

Costco Commercial Center DEIR Public Comments
August 20, 2023 through August 26, 2023

costco on herndon and riverside.

Darius Assemi <DAssemi@gvhomes.com>

Mon 8/21/2023 4:26 PM

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

Cc: Becky Wharton <becky.wharton@gvhomes.com>;

External Email: Use caution with links and attachments

Jose Valenzuela, Planner III
Planning and Development Department
[2600 Fresno Street, Room 3065](#)
[Fresno, CA 93721](#)

Dear Jose,

I am the owner of the 14 acre multi-family project (under construction) across the street from the future Costco and welcome the choice of shopping it brings to northwest Fresno residents. I am confident the environmental document and the approval process the city has will address the concerns from residents. Not every one will be happy. but overall this will be a great addition to north west Fresno. And as a city we need the tax base.

I urge an approval of this project by the governing bodies.

Thank you,

Darius Assemi
Granville Homes | gvhomes.com
P: 559.436.0900



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Proposed Costco Location

Noel Delgado <ngd1@att.net>

Mon 8/21/2023 6:58 PM

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

External Email: Use caution with links and attachments

Mr. Valenzuela

I am a 12 year resident in Northwest Fresno and reside in the area of Polk and Herndon. When my wife and I purchased our home , the area was fairly quiet with most traffic coming through just to get to the 99. Over the last 10 years there has been significant growth in the area and with that more traffic, graffiti, homeless, etc. Even before the growth there was a traffic issue especially with the railroad at Golden State and Herndon.

The proposed new site is supposedly due to the current traffic situation at the Costco's current Shaw location. How is building the "world's largest Costco" at this location going to be any better? The Marketplace at El Paseo already generates a very significant amount of traffic in the area. There are schools right up the street and many residences also next to the proposed sight not to mention the beautiful golf course as well. This a safety and traffic issue and a Costco does not belong in the area. In my opinion as a resident that travels down Herndon every single day, the proper infrastructure is not in place for such a business to be built. The proposed site is not a solution to their "traffic" problem, all it does is push the problem further north into an already busy and increasingly congested area where kids go to school and families live. I'm all for the growth of our community but this proposed new business site is not the appropriate location for such a large project. Thank you for your time and allowing me to voice my concerns.

Very respectfully,
Noel Delgado

[Sent from AT&T Yahoo Mail for iPad](#)



August 23, 2023

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

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

District CEQA Reference No: 20230629

Dear Mr. Valenzuela:

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

The District offers the following comments regarding the Project:

1) Project Related Emissions

1a) Construction Emissions

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

Samir Sheikh
Executive Director/Air Pollution Control Officer

Northern Region
4800 Enterprise Way
Modesto, CA 95356-8718
Tel: (209) 557-6400 FAX: (209) 557-6475

Central Region (Main Office)
1990 E. Gettysburg Avenue
Fresno, CA 93726-0244
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34946 Flyover Court
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2) Health Risk Screening/Assessment

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

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

3) Industrial/Warehouse Emission Reduction Strategies

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

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

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

4) Truck Routing

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

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

5) Cleanest Available Heavy-Duty Trucks

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

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

- *Recommended Measure:* Fleets associated with operational activities utilize the cleanest available HHD trucks, including zero and near-zero technologies.
- *Recommended Measure:* All on-site service equipment (cargo handling, yard hostlers, forklifts, pallet jacks, etc.) utilize zero-emissions technologies.

6) Reduce Idling of Heavy-Duty Trucks

The goal of this strategy is to limit the potential for localized PM_{2.5} and toxic air contaminant impacts associated with the idling of Heavy-Duty trucks. The diesel exhaust from idling has the potential to impose significant adverse health and environmental impacts.

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

7) Vegetative Barriers and Urban Greening

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

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

8) On-Site Solar Deployment

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

9) Electric Vehicle Chargers

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

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

10) District's Bikeway Incentive Program

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

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

11) District Rules and Regulations

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

11e) District Rule 4601 (Architectural Coatings)

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

11f) District Regulation VIII (Fugitive PM10 Prohibitions)

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

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

The application for both the Construction Notification and Dust Control Plan can be found online at:

<https://www.valleyair.org/busind/comply/PM10/forms/DCP-Form.docx>

Information about District Regulation VIII can be found online at:

http://www.valleyair.org/busind/comply/pm10/compliance_pm10.htm

11g) Other District Rules and Regulations

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


12) District Comment Letter

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

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

Sincerely,

Brian Clements
Director of Permit Services

A handwritten signature in blue ink, appearing to read "Mark Montelongo", with a stylized flourish at the end.

Mark Montelongo
Program Manager

Traffic pattern for Costco

Ray Gonzales <raygonzales46@icloud.com>

Thu 8/24/2023 4:31 PM

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

External Email: Use caution with links and attachments

I live adjacent to the Riverside Golf Course and I am interested in what the traffic pattern will be pertaining to Spruce and Hayes Avenues. Thank you for your time.

Sent from my iPhone

Costco concerns

Jennifer Airheart <jairheart22@icloud.com>

Thu 8/24/2023 6:43 PM

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

External Email: Use caution with links and attachments

Hi,

I am a neighbor of the new proposed Costco.

I have concerns about additional traffic delays, gas smells from the pumps, and gas station staying open so late. The shopping center has increased the traffic greatly. I do not believe there is enough room next to golf course. I do not want it exiting on Polk.

Thank you for your efforts to help homeowners in this area

Costco Public Comment

Amy Zehring <amy_zehring@att.net>

Fri 8/25/2023 7:47 AM

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

External Email: Use caution with links and attachments

It is time for Fresno to start making major planning decisions that don't increase VMT. Saying increased VMT is "unavoidable" is lazy. Reducing VMT in an area that is highly car-centric will be difficult, but it can be done.

Shopping in bulk does not necessarily require a car. It does require streets that are welcoming to other modes of transportation, such as bicycles. Fresno does not need more gas stations and car washes. Fresno does not need the air pollution and noise pollution that this giant Costco will bring.

Since the current plan for the Costco project is highly car-centric and does not significantly reduce VMT by making surrounding roads bicycle and pedestrian friendly to Costco members, the project needs to go back to the drawing board. The project should not be approved in its current state. VMT MUST BE REDUCED.

Sincerely,

Amy Zehring

Jose Valenzuela, Fresno Supervising Planner

2600 Fresno Street, Room 3043

Fresno, CA 93721

August 24, 2023

Good Afternoon Mr. Valenzuela,

We are homeowners in the development just west of Riverside Golf Course; the main access to our home is via Riverside Drive and we have many concerns about the proposed Costco store at Herndon and Riverside Drive.

Our main concern is, of course, traffic. Right now, the only access point to our location is Riverside Drive (a two lane road) or Thiele Avenue, which you must maneuver through neighborhoods to access. Obviously, there's no access from the north as the housing development is against the river bluff. Even now, when there is a train, Herndon becomes backed up so far back that if emergency services needed to access our neighborhood, they would be unable to drive there. The massive increase in traffic from this proposed giant Costco would likely set that entire area in a gridlock even when there is no train.

We realize the new Veteran's Boulevard access from the south could potentially ease some of the Herndon congestion, but that has yet to be proven since it's not complete yet. I realize as well there are talks of opening Spruce Avenue to go all the way through along the southern edge of the golf course.

The plan states that Costco intends to position their 32 proposed fuel pumps and car wash along the northern edge of the property, this will cause large amounts of traffic on Spruce Avenue for those seeking fuel from Costco and would likely negate additional access to the neighborhood.

This proposed Costco development with 889 parking spaces and 32 gas pumps (conservatively 64-100 cars waiting for fuel at any given time, decreasing the quality of the air) would not only increase traffic but there's also concerns about the transport truck traffic as well as an increase in the homeless population that congregates around every Costco.

The northwest corner of Riverside Drive and Spruce Avenue contains a school bus stop and just across Herndon is an Elementary School and a Middle School. All this increased traffic equates to additional danger for the children in the neighborhood.

We realize the city council would like to see the increased number of jobs this store will create - but how many more jobs really if everyone from the Shaw location comes to the new store? Everyone in our neighborhood is also concerned about a potential decrease in property values from the impact of this proposed Costco. We were under the impression that the corner would be developed with houses, as was the case with the west side of Riverside Drive. It's likely that this Costco wasn't in the works nine years ago when we purchased our property, had we known it was even a possibility, we would have looked elsewhere.

It seems the ideal Costco (or any giant size store) location would be on a site that has access from all sides and does not hinder access to a specific neighborhood (much like the Costco in Hanford). Until the traffic benefit from the Veterans Blvd overpass/onramp is known, it seems reckless to proceed with a business of this size in a neighborhood that has compromised access to begin with.

Thank you for your time,

Brian & Sherryl Kellogg

TO: Jose Valenzuela, City of Fresno Planning Department
FROM: Rodger B. Jensen, Jenco Farms, LP
RE: Comments on the draft EIR concerning the proposed Costco Commercial Development
DATE: August 25, 2023

Mr. Valenzuela, Jenco Farms, LP is the owner of the land on which the proposed Costco development would be located on the northwest corner of Riverside Drive and Herndon Avenue. Since 1941, this parcel has been owned by family members of the partners of Jenco Farms, LP. For many years, the family farmed a fig orchard on this site until the trees were removed decades ago. Since that time, the land has been open and unused.

The property, which is east of the Herndon townsite, was originally zoned for agricultural uses. When that zoning designation was changed to accommodate urban use, it was then designated for commercial and/or industrial uses, as were other areas in that townsite and south thereof along Highway 99 and the adjacent railroad tracks. For decades and long before the current urban uses, the site of the proposed Costco commercial development has been planned to accommodate intensive non-residential uses. The fact of that commercial/industrial designation has been known (or at least available to) to the public, including purchasers of property for any use in the vicinity of the Herndon townsite. That history should be taken into account when considering the objections of some to this development.

Veterans Boulevard is now a reality, but it, too, has been "on the books" for approximately 40 years. That roadway was designed to direct traffic to Herndon Avenue east of the proposed development site via an overpass that avoids conflict with rail traffic and also with vehicular traffic coming west-bound along Herndon Avenue and east-bound to and along it under Highway 99. This new route avoids both those causes of current congestion. As a result, vehicle traffic passing through the intersection of Herndon Avenue and Riverside Drive will be greatly reduced. The Bullard Plan, which has been cited in conversations with senior city staff, predicts that such reduction will cut the trips by approximately 50%. Further reductions would occur by allowing access to this proposed site from Herndon Avenue between Hayes Avenue and Riverside Drive. Those total reductions should also be taken into account when considering the objections of some to the Costco proposal.

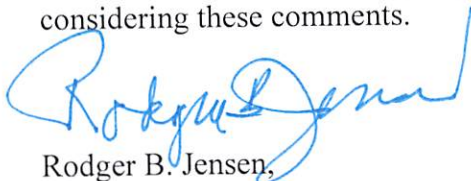
The draft EIR for the proposed Costco project addresses traffic concerns and analyzes future traffic patterns. The measures that Costco intends to take will reflect the impact of completing the Veterans Boulevard and other traffic routings that spread traffic flow to avoid congestion at several access points. Having alternative routes will smooth and expedite the flow of that traffic.

While the portion of the draft EIR concerning that flow of traffic is particularly useful and complete, the other parts of that EIR are also highly informative. Taken as a whole, the draft EIR is detailed, extensive and comprehensive. It is more than adequate in describing and analyzing potential negative impacts of the project, as well as noting effective mitigation measures.

Finally, the economic consequences of relocating Costco operations in Fresno, instead of elsewhere, are clearly favorable. Obviously, Costco members here and in nearby communities will benefit from being able to come to a modern, convenient, and well-planned site with ample access and efficient parking along with pleasant landscaping. When those members shop at a new and more appealing location, they benefit from the savings they enjoy when purchasing items at discounted prices. Those members, in effect, are able at least to resist inflation by having

their money go further because of those prices. The proposed relocation of Costco will not leave their present location vacant: another tenant will occupy the building, and the Costco fueling station will remain. Sales tax revenue to the city of Fresno will continue. In addition, other Costco relocations, such as the ones in Clovis and Visalia, have multiplied tax revenue over that generated from the former locations. Obviously, our city and the County of Fresno will benefit from that increased revenue, as well as all the direct and indirect community benefits.

For all these reasons, I urge approval of the proposed Costco development. Thank you for considering these comments.

A handwritten signature in blue ink, appearing to read "Rodger B. Jensen". The signature is fluid and cursive, with a large initial "R" and a long, sweeping underline.

Rodger B. Jensen,
Jenco Farms, LP