

Costco Commercial Center DEIR Public Comments
August 27, 2023 through August 28, 2023

From: [Planning](#)
To: [Jose Valenzuela](#)
Subject: FW: Worlds largest COSTCO
Date: Monday, August 28, 2023 10:58:33 AM

Jose Quijano | Senior Administrative Clerk
Current Planning | Planning & Development
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Resources: [Planning & Development](#) | [GIS Data Hub – Interactive Zoning Map](#) | [Fresno Municipal Code](#)
[Accela Citizens Access \(ACA\) Online Plans/Permits/Inspections](#) | [ACA Instruction Videos](#)

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

From: James Fleck <jfleck5@icloud.com>
Sent: Monday, August 28, 2023 10:29 AM
To: Planning <Planning@fresno.gov>
Subject: Worlds largest COSTCO

External Email: Use caution with links and attachments

I would like to express my concern about the proposed development of a COSTCO in NW Fresno. The traffic congestion in the proposed area is already is already terrible most of the day especially during “rush hours”. A COSTCO warehouse could only increase traffic with trucks and automobiles. Environmentally, it would increase air pollution from auto congestion, along with noise and light pollution. If the City of Fresno is trying to rehabilitate areas of Fresno then why not locate a new store in areas where the residents can have access to a discount store?
Thank You for your consideration,
James Fleck a 73yr resident of NW Fresno.

Sent from my iPhone

From: [gabriel ledesma](#)
To: [Jose Valenzuela](#)
Subject: Comments on Costco Commercial Center
Date: Monday, August 28, 2023 10:48:21 AM

External Email: Use caution with links and attachments

Good Morning, Jose--

I had a few questions and comments regarding the Costco Commercial Center.

I'm a resident of Fresno, CA, and am concerned about this project's impact to the San Joaquin River and the federally listed Spring-Run Chinook Salmon (*Oncorhynchus tshawytscha*). The project is close to FMFCD's stormwater basin, Basin "EG", which discharges to the San Joaquin River during rain storms. This project's stormwater may impact the San Joaquin River's quality.

Questions/Comments:

1. Will the project discharge any stormwater to Basin "EG" *during* or *after* construction? If so, can you change the language in the EIR to reflect this? For example, on page 3.9-7, the dEIR does not mention that Basin "EG" discharges to the SJR during rain events.
2. Also, on page 3.9-11, the dEIR mentions building a storm drain on Spruce Ave. Is this a storm drain that discharges to Basin "EH" or to Basin "EG"? It's an important distinction as Basin "EG" discharges to the SJR (see attached photo).
3. If the project will discharge water to Basin "EG" during construction, the developer/owners will need to contact the Central Valley Regional Water Quality Control board and ask if they need to apply for Risk Level 2 coverage under the Construction General Permit.
4. If the project discharges stormwater to Basin "EG" *after* construction, then the developers/owners need to contact FMFCD and ask about FMFCD's post-development stormwater requirements.

The project's stormwater discharges to Basin "EG" may be small, but it's important to ask. As a resident of Fresno, it's very important that we protect our local natural resources, especially those as sensitive and unique as the San Joaquin River and the Chinook Salmon. There are multiple federally-listed and special status species in the SJR, so it's important to note these potential impacts in this project's EIR. Especially for a project this large and with so many potential pollutant sources (car wash, gas station, loading docks, and increase traffic).

Feel free to contact me if you have any questions.

Thank you,

Gabriel Ledesma

August 28, 2023

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

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

Dear Mr. Valenzuela:

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

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

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

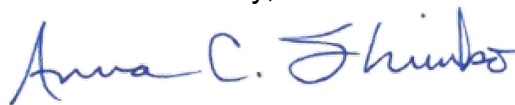
Mr. Jose Valenzuela
City of Tracy
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measure state that Costco shall provide such a program that is “designed to” achieve a certain measure of success.

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

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

Sincerely,



Anna C. Shimko

ACS/pm