



## Moreland West Neighborhood Association

Serving the area of San Jose and Campbell bordered by  
Hamilton Ave, Campbell Ave & San Tomas Aquino Rd

Department of Planning, Building, and Code Enforcement  
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February 11, 2022

**Re: Notice of Preparation of a Draft Environmental Impact Report  
for Westgate West Costco Warehouse Project**  
File No. CP21-022

The Moreland West Neighborhood Association represents the area in San Jose and Campbell bordered by Hamilton Avenue, Campbell Avenue and San Tomas Aquino Road. Our neighborhood is located in the heart of the Paseo de Saratoga Urban Village, which encompasses the proposed Costco Warehouse site.

This project would shoehorn a popular 166,058 sq. ft. membership warehouse center into an unusually small site, in a dense urban location that is immediately adjacent to homes and diagonally opposite from a high school. This is not the ideal place for a Costco Warehouse, and it may not be a sensible one.

Our residents drive past the site regularly. We shop and dine at Westgate West's neighborhood stores and restaurants. Our teenagers walk and ride bicycles to and from Prospect High School.

Our primary concerns about the project are:

- **Traffic Impacts** caused by this and other expected development in the area
- **Pedestrian & Cyclist Safety** along Prospect Road, especially where students cross at Lawrence Expressway
- **Site Access and Circulation** issues, including the adequacy of parking for Costco shoppers and protection of parking for co-located businesses

We would like the Draft EIR to study the following potential impacts of the project and to consider these possible mitigation measures:

### ***Air Quality***

- Analyze the project's expected impact – due to construction and increased traffic congestion – on air quality in the area, including at the intersection of Prospect Road and Lawrence Expressway and at the intersection of Prospect Road and Saratoga Avenue. Projections should be available for different times of day (8:30 a.m., 2:30 p.m., 5:00 p.m. and 6:30 p.m.) and for different times of the year, including June (end of school year) and August (start of school year).

### ***Biological Resources***

- To mitigate the removal of 69 existing trees, consider requiring the developer to plant native trees to reduce water use and support native wildlife.

### ***Energy***

- Identify which project design features reduce energy consumption.
- To offset increased energy usage, consider requiring onsite solar energy generation.

### ***Greenhouse Gas Emissions***

- Discuss how the project supports San Jose's goal of carbon neutrality by 2030.
- To offset greenhouse gas emissions, consider requiring EV charging stations.
- Will Costco encourage its 250-300 employees to take transit? How will it do this? Will it offer incentives like free or reduced-price Clipper passes?

### ***Land Use***

- Discuss the project's consistency with the City's strategy to develop the Paseo de Saratoga Urban Village area to support a walkable, bicycle-friendly, transit-oriented, mixed-use environment.

### ***Noise and Vibration***

The Notice of Preparation's section on Noise and Vibration states "The Project site is located adjacent to the Lawrence Expressway." It is also adjacent to residential neighborhoods, a medical center, and other businesses.

- Analyze potential noise and vibration impacts of project construction and operation at several locations, including:

- In the Country Lane neighborhood, near Field Drive and Ferguson Way
- In residential locations across Lawrence Expressway
- In front of Super Duper Burgers and Trader Joe’s
- Near Quest Diagnostics
- At Prospect High School’s football field

The Notice of Preparation also states that “On average, ten trailer trucks would deliver goods to the proposed Costco between 2:00 A.M. and 1:00 P.M. with an average of two to three trucks arriving per hour.”

- At recent community meetings, Country Lane residents requested no deliveries before 6 a.m. This is reasonable and should be considered as a mitigation measure.

**Public Services**

There have been a considerable number of car break-ins at Westgate Mall and El Paseo de Saratoga Shopping Center.

- What parking security measures will Costco put in place to protect shoppers and reduce demand for police services?

***Transportation and Circulation***

- Traffic analysis should study impacts along the following roadways – and their major intersections – during high school drop off (8:30 a.m.), high school pick up (2:30 p.m.) and evening commute times (5 p.m. and 6:30 p.m.):
  - Saratoga Avenue from I-280 to I-85
  - Lawrence Expressway from I-280 to Saratoga Avenue
  - Prospect Road from the entrance to Prospect High School to the Hamilton Avenue/Campbell Avenue split. (This stretch is particularly congested and the cause of significant neighborhood cut-thru traffic.)
- Traffic analysis should consider the merits of making Lawrence Expressway, not Prospect Avenue, the main entrance for Costco.
- Traffic analysis should consider closing off the Costco site from Graves.
- Discuss the project’s consistency with the West San Jose Multimodal Transportation Improvement Plan and the designation of Saratoga Avenue as a “Grand Boulevard”.
- What improvements are planned for roads and intersections in the area separate from and as a result of the project?
- Will Donahue Schriber or Costco have any obligation to help fund improvements?

- Class IV bike lanes are planned for major streets in the area. How might these plans be affected by the project? Are there any plans to extend the Saratoga Creek Bike Trail as a result of this project?
- Will the proposed site access from Prospect Road and parking configuration result in most cars parking on the roof or will most cars seek surface parking?
- Adequate parking is key to good site circulation. According to Costco's website, 750 spaces are typical for a "Regular Costco", yet this project only includes 689 dedicated parking spaces. Are 689 spaces adequate for a Costco this size?
- Could protected parking for co-located businesses be established and enforced to encourage Costco shoppers to park on the roof and not take up parking needed by other businesses and their patrons?
- How will Costco discourage employees and customers from parking in adjacent neighborhoods?

### ***Cumulative Impacts***

- The traffic analysis and other studies should take into account the impact of all foreseeable projects in the area, including:
  - 1312 El Paseo & 1777 Saratoga Avenue Mixed-Use Village Project
  - Total growth plans for the Paseo de Saratoga Urban Village
  - Total growth plans for the Saratoga Avenue Urban Village
  - Residential development plans to the southeast of the Prospect/Lawrence intersection and along Saratoga Avenue near Cox Avenue

### ***Other Sections***

- Please evaluate the project's consistency with the City's plans to transform this area into a pedestrian-friendly, transit-oriented, mixed-use Urban Village.

Thank you for considering our comments as you prepare the Draft EIR for this project.

*Amy Y Cody*

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