

City Council Regular Meeting RECEIVED

April 18, 2024

2024 APR 16 P 4: 53

FRESNO CITY COUNCIL

CITY OF FRESNO
CITY CLERK'S OFFICE



Public Comment Packet

ITEM(S)

9:25 A.M. (ID 24-487) HEARING to Consider Plan Amendment and Rezone Application No. P21-01960, Conditional Use Permit Application No. P21-01959, Conditional Use Permit Application No. P21-03251, Planned Development Permit Application No. P21-03252 and related Final Environmental Impact Report (FEIR), State Clearinghouse (SCH) No. 2021100443 pertaining to ±22.4 acres of property located on the northeast corner of West Herndon Avenue and North Riverside Drive (Council District 2) - Planning & Development Department.

[TITLE TRUNCATED FOR SUPPLEMENTAL PACKET COVER PAGE]

Contents of Supplement: Public comment email

Item(s)

Supplemental Information:

Any agenda related public documents received and distributed to a majority of the City Council after the Agenda Packet is printed are included in Supplemental Packets. Supplemental Packets are produced as needed. The Supplemental Packet is available for public inspection in the City Clerk's Office, 2600 Fresno Street, during normal business hours (main location pursuant to the Brown Act, G.C. 54957.5(2)). In addition, Supplemental Packets are available for public review at the City Council meeting in the City Council Chambers, 2600 Fresno Street. Supplemental Packets are also available on-line on the City Clerk's website.

Americans with Disabilities Act (ADA):

The meeting room is accessible to the physically disabled, and the services of a translator can be made available. Requests for additional accommodations for the disabled, sign language interpreters, assistive listening devices, or translators should be made one week prior to the meeting. Please call City Clerk's Office at 621-7650. Please keep the doorways,

Memo



455 Capitol Mall, Suite 300
Sacramento, CA 95814
916.444.7301

Date: April 8, 2024

To: Steven Martinez, City of Fresno

From: Jessica Babcock and Mike Parker, Ascent

Subject: Costco Commercial Center: Responses to Comments Received after Publication of the Final Environmental Impact Report

Costco has proposed a new commercial center that would replace the existing Shaw Avenue Costco warehouse location. The project would be located on an approximately 22-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. The development would include a warehouse building, gas station, and car wash.

The City has prepared an environmental impact report (EIR) to evaluate the potential effects of project implementation. The Draft EIR was released for public review on July 11, 2023. The City received 107 unique comment submittals 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 and the Final EIR was published in January 2024.

The City of Fresno has received 13 public comments related to the proposed Costco Commercial Center since publication of the Final EIR. This memo briefly summarizes the comments received and provides responses to address the concerns raised therein.

Andres Jauregui, California State University, Fresno

March 12, 2024

The comment requests data about the processing of Costco's development application to inform research into the effects that a separate Costco location in the City of Clovis had on commercial real estate prices in the area. The comment does not address the content, analysis, or conclusions in the EIR. No response is required on this issue pursuant to CEQA Guidelines Section 15088(a).

Autumn Simpson, Holiday Inn Express

March 6, 2024

The comment is a voicemail from the Holiday Express Inn regarding a proposition to serve as the "preferred hotel" for individuals that are temporarily in town due to work on the project. The comment does not address the content,

analysis, or conclusions in the EIR. No response is required on this issue pursuant to CEQA Guidelines Section 15088(a).

Cathy Caples

March 6, 2024

The comment expresses support for the project and suggests that nighttime truck traffic should access the site via North Arthur Avenue. 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. Refer to Response I5-1 in the Final EIR for further discussion.

Darrel Vincent

March 12, 2024

The comment expresses opposition to the project and concerns related to traffic 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. Refer to Responses I4-1 and I5-1 in the Final EIR for further discussion.

Renee Nealy

March 8, 2024

The comment expresses opposition to the project and concerns related to traffic congestion, including potential conflicts with existing bus stops and children walking to school. 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. Refer to Responses I4-1 and I5-1 in the Final EIR for further discussion. Note that the Central Unified School District has been consulted 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 correlates the four significant and unavoidable impacts identified in the EIR to safety concerns in the immediate neighborhood. The EIR identified significant and unavoidable impacts related to noise from construction because limited work could occur at night (Impact 3.11-1), vehicle miles traveled (VMT) because there would be a net increase in the amount people drive (Impact 3.13-2), safety hazards at the intersection of North Golden State Boulevard and West Herndon Avenue (1/3-mile southwest of the project site) due to a projected volume of traffic that exceeds the turn pockets (Impact 3.13-3), and due to the cumulative increase in VMT (Impact 4-13).

The comment suggests that the proposed Costco Commercial Center would increase the potential for unhoused individuals and thieves in the surrounding neighborhood and requests consideration of alternative sites in the El Paseo Marketplace. As discussed further in the Final EIR (see Response I4-1), CEQA does not include provisions for consideration of unhoused populations separate and distinct from the analysis of a project's impacts on the environment. 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. 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.

James Fleck

March 7, 2024

The comment expresses opposition to the project and concerns related to traffic congestion, noise, pollution, and lights. 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. In the Final EIR, 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 of the proposed project's impacts related to noise and lighting.

Joseph Lee

March 23, 2024

The comment asks when the project will be constructed. The comment does not address the content, analysis, or conclusions in the EIR. No response is required on this issue pursuant to CEQA Guidelines Section 15088(a).

Loretta Hanson

March 9, 2024

The comment expresses opposition to the project and concerns related to traffic congestion, including potential conflicts with existing bus stops and children walking to school. 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. Refer to Response I4-1 in the Final EIR for further discussion.

The comment suggests an alternate location near existing shopping centers and closer to SR 99. 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. 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.

Patricia Yaralian

March 6, 2024 (three emails) and March 7, 2024

The comment expresses opposition to the project and concerns related to traffic congestion, including potential conflicts with children walking to school. 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. Refer to Response I4-1 in the Final EIR for further discussion.

The comment also raises the potential inconveniences of construction and the potential to affect community character. The effects of construction are described throughout Chapter 3, "Environmental Impacts and Mitigation Measures," of the Draft EIR. The proposed project's potential to affect the existing visual character of the area is evaluated in Draft EIR Section 3.1, "Aesthetics" (Impact 3.1-1).

Sandra Velasquez

March 7, 2024 (voicemail and email)

The comment expresses opposition to the project and concerns related to traffic congestion and safety, including potential conflicts with existing bus stops and children walking to school. 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. Refer to Responses I4-1 and I5-1 in the Final EIR for further discussion.

Sehaj Sabharwal

March 28, 2024

This comment expressed interest in partnering with Costco to open a smog/mechanic shop. 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 does not address the content, analysis, or conclusions in the EIR. No response is required on this issue pursuant to CEQA Guidelines Section 15088(a).

Xavier Flores

February 27, 2024

The comment expresses concerns related to the completion of West Spruce Avenue north of the project site and traffic generated by the proposed project. 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. Refer to Response I15-1 in the Final EIR for information about the extension of Spruce Avenue adjacent to the northern boundary of the project site and anticipated effects on traffic patterns and Responses I4-1 and I5-1 in the Final EIR for further discussion of traffic and transportation effects in general.

Daniel Brannick

March 6, 2024

The comment expresses concerns related to land use, the relationship between greenhouse gas (GHG) emissions and transportation, and alternatives. The comment refers to previously submitted comments, which are addressed in the Final EIR (pages 2-160 through 2-175) and reiterates support for an alternate project location on Veterans Boulevard.

The comment provides an opinion that the GHG emissions impacts should be identified as significant and unavoidable in the EIR due to generation of VMT. The Draft EIR and Appendix F (the Greenhouse Gas Technical Report) fully evaluate and assess the potential for GHG impacts and, as part of that analysis, fully address the concern raised in the comment. Regarding the interplay between VMT and GHG, a significant VMT impact does not automatically equate to a significant GHG impact for multiple reasons. First, these are two distinct criteria to be specifically analyzed in two different EIR discussions (i.e., transportation and GHG); the VMT criteria was not intended, nor is it required, to be applied as suggested by the commenter. Second, while the City acknowledges that VMT is a variable and assumption used in the GHG analysis, the assessment of GHG includes an evaluation that considers emission factors based on the vehicle type and fuel type to arrive at an understanding of the GHG emissions. The GHG analysis in the Draft EIR properly discloses and acknowledges the VMT impact from the transportation section, and then analyzes the Project's GHG impact appropriately in the context of GHG emissions. Thus, the evaluation provided in the EIR is valid and recirculation of the Draft EIR is not required, pursuant to State CEQA Guidelines Section 15088.5.

The comment reiterates an opinion that the proposed MDO element of the Costco warehouse is inconsistent with the proposed zoning. As explained in Response I30-2 in the Final EIR, the City has determined that the MDO falls within the accessory use classification. As an accessory use to the retail warehouse, the MDO is allowable in the General Commercial designation.

The comment suggests that a transportation queuing analysis should be prepared for an offsite alternative to understand if significant and unavoidable queuing impacts could be avoided by relocating the proposed development. EIRs are required to describe and evaluate a range of reasonable alternatives to the proposed project that would feasibly attain most of the basic objectives of the project and would avoid or substantially lessen the significant effects of the project, and to evaluate the comparative merits of the alternatives (State CEQA Guidelines 15126.6[a]). The evaluation, analysis, and comparison with the proposed project that is provided in the EIR is conducted at a lesser level of detail than the evaluation for the project (State CEQA Guidelines 15126.6[d]). Preparation of transportation studies that include offsite intersection queuing analyses is outside the scope of a typical evaluation of alternatives. However, it can be reasonably surmised that any alternative location that is West of Golden State Boulevard and would be primarily accessed via SR 99 and Herndon Avenue could contribute to similar queuing effects at the North Golden State Boulevard/West Herndon Avenue intersection. There is also no evidence in the record that this location would reduce the potential for nighttime construction noise or generation of VMT. As explained in the Draft EIR, alternative project sites near Riverside Drive and Veterans Boulevard would also be near existing residences. Further, an EIR is not required to consider alternatives that are infeasible (State CEQA Guidelines 15126.6[a]). As explained in detail in Response I30-8 in the Final EIR, the alternative sites identified by the commenter were dismissed from detailed evaluation due to infeasibility. Thus, the evaluation provided in the EIR is valid and recirculation of the Draft EIR is not required, pursuant to State CEQA Guidelines Section 15088.5.

With respect to the scope of the transportation analysis conducted for the proposed project, the Transportation Impact Analysis (Appendix D to the Draft EIR) explains that future (2042) conditions were projected using the travel model developed by the Fresno Council of Governments. The transportation modeling for the cumulative scenario considers

regional volumes. Individual uses within shopping centers are not specifically modeled, but the traffic generation projections from the center overall would be captured in the model. The commenter's support for a mitigation measure that would prohibit development of the Costco Commercial Center Project until the California High Speed Rail Authority completes grade separation at West Herndon Avenue is noted. The Merced to Fresno portion of the California Highspeed Rail has been in development for a long time. The Final EIR for the project, which included this grade separation, was certified in May 2012. Continued construction is dependent on many factors, including on-going state funding. As explained further in Response I103-8 in the Final EIR, the City can only require mitigation that is feasible, which is defined as capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social, and technological factors (PRC 210610.1). The determination of feasibility and appropriateness is made in consideration of multiple factors, including the relative time for completion and the lead agencies authority over the project that would serve as mitigation. Therefore, although the City can reasonably expect that the significant and unavoidable queuing impact at the North Golden State Boulevard/West Herndon Avenue intersection may be eliminated in the future due to planned roadway improvements, the City does not believe this is a feasible mitigation requirement for the project at hand.

From: [Jose Valenzuela](#)
To: [Andres Jauregui](#)
Cc: [Steven Martinez](#)
Subject: RE: Research on Costco's relocation impact
Date: Wednesday, March 13, 2024 8:17:49 AM

Dr. Jauregui,

I have transferred out of the Planning and Development Dept. I am looping in Steven Martinez the current planner on the project. Please work with him moving forward.

Best,

Jose Valenzuela

Project Manager – Utilities and On-Site Project Management
Capital Projects Department

747 "R" Street, 2nd Floor

Fresno, CA 93721

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Direct Line: (559) 621-8830

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From: Andres Jauregui [REDACTED]
Sent: Tuesday, March 12, 2024 10:19 PM
To: Jose Valenzuela <Jose.Valenzuela@fresno.gov>
Subject: Research on Costco's relocation impact

External Email: Use caution with links and attachments

Hello Jose! This is AJ, real estate professor and Director of the Gazarian Real Estate Center at Fresno State. I hope this email finds you well!

I'm currently doing research on the impact of Costco's relocation in Clovis back in 2019. I'm looking at how the relocation impacted commercial land prices. I am presenting the preliminary research results at the American Real Estate

Society's annual conference in Orlando in two weeks. I have been working with Andrew Haussler from the City of Clovis to recreate the timeline of events.

I wanted to incorporate into the analysis the news about the relocation of the West Shaw Costco location in Fresno. I was wondering if you could provide me with a timeline of events, please? Of course, the location is not yet open, but I would assume that real estate prices have been already impacted by the news.

So far, I know that there was a notice of preparation of an EIR in October 2021, which was completed in July 2023. Is it possible to know when the Conditional Use Permit was submitted? I also believe the Planning Commission has already approved the CUP, but the City County is delaying voting on it.

I hope you can help me. This will definitely enrich the analysis and give us more accurate results. Please feel free to call my cell 334-332-9683 if you'd like to discuss this further.

I hope to hear from you soon.

Best regards,

AJ

Andres Jauregui, Ph.D.
Professor of Real Estate and Director
Gazarian Real Estate Center

Department of Finance, Real Estate, and Business Law
Craig School of Business
California State University, Fresno



From: [Erik Young](#)
To: [Steven Martinez](#)
Subject: FW: City of Fresno VM: Voice msg from DAY MAIN MENU 5592770004.
Date: Wednesday, March 6, 2024 9:52:11 AM
Attachments: [f2c1df20-4d75-4d61-ab31-02826e2e5955.WAV](#)

Hey Steven,

I received the attached voicemail this morning pertaining to your Costco. Do you mind following up with Autumn when you have a chance?

Erik Young | Supervising Planner
Current Planning | Planning & Development
2600 Fresno Street | Fresno CA 93721
559.621.8009
Erik.Young@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: voicemail@fresno.gov <voicemail@fresno.gov>
Sent: Wednesday, March 6, 2024 8:59 AM
To: Erik Young <Erik.Young@fresno.gov>
Subject: City of Fresno VM: Voice msg from DAY MAIN MENU 5592770004.

Please call (559) 621-7200 to listen to your messages over the telephone.

From: [PublicCommentsPlanning](#)
To: [Steven Martinez](#)
Cc: [Phillip Siegrist](#)
Subject: FW: Agenda item 24-245 new Costco
Date: Wednesday, March 6, 2024 4:22:49 PM

FYI

Rob Holt | Supervising Planner
Current Planning | Planning & Development
2600 Fresno Street | Fresno CA 93721
559.621.8056
Robert.Holt@Fresno.gov

Resources: Planning & Development | GIS Data Hub | Citywide Development Code
Accela Citizens Access (ACA) | ACA "How To" Videos

-----Original Message-----

From: Cathy Caples [REDACTED]
Sent: Wednesday, March 06, 2024 4:12 PM
To: PublicCommentsPlanning <PublicCommentsPlanning@fresno.gov>
Subject: Agenda item 24-245 new Costco

External Email: Use caution with links and attachments

This letter is in support of building a new Costco on Herndon across from El Paseo. This mixed use area of NW Fresno was planned before houses were built across the street. I'm sorry the builder did not inform buyers that there would be retail across the street. With 40% of Fresno's population members of Costco, it's only fair to build Costco in all sectors of Fresno so that every member has access to all products. With easy access from new Veteran's Blvd, this Costco will serve the entire west side until Costco decides to build another store in Southeast or West. I do believe to support the residents, truck traffic should not have during sleeping hours unless there is an entrance for the trucks from Herndon on the Derek's Mini Storage side of the building. But minor changes shouldn't prevent building.

Thank you
Cathy Caples

Sent from my iPhone

From: [Darrell Vincent](#)
To: [PublicCommentsPlanning](#); [PublicCommentsPlanning](#)
Cc: [Steven Martinez](#)
Subject: Oppose the new Costco
Date: Tuesday, March 12, 2024 11:59:00 AM

External Email: Use caution with links and attachments

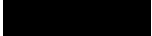
Hello City Councilman Mike Karbassi,

I am sending you this message to strongly urge you to oppose the new build of Costco in Northwest Fresno. Marketplace at El Paseo is an already busy area with somewhat manageable traffic. If a Costco is built there this will create a huge traffic congestion. People who live in the surrounding areas, myself included, do not want to detour or sit in traffic just to get home after a long day of work. I am sure that a lot of the people in these neighborhoods would agree.

Why does Fresno want to build another Costco in North Fresno when there are already two (Shaw and Abby)? Costco should be built in a commercial area in South Fresno where it could be more accessible to the rest of the community and away from residences in an already busy area.

Thank you for your time.

Respectfully,
Darrell Vincent



From: [Alyssa Stevens](#)
To: [Steven Martinez](#)
Subject: FW: Northwest Costco
Date: Friday, March 8, 2024 1:27:51 PM
Attachments: [image001.png](#)

Hi Steven:

We received this e-mail, I just wanted to forward this so it is included in the public record for the project.

Thank you so much!! Our office super appreciates your work on this item!!



Alyssa Stevens
Chief of Staff
Council Vice President Mike Karbassi
559-621-8000

From: Renee Nealy [REDACTED]
Sent: Friday, March 8, 2024 1:22 PM
To: Mike Karbassi [REDACTED]
Cc: Nelson Esparza [REDACTED]; Annalisa Perea [REDACTED]
Tyler Maxwell [REDACTED]; Luis Chavez [REDACTED]; Garry Bredefeld
[REDACTED]
Subject: Northwest Costco

External Email: Use caution with links and attachments

We live in the neighborhood where the proposed Costco is being considered to be built and have lived in our neighborhood for 18 years. **We are vehemently opposed to having a Costco literally in the middle of our neighborhood!!** The proposed new Costco will be across the street from an elementary school and middle school. In the mornings and in the afternoon there are several kids waiting for the school bus and there are many school buses along the streets picking up kids for school and dropping them off after school. The amount of traffic and congestion that this Costco will bring to our neighborhood will be

unprecedented! It is already congested with school buses and traffic with people traveling to work. The Environmental Impact Report cited four unavoidable impacts, which include an increase in construction noise and the most important of overall transportation impacts. It will not be safe for the children living in our neighborhood traveling to and from school; they have to walk to the bus stops in the morning and walk home from the bus stops in the afternoon. It is not safe for our children due to the increase in traffic this Costco will cause!

The neighborhood is quiet and safe; having the Costco at the proposed site will bring unwanted homeless people and thieves wandering into our neighborhood.

Why can't the Costco be built on one of the many empty fields near the Marketplace at El Paseo on Riverside Drive; that seems more like an optimal location near the shopping center instead of in the middle of a neighborhood.

Please reconsider moving the Costco to a more industrial or commercial area, not in a neighborhood!!

From: [Planning](#)
To: [Steven Martinez](#)
Cc: [PublicCommentsPlanning](#)
Subject: FW: Costco in NW Fresno Disapproval
Date: Thursday, March 7, 2024 1:48:13 PM

Pam Mariano | Administrative Clerk II
Planning & Development Department
2600 Fresno Street | Fresno CA 93721
559.621.8487
Pamela.Mariano@Fresno.gov



Resources: [Planning & Development](#) | [GIS Data Hub](#) | [Citywide Development Code](#)
[Accela Citizens Access \(ACA\)](#) | [ACA "How To" Videos](#)

From: James Fleck [REDACTED]
Sent: Thursday, March 7, 2024 12:59 PM
To: Planning <Planning@fresno.gov>
Subject: Costco in NW Fresno Disapproval

External Email: Use caution with links and attachments

I'm writing this to inform the council of my disapproval of the Costco project in NW Fresno for many reasons. First, the huge increase in traffic in the area, which is already congested most of the day because of the new strip mall in the same location. The access to the homes that now exist across the street will be compromised, along with the constant noise, pollution, and lights that will degrade the environment even more. What about access to the Golf Course? The increase in noise, pollution, lights and traffic congestion to name a few of my concerns is why I disapprove of "The world's Largest Costco" being located at the proposed site.

Life long resident of NW Fresno, Thank You, James Fleck

From: [Joseph Lee](#)
To: [Jose Valenzuela](#)
Subject: largest Costco built
Date: Saturday, March 23, 2024 2:14:13 PM

External Email: Use caution with links and attachments

When is the largest size Costco being built in the city of Fresno?

- Joseph Lee

From: [Loretta Hanson](#)
To: [PublicCommentsPlanning](#)
Cc: [Steven Martinez](#)
Subject: Costco
Date: Saturday, March 9, 2024 11:59:36 AM

External Email: Use caution with links and attachments

Please vote against the Costco moving to Herndon and Riverside Drive. It will create such a mess in our neighborhood!! It is too close to homes and the traffic will be out of control. Seems like properties farther south on Riverside Drive next to the shopping center and Highway 99 would be much more accessible and appropriate

Loretta Hanson

Sent from my iPhone

From: [Jose Valenzuela](#)
To: [Steven Martinez](#)
Cc: [Phillip Siegrist](#)
Subject: FW: Costco Proposal Thursday Meeting
Date: Wednesday, March 6, 2024 8:13:50 AM

FYI.

Jose Valenzuela

Project Manager – Utilities and On-Site Project Management

Capital Projects Department

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From: Patricia Yaralian [REDACTED]
Sent: Wednesday, March 6, 2024 2:05 AM
To: Jose Valenzuela <Jose.Valenzuela@fresno.gov>
Subject: Costco Proposal Thursday Meeting

External Email: Use caution with links and attachments

Greetings Mr. Valenzuela,

I just have the hardest time understanding the mentality of Fresno's leadership as I once again am writing to voice my disapproval of the proposed location of a new Costco site on Herndon and 99.

Traffic congestion and safety of the local school children are my main concerns. I drive eastbound to work on Herndon and I assure you that the traffic is already chaotic. I'm sad for the people that live in the area and the fact Fresno planners think a new Costco will be a healthy addition to the area.

Gas stations, 24/7 truck deliveries, and people migration from nearby towns to shop is not a nice thing to FORCE on residents and commuters in that area. There is a very busy train track to contend with also. The freight trains are long and slow along Golden State Boulevard. Traffic backup is comparable to the starting line of a drag race. It's madness...come on. REALLY?

Mental health of Fresno residents should be a top priority. This proposed Costco site and the years of development disruption doesn't support a healthy environment. We have had to endure High

Speed Rail, Veterans Boulevard and El Paseo Shopping Center construction. We have lost our hometown feel. No one belongs anymore. I mourn.

Please share my concerns against this plan at Thursday's meeting. And please feel free to contact me IF my voice will matter. That's a BIG "IF".

Thank you.

Regretfully,

Pat Yaralian

A solid black rectangular box used to redact the signature of Pat Yaralian.

From: [Jose Valenzuela](#)
To: [Steven Martinez](#)
Cc: [Phillip Siegrist](#)
Subject: FW: Costco proposal Thursday Meeting
Date: Wednesday, March 6, 2024 8:13:30 AM

FYI.

Jose Valenzuela

Project Manager – Utilities and On-Site Project Management
Capital Projects Department
747 "R" Street, 2nd Floor
Fresno, CA 93721
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Direct Line: (559) 621-8830

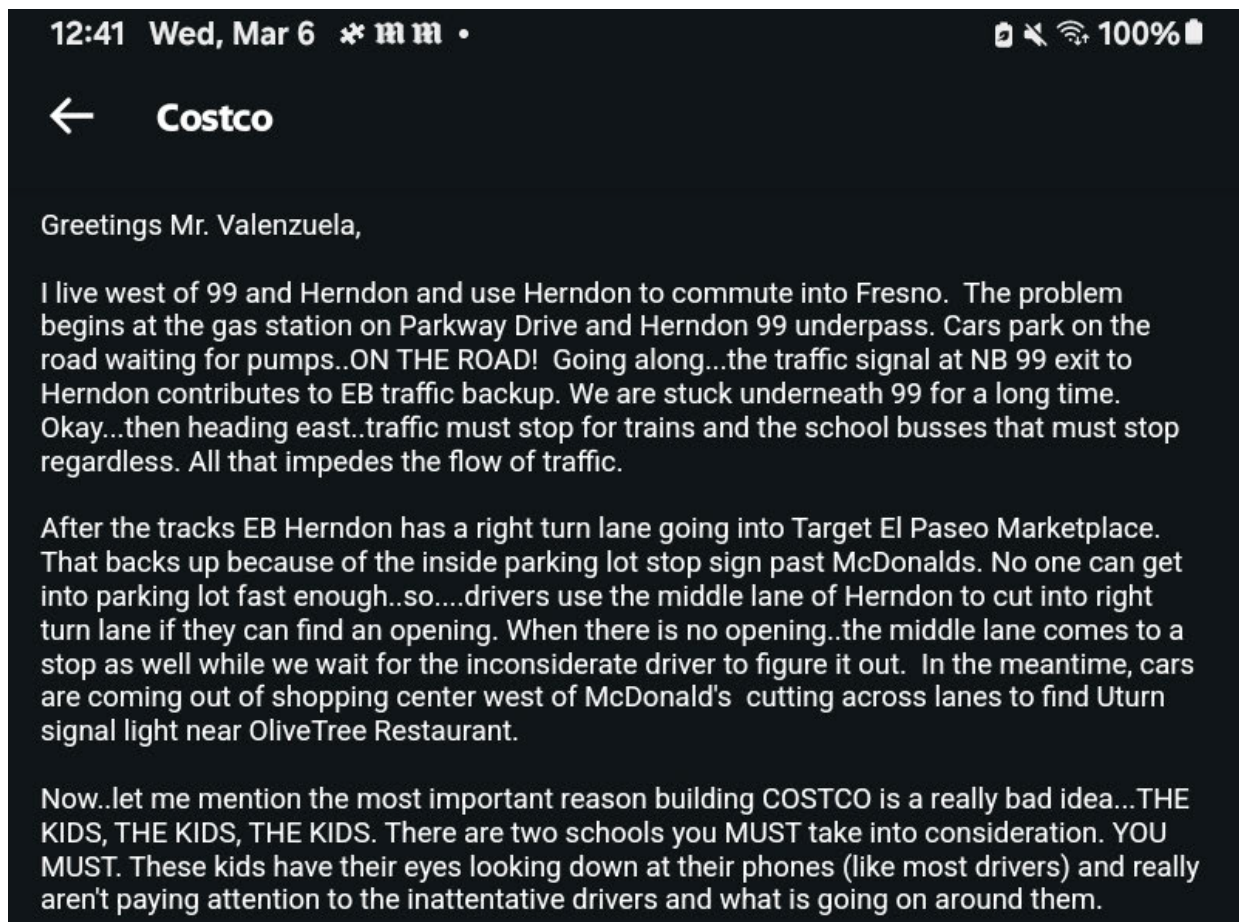
www.fresno.gov

Building a Better Fresno



From: Patricia Yaralian [REDACTED]
Sent: Wednesday, March 6, 2024 12:44 AM
To: Jose Valenzuela <Jose.Valenzuela@fresno.gov>
Subject: Costco proposal Thursday Meeting

External Email: Use caution with links and attachments



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.

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



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12:41 Wed, Mar 6 * m m •

100% battery



Costco

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

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 losing its IDENTITY. It's just a wannabe (gonnabe) large city sprawling out of control. And it is out of control. Already. Stop the MADNESS.

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Sincerely,

Pat Yaralian



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More



From: [Patricia Yaralian](#)
To: [Steven Martinez](#)
Cc: [Phillip Siegrist](#)
Subject: Costco Plan Herndon/99
Date: Wednesday, March 6, 2024 3:01:11 PM

External Email: Use caution with links and attachments


Good Afternoon Gentlemen,

Please check your email from prior plan manager Jose Valenzuela to read my disapproval (2) emails of planned Costco sight. Due to lack of my knowledge, I was unaware you are the new contacts.

I worked hard writing my concerns in regards to this project. Please take the time to read them and to fairly present them at the meeting tomorrow night.

Feel free to contact me if you have any questions or concerns.

Thank you.

Patricia Yaralian


From: [Patricia Yaralian](#)
To: [Steven Martinez](#)
Subject: RE: Costco Plan Herndon/99
Date: Thursday, March 7, 2024 3:17:20 PM

External Email: Use caution with links and attachments

I just was informed the project has been temporarily put on hold. I can't express my relief enough. It just might help renew my faith in Fresno leadership. Thank you for sharing my concerns. It means alot because we were listened to and heard. Patricia

[Yahoo Mail: Search, Organize, Conquer](#)

On Thu, Mar 7, 2024 at 2:57 PM, Steven Martinez
<Steven.Martinez@fresno.gov> wrote:

Greetings,

Thank you for the submission of your comment. The comment has been added to the administrative record for review.

Thank You.

Steven Martinez | Planner

Current Planning | Planning & Development

2600 Fresno Street | Fresno CA 93721

559.621.8047

Steven.Martinez@Fresno.gov



From: Patricia Yaralian [REDACTED]

Sent: Wednesday, March 6, 2024 3:01 PM
To: Steven Martinez <Steven.Martinez@fresno.gov>
Cc: Phillip Siegrist <Phillip.Siegrist@fresno.gov>
Subject: Costco Plan Herndon/99

External Email: Use caution with links and attachments

Good Afternoon Gentlemen,

Please check your email from prior plan manager Jose Valenzuela to read my disapproval (2) emails of planned Costco sight. Due to lack of my knowledge, I was unaware you are the new contacts.

I worked hard writing my concerns in regards to this project. Please take the time to read them and to fairly present them at the meeting tomorrow night.

Feel free to contact me if you have any questions or concerns.

Thank you.

Patricia Yaralian



From: [Steven Martinez](#)
To: [REDACTED]
Cc: [PublicCommentsPlanning](#)
Subject: RE: Planning and development of proposed new NEW Fresno Costco
Date: Thursday, March 7, 2024 5:20:51 PM
Attachments: [78153da7-1fa4-43f0-97d1-f21b6395d7af.WAV](#)

Greetings,

Thank you for the submission of your comments. The comments has been added to the administrative record for review.

In Public Service,
Steven Martinez | Planner
Current Planning | Planning & Development
2600 Fresno Street | Fresno CA 93721
559.621.8047
Steven.Martinez@Fresno.gov



From: Sandra Velazquez [REDACTED]
Sent: Thursday, March 7, 2024 4:20 PM
To: OCC Customer Service [REDACTED]
[REDACTED] new NEW Fresno Costco

External Email: Use caution with links and attachments

First Name	Sandra
Last Name	Velazquez
Email	[REDACTED]
Phone Number	[REDACTED]
Subject	Planning and development of proposed new NEW Fresno Costco
Message	Hi I live in the neighborhood of the proposed Costco and am very concerned About it being built. As it is I already feel it's very congested with the new veterans blvd abd shopping center, I've lived in the area for 22 years and I miss the quiet

neighborhood I once had. Please don't let it be built im against it

IP Address	107.77.213.56
User-Agent (Browser/OS)	Apple Safari 17.3.1 / OS X
Referrer	https://www.fresno.gov/contact/

From: [Jose Valenzuela](#)
To: [Steven Martinez](#)
Subject: FW: Smog shop @ Costco
Date: Thursday, March 28, 2024 11:15:41 AM

Steven,

For your reference.

Thank you,

Jose Valenzuela

Project Manager – Utilities and On-Site Project Management
Capital Projects Department

747 "R" Street, 2nd Floor

Fresno, CA 93721

Main Office: (559) 621-8880

Direct Line: (559) 621-8830

www.fresno.gov

Building a Better Fresno



From: Sehaj Sabharwal [REDACTED]
Sent: Thursday, March 28, 2024 10:59 AM
To: Jose Valenzuela <Jose.Valenzuela@fresno.gov>
Subject: Smog shop @ Costco

External Email: Use caution with links and attachments

Hi Jose,

We are interested to collaborate with you in opening a Smog shop/machanic shop in the New comming **Costco site**.

You are going to have a Carwash, Tire shop the only thing you are missing is a **Smog/machanic shop**.

It would also help in bringing more people and we would give every customer a 5 star customer experience.

My Uncle has its own workshop from the past **20+ years**. With that experience and customer satisfaction sky I'd the limit

We can put more downpayment to.
Please let me know.

Appreciate
Sage

From: [Steven Martinez](#)
To: [Xavier Flores](#); [PublicCommentsPlanning](#)
Subject: RE: costco on herndon
Date: Tuesday, February 27, 2024 1:40:04 PM

Greetings.

Thank you for the submission of your comment. It will be added to the administrative record for review.

As far as Spruce Avenue:

Currently Spruce terminates at two intersections: Spruce Avenue and Riverside Drive; Spruce Avenue and Strother Avenue. Spruce does not have a segment across the project site. The applicant (Costco) will extend and enhance West Spruce Avenue from North Riverside Drive to the intersection with North Sandrini Avenue. The connection will be consistent with the City of Fresno Active Transportation Plan. The asphalt roadway will include curb, gutter, sidewalk, Class II bicycle facilities, and streetlights.

Thank You.

Steven Martinez | Planner

Current Planning | Planning & Development

2600 Fresno Street | Fresno CA 93721

559.621.8047

Steven.Martinez@Fresno.gov



From: Xavier Flores [REDACTED]
Sent: Tuesday, February 27, 2024 1:33 PM
To: [PublicCommentsPlanning](#) <PublicCommentsPlanning@fresno.gov>
Cc: Steven Martinez <Steven.Martinez@fresno.gov>
Subject: costco on herndon

External Email: Use caution with links and attachments

Hello , I've been a resident off of Spruce and Hayes since 1993 and after looking at the map and roads going in and out of that Costco its a big concern if you open that dead end at Spruce. That's if I am reading it right !

The amount of folks and kids on Spruce everyday along with the elderly that are on there power chairs, the traffic from Costco is gonna destroy our neighborhood , School buses also

picking up and dropping off kids on Spruce is another issue.

I am all in for New Business in Fresno but not at the expense of losing our peaceful setting, that neighborhood has been a Great place to live and raise a family.

Hoping for the best for us all ,

Xavier Flores



Steven Martinez, Planner
City of Fresno
2600 Fresno Street, Third Floor, Room 3043
Fresno, CA 93721

Subject: Costco Commercial Center Project (CEQA State Clearinghouse # 2021100443)
Response to Final EIR Information and Comments

Dear Mr. Martinez,

Presented in this letter are comments addressing the Response to Comments and other information provided as part of the Final EIR for the proposed Costco Commercial Center Project. The comments are organized into essentially the same three topic areas from my DEIR comment letter, which are:

- 1) *Comments regarding inconsistency between the operational characteristics identified in the proposed project description and the uses allowed by the proposed General Plan Amendment and Rezone.*
- 2) *Comments addressing issues and deficiencies in the analysis of specific categories of environmental effects (For this letter, the comments are particularly focused on Greenhouse Gas Emissions and Transportation impacts).*
- 3) *Comments on the adequacy of the Draft EIR's Alternatives analysis.*

I appreciate that at least some information was provided in the Final EIR which helped provide clarity on the content and analysis from the DEIR. However, as I stated during my public comments in opposition to the proposed project at its Planning Commission hearing, "Responses are not always answers." The zoning consistency issue has not been resolved, and inadequacies in the environmental analysis persist. Some of these issues and inadequacies pertain to environmental planning and CEQA topics that are particularly technical in nature, while others involve issues that are plainly recognized – such as those related to the transportation and safety concerns expressed in numerous DEIR comments.

The comments presented in this letter are primarily intended to refer back to issues that have already been raised where additional discussion is appropriate, but a portion of the comments also address information that was discovered months after the DEIR review and comment period was completed. I mention this because I do not want these comments to be characterized as a "last-minute document dump" (and I should note I have been on the other side of that situation).

I want to reiterate 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. I sincerely believe that developing the proposed Costco project at a nearby alternative site such as at Veterans Boulevard would have an equal or superior overall outcome for the City, its residents, and Costco itself. Every benefit sought by the proposed relocation of the west Shaw Costco would be either fully or substantially realized. At the same time, a number of significant negative externalities to surrounding residents would be avoided (such as noise and traffic safety issues in neighborhoods), and being located at a major roadway that is already grade-separated will reduce or avoid transportation safety issues as well as operational challenges that are

likely to arise (both in the near-term while Herndon is not grade-separated and in the intermediate period when Herndon undergoes construction to become grade-separated).

I am also well aware that there is motivation to simply get this project completed and operational at the proposed site despite its drawbacks so that the benefits of the project can be realized sooner rather than later. I would also generally prefer that outcome, but not at the expense of an inadequate evaluative process.

Short of developing the project at a different location, this is what I believe should be done:

- The EIR should be recirculated in order to properly identify and disclose that the project will result in a significant and unavoidable impact regarding GHG emissions, in particular because information in the EIR (despite presenting a conclusion otherwise) demonstrates that the project will conflict with existing GHG emissions plans, policies, and regulations due to its high levels of Vehicle Miles Traveled (VMT) in excess of the thresholds identified in the City's VMT Guidelines.
- Along with/as part of the process of recirculating the EIR, the land use application and project description should be revised to include a GPA and Rezone that is consistent with all of the proposed uses included as part of the project (particularly the MDO/Last Mile Delivery facility). Alternatively, the project component triggering the conflict with the currently proposed Land Use and Zoning designations (the MDO/Last Mile Delivery facility) could be removed from the project.
- As part of the process of recirculating the EIR, the Alternatives analysis should be revised to more precisely evaluate at least one of the alternative sites identified in the DEIR comments (either in my comments or other comments). Specifically, a transportation queuing analysis should be prepared so that the proposed project's significant and unavoidable queuing impacts can be adequately and meaningfully contextualized (i.e., to provide understanding of whether the queuing impacts are especially site-specific and could be avoided by developing the project at another site, or if significant and unavoidable queuing impacts would still be likely to occur if the project was developed elsewhere in the vicinity).

I appreciate your consideration of these comments and their inclusion in the record.

Sincerely,

Daniel Brannick

1. Comments regarding inconsistency between the operational characteristics identified in the proposed project description and the uses allowed by the proposed General Plan Amendment and Rezone.

Response I103-2 presents additional information about the details of the proposed Market Delivery Operation (“MDO”) component of the project (also referred to at times as a “Last Mile Delivery” facility in project documents and during public meetings). The response indicates that the City determined the MDO/Last Mile Delivery component falls within the accessory use classification (i.e., an accessory to the large-format retail Costco store). The response also provides further details about how the MDO/Last Mile Delivery facility will be related to and complement operation of the large-format retail portion of the proposed Costco project.

The information provided in the response does not resolve the issue of whether the Development Code was properly applied, primarily because it ignores or sidesteps consideration whether the MDO/Last Mile Facility component of the project is already defined and regulated in the Development Code.

As mentioned in earlier comments, the proposed MDO/Last Mile Delivery facility falls under the definition of what the City of Fresno’s Development Code defines as a “Warehousing, Storage, and Distribution” use (hereafter abbreviated as “WSD”). The definition from the Development Code is as follows:

Warehousing, Storage, and Distribution. *Storage and distribution facilities without sales to the public on-site or direct public access except for public storage in small individual spaces exclusively and directly accessible to specific tenants.*

The MDO fits this definition because it will be used for storage and distribution, and it will not offer direct public access or be used for public on-site sales. See text below for reference:

“... 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.” (DEIR, p. 2-13)

As also previously mentioned, the Development Code lists several sub-types of WSD uses (see Section 15-6705), including “Indoor Warehousing and Storage” and “Wholesaling and Distribution”, and the proposed MDO/Last Mile Delivery Facility falls under the definition of these sub-types.

It is also noted that WSD uses are listed under the “Industrial Use Classifications” in 15-6705 rather than “Commercial Use Classifications” in 15-6704. The only type of WSD use allowed in Commercial Zone Districts is Personal (Mini) Storage. While there is one type of WSD allowed in Commercial districts, the fact that WSD uses are listed under the “Industrial Use Classifications” rather than “Commercial Use Classifications” implies that the Development Code considers such uses to be predominantly industrial in nature.

As demonstrated here and in earlier comments, the MDO/Last Mile Delivery facility is not some special undefined or previously un contemplated use but rather one that is already defined in the

code and a type of which already exists locally. The Amazon warehouse located near SR-180 and Clovis Avenue in the City of Fresno is an example of a last-mile delivery facility use. The site of that facility (APN 456-030-56) is zoned Light Industrial, which is both consistent with the Development Code and reflective of the physical/operational nature of that use. Even if the footprint of the project's proposed MDO/Last Mile Delivery facility is not as large as a typical standalone last-mile facility, the use is still the use.

To further illustrate this point, I would like to call attention to the treatment of the Car Wash component of the subject project. According to information presented by both the Applicant's representatives and City staff in presentations, the inclusion of the GPA and Rezone as part of the project's application for entitlements was necessary to allow the development of the Car Wash. Specifically, the Car Wash was not a permitted use (either by-right or through a CUP) in the existing "Community Commercial" ("CC") zone district, thus the project application includes a GPA and Rezone to the "Commercial General" ("CG") zone district which conditionally allows for development of a Car Wash.

If the Car Wash cannot be considered an "accessory use", then the MDO/Last Mile Delivery facility similarly cannot be considered an "accessory use". The Applicants' public statements and the Response to Comments have gone to great length to highlight details about operational synergies and similar advantages between the MDO/Last Mile Delivery facility and the large-format retail store. Many of the same points could be raised about the Car Wash and the store. After all, offering car washes alongside the large-format retail store would also likely be considered a reflection of "members' evolving shopping patterns and demands."

Even though the Car Wash's footprint would be relatively small compared to the size of the large-format retail building and parking areas, and its operation would be subordinate to that of the retail store area, the GPA and Rezone is required because *the use is still the use*.

Further, in case it needs to be stated, the absence of WSD uses other than "Personal Storage" from the Use Table reflects that they are prohibited from all Commercial zone districts. "Personal Storage" is the only WSD use listed because it is the only such use allowed in at least some of the Commercial zone districts. When a use is prohibited from all districts listed under a zoning category, it is not listed in the table with all dashes ('-') but rather is omitted entirely from the use table for that category. (For a visual reference, refer to Use Tables in the Citywide Development Code or which were attached to my DEIR comment letter.)

As an example, if I wanted to open an auto dealership at my residence and went to the City for a zone clearance, I would presumably be denied because auto dealerships are not allowed in Residential designations. While the Use Table for Residential Districts does not expressly list auto dealerships as a prohibited use, it is their complete absence from the Use Table for Residential Districts which indicates they are not allowed uses in that district.

The Applicant's representatives mentioned on at least one occasion that the proposed MDO/Last Mile Delivery facility was added to the project after the land use application was initially submitted to the City. This would at least partially explain why the proposed Land Use and Zoning associated with the project application does not align with inclusion of the MDO/Last Mile Delivery facility. Whether the inconsistency has persisted due to an oversight or a more intentional decision to carry

on contrary to the provisions of the Development Code, it is not appropriate for the project to be able to skip directly to a “Director’s Determination” and shoehorn the MDO/Last Mile Delivery facility component into the prior application when doing so means it no longer conforms to the underlying land use and zoning designation.

The fact of the matter is that the MDO/Last-Mile Delivery facility use is one that is expressly defined in the Development Code 15-6705 among the list of Industrial Use Classifications. Since the Development Code lists the use in question, Section 15-5020 is not triggered. Such uses are only listed under the Use Table for Employment Districts (Table 15-1302). The only type of WSD use listed at all in the Use Table for Commercial Districts (Table 15-1202) is Personal Storage, and the MDO/Last Mile Delivery facility is absolutely not that.

By proceeding in this manner, adoption of the project would be in conflict with the zoning regulations set forth in the City’s Development Code. It raises questions about the overall integrity of the City’s planning and development processes. It also sets an unsettling precedent of the City allowing logistics and warehousing uses in areas designated for Commercial use when those uses are absent from the Use Table and thus should be considered excluded from/not allowed in Commercial Districts.

As indicated in my DEIR comments (and not challenged in the Response to Comments), there would not be a consistency issue present if the subject land use application involved a GPA and Rezone to one of the “Employment” designations (e.g., “Employment – Light Industrial”). Therefore, to remedy the zoning inconsistency, the land use application and project description should be revised to include a GPA and Rezone that is consistent with all of the proposed uses included as part of the project (particularly the MDO/Last Mile Delivery facility). Alternatively, the project component triggering the conflict with the currently proposed Land Use and Zoning designations (the MDO/Last Mile Delivery facility) could be removed from the project so that it is consistent with CG zoning.

2. *Comments addressing issues and deficiencies in the analysis of specific categories of environmental effects.*

Part 2 of my Draft EIR comments raised questions and expressed concerns regarding the analysis of several categories of environmental effects in the DEIR. Responses I103-3 through I103-7 address the comments in Part 2 of my DEIR comment letter. The comments here are focused on Transportation and Greenhouse Gas Emissions impacts.

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. The comments here are related to the second impact (transportation safety).

Response I103-7 provides more detailed information concerning transportation queuing conditions and proposed improvements/measures that would help reduce potential risks, including risks related to the proximity of the railroad tracks that run parallel to Golden State Boulevard.

As emphasized elsewhere and in my DEIR comments, the project's transportation safety impacts remain significant and unavoidable, and it is highly likely that the adverse project impact is attributable to the specific site being proposed for development.

Regarding the fourth paragraph of the response, it is unclear whether this statement was intended to specifically rebut some aspects of the concerns raised or to better demonstrate the validity of the analysis. I just want to note that from a plain reading it appears to corroborate concerns that were identified related to project-related transportation activity on Herndon.

The fifth (and final) paragraph of this response states:

"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 [sic] 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."

First, it is slightly unclear whether the mention of "rail crossing improvements" mentioned in the last sentence refers to the full-on future grade separation of Herndon or to the rail crossing improvements mentioned earlier in this comment (e.g., "Do Not Block" signage and/or road paint).

Either way, the risks associated with vehicles being queued near the railroad tracks (not just train-to-vehicle but vehicle-to-vehicle and even vehicle-to-pedestrian) are regularly observed and experienced by people who travel along this segment of Herndon Avenue. When the subject traffic-safety queuing impacts occur, the effects will occur in this same segment, including where the railroad tracks are proximate. It should also be plainly evident how physically separating the roadway from directly interacting with the rail corridor would avoid or reduce said impacts.

To reiterate what was already stated in the DEIR comments, the deferral of development should not be considered infeasible or unreasonable given the precedent of Granville's Parc West residential project (a subdivision with 800+ homes on 160 acres), which required deferring the project's buildout until the completion of Veterans Boulevard (which like Herndon, entailed a roadway/grade-separation project undertaken to allow for HSR buildout) and a fire station to serve the area. Further, the timing of Veterans' construction was considerably affected by local budgetary and grant-seeking activities (i.e., initial delays due to de-prioritization of Measure C funding, and later advances due to the City applying for and being awarded federal transportation money). In other words, the same

general considerations apply to the Herndon grade separation, so it is not accurate to characterize the timing or completion as totally out of the control of local interests.

There are two additional items related to information which came up after the end of the DEIR comment period that I want to make sure are noted for the record:

1) During the community meeting held by the Applicant's representatives on February 2, 2024, at River Bluff Elementary School, a representative from Kittleson indicated that supplemental traffic analysis was either being conducted or had been completed during January 2024. However, no information regarding a supplemental traffic analysis or similar content appears to have been included as part of the Final EIR or available for public review. My primary concern is that if such information (assuming it does exist) is utilized or referenced as part of the ultimate decision to be made by City Council on the subject project, it absolutely would need to have been made available for public review for a reasonable amount of time ahead of the public hearing and decision.

2) Following submittal of my DEIR comment letter, I became aware that a Raisin' Canes drive-thru restaurant is under construction at the north end of the El Paseo shopping center. Raisin' Canes is among the class of drive-thru restaurants that are known for drawing large crowds and having especially long drive-thru lines.

While it appears that a substantial amount of drive-thru and parking space has been incorporated as part of the Raisin' Canes project, the concern here is that additional volume of traffic resulting from that new development (in combination with existing traffic from vehicles accessing El Paseo) could exacerbate an existing circulation bottleneck within El Paseo and lead to backups of vehicles attempting to enter El Paseo from eastbound Herndon Avenue using southbound Weber Avenue (the roadway that runs between the Raisin' Canes location and the McDonald's).

The "Weber Avenue-Weber Avenue" intersection inside El Paseo (about 350 feet south of Herndon) is Stop sign-controlled. The Target crosswalk area immediately south of this intersection is very active, so southbound cars are often waiting at the Stop sign (or just past it) while pedestrians cross to and from the entrance to Target. During high-volume times like holiday shopping days, one can see cars backed up from Weber onto Herndon Avenue.

Since Raisin' Canes appears to be imminently close to opening, I am very interested to see how this will play out – if it does result in backups onto Herndon (akin to the backups on west Shaw that were happening at the In-N-Out location, which is currently undergoing site renovation in order to address that issue), then it appears likely this condition will exacerbate the queuing-related transportation safety impacts of the Costco project (that is, the context in which the queuing impacts occur will be worse than expected). More specifically, if vehicles are queued out onto the far right lane of Herndon, it will reduce available space for eastbound thru-traffic on Herndon to navigate around the traffic queuing issues which the EIR indicates will occur in the vicinity of the project site.

From review of the DEIR, it appears that the development of new high-volume drive-thru restaurant uses like Raisin' Canes in the vicinity of the project site was not anticipated or considered as part of the EIR's analysis. If this type of development activity was accounted for, it would be appreciated if the Applicant's representatives and/or the City could clarify how so.

Greenhouse Gas Emissions

Response I103-5 addresses comments regarding GHG emissions and in particular purports to justify the EIR's differing significance determinations regarding the project's VMT-related transportation effects and its GHG emissions effects. This response here along with the determination regarding GHG Emissions impacts in the DEIR is simply baffling and infuriating. For reasons previously discussed in my DEIR comments, the determination that the project will have significant and unavoidable VMT-related impacts while having no significant impact regarding GHG emissions is irreconcilable.

The following additional comments are intended to further clarify the comments previously presented in my DEIR comment letter:

- 1) Conflicts and inconsistencies attributable to the project's VMT in excess of established thresholds are already identified in the EIR and its GHG Appendix (see attached pages at the end of this letter). In addition to the very direct inconsistency with Item 1(h) in the GHGRP checklist, the overall amount of references made to VMT in the consistency checklists is very demonstrative at a holistic level of how significant and important reducing VMT is to reducing GHG emissions and achieving climate goals. It is also noted that the consistency analysis seems to arbitrarily imply that the consistency items are all of equal weight and that inconsistency/conflict with an item can be offset simply by demonstrating consistency with a majority of other items. This line of apples-to-oranges reasoning is improper.
- 2) While the CEQA Guidelines Appendix G Checklist is organized such that 15061.4(b) (which was implemented by SB 743) is directly presented in the list of questions for Transportation impacts, SB 743 and the policies and regulations implemented via its adoption are absolutely about GHG emissions. This is demonstrated by the fact that SB 743 is specifically identified and discussed in the DEIR's Regulatory Setting for the Greenhouse Gas Emissions section as well as in the Greenhouse Gas Emissions Technical Report (DEIR Appendix F). This should be viewed as a complete refutation of the narrow-minded assertion in the FEIR/Response to Comments that VMT in excess of threshold levels referenced by 15061.4(b) is somehow not also in conflict/inconsistent with applicable policy and regulations intended to reduce GHG emissions, and/or that this impact should only be looked at or called out as a "Transportation" impact because of how the Appendix G Checklist is organized. This project – a large-format Costco retail store featuring 36 gas pumps that largely deters or precludes low-VMT development in its proximity due to its inherent physical and operational characteristics – is an extremely apt example of the type of project which the enactment of SB 743 sought to target through its multifaceted aim which includes reducing GHG emissions through encouragement of infill development and a diversity of uses instead of sprawl.
- 3) In addition to failing to appropriately identify the significant and unavoidable impact as required by CEQA, the rationale and comments demonstrate what arguably amounts to an attempt to willfully confuse the meaning of and/or downplay the significance of the EIR's own significant-and-unavoidable determination regarding the project's threshold-exceeding VMT levels. The approach being taken in the EIR functionally serves to keep the project's VMT impacts in the realm of "technical minutiae" and cuts against the provision of adequate information to the public and fostering of meaningful public participation.

- 4) The comment below is meant to clean up a typo/omission from my DEIR comments, specifically in the parenthetical part of the comment.

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 CARB Scoping Plan that older plans not accounting for AB 1279 such as the City's GHGRP are actually now out of compliance.)

Again, CEQA does not ban projects with significant and unavoidable impacts from ultimately being carried out when there are compelling reasons to do so, and the range of legitimate reasons is broad and can be for non-environmentally-centric reasons. What CEQA does require though is disclosure of information in order to allow informed understanding and meaningful public participation.

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.

3. Comments on the Draft EIR's Alternatives analysis

Response I103-8 provided further information and discussion about why the consideration of alternative project sites would be infeasible and how the EIR has satisfied requirements for alternatives analysis under CEQA.

The response does not sufficiently refute the need for analyzing alternatives nor does it provide information amounting to substantial evidence that specified alternative locations (particularly those at Veterans) would be infeasible.

For reasons already discussed, the proposed alternative locations (specifically the two locations at Veterans) are substantially similar in terms of location, overall area, roadway access, physical site characteristics, etc. that they are capable of meeting most if not all of the identified project objectives. Potential constraints like the presence of the FMFCD easement are capable of being feasibly reconciled, which is demonstrated through observation of the amount of existing development in the area and in comparison to the types of constraint responses entailed in the project as currently proposed (e.g. constructing a long new private drive, redesignating a roadway).

Zoning and SB 330 considerations are not an issue at one or possibly both of the alternative sites on Veterans because the land is (or now appears to be) zoned for Light Industrial, which as explained previously would allow all project components to be developed (see attached GIS figure at the end of this letter; note the apparent revisions that have occurred or are underway at the proposed alternative site area south of Veterans).

The only notable distinctions are that the proposed alternative sites consist of multiple parcels (i.e., 2-3 parcels apiece) and they are not under the immediate control of the applicant. However, not only are the parcels for each area under common ownership, each of the areas was previously and is now actively being advertised as for sale (see site images with “For Sale” signs included at the end of this comment letter). Based on these factors, and given that Costco is a multi-billion dollar corporation and a highly sophisticated developer of property (and likely highly desirable to sellers), it is highly evident that the proponent would readily have the capacity to “reasonably acquire, control or otherwise have access to the alternative site.”

Two additional principles of CEQA to keep in mind: Alternatives are at the heart of the EIR’s analysis, and CEQA is interpreted broadly, as in “to be interpreted in such manner as to afford the fullest possible protection to the environment within the reasonable scope of the statutory language.”

While there could ultimately be justifiable reasons to pursue development of the proposed project at the proposed site rather than one of the proposed alternative sites, the analysis and rationale presented in the EIR (both the DEIR and FEIR/RTC) to justify excluding alternative sites from the EIR’s more comprehensive alternatives analysis is inadequate, arbitrary, and self-serving to a degree that aims to make approval of the project at proposed the site a forgone conclusion.

I want to note that my comment letter was one of 103 comments provided from 102 individuals in response to the DEIR. Of those, 50 comments (49 commentors) were in opposition to the project, 32 comments (32 commentors) were in favor of the project, and 21 comments (21 commentors) did not have a clear sentiment or were highly focused on a specific issue. While many of the comments in favor of the project identify how a new Costco can resolve site-specific issues at the existing Costco (e.g., constrained site capacity, traffic issues, safety issues), these comments offer less discussion and less specific detail about site-specific benefits (the ones that do mostly include comments indicating that the roads serving the proposed site will be able to handle traffic much better than Shaw Avenue, and that having a more northerly site would make it easier to reach for people traveling from places in far northwest Fresno and areas beyond such as Madera). In contrast, many of the comments in opposition to the project (including ones that express support for the general idea of a new Costco) identify site-specific issues and problems as the basis for opposing the project (e.g., concerns about things like air quality, noise, and traffic causing disproportionately adverse effects to the immediate area and community). Multiple comments submitted in response to the DEIR (along with comments presented during community meetings) questioned why this specific location was selected and offered suggestions of alternative sites or specified areas where the project could sensibly be developed and result in less community and environmental conflict. The sites identified included the vacant areas near Veterans Boulevard as well as areas further to the west, including the site where the former Klein’s Truck Stop was located (southwest corner of Herndon Avenue and Golden State Boulevard).

From this information, it legitimately seems that pursuing development of the project at a nearby alternative site could substantially address many of the concerns that are the basis of opposition while still providing the changes and outcomes that are the basis of public support for the project. This further reinforces that as a matter of public concern the Draft EIR should have included evaluation of an alternative site such as one of the proposed Veterans Boulevard locations 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.

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	<p>Encourage and prioritize full, fair, and equitable participation by all affected communities in transportation decision-making and planning processes.</p> <p>Actively work to ensure equitable distribution of the benefits and burdens of transportation projects.</p> <p>Promote the improvement and expansion of accessible transportation options to serve the needs of all people, especially those who have historically faced disproportionate transportation burdens.</p>	<p>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 transportation options. Project's location will be in close proximity to existing transit facilities as part of the project, and will be located in close proximity to transit stops (e.g., NW Herndon-Hayes transit stop).</p>
2	Vibrant communities that are accessible by sustainable transportation options	<p>Encourage alternatives to single-occupancy vehicles that reduce vehicle miles traveled (VMT) and greenhouse gas emissions.</p> <p>Support investment in and promotion of active transportation and transit to improve public health and mobility, especially in historically underinvested areas.</p> <p>Encourage sustainable development that focuses growth near activity centers and mobility options that achieve greater location efficiency.</p> <p>Support local jurisdictions' efforts to minimize the loss of farmland, environmentally sensitive areas, and natural resources</p> <p>Support local jurisdictions' efforts to facilitate the development of diverse housing choices for all income groups.</p> <p>Facilitate and promote interagency coordination and consistency across planning efforts.</p> <p>Treat justice and support efforts to improve air quality and minimize pollutants from transportation.</p>	<p>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.</p> <p>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.</p>
3	A safe, well-maintained, efficient, and climate-resilient multimodal transportation network	<p>Prioritize investment in and promote multimodal safety measures to reduce traffic fatalities and incidents in the region.</p> <p>Promote enhanced Transportation Systems Management (TSM) and Transportation Demand Management (TDM) strategies to reduce congestion and vehicle miles traveled.</p> <p>Encourage improvements in travel connections across all modes to create an integrated, accessible, and seamless transportation network.</p> <p>Maximize the cost-effectiveness of transportation improvements.</p> <p>Encourage investments that increase the system's resilience to extreme weather events, natural disasters, and pandemics.</p> <p>Preserve and maintain existing multimodal transportation assets in a state of good repair</p> <p>Support local and regional economic development by leveraging planning and transportation funds that foster public and private investment.</p> <p>Facilitate efficient, reliable, resilient, and sustainable goods movement.</p> <p>Support innovative mobility solutions that are accessible, affordable, reduce greenhouse gas emissions, and improve air quality.</p> <p>Support efforts to expand broadband access throughout the region.</p>	<p>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.</p> <p>The Project plans to encourage commute trip reduction through a variety of strategies. The Project will encourage carpooling, transit, and other modes of travel. The Project will also provide bicycle storage and locker rooms for employees who like to work. This will reduce the employee VMT and provide incentives for employees to commute to work alternative ways.</p> <p>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.</p>
4	A transportation network that supports a sustainable and vibrant economy	<p>Preserve and maintain existing multimodal transportation assets in a state of good repair</p> <p>Support local and regional economic development by leveraging planning and transportation funds that foster public and private investment.</p> <p>Facilitate efficient, reliable, resilient, and sustainable goods movement.</p>	<p>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.</p>
5	A region embracing clean transportation, technology, and innovation	<p>Support innovative mobility solutions that are accessible, affordable, reduce greenhouse gas emissions, and improve air quality.</p> <p>Support efforts to expand broadband access throughout the region.</p>	<p>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.</p> <p>Not Applicable.</p>

Abbreviations:
EV - electric vehicle
NW - northwest
TDM - Transportation Demand Management
TSM - Transportation Systems Management
VMT - vehicle miles traveled

3. Greenhouse Gas (GHG) Reduction Plan Update - CEQA Project Consistency Checklist

GHG Reduction Plan Update consistency review involves the evaluation of project consistency with the applicable strategies of the GHG Reduction Plan Update. The GHG reduction strategies identified in the GHG Reduction Plan Update relies upon the General Plan and additional local measures as the basis of the development related strategies to reduce GHG emissions. This checklist is developed based on the key local GHG reduction strategies and actions identified in the GHG Reduction Plan Update that are applicable to proposed development projects. Note that not all strategies listed below will apply to all projects. For example, not all projects will meet mixed-use related policies of the General Plan, because not all projects are required to be mixed use.

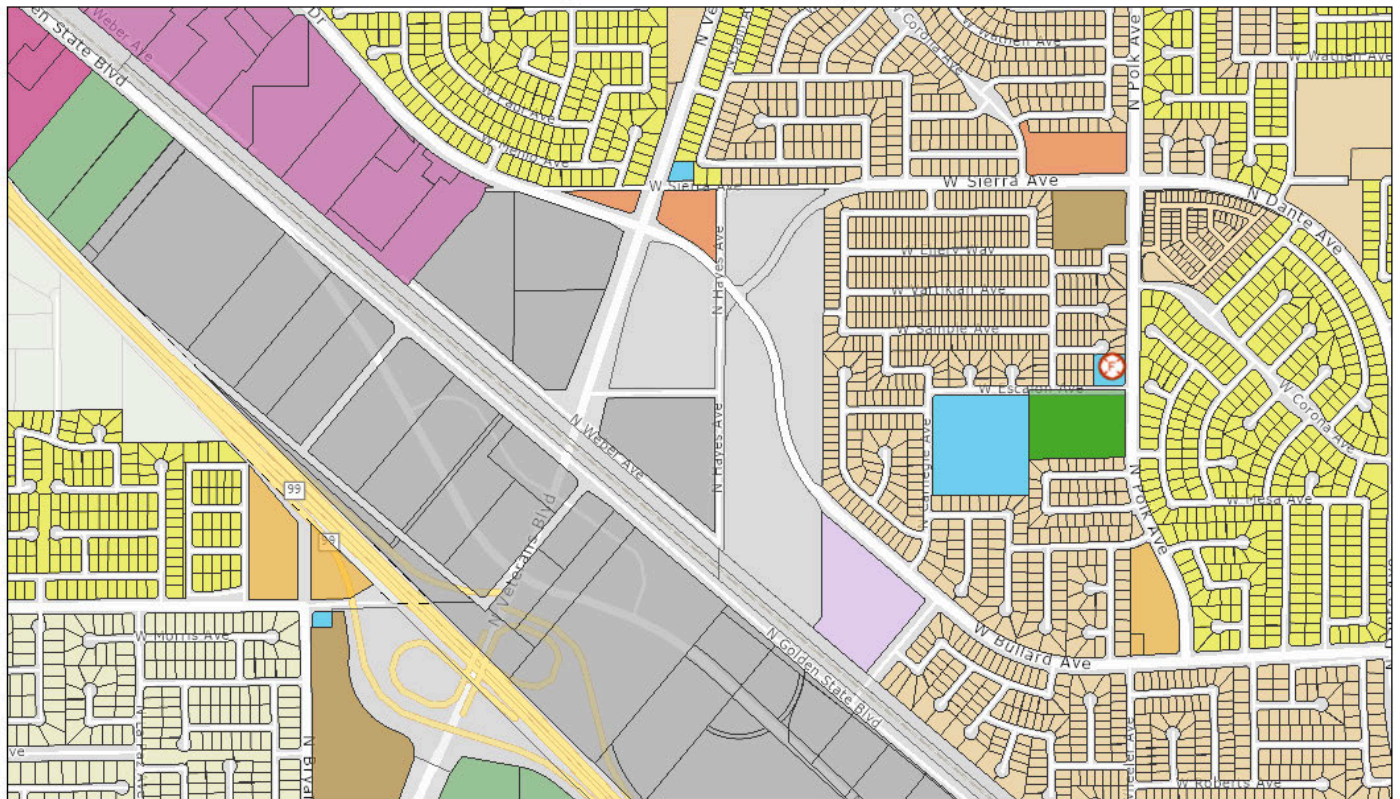
Checklist Item (Check the appropriate box and provide an explanation for your answer)	Relevant General Plan Policy	Yes	No	Not Applicable (NA)	Explanation
1: Land Use and Transportation Demand Strategies					
a. Does the project include mixed-use, development? For GHG Reduction Plan consistency, mixed-use development is defined as pedestrian-friendly development that blends two or more residential, commercial, cultural, or institutional, uses, one of which must be residential	Policy UF-1-c, LU-3-b, Objectives-UF 12, UF-12-a, UF-12-b, UF-12-d, Policy RC-2-a			NA	The project is not a mixed-use development. It does not include residential development.
b. Is the project high density? For GHG Reduction Plan consistency, is the project developed at 12 units per acre or higher?	LU-5-f			NA	The project is not high density.
c. Is the project infill development, pursuant to the General Plan definition of location within the City limits as of December 31, 2012?	LU-2-a, Objective-12, UF-12-a, UF-12-b, UF-12-d	yes			
d. Does the project implement pedestrian bicycle, and transit linkages with surrounding land uses and neighborhoods? For GHG Reduction Plan consistency, the project must include all sidewalks, paths, trails, and facilities required by the General Plan and Active Transportation Plan, as implemented through the Fresno Municipal Code and project conditions of approval.	Policy UF-1-c, UF-12-e, Policy RC-2-a, Objective MT-4, 5, 6, Policy MT-4-c, Policy MT-6-a, Policy POSS-7-h Objective MT-8, Policies MT-8-a, MT-8-b	yes			The project implements pedestrian, bicycle, and transit linkages to surrounding land uses and neighborhoods consistent with Fresno's General Plan and Active Transportation Plan.
e. If the project includes mixed-use or high density development, is it located within ½ mile of a High Quality Transit Area as defined in the City's CEQA Guidelines for Vehicle Miles Traveled? Or, is the project located within 500 feet of an existing or planned transit stop?	Policy UF-12-a, UF-12-b, LU-3-b, Objective MT-8, Policies MT-8-a, MT-8-b			NA	The project is not a mixed-use or high density development
f. Will the project accommodate a large employer (over 100 employees) and will it implement trip reduction programs such as increasing transit use, carpooling, vanpooling, bicycling, or other measures to reduce vehicle miles traveled pursuant to San Joaquin Valley Air Pollution Control District Rule 9410?	Policy MT-8-b, Objective MT-9, Policy MT-10-c, San Joaquin Valley Air Pollution Control District Rule 9410	yes			The project will implement trip reduction programs to encourage carpooling and other measures to reduce employee VMT.
See the SIVAPCD website for details: https://www.valleynair.org/rules/currentrules/r9410.pdf					

(Check the appropriate box and provide an explanation for your answer)	Checklist Item	Relevant General Plan Policy	Yes	No	Not Applicable (NA)	Explanation
g. If the project includes modifications to the transportation network, do those improvements meet the requirements of the City of Fresno's Complete Streets Policy, adopted in October 2019? According to the policy, a complete street is a transportation facility that is planned, designed, operated, and maintained to provide safe mobility for all users - including bicyclists, pedestrians, transit vehicles, trucks, and motorists - appropriate to the function and context of the facility while connecting to a larger transportation network. See City of Fresno website for details: https://www.fresno.gov/publicworks/wp-content/uploads/sites/17/2019/10/CompleteStreets-091119.pdf	MT-1-g, MT-1-h	yes				The project includes modifications to the transportation network consistent with the City's Complete Streets Policy. Such improvements include constructing sidewalk along the project frontage, constructing a multi-use path, and installing striping to better delineate the roadway cross section for different users.
h. Does the project have a less than significant VMT impact, either through satisfying screening criteria or mitigating VMT impacts, pursuant to the City's adopted VMT thresholds? See City of Fresno website for details: https://www.fresno.gov/darm/wp-content/uploads/sites/10/2021/01/CEQA-Guidelines-for-Vehicle-Miles-Traveled-Final-Adopted-Version.pdf	MT-2-b, MT-2-c	no				The project has a significant VMT impact.
2: Electric Vehicle Strategies						
a. For new multi-family dwelling units with parking, does the project provide EV charging spaces capable of supporting future EV supply equipment (EV capable) at 10% of the parking spaces per 2019 California Green Building Standards Code (CALGREEN, Title 24, Part 11), Section 4.106.4	Policy RC-8-j				NA	The project does not consist of multi-family dwelling units.
b. For new commercial buildings, does project provide EV charging spaces capable of supporting EV capable spaces at 4% to 10% of the parking spaces per 2019 California Green Building Standards Code (CALGREEN, Title 24, Part 11), Section 5.106.5.3	Policy RC-8-j	yes				Of 889 parking spaces, there will be 45 installed EV spaces, which is 5% of the parking spaces (in range).
3: Energy Conservation Strategies						
a. Does the project meet or exceed mandatory state building energy codes? If yes, does the project follow any other GreenPoint ratings such as LEED, Energy Star or others? If yes, indicate level of certification-Silver, gold, platinum if applicable?	Policy RC-5-c, Objective RC-8, Policy RC-8-a	yes				The project meets mandatory building energy codes. Costco's warehouse designs are consistent with the requirements of LEED.
b. For commercial projects, does the project achieve net zero emissions electricity? Mark NA if project will be permitted before 2030. Mark Yes if voluntary. Add source and capacity in explanation.	Additional Recommended GHG Plan Measure, supports Objective RC-8				NA	Project buildout is in 2023.

Checklist Item (Check the appropriate box and provide an explanation for your answer)		Relevant General Plan Policy	Yes	No	Not Applicable (NA)	Explanation
4: Water Conservation Strategies						
a. Does the project meet or exceed the mandatory outdoor water use measures of the 2019 California Green Building Standards Code (CALGREEN, Title 24, Part 11), Section 4.304? If the project exceeds CalGreen Code mandatory measures provide methods in excess of requirements in the explanation. Examples include outdoor water conservation measures such as; drought tolerant landscaping plants, compliant irrigation systems, xeriscape, replacing turf etc. Provide the conservation measure that the project will include in the explanation.		Objective RC-7, Policy RC-7-a, RC-7-h	yes			The project meets the mandatory outdoor water use measures.
b. Does the project meet or exceed the mandatory indoor water use measures of the 2019 California Green Building Standards Code (CALGREEN, Title 24, Part 11), Section 4.303? If the project exceeds CalGreen Code, mandatory measures provide methods in excess of requirements in the explanation. Examples may include water conserving devices and systems such as water leak detection system, hot water pipe insulation, pressure reducing valves, energy efficient appliances such as Energy Star Certified dishwashers, washing machines, dual flush toilets, point of use and/or tankless water heaters.		Objective RC-7, Policy RC-7-a, RC-7-e	yes			The project meets the mandatory indoor water use measures. High-efficiency restroom fixtures save 40% more water.
5: Waste Diversion and Recycling Strategies						
a. Does the project implement techniques of solid waste segregation, disposal and reduction, such as recycling, composting, waste to energy technology, and/or waste separation, to reduce the volume of solid wastes that must be sent to landfill facilities?		Policy PU-9-a, RC-11-a	yes			Costco prefers full metal buildings in order to use the maximum amount of recycled material.
b. During construction will the project recycle construction and demolition waste?		Policy RC-11-a	yes			The project will recycle construction and demolition waste.
c. Does the project provide recycling canisters in public areas where trashcans are also provided?		Policy RC-11-a	yes			The project will provide recycling canisters.

Note: The GHG reduction strategies included in this checklist are based on the GHG reduction strategies identified in the Chapter 5 of the GHG Reduction Plan Update.

City of Fresno GIS Map



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Fire Stations
- Zoning**

 - RD-3 - Residential Single-Family, Low Density
 - RD-4 - Residential Single-Family, Medium Low Density
 - RD-5 - Residential Single-Family, Medium Density
 - RM-1 - Residential Multi-Family, Medium High Density
 - RM-2 - Residential Multi-Family, Urban Neighborhood
 - CC - Commercial Community
 - CR - Commercial Regional
 - CH - Commercial Highway and Auto
 - BP - Business Park
 - LI - Light Industrial
 - OS - Open Space
 - PR - Park and Recreation
 - PI - Public and Institutional
 - Parks
- Parcels

 - City
 - County

