to be allowed. It is unclear from review of the Draft EIR whether a Director's determination was made as part of this project, but if that is the case it should be disclosed as part of this CEQA process along with any findings or specific justification was included to support the determination. That being said, the proposed MDO facility consists of a use that is already defined in the Development Code (not expressly as "MDO facility" but as "Indoor Warehousing and Storage" or "Wholesaling and Distribution"), thus a Director's determination should not be available for use when the use in question is already defined in the code.

What is further striking to me from reviewing the General Plan and Development Code is that there would not apparently be such a consistency issue present if the subject land use application involved a GPA to one of the "Employment" designations (e.g., "Employment – Light Industrial") along with a rezone to the zone district consistent with that land use designation. As mentioned above, the Land Use Table for Employment Districts includes multiple types of WSD uses. Review of the table appears to indicate that all of the proposed land use components included as part of this project – the proposed MDO facility as well as large-format retail, food preparation, gas station, and car wash – are allowed under the BP, RBP, and IL zoning designations. Further, while the project entails a somewhat unique collection of multifaceted uses that make it hard to clearly categorize as either "Commercial" or "Employment" as described in the City's General Plan, there does not appear to be an obvious conflict between the project's characteristics and the goals and policies of Employment land use designations.

I103-2 cont.

The point I am getting to is this: I am concerned that the proposed project has been improperly classified as a general commercial use when it may be more akin to (and rightly classified) as a light industrial use, because the classification (or misclassification) materially impacts the public's understanding of the proposed project and the ability to meaningfully review and provide comment on the proposed project and impacts associated with it.

Based on the foregoing comments, I am requesting responses to the following questions:

1) Can City staff provide clarification as to whether the GPA and rezone associated with this application were based on a direct application of the Use Table or if the GPA/rezone is based on a Director's determination? If the former, please explain the reasoning. If the latter, please indicate whether any findings or justifications were made in support of the Director's determination.

3

2) Would the proposed project be allowed either by-right or with a CUP on a site with one of the "Employment" land use designations and BP, RBP, or IL zoning? (Note in case it needs to be made extra clear: By "Employment" designation, I am referring to whatever the corresponding land use designation would be to go along with the matching zone district, e.g., "Employment – Light Industrial" for IL zoning)

3) If a proposed GPA and rezone does not directly result in a project being consistent with the applicable Land Use Table but rather requires a subsequent determination by the Director to achieve consistency, and if an alternative GPA and rezone to a different designation was available that would achieve consistency through standard or more direct application of the Development Code/Land Use Table, does that violate or conflict with the provisions of the Development Code? I103-2 cont.

P.S. – The existing MDO facility is located at 3688 E. Central Avenue, which is in an unincorporated area of Fresno County near Malaga. As I was closing out this letter, I realized I had not previously bothered to check the zoning of that existing facility. Using the Fresno County GIS viewer, the existing MDO site appears to be zoned as *M-3(C) – Heavy Industrial* (see attached screenshot for reference).

2. ***Comments addressing issues and deficiencies in the analysis of specific categories of environmental effects – including Aesthetics, Biological Resources, Greenhouse Gas Emissions, Noise, and Transportation impacts.***

The following comments are focused on the specific categories of environmental effects discussed in the Draft EIR. The comments identify areas of the report where additional information is needed, mitigation measures should be added and/or revised, and at least one instance where the impact analysis (Greenhouse Gas Emissions) appears to have been so inadequate that it demands recirculation of the EIR.

*Aesthetics (Lighting and Glare)*

The Draft EIR's information and analysis regarding potential lighting and glare impacts is deficient because there is not enough information to fully ascertain the project's potential lighting- and glare-related impacts; the Draft EIR's reliance on the 0.5 foot-candle standard for residential uses does not fully address potential impacts associated with lighting and glare (notably, the potential for impacts to biological resources associated with the San Joaquin River, which could be adversely affected by increased light levels). On page 3.1-5 ("Light and Glare Conditions"), while stating that there are adjacent uses located in proximity to the site which introduce lighting onto the parcel and surrounding areas, the Draft EIR states "The project site is undeveloped and is, therefore, void of light and glare sources." I103-3

The proposed project would add a sizeable amount of lighting equipment in order to illuminate buildings and parking areas. Additionally, for this project the applicant is requesting to deviate from the City's normal lighting standards and install and operate taller lighting fixtures. In explanation of the request, there is some text which mentions that the request is related to the presence of power lines, plus some additional text stating that less powerful lights will be utilized at the edges of the project site (see page 2-10 of the Draft EIR).

The Draft EIR's determination that the project will not cause any significant lighting and/or glare impacts appears to be completely based on the fact that the project will be subject to (and

ostensibly comply with) City of Fresno lighting requirements which mandate that no greater than 0.5 foot-candle of light trespass occurs on neighboring residential properties. While this threshold is useful (and more stringent than in some other urban jurisdictions in California), there remains an analytical gap that needs to be bridged. In order to ascertain the potential impacts, there should be more information about the lighting provided for public review – such as more specific information about the type of lighting equipment so that there can be a comparison between the "normal" lighting and the lighting equipment requiring the deviation from normal standards.

In my experience preparing and reviewing CEQA documents for projects with substantial lighting components (e.g., athletic fields for public school campuses), it has been common for project proponents to provide documentation (Illumination Summary or Photometric Analysis with information about the proposed equipment specifications, site layout, and projected light output information (usually depicted as a numerical matrix overlaid on a site diagram showing the range of projected light areas on the site itself and the affected vicinity), and it has been common practice to make available the documentation as part of the project CEQA review process so that stakeholders are able to meaningfully understand lighting impacts such as where light will and will not fall and the intensity of light in different areas.

While the subject Costco project likely does not entail as intense lighting impacts as a high school football stadium, it is nonetheless a much more intensive use than anything that currently exists north of Herndon in this vicinity, plus its operational characteristics (including its very active large-format retail operations as well as delivery activities beginning at 2:00 am) imply more intensive utilization of lighting than other types of comparable commercial development projects where intense lighting is turned off or reduced during night-time hours. Moreover, merely referring to the 0.5 foot-candle standard only addresses potential nuisance impacts to neighboring residents and does not address other potentially significant impacts from lighting. Of particular note, there is essentially zero (or very limited and indirect) discussion or analysis of potential impacts from the lighting on wildlife; lighting can adversely impact migratory birds and nocturnal animals (see for reference the following links: https://www.fws.gov/story/2022-04/dim-lights-birds-night; https://darksky.org/resources/what-is-light-pollution/effects/wildlife-ecosystems/). While the project may in fact not result in these or other impacts, there should be information analysis provided in the Draft EIR to substantiate that determination.

I103-3 cont.

On 8/15/2023 I contacted the City of Fresno via email to inquire whether an Illumination Summary or other similar document for the project was available to review, and for reference I attached a copy of an Illumination Summary from a prior project. On the same day, I received correspondence indicating that City staff was working to identify if such a plan existed and if it could be distributed, but as of the date of this comment letter I have received no follow-up correspondence from the City. I would like to reiterate/renew my request for that information (or some other information that addresses the above-described lighting and glare concerns) and have it included as part of a Response to Comments, revisions included as part of the Final EIR, or a recirculated Draft EIR in the event that occurs.

*Biological Resources*

The risks I am concerned about regarding biological resources have to do with potentially adverse effects of the project in a location that is particularly close to the San Joaquin River, which is an area

I103-4

5

of the greater Fresno region that warrants heightened review for biological resources. This is substantiated by review of the Biological Resources section of the City's General Plan PEIR and a number of other sources of information (as one example, see Metadata brief for "Conservation Opportunities - San Joaquin Valley" GIS layer viewed using CNDDB BIOS: https://map.dfg.ca.gov/metadata/DS0422.html).

Overall, in reviewing the Draft EIR, I get the impression that the discussion and analysis is very specific to the project site and unduly discounts the potential for impacts to the nearby river corridor area. Perhaps even more so than immediate project-specific impacts, though, I am concerned about cumulative incremental effects of allowing the subject project and future additional, relatively intense urbanized uses to develop and operate in close proximity to the river.

Section 3.5.3 of the DEIR (under the subheading "Methodology") states the following: "This impact evaluation is based on data collected during reconnaissance-level field surveys conducted on November 1, 2021, and June 20, 2022, review of aerial photographs, and review of existing databases and environmental reports that address biological resources in the project vicinity." There does not appear to be a Biological Resources Assessment or other documentation included as part of the report other than the dates of the field surveys. While I am not questioning that the surveys took place, there is no reviewable description of who did the surveying (was it a qualified biologist, or field staff from the environmental consulting firm, or the project proponents?), nor are there details about the particular boundaries/areas that were surveyed, the duration of the surveying activities, or distinctions about what observations were made during the surveys versus through review of aerial/satellite imagery. Additionally, given that 2023 has been a relatively wet year for rainfall, I have questions as to whether surveys from fall 2021 and summer 2022 (relatively dry periods of time) adequately account for potential wet-year habitat-related variations such as the one experienced in spring 2023. Such information would be helpful in order to more meaningfully understand the analysis presented in the Draft EIR.

I103-4 cont.

My earlier comments note concerns about how project-related lighting and glare may have the potential to adversely affect migratory birds and other wildlife. Additionally, the project entails construction of netting located between the project and Riverside Golf, and while the netting is addressed in the Draft EIR's Aesthetics section it does not appear that the Draft EIR discussed potential impacts in the Biological Resources section. What I have typically seen in CEQA documents prepared for projects requiring similar netting (e.g., golf course and TopGolf projects) is at least some discussion and analysis addressing whether any potential impacts on biological resources would result (and if necessary, mitigation measures to reduce potentially significant impacts). While there is already some netting present at Riverside Golf Course, it seems that the overall increase in the amount of netting and the placement of the netting (east-west immediately north of the project site) could result in new or substantially increased impacts to migratory birds.

While the effects of such features may ultimately not reach a level that would constitute a significant impact, I request that the concerns identified above topics be more specifically addressed in a Response to Comments, revisions included as part of the Final EIR, or a recirculated Draft EIR in the event that occurs.

*Greenhouse Gas Emissions*

The determination presented in the Draft EIR that the project will result in less than significant impacts involving GHG emissions is fundamentally inconsistent with the Draft EIR's determination that the project will result in significant and unavoidable transportation impacts resulting from the amount of vehicle miles traveled (VMT) associate with the project.

Appendix G of the CEQA Guidelines includes the following question for evaluating the significance of GHG emissions: "Would the project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?"

There is an abundance of information explaining the linkages between GHG emissions and VMT, and even more of an abundance of information available discussing the effects of GHG emissions on climate change and world-wide adverse environmental impacts. While GHG emissions associated with VMT are probably most often thought of as emissions resulting from gas-powered vehicular travel, significant amounts of GHG emissions are also directly and indirectly generated through buildout and ongoing maintenance of the roadway transportation network.

Section 3.7.1 of the Draft EIR (Regulatory Setting for GHG Emissions and Climate Change) includes a list of plans, policies, and regulations concerning GHG emissions and climate change that are applicable to the proposed project. Other GHG-relevant plans, policies, and regulations appear in the Regulatory Setting for the Energy section (Section 3.6.1).

Below is a non-exhaustive list of applicable plans, policies, and regulations plus page references and excerpts with relevant and applicable content regarding the connections between GHG emissions and VMT:

- *2022 CARB SCOPING PLAN*

  https://ww2.arb.ca.gov/sites/default/files/2023-04/2022-sp.pdf

  (see discussion of VMT on p. 71-72, 192-195, and 270-271)

- *FRESNO COG 2022 RTP/SCS*

  https://www.planfresno.com/sustainable-communities-strategies-fall-outreach/

- *CITY OF FRESNO VMT GUIDELINES*

  https://www.fresno.gov/wp-content/uploads/2023/03/CEQA-Guidelines-for-Vehicle-Miles-Traveled-Final-Adopted-Version.pdf

  "The impact of transportation has shifted from congestion to climate change, and the purpose of the CEQA analysis is to disclose and ultimately reduce GHG emissions by reducing the number and length of automobile trips." (City of Fresno VMT Guidelines, p. 23)

  (See additional discussion of GHG emissions in relation VMT on p. 2, 9, 13)

I103-5

7

While the text of the Draft EIR directly mentions or references a number of applicable GHG-related plans, policies, and regulations, the actual analysis in the GHG Emissions section of the Draft EIR is essentially entirely limited to discussion and evaluation of the City of Fresno's Greenhouse Gas Reduction Plan (GHGRP). The City GHGRP

That can allow for analysis, including streamlined GHG analysis in some cases.

On p. 3.7-10, the DEIR correctly explains that streamlining is not available for this project because of the general plan and rezone involved:

> *"The City has an adopted GHGRP with a checklist available for use in CEQA analyses; however, the project is amending the general plan such that the project would, by a comparative worst-case scenario analysis, have greater emissions than the land use type included in the general plan."*

The DEIR then goes on to state that the significance analysis can use the GHGRP's same BAU approach to substantiate the determinations for not one but *both* Appendix G questions:

> *"Nevertheless, the city has applied the GHGRP's BAU approach to substantiate the significance determination of the project. The use of the GHGRP in determining the project's significance answers both the Appendix G questions of whether the project would directly or indirectly generate substantial GHG emissions as well as conflict with a local or statewide plan to reduce GHG emissions (in this case, the city's GHGRP)."*

There are two big issues here. First, the phrasing of this statement could lead one to believe that showing consistency with the GHGRP is the *only* step needed or the *only* applicable plan for this project. While the City's GHGRP is informed by and related to a variety of other GHG plans, policies, and regulations, it is not so fully overlapping or authoritative (especially in a non-streamlining scenario as is the case with this project) that consistency with the GHGRP equates to or supersedes consistency determinations for all other applicable GHG plans, policies, and regulations.

I103-5 cont.

Second, there is language in the Draft EIR itself that appears to directly state or infer conflicts and/or inconsistencies between the project (particularly because of its VMT) and applicable GHG plans, policies, and regulations (see Draft EIR excerpts below, with underlining added for emphasis by me):

> On p. 3.7-12:
>
> *The 2022 Scoping Plan provides the framework for achieving these aggressive targets, and includes language that can be interpreted as revising the goal for 2030 to 48 percent reduction from 1990 levels as compared to the 40 percent reduction legislated in SB 32 (CARB 2022: 71).*
>
> *The goals established in the GHGRP were designed to adhere to the, then, most current GHG reduction target mandated by SB 32 (i.e., 40 percent reduction from 1990 levels by 2030). <u>It is therefore foreseeable that the GHGRP's existing targets could be interpreted as inconsistent with the state's current long-term GHG reduction goals for 2030 (i.e., 48 percent below 1990 levels by 2030) and 2045 (i.e., 85 percent reduction from 1990 levels and carbon neutrality).</u>*

On p. 3.7-13:

*Additionally, the use of CAP consistency for CEQA determinations is still supported by CARB in Appendix D of the 2022 Scoping Plan (CARB 2022: 7-10). The 2022 Scoping Plan does not explicitly state that the new reduction goals of AB 1279 disqualify existing CAPs that align with the state's previous target of reducing emissions by 40 percent from the 1990 inventory.*

(Note: The appearance of this statement leads me to believe it is strongly suggested by the 2022 Scoping Plan

Further, in some places where the Draft EIR purports to show the project's consistency, there are explanations provided that are logically inconsistent and/or astonishingly misleading.

In Appendix B, Table B-1 of the DEIR's Energy technical subreport (included as Appendix E of the Draft EIR; p. 905 of the DEIR PDF) states the following:

*The Project would not conflict with the implementation of SB 375. Furthermore, the Project would be consistent with the goals of the Fresno Council of Government's (Fresno COG's) Regional Transportation Plan/Sustainable Communities Strategy, which demonstrates how the Fresno region under Fresno COG's jurisdiction will meet the emission reduction targets of SB 375.*

By exceeding the VMT threshold, the project is absolutely at odds with SB 375's GHG reduction goals and the means of achieving those goals as well as the 2022 CARB Scoping Plan, the RTP/SCS, the City of Fresno VMT Guidelines, and numerous other comprehensive GHG emissions-related pieces of policymaking and regulation that involve consideration of VMT.

I103-5 cont.

Also see the project's GHG Emissions Technical Report (Appendix F of the Draft EIR; p. 1085 of the DEIR PDF). In that document, while the consistency analysis seemingly hand-waives away the project's GHG impacts resulting from its VMT because "the [VMT reduction] goal is not applicable to an individual commercial project" (a statement which warrants calling out that this proposal entails even more than that – it is a GPA/rezone along with a uniquely outsized project that can effect VMT and GHG on a citywide if not regionwide basis), the analysis goes on tout how project-specific measures to help mitigate VMT will also help reduce GHG and thus demonstrate consistency with the 2022 CARB Scoping Plan and Fresno COG RTP/SCS goals and policies to reduce VMT. This double-standard where project-specific adverse impacts seemingly do not count but project-specific benefits do count is a very problematic form of reasoning.

The concluding rationale state in part that because "the GHGRP is designed to be updated periodically, [...] it is assumed that such updates would account for the state's most recent long-term GHG reduction goals of AB 1279." (p. 3.7-13 of the Draft EIR). Future updates would not magically retroactively address significant GHG effects of this project that will be largely irreversibly set in motion upon approval of the project. It sets back efforts and shifts the reduction burdens to future projects and plans.

While GHG analyses might be the most technically-heavy and complex topics of environmental effect covered in CEQA, and VMT is a similarly esoteric topic for most people, the VMT-GHT cause-effect

relationship is unequivocally clear. There are some specific situations where it may somehow be justifiable to determine that a project with VMT exceeding the applicable threshold would not also be considered to have a significant and unavoidable (and generally there are screening criteria or other exemptions available to identify and address these situations). However, large retail/employment projects constructed in suburban edge locations like the subject project site are among the poster children for highly-impactful high-VMT projects with high GHG emissions that are squarely targeted to be addressed through GHG-reduction policymaking and regulation. It cannot be pretended that a project of this nature and this scale ("the largest Costco in the world") – both at the project-specific and cumulative level – does not unequivocally conflict with the 2022 CARB Scoping Plan, the RTP/SCS, SB 743, and other plans, policies, and regulations that have been adopted to address GHG emissions and climate change.

In *Sierra Club v. County of Fresno* (a.k.a. the "*Friant Ranch*" case), a key part of the California Supreme Court's ruling in that case is that an EIR must include "sufficient detail to enable those who did not participate in its preparation to understand and consider meaningfully the issues the proposed project raises." An additional key part of the ruling, which was related to the adequacy of an EIR's air quality analysis, is that an EIR must show a "reasonable effort to substantively connect a project's air quality impacts to likely health consequences." Under the same line of reasoning that follows from *Friant Ranch*, the CEQA document here is required to make reasonable effort to substantially connect the project's VMT impacts to GHG emissions impacts and consequences; based on the foregoing information presented in these comments, it has not done so.

CEQA Guidelines section 15088.5 require a lead agency to recirculate an EIR when significant new information is added to the EIR after public notice is given of the availability of the draft EIR. Per 15088.5, "significant new information" requiring recirculation includes:

I103-5 cont.

> *(1) A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented.*
>
> *(2) A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance.*

The Draft EIR's failure to identify policy and regulatory conflicts and inconsistencies resulting from the project's GHG-related impacts (which stem from its acknowledged threshold-exceeding VMT levels) as being significant and unavoidable impact is a major analytical and informational deficiency. Since recirculation is required in situations involving subsequent identification of a significant and unavoidable impact which was not previously identified as such, recirculation of this EIR with the necessary updated information should be required in order for the environmental review process to comply with CEQA.

As a general reminder, CEQA does not ban projects with significant and unavoidable impacts from ultimately being carried out when there are compelling reasons to do so (and those reasons, presented in a Findings of Fact and Statement of Overriding Considerations, can be pretty broad and be for legitimate and non-environmentally-centric reasons). What CEQA does require is disclosure of information in order to allow informed understanding and meaningful public participation.

*Noise*

Mitigation Measure 3-11.5 which addresses traffic noise impacts on neighbor residences includes language that appears to be illusory and unenforceable (specifically, the proposal to increase wall height on residential properties on the condition that all of the neighboring property owners are willing to opt into the increased height). Per the Draft EIR's analysis, the wall height increase is apparently not even needed to meet the performance standard of reducing noise levels below the 65 dB threshold so long as the project utilizes the special rubberized hot asphalt (or similar equivalent) on the road surface of Riverside Drive. The language should be removed and if necessary replaced with other potential noise mitigation measures. More specifically, such measures should be focused on aspects of the project within the project applicant's direct control (e.g., modifications to its own property or operational characteristics and/or practices) rather than shifting the burden to private third parties. I103-6

*Transportation*

The Draft EIR identifies three significant and unavoidable environmental impacts involving transportation effects: 1) VMT above SB 743 thresholds; 2) transportation safety issues due to potentially hazardous queuing conditions at three locations in the vicinity of the site (Fir and Riverside, Herndon and Riverside, and Herndon and Golden State); and 3) cumulative impacts associated with VMT above thresholds. Regarding VMT, earlier comments in this response letter under Greenhouse Gas Emissions discuss the implications of excessive VMT in relation to GHG emissions and applicable plans, policies, and regulations for reducing GHG emissions.

Regarding the transportation safety impacts resulting from hazardous queuing conditions, I am concerned that the risks associated with queuing (especially at Herndon and Golden State) are exacerbated by the proximity of the railroad tracks. As I understand it from reviewing the Draft EIR, the report's determination that the queuing conditions would be potentially hazardous is based only on the vehicular roadway characteristics – i.e., the queuing conditions were determined to be hazardous independent of any consideration about the proximity of the railroad, thus the risks associated with vehicles being queued near the railroad tracks may be even more significant due to heightened risks of train-on-car collisions (or even car-on-car collisions indirectly influenced by drivers trying to navigate the railroad tracks). I103-7

Although the project involves downgrading Herndon Avenue from an Expressway to a Super Arterial, development of the project at this location will nonetheless entail a significant number of project visitors (customers, employees, delivery trucks, etc.) who will continue to use primarily Herndon rather than other roadways to access the site. For instance, anyone traveling southbound on SR-99 to reach the site or using SR-99 to reach northern destinations after departing from the site (e.g., Madera residents, southbound SR-99 travelers as they arrive, and northbound SR-99 travelers as they depart) would use Herndon to access and leave the site. A significant number of existing and future site visitors located along Grantland Avenue and further to the west (from the new Parc West development area to as far west as Kerman and Mendota) may also end up utilizing Herndon via Grantland Avenue/Parkway Drive rather than Veterans or other roadways because this route appears to currently offer the shortest required distance of travel to and from the site for those locations; from the intersection of Shaw and Grantland, the travel distance required to reach the proposed site appears to be approximately 0.4-mile shorter than using Veterans.

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As discussed in more detail in other comments regarding the Alternatives analysis, the Draft EIR should have included evaluation of an alternative site in order to determine if the significant and unavoidable queuing impacts are capable of being mitigated to a less than significant level or at least substantially reduced through developing the site at a different location in the same general vicinity.

The interplay between hazardous queuing conditions and the proximity of railroad tracks will be reduced once Herndon Avenue becomes grade-separated as part of the buildout of High-Speed Rail. With that in mind, there should be consideration of whether a mitigation measure to delay operation of the project until the grade-separation project is either completed or substantially initiated (i.e., work begins where Herndon is closed off at Golden State) would substantially reduce the transportation safety impacts associated with queuing conditions. I103-7 cont.

While there could be feasibility issues with implementing this measure, it is noted that the temporary closure of Herndon for HSR construction will take place regardless of when the project (if approved) begins operation. It is also noted that this kind of deferral , such as the Parc West residential subdivision located along the west side of Grantland Avenue which required deferral of the project buildout until completion of Veterans Boulevard and a fire station to serve the area.

***3. Comments on the Draft EIR's Alternatives analysis***

*(Note: I have no financial or professional interest whatsoever in the siting of the proposed Costco project. I just very much want the City of Fresno to be able to realize the highest and best version of itself, which in large part is determined by thoughtful land use planning. The physical and operational characteristics of this project make it uniquely consequential not just for northwest Fresno but for the city, county, and region.)*

Following publication of the NOP for this project, I submitted comments recommending that alternative site locations be analyzed as part of the EIR process since it appeared likely that at least some potentially significant impacts would result from the project and that some of the impacts would be substantially if not primarily attributable to the proposed location of the project. My comments recommended that the EIR evaluate whether any significant impacts could be avoided or substantially reduced through developing the proposed project at a different location in the same general vicinity. The comments included identification of three specific alternative sites located within one mile of the proposed project site with similar site characteristics to the proposed project site. My initial comments (which I submitted to via email to Jose Valenzuela via email on March 30, 2022, following release of the NOP and the initial review period) were not included as part of Draft EIR Appendix A. However, the three alternative locations from my comment letter are specifically identified in Section 6.3 of the Draft EIR. The alternative locations are preliminarily discussed but then dismissed as "Alternatives Considered but Not Evaluated Further", and no other alternative site locations are considered in the Draft EIR's analysis. (N I103-8

Based on the principles and requirements set forth under CEQA, the decision to not analyze at least one alternative site location to the same degree other alternatives were analyzed was improper because it precluded the opportunity to meaningfully contextualize at least one of the significant and unavoidable impacts (transportation safety hazards from queuing) and illustrate the ability and feasibility of reducing or avoiding significant and unavoidable impacts associated with the project.

Within the CEQA Guidelines, Section 15126.6 is the primary source for guidance regarding consideration and discussion of alternatives in and EIR. Excerpts from the CEQA Guidelines section 15126.6 are presented below (with some underlining added for emphasis by me):

*(a) Alternatives to the Proposed Project. An EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives. An EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation.*

*(b) Purpose. Because an EIR must identify ways to mitigate or avoid the significant effects that a project may have on the environment (Public Resources Code Section 21002.1), the discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly.*

*…*

*(d) Evaluation of alternatives. The EIR shall include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed project. A matrix displaying the major characteristics and significant environmental effects of each alternative may be used to summarize the comparison. If an alternative would cause one or more significant effects in addition to those that would be caused by the project as proposed, the significant effects of the alternative shall be discussed, but in less detail than the significant effects of the project as proposed. (County of Inyo v. City of Los Angeles (1981) 124 Cal.App.3d 1).*

I103-8 cont.

*…*

*(f) Rule of reason. The range of alternatives required in an EIR is governed by a "rule of reason" that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice. The alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the project. Of those alternatives, the EIR need examine in detail only the ones that the lead agency determines could feasibly attain most of the basic objectives of the project. The range of feasible alternatives shall be selected and discussed in a manner to foster meaningful public participation and informed decision making.*

*…*

*Among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries (projects with a regionally significant impact should consider the regional context), and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site*

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*(or the site is already owned by the proponent). No one of these factors establishes a fixed limit on the scope of reasonable alternatives. (Citizens of Goleta Valley v. Board of Supervisors (1990) 52 Cal.3d 553; see Save Our Residential Environment v. City of West Hollywood (1992) 9 Cal.App.4th 1745, 1753, fn. 1).*

First, there are alternative project sites in the same vicinity (such as at least one of the three alternative sites identified in my original comment letter) that would attain the project objectives identified in the Draft EIR (or at least to a substantially similar degree as the project at its currently-proposed location). The Draft EIR does not appear to dispute that a locational alternative (including at least one of the specifically-identified sites) could attain the project objectives to at least a substantially similar degree at the proposed project.

Second, the consideration of a different location as a project alternative is one that would avoid or substantially reduce a significant and unavoidable impact and thus merits consideration (subject to the rule of reason). Here, it is reasonably likely that an alternative site (in particular, at least one of the three sites identified in my original comment letter) would avoid the significant and unavoidable transportation safety queuing impacts identified in the Draft EIR. A different location closer to Veterans Boulevard could provide more roadway and queuing capacity, and such a location would also shift project-related traffic activity away from the at-grade railroad tracks. (Also see for reference prior discussion of Transportation impacts under Comment 2.)

Other impacts identified in the Draft EIR (as well as some that may have gone unidentified) could also be avoided or substantially reduced. For instance, impacts involving lighting and biological resource impacts associated with the proposed project site's proximity to the San Joaquin River (discussed earlier in Comment 2) would likely be reduced or avoided by siting a project at a location to the south of Herndon Avenue. At least one of the identified alternative locations may offer a substantial reduction in exposure of sensitive receptors to project-related noise impacts (both temporary construction and long-term operational). While the DEIR generally concludes that impacts at the alternative sites would be the same due to distances and also lack of existing noise walls, this does not account for site layouts which could locate the buildings and loading dock areas further away from receptors than what is entailed for the current project. Noise-related impacts may also be qualitatively less perceptible to receptors because this area likely has a higher existing background noise levels as a baseline (attributable to existing activity along the freeway, the rail line, and the El Paseo shopping center) than at the currently-proposed site.

I103-8 cont.

Third, an alternative location option (particularly one involving at least one of the three identified sites) should be considered feasible enough to at least merit more detailed evaluation in the Draft EIR rather than be preliminarily screened out. The items identified in the Draft EIR as ostensibly presenting feasibility issues include site access (particularly no direct access from Veterans), presence of power lines, GPA/zoning issues, SB 330 issues, and site ownership/acquisition issues. These items, for reasons addressed in the following list, should not be considered valid as a basis for finding a different site location to be infeasible for consideration as an alternative in the EIR:

- Regarding site access, this issue lacks credibility given that comparable types of existing commercial development exist in the vicinity and the fact that private access drives could be created or modified to accommodate the project (as is the case with the proposed project

itself, which would include construction of a new private drive from Herndon Avenue). Further, since the project sites are within the same vicinity (one mile or less from the project site) and Veterans Boulevard is immediately adjacent (not necessarily for direct access but for circulating the volume of vehicles), the transportation network should be able to accommodate the project to a similar degree as the currently proposed site, if not better.

- Regarding power lines and related infrastructure, this issue lacks credibility given that the current project site includes a major power line easement that was apparently able to be accommodated as part of the site plan and other project design elements. Also see for reference the Walmart on west Shaw Avenue – a well-known example of a project within the northwest Fresno area which has comparable physical and operational characteristics to the proposed project and was able to develop and operate on a site with power line easements and lattice structures present.

- Since the currently proposed project itself involves a general plan amendment and rezone, dismissing other sites for lack of compatible land use designations appears to be an inconsistent and unreasonable approach for feasibility screening. Additionally in specific regard to the site north of Veterans and west of Riverside, discussion in Comment 1 of this response letter (which explains how the project would be consistent with this area's current Light Industrial designation and zoning) contradicts Draft EIR's statement in the Alternatives section that the site at northwest corner of Veterans and Riverside would require a GPA and rezone. Further, if it is in fact the case that the proposed project would be allowed under the existing land use/zoning designation at that site, developing there would actually require a lesser degree of change to the existing land use planning framework than would be required for the project as currently proposed (which requires a GPA and rezone).

I103-8 cont.

- Regarding the SB 330-related remarks in the Draft EIR, the description of the SB 330 requirements appears to be generally accurate but missing additional information or context. The summary of requirements appears generally correct, More specifically, the description omits or downplays the fact that cities can and do rebalance housing unit allocations (and anecdotally, I would describe the City of Fresno as a jurisdiction that readily plays or at least facilitates SB 330 musical chairs). The more important point is that housing unit rebalancing is not any more substantial of a regulatory hurdle than what is already entailed for the GPA/rezone associated with the project as currently proposed. Further, the current project site location could be redesignated for residential use in order to restore or rebalance planned housing unit capacity, or the vacant leftover parcel to the east of the currently proposed site that is already designated as residential could be upzoned for additional housing unit capacity.

- Regarding site ownership and acquisition issues, the situation is not one that any such issues should have precluded analysis for reasons of feasibility. See first 15126.6 which stipulates that significant-impact-avoiding alternatives shall not be screened out merely for being costly. Next, all of the sites consisted of a parcel (or a grouping of parcels) of sufficient size for the project that were to the best of my understanding under common ownership. At the time I submitted my comment letter, two of the proposed alternative sites (the ones on either side of Veterans) were actively for sale. Currently, these sites are physically vacant and

to the best of my understanding do not have any approved entitlements (note: "concept plans" and pre-application review without more are just that – conceptual). Also important to note is the fact that the EIR gave serious consideration to a mixed-use alternative. (Note: By "serious" I am referring to the fact that it was analyzed in greater detail and was included in the summary matrix of alternatives.) The capital outlay and other regulatory complexities which would be required for such a project likely exceeds the costs and efforts associated with acquiring and developing the proposed project on one of the specifically-identified alternative sites. In summary,

Lastly, the inclusion of at least one different project site location as part of the EIR's alternative analysis is necessary to foster informed decision making and meaningful public participation on the project. In a corresponding sense, *not* including such an alternative undermines informed decision making and meaningful public participation to an unreasonable level.

CEQA case law illustrating the principle mentioned above includes the holding of *We Advocate Through Environmental Review, et al. v. County of Siskiyou* (a.k.a. the *"Crystal Geyser"* case). In that case, the court ruled against certification of an EIR and required recirculation in part because the objectives of the project under consideration were so overly narrow as to make the outcome of the EIR analysis (particularly for whether or not feasible alternatives could be identified) a mere formality.

I103-8 cont.

The project objectives here are not expressly written so narrowly as in the *Crystal Geyser* case, the approach to consideration of alternative locations that was utilized in the Draft EIR was so arbitrary that it resulted the same end-effect as in a situation like *Crystal Geyser* where the outcome was a mere formality.

To its credit, later content in the Draft EIR's Alternatives section includes a more detailed analysis and seems to otherwise allow for meaningful comparison among a range of alternatives. However, in order to foster informed decision making and meaningful public participation for this specific project situation, that comparative process demands inclusion of an alternative location. Therefore, the Draft EIR should be updated with sufficient information evaluating at least one of the proposed alternative site locations.

## Letter I103 Daniel Brannick

August 31, 2023

Response I103-1

The comment expresses opposition to the location for the proposed project and provides introductory remarks summarizing the content of the letter, which are responded to in Responses I130-2 through I130-8, below. The comment expresses a desire to identify an alternative project site that would avoid "significant costs" while substantially fulfilling the stated project objectives. No details about the perceived costs or alternatives are provided.

Response I103-2

The comment raises several questions related to the inclusion of the MDO component of the project on a site that is proposed for redesignation as General Commercial through a General Plan amendment and rezone. The proposed land use and zoning designations were determined as the most appropriate for the application by City staff; a Director's determination was not made. The purpose of the CG zoning designation is stated in the Fresno Development Code (Section 15-1202) as follows:

> The CG district is intended to accommodate a range of retail and service uses that are not appropriate in other areas because of higher volumes of vehicle traffic and potential impacts on other uses. Examples of allowable uses include: building materials, storage facilities with active storefronts, equipment rental, wholesale businesses, and specialized retail not normally found in shopping centers.

Permitted uses within the CG district include General Retail and Large Format Retail. Costco is a Large Format Retail use, defined to mean:

> Retail establishments (over 80,000 square feet of sales area) that sell merchandise and bulk goods for individual consumption, including membership warehouse clubs.

Therefore, the Costco retail warehouse is permissible as the primary use on the site.

The comment expresses an opinion that the MDO may not meet the definition of an accessory use. Fresno Development Code section 15-2703 defines "accessory uses" as follows:

> An accessory use shall be incidental, related, appropriate, and clearly subordinate to the principal use or building to which it relates; under the same regulations applied to the principal use in any zoning district; and where the accessory use does not alter the principal use.

The MDO element of the building would facilitate efficient delivery of big and bulky items, including furniture, major appliances, patio furniture, televisions, fitness equipment, mattresses, and grills. The MDO activities are subordinate to the typical Costco layout and experience and would not alter the principal commercial use (Holliday, pers. comm., 2023). For this reason, the City determined that the MDO falls within the accessory use classification and an "employment" designation was not pursued. As an accessory use to the retail warehouse, the MDO is allowable in the General Commercial designation.

By way of background, Costco purchased Innovel Solutions in 2020 to bring in-house the last-mile logistics capability for delivering such items to members, complete with "white glove" installation of appliances. Innovel's assets included numerous free-standing MDOs. Costco plans to integrate this business model to reflect members' evolving shopping patterns and demands. The proposed project would be one of 17 new, integrated MDO locations planned by the end of 2024. Costco already has eight existing warehouses that include MDOs: Ankeny, Iowa; Tulsa, Oklahoma; Gypsum, Colorado; Warrenton, Oregon; Ridgeland, Mississippi; Springfield, Missouri; Duluth, Minnesota; and Billings, Montana. Nearly all of these sites are zoned within some type of commercial district and have a related commercial designation in that state's version of a general plan (Holliday, pers. comm., 2023).

Costco describes the MDO component of the building as integral to Costco's move to an omnichannel retail experience, where members can better interact with Costco to shop, buy, and return goods through multiple locations or platforms (Holliday, pers. comm., 2023). Whether members purchase items online or in the warehouse,

large goods can be delivered to them from the MDO space. The MDO space functions much like the storage/warehousing element of a typical home improvement or furniture store, allowing these types of activities:

- Costco can pull in-stock items from the MDO and display them on the sales floor in a vignette to allow members in-person visibility to online inventory. For example, displaying a sofa sectional that is only available for purchase online allows members to see/touch/sit in the item before they make their purchase.
- Members can view and then purchase "big and bulky" items from the sales floor and have them delivered out of the MDO space.
- Members who purchase items online that are in-stock at the MDO can receive delivery in as soon as two days, much quicker than if items were stored in a large regional distribution center.
- Member home delivery issues can be handled in-person at the MDO within the building rather than directing members to a national call center for resolution.

Furthermore, the MDO is physically and functionally unified with the other activities within the Costco structure, providing operational efficiencies, such as:

- Employee continuity: Employees are shared among the building activities when needed (e.g., to cover sick calls and vacations and to assist during periods of unexpected high volume). There are cross-training opportunities for employees within the different focus areas within the Costco building. Having Costco's various activities within the building facilitates daily opening and closing management coverage.
- Building synergy: All elements reside within one contiguous building that shares lighting, HVAC, security and utility systems, as well as employee facilities like restrooms, breakrooms, quiet rooms, and meeting rooms.
- Operational efficiencies: Equipment is shared throughout the entire warehouse building, including forklifts, compactors, cardboard balers, time clocks, and more.
- Transportation efficiencies: There is a shared receiving area to serve the sales floor and the MDO. Mixed load transportation/distribution allows Costco to combine in a single trailer merchandise destined for the sales floor or the MDO to deliver full trailers to the location, reducing the need to distribute "less-than-load" shipments. Not only does this make for a more efficient commercial operation, but it also minimizes truck miles and emissions.

After careful review and consideration, City staff reaffirms the determination that the General Commercial designation is appropriate application of the Development Code. The operation of the entire facility, including the MDO component, is fully and accurately described in the Draft EIR, providing the public with an opportunity to understand and provide meaningful comment on the proposal. No revisions to the Draft EIR are necessary in response to this comment.

Response I103-3

The comment states that there is not adequate information provided in the Draft EIR "to fully ascertain the project's potential lighting- and glare-related impacts." The comment acknowledges the analysis based upon the City's lighting regulations and modeled light trespass as reference points in evaluating and measuring effects on existing residents but suggests that additional information should be presented to more comprehensively evaluate the proposed change from existing conditions. As explained below, the analysis in the Draft EIR meets the standards for adequacy and enables a decision on the project that accounts for environmental consequences.

The comment indicates that more specific information about the type of lighting equipment is necessary to inform public review and allow a comparison to "normal" lighting. As noted in the comment Chapter 2, "Project Description," (page 2-10) of the Draft EIR, provides the following explanation of the lighting plan, which includes information about illumination intensity, light standard size compared to fixtures typically permitted in commercial districts, and restrictions within the PG&E easement.

> The project applicant has applied for a PD Permit to request deviations from Section 15-2015 of the Municipal Code, which specifies that lighting fixtures in commercial districts have a maximum height of 25 feet. Costco aims to achieve 2.5 foot-candles of light throughout the parking area to maximize safety within

> the parking lot. This level of lighting is intended to provide security and safety for drivers and pedestrians navigating the parking lot at night. The project would include light fixtures with a maximum height of approximately 36.5 feet instead of the allowed 25-foot-tall fixtures to reduce the number of lights needed to achieve the desired light levels within the parking field. The proposed 36.5-foot-tall light poles also allow a more diffuse distribution of light, reducing the difference in light levels in the areas between poles. The taller lighting also ensures that the area beneath the PG&E easement that runs directly through the parking field has adequate lighting. (No structures, including light poles, are allowed within this overhead easement.) Off-site glare and light spillover from parking lot light fixtures would be minimized by using less powerful lights on fixtures at the edge of the property.

The analysis in Section 3.1, "Aesthetics," provides a similar summary of these proposed conditions. The impact analysis in this section evaluates the potential for the project to create a new source of substantial light or glare that would adversely affect nighttime views of the area. The threshold is appropriately based on the sample questions provided in Appendix G to the State CEQA Guidelines and is informed by the City's standards for light and glare. The Draft EIR (page 3.1-2) summarizes the various elements of the Fresno Municipal Code related to lighting. These standards prevent illumination spillover or glare onto adjoining properties and prohibit interference with normal operation of adjacent property. As explained in the analysis of Impact 3.1-2 (Draft EIR page 3.1-9), the applicant would be required to demonstrate that all fixtures would be downcast and would not exceed the 0.5-foot-candle standard established in Section 15-2420 of the Fresno Municipal Code and the Bullard Community Plan for light spillover onto adjacent residential areas.

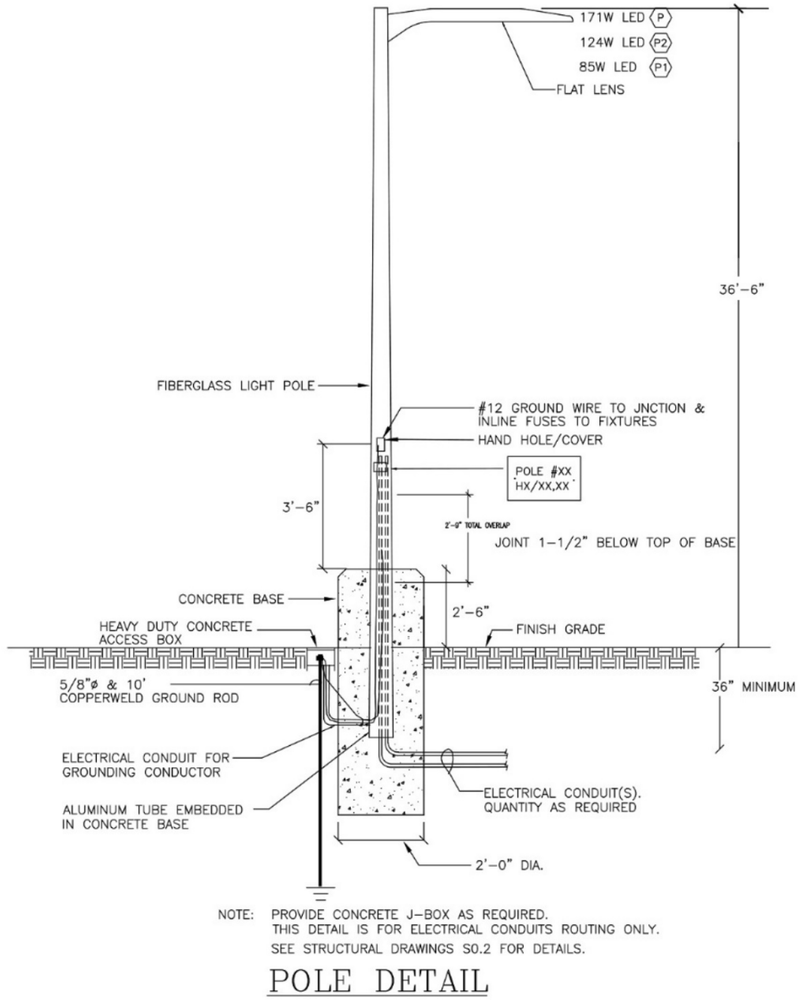
The comment does not provide evidence to support the claim that the Draft EIR does not provide adequate information or analysis of potential impacts. The analysis in the Draft EIR meets the standards for adequacy and enables a decision on the project that accounts for environmental consequences. There is no obligation for the City to perform exhaustive evaluation where the standard approach to analysis is determined sufficient and appropriate.

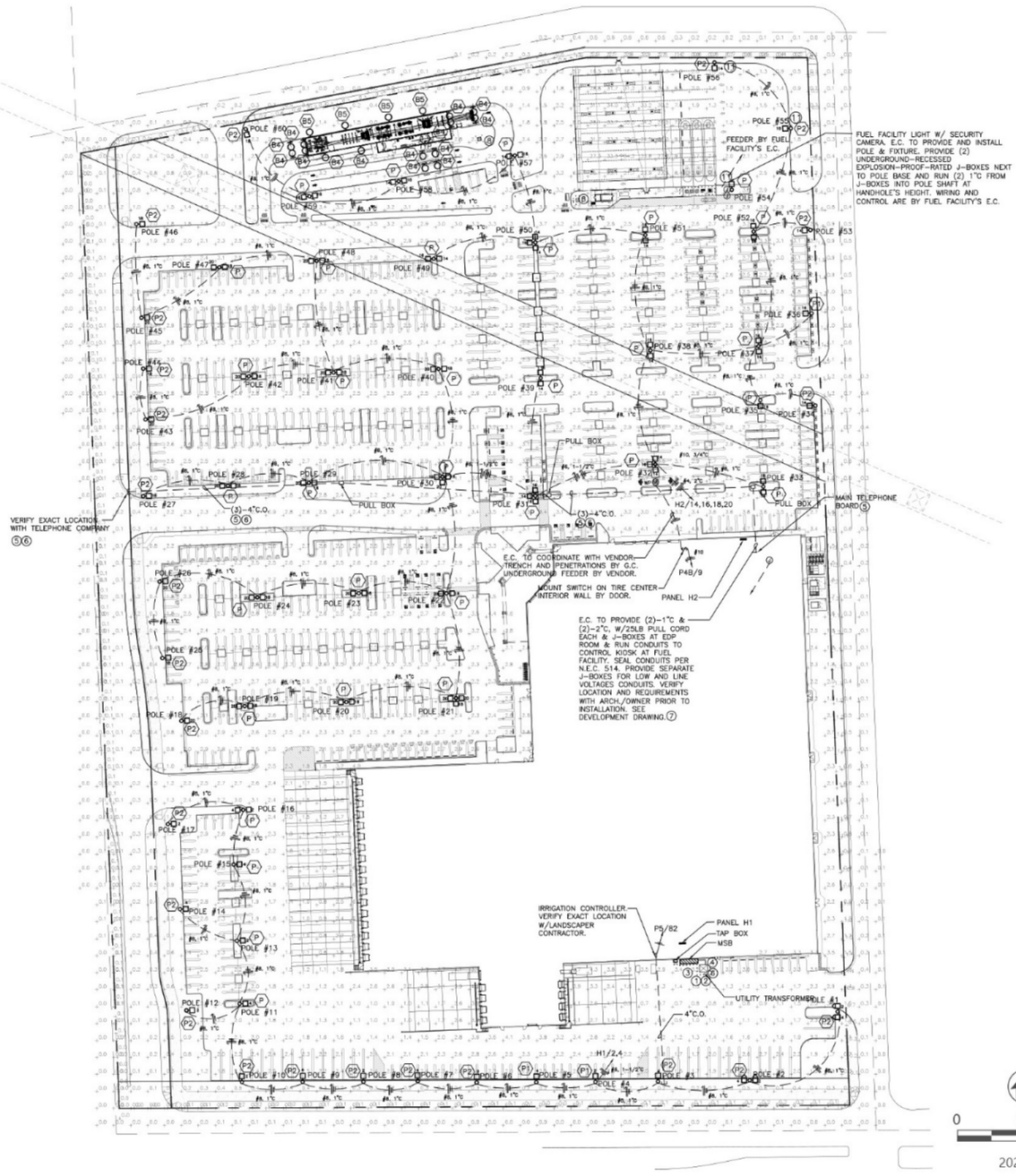
Further, although the comment states that projects with "substantial lighting components," such as athletic fields, often conduct separate technical analyses to model light impacts, it also concedes that the "Costco project likely does not entail as intense lighting impacts as a high school football stadium." Nonetheless, the applicant has prepared Figure 2-1, below, which provides the detailed site lighting plan, including pole detail, requested in the comment. Figure 2-1 demonstrates that no lighting spillover is anticipated onto adjacent residential areas and supports the analysis and conclusions in the Draft EIR. The grid of light intensity indicates light levels below the 0.5 foot-candle threshold on adjacent roadways.

The comment also indicates that the effect of lighting on wildlife should be evaluated in the Draft EIR. As evidence, a link to an article about the effects of light pollution on migratory birds is provided. Specifically, the article suggests turning off exterior lights during peak migration season. As explained in the Draft EIR (see Section 3.1, "Aesthetics"), the proposed lighting is required for safety and cannot be turned off. Where lights must remain on, limiting light pollution minimizes the potential for effects on migratory birds. The proposed exterior lights would be compliant with established Fresno Municipal Code requirements related to shielding and minimizing the illumination of the surrounding landscape. As indicated in the Draft EIR "[s]hielding requirements in Section 15-2015 of the Fresno Municipal Code would also prohibit light pollution associated with upcast light…" (see page 3.1-9).

Furthermore, Section 3.5, "Biological Resources," includes information about the presence of migratory birds on and around the project site. As explained on page 3.5-12 of the Draft EIR:

> According to the California Essential Habitat Connectivity Project, the project site is not located within a Natural Landscape Block or Essential Habitat Connectivity area (Spencer et al. 2010). Project development would not interfere substantially with the movement of any native resident or migratory wildlife species because the project site does not currently provide an important connection between any areas of natural habitat that would otherwise be isolated. While wildlife may use the project site for nesting and roosting or may pass through the site occasionally, it is unlikely that the project site functions as a significant wildlife movement corridor or wildlife nursery site due to the lack of high-quality natural habitat and extensive residential and commercial development surrounding the site.




Source: Image produced and provided by TE Inc, 2022, adapted by Ascent in 2023.

**Figure 2-1 Photometric Plan**

Response I103-4

The comment raises issues associated with biological resources. The first issue raised relates to the proximity of the project site to the San Joaquin River. The comment suggests that the Draft EIR leaves the impression that the analysis focuses primarily on the project site, and not the river. As stated in the Draft EIR (page 3.5-2) the project site is located 0.35 mile from the south of the San Joaquin River. The golf course is located between the project site and the river; moreover, a paved parking lot and several structures associated with the golf course intervene between the river and the project site. There is existing fencing between the golf course and the project site. The project site is surrounded by existing development and the golf course. There is no riparian habitat or other habitat associated with the river on or near the project site. The project site does not provide an important wildlife movement corridor. As stated in the Draft EIR (page 3.5-12), according to the California Essential Habitat Connectivity Project, the project site is not located within a Natural Landscape Block or Essential Habitat Connectivity area. Project development would not interfere substantially with the movement of any native resident or migratory wildlife species because the project site does not currently provide an important connection between any areas of natural habitat that would otherwise be isolated. While wildlife may use the project site for nesting and roosting or may pass through the site occasionally, it is unlikely that the project site functions as a significant wildlife movement corridor or wildlife nursery site due to the lack of high-quality natural habitat and extensive residential and commercial development surrounding the site. Note also that CDFW has reviewed the Draft EIR and indicated concurrence with the results of the biological resources analysis. See Comment A1-2.

The comment expresses concern about the cumulative effects of development in proximity to the San Joaquin River. It is important to note that this project site was designated in the City's General Plan for commercial development. The cumulative effects of implementing the General Plan land use diagram, including urban designations near the San Joaquin River, were previously evaluated for development in the City's Geneal Plan Program EIR (City of Fresno 2020). Consistent with the conclusions of the Draft EIR prepared for the proposed project, the City's General Plan Program EIR, which evaluated implementation of planned development in this area, concludes that impacts associated with interference of wildlife movement are less than significant. (See Impact BIO-4 of the City's General Plan Draft Program EIR.) In addition, the Draft EIR includes an analysis of cumulative effects to biological resources based on known and reasonably foreseeable development in the project area. Impact 4-5 (Draft EIR pages 4-9 and 4-10) concludes that the project would not result in a considerable contribution to any significant cumulative impact related to biological resources.

The comment also raises the question whether the surveys or sections were prepared by a qualified biologist. Although Draft EIR Chapter 7, "Report Preparers," identifies the Biologist and Senior Biologist that contributed to preparation of the Draft EIR, the commenter is correct that Section 3.5, "Biological Resources," does not specify who prepared the section and who conducted the survey. Therefore, to provide clarity, text revisions are made to Section 3.5 of the Draft EIR.

Page 3.5-1, the first paragraph is revised as follows:

> This section was prepared by an Ascent biologist and addresses biological resources known or with potential to occur on or near the project site and describes potential effects of implementation of the project on those resources.

Page 3.5-2, the fourth paragraph is revised as follows:

> An Ascent biologist conducted reconnaissance-level surveys of the project site on November 1, 2021 and June 20, 2022. The project site consists of an undeveloped parcel in the northwestern portion of the city of Fresno, approximately 0.35 mile south of the San Joaquin River. The site is surrounded by the Riverside Golf Course to the north; residential development to the west; industrial and residential development to the east; and West Herndon Avenue, commercial development, some undeveloped parcels, and the Rio Vista Middle School to the south. There is a large transmission tower in the northwest corner of the project site. No raptor nests were observed on this tower; however, several owl pellets (likely attributed to a barn owl [*Tyto alba*] or great horned owl [*Bubo virginianus*]) and California ground squirrel (*Otospermophilus beecheyi*) bones were observed under

> the tower during the reconnaissance-level survey on November 1, 2021, indicating that owls and likely other raptors use the tower as a roost site. California ground squirrel burrows are present throughout the project site and several squirrels were observed during the reconnaissance-level surveys on November 1, 2021, and June 20, 2022. There is a mound of soil directly adjacent to the northern boundary of the project site with many California ground squirrel burrows.

The commenter raises potential impacts of the proposed golf course netting on biological resources and generally references other CEQA documents prepared for projects requiring "similar netting." According to information prepared by Tanner Consulting Group, which specializes in golf course design, golf barrier netting is a woven poly material that is installed tautly, making it safe for birds to land on and making it difficult for birds to become trapped. Tanner Consulting Group has surveyed and monitored numerous golf course and driving range locations, including netting installed at the San Jose State University Men's and Woman's Golf Training Center, and reported no evidence of bird entrapment or death (see Appendix B). Importantly, the golf course already includes nets on a large stretch of its property along Riverside Drive. The City, which operates Riverside Golf Course, has not had any issues with bird or bat entanglement in the existing golf course nets along North Riverside Avenue (Berry, pers. comm., 2023). Based on experience with existing nets at this location and the testimony of industry experts with experience in other locations, the City does not anticipate significant impacts to migratory birds from the proposed netting along the Spruce Avenue extension.

**Response I103-5**

The comment includes a summary and discussion of background related to GHG and CEQA and suggests that the Draft EIR approach to assessing consistency with the City of Fresno Greenhouse Gas Reduction Plan (GHGRP) is flawed. The comment reaches two main points, which are 1) there are other GHG plans, policies, and regulations that the GHGRP may not address and 2) language in the Draft EIR suggests there is a conflict and/or inconsistency in the approach to assessing GHG.

Regarding the scope of the plans evaluated in the Draft EIR, the approach to evaluate the consistency with the GHGRP is reasonable and substantiated. The GHGRP is considered a "Qualified Plan," according to CEQA Guidelines Section 15183.5(b), and is the latest qualified plan available by the City of Fresno. Thus, it is appropriate for the City to assess whether the project complies with the requirements in the GHGRP as the measure of GHG impacts. In certain circumstances, consistency with a qualified GHG reduction plan can be used as a basis for dismissal of a project from detailed GHG emissions modeling and evaluation pursuant to CEQA Guidelines Section 15183.5. However, to do so a project must be consistent with the land use designations in the City's adopted General Plan (which are the basis for the emissions forecasts in the GHGRP). Because the project involves a General Plan amendment, the Draft EIR conservatively assumes that GHG emissions from the project could be greater with the General Plan amendment as compared to the land use designation currently adopted in the General Plan. As such, the GHGRP consistency checklist was not used in the analysis and the EIR does not streamline the evaluation of GHG emissions per Section 15183.5 of the State CEQA Guidelines.

Instead of employing the GHGRP checklist, a detailed evaluation of GHG impacts, including emissions modeling, was conducted to determine whether the project would comply with the reduction goals of the GHGRP. This modeling applies the same modeling approach as used in the GHGRP to quantifiably demonstrate that the project's design features and resulting emissions reductions would be sufficient to meet or exceed the GHGRP's reduction targets. Given the technical work and data that underlies the GHGRP, the City's decision to use this Fresno-specific threshold is supported by substantial evidence. Further, due to this demonstrated consistency, the EIR evaluation can tier from the existing programmatic review of the GHGRP's consistency with other State and local plans and regulations.

In addition, the Draft EIR includes a consistency evaluation of the 2022 Scoping Plan Update and Fresno Council of Governments (COG) 2022 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) in Appendix F of the Draft EIR. Specifically, page 42 of Appendix F includes the following discussion of consistency with statewide emissions reduction targets:

> The Project will be consistent with the state's GHG reduction goals as discussed in the 2022 CARB Scoping Plan. The Project will serve the needs of consumers in California and provide an effective and efficient means

> to shop at the warehouse, fill up a gasoline vehicle, and get a car wash all in the same location. The Project's emissions sources are regulated (and are foreseeably expected to continue to be regulated in the future) in furtherance of the State's environmental policy objectives and the Project will continue to meet those regulations to continually improve and reduce GHG emissions. Costco has a focus on sustainability, with specific measures being implemented to manage energy use across its warehouses. Costco's warehouse designs are consistent with the requirements of Leadership in Energy and Environmental Design (LEED), an internationally accepted benchmark for green building design and construction. Costco continues to improve the design and construction of its buildings, as technological advancements in these areas and building materials improve. Improved engineering and design has resulted in the use of less materials, such as columns and I-beams, while providing more strength. Costco prefers full metal buildings in order to use the maximum amount of recycled material.

Similarly, the project would be consistent with the GHG reduction goals established in the RTP/SCS (Appendix F, page 43). The analysis concludes (Appendix F, page 45):

> While the Project would represent an increase in GHG emissions when compared to the existing conditions on the vacant site, the Project would not conflict with the Fresno COG's RTP/SCS or statewide emission reduction targets in the 2022 CARB Scoping Plan Update.

As support for this conclusion, Tables C-1 and C-2 from Appendix F of the Draft EIR and provided below for reference, include detailed matrices of plan consistency.

**Table C-1. Consistency with 2022 CARB Scoping Plan Update**
Costco Commercial Center
Fresno, California

| Priority Areas | Priority GHG Reduction Strategies | Consistency |
|---|---|---|
| Transportation Electrification | Convert local government fleets to ZEVs and provide EV charging at public sites | **Consistent.** Although this goal is not applicable to an individual commercial development project, the Project includes an EV parking requirement and includes 45 installed EV spaces. |
| | Create a jurisdiction-specific ZEV ecosystem to support deployment of ZEVs statewide (such as building standards that exceed state building codes, permit streamlining, infrastructure siting, consumer education, preferential parking policies, and ZEV readiness plans) | |
| VMT Reduction | Reduce or eliminate minimum parking standards | **Consistent.** Although this goal is not applicable to an individual commercial development project, the Project is implementing neighborhood design improvements such as pedestrian network improvements and constructing bikeway facilities as part of the project. The Project also includes a redesignation from Expressway Area to Superarterial, which allows for multiple modes of travel traffic, including pedestrian and bikes. This could lead to further development of these types of non-vehicular facilities, including bike lanes and sidewalks, which are not currently allowed under the Expressway Area designation.<br><br>In addition, the Project plans to encourage employee commute trip reduction through a variety of strategies. The project will provide carpool incentives, partner with local agencies to provide vanpool services, subsidize transit passes and provide bicycle storage and locker rooms for employees who bike to work. This will reduce the employee VMT and provide incentives for employees to commute to work alternative ways. |
| | Implement Complete Streets policies and investments, consistent with general plan circulation element requirements | |
| | Increase access to public transit by increasing density of development near transit, improving transit service by increasing service frequency, creating bus priority lanes, reducing or eliminating fares, microtransit, etc. | |
| | Increase public access to clean mobility options by planning for and investing in electric shuttles, bike share, car share, and walking | |
| | Implement parking pricing or transportation demand management pricing strategies | |
| | Amend zoning or development codes to enable mixed-use, walkable, transit-oriented, and compact infill development (such as increasing the allowable density of a neighborhood) | |
| | Preserve natural and working lands by implementing land use policies that guide development toward infill areas and do not convert "greenfield" land to urban uses (e.g., green belts, strategic conservation easements) | |
| Building Decarbonization | Adopt all-electric new construction reach codes for residential and commercial uses | **Consistent.** Although this goal is not applicable to an individual commercial development project, the Project plans to use PG&E's Solar Choice program, which provides 100% solar energy to customers. In addition, to the extent applicable to the Project, the Project would meet the CalGreen Building Standards Code in effect at the time of building permit application, which would include a number of energy saving requirements. |
| | Adopt policies and incentive programs to implement energy efficiency retrofits for existing buildings, such as weatherization, lighting upgrades, and replacing energy-intensive appliances and equipment with more efficient systems (such as Energy Star-rated equipment and equipment controllers) | |
| | Adopt policies and incentive programs to electrify all appliances and equipment in existing buildings such as appliance rebates, existing building reach codes, or time of sale electrification ordinances | |
| | Facilitate deployment of renewable energy production and distribution and energy storage on privately owned land uses (e.g., permit streamlining, information sharing) | |
| | Deploy renewable energy production and energy storage directly in new public projects and on existing public facilities (e.g., solar photovoltaic systems on rooftops of municipal buildings and on canopies in public parking lots, battery storage systems in municipal buildings) | |

Abbreviations:
CalGreen - California Green Building Standards Code
CARB - California Air Resources Board
EV - electric vehicle
GHG - greenhouse gas
PG&E - Pacific Gas & Electric
VMT - vehicle miles traveled
ZEV - zero emission vehicle

**Table C-2. Consistency with Fresno Regional Transportation Plan/Sustainable Communities Strategy**
Costco Commercial Center
Fresno, California

| # | Goal | Policy | Consistency Analysis |
|---|---|---|---|
| 1 | Improved mobility and accessibility for all | Encourage and prioritize full, fair, and equitable participation by all affected communities in transportation decision-making and planning processes. | **Consistent.** Although this goal is not applicable to an individual commercial development project, it is envisioned that Project's location will provide convenient access for nearby residences for additional retail shopping experiences. In addition, the project is implementing neighborhood design improvements such as pedestrian network improvements and constructing bikeway facilities as part of the project, and will be located in close proximity to transit stops (e.g., NW Herndon-Hayes transit stop). |
| | | Actively work to ensure equitable distribution of the benefits and burdens of transportation projects. | |
| | | Promote the improvement and expansion of accessible transportation options to serve the needs of all residents, especially those who have historically faced disproportionate transportation burdens. | |
| 2 | Vibrant communities that are accessible by sustainable transportation options | Encourage alternatives to single-occupancy vehicles that reduce vehicle miles traveled (VMT) and greenhouse gas emissions. | **Consistent.** Although this goal is not applicable to an individual commercial development project, the Project includes a redesignation from Expressway Area to Superarterial, which allows for multiple modes of travel traffic, including pedestrian and bikes. This could lead to further development of these types of non-vehicular facilities, including bike lanes and sidewalks, which are not currently allowed under the Expressway Area designation.<br><br>In addition, the project is implementing neighborhood design improvements such as pedestrian network improvements and constructing bikeway facilities as part of the project. The Project will be located nearby transit facilities such as the NW Herndon-Hayes transit stop, thus allowing for alternatives to single-occupancy vehicle visits to the Project that would support efforts to improve air quality and minimize pollutants from transportation. |
| | | Support investment in and promotion of active transportation and transit to improve public health and mobility, especially in historically underinvested areas. | |
| | | Encourage sustainable development that focuses growth near activity centers and mobility options that achieve greater location efficiency. | |
| | | Support local jurisdictions' efforts to minimize the loss of farmland, environmentally sensitive areas, and natural resources | |
| | | Support local jurisdictions' efforts to facilitate the development of diverse housing choices for all income groups. | |
| | | Facilitate and promote interagency coordination and consistency across planning efforts. | |
| | | Incentivize and support efforts to improve air quality and minimize pollutants from transportation. | |
| 3 | A safe, well-maintained, efficient, and climate-resilient multimodal transportation network | Prioritize investment in and promote multimodal safety measures to reduce traffic fatalities and incidents in the region. | **Consistent.** Per the Transportation Impact Analysis, the Project would be consistent with the applicable plans, policies, and programs and would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities.<br><br>The Project plans to encourage commute trip reduction through a variety of strategies. The Project will provide carpool incentives, partner with local agencies to provide vanpool services, subsidize transit passes and provide bicycle storage and locker rooms for employees who bike to work. This will reduce the employee VMT and provide incentives for employees to commute to work alternative ways.<br><br>The Project is implementing neighborhood design improvements such as pedestrian network improvements and constructing bikeway facilities as part of the project. In addition, the Project would be located nearby to transit stops and thus would allow for utilization of existing transit facilities to visit the Project. |
| | | Promote enhanced Transportation Systems Management (TSM) and Transportation Demand Management (TDM) strategies to reduce congestion and vehicle miles traveled. | |
| | | Encourage improvements in travel connections across all modes to create an integrated, accessible, and seamless transportation network. | |
| | | Maximize the cost-effectiveness of transportation improvements. | |
| | | Encourage investments that increase the system's resilience to extreme weather events, natural disasters, and pandemics. | |
| | | Preserve and maintain existing multimodal transportation assets in a state of good repair | |
| 4 | A transportation network that supports a sustainable and vibrant economy | Support local and regional economic development by leveraging planning and transportation funds that foster public and private investment. | **Consistent.** Although this goal is not applicable to an individual commercial development project, the Project will facilitate goods movement to the Fresno area and provide approximately 165 to 175 jobs. |
| | | Facilitate efficient, reliable, resilient, and sustainable goods movement. | |
| 5 | A region embracing clean transportation, technology, and innovation | Support innovative mobility solutions that are accessible, affordable, reduce greenhouse gas emissions, and improve air quality. | **Consistent.** Although this goal is not applicable to an individual commercial development project, the Project would be located nearby to transit stops and thus would allow for utilization of existing transit facilities to visit the Project. In addition, the Project includes an EV parking requirement and includes 45 installed EV spaces. |
| | | Support efforts to expand broadband access throughout the region. | **Not Applicable.** |

Abbreviations:
EV - electric vehicle
NW - northwest
TDM - Transportation Demand Management
TSM - Transportation Systems Management
VMT - vehicle miles traveled

Thus, the concern expressed in the comment that these other plans are not addressed is unfounded. The GHG section also includes discussion of the current long-term goals of the state. The Draft EIR discusses statewide GHG emission targets, the CARB 2022 Scoping Plan, transportation-related standards and regulations in California, legislation associated with electricity generation, California Building Energy Efficiency Standards, California Integrated Waste Management Act, and California's Climate Adaptation Strategy in Section 3.7.1.

Regarding the suggestion that the Draft EIR includes logically inconsistent and/or misleading explanations regarding the GHG and VMT analyses, there is a distinction between exceeding established VMT thresholds set by the City to implement Senate Bill (SB) 743 related to transportation and conflicting with GHG reduction programs derived from SB 375 and Fresno COG's RTP/SCS. As explained further below, Appendix F of the Draft EIR properly evaluates consistency with both the CARB Scoping Plan Update (and related VMT priorities) and the Fresno COG RTP/SCS.

The evaluation of VMT in Section 3.13, "Transportation and Circulation," is based upon the City's adopted VMT threshold, which was developed to meet the State requirements set by SB 743 and address CEQA Guidelines Section 15064.3. As explained in the "Methodology," subsection (page 3.13-9), using this threshold, any net increase in total VMT would indicate a significant impact. Therefore, the transportation analysis appropriately evaluates the VMT per the City's VMT guidelines and thresholds of significance.

The GHG analysis assesses how the project is consistent with the Fresno COG RTP/SCS because this plan includes aspects that are focused on addressing GHG and climate change. As discussed above, however, the VMT analysis is not a specific criterion to this consistency analysis. The Draft EIR addresses consistency with the RTP/SCS in Table C-2 (Appendix F of Draft EIR) and finds that the project will be consistent with the overall goals of the RTP/SCS, and would not impede the implementation of the RTP/SCS. More specifically, the comment claims the Draft EIR includes a double standard in assessing consistency of the Fresno COG RTP/SCS and 2022 Scoping Plan Update. This is not accurate, as the Draft EIR fully and consistently addresses impacts and benefits within the transportation and GHG sections. What the comment claims as a double standard is a conflation of a transportation impact with GHG emissions that are inconsistent with state and local planning.

While there is a well-understood relationship between VMT and generation of GHG emissions, and generation of certain levels of VMT is used in some jurisdictions as a trigger for a detailed GHG analysis, it is not uncommon for projects that have a significant VMT impact to not exceed established GHG emissions thresholds through the application of project elements or other commitments that address sources of GHG emissions beyond VMT. In these circumstances, detailed GHG emissions modeling is conducted to forecast emissions and identify whether the total emissions would exceed GHG thresholds adopted to align with state and regional GHG reduction targets. In some cases, as with the proposed project, this detailed modeling demonstrates compliance with adopted GHG standards.

In summary, the environmental topics of VMT within a transportation analysis and of GHG emissions in a GHG section are two different things judged by two different thresholds of significance. If they were synonymous, they would not be separately evaluated. A significant VMT impact (based on local/regional travel patterns) does not equate to a significant GHG impact (based on a broader scale). The detailed modeling provided in Appendix F of the Draft EIR provides the appropriate connections between the VMT and the generation of GHG emissions. VMT as a metric does not account for vehicle characteristics, fuel type, emission standards, and fleet-level standards, all of which directly influence GHG emissions. For example, VMT generated by a gasoline vehicle is not equal to VMT by an electric vehicle because electric vehicles have zero tailpipe emissions. A similar argument can be made for hybrid vehicles and other near zero or zero emission vehicles (e.g., plug-in hybrid vehicles and fuel cell vehicles) in terms of GHG production. Thus, the GHG analysis incorporates evaluation of VMT in the GHG emissions inventory. This approach in the GHG section properly addresses the GHG emissions, not just the VMT, which is a metric to assess transportation issues as discussed above.

Similarly, the consistency analysis to the 2022 CARB Scoping Plan is an analysis specific to itself without a specific correlation to the result of the VMT analysis. As shown in the Draft EIR, the consistency with the 2022 CARB Scoping Plan assesses the project's consistency with three areas: Transportation Electrification, VMT Reduction, and Building Decarbonization. The project demonstrates consistency with these three areas through installation of 45 EV spaces, project mitigation measures and design features related to transportation, and commitment to using renewable solar

energy for the operational electricity required by the Project (see Appendix F of the Draft EIR). While the 2022 Scoping Plan notes that the State should establish guidance for regional and local agencies regarding administration of SB 743 mitigation banking/exchanges and how revenue is spent, it does not specifically note that projects must align with SB 743 in order to meet the State's emission reduction targets.

The Sierra Club v. County of Fresno case established that a reasonable effort should be made to explain the connection between exceeding a numerical threshold and effects on sensitive receptors or the environment. This relationship is not analogous to the relationship between VMT and GHG emissions. As explained above and in the Draft EIR, VMT is a component of GHG emissions modeling. The Draft EIR is compliant with the decision in the Sierra Club v. County of Fresno case.

Thus, the comment's suggestion to conflate the various criteria and issues together and insinuation of conflict between the analyses included in the Draft EIR is not correct, nor is it substantiated. For the reasons summarized above, the Draft EIR fully and adequately discloses the project's GHG impacts, including potential for policy and regulatory conflicts and inconsistencies. The Draft EIR fulfills the City's obligation under CEQA to disclose potential effects of the project and to provide the public with a meaningful opportunity to comment on the project's potential for substantial adverse environmental effects. There is no unidentified significant impact as suggested by the comment; therefore, the Draft EIR does not need to be recirculated for additional public review.

Response I103-6

The commenter indicates that requiring sound wall upgrades at existing residences may not be enforceable. Mitigation Measure 3.11-5 (Draft EIR page 3.11-29) states "sound wall construction would only be implemented if all of the property owners on the west side of North Riverside Drive between West Herndon Avenue and West Spruce Avenue collectively agree to the mitigation." As pointed out by the commenter, the sound wall upgrade is one of two options in the Draft EIR for mitigating the impact to a level that is below the threshold of significance. The other mitigation option reduces traffic noise via installation of rubberized pavement. The analysis explains that "the interior SENL [single-event noise level] at the sensitive receptor nearest to where the heavy vehicle activity could occur would be approximately 66.4 SENL. Thus, SENL's at the nearest noise-sensitive receptors would exceed 65 SENL" by 1.4 SENL. Either of the two mitigation options in Mitigation Measure 3.11-5 would result in greater reductions than required to achieve consistency with the City's noise threshold: rubberized hot-mix asphalt reduced by an average of 4 to 6 dB, while a barrier that breaks the line of sight between a source and a receiver will typically result in at least 5 dB.

It is reasonably foreseeable that affected residents would be amenable to a sound wall upgrade, which requires very little ongoing maintenance; therefore, there is good reason to include this measure. However, if affected residents decline the sound wall upgrade, the rubberized asphalt is an effective and feasible (albeit likely more expensive in the long-term) alternative mitigation measure identified in the Draft EIR. It is not uncommon or otherwise prohibited in CEQA to include multiple mitigation options, including some options where feasibility cannot be guaranteed, as long as there are equally effective feasible alternative mitigation options identified.

The text of Mitigation Measure 3.11-5 clearly states that the "project proponent shall implement noise reduction measures to ensure that exterior noise levels at residential land uses near the west side of North Riverside Drive do not exceed the City's current noise standard of 65 dB $L_{dn}$/CNEL. This performance standard can be achieved using either of the following measures." The required noise reduction is, therefore, fully enforceable because the mitigation measure provides two paths to achieving the standard if one is determined to be infeasible. Nonetheless, the following language has been added to Mitigation Measure 3.11-5 to further clarify implementation.

> Mitigation Measure 3.11-5: Implement Traffic Noise Reduction Measures along North Riverside Drive
> The project proponent shall implement noise reduction measures to ensure that exterior noise levels at residential land uses near the west side of North Riverside Drive do not exceed the City's current noise standard of 65 dB $L_{dn}$/CNEL under existing-plus-project conditions. This measure is consistent with General Plan Policy NS-1-I, which recommends the use of design alterations to reduce noise impacts. This performance standard can be achieved using either of the following measures. Therefore, if one option is not implemented, the other would be required.~~:~~

- Pave the roadway segment with rubberized hot-mix asphalt or equivalent surface treatment with known noise-reducing properties on top of the roadway surface. The rubberized hot-mix asphalt overlay shall be designed with appropriate thickness and rubber component quantity (typically 15 percent by weight of the total blend), such that traffic noise levels are reduced by an average of 4 to 6 dB (noise levels vary depending on travel speeds, meteorological conditions, and pavement quality) as compared to noise levels generated by vehicle traffic traveling on standard asphalt. Rubberized hot-mix asphalt has been found to achieve this level of noise reduction in other parts of California (Sacramento County 1999). Pavement will require more frequent than normal maintenance and repair to maintain its noise attenuation effectiveness. The applicant shall fund the incremental cost for maintaining the roadway segment with the surface treatment.
- Construct a sound barrier taller than the 6-foot cinderblock wall that is currently present from West Spruce Avenue to West Herndon Avenue. The sound barrier shall be constructed of solid material (e.g., wood, brick, adobe, an earthen berm, boulders, or combination thereof). The reflectivity of each sound barrier shall be minimized to ensure that traffic noise reflected off the barrier does not contribute to an exceedance of applicable $L_{eq}$ standards at other receptors. The level of sound reflection from a barrier can be minimized with a textured or absorptive surface or with vegetation on or next to the barrier. A barrier that breaks the line of sight between a source and a receiver will typically result in at least 5 dB of noise reduction (Caltrans 2013: 2-41; FTA 2018: 42). Barriers higher than the line of sight provide increased noise reduction (FTA 2018: 16). Scenic quality factors shall be taken into account during design, such as using more natural materials (e.g., berms and boulders) to reduce the visible mass of a wall. All barriers shall be designed to blend into the landscape along the roadway, to the extent feasible. Ensuring a character consistent with the surrounding area may involve the use of strategically placed native trees or other vegetation; the addition of special materials (e.g., wood or stonework) on the façade of the sound wall; and/or a sound wall that is covered in vegetation. Additionally, the sound barrier shall meet the standards established in General Plan Policy NS-1-o which establishes aesthetic considerations for sound walls including a maximum allowable height of 15 feet. If the sound barriers ensure that exterior traffic noise levels on the residential properties would not exceed 60 dB $L_{eq}$, then the applicant shall not be required to pave the roadway with a special low-noise surface treatment. Sound wall construction would only be implemented if all of the property owners on the west side of North Riverside Drive between West Herndon Avenue and West Spruce Avenue collectively agree to the mitigation.

Response I103-7

The comment summarizes the transportation impacts identified as significant and unavoidable in the draft EIR, and reiterates comments regarding the relationship between VMT and GHG emissions, which are addressed above in Response I130-5.

Regarding transportation safety impacts, the comment speculates that the impact could be more severe than disclosed in the Draft EIR due to the proximity of railroad tracks to the intersection North Golden State Boulevard and West Herndon Avenue and the "heightened risk on train-on-car collisions." Existing and proposed rail infrastructure was considered in the Transportation Impact Analysis (Draft EIR Appendix D). Additional traffic generated by the proposed Costco is anticipated to result in vehicle queues that extend from the intersection of North Golden State Boulevard and West Herndon Avenue to the east, past the intersection of West Herndon Avenue and Webber Avenue. The traffic modeling accounted for the railroad tracks and existing cross protection at the at-grade crossing of West Herndon Avenue. There is a space for approximately three cars between the North Golden State Boulevard and West Herndon Avenue intersection and the arm gates; as a result, traffic queues east of the arm gates in the current condition. The arm gates provide advanced warning and lower to restrict vehicular access when activated by an approaching train. The proposed Costco Commercial center would not include design features or incompatible uses that would increase the potential for motorists to queue within the arm gates for the railroad track such that a substantial increase in the potential for train-on-car collisions would occur. As explained in the Transportation Impact Analysis and summarized in the Draft EIR, the potential for increased safety hazards would occur east of the railroad tracks at the intersection of West Herndon Avenue and Weber Avenue. To address the potential for westbound traffic

to queue through the intersection, "DO NOT BLOCK" pavement markings would be added along the full width of Weber Avenue and signal phasing would be revised to optimize green-time allocation.

The comment suggests that an offsite alternative should have been evaluated for potential to reduce the identified queuing impacts. As discussed further in Response I130-8, the Draft EIR discusses three off-site alternatives. The offsite locations evaluated at North Riverside Drive and Veterans Boulevard and at Bullard Avenue and Veterans Boulevard would not have primary access from West Herndon Avenue. This may address the queuing impacts at the intersection North Golden State Boulevard and West Herndon Avenue identified in the Draft EIR. However, these locations would also be proximate to the existing rail line, and queuing impacts could occur in the alternative locations.

The comment suggests that West Herndon Avenue would be the primary roadway used to access the proposed Costco site, assumed to be preferred over Veterans Boulevard due to distance. The Transportation Impact Analysis also reflects this assumption (see Appendix D to the Draft EIR).

Finally, the comment suggests consideration of a mitigation measure that would condition operation of the proposed Costco on completion of the grade-separated rail crossing of West Herndon Avenue between North Golden State Boulevard and North Webber Avenue, which the comment suggests may improve circulation and reduce the queuing concerns identified in the Draft EIR. As acknowledged in the comment, this work is being completed by the California High Speed Rail Authority; the City and applicant have no control over the timing or outcome. This is not feasible mitigation for the City to impose because it would introduce unreasonable uncertainty given that the City has no jurisdiction over the implementation of the rail crossing and cannot ensure that it is completed in a timely fashion (or completed at all). Further, there is no clear evidence that the rail crossing improvements would improve the roadway operations impacts identified in the Draft EIR.

Response I103-8

The comment raises issues with the Draft EIR's alternatives analysis, specifically related to the evaluation of off-site alternatives. The Draft EIR includes a discussion of off-site alternatives, including those identified in a previous correspondence submitted by the commenter, starting on page 6-4. The Draft EIR examines three potential off-site alternative locations for the project: Southeast Corner of West Herndon Avenue and Hayes Avenue; Area West of North Riverside Drive and North of Veterans Boulevard; and Area West of Bullard Avenue and South of Veterans Boulevard. The Draft EIR concludes (page 6-4) that, due primarily to potential infeasibility and because they would not clearly address the project's significant environmental effects, none of these off-site alternative locations are carried forward into the full evaluation of project alternatives.

The commenter suggests that dismissal of these off-site alternatives was "improper" because it "precluded the opportunity to meaningfully contextualize at least one of the significant and unavoidable impacts (transportation safety hazards from queuing) and illustrate the ability and feasibility of reducing or avoiding significant and unavoidable impacts associated with the project." The commenter then provides several selections from the CEQA Guidelines with various phrases underlined for emphasis. However, nearly all of the commenter's arguments are contingent on the assumption that the off-site alternatives are appropriate for inclusion in the detailed alternatives evaluation. As mentioned above, the Draft EIR includes substantial evidence that these off-site alternatives are infeasible. CEQA requires project alternatives to be feasible. CEQA defines "feasible" in California Public Resources Code (PRC) Section 210610.1: "Feasible" means capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social, and technological factors. Once an alternative is determined to be infeasible, it is not required to be evaluated in the EIR, and all other arguments for why it should be included become moot. Several examples where CEQA requires alternatives to be feasible are provided below (with underlines added for emphasis):

- PRC Section 21002. The Legislature finds and declares that it 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, and that the procedures required by this division are 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. The Legislature further finds and declares that in the event specific economic, social, or other conditions make infeasible such project alternatives or such mitigation measures, individual projects may be approved in spite of one or more significant effects thereof.

- **PRC Section 21003.** The Legislature further finds and declares that it is the policy of the state that: (c) Environmental impact reports omit unnecessary descriptions of projects and emphasize feasible mitigation measures and feasible alternatives to projects.
- **California Code of Regulations (CCR) Section 15126.6(a).** Alternatives to the Proposed Project. An EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives. An EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation. An EIR is not required to consider alternatives which are infeasible. The lead agency is responsible for selecting a range of project alternatives for examination and must publicly disclose its reasoning for selecting those alternatives. There is no ironclad rule governing the nature or scope of the alternatives to be discussed other than the rule of reason.
- **CCR Section 15126.6(c).** Selection of a range of reasonable alternatives. The range of potential alternatives to the proposed project shall include those that could feasibly accomplish most of the basic objectives of the project and could avoid or substantially lessen one or more of the significant effects. The EIR should briefly describe the rationale for selecting the alternatives to be discussed. The EIR should also identify any alternatives that were considered by the lead agency but were rejected as infeasible during the scoping process and briefly explain the reasons underlying the lead agency's determination. Additional information explaining the choice of alternatives may be included in the administrative record. Among the factors that may be used to eliminate alternatives from detailed consideration in an EIR are:(i) failure to meet most of the basic project objectives, (ii) infeasibility, or (iii) inability to avoid significant environmental impacts.

The commenter disputes the Draft EIR's infeasibility conclusions, suggesting that an off-site alternative should be "considered feasible enough" to be included in the detailed alternatives evaluation, rather than being rejected. "Feasible enough" is not a concept in CEQA—alternatives are considered either "potentially feasible" or "infeasible." The commenter refutes several reasons for infeasibility identified in the Draft EIR, including site access issues, physical obstacles such as power lines, incompatible general plan designations and zoning, State restrictions on downzoning residentially designated property, as well as site ownership and acquisition issues. The commenter minimizes these issues by suggesting, in many cases, that the proposed project site shares similar constraints; however, the comparison with the project site is not thorough enough to draw the conclusions reached by the commenter. For example, the commenter equates the power line constraints associated with the site located at the southeast corner of West Herdon Avenue and Hayes Avenue with the power line constraints at the proposed project site. The constraints posed by the power lines at these two sites are not equivalent. Whereas the power lines at the proposed project site pass through a small section of the northeast corner of the rectangular site leaving the vast majority of the site unconstrained, the power lines at the alternative site completely bisect the oblong, triangular site, creating significant constraints for placement of large buildings and other tall structures, such as light standards. Another example is the commenter's suggestion that the City could avoid violating SB 330 by "rebalancing housing unit allocations," suggesting that the City of Freno already "facilitates SB 330 musical chairs," and that this process would be similar to the proposed General Plan amendment and Rezone. This is far oversimplified. In order to "rebalance" the housing allocations, the City would need to rezone other properties, which would involve other property owners and stakeholders and potential unknown environmental impacts associated with changes in allowed use and/or intensity. Such a proposal for a single private development would be highly unusual. Finally, the commenter cites CEQA Guidelines Section 15126.6 and suggests that cost and lack of ownership should not be reasons to dismiss alternatives; however, Section 15126.6(f)(1) describes the considerations for feasibility of alternatives and states among

the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries (projects with a regionally significant impact should consider the regional context), and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site (or the site is already owned by the proponent). The same section also stipulates that "no one of these factors establishes a strict limit on the scope of reasonable alternatives." It should be noted that multiple reasons for infeasibility are provided in the Draft EIR for each of the offsite alternatives. Furthermore, the commenter does not address many of the other reasons for infeasibility identified in the Draft EIR, including parcels on the same site being under different ownership, including by FMFCD; FMFCD easements bisecting a site; and obstacles to site access associated with a grade-separated overpass.

Interestingly, the commenter offers a court case to substantiate the critique of the Draft EIR's alternatives analysis: *We Advocate Through Environmental Review, et al v. County of Siskiyou*. The commenter indicates that this case relates to narrowly defined objectives; however, the commenter then admits that the Draft EIR's objectives are not written narrowly but suggests that the Draft EIR's off-site alternatives analysis has the same "end-effect" in that the outcome was a "mere formality." The Draft EIR follows CEQA's guidance for consideration of alternatives, including CEQA's specific guidance for alternative locations as provided in State CEQA Guidelines Section 15126[f][2], as follows:

(A) Key question. The key question and first step in analysis is whether any of the significant effects of the project would be avoided or substantially lessened by putting the project in another location. Only locations that would avoid or substantially lessen any of the significant effects of the project need be considered for inclusion in the EIR.

(B) None feasible. If the lead agency concludes that no feasible alternative locations exist, it must disclose the reasons for this conclusion, and should include the reasons in the EIR. For example, in some cases there may be no feasible alternative locations for a geothermal plant or mining project which must be in close proximity to natural resources at a given location.

(C) Limited new analysis required. Where a previous document has sufficiently analyzed a range of reasonable alternative locations and environmental impacts for projects with the same basic purpose, the lead agency should review the previous document. The EIR may rely on the previous document to help it assess the feasibility of potential project alternatives to the extent the circumstances remain substantially the same as they relate to the alternative. (*Citizens of Goleta Valley v. Board of Supervisors (1990) 52 Cal.3d 553, 573*).

First, regarding item "A," the Draft EIR considers the "key question": would any of the project's significant effects be avoided? Each of the Draft EIR's off-site alternatives discussions include a robust discussion on this point. Second, regarding item "B," the Draft EIR considers the feasibility of these off-site alternatives, as described in detail above. Finally, regarding item "C," no previous document evaluated a range of reasonable alternative locations. Not only does the referenced court case (by the commenter's own admission) have nothing to do with the off-site alternatives issue, but the commenter's attempt to tie the general lesson from the case—that alternatives evaluation should not be a mere formality—to the Draft EIR does not work as the Draft EIR follows CEQA's requirements for considering off-site alternatives.

Importantly, in addition to considering and dismissing three off-site alternatives and two additional alternatives, the Draft EIR includes a detailed alternatives evaluation that considers a reasonable range of alternatives, including two No Project Alternatives and two alternatives to the project focused specifically on reducing significant impacts of the project.

It should also be noted that the commenter indicates that his comments were not included in Appendix A of the Draft EIR. The NOP was released October 22, 2021 for a 30-day comment period. The referenced correspondence was an email dated March 30, 2022 (4 months after the close of the comment period). Although the letter was not included in the appendix with the comments received on the NOP, the comments provided were considered during preparation of the Draft EIR, as stated on page 6-4 of the Draft EIR.

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# 3 REVISIONS TO THE DRAFT EIR

This chapter presents specific text changes made to the Draft EIR since its publication and public review. The changes are presented in the order in which they appear in the original Draft EIR and are identified by the Draft EIR page number. Text deletions are shown in ~~strikethrough~~, and text additions are shown in underline.

The information contained within this chapter clarifies and expands on information in the Draft EIR and does not constitute "significant new information" requiring recirculation. (See also Public Resources Code Section 21092.1; CEQA Guidelines Section 15088.5.)

## Revisions to "Executive Summary"

The first sentence in Section ES.2.4, "Characteristics of the Project," on page ES-2 is revised as follows to reflect the revised site plan:

> The proposed Costco building would occupy ~~241,342~~ 219,126 square feet, of which approximately 24,000 square feet would be reserved for storage and receiving.

## Revisions to Chapter 2, "Project Description"

Table 2-1 on page 2-10 is revised as follows to reflect the revised site plan:

**Table 2-1 Project Elements**

| Structure | Area (square feet) |
|---|---|
| **Warehouse Retail Building Footprint** | **~~241,342~~ 219,216** |
| Warehouse/Retail | ~~162,264~~ 163,539 |
| Loading/Back of house/Storage/Receiving | ~~23,881~~ 4,422 |
| Market delivery operation | 46,834 |
| Open canopy space | ~~5,126~~ 3,233 |
| Building envelope | ~~2,9555~~ 1,188 |
| **Fuel canopy** | **12,885** |
| **Car wash** | **4,800** |

Source: Data provided by Urban Planning Partners in 2022 and 2023.

The first sentence on page 2-13 under the heading "Costco Warehouse Building" is revised as follows to reflect the revised site plan:

> The proposed warehouse would occupy ~~241,342~~ 219,126 square feet of which approximately 24,000 square feet would be reserved for storage and receiving.

The description under the heading "Parking" on page 2-14 is revised as follows to reflect the revised site plan:

> The project includes ~~889~~ 873 total parking stalls, which meets the City of Fresno's minimum parking requirements for the project. These parking stalls would include a total of ~~21~~ 25 accessible spaces and ~~53~~ 92 electric vehicle-ready parking stalls. The design would be in compliance with City and Americans with Disabilities Act (ADA) requirements. The project also would provide bicycle parking in accordance with the City's Citywide Development Code.

To provide clarification, the second paragraph of Section 2.2.4, "Construction," on page 2-19 of the Draft EIR is revised as follows:

> Table 2-2 lists equipment anticipated to be used during construction. All equipment used for construction would have Tier 3 engines with diesel particulate filters. In addition, approximately 325 loads of aggregate base would be imported onto the project site and approximately 3,000 cubic yards of utility and foundation spoils would be off hauled. Grading of the project site would be otherwise balanced and would not require additional import or export of soils. All staging would occur on the project site. Trucks would enter the project site from North Riverside Drive and exit the site via North Arthur Avenue.

The first bullet on page 2-22, which describes the entitlements requested from the City is revised to read:

- Approve a Conditional Use Permit to construct a ±~~241,342~~ 219,126 square-foot, warehouse retail building with a ±4,800 square-foot car wash; and an ±13,000 square-foot, 32-station fuel canopy.

## Revisions to Section 3.1, "Aesthetics"

The first sentence under Impact 3.1-1 on page 3.1-6 is revised as follows to reflect the revised site plan:

> The project would construct an approximately ~~241,342~~ 219,126-square-foot single story, contemporary-style retail building in the southeast corner of the project site, and a car wash and fueling stations along the northern portions of the site.

## Revisions to Section 3.5, "Biological Resources"

To provide clarification, the first paragraph on page 3.5-1 of the Draft EIR is revised as follows:

> This section was prepared by an Ascent biologist and addresses biological resources known or with potential to occur on or near the project site and describes potential effects of implementation of the project on those resources.

In addition, the fourth paragraph on page 3.5-2 of the Draft EIR is revised as follows:

> An Ascent biologist conducted reconnaissance-level surveys of the project site on November 1, 2021 and June 20, 2022. The project site consists of an undeveloped parcel in the northwestern portion of the city of Fresno, approximately 0.35 mile south of the San Joaquin River. The site is surrounded by the Riverside Golf Course to the north; residential development to the west; industrial and residential development to the east; and West Herndon Avenue, commercial development, some undeveloped parcels, and the Rio Vista Middle School to the south. There is a large transmission tower in the northwest corner of the project site. No raptor nests were observed on this tower; however, several owl pellets (likely attributed to a barn owl [*Tyto alba*] or great horned owl [*Bubo virginianus*]) and California ground squirrel (*Otospermophilus beecheyi*) bones were observed under the tower during the reconnaissance-level survey on November 1, 2021, indicating that owls and likely other raptors use the tower as a roost site. California ground squirrel burrows are present throughout the project site and several squirrels were observed during the reconnaissance-level surveys on November 1, 2021, and June 20, 2022. There is a mound of soil directly adjacent to the northern boundary of the project site with many California ground squirrel burrows.

## Revisions to Section 3.11, "Noise and Vibration"

The first sentence under the subheading "Parking and Gas Station" on page 3.11-23 is revised as following to reflect the revised site plan:

> Based on the current conceptual plan the proposed project would include ~~829~~ 873 parking spaces to accommodate Costco members and employees.

The following language has been added to Mitigation Measure 3.11-5 on page 3.11-29 to further clarify implementation.

### Mitigation Measure 3.11-5: Implement Traffic Noise Reduction Measures along North Riverside Drive

The project proponent shall implement noise reduction measures to ensure that exterior noise levels at residential land uses near the west side of North Riverside Drive do not exceed the City's current noise standard of 65 dB $L_{dn}$/CNEL under existing-plus-project conditions. This measure is consistent with General Plan Policy NS-1-I, which recommends the use of design alterations to reduce noise impacts. This performance standard can be achieved using either of the following measures. Therefore, if one option is not implemented, the other would be required.~~:~~

- Pave the roadway segment with rubberized hot-mix asphalt or equivalent surface treatment with known noise-reducing properties on top of the roadway surface. The rubberized hot-mix asphalt overlay shall be designed with appropriate thickness and rubber component quantity (typically 15 percent by weight of the total blend), such that traffic noise levels are reduced by an average of 4 to 6 dB (noise levels vary depending on travel speeds, meteorological conditions, and pavement quality) as compared to noise levels generated by vehicle traffic traveling on standard asphalt. Rubberized hot-mix asphalt has been found to achieve this level of noise reduction in other parts of California (Sacramento County 1999). Pavement will require more frequent than normal maintenance and repair to maintain its noise attenuation effectiveness. The applicant shall fund the incremental cost for maintaining the roadway segment with the surface treatment.
- Construct a sound barrier taller than the 6-foot cinderblock wall that is currently present from West Spruce Avenue to West Herndon Avenue. The sound barrier shall be constructed of solid material (e.g., wood, brick, adobe, an earthen berm, boulders, or combination thereof). The reflectivity of each sound barrier shall be minimized to ensure that traffic noise reflected off the barrier does not contribute to an exceedance of applicable $L_{eq}$ standards at other receptors. The level of sound reflection from a barrier can be minimized with a textured or absorptive surface or with vegetation on or next to the barrier. A barrier that breaks the line of sight between a source and a receiver will typically result in at least 5 dB of noise reduction (Caltrans 2013: 2-41; FTA 2018: 42). Barriers higher than the line of sight provide increased noise reduction (FTA 2018: 16). Scenic quality factors shall be taken into account during design, such as using more natural materials (e.g., berms and boulders) to reduce the visible mass of a wall. All barriers shall be designed to blend into the landscape along the roadway, to the extent feasible. Ensuring a character consistent with the surrounding area may involve the use of strategically placed native trees or other vegetation; the addition of special materials (e.g., wood or stonework) on the façade of the sound wall; and/or a sound wall that is covered in vegetation. Additionally, the sound barrier shall meet the standards established in General Plan Policy NS-1-o which establishes aesthetic considerations for sound walls including a maximum allowable height of 15 feet. If the sound barriers ensure that exterior traffic noise levels on the residential properties would not exceed 60 dB $L_{eq}$, then the applicant shall not be required to pave the roadway with a special low-noise surface treatment. Sound wall construction would only be implemented if all of the property owners on the west side of North Riverside Drive between West Herndon Avenue and West Spruce Avenue collectively agree to the mitigation.

## Revisions to Section 3.13, "Transportation and Circulation"

The text of Mitigation Measure 3.13-2 beginning on page 3.13-15 of the Draft EIR is revised as follows:

### Mitigation Measures

Table 3.13-3 presents the most recent California Air Pollution Control Officers Association (CAPCOA) *Handbook for Analyzing GHG Emission Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equity* (Handbook) measures for reducing greenhouse gas emissions within the transportation sector. Most of the measures quantified in the CAPCOA Handbook aim to reduce VMT and encourage mode shifts from single-occupancy vehicles to shared (e.g., transit) or active modes of transportation (e.g., bicycle)

(CAPCOA 2021). Although all transportation measures are provided below, not all are applicable or feasible given the implementation scale, nature of the proposed project, and/or limited jurisdictional authority of Costco, the applicant, to implement particular measures. The following mitigation measure~~s have been proposed~~ is based on the analysis of feasibility and applicability included in Table 3.13-5.

**Table 3.13-5 Transportation Sector Measures to Reduce VMT**

| | Mitigation Measure | Maximum Potential VMT Reduction[1] | Feasible/Applicable to the project? | Notes |
|---|---|---|---|---|
| T-1 | Increase Residential Density | 30% from project VMT | N/A | The proposed project does not include residential uses. |
| T-2 | Increase Job Density | 30% from project VMT | N/A | This is a plan/communitywide strategy and is not applicable. |
| T-3 | Provide Transit-Oriented Development | 31% from project VMT | N/A | This is a plan/communitywide strategy and is not applicable. |
| T-4 | Integrate Affordable and Below Market Rate Housing | 28.6% from project/site multifamily residential VMT | N/A | The proposed project does not include residential uses. |
| T-5 | Implement Commute Trip Reduction Program (Voluntary) | 4% project/site employee commute VMT | ~~Yes~~ No | ~~See Mitigation Measure 3.13-2 below.~~ Measures T-7 through T-11 must be implemented as part of T-5 to achieve the maximum employee commute VMT reduction. Because T-11 would not be feasible, the commute trip reduction program would not meet the full list of CAPCOA parameters. |
| T-6 | Implement Commute Trip Reduction Program (Mandatory Implementation and Monitoring) | 26% from project/site employee commute VMT | ~~Yes~~ No | ~~See Mitigation Measure 3.13-2 below.~~ Measures T-7 through T-11 must be implemented as part of T-6 to achieve the maximum employee commute VMT reduction. Because T-11 would not be feasible, the commute trip reduction program would not meet the full list of CAPCOA parameters. |
| T-7 | Implement Commute Trip Reduction Marketing | 4% project/site employee commute VMT | Yes | See Mitigation Measure 3.13-2 below. |
| T-8 | Provide Ridesharing Program | 8% project/site employee commute VMT | Yes | See Mitigation Measure 3.13-2 below. |
| T-9 | Implement Subsidized or Discounted Transit Program | 5.5% from employee/resident | Yes | See Mitigation Measure 3.13-2 below. |
| T-10 | Provide End-of-Trip Bicycle Facilities | 4.4% project/site employee commute VMT | Yes | See Mitigation Measure 3.13-2 below. |
| T-11 | Provide Employer-Sponsored Vanpool | 20.4% project/site employee commute VMT | ~~Yes~~ No | ~~See Mitigation Measure 3.13-2 below.~~ A private vanpool program would involve the capital cost of purchasing vas plus the operating cost of insurances, would raise liability concerns, and would pose logistical challenges such as equal treatment of |

| | Mitigation Measure | Maximum Potential VMT Reduction[1] | Feasible/Applicable to the project? | Notes |
|---|---|---|---|---|
| | | | | employees and rules regarding private use of the vans. This measure cannot be feasibly implemented to reduce VMT. |
| T-12 | Price Workplace Parking | 20% project/site employee commute VMT | N/A | Measure ineffective due to readily available, uncontrolled and free parking in the immediate vicinity of the proposed project. |
| T-13 | Implement Employee Parking Cash-Out | 12% project/site employee commute VMT | N/A | Measure ineffective due to readily available, uncontrolled and free parking in the immediate vicinity of the proposed project. |
| T-14 | Provide Electric Vehicle Charging Infrastructure | -- | N/A | See Mitigation Measure 3.3-2a. This measure does not affect VMT. |
| T-15 | Limit Residential Parking Supply | 13.7% from residences' VMT | N/A | The proposed project does not include residential uses. |
| T-16 | Unbundle Residential Parking Costs from Property Cost | 15.7% from project VMT | N/A | The proposed project does not include residential uses. |
| T-17 | Improve Street Connectivity | 30% from vehicle travel in the plan/community | Yes | The proposed project would construct West Spruce Avenue along the northern project site boundary improving street connectivity. Additionally, the project would construct North Arthur Avenue along the eastern project site boundary, connecting West Spruce Avenue and West ~~Spruce~~ Herndon Avenue. See Chapter 2, "Project Description~~.~~," and Mitigation Measure 3.13-2 below. |
| T-18 | Provide Pedestrian Network Improvement | 6.4% from vehicle travel in the plan/community | Yes | Pedestrian facility improvements provided as part of the proposed project. See Chapter 2, "Project Description~~.~~," and Mitigation Measure 3.13-2 below. |
| T-19-A | Construct or Improve Bike Facility | 0.8% from vehicles parallel roadways | Yes | Bicycle facility improvements provided as part of the proposed project. See Chapter 2, "Project Description~~.~~," and Mitigation Measure 3.13-2 below. |
| T-19-B | Construct or Improve Bike Boulevard | 0.2% from vehicles on roadway | Yes | Bicycle facility improvements provided as part of the proposed project. See Chapter 2, "Project Description~~.~~," and Mitigation Measure 3.13-2 below. |
| T-20 | Expand Bikeway Network | 0.5% from vehicles on roadway | Yes | Bicycle facility improvements provided as part of the proposed project. See Chapter 2, "Project Description~~.~~," and Mitigation Measure 3.13-2 below. |

| | Mitigation Measure | Maximum Potential VMT Reduction[1] | Feasible/Applicable to the project? | Notes |
|---|---|---|---|---|
| T-21-A | Implement Conventional Carshare Program | 0.15% from vehicle travel in the plan/community | No | This is a plan/communitywide strategy and is not feasible. |
| T-21-B | Implement Electric Carshare Program | VMT reduction not quantified—see CAPCOA handbook | No | This is a plan/communitywide strategy and is not feasible. |
| T-22-A | Implement Pedal (Non-Electric) Bikeshare Program | 0.2% from vehicle travel in the plan/community | No | This is a plan/communitywide strategy and is not feasible. |
| T-22-B | Implement Electric Bikeshare Program | 0.06% from vehicle travel in the plan/community | No | This is a plan/communitywide strategy and is not feasible. |
| T-22-C | Implement Scootershare Program | 0.07% from vehicle travel in the plan/community | No | This is a plan/communitywide strategy and is not feasible. |
| T-23 | Provide Community-Based Travel Planning | 2.3% from vehicle travel in the plan/community | N/A | The proposed project does not include residential uses. This measure applies to residences. |
| T-24 | Implement Market Price Public Parking (On-Street) | 30% from vehicle travel in the plan/community | No | The applicant, Costco, does not have jurisdiction over public on-street parking facilities and operation. |
| T-25 | Extend Transit Network Coverage or Hours | 4.6% from vehicle travel in the plan/community | No | The applicant, Costco, does not have jurisdiction over the operation of transit service. |
| T-26 | Increase Transit Service Frequency | 11.3% from vehicle travel in the plan/community | No | The applicant, Costco, does not have jurisdiction over the operation of transit service. |
| T-27 | Implement Transit-Supportive Roadway Treatments | 0.6% from vehicle travel in the plan/community | No | This is a plan/communitywide strategy and is not feasible. |
| T-28 | Provide Bus Rapid Transit | 13.8% from vehicle travel in the plan/community | No | The applicant, Costco, does not have jurisdiction over the operation of transit service. |
| T-29 | Reduce Transit Fares | 1.2% from vehicle travel in the plan/community | No | This is a plan/communitywide strategy and is not feasible. |
| T-30 | Use Cleaner-Fuel Vehicles | -- | N/A | This measure does not affect VMT. |

Notes:

1: The CAPCOA Handbook identifies the maximum potential GHG reduction associated with identified measures; however, the CAPCOA Handbook concludes that for the particular measures selected, the percent reduction in VMT would be the same as the percent reduction in GHG emissions. For clarity, this table reports reductions in relation to VMT.

VMT = Vehicle Miles Traveled; N/A = not applicable

Source: Mitigation Measures and VMT Reduction Potential provided by CAPCOA 2021 *Handbook for Analyzing Greenhouse Gas Emissions Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equity*

### Mitigation Measure 3.13-2: Provide a ~~Mandatory Commute Reduction~~ Program ~~for~~ to Reduce Costco Employees' VMT by at least 26 Percent

Costco shall provide a ~~Mandatory Commute Reduction~~ program ~~for employees~~ that is designed to achieve~~s~~ at least a 26 percent reduction in employee VMT. The ~~commute reduction~~ program shall be provided to the City for ~~approval~~ acceptance prior to issuance of a certificate of occupancy. Specific actions ~~may~~ must include the following measures described in the California Air Pollution Control Officers Association's 2021 *Handbook*

*for Analyzing Greenhouse Gas Emission Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equity* ~~*Quantifying Greenhouse Gas Mitigation Measures Handbook*~~:

- Commute Trip Reduction Marketing (estimated to result in up to 4 percent employee VMT reduction): Costco shall implement a marketing strategy to promote Costco's commute reduction program. Information sharing and marketing promote and educate employees about their travel choices to the employment location beyond driving such as carpooling, taking transit, walking, and biking, thereby reducing VMT and greenhouse gas emissions. The following features (or similar alternatives) shall be provided:
  - on-site or online commuter information services,
  - employee transportation coordinators,
  - on-site or online transit pass sales, and
  - guaranteed ride home service.
- Provide Ridesharing Program (estimated to result in up to 8 percent employee VMT reduction): Costco shall develop and implement a ridesharing program. Ridesharing encourages carpooled vehicle trips in place of single-occupied vehicle trips, thereby reducing the number of trips, VMT, and greenhouse gas emissions. The following strategies provide examples of a multifaceted approach for promoting a rideshare program:
  - designating a certain percentage of desirable parking spaces for ridesharing vehicles,
  - designating adequate passenger loading and unloading and waiting areas for ridesharing vehicles, and
  - providing an app or website for coordinating rides.
- Implement Subsidized or Discount Transit Program (estimated to result in up to 5.5 percent employee VMT reduction): Costco shall provide free transit passes for employees. Reducing the out-of-pocket cost for choosing transit improves the competitiveness of transit against driving, increasing the total number of transit trips and decreasing vehicle trips. This decrease in vehicle trips results in reduced VMT and, thus, a reduction in greenhouse gas emissions.
- Provide End-of-Trip Bicycle Facilities (estimated to result in up to 4.4 percent employee VMT reduction): Costco shall install and maintain end-of-trip facilities for employee use. End-of-trip facilities include elements such as bike parking, bike lockers, showers, and personal lockers. The provision and maintenance of secure bike parking and related facilities encourages commuting by bicycle, thereby reducing VMT and greenhouse gas emissions.
- ~~Provide Employer-Sponsored Vanpool (estimated to result in up to 20.4 percent employee VMT reduction): Costco shall implement an employer-sponsored vanpool program. Vanpooling is a flexible form of public transportation that provides groups of 5 to 15 people with a cost-effective and convenient rideshare option for commuting. The mode shift from long-distance, single-occupied vehicles to shared vehicles reduces overall commute VMT, thereby reducing greenhouse gas emissions (CAPCOA 2021).~~
- Improve Street Connectivity (estimated to result in up to 30 percent employee VMT reduction): Costco shall construct West Spruce Avenue along the northern site boundary, creating new connections between West Spruce Avenue and North Aurther Avenue. The increased connectivity and intersection density that would result from these improvements would facilitate shorter trips, thereby reducing VMT.

- Provide Pedestrian Network Improvements/Construct Bike Facilities/Expand Bikeway Network (estimated to result in up to 10 percent employee VMT reduction[1]): Costco shall construct new, 12-foot-wide pedestrian and bicycle paths along West Herndon Avenue and North Riverside Drive to improve pedestrian access and connect to a larger bicycle network. This encourages a mode shift from automobiles to biking and walking, resulting in VMT reduction.

## Revisions to Section 3.14, "Utilities"

The text under "Water Demand and Wastewater Output" on page 3.14-9 is revised as follows to reflect the revised site plan:

CEQA Guidelines Section 15155 requires preparation of a water supply assessment (WSA) when a project is of sufficient size to be defined as a "water-demand project." Several characteristics can deem a project a "water-demand project" including:

- A shopping center or business establishment employing more than 1,000 persons or having more than 500,000 square feet of floor space (CEQA Guidelines Section 15155(a)(1)(B).

The project is estimated to employ approximately 300 individuals, and the warehouse and gas station would encompass approximately ~~241,342~~ 232,101 square feet. It does not meet the definition of a "water demand project" pursuant to Section 15155 of the State CEQA Guidelines. Preparation of a WSA is not required for the project.

## Revisions to the Air Quality Technical Report (Draft EIR Appendix C)

The following table replaces Table F-1 in Appendix F, HARP Outputs, in Appendix C: Air Quality Technical Report of the Draft EIR:

| Receptor ID | X-Coordinate (m) | Y-Coordinate (m) | Receptor Type | Cancer Risk (in a million) | Chronic Hazard Index | Acute Hazard Index |
|---|---|---|---|---|---|---|
| 1 | 240425.00 | 4080650.00 | Worker | 0.01 | 7.73E-04 | 0.00E+00 |
| 3 | 240475.00 | 4080650.00 | Worker | 0.01 | 9.28E-04 | 0.00E+00 |
| 4 | 240500.00 | 4080650.00 | Worker | 0.01 | 1.03E-03 | 0.00E+00 |
| 13 | 240725.00 | 4080650.00 | Worker | 0.02 | 1.94E-03 | 0.00E+00 |
| 14 | 240750.00 | 4080650.00 | Worker | 0.02 | 1.91E-03 | 0.00E+00 |
| 15 | 240400.00 | 4080675.00 | Worker | 0.01 | 8.49E-04 | 0.00E+00 |
| 16 | 240425.00 | 4080675.00 | Worker | 0.01 | 9.37E-04 | 0.00E+00 |
| 18 | 240475.00 | 4080675.00 | Worker | 0.02 | 1.17E-03 | 0.00E+00 |
| 19 | 240500.00 | 4080675.00 | Worker | 0.02 | 1.35E-03 | 0.00E+00 |
| 28 | 240725.00 | 4080675.00 | Worker | 0.03 | 2.43E-03 | 0.00E+00 |
| 29 | 240750.00 | 4080675.00 | Worker | 0.03 | 2.31E-03 | 0.00E+00 |
| 30 | 240775.00 | 4080675.00 | Worker | 0.03 | 2.12E-03 | 0.00E+00 |
| 32 | 240400.00 | 4080700.00 | Worker | 0.01 | 1.03E-03 | 0.00E+00 |
| 33 | 240425.00 | 4080700.00 | Worker | 0.01 | 1.16E-03 | 0.00E+00 |
| 35 | 240475.00 | 4080700.00 | Worker | 0.02 | 1.55E-03 | 0.00E+00 |
| 36 | 240500.00 | 4080700.00 | Worker | 0.02 | 1.91E-03 | 0.00E+00 |
| 67 | 240375.00 | 4080750.00 | Residential | 0.51 | 1.18E-03 | 0.00E+00 |
| 75 | 240375.00 | 4080775.00 | Residential | 0.58 | 1.33E-03 | 0.00E+00 |

[1] Measures T-18 through T-22-C are in the Neighborhood Design subsector. The VMT reduction from the combined implementation of all measures within this subsector is capped at 10 percent (CAPCOA 2021: 135).

| Receptor ID | X-Coordinate (m) | Y-Coordinate (m) | Receptor Type | Cancer Risk (in a million) | Chronic Hazard Index | Acute Hazard Index |
|---|---|---|---|---|---|---|
| 76 | 240400.00 | 4080775.00 | Residential | 0.70 | 1.61E-03 | 0.00E+00 |
| 77 | 240425.00 | 4080775.00 | Residential | 0.89 | 2.04E-03 | 0.00E+00 |
| 83 | 240375.00 | 4080800.00 | Residential | 0.64 | 1.48E-03 | 0.00E+00 |
| 84 | 240400.00 | 4080800.00 | Residential | 0.79 | 1.83E-03 | 0.00E+00 |
| 85 | 240425.00 | 4080800.00 | Residential | 1.03 | 2.37E-03 | 0.00E+00 |
| 91 | 240375.00 | 4080825.00 | Residential | 0.70 | 1.61E-03 | 0.00E+00 |
| 92 | 240400.00 | 4080825.00 | Residential | 0.88 | 2.02E-03 | 0.00E+00 |
| 93 | 240425.00 | 4080825.00 | Residential | 1.15 | 2.65E-03 | 0.00E+00 |
| 99 | 240375.00 | 4080850.00 | Residential | 0.75 | 1.73E-03 | 0.00E+00 |
| 100 | 240400.00 | 4080850.00 | Residential | 0.94 | 2.16E-03 | 0.00E+00 |
| 101 | 240425.00 | 4080850.00 | Residential | 1.23 | 2.83E-03 | 0.00E+00 |
| 108 | 240400.00 | 4080875.00 | Residential | 0.98 | 2.26E-03 | 0.00E+00 |
| 109 | 240425.00 | 4080875.00 | Residential | 1.28 | 2.93E-03 | 0.00E+00 |
| 115 | 240375.00 | 4080900.00 | Residential | 0.81 | 1.85E-03 | 0.00E+00 |
| 116 | 240400.00 | 4080900.00 | Residential | 1.01 | 2.31E-03 | 0.00E+00 |
| 117 | 240425.00 | 4080900.00 | Residential | 1.30 | 2.99E-03 | 0.00E+00 |
| 123 | 240375.00 | 4080925.00 | Residential | 0.82 | 1.88E-03 | 0.00E+00 |
| 124 | 240400.00 | 4080925.00 | Residential | 1.02 | 2.34E-03 | 0.00E+00 |
| 125 | 240425.00 | 4080925.00 | Residential | 1.31 | 3.01E-03 | 0.00E+00 |
| 139 | 240375.00 | 4080975.00 | Residential | 0.81 | 1.85E-03 | 0.00E+00 |
| 140 | 240400.00 | 4080975.00 | Residential | 1.00 | 2.30E-03 | 0.00E+00 |
| 141 | 240425.00 | 4080975.00 | Residential | 1.29 | 2.97E-03 | 0.00E+00 |
| 147 | 240375.00 | 4081000.00 | Residential | 0.78 | 1.80E-03 | 0.00E+00 |
| 148 | 240400.00 | 4081000.00 | Residential | 0.98 | 2.24E-03 | 0.00E+00 |
| 149 | 240425.00 | 4081000.00 | Residential | 1.26 | 2.90E-03 | 0.00E+00 |
| 156 | 240400.00 | 4081025.00 | Residential | 0.93 | 2.14E-03 | 0.00E+00 |
| 157 | 240425.00 | 4081025.00 | Residential | 1.21 | 2.78E-03 | 0.00E+00 |
| 163 | 240375.00 | 4081050.00 | Residential | 0.70 | 1.61E-03 | 0.00E+00 |
| 164 | 240400.00 | 4081050.00 | Residential | 0.87 | 1.99E-03 | 0.00E+00 |
| 165 | 240425.00 | 4081050.00 | Residential | 1.13 | 2.59E-03 | 0.00E+00 |
| 171 | 240375.00 | 4081075.00 | Residential | 0.64 | 1.46E-03 | 0.00E+00 |
| 172 | 240400.00 | 4081075.00 | Residential | 0.78 | 1.79E-03 | 0.00E+00 |
| 173 | 240425.00 | 4081075.00 | Residential | 1.00 | 2.29E-03 | 0.00E+00 |
| 189 | 240375.00 | 4081125.00 | Residential | 0.50 | 1.14E-03 | 0.00E+00 |
| 190 | 240400.00 | 4081125.00 | Residential | 0.57 | 1.31E-03 | 0.00E+00 |
| 191 | 240425.00 | 4081125.00 | Residential | 0.66 | 1.51E-03 | 0.00E+00 |
| 192 | 240450.00 | 4081125.00 | Worker | 0.02 | 1.72E-03 | 0.00E+00 |
| 193 | 240475.00 | 4081125.00 | Worker | 0.02 | 1.91E-03 | 0.00E+00 |

| Receptor ID | X-Coordinate (m) | Y-Coordinate (m) | Receptor Type | Cancer Risk (in a million) | Chronic Hazard Index | Acute Hazard Index |
|---|---|---|---|---|---|---|
| 194 | 240500.00 | 4081125.00 | Worker | 0.03 | 2.11E-03 | 0.00E+00 |
| 195 | 240525.00 | 4081125.00 | Worker | 0.03 | 2.24E-03 | 0.00E+00 |
| 196 | 240550.00 | 4081125.00 | Worker | 0.03 | 2.27E-03 | 0.00E+00 |
| 197 | 240575.00 | 4081125.00 | Worker | 0.03 | 2.24E-03 | 0.00E+00 |
| 207 | 240375.00 | 4081150.00 | Residential | 0.43 | 9.80E-04 | 0.00E+00 |
| 208 | 240400.00 | 4081150.00 | Residential | 0.47 | 1.09E-03 | 0.00E+00 |
| 209 | 240425.00 | 4081150.00 | Residential | 0.52 | 1.20E-03 | 0.00E+00 |
| 210 | 240450.00 | 4081150.00 | Worker | 0.02 | 1.31E-03 | 0.00E+00 |
| 211 | 240475.00 | 4081150.00 | Worker | 0.02 | 1.41E-03 | 0.00E+00 |
| 212 | 240500.00 | 4081150.00 | Worker | 0.02 | 1.49E-03 | 0.00E+00 |
| 213 | 240525.00 | 4081150.00 | Worker | 0.02 | 1.52E-03 | 0.00E+00 |
| 214 | 240550.00 | 4081150.00 | Worker | 0.02 | 1.52E-03 | 0.00E+00 |
| 215 | 240575.00 | 4081150.00 | Worker | 0.02 | 1.48E-03 | 0.00E+00 |
| 216 | 240600.00 | 4081150.00 | Worker | 0.02 | 1.40E-03 | 0.00E+00 |
| 217 | 240625.00 | 4081150.00 | Worker | 0.02 | 1.29E-03 | 0.00E+00 |
| 218 | 240650.00 | 4081150.00 | Worker | 0.01 | 1.15E-03 | 0.00E+00 |
| 219 | 240675.00 | 4081150.00 | Worker | 0.01 | 9.87E-04 | 0.00E+00 |
| 220 | 240700.00 | 4081150.00 | Worker | 0.01 | 8.14E-04 | 0.00E+00 |
| 221 | 240725.00 | 4081150.00 | Worker | 0.01 | 6.67E-04 | 0.00E+00 |
| 222 | 240750.00 | 4081150.00 | Worker | 0.01 | 5.56E-04 | 0.00E+00 |
| 223 | 240775.00 | 4081150.00 | Worker | 0.01 | 4.73E-04 | 0.00E+00 |
| 224 | 240425.00 | 4081175.00 | Residential | 0.42 | 9.69E-04 | 0.00E+00 |
| 225 | 240450.00 | 4081175.00 | Worker | 0.01 | 1.03E-03 | 0.00E+00 |
| 226 | 240475.00 | 4081175.00 | Worker | 0.01 | 1.07E-03 | 0.00E+00 |
| 227 | 240500.00 | 4081175.00 | Worker | 0.01 | 1.10E-03 | 0.00E+00 |
| 228 | 240525.00 | 4081175.00 | Worker | 0.01 | 1.10E-03 | 0.00E+00 |
| 229 | 240550.00 | 4081175.00 | Worker | 0.01 | 1.09E-03 | 0.00E+00 |
| 230 | 240575.00 | 4081175.00 | Worker | 0.01 | 1.04E-03 | 0.00E+00 |
| 231 | 240600.00 | 4081175.00 | Worker | 0.01 | 9.82E-04 | 0.00E+00 |
| 232 | 240625.00 | 4081175.00 | Worker | 0.01 | 9.03E-04 | 0.00E+00 |
| 233 | 240650.00 | 4081175.00 | Worker | 0.01 | 8.09E-04 | 0.00E+00 |
| 234 | 240675.00 | 4081175.00 | Worker | 0.01 | 7.08E-04 | 0.00E+00 |
| 235 | 240700.00 | 4081175.00 | Worker | 0.01 | 6.10E-04 | 0.00E+00 |
| 236 | 240725.00 | 4081175.00 | Worker | 0.01 | 5.24E-04 | 0.00E+00 |
| 237 | 240750.00 | 4081175.00 | Worker | 0.01 | 4.53E-04 | 0.00E+00 |
| 238 | 240775.00 | 4081175.00 | Worker | 0.01 | 3.95E-04 | 0.00E+00 |
| 239 | 240525.00 | 4081200.00 | Worker | 0.01 | 8.40E-04 | 0.00E+00 |
| 240 | 240550.00 | 4081200.00 | Worker | 0.01 | 8.18E-04 | 0.00E+00 |

| Receptor ID | X-Coordinate (m) | Y-Coordinate (m) | Receptor Type | Cancer Risk (in a million) | Chronic Hazard Index | Acute Hazard Index |
|---|---|---|---|---|---|---|
| 241 | 240575.00 | 4081200.00 | Worker | 0.01 | 7.83E-04 | 0.00E+00 |
| 242 | 240600.00 | 4081200.00 | Worker | 0.01 | 7.35E-04 | 0.00E+00 |
| 243 | 240625.00 | 4081200.00 | Worker | 0.01 | 6.78E-04 | 0.00E+00 |
| 244 | 240650.00 | 4081200.00 | Worker | 0.01 | 6.14E-04 | 0.00E+00 |
| 245 | 240675.00 | 4081200.00 | Worker | 0.01 | 5.48E-04 | 0.00E+00 |
| 246 | 240700.00 | 4081200.00 | Worker | 0.01 | 4.84E-04 | 0.00E+00 |
| 247 | 240725.00 | 4081200.00 | Worker | 0.01 | 4.28E-04 | 0.00E+00 |
| 248 | 240750.00 | 4081200.00 | Worker | 0.00 | 3.79E-04 | 0.00E+00 |
| 249 | 240400.00 | 4080500.00 | Worker | 0.00 | 3.27E-04 | 0.00E+00 |
| 250 | 240450.00 | 4080500.00 | Worker | 0.00 | 3.58E-04 | 0.00E+00 |
| 251 | 240500.00 | 4080500.00 | Worker | 0.01 | 3.94E-04 | 0.00E+00 |
| 256 | 240750.00 | 4080500.00 | Worker | 0.01 | 6.90E-04 | 0.00E+00 |
| 257 | 240800.00 | 4080500.00 | Worker | 0.01 | 7.37E-04 | 0.00E+00 |
| 258 | 240300.00 | 4080550.00 | Worker | 0.00 | 3.40E-04 | 0.00E+00 |
| 259 | 240350.00 | 4080550.00 | Worker | 0.00 | 3.70E-04 | 0.00E+00 |
| 260 | 240400.00 | 4080550.00 | Worker | 0.01 | 4.06E-04 | 0.00E+00 |
| 261 | 240450.00 | 4080550.00 | Worker | 0.01 | 4.51E-04 | 0.00E+00 |
| 267 | 240750.00 | 4080550.00 | Worker | 0.01 | 9.40E-04 | 0.00E+00 |
| 268 | 240800.00 | 4080550.00 | Worker | 0.01 | 9.74E-04 | 0.00E+00 |
| 269 | 240850.00 | 4080550.00 | Worker | 0.01 | 9.58E-04 | 0.00E+00 |
| 270 | 240300.00 | 4080600.00 | Worker | 0.01 | 4.26E-04 | 0.00E+00 |
| 271 | 240350.00 | 4080600.00 | Worker | 0.01 | 4.70E-04 | 0.00E+00 |
| 272 | 240400.00 | 4080600.00 | Worker | 0.01 | 5.25E-04 | 0.00E+00 |
| 274 | 240500.00 | 4080600.00 | Worker | 0.01 | 6.88E-04 | 0.00E+00 |
| 279 | 240750.00 | 4080600.00 | Worker | 0.02 | 1.32E-03 | 0.00E+00 |
| 280 | 240800.00 | 4080600.00 | Worker | 0.02 | 1.30E-03 | 0.00E+00 |
| 281 | 240850.00 | 4080600.00 | Worker | 0.02 | 1.20E-03 | 0.00E+00 |
| 282 | 240900.00 | 4080600.00 | Worker | 0.01 | 1.06E-03 | 0.00E+00 |
| 283 | 240250.00 | 4080650.00 | Worker | 0.01 | 4.90E-04 | 0.00E+00 |
| 284 | 240300.00 | 4080650.00 | Worker | 0.01 | 5.44E-04 | 0.00E+00 |
| 285 | 240350.00 | 4080650.00 | Worker | 0.01 | 6.18E-04 | 0.00E+00 |
| 286 | 240400.00 | 4080650.00 | Worker | 0.01 | 7.14E-04 | 0.00E+00 |
| 287 | 240800.00 | 4080650.00 | Worker | 0.02 | 1.70E-03 | 0.00E+00 |
| 288 | 240850.00 | 4080650.00 | Worker | 0.02 | 1.43E-03 | 0.00E+00 |
| 289 | 240900.00 | 4080650.00 | Worker | 0.02 | 1.19E-03 | 0.00E+00 |
| 297 | 240300.00 | 4080750.00 | Residential | 0.35 | 7.97E-04 | 0.00E+00 |
| 298 | 240350.00 | 4080750.00 | Residential | 0.44 | 1.02E-03 | 0.00E+00 |
| 299 | 240850.00 | 4080750.00 | Worker | 0.02 | 1.66E-03 | 0.00E+00 |

| Receptor ID | X-Coordinate (m) | Y-Coordinate (m) | Receptor Type | Cancer Risk (in a million) | Chronic Hazard Index | Acute Hazard Index |
|---|---|---|---|---|---|---|
| 300 | 240900.00 | 4080750.00 | Worker | 0.02 | 1.26E-03 | 0.00E+00 |
| 301 | 240950.00 | 4080750.00 | Worker | 0.01 | 9.82E-04 | 0.00E+00 |
| 302 | 240250.00 | 4080800.00 | Residential | 0.31 | 7.24E-04 | 0.00E+00 |
| 303 | 240300.00 | 4080800.00 | Residential | 0.40 | 9.21E-04 | 0.00E+00 |
| 305 | 240850.00 | 4080800.00 | Worker | 0.02 | 1.63E-03 | 0.00E+00 |
| 306 | 240900.00 | 4080800.00 | Worker | 0.02 | 1.21E-03 | 0.00E+00 |
| 307 | 240950.00 | 4080800.00 | Worker | 0.01 | 9.18E-04 | 0.00E+00 |
| 308 | 240250.00 | 4080850.00 | Residential | 0.34 | 7.92E-04 | 0.00E+00 |
| 309 | 240300.00 | 4080850.00 | Residential | 0.45 | 1.03E-03 | 0.00E+00 |
| 311 | 240850.00 | 4080850.00 | Worker | 0.02 | 1.54E-03 | 0.00E+00 |
| 312 | 240900.00 | 4080850.00 | Worker | 0.01 | 1.11E-03 | 0.00E+00 |
| 313 | 240950.00 | 4080850.00 | Worker | 0.01 | 8.23E-04 | 0.00E+00 |
| 314 | 240250.00 | 4080900.00 | Residential | 0.36 | 8.38E-04 | 0.00E+00 |
| 315 | 240300.00 | 4080900.00 | Residential | 0.48 | 1.10E-03 | 0.00E+00 |
| 317 | 240850.00 | 4080900.00 | Worker | 0.02 | 1.37E-03 | 0.00E+00 |
| 318 | 240900.00 | 4080900.00 | Worker | 0.01 | 9.64E-04 | 0.00E+00 |
| 319 | 240950.00 | 4080900.00 | Worker | 0.01 | 7.04E-04 | 0.00E+00 |
| 321 | 240300.00 | 4080950.00 | Residential | 0.49 | 1.12E-03 | 0.00E+00 |
| 323 | 240850.00 | 4080950.00 | Worker | 0.01 | 1.15E-03 | 0.00E+00 |
| 324 | 240900.00 | 4080950.00 | Worker | 0.01 | 7.89E-04 | 0.00E+00 |
| 325 | 240950.00 | 4080950.00 | Worker | 0.01 | 5.73E-04 | 0.00E+00 |
| 326 | 240250.00 | 4081000.00 | Residential | 0.36 | 8.23E-04 | 0.00E+00 |
| 327 | 240300.00 | 4081000.00 | Residential | 0.47 | 1.08E-03 | 0.00E+00 |
| 329 | 240850.00 | 4081000.00 | Worker | 0.01 | 8.84E-04 | 0.00E+00 |
| 330 | 240900.00 | 4081000.00 | Worker | 0.01 | 6.07E-04 | 0.00E+00 |
| 331 | 240950.00 | 4081000.00 | Worker | 0.01 | 4.48E-04 | 0.00E+00 |
| 332 | 240250.00 | 4081050.00 | Residential | 0.33 | 7.64E-04 | 0.00E+00 |
| 333 | 240300.00 | 4081050.00 | Residential | 0.43 | 9.84E-04 | 0.00E+00 |
| 335 | 240850.00 | 4081050.00 | Worker | 0.01 | 6.24E-04 | 0.00E+00 |
| 336 | 240900.00 | 4081050.00 | Worker | 0.01 | 4.48E-04 | 0.00E+00 |
| 337 | 240950.00 | 4081050.00 | Worker | 0.00 | 3.44E-04 | 0.00E+00 |
| 338 | 240250.00 | 4081100.00 | Residential | 0.30 | 6.86E-04 | 0.00E+00 |
| 339 | 240300.00 | 4081100.00 | Residential | 0.37 | 8.59E-04 | 0.00E+00 |
| 340 | 240350.00 | 4081100.00 | Residential | 0.49 | 1.12E-03 | 0.00E+00 |
| 341 | 240850.00 | 4081100.00 | Worker | 0.01 | 4.33E-04 | 0.00E+00 |
| 342 | 240900.00 | 4081100.00 | Worker | 0.00 | 3.33E-04 | 0.00E+00 |
| 343 | 240950.00 | 4081100.00 | Worker | 0.00 | 2.67E-04 | 0.00E+00 |
| 344 | 240250.00 | 4081150.00 | Residential | 0.26 | 5.99E-04 | 0.00E+00 |

| Receptor ID | X-Coordinate (m) | Y-Coordinate (m) | Receptor Type | Cancer Risk (in a million) | Chronic Hazard Index | Acute Hazard Index |
|---|---|---|---|---|---|---|
| 345 | 240300.00 | 4081150.00 | Residential | 0.31 | 7.21E-04 | 0.00E+00 |
| 346 | 240350.00 | 4081150.00 | Residential | 0.38 | 8.82E-04 | 0.00E+00 |
| 347 | 240800.00 | 4081150.00 | Worker | 0.01 | 4.09E-04 | 0.00E+00 |
| 348 | 240850.00 | 4081150.00 | Worker | 0.00 | 3.18E-04 | 0.00E+00 |
| 349 | 240900.00 | 4081150.00 | Worker | 0.00 | 2.57E-04 | 0.00E+00 |
| 350 | 240950.00 | 4081150.00 | Worker | 0.00 | 2.14E-04 | 0.00E+00 |
| 351 | 240250.00 | 4081200.00 | Residential | 0.22 | 5.08E-04 | 0.00E+00 |
| 352 | 240300.00 | 4081200.00 | Residential | 0.25 | 5.83E-04 | 0.00E+00 |
| 353 | 240350.00 | 4081200.00 | Residential | 0.29 | 6.68E-04 | 0.00E+00 |
| 354 | 240400.00 | 4081200.00 | Residential | 0.33 | 7.54E-04 | 0.00E+00 |
| 355 | 240450.00 | 4081200.00 | Worker | 0.01 | 8.22E-04 | 0.00E+00 |
| 356 | 240500.00 | 4081200.00 | Worker | 0.01 | 8.48E-04 | 0.00E+00 |
| 357 | 240800.00 | 4081200.00 | Worker | 0.00 | 3.02E-04 | 0.00E+00 |
| 358 | 240850.00 | 4081200.00 | Worker | 0.00 | 2.46E-04 | 0.00E+00 |
| 359 | 240900.00 | 4081200.00 | Worker | 0.00 | 2.06E-04 | 0.00E+00 |
| 360 | 240300.00 | 4081250.00 | Residential | 0.20 | 4.62E-04 | 0.00E+00 |
| 361 | 240350.00 | 4081250.00 | Residential | 0.22 | 5.04E-04 | 0.00E+00 |
| 362 | 240400.00 | 4081250.00 | Residential | 0.23 | 5.38E-04 | 0.00E+00 |
| 363 | 240450.00 | 4081250.00 | Worker | 0.01 | 5.56E-04 | 0.00E+00 |
| 364 | 240500.00 | 4081250.00 | Worker | 0.01 | 5.50E-04 | 0.00E+00 |
| 365 | 240550.00 | 4081250.00 | Worker | 0.01 | 5.20E-04 | 0.00E+00 |
| 366 | 240600.00 | 4081250.00 | Worker | 0.01 | 4.69E-04 | 0.00E+00 |
| 367 | 240650.00 | 4081250.00 | Worker | 0.01 | 4.03E-04 | 0.00E+00 |
| 368 | 240700.00 | 4081250.00 | Worker | 0.00 | 3.37E-04 | 0.00E+00 |
| 369 | 240750.00 | 4081250.00 | Worker | 0.00 | 2.81E-04 | 0.00E+00 |
| 370 | 240800.00 | 4081250.00 | Worker | 0.00 | 2.34E-04 | 0.00E+00 |
| 371 | 240850.00 | 4081250.00 | Worker | 0.00 | 1.97E-04 | 0.00E+00 |
| 372 | 240900.00 | 4081250.00 | Worker | 0.00 | 1.69E-04 | 0.00E+00 |
| 373 | 240350.00 | 4081300.00 | Residential | 0.17 | 3.85E-04 | 0.00E+00 |
| 374 | 240400.00 | 4081300.00 | Residential | 0.17 | 3.98E-04 | 0.00E+00 |
| 375 | 240450.00 | 4081300.00 | Worker | 0.01 | 4.00E-04 | 0.00E+00 |
| 376 | 240500.00 | 4081300.00 | Worker | 0.00 | 3.88E-04 | 0.00E+00 |
| 377 | 240550.00 | 4081300.00 | Worker | 0.00 | 3.64E-04 | 0.00E+00 |
| 378 | 240600.00 | 4081300.00 | Worker | 0.00 | 3.32E-04 | 0.00E+00 |
| 379 | 240650.00 | 4081300.00 | Worker | 0.00 | 2.93E-04 | 0.00E+00 |
| 380 | 240700.00 | 4081300.00 | Worker | 0.00 | 2.54E-04 | 0.00E+00 |
| 381 | 240750.00 | 4081300.00 | Worker | 0.00 | 2.19E-04 | 0.00E+00 |
| 382 | 240800.00 | 4081300.00 | Worker | 0.00 | 1.89E-04 | 0.00E+00 |

| Receptor ID | X-Coordinate (m) | Y-Coordinate (m) | Receptor Type | Cancer Risk (in a million) | Chronic Hazard Index | Acute Hazard Index |
|---|---|---|---|---|---|---|
| 383 | 240850.00 | 4081300.00 | Worker | 0.00 | 1.63E-04 | 0.00E+00 |
| 384 | 240500.00 | 4081350.00 | Worker | 0.00 | 2.90E-04 | 0.00E+00 |
| 385 | 240550.00 | 4081350.00 | Worker | 0.00 | 2.73E-04 | 0.00E+00 |
| 386 | 240600.00 | 4081350.00 | Worker | 0.00 | 2.50E-04 | 0.00E+00 |
| 387 | 240650.00 | 4081350.00 | Worker | 0.00 | 2.25E-04 | 0.00E+00 |
| 388 | 240700.00 | 4081350.00 | Worker | 0.00 | 2.00E-04 | 0.00E+00 |
| 389 | 240750.00 | 4081350.00 | Worker | 0.00 | 1.78E-04 | 0.00E+00 |
| 390 | 240300.00 | 4080300.00 | Worker | 0.00 | 1.53E-04 | 0.00E+00 |
| 391 | 240400.00 | 4080300.00 | Worker | 0.00 | 1.73E-04 | 0.00E+00 |
| 392 | 240500.00 | 4080300.00 | Worker | 0.00 | 1.93E-04 | 0.00E+00 |
| 393 | 240600.00 | 4080300.00 | Worker | 0.00 | 2.15E-04 | 0.00E+00 |
| 395 | 240800.00 | 4080300.00 | Residential | 0.13 | 2.94E-04 | 0.00E+00 |
| 396 | 240900.00 | 4080300.00 | Residential | 0.15 | 3.37E-04 | 0.00E+00 |
| 397 | 240100.00 | 4080400.00 | Worker | 0.00 | 1.61E-04 | 0.00E+00 |
| 398 | 240200.00 | 4080400.00 | Worker | 0.00 | 1.77E-04 | 0.00E+00 |
| 399 | 240300.00 | 4080400.00 | Worker | 0.00 | 2.00E-04 | 0.00E+00 |
| 400 | 240400.00 | 4080400.00 | Worker | 0.00 | 2.31E-04 | 0.00E+00 |
| 401 | 240500.00 | 4080400.00 | Worker | 0.00 | 2.65E-04 | 0.00E+00 |
| 404 | 240800.00 | 4080400.00 | Worker | 0.01 | 4.46E-04 | 0.00E+00 |
| 405 | 240900.00 | 4080400.00 | Worker | 0.01 | 4.97E-04 | 0.00E+00 |
| 406 | 241000.00 | 4080400.00 | Worker | 0.01 | 4.97E-04 | 0.00E+00 |
| 409 | 240300.00 | 4080500.00 | Worker | 0.00 | 2.78E-04 | 0.00E+00 |
| 410 | 240900.00 | 4080500.00 | Worker | 0.01 | 7.46E-04 | 0.00E+00 |
| 411 | 241000.00 | 4080500.00 | Worker | 0.01 | 6.59E-04 | 0.00E+00 |
| 412 | 241100.00 | 4080500.00 | Worker | 0.01 | 5.39E-04 | 0.00E+00 |
| 413 | 240000.00 | 4080600.00 | Worker | 0.00 | 2.40E-04 | 0.00E+00 |
| 415 | 240200.00 | 4080600.00 | Worker | 0.00 | 3.63E-04 | 0.00E+00 |
| 416 | 241000.00 | 4080600.00 | Worker | 0.01 | 7.89E-04 | 0.00E+00 |
| 417 | 241100.00 | 4080600.00 | Worker | 0.01 | 5.76E-04 | 0.00E+00 |
| 418 | 240000.00 | 4080700.00 | Worker | 0.00 | 2.83E-04 | 0.00E+00 |
| 419 | 240100.00 | 4080700.00 | Worker | 0.00 | 3.63E-04 | 0.00E+00 |
| 420 | 240200.00 | 4080700.00 | Worker | 0.01 | 4.88E-04 | 0.00E+00 |
| 424 | 240000.00 | 4080800.00 | Worker | 0.00 | 3.10E-04 | 0.00E+00 |
| 425 | 240100.00 | 4080800.00 | Residential | 0.18 | 4.15E-04 | 0.00E+00 |
| 426 | 240200.00 | 4080800.00 | Residential | 0.26 | 5.88E-04 | 0.00E+00 |
| 427 | 241000.00 | 4080800.00 | Worker | 0.01 | 7.11E-04 | 0.00E+00 |
| 428 | 241100.00 | 4080800.00 | Residential | 0.20 | 4.50E-04 | 0.00E+00 |
| 429 | 241200.00 | 4080800.00 | Residential | 0.13 | 3.04E-04 | 0.00E+00 |

| Receptor ID | X-Coordinate (m) | Y-Coordinate (m) | Receptor Type | Cancer Risk (in a million) | Chronic Hazard Index | Acute Hazard Index |
|---|---|---|---|---|---|---|
| 430 | 240000.00 | 4080900.00 | Worker | 0.00 | 3.20E-04 | 0.00E+00 |
| 431 | 240100.00 | 4080900.00 | Residential | 0.19 | 4.43E-04 | 0.00E+00 |
| 432 | 240200.00 | 4080900.00 | Residential | 0.29 | 6.61E-04 | 0.00E+00 |
| 433 | 241000.00 | 4080900.00 | Worker | 0.01 | 5.32E-04 | 0.00E+00 |
| 434 | 241100.00 | 4080900.00 | Residential | 0.14 | 3.33E-04 | 0.00E+00 |
| 435 | 241200.00 | 4080900.00 | Residential | 0.10 | 2.28E-04 | 0.00E+00 |
| 438 | 240200.00 | 4081000.00 | Residential | 0.28 | 6.50E-04 | 0.00E+00 |
| 439 | 241000.00 | 4081000.00 | Worker | 0.00 | 3.48E-04 | 0.00E+00 |
| 440 | 241100.00 | 4081000.00 | Residential | 0.10 | 2.31E-04 | 0.00E+00 |
| 441 | 241200.00 | 4081000.00 | Residential | 0.07 | 1.67E-04 | 0.00E+00 |
| 442 | 240000.00 | 4081100.00 | Worker | 0.00 | 2.99E-04 | 0.00E+00 |
| 443 | 240100.00 | 4081100.00 | Residential | 0.17 | 4.01E-04 | 0.00E+00 |
| 444 | 240200.00 | 4081100.00 | Residential | 0.25 | 5.63E-04 | 0.00E+00 |
| 445 | 241000.00 | 4081100.00 | Worker | 0.00 | 2.21E-04 | 0.00E+00 |
| 446 | 241100.00 | 4081100.00 | Residential | 0.07 | 1.61E-04 | 0.00E+00 |
| 447 | 241200.00 | 4081100.00 | Residential | 0.05 | 1.24E-04 | 0.00E+00 |
| 448 | 240000.00 | 4081200.00 | Worker | 0.00 | 2.70E-04 | 0.00E+00 |
| 449 | 240100.00 | 4081200.00 | Residential | 0.15 | 3.42E-04 | 0.00E+00 |
| 450 | 240200.00 | 4081200.00 | Residential | 0.19 | 4.43E-04 | 0.00E+00 |
| 451 | 241000.00 | 4081200.00 | Residential | 0.07 | 1.53E-04 | 0.00E+00 |
| 452 | 241100.00 | 4081200.00 | Residential | 0.05 | 1.19E-04 | 0.00E+00 |
| 453 | 240000.00 | 4081300.00 | Worker | 0.00 | 2.29E-04 | 0.00E+00 |
| 454 | 240100.00 | 4081300.00 | Residential | 0.12 | 2.71E-04 | 0.00E+00 |
| 455 | 240200.00 | 4081300.00 | Residential | 0.14 | 3.18E-04 | 0.00E+00 |
| 456 | 240300.00 | 4081300.00 | Residential | 0.16 | 3.65E-04 | 0.00E+00 |
| 457 | 240900.00 | 4081300.00 | Worker | 0.00 | 1.42E-04 | 0.00E+00 |
| 458 | 241000.00 | 4081300.00 | Residential | 0.05 | 1.11E-04 | 0.00E+00 |
| 459 | 241100.00 | 4081300.00 | Residential | 0.04 | 9.09E-05 | 0.00E+00 |
| 460 | 240100.00 | 4081400.00 | Residential | 0.09 | 2.04E-04 | 0.00E+00 |
| 461 | 240200.00 | 4081400.00 | Residential | 0.10 | 2.22E-04 | 0.00E+00 |
| 462 | 240300.00 | 4081400.00 | Residential | 0.10 | 2.37E-04 | 0.00E+00 |
| 463 | 240400.00 | 4081400.00 | Residential | 0.11 | 2.42E-04 | 0.00E+00 |
| 464 | 240500.00 | 4081400.00 | Worker | 0.00 | 2.27E-04 | 0.00E+00 |
| 465 | 240600.00 | 4081400.00 | Worker | 0.00 | 1.96E-04 | 0.00E+00 |
| 466 | 240700.00 | 4081400.00 | Worker | 0.00 | 1.63E-04 | 0.00E+00 |
| 467 | 240800.00 | 4081400.00 | Worker | 0.00 | 1.33E-04 | 0.00E+00 |
| 468 | 240900.00 | 4081400.00 | Worker | 0.00 | 1.06E-04 | 0.00E+00 |
| 469 | 241000.00 | 4081400.00 | Residential | 0.04 | 8.51E-05 | 0.00E+00 |

| Receptor ID | X-Coordinate (m) | Y-Coordinate (m) | Receptor Type | Cancer Risk (in a million) | Chronic Hazard Index | Acute Hazard Index |
|---|---|---|---|---|---|---|
| 470 | 241100.00 | 4081400.00 | Residential | 0.03 | 7.10E-05 | 0.00E+00 |
| 471 | 240200.00 | 4081500.00 | Residential | 0.07 | 1.60E-04 | 0.00E+00 |
| 472 | 240300.00 | 4081500.00 | Residential | 0.07 | 1.65E-04 | 0.00E+00 |
| 473 | 240400.00 | 4081500.00 | Residential | 0.07 | 1.64E-04 | 0.00E+00 |
| 474 | 240500.00 | 4081500.00 | Worker | 0.00 | 1.51E-04 | 0.00E+00 |
| 475 | 240600.00 | 4081500.00 | Worker | 0.00 | 1.32E-04 | 0.00E+00 |
| 476 | 240700.00 | 4081500.00 | Worker | 0.00 | 1.15E-04 | 0.00E+00 |
| 477 | 240800.00 | 4081500.00 | Worker | 0.00 | 9.95E-05 | 0.00E+00 |
| 478 | 240900.00 | 4081500.00 | Worker | 0.00 | 8.34E-05 | 0.00E+00 |
| 479 | 241000.00 | 4081500.00 | Residential | 0.03 | 6.89E-05 | 0.00E+00 |
| 480 | 240500.00 | 4081600.00 | Worker | 0.00 | 1.09E-04 | 0.00E+00 |
| 481 | 240600.00 | 4081600.00 | Worker | 0.00 | 9.66E-05 | 0.00E+00 |
| 482 | 240700.00 | 4081600.00 | Worker | 0.00 | 8.64E-05 | 0.00E+00 |
| 483 | 240800.00 | 4081600.00 | Worker | 0.00 | 7.75E-05 | 0.00E+00 |
| 484 | 240500.00 | 4079750.00 | Worker | 0.00 | 6.31E-05 | 0.00E+00 |
| 485 | 240750.00 | 4079750.00 | Worker | 0.00 | 7.34E-05 | 0.00E+00 |
| 486 | 240000.00 | 4080000.00 | Residential | 0.03 | 6.55E-05 | 0.00E+00 |
| 487 | 240250.00 | 4080000.00 | Worker | 0.00 | 8.18E-05 | 0.00E+00 |
| 489 | 240750.00 | 4080000.00 | Worker | 0.00 | 1.17E-04 | 0.00E+00 |
| 490 | 241000.00 | 4080000.00 | Residential | 0.07 | 1.53E-04 | 0.00E+00 |
| 491 | 241250.00 | 4080000.00 | Residential | 0.08 | 1.79E-04 | 0.00E+00 |
| 492 | 239750.00 | 4080250.00 | Worker | 0.00 | 8.98E-05 | 0.00E+00 |
| 493 | 240000.00 | 4080250.00 | Worker | 0.00 | 1.05E-04 | 0.00E+00 |
| 494 | 240250.00 | 4080250.00 | Worker | 0.00 | 1.27E-04 | 0.00E+00 |
| 495 | 241000.00 | 4080250.00 | Residential | 0.13 | 3.09E-04 | 0.00E+00 |
| 496 | 241250.00 | 4080250.00 | Residential | 0.13 | 2.94E-04 | 0.00E+00 |
| 501 | 241250.00 | 4080500.00 | Worker | 0.00 | 3.77E-04 | 0.00E+00 |
| 506 | 241500.00 | 4080750.00 | Residential | 0.06 | 1.42E-04 | 0.00E+00 |
| 507 | 239500.00 | 4081000.00 | Worker | 0.00 | 1.09E-04 | 0.00E+00 |
| 508 | 239750.00 | 4081000.00 | Worker | 0.00 | 1.71E-04 | 0.00E+00 |
| 510 | 241500.00 | 4081000.00 | Residential | 0.04 | 8.22E-05 | 0.00E+00 |
| 511 | 239500.00 | 4081250.00 | Worker | 0.00 | 1.05E-04 | 0.00E+00 |
| 512 | 239750.00 | 4081250.00 | Worker | 0.00 | 1.56E-04 | 0.00E+00 |
| 513 | 241250.00 | 4081250.00 | Residential | 0.03 | 7.88E-05 | 0.00E+00 |
| 514 | 241500.00 | 4081250.00 | Residential | 0.02 | 5.37E-05 | 0.00E+00 |
| 515 | 239750.00 | 4081500.00 | Worker | 0.00 | 1.18E-04 | 0.00E+00 |
| 516 | 240000.00 | 4081500.00 | Worker | 0.00 | 1.44E-04 | 0.00E+00 |
| 517 | 241250.00 | 4081500.00 | Residential | 0.02 | 4.69E-05 | 0.00E+00 |

| Receptor ID | X-Coordinate (m) | Y-Coordinate (m) | Receptor Type | Cancer Risk (in a million) | Chronic Hazard Index | Acute Hazard Index |
|---|---|---|---|---|---|---|
| 518 | 241500.00 | 4081500.00 | Residential | 0.02 | 3.65E-05 | 0.00E+00 |
| 519 | 239750.00 | 4081750.00 | Worker | 0.00 | 6.76E-05 | 0.00E+00 |
| 520 | 240000.00 | 4081750.00 | Worker | 0.00 | 7.22E-05 | 0.00E+00 |
| 521 | 240250.00 | 4081750.00 | Worker | 0.00 | 7.62E-05 | 0.00E+00 |
| 522 | 240500.00 | 4081750.00 | Worker | 0.00 | 6.55E-05 | 0.00E+00 |
| 523 | 240750.00 | 4081750.00 | Worker | 0.00 | 5.81E-05 | 0.00E+00 |
| 524 | 241000.00 | 4081750.00 | Worker | 0.00 | 4.57E-05 | 0.00E+00 |
| 525 | 241250.00 | 4081750.00 | Worker | 0.00 | 3.29E-05 | 0.00E+00 |
| 526 | 240250.00 | 4082000.00 | Worker | 0.00 | 4.99E-05 | 0.00E+00 |
| 527 | 240500.00 | 4082000.00 | Worker | 0.00 | 4.19E-05 | 0.00E+00 |
| 528 | 240750.00 | 4082000.00 | Worker | 0.00 | 3.42E-05 | 0.00E+00 |
| 529 | 241000.00 | 4082000.00 | Worker | 0.00 | 3.13E-05 | 0.00E+00 |
| 531 | 240000.00 | 4079000.00 | Residential | 0.01 | 2.60E-05 | 0.00E+00 |
| 532 | 240500.00 | 4079000.00 | Residential | 0.01 | 2.72E-05 | 0.00E+00 |
| 534 | 241500.00 | 4079000.00 | Worker | 0.00 | 4.22E-05 | 0.00E+00 |
| 535 | 239000.00 | 4079500.00 | Worker | 0.00 | 2.66E-05 | 0.00E+00 |
| 536 | 239500.00 | 4079500.00 | Residential | 0.01 | 3.00E-05 | 0.00E+00 |
| 537 | 240000.00 | 4079500.00 | Residential | 0.02 | 3.74E-05 | 0.00E+00 |
| 538 | 240500.00 | 4079500.00 | Residential | 0.02 | 4.53E-05 | 0.00E+00 |
| 539 | 241000.00 | 4079500.00 | Worker | 0.00 | 6.06E-05 | 0.00E+00 |
| 540 | 241500.00 | 4079500.00 | Worker | 0.00 | 8.16E-05 | 0.00E+00 |
| 541 | 242000.00 | 4079500.00 | Residential | 0.04 | 8.13E-05 | 0.00E+00 |
| 542 | 239000.00 | 4080000.00 | Worker | 0.00 | 4.32E-05 | 0.00E+00 |
| 543 | 239500.00 | 4080000.00 | Residential | 0.02 | 5.33E-05 | 0.00E+00 |
| 544 | 241500.00 | 4080000.00 | Residential | 0.07 | 1.70E-04 | 0.00E+00 |
| 545 | 242000.00 | 4080000.00 | Residential | 0.05 | 1.08E-04 | 0.00E+00 |
| 546 | 242500.00 | 4080000.00 | Residential | 0.03 | 5.90E-05 | 0.00E+00 |
| 547 | 238500.00 | 4080500.00 | Worker | 0.00 | 3.80E-05 | 0.00E+00 |
| 548 | 239000.00 | 4080500.00 | Worker | 0.00 | 5.87E-05 | 0.00E+00 |
| 549 | 242000.00 | 4080500.00 | Residential | 0.03 | 7.85E-05 | 0.00E+00 |
| 550 | 242500.00 | 4080500.00 | Residential | 0.02 | 4.11E-05 | 0.00E+00 |
| 551 | 238500.00 | 4081000.00 | Worker | 0.00 | 3.72E-05 | 0.00E+00 |
| 552 | 239000.00 | 4081000.00 | Worker | 0.00 | 5.84E-05 | 0.00E+00 |
| 553 | 242000.00 | 4081000.00 | Residential | 0.02 | 3.88E-05 | 0.00E+00 |
| 554 | 242500.00 | 4081000.00 | Residential | 0.01 | 2.35E-05 | 0.00E+00 |
| 555 | 238500.00 | 4081500.00 | Worker | 0.00 | 3.39E-05 | 0.00E+00 |
| 556 | 239000.00 | 4081500.00 | Worker | 0.00 | 5.34E-05 | 0.00E+00 |
| 557 | 239500.00 | 4081500.00 | Worker | 0.00 | 9.03E-05 | 0.00E+00 |

| Receptor ID | X-Coordinate (m) | Y-Coordinate (m) | Receptor Type | Cancer Risk (in a million) | Chronic Hazard Index | Acute Hazard Index |
|---|---|---|---|---|---|---|
| 558 | 242000.00 | 4081500.00 | Residential | 0.01 | 2.43E-05 | 0.00E+00 |
| 559 | 242500.00 | 4081500.00 | Residential | 0.01 | 1.69E-05 | 0.00E+00 |
| 560 | 239000.00 | 4082000.00 | Worker | 0.00 | 3.90E-05 | 0.00E+00 |
| 561 | 239500.00 | 4082000.00 | Worker | 0.00 | 4.55E-05 | 0.00E+00 |
| 562 | 240000.00 | 4082000.00 | Worker | 0.00 | 4.98E-05 | 0.00E+00 |
| 563 | 241500.00 | 4082000.00 | Residential | 0.01 | 2.01E-05 | 0.00E+00 |
| 564 | 242000.00 | 4082000.00 | Residential | 0.01 | 1.44E-05 | 0.00E+00 |
| 565 | 239500.00 | 4082500.00 | Worker | 0.00 | 2.75E-05 | 0.00E+00 |
| 566 | 240000.00 | 4082500.00 | Worker | 0.00 | 2.85E-05 | 0.00E+00 |
| 567 | 240500.00 | 4082500.00 | Worker | 0.00 | 2.28E-05 | 0.00E+00 |
| 568 | 241000.00 | 4082500.00 | Worker | 0.00 | 1.90E-05 | 0.00E+00 |
| 569 | 241500.00 | 4082500.00 | Worker | 0.00 | 1.39E-05 | 0.00E+00 |
| 570 | 242000.00 | 4082500.00 | Worker | 0.00 | 1.01E-05 | 0.00E+00 |
| 571 | 240000.00 | 4083000.00 | Worker | 0.00 | 1.80E-05 | 0.00E+00 |
| 572 | 240500.00 | 4083000.00 | Worker | 0.00 | 1.45E-05 | 0.00E+00 |
| 573 | 241000.00 | 4083000.00 | Worker | 0.00 | 1.27E-05 | 0.00E+00 |
| 574 | 240982.00 | 4080428.00 | Sensitive | 0.24 | 5.48E-04 | 0.00E+00 |
| 575 | 241114.00 | 4080505.00 | Sensitive | 0.23 | 5.25E-04 | 0.00E+00 |
| 576 | 241812.00 | 4080393.00 | Sensitive | 0.05 | 1.20E-04 | 0.00E+00 |
| 577 | 239709.00 | 4079647.00 | Sensitive | 0.02 | 3.64E-05 | 0.00E+00 |
| 578 | 239709.00 | 4079647.00 | Sensitive | 0.02 | 3.64E-05 | 0.00E+00 |
| 579 | 242094.00 | 4081102.00 | Sensitive | 0.01 | 3.07E-05 | 0.00E+00 |
| 580 | 242489.00 | 4081376.00 | Sensitive | 0.01 | 1.80E-05 | 0.00E+00 |
| 581 | 241998.00 | 4079399.00 | Sensitive | 0.03 | 7.42E-05 | 0.00E+00 |
| 582 | 242523.00 | 4080146.00 | Sensitive | 0.02 | 5.26E-05 | 0.00E+00 |
| 583 | 240160.00 | 4078896.00 | Sensitive | 0.01 | 2.46E-05 | 0.00E+00 |
| 584 | 242576.00 | 4081764.00 | Sensitive | 0.01 | 1.39E-05 | 0.00E+00 |
| 585 | 242632.00 | 4080241.00 | Sensitive | 0.02 | 4.37E-05 | 0.00E+00 |

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# Appendix A

Urban Decay Impact Memorandum

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**MEMORANDUM**

**To:** Pari Holliday, Director, Real Estate Development, Costco Wholesale

**From:** Amy L. Herman, Principal

**Re:** Costco Fresno Relocation and Gas Station Urban Decay Impacts

**Date:** December 15, 2023

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## Introduction

ALH Urban & Regional Economics ("ALH Economics") understands that Costco Wholesale has proposed development of a relocated Costco store in northwest Fresno, CA at the northeast corner of North Riverside Drive and West Herndon Avenue (the "Project"). The proposed Costco store would relocate the existing store at 4500 Shaw Avenue, Fresno, CA, which has an existing gas station. While the Shaw Avenue Costco store would close, the existing gas station would continue to operate along with the proposed new gas station. Thus, Project development would result in the net addition of 32 fueling stations (i.e., 16 pumps) to Fresno's supply of gas stations, plus a drive-through car wash. There is yet another Costco gas station in Fresno located at 7100 N Abby Street.

A Draft Environmental Impact Report has been prepared for the Project. As part of the public review process of the DEIR, a limited number of comments were submitted expressing concern about the impact of the new gasoline pumps on the existing base of gas stations, as well as food store impacts. ALH Economics has prepared many studies examining the local urban decay impacts of Costco stores, Costco gas stations, or other large-scale general merchandise stores with food sales. These studies have been prepared for highly urbanized locations such as northwest Fresno. A typical definition of urban decay is as follows:

> *[U]rban decay is defined as, among other characteristics, visible symptoms of physical deterioration that invite vandalism, loitering, and graffiti that is caused by a downward spiral of business closures and multiple long term vacancies. This physical deterioration to properties or structures is so prevalent, substantial, and lasting for a significant period of time that it impairs the proper utilization of the properties and structures, or the health, safety, and welfare of the surrounding community. The manifestations of urban decay include such visible conditions as plywood-boarded doors and windows, parked trucks and long term unauthorized use of the properties and parking lots, extensive gang and other graffiti and*

> *offensive words painted on buildings, dumping of refuse on site, overturned dumpsters, broken parking barriers, broken glass littering the site, dead trees and shrubbery together with weeds, lack of building maintenance, abandonment of multiple buildings, homeless encampments, and unsightly and dilapidated fencing." These visible conditions are often characterized as "urban blight."*[1]

This memorandum provides some select insights into prospective urban decay impacts assessed in other California communities with Costco gas stations and their applicability to the current proposed Costco gas station and relocated store, as well as additional analysis pertinent to Fresno.

There are exhibits cited in this memorandum. These exhibits are included as Appendix A. Appendix B includes firm qualifications for ALH Economics, especially relative to urban decay analyses for retail projects, as well as a resume for the firm Principal, Amy L. Herman.

**Gas Station Impact Analysis**

Of most relevancy to Fresno, in 2020 ALH Economics assessed the prospective economic impacts, or urban decay impacts, of Costco Wholesale's proposed development of a 32-pump fuel facility next to an existing Costco Business Center. In the process of preparing this analysis, ALH Economics conducted case study analysis of three California cities where a Costco gas station was recently added to the community. These case studies were prepared for the cities of Santa Maria (Santa Barbara County), Eastvale (Riverside County), and Ukiah (Mendocino County). The gas stations in these communities were developed in 2017, 2018, and 2018, respectively. In seeking to analyze the impacts of these gas stations, ALH Economics examined a trend in quarterly gasoline sales and the number of outlets selling gasoline in each community, focusing on the trend both before and after introduction of the new Costco gas station and after. The gasoline sales changes in each community were compared to gasoline sector sales throughout the State of California. These data are presented in Exhibit 1.

The findings of this analysis indicated that each community's initial response was a short-term downward trend in gasoline sales, then a re-stabilization within six months after a period of market adjustment, marked by no decline in the number of gas stations, with some cities even increasing the number of gas stations or planning expansions. Subsequent to the preparation of this analysis, the COVID-19 pandemic significantly impacted the gasoline sector in all of these case study cities, as well as throughout the State of California, as automobile-based work commutes and other automobile trips diminished greatly. Examination of taxable retail sales data published by the State of California Department of Tax and Fee Administration indicates that gasoline sales in California declined by almost 30% from 2019 to 2020, with very similar

[1] See *Chico Advocates for a Responsible Economy v. City of Chico* (*Chico Advocates*) (2019), 40 Cal.App.5th 839, 843, and *Joshua Tree Downtown Bus. All. v. County of San Bernardino* (*Joshua Tree*) (2016) 1 Cal. App. 5th 677, 685.

percentage declines in the case study cities. However, as the economy recovered, two of the case study cities experienced year to year percent sales increases greater than the State of California. And by 2022, all three cities achieved annual gasoline sales significantly greater than pre-pandemic (see Exhibit 1). Moreover, by 2022, all three cities had more gas stations than they did prior to the opening of the Costco gas station under study, with the percentage increase in the number of gas stations greatly exceeding the percentage population growth over the same time period.

The annual trend data applicable to these case study cities and the State of California is also presented in Exhibit 1. For each case study city, this exhibit includes the annual number of permitted outlets selling gasoline, annual taxable gasoline sales, and the year-to-year percent change in sales, benchmarked to the annual percent change throughout the State. Exhibit 2 presents population trend data for each case study city over the 2016 to 2022 period, including a gas sales per capita metric. Thus, some of the poignant findings from the data in Exhibits 1 and 2 include the following:

- In Santa Maria, where the Costco gas station opened in 2017, the number of gasoline outlets grew 29% from 2016 to 2022, compared to a scant 3% population growth. Over the same period, gasoline sales increased by 83%.

- In Eastvale, where the Costco gas station opened in 2018, the number of gasoline outlets grew 33% from 2017 to 2022, while population increased by a much lower 10%. Over the same period, gasoline sales increased by 71%; and

- In Ukiah, where the Costco gas station also opened in 2018, the number of gasoline outlets grew 20% from 2017 to 2022, with gasoline sales increasing by a comparable 18%, while the already low population base increased by a nominal 1%.

While some of these sales changes can be tied to the volatility in gasoline pricing, they nevertheless indicate an increasing trend in the number of gasoline stations and gross amount of gasolines sales after the opening of a Costco gas station. Thus, these findings strongly suggest the base of gas stations existing prior to the development of the Costco gas stations are not negatively impacted by the Costco gas station, and thus do not result in closed gas stations potentially leading to urban decay.

This bodes well for the base of existing gas stations in northwest Fresno, as the case study data indicate that both in the near-term of six months and more long-term, gas sales in communities with new Costco gas stations rebound and grow, indicating a lack of economic impact associated with the Costco gas station. The likelihood this will also be the case in Fresno is further suggested by the per capita gasoline sales data presented in Exhibit 2, which also includes the City of Fresno. As these data indicate, per capita gasoline sales in the case study cities in 2022 ranged from a low of $989 in Eastvale to a high of $2,830 in Ukiah. The per capita figure of $2,183 in Santa Maria was also at the high end. These figures compare to $1,824 throughout the State of California. The comparable figure for Fresno in 2022 was $1,445. This suggests that Fresno's

gasoline sales are underperforming relative to the State as a whole, as well as other cities with Costco gas stations. Accordingly, these trends point to the potential for Fresno to be able to absorb additional gasoline sales, raising the per capita average. In addition, the percent increase in gas sales per capita metric shown in Exhibit 2 indicates that this measure has not increased in Fresno as much as most of the other cited locations, including the State of California. Specifically, from 2016 to 2022, gas sales per capita increased by 41% in Fresno, which is significantly lower than the 65% increase in the State of California and the 69% and 78% increases in Eastvale and Santa Maria, respectively. Only Ukiah had a lower percentage increase over the same time period, of 34%.

There are at least two other factors that suggest the impact on existing Fresno gas stations will be minimal, especially over time. First, only Costco members can purchase gas at Costco gas stations. In contrast, any consumer can purchase gas at the existing base of gasoline stations, many of which likely offer a wider range of fuel products, are open longer hours and for more days of the week, sell on-site convenience store products, have customer restrooms (which are not a Costco gas station feature), and in some cases provide expanded automobile care services. Thus, all or most of the existing gas stations have more customer service offerings than Costco and they all have access to a broader customer base because they do not have a customer membership requirement. Lastly, because the proposed new Costco gas station will be about 3.4 miles from the existing Costco gas station, as well as about 7.0 miles from the other Costco gas station in Fresno, it is likely to draw some demand away from these stations. This is attributable to proximity, since gas is often a purchase of convenience, based on need and easy access, including pass-by demand en route to home, work, or other destinations. Costco members who live or work closer to the proposed gas station, may very well shift their demand away from the existing Costco gas stations in favor of the new gas station for this reason.

In summary, many factors suggest that the proposed Costco gas station at the northeast corner of North Riverside Drive and West Herndon Avenue will have minimal impact on existing Fresno gas stations, especially beginning six months or so after the new gas station opens. As a result, the opening of the new gas station is not likely to result in strong sales declines at existing gas stations, and none of the existing gas stations are likely to close. Consequently, urban decay, which can result from conditions associated with closed retail outlets, is not anticipated to result from development of the new Costco gas station.

**Food Store Impacts**

ALH Economics has prepared numerous urban decay studies for food stores or general merchandise stores with a significant food sales component. This includes EIR's prepared for developments featuring stores such as Safeway, Whole Foods, Grocery Outlet Bargain Market, Walmart, Costco, and Target. Many of these projects are identified in Appendix B: Firm Qualifications and Principal Resume. As part of the process of preparing these studies, ALH Economics inventoried existing competitive food stores and estimated the sales impact of the store under study on these competitive stores. This analysis takes into consideration the market niches

of each competitive store, the likely market area from which study stores will attract shoppers, and demographic growth trends.

Generally, in communities with a strong retail sector and demographic growth, the findings pertaining to the food sales components of the proposed new stores typically found there to be only a negligible impact on existing food store sales, not sufficient to put stores at risk of closure, and recouped over time depending upon the community's anticipated population and household growth. ALH Economics believes these generalized findings will equally pertain to the relocated Costco Wholesale store and its food sales component. This belief is supported by a consistent upward trend in the City of Fresno's taxable food sales, dating back to at least 2016. As shown in Table 1, the City of Fresno's taxable food sales annually increased by a low of 3.1% to a high of 12.6% over the 2016-2022 time period. This indicates that food sales are strong in Fresno, with consistently increasing demand.

**Table 1. Annual Taxable Foods Sales**
**City of Fresno, 2016-2022**

| Year | Taxable Food Sales | Annual Increase Amount | Annual Increase Percent |
|---|---|---|---|
| 2016 | $375,394,312 | - | - |
| 2017 | $400,190,134 | $24,795,822 | 6.6% |
| 2018 | $422,475,761 | $22,285,627 | 5.6% |
| 2019 | $439,513,698 | $17,037,937 | 4.0% |
| 2020 | $453,009,159 | $13,495,461 | 3.1% |
| 2021 | $509,955,408 | $56,946,249 | 12.6% |
| 2022 | $535,468,780 | $25,513,372 | 5.0% |

Sources: State of California, Department of Tax and Fee Administration, Annual Taxable Sales Reports; and ALH Urban & Regional Economics.

This future growth in food store sales is likely to continue into the future, consistent with future population and household growth. While it is not specific to the City of Fresno, the demographic projections in Table 2 indicate that Fresno County population is projected to grow consistently on an annual basis. Projections prepared by the State of California Department of Finance (DOF) suggest annual growth of about 0.4% to 0.5% per year up to the year 2030 (further growth is projected by DOF beyond this time period).

Other data prepared by DOF suggest that the City of Fresno's population consistently comprises 53% to 54% of the County's population.[2] Thus, a significant portion of the countywide population growth will likely occur in Fresno assuming this trend continues into the future. This growth will continue to fuel demand for food store sales, thus offsetting any prospective negative food store sales impacts associated with the Costco relocation.

[2] This finding is based on population data prepared by DOF, spanning the 2010's and beyond.

Table 2. Fresno County Population Projections
2020-2030

| Year | Projected Population | Annual Increase Amount | Annual Increase Percent |
|---|---|---|---|
| 2020 | 1,007,344 | - | |
| 2021 | 1,010,453 | 3,109 | 0.3% |
| 2022 | 1,012,350 | 1,897 | 0.2% |
| 2023 | 1,015,793 | 3,443 | 0.3% |
| 2024 | 1,019,575 | 3,782 | 0.4% |
| 2025 | 1,023,586 | 4,011 | 0.4% |
| 2026 | 1,027,816 | 4,230 | 0.4% |
| 2027 | 1,031,968 | 4,152 | 0.4% |
| 2028 | 1,036,474 | 4,506 | 0.4% |
| 2029 | 1,042,150 | 5,676 | 0.5% |
| 2030 | 1,047,382 | 5,232 | 0.5% |

Sources: State of California, Department of Finance, Report P-2C: Population Projections by Sex and 5-year Age Group, 2020-2060; and ALH Urban & Regional Economics.

The most substantial factor contributing to minimal food store sales impacts will be the fact that the Costco store is being relocated, rather than the Project comprising a net new Costco store in the Fresno market. In all likelihood existing Costco shoppers will transfer their purchases from the existing store to the new store, such that diversions from existing area food stores will be at a minimum. Thus, sales impacts are not likely to be high enough to contribute to the closure of existing food stores, and urban decay is not likely to result.

**Summary Conclusion**

In summary, past findings in other communities and existing and projected data for the City of Fresno all suggest that the gas station and food store retail sectors in Fresno are not likely to be significantly impacted by the relocation of the Shaw Avenue Costco store and opening of a net new gas station in association with this relocated store. Accordingly, the Project is not anticipated to cause or contribute to conditions of urban decay in the City of Fresno.

*This memorandum is subject to the following Assumptions and General Limiting Conditions.*

Projects\2023\Costco Fresno\2310\2310.m01

# ASSUMPTIONS AND GENERAL LIMITING CONDITIONS

ALH Urban & Regional Economics has made extensive efforts to confirm the accuracy and timeliness of the information contained in this study. Such information was compiled from a variety of sources, including interviews with government officials, review of City and County documents, and other third parties deemed to be reliable. Although ALH Urban & Regional Economics believes all information in this study is correct, it does not warrant the accuracy of such information and assumes no responsibility for inaccuracies in the information by third parties. We have no responsibility to update this report for events and circumstances occurring after the date of this report. Further, no guarantee is made as to the possible effect on development of present or future federal, state or local legislation, including any regarding environmental or ecological matters.

The accompanying projections and analyses are based on estimates and assumptions developed in connection with the study. In turn, these assumptions, and their relation to the projections, were developed using currently available economic data and other relevant information. It is the nature of forecasting, however, that some assumptions may not materialize, and unanticipated events and circumstances may occur. Therefore, actual results achieved during the projection period will likely vary from the projections, and some of the variations may be material to the conclusions of the analysis.

Contractual obligations do not include access to or ownership transfer of any electronic data processing files, programs or models completed directly for or as by-products of this research effort, unless explicitly so agreed as part of the contract.

# APPENDIX A: EXHIBITS

**Exhibit 1**
**Gas Station Establishments and Taxable Sales, Before and After Opening of Costco Gas Stations (1)**
**Cities of Santa Maria, Eastvale, and Ukiah, Compared to State of California Change in Gas Station Sales (2)**
**2016 through Second Quarter 2019; and 2016 through 2022 Annually**

| | | | City of Santa Maria & CA | | | | City of Eastvale & CA | | | | City of Ukiah & CA | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | | | Date Costco Gas Station Opened: 9/13/2017 | | | | Date Costco Gas Station Opened: 6/5/2018 | | | | Date Costco Gas Station Opened: 7/18/2018 | | | |
| Year | Qrtr | CA State Sales in $bil | City Permits | City Sales (3) | City Sales Change | State Sales Change | City Permits | City Sales (3) | City Sales Change | State Sales Change | City Permits | City Sales (3) | City Sales Change | State Sales Change |
| 2016 | Q1 | $9.8 | 22 | $28,753,344 | - | - | 5 | $6,931,734 | - | - | 13 | $8,025,415 | - | - |
| 2016 | Q2 | $11.2 | 21 | $34,229,152 | 19% | 14% | 5 | $9,327,188 | 35% | 14% | 13 | $8,602,327 | 7% | 14% |
| 2016 | Q3 | $11.4 | 22 | $35,705,963 | 4% | 1% | 5 | $9,326,994 | 0% | 1% | 13 | $8,682,997 | 1% | 1% |
| 2016 | Q4 | $10.9 | 21 | $32,275,056 | -10% | -4% | 5 | $8,937,192 | -4% | -4% | 13 | $8,085,814 | -7% | -4% |
| 2017 | Q1 | $10.8 | 22 | $31,899,587 | -1% | 0% | 6 | $7,975,912 | -11% | 0% | 13 | $9,151,355 | 13% | 0% |
| 2017 | Q2 | $12.1 | 21 | $37,752,870 | 18% | 12% | 6 | $9,860,201 | 24% | 12% | 12 | $9,707,151 | 6% | 12% |
| 2017 | Q3 | $12.4 | **21** | **$39,433,674** | **4%** | **2%** | 6 | $10,220,107 | 4% | 2% | 11 | $9,798,948 | 1% | 2% |
| 2017 | Q4 | $12.1 | 22 | $34,962,172 | -11% | -2% | 6 | $10,283,603 | 1% | -2% | 10 | $9,745,262 | -1% | -2% |
| 2018 | Q1 | $12.4 | 22 | $32,843,761 | -6% | 2% | 6 | $11,950,950 | 16% | 2% | 10 | $9,986,917 | 2% | 2% |
| 2018 | Q2 | $14.1 | 23 | $41,298,199 | 26% | 14% | **5** | **$13,540,070** | **13%** | **14%** | 10 | $10,469,821 | 5% | 14% |
| 2018 | Q3 | $14.2 | 23 | $35,995,544 | -13% | 0% | 5 | $10,030,173 | -26% | 0% | **10** | **$9,908,776** | **-5%** | **0%** |
| 2018 | Q4 | $13.6 | 23 | $34,041,181 | -5% | -4% | 4 | $8,774,641 | -13% | -4% | 10 | $8,847,462 | -11% | -4% |
| 2019 | Q1 | $11.7 | 23 | $33,074,430 | -3% | -14% | 5 | $7,396,867 | -16% | -14% | 10 | $6,071,999 | -31% | -14% |
| 2019 | Q2 | $14.6 | 23 | $43,416,205 | 31% | 25% | 5 | $9,944,539 | 34% | 25% | 11 | $10,116,866 | 67% | 25% |

| Year | CA State Sales in $bil | City Permits | City Sales (3) | City Sales Change | State Sales Change | City Permits | City Sales (3) | City Sales Change | State Sales Change | City Permits | City Sales (3) | City Sales Change | State Sales Change |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| 2016 | $43.3 | 21 | $130,963,515 | - | | 5 | $34,523,108 | - | | 13 | $33,396,553 | - | |
| 2017 | $47.4 | 22 | $144,048,303 | 10% | 10% | 6 | $38,339,823 | 11% | 10% | 10 | $38,402,716 | 15% | 10% |
| 2018 | $54.3 | 23 | $150,025,076 | 4% | 14% | 4 | $47,072,735 | 23% | 14% | 10 | $39,212,976 | 2% | 14% |
| 2019 | $54.1 | 23 | $160,472,181 | 7% | 0% | 5 | $35,085,275 | -25% | 0% | 13 | $34,569,499 | -12% | 0% |
| 2020 | $38.3 | 22 | $113,308,111 | -29% | -29% | 5 | $23,392,845 | -33% | -29% | 12 | $33,245,337 | -4% | -29% |
| 2021 | $56.2 | 22 | $178,407,693 | 57% | 47% | 5 | $46,741,916 | 100% | 47% | 11 | $39,524,382 | 19% | 47% |
| 2022 | $71.3 | 27 | $239,294,794 | 34% | 27% | 8 | $65,684,000 | 41% | 27% | 12 | $45,424,981 | 15% | 27% |

| 2016 - 2022 Percent Increase | | 2017 - 2022 Percent Increase | | 2017 - 2022 Percent Increase | |
|---|---|---|---|---|---|
| 29% | 83% | 33% | 71% | 20% | 18% |

Sources: State of California Department of Tax and Fee Administration, First Quarter 2016 through Third Quarter 2019, Taxable Quarterly Reports; Costco Wholesale Corporation; and ALH Urban & Regional Economics.

(1) Each Costco gas station opening date is identified in the column headings by City. For each city, the figures corresponding to the quarter during which the Costco gas station opened are shaded in light gray.
(2) The trend analysis for each city includes the State of Calfiornia trend in gas station sales on a quarter over quarter basis.
(3) All dollars are in current year dollars, and have not been adjusted for inflation.

**Exhibit 2**
**Population and Gas Sales Per Capita (1)**
**Cities of Santa Maria, Eastvale, Ukiah, Fresno and the State of California (2)**
**2016 through 2022 (2)**

| | City of Santa Maria | | City of Eastvale | | City of Ukiah | | City of Fresno | | State of California | |
|---|---|---|---|---|---|---|---|---|---|---|
| Year | Population | Gas Sales Per Capita | Population | Gas Sales Per Capita | Population | Gas Sales Per Capita | Population | Gas Sales Per Capita | Population | Gas Sales Per Capita |
| 2016 | 106,744 | $1,227 | 62,147 | $556 | 15,796 | $2,114 | 529,552 | $1,027 | 39,179,627 | $1,104 |
| 2017 | 107,978 | $1,334 | 63,720 | $602 | 15,889 | $2,417 | 533,670 | $1,106 | 39,500,973 | $1,201 |
| 2018 | 108,470 | $1,383 | 64,855 | $726 | 16,226 | $2,417 | 538,330 | $1,142 | 39,809,693 | $1,364 |
| 2019 | 107,356 | $1,495 | 66,078 | $531 | 16,296 | $2,121 | 536,683 | $1,095 | 39,927,315 | $1,356 |
| 2020 | 109,660 | $1,033 | 69,742 | $335 | 16,604 | $2,002 | 542,081 | $858 | 39,538,223 | $970 |
| 2021 | 110,672 | $1,612 | 70,457 | $663 | 16,220 | $2,437 | 541,652 | $1,223 | 39,286,510 | $1,431 |
| 2022 | 109,617 | $2,183 | 69,978 | $939 | 16,052 | $2,830 | 542,829 | $1,445 | 39,078,674 | $1,824 |
| | 2016 - 2022 Percent Increase | | 2016 - 2022 Percent Increase | | 2016 - 2022 Percent Increase | | 2016 - 2022 Percent Increase | | 2016 - 2022 Percent Increase | |
| | 3% | 78% | 13% | 69% | 2% | 34% | 3% | 41% | 0% | 65% |

Sources: Exhibit 1; State of California Department of Finance, Table 2: E-5 City/County Population and Housing Estimates, 1/1/2018, 1/1/2019; and 1/1/2023; and ALH Urban & Regional Economics.

(1) All dollars are in current year dollars, and have not been adjusted for inflation.

(2) The shaded lines indicate the year corresponsing with a Costco gas station opening date. Some locations are presented for general reference.

# APPENDIX B
# FIRM QUALIFICATIONS AND PRINCIPAL RESUME

## FIRM INTRODUCTION

ALH Urban & Regional Economics (ALH Economics) is a sole proprietorship devoted to providing urban and regional economic consulting services to clients throughout California. The company was formed in June 2011. Until that time, Amy L. Herman, Principal and Owner (100%) of ALH Economics, was a Senior Managing Director with CBRE Consulting in San Francisco, a division of the real estate services firm CB Richard Ellis. CBRE Consulting was the successor firm to Sedway Group, in which Ms. Herman was a part owner, which was a well-established urban economic and real estate consulting firm acquired by CB Richard Ellis in late 1999.

ALH Economics provides a range of economic consulting services, including:

- fiscal and economic impact analysis
- CEQA-prescribed urban decay analysis
- economic studies in support of general plans, specific plans, and other long-range planning efforts
- market feasibility analysis for commercial, housing, and industrial land uses
- economic development and policy analysis
- other specialized economic analyses tailored to client needs

Since forming ALH Economics, Ms. Herman's client roster includes California cities, counties, and other public agencies; educational institutions; architectural, environmental, and other real estate-related consulting firms; commercial and residential developers; non-profits; and law firms. A select list of ALH Economics clients includes the following:

- the cities of Concord, Pleasanton, Tracy, Dublin, Inglewood, Petaluma, and Los Banos, the Office of Community Investment and Infrastructure as Successor Agency to the Redevelopment Agency of the City and County of San Francisco, Alameda County Community Development Agency, the Alameda County Fair, Bay Area Rapid Transit District, East Bay Community Energy, and The Presidio Trust;
- the University of California at Berkeley, Stanford Real Estate, The Primary School, The Claremont Colleges Services, and the University of California at Riverside;
- Environmental Science Associates (ESA), Dudek, Group 4 Architecture, Research + Planning, Inc., Paul Halajian Architects, LSA Associates, Raney Planning and Management, Inc., First Carbon Solutions - Michael Brandman Associates, and Infrastructure Management Group, Inc.;
- Catellus Development Corporation, Maximus Real Estate Partners, New West Communities, Build, Inc., Arcadia Development Co., KB Home, Howard Hughes Corporation dba Victoria Ward LLC, Blu Homes, Inc., Kimco Realty, Align Real Estate LLC, Centercal, Carvana Co., and Trammell Crow Residential;
- Costco Wholesale Corporation, One Medical, Golden State Lumber, Public Storage, Home Depot, and Lifetime Fitness;
- Gresham Savage Nolan & Tilden, PC, Remy Moose Manley, Pelosi Law Group, Sedgwick LLP, Coblentz Patch Duffy & Bass LLP

Throughout her more than 30-year career, Ms. Herman has managed real estate consulting assignments for hundreds of additional clients, including many California cities, corporations, residential, commercial, and industrial real estate developers, and Fortune 100 firms.

## RELEVANT EXPERIENCE: RETAIL URBAN DECAY STUDIES

### Description of Services

The Principal of ALH Economics, Amy L. Herman, has performed economic impact and urban decay studies for a number of retail development projects in California. These studies have generally been the direct outcome of the 2004 court ruling *Bakersfield Citizens for Local Control ("BCLC") v. City of Bakersfield* (December 2004) 124 Cal.App.4th 1184, requiring environmental impacts analyses to take into consideration the potential for a retail project as well as other cumulative retail projects to contribute to urban decay in the market area served by the project. Prior to the advent of the Bakersfield court decision, Ms. Herman managed these studies for project developers or retailers, typically at the request of the host city, or sometimes for the city itself. Following the Bakersfield decision, the studies have most commonly been directly commissioned by the host cities or environmental planning firms conducting Environmental Impact Reports (EIRs) for the projects. Studies are often conducted as part of the EIR process, but also in response to organized challenges to a city's project approval or to Court decisions ruling that additional analysis is required.

The types of high volume retail projects for which these studies have been conducted include single store developments, typically comprising a Walmart Store, The Home Depot, Target store, Costco, and other club-like retail stores. The studies have also been conducted for large retail shopping centers, typically anchored by one or more of the preceding stores, but also including as much as 300,000 to 400,000 square feet of additional retail space with smaller anchor stores and in-line tenants.

The scope of services for these studies includes numerous tasks. The basic tasks common to most studies include the following:

- defining the project and estimating sales for the first full year of operations;
- identifying the market area;
- identifying and touring existing competitive market area retailers;
- evaluating existing retail market conditions at competitive shopping centers and along major commercial corridors in the market area;
- conducting retail demand, sales attraction, and spending leakage analyses for the market area and other relevant areas;
- forecasting future retail demand in the market area;
- researching the retail market's history in backfilling vacated retail spaces;
- assessing the extent to which project sales will occur to the detriment of existing retailers (i.e., diverted sales);
- determining the likelihood existing competitive and nearby stores will close due to sales diversions attributable to the project;
- researching planned retail projects and assessing cumulative impacts; and

- identifying the likelihood the project's economic impacts and cumulative project impacts will trigger or cause urban decay.

Many studies include yet additional tasks, such as assessing the project's impact on downtown retailers; determining the extent to which development of the project corresponds with city public policy, redevelopment, and economic development goals; projecting the fiscal benefits relative to the host city's General Plan; forecasting job impacts; analyzing wages relative to the existing retail base; and assessing potential impacts on local social service providers.

**Representative Projects**

Many high volume retail projects for which Ms. Herman has prepared economic impact and urban decay studies are listed below. These include projects that are operational, projects under construction, projects approved and beyond legal challenges but not yet under construction, and project currently engaged in the public process. By category, projects are listed alphabetically by the city in which they are located.

***Projects Operational***

- Alameda, Alameda Landing, totaling 285,000 square feet anchored by a Target (opened October 2013), rest of center opening starting in 2015
- American Canyon, Napa Junction Phases I and II, 239,958 square feet, anchored by a Walmart Superstore, prepared in response to a Court decision; project opened September 2007
- Bakersfield, Gosford Village Shopping Center, totaling 700,000 square feet, anchored by a Walmart Superstore, Sam's Club, and Kohl's; Walmart store opened March 18, 2010, Sam's Club and Kohl's built earlier
- Bakersfield, Panama Lane, Shopping Center, totaling 434,073 square feet, anchored by a Walmart Superstore and Lowe's Home Improvement Warehouse; Walmart store opened October 2009, Lowe's store built earlier
- Bakersfield, Silver Creek Plaza, anchored by a WinCo Foods, totaling 137,609 square feet, opened February 28, 2014
- Cameron Park (El Dorado County), Grocery Outlet Bargain Market, 16,061 square feet, opened November 2023
- Carlsbad, La Costa Town Square lifestyle center, totaling 377,899 square feet, anchored by Steinmart, Vons, Petco, and 24 Hour Fitness, opened Fall 2014
- Citrus Heights, Stock Ranch Walmart Discount Store with expanded grocery section, 154,918 square feet; store opened January 2007
- Clovis, Clovis-Herndon Shopping Center, totaling 525,410 square feet, anchored by a Walmart Superstore, opened March 2013
- Concord, Lowe's Commercial Shopping Center, totaling 334,112 square feet, anchored by a Lowe's Home Improvement Warehouse and a national general merchandise store; EIR Certified December 2008 with no subsequent legal challenge; store opened January 2010
- Concord, Veranda Shopping Center, a 375,000-square foot center anchored by a Whole Foods 365 Market, Movie Theater, and upscale apparel retail, opened October 2017, with 365 Market opening December 2017

- Cool, Dollar General, proposed store on a 1.69-acre site totaling 9,100 square feet, opened 2023
- Dublin, Persimmon Place, 167,200 square feet, anchored by Whole Foods, opened 2015
- Folsom, Lifetime Fitness Center, a 116,363-square-foot fitness center including an outdoor leisure and lap pool, two water slides, whirlpool, outdoor bistro, eight tennis courts, outdoor Child Activity Area, and outdoor seating, opened April 2017
- Fresno, Park Crossing (formerly Fresno 40), totaling 209,650 square feet, July 2015
- Gilroy, 220,000-square-foot Walmart Superstore, replaced an existing Discount Store; store opened October 2005, with Discount Store property under new ownership planned for retail redevelopment of a 1.5-million-square-foot mall
- Gilroy, Lowe's Home Improvement Warehouse, 166,000 square feet; store opened May 2003
- Hayward, Costco Gas Station, addition to existing Costco Business Center, opened mid-2023
- Hesperia, Main Street Marketplace, totaling 465,000 square feet, anchored by a Walmart Superstore and a Home Depot, Walmart under construction, opened September 2012
- Madera, Commons at Madera, totaling 306,500 square feet, anchored by a Lowe's Home Improvement Warehouse; project opened July 2008
- Oakland, Safeway expansion, College & Claremont Avenues, 51,510 square feet total, comprising a 36,787 square-foot expansion, opened January 2015
- Oakland, Rockridge Safeway expansion and shopping center redevelopment (The Ridge), including total net new development of 137,072 square feet, opened September 2016
- Oroville, Walmart Superstore, 213,400 square feet, replacing existing Walmart Discount Store, opened April 2017
- Rancho Cordova, Capital Village, totaling 273,811 square feet, anchored by a Lowe's Home Improvement Warehouse; phased project opening, January 2008 – July 2008
- Sacramento, Delta Shores, 1.3- to 1.5-million square feet, anchored by a lifestyle center; phased project opening beginning September 2017
- Sacramento, Downtown Commons, mixed-use entertainment complex with 682,500 square feet of retail space adjoining new Golden 1 Center for the Sacramento Kings; initial tenant 2016, additional tenants beginning November 2017
- Sacramento, Land Park Commercial Center, proposed commercial center with a 55,000-square-foot relocated and expanded full service Raley's grocery store and pharmacy and seven freestanding retail buildings comprising 53,980 square feet, Raley's opened April 2020
- San Francisco, Chase Center, prepared response to comments regarding impacts on Oakland Arena, opened September 2019
- San Jose (East San Jose), Home Depot Store, 149,468 square feet; store opened October 2007
- San Jose, Lowe's Home Improvement Warehouse (redevelopment of IBM site), up to 180,000 square feet, store opened March 2010
- San Jose, Almaden Ranch, up to 400,000 square feet, anchor tenant Bass Pro Shop opened October 2015
- Sonora, Lowe's Home Improvement Warehouse, 111,196 square feet; store opened December 2010
- Sonora, Sonora Crossroads, Walmart Discount Store expansion to a Superstore, net increase of 30,000 square feet, groundbreaking May 2017

- Tracy, Tracy Hills Specific Plan, Specific Plan area including 5,499 residential units, 875,300 square feet of commercial retail space, 624,200 square feet of office space, and 4,197,300 square feet of industrial space
- Ukiah, Costco, 148,000-square-foot warehouse membership store, groundbreaking September 2017, opened July 2018
- Victorville, The Crossroads at 395, totaling 303,000 square feet, anchored by a Walmart Superstore, opened May 2014
- Victorville, Dunia Plaza, totaling 391,000 square feet, anchored by a Walmart Superstore and a Sam's Club, replacing existing Walmart Discount Store, opened September 2012
- West Sacramento, Riverpoint Marketplace, totaling 788,517 square feet, anchored by a Walmart Superstore, Ikea, and Home Depot; phased openings beginning March 2006
- Willows, Walmart Superstore totaling 196,929 square feet, replacing existing Walmart Discount Store (subsequently scaled back to a 54,404-square-foot expansion to existing 86,453-square-foot store), opened March 2012
- Walnut Creek, The Orchards at Walnut Creek, mixed-use project including up to 225,000 square feet of retail space, opened September 2016
- Woodland, Home Depot Store, 127,000 square feet; store opened December 2002
- Yuba City, Walmart Superstore, 213,208 square feet, replacing existing Discount Store; store opened April 2006. Discount Store site backfilled by Lowe's Home Improvement Warehouse

***Projects in Progress/Engaged in the Public Process***

- Folsom, Westland-Eagle Specific Plan Amendment, Folsom Ranch, a 643-acre portion of the larger 3,585-acre Folsom Ranch Master Plan area including 977,000 square feet of retail space, along with residential, office, and industrial space (update on status required)
- Oakland, Oakland Waterfront District Park, prepared gentrification, displacement, and urban decay study for the proposed new Oakland A's multi-purpose Major League Baseball ballpark at the Howard Terminal, totaling approximately 55 acres, with a capacity of up to 35,000 persons and additional land uses, including up to 3,000 residential units, 1.5 million square feet of office, a 400-room hotel, up to 270,000 square feet of mixed retail, cultural and civic uses, a 50,000-square-foot performance center, and parking for all Project uses
- San Francisco, Whole Foods, 49,825-square-foot store in the City Center shopping center
- Seaside, Campus Town Specific Plan, a proposed 122.23-acre mixed-use development project developed on a portion of the former Fort Ord Army Base, planned to include maximum buildout of 1,485 housing units, a 250-room hotel, 75 youth hostel beds, 150,000 square feet of retail, dining, and entertainment space, and 50,000 square feet of office, flex, makerspace, and light industrial uses.

***Projects Approved and Beyond Legal Challenges***

- Bakersfield, Bakersfield Commons, totaling 1.2 million square feet of lifestyle retail space and 400,000 square feet of community shopping center space (project engaged in revisioning)
- Bakersfield, Crossroads Shopping Center, totaling 786,370 square feet, anchored by a Target

- Chico, Walmart expansion, expansion of an existing Walmart store plus addition of three development parcels including a fueling station, restaurant, and retail space. In *Chico Advocates for a Responsible Economy v. City of Chico* (2019) 40 Cal.App.5th 839, 849, Court of Appeal found that Urban Decay study adequately evaluated the Project's urban decay impacts.
- Davis, Mace Ranch Innovation Center, an innovation center with 2,654,000 square feet of planned space, including research, office, R&D, manufacturing, ancillary retail, and hotel/conference center. FEIR completed January 2016 and Certified September 2017
- Fairfield, Green Valley Plaza, totaling 465,000 square feet
- Fort Bragg, Grocery Outlet Bargain Market, approved June 2023
- Lincoln, Village 5 Specific Plan, area including 8,200 residential units, 3.1 million square feet of commercial retail space, 1.4 million square feet of office space, a 100-room hotel, and a 71-acre regional sports complex. Final EIR completed 2017. Specific Plan Approved January 2018. Groundbreaking anticipated 2019/2020.
- Kern County, Rosedale and Renfro, totaling 228,966 square feet, anchored by a Target
- Novato, Hanna Ranch, mixed-use project including 44,621 square feet of retail space, 21,190 square feet of office space, and a 116-room hotel
- Pleasanton, Johnson Drive Economic Development Zone, including 189,037 square feet of new general retail space, 148,000 square feet of club retail space, and a 150- or 231-room hotel.
- Roseville, Hotel Conference Center, a 250-room hotel with a 20,000-square-foot conference facility and a 1,200-seat ballroom
- San Francisco, Candlestick Point, 635,000 square feet of regional retail and Hunters Point, with two, 125,000-square-foot neighborhood shopping centers (urban decay study not part of the legal challenge)

## PRINCIPAL INTRODUCTION

**Ms. Amy Herman**, Principal of ALH Economics, has directed assignments for corporate, institutional, non-profit, and governmental clients in key service areas, including commercial market analysis, fiscal and economic impact analysis, economic development and redevelopment, location analysis, strategic planning, and policy analysis. During her career spanning over 30 years, Ms. Herman has supported client goals in many ways, such as to assess supportable real estate development, demonstrate public and other project benefits, to assess public policy implications, and to evaluate and maximize the value of real estate assets. In addition, her award-winning economic development work has been recognized by the American Planning Association, the California Redevelopment Association, and the League of California Cities.

Prior to forming ALH Economics, Ms. Herman worked for 20 years as an urban economist with Sedway Group and then CBRE Consulting's Land Use and Economics practice. Her prior professional work experience included 5 years in the Real Estate Consulting Group of the now defunct accounting firm Laventhol & Horwath (L&H), preceded by several years with the real estate consulting firm Land Economics Group, which was acquired by L&H. During the course of her career, Ms. Herman has established a strong professional network and client base providing access to contacts and experts across a wide spectrum of real estate and urban development resources.

Ms. Herman holds a Master of Community Planning degree from the University of Cincinnati and a Bachelor of Arts degree in urban policy studies from Syracuse University. She pursued additional post-graduate studies in the Department of City and Regional Planning at the University of California at Berkeley. A professional resume for Ms. Herman follows.

ALH | ECON

ALH Urban & Regional Economics

# PROFESSIONAL PROFILE




**AMY L. HERMAN**
**PRINCIPAL**

ALH Urban & Regional Economics
Berkeley, California

T 510.704.1599
aherman@alhecon.com


## SELECT OTHER CLIENTS

- Alameda County Fair
- Arcadia Development Company
- Catellus Development Corporation
- CenterCal Properties
- Claremont University Consortium
- City of Dublin
- Dudek
- Environmental Science Associates
- Equity One
- First Carbon Solutions (formerly Michael Brandman Associates)
- Gresham Savage Nolan & Tilden
- Howard Hughes Corporation
- City of Inglewood
- LSA Associates
- Maximus Real Estate Partners
- The Primary School
- Remy Moose Manley
- Ronald McDonald House
- Signature Flight Support
- Syufy Enterprises
- City of Tracy

Amy L. Herman, Principal of ALH Urban & Regional Economics, has provided urban and regional consulting services for approximately 40 years. During this time, she has been responsible for directing assignments for corporate, institutional, non-profit, and governmental clients in key service areas, including fiscal and economic impact analysis, economic development and redevelopment, feasibility analysis, location analysis, strategic planning, policy analysis, and transit-oriented development. Her award-winning economic development work has been recognized by the American Planning Association, the California Redevelopment Association, and the League of California Cities.

Prior to forming ALH Urban & Regional Economics in 2011, Ms. Herman's professional tenure included 20 years with Sedway Group, inclusive of its acquisition by CB Richard Ellis and subsequent name change to CBRE Consulting. Her prior professional work experience includes five years in the Real Estate Consulting Group of the now defunct accounting firm Laventhol & Horwath (L&H), preceded by several years with the land use consulting firm Land Economics Group, which was acquired by L&H.

Following are descriptions of select consulting assignments managed by Ms. Herman.

## ECONOMIC IMPACT ANALYSIS

***Alameda County.*** Prime consultant for a complex team that prepared a Local Development Business Plan for the newly launched East Bay Community Energy Community Choice Aggregation program for Alameda County. ALH Economics components included economic impact and financial analysis of the local development program components.

***University of California.*** Conducted economic impact studies and frequent updates for five University of California campuses: Berkeley, Davis, Riverside, San Francisco, and San Diego. Prepared models suitable for annual updates by campus personnel.

***Hospital Council of Northern and Central California.*** Prepared an analysis highlighting the economic impacts of hospitals and long-term care facilities in Santa Clara County. The analysis included multiplier impacts for hospital spending, county employment, and wages. Completed a similar study for the Monterey Bay Area Region.

***Bay Area Rapid Transit District.*** Completed economic impact analysis of BART's operations in the San Francisco Bay Area region.

***Various EIR Firms.*** Managed numerous assignments analyzing the potential for urban decay to result from development of major big box stores, shopping centers, and sports venues. The analysis comprises a required Environmental Impact Report component pursuant to CEQA.

## FISCAL IMPACT ANALYSIS

***Stanford Research Park.*** Analyzed historic and current fiscal contributions generated by the Stanford Research Park real estate base and businesses to the City of Palo Alto, Santa Clara County, and the Palo Alto Unified School District.

***City of Concord.*** Structured and managed fiscal impact analysis designed to test the net fiscal impact of multiple land use alternatives pertaining to the reuse of the 5,170-acre former Concord Naval Weapons Station, leading to possible annexation into the City of Concord, California.

***Kimco Realty.*** Prepared fiscal impact analysis of plans to renovate and redevelop part of Westlake Shopping Center and infill development of a 179-unit apartment project adjoining the shopping center.

***Sycamore Real Estate Investments, LLC.*** Prepared a fiscal impact model for client implementation, to test the General Fund net fiscal impacts of alternative land use mixes.

***Residential and Commercial Developers.*** Prepared fiscal impact studies for new development projects, including residential, office, and mixed-use projects, demonstrating the net fiscal impact on the respective city's General Fund and local school districts.

**AMY L. HERMAN**
**Principal**

## ECONOMIC DEVELOPMENT AND PUBLIC FINANCE

***Infrastructure Management Group.*** Contributed to due diligence analysis of the proposed Transbay Transit Center to support evaluation of requested bond loan adjustment requests to support project construction.

***Alameda County.*** Managed numerous assignments helping Alameda County achieve its economic development goals for the County's unincorporated areas through surplus site disposition assistance, including market analysis and financial due diligence for residential and commercial mixed-use developments.

***Office of Community Investment and Infrastructure as Successor Agency to the Redevelopment Agency of the City and County of San Francisco.*** Managed financial analysis estimating the tax payments in lieu of property taxes associated with UCSF development of medical office space in the former Mission Bay Redevelopment Project area.

## LAND USE POLICY

***Union City Property Owner***. Provided an independent analysis regarding the reasonableness of the City of Union City continuing to reserve a key development area for office and/or R&D development in the context of the General Plan Update.

***Alameda County Community Development Agency***. Provided analysis and input regarding the Ashland and Cherryland Business District Specific Plan requirements for non-residential floor space in mixed-use development sites over 10,000 square feet

***DCT Industrial Trust (Subsequently acquired by ProLogis, Inc.).*** Performed economic analysis on a proposed change to the Newark Zoning Ordinance regarding permitted industrial uses. The analysis demonstrated the market, fiscal, and economic impacts that could result from the proposed zoning ordinance change.

***City and County of San Francisco***. Under direction of the San Francisco Planning Department, conducted analysis and literature review regarding residential and commercial displacement, especially they pertained to two planned Mission District mixed-income apartment projects.

## DEVELOPMENT FEASIBILITY

***China Harbour Engineering Company Ltd. (CHEC).*** Prepared a market assessment and development feasibility analysis for the potential development of a 5.54-acre parking lot at the West Oakland BART Station in Oakland, CA for CHEC, the development entity selected by BART to pursue joint development of the site pursuant to an Exclusive Right to Negotiate Agreement.

***Align Real Estate, LLC.*** Prepared independent economic analysis of a proposed residential development in San Francisco on the site of several buildings, including one considered an historic resource pursuant to CEQA. The analysis tested several project alternatives, focusing on net developer margin as an indicator of financial feasibility.

***Build, Inc.*** Conducted financial analysis comparing the development of a prospective San Francisco residential site as a "stand-alone" project compared to a larger "combined lot" project that would incorporate unused floor-area-ratio from an adjacent property.

***Various Residential Developers.*** In support of fiscal impact studies, prepared residential market analysis examining historical development and pricing trends, absorption, and forecasting demand by product type. Prepared achievable pricing estimates by residential unit type and size.

## EDUCATION

- Bachelor of Arts degree in urban studies, magna cum laude, Syracuse University.
- Master of Community Planning degree from the University of Cincinnati.
- Advanced graduate studies in City and Regional Planning at the University of California at Berkeley.

# Appendix B

Netting Report

# NETTING REPORT

To Address Potential Bird Strikes

Prepared by:
Tanner Consulting Group

For:
Kimly-Horn
Costco/Riverside Golf Course
Project

December 13, 2023

Tanner Consulting Group

603 Stanford Court• Valley Springs, CA 95252• Phone: (209) 772-2233 • Fax: (209)772-2230
E-Mail: tannerconsulting@aol.com - Web: www.tannerconsulting.com

# NETTING REPORT
## To Address Potential Bird Strikes

Tanner Consulting Group has specialized in golf course and driving range design for over 38 years. A major portion of our work involves golf and driving range netting design. We have worked on over 500 projects. The subject of birds (as it relates to netting) is one that occasionally comes up during the permitting process and is the subject we will address in this report.

**CONCERN FOR BIRD SAFETY VS. NETTING**

Golf Courses and Driving Ranges throughout the United States use netting as a safety barrier to keep golf balls from exiting a course and causing injuries to people and property. This report will address the netting and its effect on birds.

Golf containment netting is often used in bird aviaries to protect and contain birds in a safe environment. It is a safe and humane way to contain birds and is accepted by bird experts worldwide. This same netting has been installed in and around large buildings and structures to prevent bird strikes into plate glass windows. Studies by the National Audubon Society estimated there are up to one billion bird deaths a year due to plate glass windows. Organizations such as the National Audubon Society and university research centers have monitored glass-skinned skyscrapers and suburban dwellings. They have recorded lethal daily bird strikes into buildings all over the world. Their solution to this problem is netting. Because of these phenomena, Ornithologists have made recommendations to use "netting" to protect the birds from hitting buildings and structures. You may also have observed netting in and around your community designed to protect property such as commercial buildings, open beam structures, loading docks, façades, courtyards, bridges, balconies, storefront signs, garages, barns, or other structures to keep out pest birds. Netting is utilized in many areas as a humane way to deter birds. (See pictures below)

# EXAMPLES OF BIRD PROTECTIVE NETTING









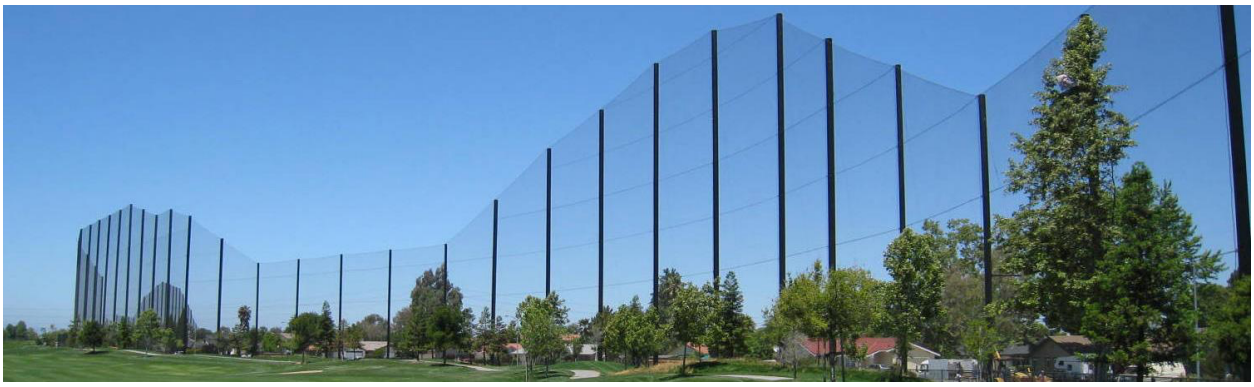


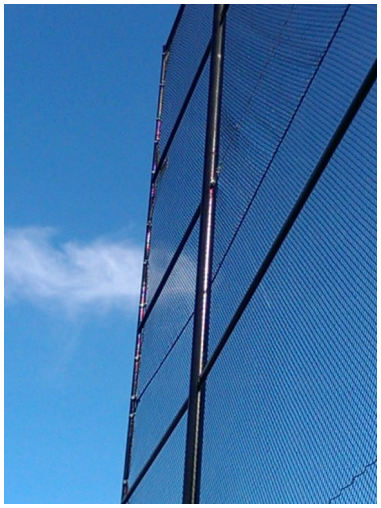




Aviary netting and golf barrier netting are many times the same type of netting and have very similar characteristics and protective abilities. Golf barrier netting is a woven poly material LFS 930 with an opening diameter of 1.4” X 1” and a twine thickness of .0565”. Golf barrier netting is installed in a safe rigid manner that helps prevent birds from becoming entangled. It is affixed tautly making it safe for birds to land on and making it difficult to become trapped. *In the unlikelihood that a bird does become entangled in the netting, staff can easily be trained to facilitate release.*

## EXAMPLE OF GOLF NETTING INSTALLATION







Tanner Consulting Group has designed numerous golf netting barrier projects in the California, including the San Jose State University Men’s and Women’s Golf Training

Center. The netting used at SJSU is the same netting specified for your project and was installed to 165 feet tall. Head Coach John Kennaday reported they have not had any birds trapped or die due to the netting. TCG has also met with the National Audubon Society regarding bird strikes and has conducted our own surveys on bird strikes at golf courses and/or golf driving ranges in California, most recently a survey of 35 San Francisco Bay area golf course and/or golf driving ranges. These facilities reported they had no birds trapped and no bird deaths related to golf netting. There were also no notifications of birds being injured by golf netting.

*(Additionally, we always like to acknowledge and address the subject of Bats vs. netting as this subject comes up from time to time. Bats use echolocation to navigate at night and send out sound waves that bounce off objects. Using these echoes, bats can detect object as thin as a human hair in complete darkness. It is highly unlikely that bats would collide with the nets during flight. There have been no cases of bat entanglement in any netting projects that we have been advised of.)*

**CONCLUSION**

Riverside Golf Course currently has netting on the driving range. This netting has been in use for many years. Riverside staff have not seen or been aware of any bird strikes or bird injury/deaths related to this netting. The likelihood of the additional netting attributing to bird strikes or deaths is very minimal to non-existent.

Netting has proven to be very safe for protecting birds of all types whether it is to prevent strikes into a golf course/range, deterrent to plate glass windows, or to offer a protective environment in bird sanctuaries. Zoos throughout the Country use these same netting products to develop safe and comfortable habitat for birds of all types and sizes including endangered species.

Because of growth and development around the golf facilities, special attention has been given to the protection of new and existing structures and their occupants. The recommendations by Tanner Consulting Group help contain golf balls in the facility. We do not feel the proposed netting will have any significant impact on birds or wildlife.

**Ascent Environmental**
455 Capitol Mall, Suite 300
Sacramento, CA 95814

ascentenvironmental.com

# Fresno Costco Commercial Center Project

## MITIGATION MONITORING AND REPORTING PROGRAM

State Clearinghouse No. 2021100443

City of Fresno

February 2024

# MITIGATION MONITORING AND REPORTING PROGRAM

## INTRODUCTION

CEQA and the State CEQA Guidelines (PRC Section 21081.6 and State CEQA Guidelines Sections 15091[d] and 15097) require public agencies "to adopt a reporting and monitoring program for changes to the project which it has adopted or made a condition of project approval to mitigate or avoid significant effects on the environment." A Mitigation Monitoring and Reporting Program (MMRP) is required for the proposed project because the EIR identifies potential significant adverse impacts related to the project implementation, and mitigation measures have been identified to reduce those impacts.

## PURPOSE OF MITIGATION MONITORING AND REPORTING PROGRAM

This MMRP has been prepared to ensure that all required mitigation measures are implemented and completed in a satisfactory manner prior to implementation of the proposed project. The attached table has been prepared to assist the responsible parties in implementing the mitigation measures. The table identifies the mitigation measures, monitoring responsibility, mitigation timing, and provides space to confirm implementation of the mitigation measures. The numbering of mitigation measures follows the numbering sequence found in the Draft EIR. Mitigation measures that are referenced more than once in the Draft EIR are not duplicated in the MMRP table.

## ROLES AND RESPONSIBILITIES

Unless otherwise specified herein, the project applicant or its designee is responsible for taking all actions necessary to implement the mitigation measures under its jurisdiction according to the specifications provided for each measure and for demonstrating that the action has been successfully completed. The City of Fresno shall confirm implementation of all measures under its jurisdiction according to the specifications provided for each measure.

Inquiries should be directed to:

Jose Valenzuela, Supervising Planner
City of Fresno Planning and Development Department
2600 Fresno Street, Third Floor, Room 3043
Fresno, CA 93721
Phone: (559) 621-8070
Email: Jose.Valenzuela@fresno.gov

The location of this information is:

City of Fresno
2600 Fresno Street, Third Floor, Room 3043
Fresno, CA 93721

## MITIGATION MONITORING AND REPORTING PROGRAM TABLE

The categories identified in the attached MMRP table are described below.

- Mitigation Measure – This column provides the verbatim text of the adopted mitigation measure.
- Implementation Responsibility – This column identifies the party responsible for implementing the mitigation measure.
- Timing – This column identifies the time frame in which the mitigation will be implemented.
- Verification – This column is to be dated and signed by the person (either project manager or his/her designee) responsible for verifying compliance with the requirements of the mitigation measure.

## Mitigation Monitoring and Reporting Program

| Mitigation Measures | Implementation Responsibility | Timing | Verification |
|---|---|---|---|
| **Archaeological, Historical, and Tribal Cultural Resources** | | | |
| **Mitigation Measure 3.4-1a: Develop and Implement a Worker Environmental Awareness Program**<br>The applicant shall retain a qualified professional archaeologist meeting the Secretary of the Interior's Professional Qualification Standards for archaeologists to prepare a worker environmental awareness program. The program shall be provided to all construction personnel and supervisors who will have the potential to encounter and alter archaeological resources. A copy of the worker environmental awareness program shall be provided to the City's Planning Division before construction activities begin. The topics to be addressed in the worker environmental awareness program will include, at a minimum:<br>▶ types of cultural resources expected on the project site;<br>▶ types of evidence that indicates cultural resources might be present (e.g., glass shards, lithic scatters);<br>▶ what to do if a worker encounters a possible resource;<br>▶ what to do if a worker encounters animal bones or possible human bones; and<br>▶ repercussions for removing or intentionally disturbing archaeological resources. | Project Applicant | Before construction activities begin | |
| **Mitigation Measure 3.4-1b: Retain an Archaeological Monitor and Native American Monitor, and Halt Ground-Disturbing Activity upon Discovery of Subsurface Archaeological Features or Tribal Cultural Resources**<br>In the event that any historic-era subsurface archaeological features or deposits (e.g., glass, metal, and/or ceramic refuse scatters), or prehistoric subsurface archaeological features or deposits (e.g., locally darkened soil ("midden"), stone tool chipping debris, bones, shell beads, or concentrated charcoal layers), are discovered during construction, all ground-disturbing activity within 50 feet of the resources shall be halted and the City shall be notified. The applicant will then retain the services of a qualified professional archaeologist to assess the significance of the find. Specifically, the archaeologist shall determine whether the find qualifies as an historical resource, a unique archaeological resource, or tribal artifacts. If the find does fall within one of these three categories, the qualified archaeologist shall then make recommendations to the City regarding appropriate procedures that should be used to protect the integrity of the resource and to ensure that no additional resources are affected. Procedures could include preservation in place, archival research, subsurface testing, and/or data recovery, with preservation in place being the preferred option if feasible. If the find is a tribal artifact, the City shall provide a reasonable opportunity for input from a Native American tribal representative affiliated with the location of the discovery; affiliation shall be determined by the City, in consultation with the qualified archaeologist, based on the City's AB 52 list or the | Project Applicant and Construction Contractors | During construction activities | |

| Mitigation Measures | Implementation Responsibility | Timing | Verification |
|---|---|---|---|
| contact list provided by the NAHC. If responsive, the tribal representative will then determine whether the artifact is considered a tribal cultural resource, as defined by PRC Section 21074. The applicant, in consultation with the City and Tribe, shall implement the recommended preservation options (which may include preservation in place, data recovery, mapping, capping, or avoidance), and proper curation of significant artifacts, if it determines that the measures are feasible in light of project design, logistics, and cost considerations. | | | |
| **Mitigation Measure 3.4-4: Halt Ground-Disturbing Activity upon Discovery of Subsurface Paleontological Resources**<br>If paleontological resources are discovered during earthmoving activities, the project applicant shall immediately halt operations within 30 feet of the find and notify the City. If the find is determined to be significant, it shall be salvaged by a qualified paleontologist retained by the project applicant following the standards of the SVP (2010) and curated at a certified repository such as the University of California Museum of Paleontology. | Project Applicant and Construction Contractors | During construction activities | |
| **Biological Resources** | | | |
| **Mitigation Measure 3.5-1a: Conduct Take Avoidance Survey for Burrowing Owl, Implement Avoidance Measures, and Compensate for Loss of Occupied Burrows**<br>▶ A qualified biologist shall conduct a focused survey for burrowing owls in accessible areas (i.e., not including private property) of habitat suitable for the species on and within 1,640 feet (500 meters) of the project site no less than 14 days before initiating ground disturbance activities using survey methods described in Appendix D of the CDFW 2012 Staff Report (CDFW 2012). Much of the area within this 1,640-foot survey area does not contain habitat suitable for burrowing owl (e.g., residential areas, commercial development, roads) and would not require surveys. Inaccessible areas that contain habitat suitable for burrowing owl (e.g., the Riverside Golf Course property) shall be surveyed using binoculars or a spotting scope.<br>▶ If no occupied burrows are found, the qualified biologist shall submit a report documenting the survey methods and results to the City of Fresno, and no further mitigation shall be required.<br>▶ If an active burrow is found within 1,640 feet of pending construction activities during the nonbreeding season (September 1 through January 31), the applicant shall establish and maintain a minimum protection buffer of 164 feet (50 meters) around the occupied burrow throughout construction. If an active burrow is found on property outside of the project site (e.g., the Riverside Golf Course), then the protection buffer shall be established on a map, and only the portion of the buffer within the project site shall be marked with fencing, flagging, or other means. The actual buffer size shall be determined by the qualified biologist based on the time of year and level of disturbance in accordance with guidance provided in the CDFW Staff Report on Burrowing Owl Mitigation (CDFW 2012). The protection buffer may be adjusted if, in consultation with CDFW, a qualified biologist | Project Applicant | Before construction activities begin (no less than 14 days prior to ground disturbance) and during construction activities | |

| Mitigation Measures | Implementation Responsibility | Timing | Verification |
|---|---|---|---|
| determines that an alternative buffer shall not disturb burrowing owl use of the burrow because of particular site features or other buffering measures. If occupied burrows are present that cannot be avoided or adequately protected with a no-disturbance buffer, a burrowing owl exclusion plan shall be developed, as described in Appendix E of the CDFW Staff Report. Burrowing owls shall not be excluded from occupied burrows until the project burrowing owl exclusion plan is approved by CDFW. The exclusion plan shall include a compensatory habitat mitigation plan (see below).<br>▶ If an active burrow is found during the breeding season (February 1 through August 31), occupied burrows shall not be disturbed and shall be provided with a protective buffer at a minimum of 164 feet unless a qualified biologist verifies through noninvasive means that either: (1) the birds have not begun egg laying, or (2) juveniles from the occupied burrows are foraging independently and are capable of independent survival. The size of the buffer may be adjusted depending on the time of year and level of disturbance as outlined in the CDFW 2012 Staff Report. If an active burrow is found on property outside of the project site (e.g., the Riverside Golf Course), then the protection buffer shall be established on a map, and only the portion of the buffer within the site shall be marked with fencing, flagging, or other means. The size of the buffer may be reduced if a broad-scale, long-term, monitoring program acceptable to CDFW is implemented so that burrowing owls are not adversely affected. Once the fledglings are capable of independent survival, the owls can be evicted, and the burrow can be destroyed per the terms of a CDFW-approved burrowing owl exclusion plan developed in accordance with Appendix E of CDFW 2012 Staff Report.<br>▶ If burrowing owls are evicted from burrows and the burrows are destroyed by implementation of project activities, the applicant shall mitigate the loss of occupied habitat in accordance with guidance provided in the CDFW 2012 Staff Report, which states that permanent impacts on nesting, occupied, and satellite burrows, and burrowing owl habitat (i.e., grassland habitat with suitable burrows) shall be mitigated such that habitat acreage and number of burrows are replaced through permanent conservation of comparable or better habitat with similar vegetation communities and burrowing mammals (e.g., ground squirrels) present to provide for nesting, foraging, wintering, and dispersal. The applicant shall retain a qualified biologist to develop a burrowing owl mitigation and management plan that incorporates the following goals and standards:<br>▪ Mitigation lands shall be selected based on comparison of the habitat lost to the compensatory habitat, including type and structure of habitat, disturbance levels, potential for conflicts with humans, pets, and other wildlife, density of burrowing owls, and relative importance of the habitat to the species throughout its range. | | | |

| Mitigation Measures | Implementation Responsibility | Timing | Verification |
|---|---|---|---|
| ▪ If feasible, mitigation lands shall be provided adjacent or proximate to the project site so that displaced owls can relocate with reduced risk of injury or mortality. Feasibility of providing mitigation adjacent or proximate to the project site depends on availability of sufficient habitat to support displaced owls that may be preserved in perpetuity.<br>▪ If habitat suitable for burrowing owl is not available for conservation adjacent or proximate to the project site, mitigation lands can be secured off-site and shall aim to consolidate and enlarge conservation areas outside of planned development areas and within foraging distance of other conservation lands. Mitigation may be also accomplished through purchase of mitigation credits at a CDFW-approved mitigation bank, if available. Alternative mitigation sites and acreages may also be determined in consultation with CDFW.<br>▪ If burrowing owl habitat mitigation is completed through permittee-responsible conservation lands, the mitigation plan shall include mitigation objectives, site selection factors, site management roles and responsibilities, vegetation management goals, financial assurances and funding mechanisms, performance standards and success criteria, monitoring and reporting protocols, and adaptive management measures. Success shall be based on the number of adult burrowing owls and pairs using the site and if the numbers are maintained over time. Measures of success, as suggested in the CDFW 2012 Staff Report, shall include site tenacity, number of adult owls present and reproducing, colonization by burrowing owls from elsewhere, changes in distribution, and trends in stressors. | | | |
| **Mitigation Measure 3.5-1b: Conduct Focused Surveys for Swainson's Hawk, White-Tailed Kite, Other Nesting Raptors, and Other Native Nesting Birds and Implement Protective Buffers**<br>▶ To minimize the potential for loss of Swainson's hawk, white-tailed kite, other raptors, and other native birds, project construction activities (e.g., tree removal, vegetation clearing, ground disturbance, staging) shall be conducted during the nonbreeding season (approximately September 1-January 31, as determined by a qualified biologist), if feasible. If project construction activities are conducted during the nonbreeding season, no further mitigation shall be required.<br>▶ Within 14 days before the onset of project construction activities during the breeding season (approximately February 1 through August 31, as determined by a qualified biologist), a qualified biologist familiar with birds of California and with experience conducting nesting bird surveys shall conduct focused surveys for Swainson's hawk, white-tailed kite, other nesting raptors, and other native birds. Surveys shall be conducted in accessible areas (i.e., not including private property) within 0.5 mile of the project site for Swainson's hawk and white-tailed kite; within 500 feet of the site for other raptors; and within 50 feet of the site for non-raptor common native bird nests. Inaccessible areas that contain habitat suitable for nesting birds (e.g., the Riverside Golf Course property) shall be surveyed using binoculars or a spotting scope. | Project Applicant | Before construction activities begin (with 14 days of ground disturbance) and during construction activities | |

| Mitigation Measures | Implementation Responsibility | Timing | Verification |
|---|---|---|---|
| ▶ If no nests are found, the qualified biologist shall submit a report documenting the survey methods and results to the City of Fresno, and no further mitigation shall be required.<br>▶ Impacts on nesting birds shall be avoided by establishing appropriate buffers around active nest sites identified during focused surveys to prevent disturbance to the nest. Project construction activity, including tree removal, shall not commence within the buffer areas until a qualified biologist has determined that the young have fledged, the nest is no longer active, or reducing the buffer would not likely result in nest abandonment. An avoidance buffer shall be implemented for Swainson's hawk and white-tailed kite in consultation with CDFW. CDFW guidelines recommend implementation of 0.25- or 0.5-mile-wide buffers for Swainson's hawk nests, but the size of the buffer may be decreased if a qualified biologist and the City of Fresno, in consultation with CDFW, determine that such an adjustment would not be likely to adversely affect the nest. For other species, a qualified biologist shall determine the size of the buffer for nests of non-special-status species after a site- and nest-specific analysis. Buffers typically shall be 500 feet for common raptors. Buffer size for non-raptor common bird species generally shall be at least 20 feet. Factors to be considered for determining buffer size shall include presence of natural buffers provided by vegetation or topography, nest height above ground, baseline levels of noise and human activity, species sensitivity, and proposed project construction activities. The size of the buffer may be adjusted if a qualified biologist determines that such an adjustment would not be likely to adversely affect the nest. Any buffer reduction for a listed or fully protected species (i.e., Swainson's hawk, white-tailed kite) shall require consultation with CDFW. If an active nest is found on property outside of the project site (e.g., the Riverside Golf Course), then the protection buffer shall be established on a map, and only the portion of the buffer within the project site shall be marked with fencing, flagging, or other means. Periodic monitoring of the nest by a qualified biologist during project construction activities shall be required if the activity has potential to adversely affect the nest, the buffer has been reduced, or if birds within active nests are showing behavioral signs of agitation (e.g., standing up from a brooding position, flying off the nest) during project construction activities, as determined by the qualified biologist. | | | |
| **Noise and Vibration** | | | |
| **Mitigation Measure 3.11-1: Implement Additional Measures to Reduce Exposure to Noise Reduction during Noise-Sensitive Time Periods**<br>For all outdoor construction activity that is to take place outside of the City of Fresno construction noise exception timeframes (i.e., 10:00 p.m. and 7:00 a.m., Monday through Saturday, and all hours of the day on Sunday), and that is anticipated to generate interior noise levels at sensitive receptors that exceed the City of Fresno General Plan interior noise standard of 45 dB for residential land uses, the construction contractor shall comply with the following measures: | Project Applicant | During construction activities | |

| Mitigation Measures | Implementation Responsibility | Timing | Verification |
|---|---|---|---|
| ▶ Consistent with Section 10-110 of the City Noise Control Ordinance, obtain an exception to Article 1, "Noise Regulations," through the Chief Administrative Officer. A permit may be issued authorizing noises prohibited by the noise ordinance whenever it is found that the public interest will be served thereby or that extreme hardship will result from the strict enforcement.<br>▶ Install temporary noise curtains as close as possible to the noise-generating activity such that the curtains obstruct the direct line of sight between the noise-generating construction activity and the nearby sensitive receptors. Temporary noise curtains shall consist of durable, flexible composite material featuring a noise barrier layer bounded to sound-absorptive material on one side. The noise barrier layer shall consist of rugged, impervious, material with a surface weight of at least one pound per square foot.<br>▶ Noise-reducing enclosures and techniques shall be used around stationary noise-generating equipment (e.g., concrete mixers, generators, compressors).<br>▶ Operate heavy-duty construction equipment at the lowest operating power possible. All construction equipment shall be properly maintained and equipped with noise-reduction intake and exhaust mufflers and engine shrouds, in accordance with manufacturers' recommendations. Equipment engine shrouds shall be closed during equipment operation.<br>▶ Where available and feasible, construction equipment with back-up alarms shall be equipped with either audible self-adjusting backup alarms or alarms that only sound when an object is detected. Self-adjusting backup alarms shall automatically adjust to 5 dB over the surrounding background levels. All non-self-adjusting backup alarms shall be set to the lowest setting required to be audible above the surrounding noise levels.<br>▶ Provide a minimum of one week of advanced notice to owners of all residential located within 350 feet of where nighttime construction activity would take place. This noticing shall inform the recipients of when and where nighttime construction would occur and the types of measures being implemented to lessen the impact at potentially affected receptors. This noticing shall also provide the contact information for the designated disturbance coordinator. The disturbance coordinator shall receive all public complaints and be responsible for determining the cause of the complaint and implementing any feasible measures to alleviate the problem. | | | |
| **Mitigation Measure 3.11-3: Reduce Exposure of Existing Sensitive Receptors to Noise Generated by Loading Dock Activity**<br>The project applicant shall construct a sound wall or other noise attenuating feature west of the loading docks with a demonstrated ability to result in a 4 dB noise decrease at the existing residences along North Riverside Drive. | Project Applicant | Prior to issuance of certificates of occupancy | |

| Mitigation Measures | Implementation Responsibility | Timing | Verification |
|---|---|---|---|
| **Mitigation Measure 3.11-5: Implement Traffic Noise Reduction Measures along North Riverside Drive**<br>The project proponent shall implement noise reduction measures to ensure that exterior noise levels at residential land uses near the west side of North Riverside Drive do not exceed the City's current noise standard of 65 dB $L_{dn}$/CNEL under existing-plus-project conditions. This measure is consistent with General Plan Policy NS-1-I, which recommends the use of design alterations to reduce noise impacts. This performance standard can be achieved using any combination of the following measures. Therefore, if one option is not implemented, the other would be required.<br>▶ Pave the roadway segment with rubberized hot-mix asphalt or equivalent surface treatment with known noise-reducing properties on top of the roadway surface. The rubberized hot-mix asphalt overlay shall be designed with appropriate thickness and rubber component quantity (typically 15 percent by weight of the total blend), such that traffic noise levels are reduced by an average of 4 to 6 dB (noise levels vary depending on travel speeds, meteorological conditions, and pavement quality) as compared to noise levels generated by vehicle traffic traveling on standard asphalt. Rubberized hot-mix asphalt has been found to achieve this level of noise reduction in other parts of California (Sacramento County 1999). Pavement will require more frequent than normal maintenance and repair to maintain its noise attenuation effectiveness. The applicant shall fund the incremental cost for maintaining the roadway segment with the surface treatment.<br>▶ Construct a sound barrier taller than the 6-foot cinderblock wall that is currently present from West Spruce Avenue to West Herndon Avenue. The sound barrier shall be constructed of solid material (e.g., wood, brick, adobe, an earthen berm, boulders, or combination thereof). The reflectivity of each sound barrier shall be minimized to ensure that traffic noise reflected off the barrier does not contribute to an exceedance of applicable $L_{eq}$ standards at other receptors. The level of sound reflection from a barrier can be minimized with a textured or absorptive surface or with vegetation on or next to the barrier. A barrier that breaks the line of sight between a source and a receiver will typically result in at least 5 dB of noise reduction (Caltrans 2013: 2-41; FTA 2018: 42). Barriers higher than the line of sight provide increased noise reduction (FTA 2018: 16). Scenic quality factors shall be taken into account during design, such as using more natural materials (e.g., berms and boulders) to reduce the visible mass of a wall. All barriers shall be designed to blend into the landscape along the roadway, to the extent feasible. Ensuring a character consistent with the surrounding area may involve the use of strategically placed native trees or other vegetation; the addition of special materials (e.g., wood or stonework) on the façade of the sound wall; and/or a sound wall that is covered in vegetation. Additionally, the sound barrier shall meet the standards established in General Plan Policy NS-1-o which establishes aesthetic considerations for sound walls | Project Applicant | Prior to issuance of certificates of occupancy | |

| Mitigation Measures | Implementation Responsibility | Timing | Verification |
|---|---|---|---|
| including a maximum allowable height of 15 feet. If the sound barriers ensure that exterior traffic noise levels on the residential properties would not exceed 60 dB $L_{eq}$, then the applicant shall not be required to pave the roadway with a special low-noise surface treatment. Sound wall construction would only be implemented if all of the property owners on the west side of North Riverside Drive between West Herndon Avenue and West Spruce Avenue collectively agree to the mitigation. | | | |
| **Transportation and Circulation** | | | |
| **Mitigation Measure 3.13-2: Provide a Program to Reduce Costco Employees' VMT by at least 26 Percent**<br>Costco shall provide a program that is designed to achieve at least a 26 percent reduction in employee VMT. The program shall be provided to the City for acceptance prior to issuance of a certificate of occupancy. Specific actions must include the following measures described in the California Air Pollution Control Officers Association's 2021 Handbook for Analyzing Greenhouse Gas Emission Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equity:<br>▶ **Commute Trip Reduction Marketing (estimated to result in up to 4 percent employee VMT reduction):** Costco shall implement a marketing strategy to promote Costco's commute reduction program. Information sharing and marketing promote and educate employees about their travel choices to the employment location beyond driving such as carpooling, taking transit, walking, and biking, thereby reducing VMT and greenhouse gas emissions. The following features (or similar alternatives) shall be provided:<br>▪ on-site or online commuter information services,<br>▪ employee transportation coordinators,<br>▪ on-site or online transit pass sales, and<br>▪ guaranteed ride home service.<br>▶ **Provide Ridesharing Program (estimated to result in up to 8 percent employee VMT reduction):** Costco shall develop and implement a ridesharing program. Ridesharing encourages carpooled vehicle trips in place of single-occupied vehicle trips, thereby reducing the number of trips, VMT, and greenhouse gas emissions. The following strategies provide examples of a multifaceted approach for promoting a rideshare program:<br>▪ designating a certain percentage of desirable parking spaces for ridesharing vehicles,<br>▪ designating adequate passenger loading and unloading and waiting areas for ridesharing vehicles, and<br>▪ providing an app or website for coordinating rides. | Project Applicant | Prior to issuance of certificates of occupancy | |

| Mitigation Measures | Implementation Responsibility | Timing | Verification |
|---|---|---|---|
| ▶ **Implement Subsidized or Discount Transit Program (estimated to result in up to 5.5 percent employee VMT reduction):** Costco shall provide free transit passes for employees. Reducing the out-of-pocket cost for choosing transit improves the competitiveness of transit against driving, increasing the total number of transit trips and decreasing vehicle trips. This decrease in vehicle trips results in reduced VMT and, thus, a reduction in greenhouse gas emissions.<br>▶ **Provide End-of-Trip Bicycle Facilities (estimated to result in up to 4.4 percent employee VMT reduction):** Costco shall install and maintain end-of-trip facilities for employee use. End-of-trip facilities include elements such as bike parking, bike lockers, showers, and personal lockers. The provision and maintenance of secure bike parking and related facilities encourages commuting by bicycle, thereby reducing VMT and greenhouse gas emissions.<br>▶ **Improve Street Connectivity (estimated to result in up to 30 percent employee VMT reduction):** Costco shall construct West Spruce Avenue along the northern site boundary, creating new connections between West Spruce Avenue and North Aurther Avenue. The increased connectivity and intersection density that would result from these improvements would facilitate shorter trips, thereby reducing VMT.<br>▶ **Provide Pedestrian Network Improvements/Construct Bike Facilities/Expand Bikeway Network (estimated to result in up to 10 percent employee VMT reduction[1]):** Costco shall construct new, 12-foot-wide pedestrian and bicycle paths along West Herndon Avenue and North Riverside Drive to improve pedestrian access and connect to a larger bicycle network. This encourages a mode shift from automobiles to biking and walking, resulting in VMT reduction. | | | |
| **Mitigation Measure 3.13-3: Provide Off-Site Improvements**<br>Costco shall provide the following off-site improvements to alleviate queuing that would result in transportation hazards to the greatest extent feasible prior to issuance of building permit:<br>▶ North Golden State Boulevard and West Herndon Avenue: Revise signal phasing to optimize green-time allocation relative to anticipated volumes. To reduce queue blockage of the intersection, "DO NOT BLOCK" pavement markings are required for the full width of North Weber Avenue. On the north leg of the intersection (i.e., North Golden State Boulevard, northeast of West Herndon Avenue), reconstruct the median to extend the south bound dual left-turn pocket as far north as possible without interfering with the existing north bound left-turn pocket at West Kathryn Avenue.<br>All off-site improvements shall be designed in accordance with City roadway design standards and are subject to review by the City and responsible emergency service providers. | Project Applicant and City of Fresno | Prior to issuance of certificates of occupancy | |

[1] Measures T-18 through T-22-C are in the Neighborhood Design subsector. The VMT reduction from the combined implementation of all measures within this subsector is capped at 10 percent (CAPCOA 2021: 135).

# Fresno Costco Commercial Center Project

## Findings and Facts in Support of Findings
## and
## Statement of Overriding Considerations

State Clearinghouse No. 2021100443

City of Fresno

February 2024

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# LIST OF ABBREVIATIONS

| | |
|---|---|
| APN | assessor's parcel number |
| BMP | best management practice |
| CCR | California Code of Regulations |
| CDFW | California Department of Fish and Wildlife |
| CEQA | California Environmental Quality Act |
| City | City of Fresno |
| CNEL | Community Noise Equivalent Level |
| Costco | Costco Wholesale Corporation |
| dB | decibels |
| EIR | environmental impact report |
| FAR | floor area ratio |
| Findings | Findings of Fact |
| FMFCD | Fresno Metropolitan Flood Control District |
| GHGRP | Greenhouse Gas Reduction Plan |
| $L_{dn}$ | day-night level |
| $L_{eq}$ | energy-equivalent noise level |
| MMRP | mitigation monitoring and reporting program |
| $MTCO_2e$ | metric tons of carbon dioxide equivalent |
| NOP | notice of preparation |
| PRC | Public Resources Code |
| RWQCB | Regional Water Quality Control Board |
| SJVAPCD | San Joaquin Valley Air Pollution Control District |
| SR | State Route |
| TIA | *Fresno Costco Relocation Transportation Impact Analysis* |
| VMT | vehicle miles traveled |

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# 1 INTRODUCTION

The Costco Wholesale Corporation (Costco), the project applicant, proposes to construct a membership-only Costco Commercial Center, including a new warehouse with an attached tire center and home delivery services, and a detached gas station and drive-through car wash. The proposed project site is a vacant 22.4-acre parcel located at the northeast corner of the intersection of West Herndon Avenue and North Riverside Drive in the City of Fresno. An environmental impact report (EIR) has been prepared under the direction of City of Fresno (City), the lead agency under the California Environmental Quality Act (CEQA), in accordance with the requirements of CEQA (Public Resources Code [PRC] Section 21000 et seq.) and the State CEQA Guidelines.

The existing Costco facility on West Shaw Avenue would be relocated to the project site. Costco has occupied the commercial building at 4500 West Shaw Avenue in the city of Fresno since 1985. Costco's customer base has outgrown the capacity of the current facility, which could lead to future traffic and parking concerns. The new facility would serve the same customers as the existing facility plus anticipated growth in the area. The project would also allow Costco to expand services in the area to include an additional gas station and a car wash, as well as a loading area to facilitate delivery of purchases directly to homes in the Fresno area.

This statement of Findings of Fact (Findings) has been prepared in accordance with CEQA and its implementing guidelines (California Code of Regulations [CCR] Title 14, Section 15000 et seq.) to address the environmental effects associated with the proposed Costco Commercial Center Project. PRC Section 21081 and Section 15091 of the State CEQA Guidelines require that the lead agency prepare written Findings for identified significant impacts, accompanied by a brief explanation for the rationale for each finding. Section 15091 of the State CEQA Guidelines states, in part:

> a) No public agency shall approve or carry out a project for which an EIR has been certified which identifies one or more significant environmental effects of the project unless the public agency makes one or more written findings for each of those significant effects, accompanied by a brief explanation of the rationale for each finding. The possible findings are:
>
> > 1) Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the Final EIR.
> >
> > 2) Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can and should be adopted by such other agency.
> >
> > 3) Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or project alternatives identified in the final EIR.

The EIR for the project identified potentially significant effects that could result from project implementation. The City finds that the inclusion of mitigation measures as part of the project approval would reduce most, but not all, of those effects to a less-than-significant level. Those impacts that are not reduced to a less-than-significant level are identified and overridden due to specific project benefits in a Statement of Overriding Considerations.

The following sections make detailed Findings with respect to the potential effects of the project and refer, where appropriate, to the mitigation measures set forth in the EIR to avoid or substantially reduce potentially significant adverse impacts of the project. The EIR and the administrative record concerning the project provide additional facts in support of the Findings herein. The Draft and Final EIR are hereby incorporated into these Findings in their entirety. Furthermore, the mitigation measures set forth in the Mitigation Monitoring and Reporting Program (MMRP) are incorporated by reference into these Findings.

The Fresno City Council (City Council) is the decision-making authority for the project. The City Council adopts these Findings in that capacity.

# 2 PROJECT SUMMARY

## 2.1 PROJECT LOCATION

The project site is a 22.4-acre parcel located at the northeast corner of the intersection of West Herndon Avenue and North Riverside Drive in the city of Fresno. The project site is bordered by West Spruce Avenue to the north, the right-of-way of (currently unbuilt) North Arthur Avenue to the east, West Herndon Avenue to the south, and North Riverside Drive to the east. The project site's address is 7120 North Riverside Drive and the assessor's parcel number (APN) is 50302012. Local access to the site is provided by West Herndon Avenue, West Spruce Avenue, and North Riverside Drive. Regional access is provided by State Route (SR) 99, via the West Herndon Avenue interchange approximately 0.5 mile to the southwest.

## 2.2 PROJECT ELEMENTS

The Costco Commercial Center would include a warehouse retail building, gas station, and car wash. The size of each project element, as revised in the Final EIR, is summarized below in Table 2-1.

**Table 2-1 Project Elements**

| Structure | Area (square feet) |
|---|---|
| **Warehouse Retail Building Footprint** | **219,216** |
| Warehouse/Retail | 163,539 |
| Loading/Back of house/Storage/Receiving | 4,422 |
| Market delivery operation | 46,834 |
| Open canopy space | 3,233 |
| Building envelope | 1,188 |
| **Fuel canopy** | **12,885** |
| **Car wash** | **4,800** |

Source: Data provided by Urban Planning Partners in 2022 and 2023.

The project would also include construction of off-site improvements to improve circulation and provide utilities to the site. Specific improvements include the following and are depicted in Figure 2-10:

1. Installation of a traffic signal at the intersection of West Fir Avenue, North Riverside Drive, and the main Costco driveway.
2. The construction of a private 36-foot asphalt right-of-way (currently named North Arthur Avenue) running along the eastern boundary of the project site.
3. Construction of the intersection of West Herndon Avenue and North Arthur Avenue to allow right-in/right-out and left-in turning, which would require a median cut on West Herndon Avenue.
4. The construction of West Spruce Avenue from North Riverside Drive to the intersection with North Sandrini Avenue. The asphalt roadway would include curb, gutter, sidewalk, and streetlights, as well as the installation of sewer and water mains underneath this portion of West Spruce Avenue. Existing turf and mature trees within the right-of-way would be removed. In addition, the existing irrigation system at the golf course and path for the golf carts would be relocated. A new fence and nets to prevent errant balls from striking vehicles and pedestrians would be installed along the northern boundary of the roadway.
5. Improvements to the intersection of West Herndon Avenue and North Riverside Drive.

6. Improvements to North Riverside Drive, including moving the concrete median approximately 5 feet to the west, construction of a second southbound left-turn lane, construction of a second northbound lane, and construction of a 12-foot-wide multiuse trail and a 3-foot-tall, landscaped berm between trail and parking lot.
7. The construction of pedestrian and bicycle facilities, including a trail as identified by the City's Active Transportation Plan along the project site's frontage with West Herndon Avenue.

### 2.2.1 General Plan Amendments and Rezoning

The proposed Costco warehouse building is consistent with established zoning for the parcel; however, an amendment to the City of Fresno's General Plan and rezoning of the site would be required to permit the proposed car wash. The project would require a general plan amendment to change the land use designation of the project site from Community Commercial (CC) to General Commercial (CG). The General Commercial designation proposed for the site is described in Urban Form, Land Use, and Design Element of the General Plan as appropriate for retail and service uses that may generate high volumes of vehicle traffic. Similarly, the project site would be rezoned from CC to CG.

The project also includes a proposed General Plan amendment and rezoning to reclassify West Herndon Avenue from North Riverside Drive to North Hayes Avenue as a superarterial. West Herndon Avenue is designated, depending on the specific segment, as either an expressway or superarterial, the two highest roadway classifications in the General Plan, throughout the project site's vicinity and is designated as a superarterial between the project site and SR 99. The project includes a general plan amendment to reclassify the portion of West Herndon Avenue between North Riverside Drive and North Hayes Avenue from expressway to superarterial to allow the construction of an intersection where West Herndon Avenue meets the private North Arthur Avenue right-of-way. The current classification of expressway would not permit the construction of this intersection. The proposed intersection where West Herndon Avenue meets the North Arthur Avenue right-of-way would allow access to the project site via two north-south streets, rather than solely from North Riverside Drive. This may result in easier travel for southbound drivers along North Riverside Drive, including nearby residents and visitors to the Riverside Golf Course.

### 2.2.2 Planned Development Permit

Article 59 of Chapter 15 of the Fresno Municipal Code establishes regulations and procedures for Planned Development Permits (PD Permits), which are permits for "development on large areas of land and infill sites to allow for projects that desire greater flexibility than already provided for in this Code." The PD Permit process allows developments to request deviations from development standards to respond to site conditions in more customized and tailored manner than allowed by the standards specified in the Municipal Code.

The project applicant has applied for a PD Permit to request deviations from Section 15-2015 of the Municipal Code, which specifies that lighting fixtures in commercial districts have a maximum height of 25 feet. Costco aims to achieve 2.5 foot-candles of light throughout the parking area to maximize safety within the parking lot. This level of lighting is intended to provide security and safety for drivers and pedestrians navigating the parking lot at night. The project would include light fixtures with a maximum height of approximately 36.5 feet instead of the allowed 25-foot-tall fixtures to reduce the number of lights needed to achieve the desired light levels within the parking field. The proposed 36.5-foot-tall light poles also allow a more diffuse distribution of light, reducing the difference in light levels in the areas between poles. The taller lighting also ensures that the area beneath the PG&E easement that runs directly through the parking field has adequate lighting. (No structures, including light poles, are allowed within this overhead easement.) Off-site glare and light spillover from parking lot light fixtures would be minimized by using less powerful lights on fixtures at the edge of the property.

## 2.3 PROJECT OBJECTIVES

The State CEQA Guidelines require that an EIR include a statement of objectives for the project and that the objectives include the underlying purpose of the project. These objectives help the lead agency determine the alternatives to evaluate in the EIR (see CEQA Guidelines Section 15124[b]) and gauge whether alternatives or mitigation measures are feasible. The following is a list of project objectives:

- Construct and operate a new membership-only Costco Commercial Center in northwest Fresno that serves the local community with a wide variety of goods and services from both nationally known businesses and regional and local businesses.
- Locate the new membership-only Costco Commercial Center in a location that is convenient for its members, the community, and employees to travel to for shopping and working.
- Locate the new membership-only Costco Commercial Center in an area serviced by adequate existing infrastructure, including roadways and utilities.
- Establish a facility of sufficient size to provide a state-of-the-art facility that integrates several services, including home and/or business delivery service, under one roof.
- Meet demand for automobile services, including gasoline, car wash, and tire center.
- Create a commercial use with architecture designed to facilitate integration with the overall design context for an area, including the surrounding community.
- Reduce energy consumption by incorporating sustainable design features and systems with enhanced energy efficiencies meeting State and federal requirements.
- Continue and increase big-box retail store sales tax revenues received by the City.
- Improve availability of integrated retail sales of goods and services in the northwest area of Fresno.
- Minimize circulation conflicts between automobiles and pedestrians for retail stores and gas stations.

## 2.4 DISCRETIONARY APPROVALS

A list of discretionary approvals, permits, and entitlements anticipated for the proposed project includes the approvals noted below. The following list identifies permits and other approval actions likely to be required from responsible agencies before implementation of the proposed project.

- State Water Resource Control Board: Coverage under the State General Stormwater Permit.
- Central Valley Regional Water Quality Control Board (RWQCB): National Pollutant Discharge Elimination System Permit and Wastewater Discharge Permit.
- San Joaquin Valley Air Pollution Control District (SJVAPCD): Permit to construct and permit to operate.
- Fresno Metropolitan Flood Control District (FMFCD): Plan and drainage report review.

The proposed project would also require the following entitlements from the City of Fresno:

- Amend the 2035 Fresno General Plan to change the planned land use designations for the project site from the Community Commercial to the General Commercial planned land use designation and reclassify a portion of West Herndon Avenue between North Riverside Drive and North Hayes Avenue from Expressway to Superarterial.
- Amend the Official Zoning Map of the City of Fresno to reclassify the project site from the CC/EA/UGM/cz (Community Commercial/Expressway Area Overlay/Urban Growth Management/conditions of zoning) zone district to the CG/UGM/cz (General Commercial/Urban Growth Management/conditions of zoning) zone district.

- Approve a Conditional Use Permit to construct a ±241,342 square-foot, warehouse retail building with a ±4,800 square-foot car wash; and an ±13,000 square-foot, 32-station fuel canopy.
- Approve an Alcoholic Beverage Control Conditional Use Permit to establish a Type 21 alcohol license that would allow the sale of beer, wine, and distilled spirits for consumption off the premises where sold.
- Approve a Planned Development Permit to modify parking lot development standards to allow for 36.5-foot-tall light fixtures rather than 25-foot light fixtures.
- Approve a Parcel Map for the subdivision of the existing parcel into two resultant parcels.
- Approve vacation of an existing public street right-of -way for North Arthur Avenue, between West Spruce Avenue and West Herndon Avenue.
- Approve a permit for construction noise.

# 3 ENVIRONMENTAL REVIEW PROCESS

In accordance with Section 15083 of the State CEQA Guidelines, the City has provided opportunities for individual members of the public, as well as organization and agency representatives, to consider the proposed actions and provide input and recommendations concerning the content of the EIR.

## 3.1 NOTICE OF PREPARATION

The City released a notice of preparation (NOP) for the EIR on October 22, 2021. The purpose of the NOP was to provide notification that an EIR was being prepared and to solicit input on the scope and content of the document. A virtual public meeting was held on November 2, 2021, at 6:00 p.m. The scoping period for the project ended on November 22, 2021. The NOP and comments received in response to the NOP are included in Appendix A of the Draft EIR. Comments were received regarding traffic congestion, safety, and access; air quality and the proximity of the gas station to nearby sensitive receptors; access to existing recreational trails; and lighting. The comments received on the NOP and at the scoping meeting are addressed, as applicable, in each technical section of the Draft EIR.

## 3.2 DRAFT ENVIRONMENTAL IMPACT REPORT

On July 11, 2023, the City released the Draft EIR for public review and comment. The Draft EIR was submitted to the State Clearinghouse for distribution to reviewing agencies; posted on the City's website (https://www.fresno.gov/planning/plans-projects-under-review/#tab-14); and was made available at the Planning and Development Department (2600 Fresno Street, Room 3043). The document was also available for review at the Teague Branch Library (4718 N Polk Avenue). A notice of availability of the Draft EIR was published in the Fresno Bee.

As a result of these notification efforts, written and verbal comments were received from two state agencies (California Department of Fish and Wildlife [CDFW] and California Department of Transportation), one local agency (SJVAPCD), an organization representing the project applicant, and individuals. The Final EIR includes comments received on the Draft EIR; responses to these comments; and revisions to the Draft EIR, as necessary, in response to these comments or to amplify or clarify material in the Draft EIR.

# 4 GENERAL CEQA FINDINGS

## 4.1 CITY COUNCIL INDEPENDENT JUDGMENT

The City Council has exercised independent judgment in accordance with PRC Section 21082.1(c)(3) in retaining an environmental consultant for the preparation of the EIR, as well as reviewing, analyzing, and revising material prepared by the consultant. Having received, reviewed, and considered the information in the EIR, as well as all other information in the record, the City Council hereby makes Findings pursuant to and in accordance with Sections 21081, 21081.5, and 21081.6 of the PRC.

## 4.2 MITIGATION MONITORING AND REPORTING PROGRAM

PRC Section 21081.6(a)(1) requires lead agencies to "adopt a reporting and mitigation monitoring program for the changes to the project which it has adopted or made a condition of project approval in order to mitigate or avoid significant effects on the environment." The mitigation monitoring and reporting program (MMRP) is adopted in conjunction with certification of the EIR and adoption of these Findings of Fact. The City will use the MMRP to track compliance with project mitigation measures and the MMRP will remain available for public review during the compliance period. Based on the entire record before the City Council and having considered the significant impacts of the project, the City Council hereby determines that all feasible mitigation within the responsibility and jurisdiction of the City has been adopted to reduce or avoid the potentially significant impacts identified in the EIR.

Furthermore, City finds that any inconsistency in the language of the mitigation measures in the EIR, in the MMRP, and in these Findings is inadvertent. Because measures have been revised over time, it is possible that such revisions or clarifications have been made in one document, but not another. In the event of such inconsistency, the language of a measure in one document shall be applied in a manner that harmonizes the measure with the corresponding measure in other documents, such that the most stringent version of the measure shall apply.

## 4.3 NATURE AND LEGAL EFFECT OF FINDINGS

These Findings constitute the City's evidentiary and policy bases for its decision to approve the project in a manner consistent with the requirements of CEQA. To the extent that these Findings conclude that various mitigation measures outlined in the EIR are feasible and have not been modified, superseded or withdrawn, the City hereby binds itself to implement these measures. These Findings, in other words, are not merely informational, but rather constitute a binding set of obligations that will come into effect when the City adopts a resolution approving the project.

Any Findings made by the City Council shall be deemed made, regardless of where it appears in this document. All of the language included in this document constitutes Findings by the City Council, whether or not any particular sentence or clause includes a statement to that effect. The City Council intends that these Findings be considered as an integrated whole and that any finding required or committed to be made by the City Council with respect to any particular subject matter of the EIR shall be deemed made if it appears in any portion of these Findings.

## 4.4 RELIANCE ON RECORD

In accordance with PRC Section 21167.6(e), the record of proceedings for the City's decision on the project includes the following documents:

- The NOP for the project and all other public notices issued by the City in conjunction with the project;
- All comments submitted by agencies or members of the public during the comment period on the NOP;

- The Draft EIR for the project and all appendices;
- The Final EIR for the project, including comments received on the Draft EIR, and responses to those comments and appendices;
- Documents cited or referenced in the Draft EIR and Final EIR;
- The MMRP for the project;
- All reports, studies, memoranda, maps, staff reports, or other planning documents relating to the project prepared by the City, consultants to the City, or responsible or trustee agencies with respect to the City's compliance with the requirements of CEQA and with respect to the City's action on the project;
- All documents submitted to the City by other public agencies or members of the public in connection with the project;
- Any minutes and/or verbatim transcripts of all information sessions, public meetings, and public hearings held by the City in connection with the project;
- Any and all resolutions adopted by the City regarding the project, and all staff reports, analyses, and summaries related to the adoption of those resolutions;
- Matters of common knowledge to the City, including, but not limited to federal, state, and local laws and regulations;
- Any documents expressly cited in these findings, in addition to those cited above; and
- Any other materials required for the record of proceedings by PRC Section 21167.6(e).

The custodian of the documents and other materials that constitute the record of the proceedings upon which the City's decisions are based is Jose Valenzuela, or his designee. Such documents and other materials are located at the City of Fresno Planning and Development Department, 2600 Fresno Street, Fresno, CA 93721.

## 4.5 FINDINGS REGARDING RECIRCULATION OF THE DRAFT EIR

The City Council adopts the following Findings with respect to whether to recirculate the Draft EIR. Under Section 15088.5 of the State CEQA Guidelines, recirculation of an EIR is required when "significant new information" is added to the EIR after public notice is given of the availability of the Draft EIR for public review but prior to certification of the Final EIR. The term "information" can include changes in the project or environmental setting, as well as additional data or other information. New information added to an EIR is not "significant" unless the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect (including a feasible project alternative) that the project's proponents have declined to implement. Pursuant to State CEQA Guidelines Section 15088.5(a) "Significant new information" requiring recirculation includes, for example, a disclosure showing that:

(1) A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented.

(2) A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance.

(3) A feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the significant environmental impacts of the project, but the project's proponents decline to adopt it.

(4) The Draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded.

Recirculation is not required where the new information added to the EIR merely clarifies or amplifies or makes insignificant modifications in an adequate EIR.

The City Council recognizes that the Final EIR contains additions, clarifications, modifications, and other changes. (See Final EIR, Chapter 3, "Revisions to the Draft EIR.") As discussed in the Final EIR, none of the information added to the Draft EIR altered the significance conclusions. Rather, the new information refined, amplified, and clarified the information provided in the Draft EIR. None of the revisions or updates to the Draft EIR's analyses represents "significant new information" as that term is defined by the State CEQA Guidelines, Section 15088.5(a).

The City Council finds that recirculation of the Draft EIR is not required: (1) because recirculation is not required where the new information added to the EIR merely clarifies, amplifies, or makes insignificant modifications in an adequate EIR; and (2) because no "substantial adverse" impact would result from any of the revisions to the portions of the Draft EIR that were not recirculated (State CEQA Guidelines Section 15088.5[e]).

# 5 CERTIFICATION OF THE FINAL ENVIRONMENTAL IMPACT REPORT

The City Council certifies that the Final EIR has been completed in compliance with CEQA and the State CEQA Guidelines, that the EIR was presented to the City Council, and that the City Council reviewed and considered the information contained therein before approving the proposed project, and that the EIR reflects the independent judgment and analysis of the City Council (State CEQA Guidelines Section 15090).

# 6 FINDING OF FACT

PRC Section 21002 provides 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[.]" The same statute provides that the procedures required by CEQA "are intended to assist public agencies in systematically identifying both the significant effects of projects and the feasible alternatives or feasible mitigation measures which will avoid or substantially lessen such significant effects." Section 21002 goes on to provide that "in the event [that] specific economic, social, or other conditions make infeasible such project alternatives or such mitigation measures, individual projects may be approved in spite of one or more significant effects thereof."

For each significant environmental effect identified in an EIR for a project, the approving agency must issue a written finding reaching one or more of three permissible conclusions. The first such finding is that "changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the final EIR." The second permissible finding is that "such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding, and such changes have been adopted by such other agency or can and should be adopted by such other agency." The third potential conclusion is that "specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or project alternatives identified in the final EIR." (State CEQA Guidelines Section 15091.)

PRC Section 21061.1 defines "feasible" to mean "capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social, legal, and technological factors." The State CEQA Guidelines Section 15364 adds another factor: "legal" considerations. (See Citizens of Goleta Valley v. Bd. of Supervisors (1990) 52 Cal.3d 553, 565.) The concept of "feasibility" also encompasses the question of whether a particular alternative or mitigation measure promotes the underlying goals and objectives of a project. (City of Del Mar v. City of San Diego (1982) 133 Cal.App.3d 410, 417.) Moreover, "feasibility" under CEQA encompasses 'desirability' to the extent that desirability is based on a reasonable balancing of the relevant economic,

environmental, social, legal, and technological factors." (Ibid.; see also Sequoyah Hills Homeowners Assn. v. City of Oakland (1993) 23 Cal.App.4th 704, 715; California Native Plant Society v. City of Santa Cruz (2009) 177 Cal.App.4th 957, 1001.)

With respect to a project for which significant impacts are not avoided or substantially lessened, a public agency, after adopting proper Findings, may nevertheless approve the project if the agency first adopts a statement of overriding considerations setting forth the specific reasons why the agency finds that the project's "benefits" render "acceptable" its "unavoidable adverse environmental effects." (State CEQA Guidelines Sections 15093, 15043[b]; see also PRC Section 21081[b].) Those impacts that are not reduced to less than significant levels are identified and overridden due to specific project benefits identified specifically in a Statement of Overriding Considerations (see Section 12, below).

## 6.1 SIGNIFICANT EFFECTS AND MITIGATION MEASURES

Chapter 3, "Environmental Impacts and Mitigation Measures," of the Draft EIR describes the potential impacts of the project in 14 resource areas, and recommends mitigation measures to reduce impacts, to the extent feasible. Chapter 4, "Cumulative Impacts," of the Draft EIR determines whether the incremental effects of this project are significant when viewed in connection with the effects of past projects, other current projects, and probable future projects. After implementation of the recommended mitigation measures, most of the impacts associated with the project would be reduced to less-than-significant levels. For some impacts, there are no feasible mitigation measures or feasible alternatives that would reduce the impact to a less-than-significant level (see Section 5.2, "Significant and Unavoidable Impacts," of the Draft EIR.)

The City Council's Findings with respect to the project's significant and potentially significant effects and mitigation measures are set forth in Sections 9 and 10, below. These sections do not attempt to describe the full analysis of each environmental impact contained in the EIR. Instead, the sections provide a summary description of each impact, describe the applicable mitigation measures identified in the EIR and adopted by the City, and state the City Council's Findings on the significance of each impact after imposition of the adopted mitigation measures. A full explanation of these environmental findings and conclusions can be found in the Draft EIR. In making these Findings, the City Council ratifies, adopts, and incorporates into these Findings the analysis and explanation in the Draft EIR and Final EIR, and ratifies, adopts, and incorporates into these Findings the determinations and conclusions of the Draft EIR and Final EIR relating to environmental impacts and mitigation measures, except to the extent any such determinations and conclusions are specifically and expressly modified by these Findings.

# 7 ENVIRONMENTAL EFFECTS OF THE PROJECT THAT ARE FOUND TO BE LESS THAN SIGNIFICANT

The City Council finds that, based upon substantial evidence in the record, including information in the EIR, the following impacts have been determined be less than significant and no mitigation is required pursuant to PRC Section 21081(a) and CEQA Guidelines Section 15091(a).

# 7.1 AESTHETICS

## Impact 3.1-1: Substantially Degrade the Existing Visual Character or Quality of Public Views of the Site and Its Surroundings or Conflict with Zoning and Other Regulations Governing Scenic Quality

Implementation of the project would alter views by adding built-environment elements on a vacant parcel. However, the existing visual quality of the parcel is low. The project elements proposed would not change the suburban visual character of the general area, as elements of the project's design (such as building height, color, massing, architectural detailing, screening vegetation and landscaping, and setback requirements) would be consistent with the visual character of the surrounding environment. (Draft EIR pp. 3.1-6 to 3.1-8)

### FINDING

The City Council finds, based upon substantial evidence in the record, that the potential impacts of the Costco Commercial Center Project would be less than significant. No mitigation measures are required.

## Impact 3.1-2: Create a New Source of Substantial Light or Glare Which Would Adversely Affect Nighttime Views in the Area

The project would introduce new sources of light onto the existing, vacant project site. Light spillover onto adjacent land uses would be reduced by using less powerful lights on fixtures at the edge of a property. Reflective, glare causing materials would not be used. All fixtures would be downcast and would not exceed the 0.5-foot-candle standard for light spillover onto residential areas. (Draft EIR p. 3.1-9)

### FINDING

The City Council finds, based upon substantial evidence in the record, that the potential impacts of the Costco Commercial Center Project would be less than significant. No mitigation measures are required.

## Impact 4-1: Cumulative Aesthetics Impacts

The project would contribute regional changes to aesthetics. The effects of these changes are highly subjective and tend to be localized. The combined effects of other projects in the cumulative impact area would not be cumulatively significant and the project would not have a considerable contribution such that a new cumulatively significant impact would occur. (Draft EIR p. 4-7)

### FINDING

The City Council finds, based upon substantial evidence in the record, that the potential impacts of the Costco Commercial Center Project would be less than significant. No mitigation measures are required.

# 7.2 AGRICULTURAL AND FORESTRY RESOURCES

## Impact 3.2-1: Involve Other Changes in the Existing Environment, Which, Due to Their Location or Nature, Could Result in Conversion of Farmland to Non-Agricultural Use

The project would result in the development of a parcel that was formerly used for agriculture and is recognized by the Department of Conservation as Farmland of Local Importance. The project site is no longer used for agriculture and is designated for commercial land use per the City of Fresno General Plan. Similarly, surrounding parcels are designated, and in some cases developed as, residential and commercial uses. The project would not involve changes to the existing environment that could result in conversion of farmland to non-agricultural use. (Draft EIR p. 3.2-5)

### FINDING

The City Council finds, based upon substantial evidence in the record, that the potential impacts of the Costco Commercial Center Project would be less than significant. No mitigation measures are required.

## Impact 4-2: Cumulative Agriculture and Forestry Resources Impacts

Although portions of the city, including the project site, were historically used for agriculture, the City has planned for urbanization of the incorporated city through its general plan. The City of Fresno General Plan Master Environmental Impact Report identified that development according to the of land uses in the General Plan would result in the loss of up to 15,903 acres of Farmland Mapping and Monitoring Program-designated farmland (City of Fresno 2014: 5.2-12).

Although the project site is not zoned for agriculture and is not under Williamson Act contract, it is designated Farmland of Local Importance. Development of the project site would result in permanent conversion of this land. Farmland of Local Importance is not a designation of concern under CEQA. Therefore, although there is an existing, adverse cumulative condition related to the loss of Farmland in the city of Fresno the project would not substantially contribute to the impact. (Draft EIR pp. 4-7 to 4-8)

### FINDING

The City Council finds, based upon substantial evidence in the record, that the potential impacts of the Costco Commercial Center Project would be less than significant. No mitigation measures are required.

# 7.3 AIR QUALITY

## Impact 3.3-1: Generate Short-Term Construction-Related Emissions of ROG, $NO_X$, CO, $SO_X$, $PM_{10}$, and $PM_{2.5}$

The project would not generate construction emissions of criteria air pollutants and ozone precursors exceeding SJVAPCD's annual mass emissions thresholds of significance or daily screening criteria. These thresholds are inherently tied to long-term regional air quality planning (i.e., SJVAPCD's air quality management plans) which demonstrates that the project would not conflict with the applicable air quality plans. (Draft EIR pp. 3.3-19 to 3.3-20)

## FINDING

The City Council finds, based upon substantial evidence in the record, that the potential impacts of the Costco Commercial Center Project would be less than significant. No mitigation measures are required.

# Impact 3.3-2: Generate Long-Term Operational Emissions of ROG, $NO_X$, CO, $SO_X$, $PM_{10}$, and $PM_{2.5}$

The project would not generate operational emissions of criteria air pollutants and ozone precursors exceeding SJVAPCD's annual mass emissions thresholds of significance or daily screening criteria for permitted and non-permitted sources following compliance with SJVACPD's Rule 9510 (ISR) for this land use type. (Draft EIR pp. 3.3-20 to 3.3-21)

## FINDING

The City Council finds, based upon substantial evidence in the record, that the potential impacts of the Costco Commercial Center Project would be less than significant. No mitigation measures are required.

# Impact 3.3-3: Expose Receptors to TAC Concentrations Adversely Affecting a Substantial Number of People

Based on the health risk assessment prepared for the project, construction and operation of the project would not produce significant diesel particulate matter or other toxic air contaminants (TACs) such that SJVAPCD's thresholds for TAC cancer risk exposure of 20 in 1 million or an acute or chronic Hazard Index of 1 for the maximally exposed individual for non-carcinogens would be exceeded. Using these numerical thresholds established by SJVAPCD, the project would not generate substantial emissions of TACs causing an adverse health impact from TAC expose. (Draft EIR pp. 3.3-22 to 3.3-23)

## FINDING

The City Council finds, based upon substantial evidence in the record, that the potential impacts of the Costco Commercial Center Project would be less than significant. No mitigation measures are required.

# Impact 3.3-4: Expose Receptors to Substantial CO Concentrations

Buildout of the project would not contribute to localized concentrations of mobile-source carbon dioxide that would exceed an applicable ambient air quality standard. (Draft EIR pp. 3.3-23 to 3.3-24)

## FINDING

The City Council finds, based upon substantial evidence in the record, that the potential impacts of the Costco Commercial Center Project would be less than significant. No mitigation measures are required.

# Impact 3.3-5: Generate Other Emissions (Such as Those Leading to Odors) Adversely Affecting a Substantial Number of People

Buildout of the project would not introduce an odor source identified by SJVAPCD that could result in an adverse odor impact. (Draft EIR p. 3.3-25)

### FINDING

The City Council finds, based upon substantial evidence in the record, that the potential impacts of the Costco Commercial Center Project would be less than significant. No mitigation measures are required.

## Impact 4-3: Cumulative Air Quality Impacts

There is a cumulative impact related to air quality in the city of Fresno. However, the project's contribution to this cumulatively significant air quality impact would not be cumulatively considerable. In accordance with CEQA Guidelines Section 15064, subdivision (h)(3), a lead agency may determine that a project's incremental contribution to a cumulative effect is not cumulatively considerable if the project complies with the requirements in a previously approved plan or mitigation program. All air quality pollutants would be below established thresholds. This level of emissions indicates that the project would not conflict with long-term regional air quality planning in the San Joaquin Valley Air Basin. Additionally, as long-term regional air quality planning is directly tied to attainment of the national and state air quality standards, the project would not contribute substantially to adverse health outcomes associated with cumulative air quality impairment. (Draft EIR p. 4-8)

### FINDING

The City Council finds, based upon substantial evidence in the record, that the potential impacts of the Costco Commercial Center Project would be less than significant. No mitigation measures are required.

# 7.4 ARCHAEOLOGICAL, HISTORICAL, AND TRIBAL CULTURAL RESOURCES

## Impact 3.4-3: Disturb Human Remains

Based on documentary research, no evidence suggests that any prehistoric or historic-period marked or un-marked human interments are present within or in the immediate vicinity of the project site. However, ground-disturbing preconstruction and construction activities could uncover previously unknown human remains. Compliance with California Health and Safety Code Section 7050.5 and PRC Section 5097 would make this impact less than significant. (Draft EIR p. 3.4-14 to 3.4-15)

### FINDING

The City Council finds, based upon substantial evidence in the record, that the potential impacts of the Costco Commercial Center Project would be less than significant. No mitigation measures are required.

## Impact 4-4: Cumulative Archaeological, Historical, and Tribal Cultural Resources Impacts

The project could contribute to cumulative impacts associated with damage or loss of cultural resources. Implementation of Mitigation Measures 3.4-1a and 3.4-1b would reduce the project's individual impact to a less-than-significant level by requiring that a worker environmental awareness program be prepared and provided to all construction personnel and supervisors who will have the potential to encounter and alter archaeological resources, requiring construction to halt if potential archaeological resources are discovered, coordination with Native American groups (if applicable), implementation of preservation options (including data recovery, mapping, capping, or avoidance), and proper curation if significant artifacts are recovered. Because the project's individual impact would be

reduced to a less-than-significant level, the project's contribution to this cumulatively significant impact would not be cumulatively considerable. (Draft EIR p. 4-9)

### FINDING

The City Council finds, based upon substantial evidence in the record, that the potential impacts of the Costco Commercial Center Project would be less than significant. No additional mitigation measures are required.

## 7.5 BIOLOGICAL RESOURCES

### Impact 4-5: Cumulative Biological Resources Impacts

The project would contribute to cumulative biological resources impacts associated with construction and operation of land uses in the cumulative impact area. Mitigation Measures 3.5-1a and 3.5-1b would prevent potential adverse effects on these species associated with the individual project. Because implementation of mitigation measures would reduce the project's individual impact to a less-than-significant level, the project's contribution to the cumulatively significant impact would be less than cumulatively considerable. (Draft EIR pp. 4-9 to 4-10)

### FINDING

The City Council finds, based upon substantial evidence in the record, that the potential impacts of the Costco Commercial Center Project would be less than significant. No additional mitigation measures are required.

## 7.6 ENERGY

### Impact 3.6-1: Result in a Potentially Significant Environmental Impact Due to the Wasteful, Inefficient, or Unnecessary Consumption of Energy Resources, During Project Construction or Operation

The project would not use energy for construction that would be considered wasteful or unnecessary, as that energy expenditure would facilitate operation of the project and achievement of project goals. The project does not include any construction activity beyond what is needed to provide a functional facility. Construction of the project would adhere to best management practices (BMPs) for construction (e.g., restrict idling time to 5 minutes or less). Moreover, the project would utilize Tier 3 construction equipment or construction equipment exceeding 50 horsepower. The project would introduce new electricity and natural gas consumption relative to baseline conditions; however, the project would be enrolled in the PG&E's Solar Choice Program to procure 100 percent of its electricity from solar resources. The project would also be served by existing infrastructure capable of meeting the project's operational energy needs. During operation, energy would not be used in a wasteful or inefficient manner. (Draft EIR pp. 3.6-7 to 3.6-9)

### FINDING

The City Council finds, based upon substantial evidence in the record, that the potential impacts of the Costco Commercial Center Project would be less than significant. No mitigation measures are required.

## Impact 3.6-2: Conflict with or Obstruct Implementation of Energy Measures of a State or Local Plan for Renewable Energy or Energy Efficiency

The project would be consistent with the relevant energy measures from the City of Fresno's Greenhouse Gas Reduction Plan (GHGRP) that pertain to nonresidential development. Because the project would incorporate relevant measures as project design features, such as a commitment to PG&E's Solar Choice Program, and would incorporate energy-reducing measures from the GHGRP, the project would not conflict with or obstruct implementation of the City of Fresno's GHGRP. (Draft EIR p. 3.6-9)

### FINDING

The City Council finds, based upon substantial evidence in the record, that the potential impacts of the Costco Commercial Center Project would be less than significant. No mitigation measures are required.

## Impact 4-6: Cumulative Energy Impacts

Cumulative development would result in increased energy demand and consumption from increased construction activities, vehicle trips, and electrical and natural gas consumption. The cumulative effects of related projects are not significant and the project would not have a considerable contribution such that a new cumulatively significant impact would occur. (Draft EIR pp. 4-10)

### FINDING

The City Council finds, based upon substantial evidence in the record, that the potential impacts of the Costco Commercial Center Project would be less than significant. No mitigation measures are required.

# 7.7 GREENHOUSE GAS EMISSIONS AND CLIMATE CHANGE

## Impact 3.7-1: Generate GHG Emissions That Would Conflict with the City's Greenhouse Gas Reduction Plan

The project would incorporate various measures similar to GHG reduction measures in the GHGRP as project design features. The project's emissions would also be reduced by regulatory mechanisms such as the Advanced Clean Cars II Program and the Advanced Clean Trucks regulation. To demonstrate compliance with the GHGRP, the project would be required to reduce its emissions by 1.5 percent or 381 metric tons of carbon dioxide equivalent ($MTCO_2e$) in 2030 and 11.6 percent or 2,711 $MTCO_2e$ by 2035. Through the incorporation of on-site reduction measures derived from the GHGRP and reductions realized from these aforementioned programs, the project would reduce its emissions by 3,140 and 6,719 $MTCO_2e$ in 2030 and 2035, respectively, as compared to levels of emissions without accounting for the project features and regulatory compliance. This level of reduction exceeds the GHGRP standards. Therefore, the project would be consistent with the GHGRP. (Draft EIR pp. 3.7-11 to 3.7-13)

### FINDING

The City Council finds, based upon substantial evidence in the record, that the potential impacts of the Costco Commercial Center Project would be less than significant. No mitigation measures are required.

### 7.7.1 Impact 4-7: Cumulative Greenhouse Gas Emissions and Climate Change Impacts

There is an existing substantial adverse impact related to GHG emissions and global climate change. Based on consistency with the GHGRP, which itself is consistent with the state's targets established to address the existing cumulative condition of global climate change, the project would not have a considerable contribution to the cumulative condition. (Draft EIR p. 4-11)

#### FINDING

The City Council finds, based upon substantial evidence in the record, that the potential impacts of the Costco Commercial Center Project would be less than significant. No mitigation measures are required.

## 7.8 HAZARDS AND HAZARDOUS MATERIALS

### Impact 3.8-1: Create a Significant Hazard through Routine Transport, Use, or Disposal of Hazardous Materials

Project construction and operation would involve the routine transport, use, and disposal of hazardous materials. Potential impacts would be addressed through compliance with applicable regulations that would reduce impacts associated with the use, transport, storage, and sale of hazardous materials, including measures taken to address the safety of underground storage tanks and the handling of hazardous materials in accordance with the Hazardous Materials Business Emergency/Contingency Plan and the local Certified Unified Program Agency. (Draft EIR pp. 3.8-7 to 3.8-8)

#### FINDING

The City Council finds, based upon substantial evidence in the record, that the potential impacts of the Costco Commercial Center Project would be less than significant. No mitigation measures are required.

### Impact 3.8-2: Create a Significant Hazard through Reasonably Foreseeable Upset and Accident Conditions Involving the Release of Hazardous Materials into the Environment or be Located on a Site which is Included on a List of Hazardous Materials Sites Compiled Pursuant to Government Code Section 65962.5 and would Create a Significant Hazard to the Public or the Environment

The potential for past use of the project site to result in substantial hazard has been evaluated, including soil sampling as part of a Phase II Environmental Site Assessment. Operation of the project, which would involve the use, storage, and sale of potentially hazardous materials, would be subject to regulations designed to reduce the potential for the project to create hazardous conditions through a reasonably foreseeable upset or accident condition. There is no evidence of a substantial hazard to the public or the environment. Implementation of the project would not result create a significant hazard due to release of chemicals associated with past agricultural use of the site, location on a site that is on a list of known hazardous materials sites, or due to operation of the project. (Draft EIR pp. 3.8-9 to 3.8-10)

## FINDING

The City Council finds, based upon substantial evidence in the record, that the potential impacts of the Costco Commercial Center Project would be less than significant. No mitigation measures are required.

# Impact 3.8-3: Emit Hazardous Emissions or Handle Hazardous or Acutely Hazardous Materials, Substances, or Waste within 0.25 Mile of an Existing or Proposed School

Compliance with all relevant regulations for the handling and transport of hazardous materials would reduce the potential for the generation of hazardous waste typical of construction activities. Additionally, the potential for operation of the project to result in hazardous effects on schools would be limited because the gas station would be designed to minimize potential for accidental releases of fuel into the environment. (Draft EIR pp. 3.8-10 to 3.8-11)

## FINDING

The City Council finds, based upon substantial evidence in the record, that the potential impacts of the Costco Commercial Center Project would be less than significant. No mitigation measures are required.

# Impact 3.8-4: Impair Implementation of or Physically Interfere with the Implementation of an Adopted Emergency Response Plan or Emergency Evacuation Plan

The Fresno County Multi-Hazard Mitigation Plan does not identify formal evacuation routes. Compliance with the conditions of the Street Work and Traffic Control Permit during any potential road closures, applicable General Plan policies, and review of the site plan by the City Fire Department would result in a less-than-significant impact on implementation of an adopted emergency response plan or emergency evacuation plan. (Draft EIR p. 3.8-11)

## FINDING

The City Council finds, based upon substantial evidence in the record, that the potential impacts of the Costco Commercial Center Project would be less than significant. No mitigation measures are required.

# Impact 3.8-5: Expose People or Structures, Either Directly or Indirectly, to a Significant Risk of Loss, Injury, or Death Involving Wildland Fires

The project site is not located within a designated urban-wildland interface area nor is it near designated State Responsibility Areas. Existing development and irrigated agricultural land surround the project site, and the likelihood for wildland fire in the area is low. The project design would comply with existing regulations and would ensure the Costco facility and associated tire center, gas station, and drive-through car wash meet the standards for emergency access, fuel modification, setback, signage, and water supply, which help prevent damage to structures or people by reducing wildfire hazards. (Draft EIR pp. 3.8-11 to 3.8-12)

## FINDING

The City Council finds, based upon substantial evidence in the record, that the potential impacts of the Costco Commercial Center Project would be less than significant. No mitigation measures are required.

## Impact 4-8: Cumulative Hazards and Hazardous Materials Impacts

Hazardous materials and safety issues generally occur independently of one another and are related to site-specific and project-specific characteristics and conditions. Compliance with all applicable federal, state, and local regulations related to hazards and hazardous materials on a project-by-project basis would ensure that site-specific impacts are appropriately addressed and cannot combine with site-specific impacts from other project sites. The cumulative effects of related projects are not significant, and the project would not have a considerable contribution such that a new cumulatively significant impact would occur. (Draft EIR pp. 4-11 to 4-12)

### FINDING

The City Council finds, based upon substantial evidence in the record, that the potential impacts of the Costco Commercial Center Project would be less than significant. No mitigation measures are required.

# 7.9 HYDROLOGY AND WATER QUALITY

## Impact 3.9-1: Violate Water Quality Standards or Waste Discharge Requirements or Otherwise Degrade Water Quality

Project construction activities such as grading, excavation, and trenching could result in erosion and sedimentation, and discharge of other nonpoint source pollutants. In addition, the project would include fuel storage and dispersal, tire maintenance, and a car wash facility that could generate stormwater pollutants including oils, lubricants, and heavy metals. Regulations apply to the project that would reduce potentially significant impacts, including the National Pollutant Discharge Elimination System Permit Program, underground storage tank regulations contained in CCR, Title 23, Water, Division 3, Chapter 16 (underground storage tank regulations), Central Valley RWQCB General Permit for Stormwater Discharges from municipal separate storm sewer systems (Order R5-2016-0040), and FMFCD's Storm Drainage and Flood Control Master Plan. Because compliance with these regulations and BMPs would be incorporated into the project, there would not be a violation of water quality standards or waste discharge requirement or interference with implementation of a water quality control plan. (Draft EIR pp. 3.9-8 to 3.9-9)

### FINDING

The City Council finds, based upon substantial evidence in the record, that the potential impacts of the Costco Commercial Center Project would be less than significant. No mitigation measures are required.

## Impact 3.9-2: Substantially Decrease Groundwater Supplies; Interfere with Groundwater Recharge, Such That the Project May Impede Sustainable Groundwater Management of the Basin; or Conflict with or Obstruct Implementation of a Water Quality Control Plan or Sustainable Groundwater Management Plan

The project would receive water from the City of Fresno Department of Public Utilities, which relies on groundwater and surface water supplies. The North Kings Groundwater Sustainability Agency (GSA) is projected to reach sustainability by 2040 if groundwater flows from within the North Kings GSA plan area to neighboring GSAs and basins are reduced and projects are developed to address present and future projected groundwater conditions. The project would not decrease groundwater supplies or interfere with groundwater recharge such that implementation of a

sustainable groundwater management would be impeded, nor would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan. (Draft EIR p. 3.9-10)

## FINDING

The City Council finds, based upon substantial evidence in the record, that the potential impacts of the Costco Commercial Center Project would be less than significant. No mitigation measures are required.

# Impact 3.9-3: Substantially Alter the Existing Drainage Pattern of the Site or Area in a Manner That Would Result in Substantial Erosion or Siltation, Substantially Increase in Surface the Rate or Amount of Surface Runoff in a Manner That Would Result in Flooding or Exceedance of the Capacity of Existing or Planned Stormwater Drainage Systems, or Impede or Redirect Flood Flows

The applicant would construct utility improvements within the site to service the proposed uses and connect to available utilities adjacent to the project site. Stormwater from the site would be directed to existing FMFCD drainage facilities in North Riverside Drive, West Spruce Avenue, and West Herndon Avenue, located within the EH local stormwater drainage area. In addition, the project would be required to comply with the City of Fresno grading plan check process and National Pollutant Discharge Elimination System Construction General Permit Region-wide municipal separate storm sewer system. Compliance with the grading plan check process requires that all new development drains properly and is routed to the appropriate location. Additionally, these regulations would result in appropriate handling of stormwater on site to reduce potential for substantial increased runoff and minimize potential for downstream flooding. Participation in the region-wide municipal separate storm sewer system permit would reduce water quality impacts to surface and groundwater by ensuring that discharged water meets the water quality standards and goals established in the Central Valley RWQCB's Basin Plan through the implementation of BMPs described above. The runoff generated by the project is not anticipated to exceed the capacity of existing and planned stormwater drainage systems. (Draft EIR p. 3.9-11)

## FINDING

The City Council finds, based upon substantial evidence in the record, that the potential impacts of the Costco Commercial Center Project would be less than significant. No mitigation measures are required.

# Impact 4-9: Cumulative Hydrology and Water Quality Impacts

The effects of buildout of the project on surface water quality, groundwater quality and quantity, alteration of drainage patterns, and flood hazards would be addressed though compliance with existing regulations. Development associated with anticipated projects in the cumulative impact area would be subject to similar state and local regulations. The combined effects of other projects in the cumulative impact area would not be cumulatively significant and the project would not have a considerable contribution such that a new cumulatively significant impact would occur. (Draft EIR p. 4-12)

## FINDING

The City Council finds, based upon substantial evidence in the record, that the potential impacts of the Costco Commercial Center Project would be less than significant. No mitigation measures are required.

# 7.10 LAND USE AND PLANNING

## Impact 3.10-1: Cause a Significant Environmental Impact Due to a Conflict with Relevant Plans, Policies, and Zoning Adopted for the Purpose of Avoiding or Mitigating an Environmental Effect

The proposed project would require a general plan amendment (GPA), rezone, and conditional use permit (CUP). Requests for discretionary permits require that the project be evaluated for compliance and consistency with a variety of policy and regulatory programs adopted to avoid or reduce the severity of potential environmental effects. The project would not conflict with City policies adopted for the purposes of avoiding or mitigating an environmental effect. (Draft EIR pp. 3.10-5 to 3.10-7)

### FINDING

The City Council finds, based upon substantial evidence in the record, that the potential impacts of the Costco Commercial Center Project would be less than significant. No mitigation measures are required.

## Impact 4-10: Cumulative Land Use and Planning Impacts

Land use and planning impacts would occur where there would be physical division of established communities or inconsistency land use plans and regulations adopted to avoid or mitigate environmental effects. There is not a significant cumulative impact as a result of community division or development of projects that do not adhere to adopted plans and regulations. The cumulative effects of related projects are not significant and the project would not have a considerable contribution such that a new cumulatively significant impact would occur. (Draft EIR p. 4-13)

### FINDING

The City Council finds, based upon substantial evidence in the record, that the potential impacts of the Costco Commercial Center Project would be less than significant. No mitigation measures are required.

# 7.11 NOISE

## Impact 3.11-2: Generate Excessive Groundborne Vibration or Groundborne Noise Levels

Construction activity associated with the proposed project would generate short-term increases in vibration near sensitive receptors in the vicinity of the project site. Based on the distance between the equipment anticipated to be used during construction and the location of nearby sensitive receptors, vibration levels would not exceed applicable state and federal thresholds with respect to structural damage and human annoyance. Additionally, City of Fresno Municipal Code Section 15-2507 exempts construction activity from vibration standards. (Draft EIR pp. 3.11-20 to 3.11-21)

### FINDING

The City Council finds, based upon substantial evidence in the record, that the potential impacts of the Costco Commercial Center Project would be less than significant. No mitigation measures are required.

## Impact 3.11-4: Generate a Substantial Permanent Increase in Ambient Noise Levels in the Vicinity of the Project due to Traffic Noise Levels in Excess of Standards Established in the Local General Plan or Noise Ordinance, or Applicable Standards of Other Agencies

The proposed project is expected to increase traffic along the surrounding roadway network and, thus, increase traffic noise in the vicinity of the project site. Project-generated traffic noise would not result in an exceedance of the City's interior or exterior standard at any sensitive receptors (residences) along North Riverside Drive. Additionally, although existing noise levels on West Herndon Avenue exceed the City's exterior noise standard of 65 decibels (dB) at day-night level ($L_{dn}$)/ Community Noise Equivalent Level (CNEL) for nearby residential uses, project-generated traffic would not result in an exceedance of interior noise standards (i.e., 45 $L_{dn}$/CNEL) or a substantial increase (i.e., greater than 3 dB) in transportation noise. (Draft EIR pp. 3.11-26 to 3.11-27)

### FINDING

The City Council finds, based upon substantial evidence in the record, that the potential impacts of the Costco Commercial Center Project would be less than significant. No mitigation measures are required.

## Impact 4-11: Cumulative Noise and Vibration Impacts

The ambient noise along West Herndon Avenue is influenced by roadway noise that exceeds the City's standards. The project's contribution to this cumulatively significant noise impact would be less than cumulatively considerable. Although the existing noise levels along West Herndon Avenue are above the City's noise standard, the traffic noise generated by the project would not result in a substantial increase. The 1 dB increase in traffic noise would be imperceptible and would not be a cumulatively considerable contribution to ambient noise on West Herndon Avenue in the cumulative condition. Although there is an existing, adverse cumulative condition associated with roadway noise along West Herndon Avenue, the project would not contribute significantly to this condition. The project would also result in noise that exceeds the City's standard due to increased traffic along North Riverside Drive. This impact would be addressed through implementation of Mitigation Measure 3.11-5. Because the project's individual impact would be reduced to a less-than-significant level, the project's contribution to the cumulatively significant impact would be less than cumulatively considerable (Draft EIR pp. 4-13 to 4-14)

### FINDING

The City Council finds, based upon substantial evidence in the record, that the potential impacts of the Costco Commercial Center Project would be less than significant. No additional mitigation measures are required.

# 7.12 PUBLIC SERVICES AND RECREATION

## Impact 3.12-1: Result in Substantial Adverse Physical Impacts Associated with the Provision of New or Physically Altered Fire or Police Facilities or the Need for New or Physically Altered Governmental Facilities

The project site is in a developing suburban area that is within the service area of the City's fire and police departments. The proposed facility would serve the city's existing population in northwest Fresno. The project would

not introduce new residents to the area and new or physically altered facilities would not be required. Further, the project would comply with all applicable fire safety regulations and pay fire impact fees.

### FINDING

The City Council finds, based upon substantial evidence in the record, that the potential impacts of the Costco Commercial Center Project would be less than significant. No mitigation measures are required.

## Impact 4-12: Cumulative Public Services and Recreation Impacts

The project would not result in substantial demand for public services. The cumulative effects of related projects are not significant and the project would not have a considerable contribution such that a new cumulatively significant impact would occur. (Draft EIR p. 4-14)

### FINDING

The City Council finds, based upon substantial evidence in the record, that the potential impacts of the Costco Commercial Center Project would be less than significant. No mitigation measures are required.

# 7.13 TRANSPORTATION AND CIRCULATION

## Impact 3.13-1: Conflict with a Program, Plan, Ordinance, or Policy Addressing the Circulation System, Including Transit, Roadway, Bicycle, and Pedestrian Facilities

The proposed project would be consistent with established City and regional policies and plans related to bicycle and pedestrian facilities and transit service in the project area. The proposed project's off-site improvements include construction of bicycle facilities along its western, southern, and northern frontages (North Riverside Drive, West Herndon Avenue, and Spruce Avenue, respectively) and would be consistent with the City of Fresno Active Transportation Program. Additionally, although demand would be minimal, the existing transit service has the capacity to accommodate any increase in ridership generated by the proposed project. Lastly, the proposed project's reclassification of West Herndon Avenue between North Riverside Drive and North Hayes Avenue would allow the project to construct the proposed intersection that would provide additional access to the project site. This general plan amendment would allow for consistency between the proposed project and the general plan. Therefore, the project would not conflict with a plan, program, ordinance, or policy addressing the circulation system. (Draft EIR pp. 3.13-11 to 3.13-13)

### FINDING

The City Council finds, based upon substantial evidence in the record, that the potential impacts of the Costco Commercial Center Project would be less than significant. No mitigation measures are required.

## Impact 3.13-4: Result in Inadequate Emergency Access

The proposed project would be designed according to City of Fresno standards and would be reviewed and approved by the City of Fresno and the appropriate emergency service providers. Additionally, the proposed project would develop a Traffic Control Plan to ensure sufficient emergency access is maintained during construction activities. The proposed project would meet all City design standards, municipal code regulations, and requirements

provided in the 2019 California Fire Code as adopted by the City of Fresno. Additionally, the proposed project would be subject to review by the City and emergency service departments to ensure adequate access is provided. Thus, the proposed project would provide adequate emergency access during construction and operation. (Draft EIR pp. 3.13-21 to 3.13-22)

### FINDING

The City Council finds, based upon substantial evidence in the record, that the potential impacts of the Costco Commercial Center Project would be less than significant. No mitigation measures are required.

## 7.14 UTILITIES

### Impact 3.14-1: Require or Result in the Relocation or Construction of New or Expanded Water, Wastewater Treatment or Storm Water Drainage, Electric Power, Natural Gas, or Telecommunications Facilities, the Construction or Relocation of which could cause Significant Environmental Effects

The project would develop a currently vacant site into a Costco facility, which would require extending the surrounding utility infrastructure onto the project site. All utility infrastructure extensions and hookups would occur within the disturbance area of the project site, the environmental effects of which have been analyzed in the EIR. The project's projected demand for water, electric power, and natural gas, along with the project's projected wastewater and stormwater output, are within the existing and future capacity of the utility providers that serve the project site. For these reasons, the project would not require the relocation or construction of new or expanded utility infrastructure that could result in significant environmental effects that are not evaluated in the EIR. (Draft EIR pp. 3.14-11 to 3.14-12)

### FINDING

The City Council finds, based upon substantial evidence in the record, that the potential impacts of the Costco Commercial Center Project would be less than significant. No mitigation measures are required.

### Impact 3.14-2: Have Insufficient Water Supplies Available to Serve the Project and Reasonably Foreseeable Future Development during Normal, Dry, and Multiple Dry Years

The Urban Water Management Planning Act projects that the City would have an excess of water through 2045 during normal, dry, and multiple dry years. While the project would require a GPA from Community Commercial to General Commercial, the City's *2020 Urban Water Management Plan* (UWMP) does not differentiate between commercial districts. Therefore, the project is accounted for within the UWMP's water supply calculation. Given that the project's water demand is accounted for in the City's UWMP projections for future development during normal, dry, and multiple dry years, and that the UWMP projections found that the City would have an excess of water in the aforementioned drought scenarios, there would be sufficient water supplies to serve the project. (Draft EIR pp. 3.14-12 to 3.14-13)

## FINDING

The City Council finds, based upon substantial evidence in the record, that the potential impacts of the Costco Commercial Center Project would be less than significant. No mitigation measures are required.

# Impact 3.14-3: Result in a Determination by the Wastewater Treatment Provider Which Serves or May Serve the Project That It Has Inadequate Capacity to Serve the Project's Projected Demand in Addition to the Provider's Existing Commitments

The City of Fresno Department of Public Utilities provides wastewater and sewer service to the project site. All wastewater is diverted to one of the City's two wastewater treatment plants that have an average flow capacity of 88.71 million gallons per day. The project would produce approximately 0.05 million gallons per day of wastewater. The City of Fresno Department of Public Utilities has reviewed the proposed project and has identified sewer facility charges as conditions of approval. The Department of Public Utilities has not identified inadequate capacity to serve the project's projected demand in addition to the City's existing commitments (Diaz and Gray pers. comm. 2021). Based upon the relative quantity of wastewater produced by the project and the consistency of the project with the General Plan land use designation for the project site, upon which the Department of Public Utilities bases future wastewater generation projections, it is anticipated that there is adequate capacity to accommodate provision of sewer service to the project site. (Draft EIR pp. 3.14-13 to 3.14-14)

## FINDING

The City Council finds, based upon substantial evidence in the record, that the potential impacts of the Costco Commercial Center Project would be less than significant. No mitigation measures are required.

# Impact 3.14-4: Generate Solid Waste in Excess of State or Local Standards, or in Excess of the Capacity of Local Infrastructure, or Otherwise Impair the Attainment of Solid Waste Reduction Goals or Not Comply with Federal, State, and Local Management and Reduction Statutes and Regulations Related to Solid Waste

The project would comply with all applicable federal, state, and local management and reduction statutes related to solid waste, including the state Integrated Waste Management Act and the solid waste policies of the City of Fresno General Plan. The project's anticipated solid waste production of 2.9 tons per day would comprise 0.13 percent of the American Avenue Landfill's maximum permitted throughput of 2,200 tons per day. The project would not generate solid waste in excess of the capacity of local infrastructure. Following closure of the American Avenue Landfill (anticipated in 2031), solid waste would be transported by the licensed waste hauler to the facility identified to accept waste from the city. The project would not be inconsistent with established regulations or generate solid waste that exceeds the capacity of existing infrastructure. (Draft EIR p. 3.14-14)

## FINDING

The City Council finds, based upon substantial evidence in the record, that the potential impacts of the Costco Commercial Center Project would be less than significant. No mitigation measures are required.

## Impact 4-14: Cumulative Utilities Impacts

The combined demand for some utilities, such as electricity, could result in the need to construct new or expected infrastructure. The cumulative effects of related projects would be potentially significant. However, the demand for utilities from the project and associated environmental effects would not result in cumulatively considerable environmental effects. (Draft EIR p. 4-15)

### FINDING

The City Council finds, based upon substantial evidence in the record, that the potential impacts of the Costco Commercial Center Project would be less than significant. No mitigation measures are required.

# 8 POTENTIALLY SIGNIFICANT ENVIRONMENTAL IMPACTS DETERMINED TO BE MITIGATED TO A LESS THAN SIGNIFICANT LEVEL

Based on the analysis contained in the EIR, the following impacts have been determined to fall within the category of impacts that can be reduced to less than significant levels with implementation of mitigation measures described below and put forth in the MMRP. Pursuant to Section 21081(a) of the PRC and Section 15091(a)(1) of the State CEQA Guidelines, the City Council finds that, for each of the following potentially significant effects identified in the EIR, changes or alterations have been required in, or incorporated into, the proposed project that mitigate the identified potentially significant effects on the environment to a less-than-significant level. These findings are explained below and are supported by substantial evidence in the record of proceedings.

## 8.1 ARCHAEOLOGICAL, HISTORICAL, AND TRIBAL CULTURAL RESOURCES

## Impact 3.4-1: Cause a Substantial Adverse Change in the Significance of Archaeological Resources

Although no known archaeological resources have been identified on the project site, project-related ground-disturbing activities may result in the discovery of or damage to yet undiscovered archaeological resources as defined in State CEQA Guidelines Section 15064.5. (Draft EIR pp. 3.4-12 to 3.4-13)

### MITIGATION MEASURES

#### Mitigation Measure 3.4-1a: Develop and Implement a Worker Environmental Awareness Program

The applicant shall retain a qualified professional archaeologist meeting the Secretary of the Interior's Professional Qualification Standards for archaeologists to prepare a worker environmental awareness program. The program shall be provided to all construction personnel and supervisors who will have the potential to encounter and alter archaeological resources. A copy of the worker environmental awareness program shall be provided to the City's Planning Division before construction activities begin. The topics to be addressed in the worker environmental awareness program will include, at a minimum:

- types of cultural resources expected on the project site;
- types of evidence that indicates cultural resources might be present (e.g., glass shards, lithic scatters);

- what to do if a worker encounters a possible resource;
- what to do if a worker encounters animal bones or possible human bones; and
- repercussions for removing or intentionally disturbing archaeological resources.

### Mitigation Measure 3.4-1b: Retain an Archaeological Monitor and Native American Monitor, and Halt Ground-Disturbing Activity upon Discovery of Subsurface Archaeological Features or Tribal Cultural Resources

In the event that any historic-era subsurface archaeological features or deposits (e.g., glass, metal, and/or ceramic refuse scatters), or prehistoric subsurface archaeological features or deposits (e.g., locally darkened soil ("midden"), stone tool chipping debris, bones, shell beads, or concentrated charcoal layers), are discovered during construction, all ground-disturbing activity within 50 feet of the resources shall be halted and the City shall be notified. The applicant will then retain the services of a qualified professional archaeologist to assess the significance of the find. Specifically, the archaeologist shall determine whether the find qualifies as an historical resource, a unique archaeological resource, or tribal artifacts. If the find does fall within one of these three categories, the qualified archaeologist shall then make recommendations to the City regarding appropriate procedures that should be used to protect the integrity of the resource and to ensure that no additional resources are affected. Procedures could include preservation in place, archival research, subsurface testing, and/or data recovery, with preservation in place being the preferred option if feasible. If the find is a tribal artifact, the City shall provide a reasonable opportunity for input from a Native American tribal representative affiliated with the location of the discovery; affiliation shall be determined by the City, in consultation with the qualified archaeologist, based on the City's AB 52 list or the contact list provided by the NAHC. If responsive, the tribal representative will then determine whether the artifact is considered a tribal cultural resource, as defined by PRC Section 21074. The applicant, in consultation with the City and Tribe, shall implement the recommended preservation options (which may include preservation in place, data recovery, mapping, capping, or avoidance), and proper curation of significant artifacts, if it determines that the measures are feasible in light of project design, logistics, and cost considerations.

## FINDING

The City Council finds that the above mitigation measures are feasible and would reduce the potential impacts of the Costco Commercial Center Project to a less-than-significant level. These mitigation measures are adopted by the City Council. Accordingly, the City Council finds that pursuant to PRC Section 21081(a)(1) and State CEQA Guidelines Section 15091(a)(1), changes or alterations have been required in, or incorporated into, project that would avoid or substantially lessen the significant environmental effect identified in the EIR.

## RATIONALE

Mitigation Measures 3.4-1a and 3.4-1b would minimize impacts by requiring that a worker environmental awareness program be prepared and provided to all construction personnel and supervisors who would have the potential to encounter and alter archaeological resources. These measures would also require construction to halt if potential archaeological resources are discovered, coordination with Native American groups (if applicable), implementation of preservation options (including data recovery, mapping, capping, or avoidance), and proper curation if significant artifacts are recovered. This mitigation would also be consistent with Objective HCR-1, Policy HCR-1-c, Objective HCR-2, Policy HCR-2-b, Policy HCR-2-c, and HCR-2-d of the City of Fresno General Plan and the Historic Preservation Ordinance. (Draft EIR p. 3.4-14)

# Impact 3.4-2: Cause a Substantial Adverse Change in the Significance of a Tribal Cultural Resource

Tribal consultation has not resulted in the identification of tribal cultural resources on the project site. Despite this, excavation activities associated with project construction may disturb or destroy previously undiscovered significant subsurface tribal cultural resources. (Draft EIR p. 3.4-14)

## MITIGATION MEASURES

### Mitigation Measure 3.4-1a: Develop and Implement a Worker Environmental Awareness Program

The applicant shall retain a qualified professional archaeologist meeting the Secretary of the Interior's Professional Qualification Standards for archaeologists to prepare a worker environmental awareness program. The program shall be provided to all construction personnel and supervisors who will have the potential to encounter and alter archaeological resources. A copy of the worker environmental awareness program shall be provided to the City's Planning Division before construction activities begin. The topics to be addressed in the worker environmental awareness program will include, at a minimum:

- types of cultural resources expected on the project site;
- types of evidence that indicates cultural resources might be present (e.g., glass shards, lithic scatters);
- what to do if a worker encounters a possible resource;
- what to do if a worker encounters animal bones or possible human bones; and
- repercussions for removing or intentionally disturbing archaeological resources.

### Mitigation Measure 3.4-1b: Retain an Archaeological Monitor and Native American Monitor, and Halt Ground-Disturbing Activity upon Discovery of Subsurface Archaeological Features or Tribal Cultural Resources

In the event that any historic-era subsurface archaeological features or deposits (e.g., glass, metal, and/or ceramic refuse scatters), or prehistoric subsurface archaeological features or deposits (e.g., locally darkened soil ("midden"), stone tool chipping debris, bones, shell beads, or concentrated charcoal layers), are discovered during construction, all ground-disturbing activity within 50 feet of the resources shall be halted and the City shall be notified. The applicant will then retain the services of a qualified professional archaeologist to assess the significance of the find. Specifically, the archaeologist shall determine whether the find qualifies as an historical resource, a unique archaeological resource, or tribal artifacts. If the find does fall within one of these three categories, the qualified archaeologist shall then make recommendations to the City regarding appropriate procedures that should be used to protect the integrity of the resource and to ensure that no additional resources are affected. Procedures could include preservation in place, archival research, subsurface testing, and/or data recovery, with preservation in place being the preferred option if feasible. If the find is a tribal artifact, the City shall provide a reasonable opportunity for input from a Native American tribal representative affiliated with the location of the discovery; affiliation shall be determined by the City, in consultation with the qualified archaeologist, based on the City's AB 52 list or the contact list provided by the NAHC. If responsive, the tribal representative will then determine whether the artifact is considered a tribal cultural resource, as defined by PRC Section 21074. The applicant, in consultation with the City and Tribe, shall implement the recommended preservation options (which may include preservation in place, data recovery, mapping, capping, or avoidance), and proper curation of significant artifacts, if it determines that the measures are feasible in light of project design, logistics, and cost considerations.

## FINDING

The City Council finds that the above mitigation measures are feasible and would reduce the potential impacts of the Costco Commercial Center Project to a less-than-significant level. These mitigation measures are adopted by the City

Council. Accordingly, the City Council finds that pursuant to PRC Section 21081(a)(1) and State CEQA Guidelines Section 15091(a)(1), changes or alterations have been required in, or incorporated into, project that would avoid or substantially lessen the significant environmental effect identified in the EIR.

## RATIONALE

Impacts related to tribal cultural resources would be reduced by requiring that a worker environmental awareness program be prepared and provided to all construction personnel and supervisors who will have the potential to encounter and alter cultural resources; and requiring construction to halt if potential archaeological resources are discovered, coordination with Native American groups (if applicable), implementation of preservation options (including preservation in place, data recovery, mapping, capping, or avoidance), and proper curation if significant artifacts are recovered. (Draft EIR p. 3.4-14)

# Impact 3.4-4: Directly or Indirectly Destroy a Unique Paleontological Resource or Site or Unique Geologic Feature

Although no known paleontological resources have been identified on the project site, project-related ground-disturbing activities may result in the discovery of or damage to yet undiscovered resources. (Draft EIR p. 3.4-15)

## MITIGATION MEASURES

### Mitigation Measure 3.4-4: Halt Ground-Disturbing Activity upon Discovery of Subsurface Paleontological Resources

If paleontological resources are discovered during earthmoving activities, the project applicant shall immediately halt operations within 30 feet of the find and notify the City. If the find is determined to be significant, it shall be salvaged by a qualified paleontologist retained by the project applicant following the standards of the SVP (2010) and curated at a certified repository such as the University of California Museum of Paleontology.

## FINDING

The City Council finds that the above mitigation measure is feasible and would reduce the potential impacts of the Costco Commercial Center Project to a less-than-significant level. These mitigation measures are adopted by the City Council. Accordingly, the City Council finds that pursuant to PRC Section 21081(a)(1) and State CEQA Guidelines Section 15091(a)(1), changes or alterations have been required in, or incorporated into, project that would avoid or substantially lessen the significant environmental effect identified in the EIR.

## RATIONALE

The potential for the project to result in the direct or indirect destruction of unique paleontological resources is low; however, the potential cannot be dismissed. With implementation of Mitigation Measure 3.4-4, which sets forth standard treatment measures to limit destruction of unique paleontological resources, the effect of the project on yet undiscovered paleontological resources would be effectively reduced. (Draft EIR p. 3.4-16)

# 8.2 BIOLOGICAL RESOURCES

## Impact 3.5-1: Result in Disturbance to or Loss of Special-Status Wildlife Species and Habitat

Project activities would include ground disturbance, tree removal, and other vegetation removal, which could result in disturbance, injury, or mortality of several special-status wildlife species if present, reduced breeding productivity of these species, and loss of species habitat. (Draft EIR pp. 3.5-13 and 3.5-15)

## MITIGATION MEASURES

### Mitigation Measure 3.5-1a: Conduct Take Avoidance Survey for Burrowing Owl, Implement Avoidance Measures, and Compensate for Loss of Occupied Burrows

- A qualified biologist shall conduct a focused survey for burrowing owls in accessible areas (i.e., not including private property) of habitat suitable for the species on and within 1,640 feet (500 meters) of the project site no less than 14 days before initiating ground disturbance activities using survey methods described in Appendix D of the CDFW 2012 Staff Report (CDFW 2012). Much of the area within this 1,640-foot survey area does not contain habitat suitable for burrowing owl (e.g., residential areas, commercial development, roads) and would not require surveys. Inaccessible areas that contain habitat suitable for burrowing owl (e.g., the Riverside Golf Course property) shall be surveyed using binoculars or a spotting scope.
- If no occupied burrows are found, the qualified biologist shall submit a report documenting the survey methods and results to the City of Fresno, and no further mitigation shall be required.
- If an active burrow is found within 1,640 feet of pending construction activities during the nonbreeding season (September 1 through January 31), the applicant shall establish and maintain a minimum protection buffer of 164 feet (50 meters) around the occupied burrow throughout construction. If an active burrow is found on property outside of the project site (e.g., the Riverside Golf Course), then the protection buffer shall be established on a map, and only the portion of the buffer within the project site shall be marked with fencing, flagging, or other means. The actual buffer size shall be determined by the qualified biologist based on the time of year and level of disturbance in accordance with guidance provided in the CDFW Staff Report on Burrowing Owl Mitigation (CDFW 2012). The protection buffer may be adjusted if, in consultation with CDFW, a qualified biologist determines that an alternative buffer shall not disturb burrowing owl use of the burrow because of particular site features or other buffering measures. If occupied burrows are present that cannot be avoided or adequately protected with a no-disturbance buffer, a burrowing owl exclusion plan shall be developed, as described in Appendix E of the CDFW Staff Report. Burrowing owls shall not be excluded from occupied burrows until the project burrowing owl exclusion plan is approved by CDFW. The exclusion plan shall include a compensatory habitat mitigation plan (see below).
- If an active burrow is found during the breeding season (February 1 through August 31), occupied burrows shall not be disturbed and shall be provided with a protective buffer at a minimum of 164 feet unless a qualified biologist verifies through noninvasive means that either: (1) the birds have not begun egg laying, or (2) juveniles from the occupied burrows are foraging independently and are capable of independent survival. The size of the buffer may be adjusted depending on the time of year and level of disturbance as outlined in the CDFW 2012 Staff Report. If an active burrow is found on property outside of the project site (e.g., the Riverside Golf Course), then the protection buffer shall be established on a map, and only the portion of the buffer within the site shall be marked with fencing, flagging, or other means. The size of the buffer may be reduced if a broad-scale, long-term, monitoring program acceptable to CDFW is implemented so that burrowing owls are not adversely affected. Once the fledglings are capable of independent survival, the owls can be evicted, and the burrow can

be destroyed per the terms of a CDFW-approved burrowing owl exclusion plan developed in accordance with Appendix E of CDFW 2012 Staff Report.

- If burrowing owls are evicted from burrows and the burrows are destroyed by implementation of project activities, the applicant shall mitigate the loss of occupied habitat in accordance with guidance provided in the CDFW 2012 Staff Report, which states that permanent impacts on nesting, occupied, and satellite burrows, and burrowing owl habitat (i.e., grassland habitat with suitable burrows) shall be mitigated such that habitat acreage and number of burrows are replaced through permanent conservation of comparable or better habitat with similar vegetation communities and burrowing mammals (e.g., ground squirrels) present to provide for nesting, foraging, wintering, and dispersal. The applicant shall retain a qualified biologist to develop a burrowing owl mitigation and management plan that incorporates the following goals and standards:
- Mitigation lands shall be selected based on comparison of the habitat lost to the compensatory habitat, including type and structure of habitat, disturbance levels, potential for conflicts with humans, pets, and other wildlife, density of burrowing owls, and relative importance of the habitat to the species throughout its range.
- If feasible, mitigation lands shall be provided adjacent or proximate to the project site so that displaced owls can relocate with reduced risk of injury or mortality. Feasibility of providing mitigation adjacent or proximate to the project site depends on availability of sufficient habitat to support displaced owls that may be preserved in perpetuity.
- If habitat suitable for burrowing owl is not available for conservation adjacent or proximate to the project site, mitigation lands can be secured off-site and shall aim to consolidate and enlarge conservation areas outside of planned development areas and within foraging distance of other conservation lands. Mitigation may be also accomplished through purchase of mitigation credits at a CDFW-approved mitigation bank, if available. Alternative mitigation sites and acreages may also be determined in consultation with CDFW.
- If burrowing owl habitat mitigation is completed through permittee-responsible conservation lands, the mitigation plan shall include mitigation objectives, site selection factors, site management roles and responsibilities, vegetation management goals, financial assurances and funding mechanisms, performance standards and success criteria, monitoring and reporting protocols, and adaptive management measures. Success shall be based on the number of adult burrowing owls and pairs using the site and if the numbers are maintained over time. Measures of success, as suggested in the CDFW 2012 Staff Report, shall include site tenacity, number of adult owls present and reproducing, colonization by burrowing owls from elsewhere, changes in distribution, and trends in stressors.

### Mitigation Measure 3.5-1b: Conduct Focused Surveys for Swainson's Hawk, White-Tailed Kite, Other Nesting Raptors, and Other Native Nesting Birds and Implement Protective Buffers

- To minimize the potential for loss of Swainson's hawk, white-tailed kite, other raptors, and other native birds, project construction activities (e.g., tree removal, vegetation clearing, ground disturbance, staging) shall be conducted during the nonbreeding season (approximately September 1-January 31, as determined by a qualified biologist), if feasible. If project construction activities are conducted during the nonbreeding season, no further mitigation shall be required.
- Within 14 days before the onset of project construction activities during the breeding season (approximately February 1 through August 31, as determined by a qualified biologist), a qualified biologist familiar with birds of California and with experience conducting nesting bird surveys shall conduct focused surveys for Swainson's hawk, white-tailed kite, other nesting raptors, and other native birds. Surveys shall be conducted in accessible areas (i.e., not including private property) within 0.5 mile of the project site for Swainson's hawk and white-tailed kite; within 500 feet of the site for other raptors; and within 50 feet of the site for non-raptor common native bird nests. Inaccessible areas that contain habitat suitable for nesting birds (e.g., the Riverside Golf Course property) shall be surveyed using binoculars or a spotting scope.

- If no nests are found, the qualified biologist shall submit a report documenting the survey methods and results to the City of Fresno, and no further mitigation shall be required.
- Impacts on nesting birds shall be avoided by establishing appropriate buffers around active nest sites identified during focused surveys to prevent disturbance to the nest. Project construction activity, including tree removal, shall not commence within the buffer areas until a qualified biologist has determined that the young have fledged, the nest is no longer active, or reducing the buffer would not likely result in nest abandonment. An avoidance buffer shall be implemented for Swainson's hawk and white-tailed kite in consultation with CDFW. CDFW guidelines recommend implementation of 0.25- or 0.5-mile-wide buffers for Swainson's hawk nests, but the size of the buffer may be decreased if a qualified biologist and the City of Fresno, in consultation with CDFW, determine that such an adjustment would not be likely to adversely affect the nest. For other species, a qualified biologist shall determine the size of the buffer for nests of non-special-status species after a site- and nest-specific analysis. Buffers typically shall be 500 feet for common raptors. Buffer size for non-raptor common bird species generally shall be at least 20 feet. Factors to be considered for determining buffer size shall include presence of natural buffers provided by vegetation or topography, nest height above ground, baseline levels of noise and human activity, species sensitivity, and proposed project construction activities. The size of the buffer may be adjusted if a qualified biologist determines that such an adjustment would not be likely to adversely affect the nest. Any buffer reduction for a listed or fully protected species (i.e., Swainson's hawk, white-tailed kite) shall require consultation with CDFW. If an active nest is found on property outside of the project site (e.g., the Riverside Golf Course), then the protection buffer shall be established on a map, and only the portion of the buffer within the project site shall be marked with fencing, flagging, or other means. Periodic monitoring of the nest by a qualified biologist during project construction activities shall be required if the activity has potential to adversely affect the nest, the buffer has been reduced, or if birds within active nests are showing behavioral signs of agitation (e.g., standing up from a brooding position, flying off the nest) during project construction activities, as determined by the qualified biologist.

## FINDING

The City Council finds that the above mitigation measures are feasible and would reduce the potential impacts of the Costco Commercial Center Project to a less-than-significant level. These mitigation measures are adopted by the City Council. Accordingly, the City Council finds that pursuant to PRC Section 21081(a)(1) and State CEQA Guidelines Section 15091(a)(1), changes or alterations have been required in, or incorporated into, project that would avoid or substantially lessen the significant environmental effect identified in the EIR.

## RATIONALE

Mitigation Measures 3.5-1a and 3.5-1b would minimize impacts by requiring preconstruction surveys for burrowing owl, Swainson's hawk, white-tailed kite, other common raptors, and other native birds, and implementation of protective measures for active nests. Specifically, Mitigation Measure 3.5-1a would reduce potential impacts on burrowing owl to a less-than-significant level by requiring a take avoidance survey for burrowing owl, implementation of measures to avoid injury or mortality of burrowing owls and destruction of active burrows if detected, and compensation if burrows cannot be avoided such that the habitat acreage and the number of burrows destroyed are replaced through permanent conservation of comparable or better habitat. Implementation of Mitigation Measure 3.5-1b would reduce potential impacts on Swainson's hawk, white-tailed kite, other raptors, and other common native nesting birds to a less-than-significant level by requiring focused surveys for nesting birds and implementation of measures to avoid disturbance, injury, or mortality of the species if nests are detected. (Draft EIR pp. 3.5-15 and 3.5-16)

# 8.3 NOISE

## Impact 3.11-3: Generate a Substantial Permanent Increase in Ambient Noise Levels in the Vicinity of the Project due to Operational Stationary and On-Site Noise in Excess of Standards Established in the Local General Plan or Noise Ordinance, or Applicable Standards of Other Agencies

The proposed project would involve the generation of noise from various stationary and other operations-related non-transportation noise sources. Combined noise levels from non-transportation noise sources would fluctuate depending on each noise source's location and proximity to sensitive receptors, the presence of noise barriers (i.e., building walls), operating hours, and if the nature of each noise is intermittent or continuous. Although noise may combine from the various generators, it is unlikely that combined noise levels would increase to levels that exceed the City's noise standards at nearby sensitive receptors. The HVAC equipment, parking area, tire center, car wash, and transformer and trash compactor would not exceed appliable City standards. However, the loading area could result in potentially significant levels of noise depending on project design.

### MITIGATION MEASURES

#### Mitigation Measure 3.11-3: Reduce Exposure of Existing Sensitive Receptors to Noise Generated by Loading Dock Activity

The project applicant shall construct a sound wall or other noise attenuating feature west of the loading docks with a demonstrated ability to result in a 4 dB noise decrease at the existing residences along North Riverside Drive.

### FINDING

The City Council finds that the above mitigation measure is feasible and would reduce the potential impacts of the Costco Commercial Center Project to a less-than-significant level. This mitigation measure is adopted by the City Council. Accordingly, the City Council finds that pursuant to PRC Section 21081(a)(1) and State CEQA Guidelines Section 15091(a)(1), changes or alterations have been required in, or incorporated into, project that would avoid or substantially lessen the significant environmental effect identified in the EIR.

### RATIONALE

The implementation of Mitigation Measure 3.11-3 would require the implementation of design features to reduce noise levels to meet required standards. (Draft EIR p. 3.11-25)

## Impact 3.11-5: Generate a Substantial Permanent Increase in Ambient Noise Levels in the Vicinity of the Project due to Intermittent Single-Event Noise Levels from Trucks in Excess of Standards Established in the Local General Plan or Noise Ordinance, or Applicable Standards of Other Agencies

The proposed project has the potential to expose nearby residents to single-event noise levels (SENLs) due to operation of heavy vehicles accessing the project site during operational activities. The closest sensitive receptor west

of North Riverside Drive could experience interior noise levels of approximately 66.4 dB SENLs exceeding a threshold of 65 dB SENL.

## MITIGATION MEASURES

### Mitigation Measure 3.11-5: Implement Traffic Noise Reduction Measures along North Riverside Drive

The project proponent shall implement noise reduction measures to ensure that exterior noise levels at residential land uses near the west side of North Riverside Drive do not exceed the City's current noise standard of 65 dB $L_{dn}$/CNEL under existing-plus-project conditions. This measure is consistent with General Plan Policy NS-1-I, which recommends the use of design alterations to reduce noise impacts. This performance standard can be achieved using either of the following measures. Therefore, if one option is not implemented, the other would be required.

- Pave the roadway segment with rubberized hot-mix asphalt or equivalent surface treatment with known noise-reducing properties on top of the roadway surface. The rubberized hot-mix asphalt overlay shall be designed with appropriate thickness and rubber component quantity (typically 15 percent by weight of the total blend), such that traffic noise levels are reduced by an average of 4 to 6 dB (noise levels vary depending on travel speeds, meteorological conditions, and pavement quality) as compared to noise levels generated by vehicle traffic traveling on standard asphalt. Rubberized hot-mix asphalt has been found to achieve this level of noise reduction in other parts of California (Sacramento County 1999). Pavement will require more frequent than normal maintenance and repair to maintain its noise attenuation effectiveness. The applicant shall fund the incremental cost for maintaining the roadway segment with the surface treatment.
- Construct a sound barrier taller than the 6-foot cinderblock wall that is currently present from West Spruce Avenue to West Herndon Avenue. The sound barrier shall be constructed of solid material (e.g., wood, brick, adobe, an earthen berm, boulders, or combination thereof). The reflectivity of each sound barrier shall be minimized to ensure that traffic noise reflected off the barrier does not contribute to an exceedance of applicable Leq standards at other receptors. The level of sound reflection from a barrier can be minimized with a textured or absorptive surface or with vegetation on or next to the barrier. A barrier that breaks the line of sight between a source and a receiver will typically result in at least 5 dB of noise reduction (Caltrans 2013: 2-41; FTA 2018: 42). Barriers higher than the line of sight provide increased noise reduction (FTA 2018: 16). Scenic quality factors shall be taken into account during design, such as using more natural materials (e.g., berms and boulders) to reduce the visible mass of a wall. All barriers shall be designed to blend into the landscape along the roadway, to the extent feasible. Ensuring a character consistent with the surrounding area may involve the use of strategically placed native trees or other vegetation; the addition of special materials (e.g., wood or stonework) on the façade of the sound wall; and/or a sound wall that is covered in vegetation. Additionally, the sound barrier shall meet the standards established in General Plan Policy NS-1-o which establishes aesthetic considerations for sound walls including a maximum allowable height of 15 feet. If the sound barriers ensure that exterior traffic noise levels on the residential properties would not exceed 60 dB Leq, then the applicant shall not be required to pave the roadway with a special low-noise surface treatment. Sound wall construction would only be implemented if all of the property owners on the west side of North Riverside Drive between West Herndon Avenue and West Spruce Avenue collectively agree to the mitigation.

## FINDING

The City Council finds that the above mitigation measure is feasible and would reduce the potential impacts of the Costco Commercial Center Project to a less-than-significant level. This mitigation measure is adopted by the City Council. Accordingly, the City Council finds that pursuant to PRC Section 21081(a)(1) and State CEQA Guidelines Section 15091(a)(1), changes or alterations have been required in, or incorporated into, project that would avoid or substantially lessen the significant environmental effect identified in the EIR.

## RATIONALE

The implementation of Mitigation Measure 3.11-5 would require the project applicant to construct a sound wall and/or pave North Riverside Drive with noise reducing materials. The City will require the project applicant to engage property owners to determine the feasibility of raising the existing sound wall. As described in the measure, the sound wall would only be implemented if all of the property owners on the west side of North Riverside Drive between West Herndon Avenue and West Spruce Avenue collectively agree to the mitigation. If sound barriers that reduce exterior traffic noise levels on the residential properties to less than 60 dB energy-equivalent noise level ($L_{eq}$) are constructed, then the applicant shall not be required to pave the roadway with a special low-noise surface treatment. However, if the sound wall component of the mitigation measure cannot feasibly reduce the exterior traffic noise levels to below established City thresholds, the rubberized hot-mix asphalt or equivalent surface treatment would be required. City staff have confirmed the feasibility of this option, which is less desirable due to ongoing maintenance requirements. The implementation of either one of these mitigation measure options would ensure residents near North Riverside Drive would not experience SENL above 65. (Draft EIR p. 3.11-29)

# 9 ENVIRONMENTAL EFFECTS OF THE PROJECT THAT ARE CONSIDERED UNAVOIDABLE SIGNIFICANT IMPACTS

As documented throughout Chapter 3, "Environmental Impacts and Mitigation Measures," and Chapter 4, "Cumulative Impacts," of the Draft EIR, after implementation of the recommended mitigation measures, most of the impacts associated with the project would be reduced to a less-than-significant level. The following impacts are considered significant and unavoidable; that is, no feasible mitigation is available to reduce the project's impacts to a less-than-significant level:

- Impact 3.11-1: Generate a Substantial Temporary Increase in Ambient Noise Levels in Excess of Standards Established in the Local General Plan or Noise Ordinance, or Applicable Standards of Other Agencies
- Impact 3.13-2: Conflict or Be Inconsistent with CEQA Guidelines Section 15064.3, Subdivision (b) Regarding Vehicle Miles Traveled
- Impact 3.13-3: Substantially Increase Hazards Due to a Geometric Design Feature (e.g., Sharp Curves or Dangerous Intersections) or Incompatible Uses (e.g., Farm Equipment)
- Impact 4-13: Cumulative Transportation and Circulation Impacts

## 9.1 NOISE

### Impact 3.11-1: Generate a Substantial Temporary Increase in Ambient Noise Levels in Excess of Standards Established in the Local General Plan or Noise Ordinance, or Applicable Standards of Other Agencies

Construction would be located in close proximity to existing noise-sensitive receptors. Most noise-generating construction activity would be performed during daytime hours, when construction noise is exempt from noise standards by the City of Fresno Municipal Code. However, it is possible that construction activity may be required during the non-exempt evening and nighttime hours (10:00 p.m. to 7:00 a.m., Monday through Saturday, and all-day Sunday) for activities such as large continuous concrete pours. On-site construction could start as early as 2:00 a.m. and the exterior nighttime noise standard of 50 dB between the hours of 10:00 p.m. and 7:00 a.m. could be exceeded during nighttime construction activities. Thus, potential nighttime construction activities could expose nearby noise-

sensitive receptors to noise levels that exceed City nighttime noise standards as detailed in the Municipal Code. (Draft EIR pp. 3.11-16 to 3.11-19)

## MITIGATION MEASURES

### Mitigation Measure 3.11-1: Implement Additional Measures to Reduce Exposure to Construction Noise Reduction during Noise-Sensitive Time Periods

For all outdoor construction activity that is to take place outside of the City of Fresno construction noise exception timeframes (i.e., 10:00 p.m. and 7:00 a.m., Monday through Saturday, and all hours of the day on Sunday), and that is anticipated to generate interior noise levels at sensitive receptors that exceed the City of Fresno General Plan interior noise standard of 45 dB for residential land uses, the construction contractor shall comply with the following measures:

- Consistent with Section 10-110 of the City Noise Control Ordinance, obtain an exception to Article 1, "Noise Regulations," through the Chief Administrative Officer. A permit may be issued authorizing noises prohibited by the noise ordinance whenever it is found that the public interest will be served thereby or that extreme hardship will result from the strict enforcement.
- Install temporary noise curtains as close as possible to the noise-generating activity such that the curtains obstruct the direct line of sight between the noise-generating construction activity and the nearby sensitive receptors. Temporary noise curtains shall consist of durable, flexible composite material featuring a noise barrier layer bounded to sound-absorptive material on one side. The noise barrier layer shall consist of rugged, impervious, material with a surface weight of at least one pound per square foot.
- Noise-reducing enclosures and techniques shall be used around stationary noise-generating equipment (e.g., concrete mixers, generators, compressors).
- Operate heavy-duty construction equipment at the lowest operating power possible. All construction equipment shall be properly maintained and equipped with noise-reduction intake and exhaust mufflers and engine shrouds, in accordance with manufacturers' recommendations. Equipment engine shrouds shall be closed during equipment operation.
- Where available and feasible, construction equipment with back-up alarms shall be equipped with either audible self-adjusting backup alarms or alarms that only sound when an object is detected. Self-adjusting backup alarms shall automatically adjust to 5 dB over the surrounding background levels. All non-self-adjusting backup alarms shall be set to the lowest setting required to be audible above the surrounding noise levels.
- Provide a minimum of one week of advanced notice to owners of all residential located within 350 feet of where nighttime construction activity would take place. This noticing shall inform the recipients of when and where nighttime construction would occur and the types of measures being implemented to lessen the impact at potentially affected receptors. This noticing shall also provide the contact information for the designated disturbance coordinator. The disturbance coordinator shall receive all public complaints and be responsible for determining the cause of the complaint and implementing any feasible measures to alleviate the problem.

## FINDINGS

Changes or alterations have been required in, or incorporated into, the project that avoid or substantially lessen the significant environmental effect as identified in the EIR (State CEQA Guidelines Section 15091[a][1]). However, the City Council finds that feasible mitigation measures may not reduce the identified significant impact to a level below significant. Therefore, this impact would remain significant and unavoidable. However, pursuant to PRC Section 21081(b), see the Statement of Overriding Considerations for the specific overriding economic, legal, social, technological, and other benefits of the project that outweigh this significant and unavoidable impact.

## RATIONALE

The proposed project is anticipated to require limited nighttime construction, which has the potential to result in short-term, temporary exceedances of the nighttime exterior noise standard. Interior noise standards would not be exceeded and sleep disruption is not anticipated. Therefore, actual effects would be limited to individuals outdoors between 10:00 p.m. and 7:00 a.m. on the specific night(s) of construction and their experience of the tranquil nighttime environment.

Implementation of Mitigation Measure 3.11-1 would provide substantial reductions in levels of construction noise exposure at noise-sensitive receptors by ensuring proper equipment use; and requiring the use of enclosures, shields, and noise curtains (noise curtains typically can reduce noise by up to 10 dB [EPA 1971]). Thus, construction noise could potentially be reduced from 63 dB $L_{eq}$ prior to mitigation to approximately 53 db $L_{eq}$ after Mitigation Measure 3.11-1 is implemented. Although noise reduction would be achieved with implementation of these measures, the effectiveness of Mitigation Measure 3.11-1 would depend upon the specific site conditions at the time of construction. Because it cannot be assured that the applicable noise standards can be met, this impact would remain significant and unavoidable.

# 9.2 TRANSPORTATION AND CIRCULATION

# Impact 3.13-2: Conflict or be Inconsistent with State CEQA Guidelines Section 15064.3, Subdivision (b)

Construction activity is temporary and would generate fewer than 500 daily trips; thus, the proposed project meets the screening criteria established in the City of Fresno *CEQA Guidelines for VMT Thresholds* while construction activities occur. Generation of vehicle miles traveled (VMT) attributed to project operation is expected to result in a net increase of average daily VMT by 129,326. The City of Fresno *CEQA Guidelines for VMT Thresholds* states that "VMT generated by retail projects would indicate a significant impact for any net increase in total VMT" (City of Fresno 2020); therefore, the proposed project would result in a significant impact to VMT. (Draft EIR pp. 3.13-13 to 3.13-15)

## MITIGATION MEASURES

### Mitigation Measure 3.13-2: Provide a Program to Reduce Costco Employees' VMT by at least 26 Percent

Costco shall provide a program that is designed to achieve at least a 26 percent reduction in employee VMT. The program shall be provided to the City for acceptance prior to issuance of a certificate of occupancy. Specific actions must include the following measures described in the California Air Pollution Control Officers Association's 2021 *Handbook for Analyzing Greenhouse Gas Emission Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equity*:

- **Commute Trip Reduction Marketing (estimated to result in up to 4 percent employee VMT reduction):** Costco shall implement a marketing strategy to promote Costco's commute reduction program. Information sharing and marketing promote and educate employees about their travel choices to the employment location beyond driving such as carpooling, taking transit, walking, and biking, thereby reducing VMT and greenhouse gas emissions. The following features (or similar alternatives) shall be provided:
  - on-site or online commuter information services,
  - employee transportation coordinators,
  - on-site or online transit pass sales, and
  - guaranteed ride home service.

- **Provide Ridesharing Program (estimated to result in up to 8 percent employee VMT reduction):** Costco shall develop and implement a ridesharing program. Ridesharing encourages carpooled vehicle trips in place of single-occupied vehicle trips, thereby reducing the number of trips, VMT, and greenhouse gas emissions. The following strategies provide examples of a multifaceted approach for promoting a rideshare program:
  - designating a certain percentage of desirable parking spaces for ridesharing vehicles,
  - designating adequate passenger loading and unloading and waiting areas for ridesharing vehicles, and
  - providing an app or website for coordinating rides.
- **Implement Subsidized or Discount Transit Program (estimated to result in up to 5.5 percent employee VMT reduction):** Costco shall provide free transit passes for employees. Reducing the out-of-pocket cost for choosing transit improves the competitiveness of transit against driving, increasing the total number of transit trips and decreasing vehicle trips. This decrease in vehicle trips results in reduced VMT and, thus, a reduction in greenhouse gas emissions.
- **Provide End-of-Trip Bicycle Facilities (estimated to result in up to 4.4 percent employee VMT reduction):** Costco shall install and maintain end-of-trip facilities for employee use. End-of-trip facilities include elements such as bike parking, bike lockers, showers, and personal lockers. The provision and maintenance of secure bike parking and related facilities encourages commuting by bicycle, thereby reducing VMT and greenhouse gas emissions.
- **Improve Street Connectivity (estimated to result in up to 30 percent employee VMT reduction):** Costco shall construct West Spruce Avenue along the northern site boundary, creating new connections between West Spruce Avenue and North Aurther Avenue. The increased connectivity and intersection density that would result from these improvements would facilitate shorter trips, thereby reducing VMT.
- **Provide Pedestrian Network Improvements/Construct Bike Facilities/Expand Bikeway Network (estimated to result in up to 10 percent employee VMT reduction[1]):** Costco shall construct new, 12-foot-wide pedestrian and bicycle paths along West Herndon Avenue and North Riverside Drive to improve pedestrian access and connect to a larger bicycle network. This encourages a mode shift from automobiles to biking and walking, resulting in VMT reduction.

## FINDING

Changes or alterations have been required in, or incorporated into, the project that avoid or substantially lessen the significant environmental effect as identified in the EIR (State CEQA Guidelines Section 15091[a][1]). However, the City Council finds that feasible mitigation measures would not reduce the identified significant impact to a level below significant. Therefore, this impact would remain significant and unavoidable. However, pursuant to PRC Section 21081(b), see the Statement of Overriding Considerations for the specific overriding economic, legal, social, technological, and other benefits of the project that outweigh this significant and unavoidable impact.

## RATIONALE

The primary source of daily VMT is warehouse shopping by Costco members. Members purchase items in bulk at Costco facilities, making walking, biking, or transit trips to the warehouse impractical. Bulk shopping generally requires access to a personal automobile and is often a single-destination outing. Mitigation that would substantially reduce the VMT of Costco members is infeasible due to the nature of Costco's land use and business model, which is inherently auto-oriented. Implementation of Mitigation Measure 3.13-2 would reduce employee trips. However, employee trips account for 436 daily trips (less than 2 percent of the total daily trips) and 13,385 VMT (approximately 7 percent of the daily VMT). Based on the California Air Pollution Control Officers Association's estimates in the Quantifying Greenhouse Gas Mitigation Measures Handbook (CAPCOA 2021), Mitigation Measure 3.13-2 could

[1] Measures T-18 through T-22-C are in the Neighborhood Design subsector. The VMT reduction from the combined implementation of all measures within this subsector is capped at 10 percent (CAPCOA 2021: 135).

achieve up to a 26 percent reduction in project employee commute VMT, which is less than 2 percent of the proposed project's total daily regional VMT. (Draft EIR p. 3.13-18)

# Impact 3.13-3: Substantially Increase Hazards Due to a Geometric Design Feature (e.g., Sharp Curves or Dangerous Intersections) or Incompatible Uses (e.g., Farm Equipment)

The proposed project would follow all safety protocol during construction activities and would develop a Traffic Control Plan in accordance with City standards. The proposed project would be required to meet City design standards and regulations, including internal circulation and off-site improvement standards for all modes of transportation. Additionally, the proposed project would be subject to ministerial review by the City; thus, ensuring applicable design requirements related to safety are met. However, as detailed in the *Fresno Costco Relocation Transportation Impact Analysis* (TIA) prepared for the proposed project (Kittelson & Associates 2023) and included as Appendix D to the Draft EIR, the proposed project would not meet safety thresholds related to intersection queuing. The City has issued several conditions of approval for the proposed project that would require the implementation of off-site improvements to reduce transportation hazards. However, no off-site improvements at the intersection of North Golden State Boulevard and West Herndon Avenue are included in the conditions of approval. (Draft EIR pp. 3.13-18 to 3.13-20)

## MITIGATION MEASURES

### Mitigation Measure 3.13-3: Provide Off-Site Improvements

Costco shall provide the following off-site improvements to alleviate queuing that would result in transportation hazards to the greatest extent feasible prior to issuance of a certificate of occupancy:

- North Golden State Boulevard and West Herndon Avenue: Revise signal phasing to optimize green-time allocation relative to anticipated volumes. To reduce queue blockage of the intersection, "DO NOT BLOCK" pavement markings are required for the full width of North Weber Avenue. On the north leg of the intersection (i.e., North Golden State Boulevard, northeast of West Herndon Avenue), reconstruct the median to extend the south bound dual left-turn pocket as far north as possible without interfering with the existing north bound left-turn pocket at West Kathryn Avenue.

All off-site improvements shall be designed in accordance with City roadway design standards and are subject to review by the City and responsible emergency service providers.

## FINDING

Changes or alterations have been required in, or incorporated into, the project that avoid or substantially lessen the significant environmental effect as identified in the EIR (State CEQA Guidelines Section 15091[a][1]). However, the City Council finds that feasible mitigation measures would not reduce the identified significant impact to a level below significant. Therefore, this impact would remain significant and unavoidable. However, pursuant to PRC Section 21081(b), see the Statement of Overriding Considerations for the specific overriding economic, legal, social, technological, and other benefits of the project that outweigh this significant and unavoidable impact.

## RATIONALE

Following construction of off-site improvements detailed in Mitigation Measure 3.13-3, the southbound left-turn queue at the North Golden State Boulevard and West Herndon Avenue intersection would continue to overflow the available storage for the turn pocket and block the adjacent travel lane by approximately 50 feet. Constraints in the

median preclude increasing the southbound left-turn lanes to fully accommodate the 95th percentile queue. As discussed in the EIR, existing roadway layout and approved projects in the area preclude additional design features to address this impact. Specifically, the alignment of the California High Speed Rail parallels the existing railway northeast of North Golden State Boulevard and limits the available right of way for improvements. According to analysis in the TIA, the spillback condition would occur during the most congested period of the day and would not be a continuous condition. However, because the southbound left-turn queue at the North Golden State Boulevard and West Herndon Avenue would continue to overflow the available storage for the turn pocket and block the adjacent travel lane during certain times throughout the day, this would remain a transportation hazard with mitigation. (Draft EIR p. 3.13-21)

## Impact 4-13: Cumulative Transportation and Circulation Impacts

The project would result in an increase in VMT. Growth projected in the cumulative impact area could also result in increased VMT. The discussion of VMT impacts associated with the project in Impact 3.13-2 is inherently a cumulative impact analysis because it addresses project generated VMT based on an efficiency threshold that is aligned with long-term goals and relevant plans. The proposed project would result in a net increase of 129,326 regional daily VMT. (Draft EIR p. 4-14)

### MITIGATION MEASURES

No additional feasible mitigation measures are available to reduce impacts.

### FINDING

The City Council finds that feasible mitigation measures would not reduce the identified significant impact to a level below significant. Therefore, this impact would remain significant and unavoidable. However, pursuant to PRC Section 21081(b), see the Statement of Overriding Considerations for the specific overriding economic, legal, social, technological, and other benefits of the project that outweigh this significant and unavoidable impact.

### RATIONALE

The implementation of Mitigation Measure 3.13-2, which requires the project applicant to provide a commute reduction program would be focused on reducing employee trips, which account for less than 2 percent of trips. Due to the unique nature of the project, which involves bulk shopping that generally requires access to a personal automobile and is often a single-destination outing, it would be infeasible to implement other mitigation to minimize VMT impacts from Costco members. (Draft EIR p. 4-14)

# 10 FINDINGS REGARDING PROJECT ALTERNATIVES

PRC Section 21002 provides 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[.]" The same statute states that the procedures required by CEQA "are 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."

Where a lead agency has determined that, even after the adoption of all feasible mitigation measures, a project as proposed will still cause one or more significant environmental effects that cannot be substantially lessened or avoided, the agency, prior to approving the project as mitigated, must first determine whether, with respect to such impacts, there remain any project alternatives that are both environmentally superior and feasible within the meaning of CEQA. Although an EIR must evaluate this range of *potentially* feasible alternatives, an alternative may ultimately

be deemed by the lead agency to be "infeasible" if it fails to fully promote the lead agency's underlying goals and objectives with respect to the project. (*California Native Plant Society v. City of Santa Cruz* (2009) 177 Cal.App.4th 957, 999–1000 (*CNPS*); *Citizens for Open Government v. City of Lodi* (2012) 205 Cal.App.4th 296, 314–315; *City of Del Mar v. City of San Diego* (1982) 133 Cal.App.3d 401, 417; *Los Angeles Conservancy v. City of West Hollywood* (2017) 18 Cal.App.5th 1031, 1041-1043.) "'Feasibility' under CEQA encompasses 'desirability' to the extent that desirability is based on a reasonable balancing of the relevant economic, environmental, social, and technological factors." (*Ibid*.; see also *CNPS*, *supra*, 177 Cal.App.4th at p. 1001.) Thus, even if a project alternative will avoid or substantially lessen any of the significant environmental effects of the project, the decision-makers may reject the alternative if they determine that specific considerations make the alternative infeasible.

# 10.1 ALTERNATIVES CONSIDERED IN THE EIR

The EIR identified and compared the significant environmental impacts of alternatives in Chapter 4, "Alternatives." The emphasis of the analysis is on a determination of whether the alternative would reduce, eliminate, or create new significant impacts, as well as the alternative's relative beneficial effects compared to the project and how well the alternative meets each of the project objectives. In accordance with the provisions of State CEQA Guidelines Section 15126.6, the EIR identified and considered the following reasonable range of feasible alternatives to the proposed project. These alternatives would be capable, to varying degrees, of reducing identified impacts.

- Alternative 1a: No Project Alternative assumes continued operation of the existing Costco facility at its current location, but also assumes development of the project site with the type and intensity of commercial uses consistent with the existing General Plan land use designation and zoning.
- Alternative 1b: No Development Alternative assumes continued operation of the existing Costco facility at its current location and no development of the project site.
- Alternative 2: Reduced Size Costco Warehouse assumes that the proposed warehouse at the proposed site would be similar in size to the existing Costco warehouse.
- Alternative 3: Mixed-Use Costco Center Alternative would adjust the land use mix on the project site to include high-density residential development intended to promote VMT efficiency.

The City Council finds that the range of alternatives studied in the EIR reflects a reasonable range of alternatives.

## 10.1.1 Alternative 1: Alternative 1a: No Project Alternative - Development Consistent with Existing Land Use and Zoning

Alternative 1a assumes that development of the site would occur consistent with existing land use designation (Community Commercial) and zoning (Community Commercial) of the site. The existing Community Commercial designation allows a floor area ratio (FAR) of 1.0, whereas the proposed General Commercial designation allows a FAR of 2.0, which is twice the floor area allowed under the existing designation. Also, whereas the General Commercial designation allows uses with higher traffic volumes, such as strip malls, wholesale businesses, and specialized retail, the Community Commercial designation is intended for commercial development that primarily serves local needs, such as medium-scale retail, office, civic and entertainment use, supermarkets, drug stores, and supporting uses. Based on the applicable development standards, and assuming that future development would be consistent with City standards related to building coverage, setbacks, landscaping, and building heights, future development of the site is anticipated to include commercial/retail development totaling approximately 120,000 square feet (s.f.), which is approximately half the intensity of the proposed project. It should be noted that, although Alternative 1a would include less overall development, this analysis assumes that no portion of the site would remain vacant, and that the entire site would be graded. However, because there would be less overall floor area, there would likely be opportunities for increased landscape areas.

Under Alternative 1a, the existing Costco facility on West Shaw Avenue would continue to operate. Operation of the existing facility is accounted for in the baseline, existing conditions described throughout this EIR. For this reason, continued operation and associated energy use, VMT, and air pollutant and greenhouse gas (GHG) emissions of the magnitude disclosed for existing operations are considered a continuation of baseline conditions and are not considered impacts resulting from Alternative 1a. However, the existing Shaw Avenue Costco has existing circulation challenges and limited parking would persist with intensification of the use of the Costco property as the customer base in northwest Fresno continues to grow. (Draft EIR pp. 6-7 to 6-8)

## ENVIRONMENTAL EFFECTS

Implementation of Alternative 1a would result in less overall development than the project and would be consistent with the existing general plan land use designation and zoning for the project site. As demonstrated in the Draft EIR analysis, most impacts would be similar to the proposed project. Impacts related to Noise and Vibration and Traffic and Circulation would be reduced under this alternative. Under Alternative 1a, the overall floor area would be substantially smaller than the proposed project and may also consist of a series of smaller structures (depending on the specific development); therefore, overnight foundation pouring may not be necessary under this scenario. Also, the smaller size would also likely allow for increased site design flexibility, which could place structures farther from existing sensitive receptors than under the proposed project. Because of these reasons, there is a reasonable likelihood that Alternative 1a could result in a substantial reduction to the project's significant impacts related to construction noise.

As described above, unlike the proposed General Commercial designation, which allows uses with higher traffic volumes, the existing Community Commercial designation is intended for commercial development that primarily serves local needs, such as medium-scale retail, office, civic and entertainment use, supermarkets, drug stores, and supporting uses. Therefore, a project consistent with this designation would generally be more VMT efficient than a wider-serving project, such as a Costco facility. Also, whereas some transportation demand management measures are not very effective for a Costco facility (i.e., shoppers buying in bulk would not generally be able use bicycles or transit), they may be much more feasible for a local-serving retail development. Therefore, Alternative 1a may substantially reduce the project's significant impacts related to VMT and traffic hazards due to overall reduced traffic volumes. (Draft EIR pp. 6-8 to 6-9)

## RELATION TO PROJECT OBJECTIVES

Alternative 1a would not achieve the basic project objective of establishing a facility of sufficient size that integrates several services, including home and/or business delivery service, under one roof. Alternative 1a would also not meet the project objective related to meeting demand for automobile services, including gasoline, car wash, and tire center because the car wash is not consistent with existing zoning. Other objectives related to operation of a retail center that serves the community with a wide variety of goods in northwest Fresno that is serviced by adequate infrastructure, creating a commercial center that is integrated with the overall design context, reducing energy consumption, increasing taxable sales, and minimizing circulation conflicts could be achieved by commercial development of the site under Alternative 1a. (Draft EIR p. 6-8)

## FINDINGS

The City Council finds that Alternative 1a would result in similar or reduced impacts on the project site and would not alleviate existing adverse logistical conditions on the project site that make continued operation or redevelopment of the Shaw Avenue Costco less desirable. The City Council rejects Alternative 1a because it does not meet many of the project objectives which establish the underlying purpose of the project.

## 10.1.2 Alternative 1b: No Project Alternative – No Development

The No Development Alternative is a version of the "no project" alternative wherein the existing environmental setting is maintained. The existing Costco facility on West Shaw Avenue would continue to operate.

This alternative assumes that permissible development would not occur on the project site and the lot would remain vacant. Alternative 1b is provided for informational purposes and discloses the effects on the environment if the environmental setting were maintained. Although the site remaining undeveloped is a potential outcome of not approving the proposed project, decision-makers could only select and implement this alternative if the City also purchased the property or changed the land use designation to ensure a "no development" outcome. Otherwise, it is reasonably foreseeable that development of the property would occur as described in Alternative 1a. (Draft EIR p. 6-9)

### ENVIRONMENTAL EFFECTS

The No Development Alternative would eliminate all environmental effects of construction and operation identified in the Draft EIR. Alternative 1b would not conflict with City policies adopted for the purposes of avoiding or mitigating an environmental effect. However, the No Development Alternative would not be consistent with the existing general plan land use designation and zoning, which have been established by the City to identify appropriate locations for development. Eliminating the development potential of the project site could result in increased pressure to develop commercial land uses in other areas of northwest Fresno that are less suitable for this type of development. With the exception of land use and planning impacts, which would be similar to the proposed project, all impacts would be reduced under this alternative. (Draft EIR pp. 6-9 to 6-10)

### RELATION TO PROJECT OBJECTIVES

The No Development Alternative would not meet any of the objectives established for the project. (Draft EIR p. 6-9)

### FINDINGS

The City Council finds that Alternative 1b would result in similar or reduced impacts on the project site. However, the alternative would not alleviate existing adverse logistical conditions on the project site that make continued operation or redevelopment of the Shaw Avenue Costco less desirable. Moreover, the City does not intend to purchase the property or changed the land use designation to ensure a "no development" outcome. The City Council rejects Alternative 1b because it does not meet any of the project objectives, which establish the underlying purpose of the project.

## 10.1.2 Alternative 2: Reduced Size Costco Warehouse

The Reduced Size Costco Warehouse Alternative assumes development of a Costco warehouse on the project site that is the same size as the existing Costco warehouse on Shaw Avenue. As with redevelopment of the existing Costco site, a smaller warehouse would not accommodate consolidation of the market delivery operation and those processes would continue at their current location. The fueling station would also be substantially smaller than the proposed station, and there would be no car wash. The site would be designed to place the smaller structure as far as reasonably possible from existing sensitive receptors that back onto North Riverside Drive across from the project site. Under this alternative, there may be a slight reduction in construction activity, but the general duration and types of construction would be similar. (Draft EIR p. 6-10)

## ENVIRONMENTAL EFFECTS

Implementation of the Reduced Size Costco Warehouse Alternative would result in less intense development on the project site, although the overall level of ground disturbance and the construction period and intensity would be similar. Overall operations would be similar. The significant impacts associated with the project that cannot be minimized or avoided through mitigation relate to traffic queuing, VMT, and construction noise. Reducing the size of the Costco warehouse would result in a reduction in total VMT. Although the Reduced Size Costco Warehouse Alternative may result in a slight decrease in total VMT, it would not eliminate the VMT generated. It would also not change the effectiveness of mitigation measures (i.e., shoppers buying in bulk would not typically use bicycle or transit). Regarding the project's significant impact related to noise, a smaller version of the project may allow more flexibility in terms of site design and layout, potentially providing more distance between specific project elements and existing sensitive receptors. Because noise generally attenuates according to the "inverse square law" (i.e., a doubling of distance from a point source reduces sound pressure by approximately 6 dB), the amount of increased distance a smaller structure would allow would not likely avoid the impact, but in combination with the mitigation measures identified, the construction-related noise impact would be further reduced. (Draft EIR p. 6-11)

## RELATION TO PROJECT OBJECTIVES

This alternative would likely not adequately meet several of the project objectives, including expanding the space available for integrated retail sales and services in the local market, providing a state-of-the-art facility to better serve the membership in the greater Fresno area, integrated automobile services, and developing a facility that is large enough to accommodate all the uses and services that Costco provides to its members elsewhere. (Draft EIR p. 6-10)

## FINDINGS

The City Council finds that Alternative 2 would result in similar or slightly reduced impacts on the project site while substantially limiting the development potential and functional use of the site. The City Council rejects Alternative 2 because it does not meet many of the project objectives, which establish the underlying purpose of the project.

# 10.1.3 Alternative 3: Mixed-Use Costco Center Alternative

Under the Mixed-Use Costco Center Alternative, a two-story Costco warehouse would be developed within a smaller footprint to allow room for a low-to-mid-rise, high-density housing development on the project site. Given the large number of commercial/retail uses in the area and the generally low level of medium- and high-density housing, a high-density housing development may perform moderately well in this location compared to the project. The overall floor area would likely be smaller than the proposed Costco warehouse but may be larger than the existing Costco warehouse. Due to site constraints, no gas station, car wash, or market delivery operation would be included under this alternative.

Critically, the Costco warehouse structure would be designed such that loading docks and other noise- and air-pollutant-generating facilities and equipment are located on the side of the building farthest from any sensitive receptor and as far from sensitive receptors as possible, including the on-site high-density residential structure. It should be noted that this design constraint may affect the feasibility of this alternative and that more detailed design work would be needed to make the final feasibility determination. (Draft EIR pp. 6-11 to 6-12)

## ENVIRONMENTAL EFFECTS

Implementation of the Mixed-Use Costco Center Alternative would result in greater intensity of development on the project site, although the overall level of ground disturbance and the construction period and intensity would be similar. The Mixed-Use Costco Center Alternative would involve development of structures much larger in scale than the proposed project, including a two-story Costco warehouse and a low-to-mid-rise high-density housing

development. Under this alternative the mass of structures on the project site would be much more prominent and would not generally be consistent with the one- and two-story single-family residential development or the single-story commercial development in the vicinity. The contrast would be especially stark on the northern portion of the site, which is adjacent to the fairway for Riverside Golf Course. Although this change in visual character may not rise to the level of a significant impact that cannot be minimized, it would be greater than the proposed project.

Because the Mixed-Use Costco Center Alternative would result in a smaller commercial warehouse and includes uses that are more VMT efficient than the Costco warehouse facility alone, the alternative would likely result in somewhat reduced VMT impacts compared to the project. However, because the project site is not in a jobs-rich area that would support walkable/bikeable employment for on-site residents, the VMT efficiency associated with the residential development would be limited, and not likely enough to counter the project's daily VMT generation. As discussed above, the City's *CEQA Guidelines for VMT Thresholds* establishes that any increase in net VMT for retail projects would be a significant impact. Therefore, although the project would likely result in modest reductions, it would not avoid or minimize the significant impact related to VMT. (Draft EIR pp. 6-12 to 6-13)

### RELATION TO PROJECT OBJECTIVES

This alternative would likely not meet several project objectives, including developing a Costco facility that is large enough to accommodate all the uses and services that Costco provides to its members elsewhere and meeting member demand for automobile services, including gasoline. Also, because this alternative would involve large multi-story structures in an area dominated by one-and two-story residential development and single-story commercial development, it would likely not achieve the objective related to integration with the overall design context for the area. (Draft EIR p. 6-12)

### FINDINGS

The City Council finds that Alternative 3 would result in the potential for moderate reductions in the significant and unavoidable noise and transportation impacts of the project. However, Alternative 3 may also increase aesthetic impacts. While potentially feasible, this alternative would limit the functionality and efficiency of the larger, integrated Costco Commercial Center and would require the project applicant to engage a third party of the design and development of high-density housing because Costco does not have housing development credentials. Because Costco does no construct housing, this is considered an excessive development requirement. The City Council rejects Alternative 3 because it does not substantially reduce impacts, does not meet several of the project objectives, and would result in a project of different scope than the proposal.

## 10.2 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

Because the No Development Alternative (Alternative 1b, described in Section 6.4.2 of the Draft EIR) would avoid all adverse impacts resulting from construction and operation of the proposed project, it is the environmentally superior alternative. However, the No Development Alternative would not meet the objectives of the project. The No Project Alternative (Alternative 1a, described in Section 6.4.1 of the Draft EIR) would also avoid the significant and unavoidable effects of the project, while achieving some of the project objectives related to providing a commercial center on the site.

When the environmentally superior alternative is the No Project Alternative, the State CEQA Guidelines (Section 15126[d][2]) require selection of an environmentally superior alternative from among the other action alternatives evaluated. Alternative 2: Reduced Size Costco Warehouse would be environmentally superior action alternative because although the environmental impacts would be similar to the proposed project, and no significant impacts or significant and unavoidable impacts would be completely avoided, the project's significant impacts related to VMT and construction noise would be slightly reduced. (Draft EIR p. 6-13)

As described above, the City Council finds that Alternative 2 would result in similar or slightly reduced impacts on the project site while substantially limiting the development potential and functional use of the site. The City Council rejects Alternative 2 because it does not meet many of the project objectives, which establish the underlying purpose of the project.

# 11 CONCLUSION

In accordance with CEQA and the State CEQA Guidelines, the City Council adopts these Findings as part of its certification of the Final EIR for the project. Pursuant to Section 21082.1l(3) of the PRC, the City Council also finds that the Final EIR reflects the City Council's independent judgment as the lead agency for the project. As required by CEQA, the City, in adopting these Findings, also adopts an MMRP for the project. The City finds that the MMRP, which is incorporated by reference and made a part of these Findings, meets the requirements of Section 21081.6 of the PRC by providing for the implementation and monitoring of measures intended to mitigate potentially significant effects of the project. Based on the entire record before the City, and having considered the significant and unavoidable impacts of the project, the City hereby determines that all feasible mitigation within the responsibility and jurisdiction of the City has been adopted to reduce or avoid the potentially significant impacts identified in the EIR, and that no additional feasible mitigation is available to further reduce significant impacts.

# 12 STATEMENT OF OVERRIDING CONSIDERATIONS

As discussed in the Findings of Fact above, approval of the Costco Commercial Center Project (hereafter the project) will result in significant adverse environmental effects that cannot be avoided with the adoption of all feasible mitigation measures. Further, there are no feasible project alternatives that would mitigate or substantially lessen the impacts. Despite the occurrence of these effects, however, the Fresno City Council chooses to approve the project because, in its view, the economic, environmental, social, and other benefits of the project will render the significant effects acceptable.

In making this Statement of Overriding Considerations the City Council has considered the information contained in the EIR for the project and the record of proceedings in which the project was considered. The City Council hereby determines that the project's benefits outweigh the significant unmitigated adverse impacts, as discussed below.

## 12.1 SIGNIFICANT AND UNAVOIDABLE IMPACTS

Pursuant to PRC Section 21081(b) and CEQA Guidelines Section 15093, the City Council has balanced the benefits of the project against the following significant unavoidable adverse impacts and has adopted all feasible mitigation measures with respect to these impacts.

- **Impact 3.11-1:** Generate a Substantial Temporary Increase in Construction Noise Levels in Excess of Applicable Standards Established in the Local General Plan or Noise Ordinance, or Applicable Standards of Other Agencies
- **Impact 3.13-2:** Conflict or Be Inconsistent with CEQA Guidelines Section 15064.3, Subdivision (b) Regarding Vehicle Miles Traveled
- **Impact 3.13-3:** Substantially Increase Hazards Due to a Geometric Design Feature (e.g., Sharp Curves or Dangerous Intersections) or Incompatible Uses (e.g., Farm Equipment)
- **Impact 4-13:** Cumulative Transportation Impacts

### 12.1.1 Construction Noise (Impact 3.11-1)

As described above in Section 9, "Environmental Effects of the Project that are Considered Unavoidable Significant Impacts," the proposed project is anticipated to require limited nighttime construction, which has the potential to result in short-term, temporary exceedances of the nighttime exterior noise standard. Interior noise standards would not be exceeded and sleep disruption is not anticipated. Therefore, actual effects would be limited to individuals outdoors between 10:00 p.m. and 7:00 a.m. on the specific night(s) of construction and their experience of the tranquil nighttime environment. In addition, mitigation has been identified that is anticipated to sufficiently reduce noise levels at nearby sensitive receptors to eliminate the significant impact.

The significant and unavoidable impact is identified due to uncertainty. If significant impacts occur, they would be limited to individuals outside at night during the limited construction window.

### 12.1.2 Vehicle Miles Traveled (Impact 3.13-2 and Impact 4-13)

As described above in Section 9, "Environmental Effects of the Project that are Considered Unavoidable Significant Impacts," the primary source of daily VMT is warehouse shopping by Costco members. Members purchase items in bulk at Costco facilities, making walking, biking, or transit trips to the warehouse impractical. Mitigation that would substantially reduce the VMT of Costco Members is infeasible.

The implementation of Mitigation Measure 3.13-2 would reduce employee trips. However, employee trips account for 436 daily trips (less than 2 percent of the total daily trips) and 13,385 VMT (approximately 7 percent of the daily VMT). (Draft EIR p. 3.13-18)

The City's standard of no net increase in VMT for commercial projects cannot be achieved by a warehouse retail project due to the practical considerations of purchasing items in bulk. The concept of VMT is largely tied to the understanding of vehicle exhaust as a major contributor to global GHG emissions. Importantly, bulk shopping doe present the opportunity for numerous efficiencies in shipping and packaging that may reduce GHG emissions compared to other commercial projects. As described in Section 3.7 of the Draft EIR, the project is consistent with the GHGRP and would not result in significant GHG emissions overall. Additionally, through regulatory mechanisms in place, such as the Advanced Clean Cars program and Advanced Clean Trucks, gasoline and diesel fuel consumption will continue to decrease as California's on-road transportation sectors electrifies over time.

### 12.1.3 Traffic Hazards (Impact 3.13-3)

As described above in Chapter 9, "Environmental Effects of the Project that are Considered Unavoidable Significant Impacts," following construction of off-site improvements detailed in Mitigation Measure 3.13-3, the southbound left-turn queue at the North Golden State Boulevard and West Herndon Avenue intersection would continue to overflow the available storage for the turn pocket and block the adjacent travel lane by approximately 50 feet. Constraints in the median preclude increasing the southbound left-turn lanes to fully accommodate the 95th percentile queue. Specifically, the alignment of the California High Speed Rail parallels the existing railway northeast of North Golden State Boulevard and limits the available right of way for improvements. According to analysis in the TIA, the spillback condition would only occur during the most congested period of the day. (Draft EIR p. 3.13-21)

The City has required all feasible mitigation to address this intermittent condition, which presents a traffic hazard only if motorists are not adequately attentive to the turn pocket spillover. This area is undergoing change due to the construction of the Highspeed Rail, which both limits the City's ability to expend the roadway and creates a dynamic environment where the impact may be less severe in the cumulative condition (i.e., once the rail improvements are complete).

Therefore, the significant and unavoidable impact is due to intermittent conditions in an area undergoing changes to the transportation network. The project alternatives are not anticipated to substantially reduce this impact.

## 12.2 OVERRIDING CONSIDERATIONS

CEQA requires decision makers to balance, as applicable, the economic, legal, social, technological or other benefits of a project against its significant and unavoidable environmental impacts when determining whether to approve the project. If the specific economic, legal, social, technological or other benefits of the project outweigh the significant and unavoidable impacts, those impacts may be considered "acceptable" (CEQA Guidelines Section 15093(a)). When significant impacts are not avoided or lessened, CEQA requires the agency to state, in writing, the specific reasons for considering a project acceptable. Those reasons must be based on substantial evidence in the EIR or elsewhere in the administrative record (CEQA Guidelines Section 15093(b)).

In the City Councils' judgment, the project and its benefits outweigh its unavoidable significant effects. The following statements, based in part upon the project objectives described in the EIR and Findings, support this conclusion. The substantial evidence supporting the various benefits can be found in the administrative record including the preceding Findings, which are incorporated by reference into this section. The City Council finds that each of the enumerated benefits is individually meritorious and, taken together, provide substantial public benefits that justify adoption of the project.

- The project would provide convenient shopping to serve existing and projected demand for retail warehouse shopping in the growing area of northwest Fresno.
- The project would result in a state-of-the-art facility of sufficient size to integrate several services, including home and/or business delivery service, under one roof. This promotes operational efficiencies compared to existing Costco warehouse and market delivery operations.
- The project would be conditioned on the completion of several elements of the transportation network in northwest Fresno, including a pedestrian pathway along West Herndon Avenue and the completion of West Spruce Avenue. The project would be consistent with the furtherance of General Plan policies that support multimodal transportation and complete streets, such as Policy MT-1-b, Policy MT-1-g and Policy MT-1-j.
- The project would continue and increase big-box retail store sales tax revenues received by the City.
- The project is consistent with Objective ED-1 of the General Plan to support economic development by maintaining a strong working relationship with the business community and improving the business climate for current businesses.

## 12.3 CONCLUSION

After balancing environmental costs against project benefits, the City Council has concluded that the benefits the City will derive from the project outweigh the anticipated impacts to noise and transportation. The City Council has chosen to accept certain environmental impacts because to eliminate them would unduly compromise some other important economic, fiscal, environmental, land use or other goal.

The City Council finds that any residual or remaining effects on the environment resulting from the project, identified as significant and unavoidable in the Findings of Fact, are acceptable due to the benefits set forth in this Statement of Overriding Considerations. The City Council finds and determines that the project and the supporting environmental documentation provide for a positive balance of the competing goals and that the economic, fiscal, environmental, land use or other benefits to be obtained by the project outweigh any environmental and related potential detriments from the Project. The City Council has concluded that the Project's implementation will represent a net positive impact on the City based upon a comprehensive analysis of all the underlying planning and environmental documentation. Therefore, the City adopts this Statement of Overriding Considerations.

# 13 REFERENCES

California Air Pollution Control Officers Association. 2021. California Emissions Estimator Model. Available: https://www.caleemod.com/. Accessed July 20, 2022.

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———. 2020. *Fresno General Plan Public Review Draft Program Environmental Impact Report*. State Clearinghouse Number 2019050005. Prepared by LSA, Fresno. CA.

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# ERRATA TO THE FINAL EIR

## INTRODUCTION

The City of Fresno (City) has prepared this Errata sheet to clarify and correct information in the Final Environmental Impact Report (Final EIR) for the Fresno Costco Commercial Center Project (State Clearinghouse No. 2021100443). Pursuant to State CEQA Guidelines Section 15088.5, recirculation is not required where the new information added to the EIR merely clarifies or amplifies or makes insignificant modifications in an adequate EIR. This Errata sheet includes minor text edits to the Final EIR for the project. Revisions herein do not contain significant new information that alter the conclusions of the Final EIR, result in any new significant environmental impacts, or deprive the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project.

## STAFF INITIATED TEXT CHANGES

The Final EIR is revised as follows to provide greater clarity. Text additions are identified with double underline and text deletions are provided in double ~~strikethrough~~.

### Chapter 2: Responses to Comments

In Table 2-1 (Final EIR page 2-1), the footnote on the row for Comment O1 in Table 2-1 (Final EIR page 2-1) has been removed, as shown below. This change has no effect on the treatment of the comment in the responses contained in the Final EIR.

**Table 2-1 List of Commenters**

| Letter No. | Commenter | Date |
|---|---|---|
| AGENCIES | | |
| A1 | California Department of Fish and Wildlife | August 14, 2023 |
| A2 | California Department of Transportation | August 15, 2023 |
| A3 | San Joaquin Valley Air Pollution Control District | August 23, 2023 |
| ORGANIZATIONS | | |
| O1 | Burke, Williams & Sorensen, LLP, on behalf of Costco Wholesale | August 28, 2023[‡] |
| INDIVIDUALS | | |
| I1 | Matthew Schellenberg | July 21, 2023 |
| I2 | Teresa Sanchez | July 21, 2023 |
| I3 | Dolores Davidian | July 19, 2023 |
| I4 | Vernon Valmonte | July 18, 2023 |
| I5 | Denise King | July 17, 2023 |
| I6 | Sharon Ross | July 17, 2023 |
| I7 | Susan Hansen | July 17, 2023 |
| I8 | Claudia Readwright | July 17, 2023 |
| I9 | Shahzaib Zaman | July 17, 2023 |
| I10 | Tj Atwal | July 17, 2023 |
| I11 | Rey Alvarez | July 17, 2023 |
| I12 | Agnes Habellion | July 16, 2023 |

| Letter No. | Commenter | Date |
|---|---|---|
| I13 | Linnea and David Faeth | July 16, 2023 |
| I14 | Alana L. Lewis | July 16, 2023 |
| I15 | Sharon Henson | July 16, 2023 |
| I16 | Jeannette Correa | July 16, 2023 |
| I17 | Dantenello Velasquez | July 15, 2023 |
| I18 | Randy Ames | July 15, 2023 |
| I19 | Kiersten Winrow | July 14, 2023 |
| I20 | Joseph Pulido | July 14, 2023 |
| I21 | Jeremy Bruno | July 14, 2023 |
| I22 | Bob Eurich | July 14, 2023 |
| I23 | Sukhi Dhillon | July 14, 2023 |
| I24 | Sakit Bibra | July 14, 2023 |
| I25 | Anya Ellis | July 14, 2023 |
| I26 | Michael and Joan Paine | July 14, 2023 |
| I27 | Bekah Bryant | July 14, 2023 |
| I28 | Randy Mills | July 13, 2023 |
| I29 | William and Melody Hardaway | July 13, 2023 |
| I30 | Geoff J. | July 13, 2023 |
| I31 | Birdevinder | July 13, 2023 |
| I32 | Bryan Miller | July 13, 2023 |
| I33 | Colton Metzler | July 13, 2023 |
| I34 | Ty Murphy | July 13, 2023 |
| I35 | Jax Ward | July 13, 2023 |
| I36 | Elizabeth Mendoza | July 13, 2023 |
| I37 | J. Chmielewski | July 13, 2023 |
| I38 | Kent Yamaguchi | July 13, 2023 |
| I39 | Nick Quisenberry | July 13, 2023 |
| I40 | Don Marshall | July 13, 2023 |
| I41 | Jerry Montejano | July 13, 2023 |
| I42 | William Duane Peverill | July 21, 2023 |
| I43 | Lorraine Arrington | July 21, 2023 |
| I44 | Dr. Danielle Biggs | July 21, 2023 |
| I45 | Holden Markwith | July 21, 2023 |
| I46 | David Scott | July 22, 2023 |
| I47 | Amy Siliznoff | July 22, 2023 |
| I48 | Betty Williams | July 22, 2023 |
| I49 | Jensen Vang | July 22, 2023 |
| I50 | Melody Wolverton | July 22, 2023 |
| I51 | Joseph Pulido | July 22, 2023 |
| I52 | John Olszowka | July 23, 2023 |
| I53 | Justin Latham | July 23, 2023 |

| Letter No. | Commenter | Date |
|---|---|---|
| I54 | Charles Ognibene | July 23, 2023 |
| I55 | Jamey Schmidt | July 24, 203 |
| I56 | William Duane Peverill | July 24, 2023 |
| I57 | Lorraine Arrington | July 24, 2023 |
| I58 | Pat Yaralian | July 25, 2023 |
| I59 | Michael Van | July 25, 2023 |
| I60 | Sabrina Hernandez | July 26, 2023 |
| I61 | Javier Morales | July 27, 2023 |
| I62 | James and Louisa Weyant | July 27, 2023 |
| I63 | Shirley Hutchison | July 27, 2023 |
| I64 | Maria Leon | July 27, 2023 |
| I65 | Norman S. Stahl | July 27, 2023 |
| I66 | Jesus Diaz | July 27, 2023 |
| I67 | Anthony Scheideman | July 27, 2023 |
| I68 | Rick and Kathy Haskill | July 28, 2023 |
| I69 | Kevin Cartwright | July 28, 2023 |
| I70 | Adalino | July 28, 2023 |
| I71 | Juan Duran | July 28, 2023 |
| I72 | Miguel Duran | July 28, 2023 |
| I73 | Fabrizio Robalino | July 31, 2023 |
| I74 | Celso "Sal" Romero, Jr. | July 31, 2023 |
| I75 | Cindy Diaz | August 1, 2023 |
| I76 | Joy Hinrichsen | August 2, 2023 |
| I77 | Garrett Schaefer | August 3, 2023 |
| I78 | Lynda Allison Doty | August 8, 2023 |
| I79 | Tom Basset | August 8, 2023 |
| I80 | Beth Durbin | August 9, 2023 |
| I81 | Sandra J. Iley | August 9, 2023 |
| I82 | Stephanie S. | August 10, 2023 |
| I83 | Thomas Coppin | August 10, 2023 |
| I84 | Dawn Mathews | August 10, 2023 |
| I85 | Larry Rodriguez | August 11, 2023 |
| I86 | Sylvia Fernandez | August 11, 2023 |
| I87 | Jens Andersen | August 13, 2023 |
| I88 | Richee Xavonglianekham | August 14, 2023 |
| I89 | Janet Bergman | August 15, 2023 |
| I90 | Robin Snowden | August 17, 2023 |
| I91 | Shauna Sandin | August 18, 2023 |
| I92 | Charles Yuvienco | August 19, 2023 |
| I93 | Darius Assemi | August 21, 2023 |
| I94 | Noel Delgado | August 21, 2023 |

| Letter No. | Commenter | Date |
|---|---|---|
| I95 | Ray Gonzales | August 24, 2023 |
| I96 | Jennifer Airheart | August 24, 2023 |
| I97 | Amy Zehring | August 25, 2023 |
| I98 | Brian and Sherryl Kellogg | August 24, 2023 |
| I99 | Rodger B. Jensen | August 25, 2023 |
| I100 | James Fleck | August 28, 2023 |
| I101 | Gabriel Ledesma | August 28, 2023 |
| I102 | Lauryn Medina | September 1, 2023[1] |
| I103 | Daniel Brannick | August 31, 2023[1] |

[1] The comment was received after the close of the public comment period.

The text introducing Mitigation Measure 3.13-2 was clarified in the Final EIR in response Comment O1-3 (Final EIR page 2-33). This same change is also identified in "Revisions to Section 3.13, 'Transportation and Circulation'" (beginning on Final EIR page 3-4). One change made to that table was not underlined to indicate new text and included an insignificant typographical error. The "Notes" column in Table 3.13-5 for Measure T-11 has been updated as follows to reflect the addition of text that was made in the Final EIR but not properly identified with underline text:

**Table 3.13-5 Transportation Sector Measures to Reduce VMT**

| | Mitigation Measure | Maximum Potential VMT Reduction[1] | Feasible/Applicable to the project? | Notes |
|---|---|---|---|---|
| T-1 | Increase Residential Density | 30% from project VMT | N/A | The proposed project does not include residential uses. |
| T-2 | Increase Job Density | 30% from project VMT | N/A | This is a plan/communitywide strategy and is not applicable. |
| T-3 | Provide Transit-Oriented Development | 31% from project VMT | N/A | This is a plan/communitywide strategy and is not applicable. |
| T-4 | Integrate Affordable and Below Market Rate Housing | 28.6% from project/site multifamily residential VMT | N/A | The proposed project does not include residential uses. |
| T-5 | Implement Commute Trip Reduction Program (Voluntary) | 4% project/site employee commute VMT | ~~Yes~~ No | ~~See Mitigation Measure 3.13-2 below.~~ Measures T-7 through T-11 must be implemented as part of T-5 to achieve the maximum employee commute VMT reduction. Because T-11 would not be feasible, the commute trip reduction program would not meet the full list of CAPCOA parameters. |

| | Mitigation Measure | Maximum Potential VMT Reduction[1] | Feasible/Applicable to the project? | Notes |
|---|---|---|---|---|
| T-6 | Implement Commute Trip Reduction Program (Mandatory Implementation and Monitoring) | 26% from project/site employee commute VMT | ~~Yes~~ No | ~~See Mitigation Measure 3.13-2 below.~~ Measures T-7 through T-11 must be implemented as part of T-6 to achieve the maximum employee commute VMT reduction. Because T-11 would not be feasible, the commute trip reduction program would not meet the full list of CAPCOA parameters. |
| T-7 | Implement Commute Trip Reduction Marketing | 4% project/site employee commute VMT | Yes | See Mitigation Measure 3.13-2 below. |
| T-8 | Provide Ridesharing Program | 8% project/site employee commute VMT | Yes | See Mitigation Measure 3.13-2 below. |
| T-9 | Implement Subsidized or Discounted Transit Program | 5.5% from employee/resident | Yes | See Mitigation Measure 3.13-2 below. |
| T-10 | Provide End-of-Trip Bicycle Facilities | 4.4% project/site employee commute VMT | Yes | See Mitigation Measure 3.13-2 below. |
| T-11 | Provide Employer-Sponsored Vanpool | 20.4% project/site employee commute VMT | ~~Yes~~ No | ~~See Mitigation Measure 3.13-2 below.~~ A private vanpool program would involve the capital cost of purchasing vans plus the operating cost of insurance~~s~~, would raise liability concerns, and would pose logistical challenges such as equal treatment of employees and rules regarding private use of the vans. This measure cannot be feasibly implemented to reduce VMT. |
| T-12 | Price Workplace Parking | 20% project/site employee commute VMT | N/A | Measure ineffective due to readily available, uncontrolled and free parking in the immediate vicinity of the proposed project. |
| T-13 | Implement Employee Parking Cash-Out | 12% project/site employee commute VMT | N/A | Measure ineffective due to readily available, uncontrolled and free parking in the immediate vicinity of the proposed project. |
| T-14 | Provide Electric Vehicle Charging Infrastructure | -- | N/A | See Mitigation Measure 3.3-2a. This measure does not affect VMT. |
| T-15 | Limit Residential Parking Supply | 13.7% from residences' VMT | N/A | The proposed project does not include residential uses. |
| T-16 | Unbundle Residential Parking Costs from Property Cost | 15.7% from project VMT | N/A | The proposed project does not include residential uses. |

| | Mitigation Measure | Maximum Potential VMT Reduction[1] | Feasible/Applicable to the project? | Notes |
|---|---|---|---|---|
| T-17 | Improve Street Connectivity | 30% from vehicle travel in the plan/community | Yes | The proposed project would construct West Spruce Avenue along the northern project site boundary improving street connectivity. Additionally, the project would construct North Arthur Avenue along the eastern project site boundary, connecting West Spruce Avenue and West ~~Spruce~~ Herndon Avenue. See Chapter 2, "Project Description~~.~~," and Mitigation Measure 3.13-2 below. |
| T-18 | Provide Pedestrian Network Improvement | 6.4% from vehicle travel in the plan/community | Yes | Pedestrian facility improvements provided as part of the proposed project. See Chapter 2, "Project Description~~.~~," and Mitigation Measure 3.13-2 below. |
| T-19-A | Construct or Improve Bike Facility | 0.8% from vehicles parallel roadways | Yes | Bicycle facility improvements provided as part of the proposed project. See Chapter 2, "Project Description~~.~~," and Mitigation Measure 3.13-2 below. |
| T-19-B | Construct or Improve Bike Boulevard | 0.2% from vehicles on roadway | Yes | Bicycle facility improvements provided as part of the proposed project. See Chapter 2, "Project Description~~.~~," and Mitigation Measure 3.13-2 below. |
| T-20 | Expand Bikeway Network | 0.5% from vehicles on roadway | Yes | Bicycle facility improvements provided as part of the proposed project. See Chapter 2, "Project Description~~.~~," and Mitigation Measure 3.13-2 below. |
| T-21-A | Implement Conventional Carshare Program | 0.15% from vehicle travel in the plan/community | No | This is a plan/communitywide strategy and is not feasible. |
| T-21-B | Implement Electric Carshare Program | VMT reduction not quantified—see CAPCOA handbook | No | This is a plan/communitywide strategy and is not feasible. |
| T-22-A | Implement Pedal (Non-Electric) Bikeshare Program | 0.2% from vehicle travel in the plan/community | No | This is a plan/communitywide strategy and is not feasible. |
| T-22-B | Implement Electric Bikeshare Program | 0.06% from vehicle travel in the plan/community | No | This is a plan/communitywide strategy and is not feasible. |
| T-22-C | Implement Scootershare Program | 0.07% from vehicle travel in the plan/community | No | This is a plan/communitywide strategy and is not feasible. |
| T-23 | Provide Community-Based Travel Planning | 2.3% from vehicle travel in the plan/community | N/A | The proposed project does not include residential uses. This measure applies to residences. |

| | Mitigation Measure | Maximum Potential VMT Reduction[1] | Feasible/Applicable to the project? | Notes |
|---|---|---|---|---|
| T-24 | Implement Market Price Public Parking (On-Street) | 30% from vehicle travel in the plan/community | No | The applicant, Costco, does not have jurisdiction over public on-street parking facilities and operation. |
| T-25 | Extend Transit Network Coverage or Hours | 4.6% from vehicle travel in the plan/community | No | The applicant, Costco, does not have jurisdiction over the operation of transit service. |
| T-26 | Increase Transit Service Frequency | 11.3% from vehicle travel in the plan/community | No | The applicant, Costco, does not have jurisdiction over the operation of transit service. |
| T-27 | Implement Transit-Supportive Roadway Treatments | 0.6% from vehicle travel in the plan/community | No | This is a plan/communitywide strategy and is not feasible. |
| T-28 | Provide Bus Rapid Transit | 13.8% from vehicle travel in the plan/community | No | The applicant, Costco, does not have jurisdiction over the operation of transit service. |
| T-29 | Reduce Transit Fares | 1.2% from vehicle travel in the plan/community | No | This is a plan/communitywide strategy and is not feasible. |
| T-30 | Use Cleaner-Fuel Vehicles | -- | N/A | This measure does not affect VMT. |

Notes:

1: The CAPCOA Handbook identifies the maximum potential GHG reduction associated with identified measures; however, the CAPCOA Handbook concludes that for the particular measures selected, the percent reduction in VMT would be the same as the percent reduction in GHG emissions. For clarity, this table reports reductions in relation to VMT.

## Chapter 3: Revisions to the Draft EIR

The Final EIR acknowledges revisions to the site plan that occurred after publication of the Draft EIR. As explained in Chapter 1, "Introduction," of the Final EIR these proposed design refinements include reduced warehouse size, changes to the design of the warehouse entry, a shorter car wash tunnel, and parking lot design changes. As indicated in the Draft EIR, the proposed changes to the project design do not affect the analysis or conclusions in the Draft EIR and the potential environmental effects of the project are unaffected. Although the Final EIR provides edits to the Draft EIR language to reflect the design refinements, the City has determined that these revisions are not necessary based on the fact that that the changes do not affect analysis or conclusions. As a result, these revised text have been omitted, as reflected below.

Page 3-1 of the Final EIR is revised as follows:

### ~~Revisions to "Executive Summary"~~

~~The first sentence in Section ES.2.4, "Characteristics of the Project," on page ES-2 is revised as follows to reflect the revised site plan:~~

> ~~The proposed Costco building would occupy 241,342 219,126 square feet, of which approximately 24,000 square feet would be reserved for storage and receiving.~~

### Revisions to Chapter 2, "Project Description"

~~Table 2-1 on page 2-10 is revised as follows to reflect the revised site plan:~~

**Table 2-1 Project Elements**

| Structure | Area (square feet) |
|---|---|
| **Warehouse Retail Building Footprint** | **241,342 219,216** |
| Warehouse/Retail | 162,264 163,539 |
| Loading/Back of house/Storage/Receiving | 23,881 4,422 |
| Market delivery operation | 46,834 |
| Open canopy space | 5,126 3,233 |
| Building envelope | 2,9555 1,188 |
| **Fuel canopy** | **12,885** |
| **Car wash** | **4,800** |

Source: Data provided by Urban Planning Partners in 2022 and 2023.

The first sentence on page 2-13 under the heading "Costco Warehouse Building" is revised as follows to reflect the revised site plan:

> The proposed warehouse would occupy 241,342 219,126 square feet of which approximately 24,000 square feet would be reserved for storage and receiving.

The description under the heading "Parking" on page 2-14 is revised as follows to reflect the revised site plan:

> The project includes 889 873 total parking stalls, which meets the City of Fresno's minimum parking requirements for the project. These parking stalls would include a total of 21 25 accessible spaces and 53 92 electric vehicle-ready parking stalls. The design would be in compliance with City and Americans with Disabilities Act (ADA) requirements. The project also would provide bicycle parking in accordance with the City's Citywide Development Code.

The text of the second paragraph on page 3-2 of the Final EIR is removed:

The first bullet on page 2-22, which describes the entitlements requested from the City is revised to read:

- Approve a Conditional Use Permit to construct a ±241,342 219,126 square-foot, warehouse retail building with a ±4,800 square-foot car wash; and an ±13,000 square-foot, 32-station fuel canopy.

The heading "Revisions to Section 3.1, 'Aesthetics'" (Final EIR page 3-2) and all text that follows is removed, as shown below:

## Revisions to Section 3.1, "Aesthetics"

The first sentence under Impact 3.1-1 on page 3.1-6 is revised as follows to reflect the revised site plan:

> The project would construct an approximately 241,342 219,126 square-foot single-story, contemporary-style retail building in the southeast corner of the project site, and a car wash and fueling stations along the northern portions of the site.

Under the heading "Revisions to Section 3.11, 'Noise and Vibration'" beginning on page 3-2 of the Final EIR, the following text is removed:

~~The first sentence under the subheading "Parking and Gas Station" on page 3.11-23 is revised as following to reflect the revised site plan:~~

> ~~Based on the current conceptual plan the proposed project would include 829~~ 873 ~~parking spaces to accommodate Costco members and employees.~~

In addition, the following change to the Draft EIR is added to page 3-3 of the Final EIR. The City has identified revisions necessary to noise Mitigation Measure 3.11-3 to clarify implementation of the measure and ensure consistency with the analyses in the Draft EIR. Specifically, the City identified a typographical error in the mitigation that incorrectly reports the required noise reduction compared to the analysis in the Draft EIR. The City is correcting that error to increase the noise reduction required by the mitigation. As part of those revisions, the City has also struck restrictive language related to the location of potential noise attenuating features that could be used to achieve the reductions to allow flexibility in identification of appropriate design changes that would provide noise reductions.

> Mitigation Measure 3.11-3 on page 3.11-25 has been modified as follows to further clarify implementation:
>
> > Mitigation Measure 3.11-3: Reduce Exposure of Existing Sensitive Receptors to Noise Generated by Loading Dock Activity
> > The project applicant shall construct a sound wall west of the loading docks or other noise attenuating feature ~~west of the loading docks~~ with a demonstrated ability to result in a ~~4~~ 9 dB noise decrease at the eastern property line of the existing residences along North Riverside Drive.

The City has also identified revisions necessary to noise Mitigation Measure 3.11-5, which is related to single-event noise levels, to clarify implementation of the measure and ensure consistency with the analysis in the Draft EIR. Page 3.11-14 of the Draft EIR notes, under the subheading "Selection of Noise Metrics for Thresholds of Significance," that because the City does not have "SENL standards for analyzing heavy vehicle activity that expose receptors for a relatively short period, this noise impact analysis applies SENL standards recommended by the Federal Interagency Committee on Aviation Noise." The analysis under Impact 3.11-5 (Draft EIR page 3.11-28) applies these metrics, concluding that "SENL's at the nearest noise-sensitive receptors would exceed 65 SENL" (Draft EIR page 3.11-28). However, the text of the mitigation measure refers to the City's Community Noise Equivalent Level (CNEL) standards, which are standards weighted over a 24-hour period and are not the basis of the analysis provided.

This change modifies the mitigation to better align with the analysis in the EIR related to noise measurements, clarifying that that the standard is for interior noise as measured by SENL. The revision also cleans up text that was clarified in the Final EIR through addition of text to the introduction language within the measure. Specifically, text was added in the Final EIR in response to comments to clarify that "if one option is not implemented, the other would be required." As part of this cleanup, text at the end of the measure indicating the same has been removed. This change does not affect the effectiveness of the measure or the applicant's obligations. Note that there are legal requirements that must be met to modify the existing sound wall on private property, which is the reason for the options presented in the mitigation.

> Mitigation Measure 3.11-5: Implement Traffic Noise Reduction Measures along North Riverside Drive
> The project proponent shall implement noise reduction measures to ensure that ~~exterior~~ interior noise levels at residential land uses near the west side of North Riverside Drive do not exceed ~~the~~

~~City's current noise standard of~~ 65 SENL ~~dB $L_{dn}$/CNEL~~ under existing-plus-project conditions. This measure is consistent with General Plan Policy NS-1-I, which recommends the use of design alterations to reduce noise impacts. This performance standard can be achieved using either of the following measures. Therefore, if one option is not implemented, the other would be required.~~:~~

- Pave the roadway segment with rubberized hot-mix asphalt or equivalent surface treatment with known noise-reducing properties on top of the roadway surface. The rubberized hot-mix asphalt overlay shall be designed with appropriate thickness and rubber component quantity (typically 15 percent by weight of the total blend), such that traffic noise levels are reduced by an average of 4 to 6 dB (noise levels vary depending on travel speeds, meteorological conditions, and pavement quality) as compared to noise levels generated by vehicle traffic traveling on standard asphalt. Rubberized hot-mix asphalt has been found to achieve this level of noise reduction in other parts of California (Sacramento County 1999). Pavement will require more frequent than normal maintenance and repair to maintain its noise attenuation effectiveness. The applicant shall fund the incremental cost for maintaining the roadway segment with the surface treatment.
- Construct a sound barrier taller than the 6-foot cinderblock wall that is currently present from West Spruce Avenue to West Herndon Avenue. The sound barrier shall be constructed of solid material (e.g., wood, brick, adobe, an earthen berm, boulders, or combination thereof). The reflectivity of each sound barrier shall be minimized to ensure that traffic noise reflected off the barrier does not contribute to an exceedance of applicable $L_{eq}$ standards at other receptors. The level of sound reflection from a barrier can be minimized with a textured or absorptive surface or with vegetation on or next to the barrier. A barrier that breaks the line of sight between a source and a receiver will typically result in at least 5 dB of noise reduction (Caltrans 2013: 2-41; FTA 2018: 42). Barriers higher than the line of sight provide increased noise reduction (FTA 2018: 16). Scenic quality factors shall be taken into account during design, such as using more natural materials (e.g., berms and boulders) to reduce the visible mass of a wall. All barriers shall be designed to blend into the landscape along the roadway, to the extent feasible. Ensuring a character consistent with the surrounding area may involve the use of strategically placed native trees or other vegetation; the addition of special materials (e.g., wood or stonework) on the façade of the sound wall; and/or a sound wall that is covered in vegetation. Additionally, the sound barrier shall meet the standards established in General Plan Policy NS-1-o which establishes aesthetic considerations for sound walls including a maximum allowable height of 15 feet. ~~If the sound barriers ensure that exterior traffic noise levels on the residential properties would not exceed 60 dB $L_{eq}$, then the applicant shall not be required to pave the roadway with a special low-noise surface treatment. Sound wall construction would only be implemented if all of the property owners on the west side of North Riverside Drive between West Herndon Avenue and West Spruce Avenue collectively agree to the mitigation.~~

As described above, the City has determined that revisions to the Draft EIR to change the precise square footage noted throughout the Draft EIR are not necessary based on the fact that that the changes do not affect analysis or conclusions. As a result, the heading "Revisions to Section 3.14, 'Utilities'" (Final EIR page 3-8) and all text that follows is removed, as shown below:

~~**Revisions to Section 3.14, "Utilities"**~~

~~The text under "Water Demand and Wastewater Output" on page 3.14-9 is revised as follows to reflect the revised site plan:~~

~~CEQA Guidelines Section 15155 requires preparation of a water supply assessment (WSA) when a project is of sufficient size to be defined as a "water demand project." Several characteristics can deem a project a "water demand project" including:~~

- ~~A shopping center or business establishment employing more than 1,000 persons or having more than 500,000 square feet of floor space (CEQA Guidelines Section 15155(a)(1)(B).~~

~~The project is estimated to employ approximately 300 individuals, and the warehouse and gas station would encompass approximately 241,342 232,101 square feet. It does not meet the definition of a "water demand project" pursuant to Section 15155 of the State CEQA Guidelines. Preparation of a WSA is not required for the project.~~