



CALIFORNIA FARM BUREAU FEDERATION

NATURAL RESOURCES AND ENVIRONMENTAL DIVISION

2300 RIVER PLAZA DRIVE, SACRAMENTO, CA 95833-3293 • PHONE (916) 561-5665 • FAX (916) 561-5691

2008 AUG -5 P 3:49

August 4, 2008

Via US Mail, Certified
7099 3400 0017 4920 4025

Stanislaus County
ATTN: KEITH BOGGS
1010 – 10th Street, Suite 6800
Modesto, CA 95354

Re: *Comments on West Park Project (Notice of Preparation SCH No. 2008062066).*

Dear Mr. Boggs:

Thank you for the opportunity to comment on the CEQA Notice of Preparation regarding the proposed West Park Project. The Stanislaus County Farm Bureau and the Merced County Farm Bureau join in these comments and we will all be collectively referred to as “Farm Bureau,” unless otherwise specified.

The California Farm Bureau Federation is a non-governmental, non-profit, voluntary membership California corporation whose purpose is to protect and promote agricultural interests throughout the state of California and to find solutions to the problems of the farm, the farm home and the rural community. Farm Bureau is California’s largest farm organization, comprised of 53 county Farm Bureaus currently representing approximately 91,000 members in 56 counties. Farm Bureau strives to protect and improve the ability of farmers and ranchers engaged in production agriculture to provide a reliable supply of food and fiber through responsible stewardship of California’s resources.

The Stanislaus County Farm Bureau represents the interests of more than 3800 members in Stanislaus County and its mission is to protect and enhance the viability of agriculture in Stanislaus County. The Merced County Farm Bureau represents the interests of more than 2000 members in Merced County and our mission is to protect and enhance the viability of agriculture in Merced County.

In reviewing the Notice of Preparation, Farm Bureau has several concerns regarding the project, enumerated here for consideration as the draft EIR is prepared.

- **Significant Loss of Agricultural Resources:** The 4,800 acres that encompass the project consists of a proposed General Plan amendment and rezoning on all 4,800 acres changing the existing General Plan designation from “Agriculture” to “Specific Plan” and modifying the zoning district from “A-2-40 (General Agriculture)” to “Specific Plan.” This potential conversion of agricultural resources must be analyzed in the draft EIR. The EIR should examine a range of alternatives to include alternatives that minimize impact on agricultural resources by using less than 4,800 acres, and that mitigate the loss of agricultural land to the county by an appropriate conservation exchange of like lands in a 4-1 ratio.
- **Significant Traffic Congestion Increases Impacting Small Rural Communities:** The project as proposed indicates a substantial increase in traffic entering and exiting the Westside communities via corridors that have previously been used for rural and agricultural traffic primarily.
- **Significant Impacts to Wildlife:** Wildlife and critical habitat in the Crow’s Landing and other surrounding areas and waterways could be negatively impacted by this project. It is well documented that agricultural lands provide habitat for numerous species to thrive.
- **Significant impacts to Air Quality:** This growth inducing project could create high levels of noxious gases that could further degrade air quality in the San Joaquin Valley harming our rural communities, agricultural lands and natural resources. The increased traffic from residents and employees traveling to/from West Park could also contribute to global climate change through release of greenhouse gases.
- **Significant and Cumulative Impacts to Groundwater Resources:** The EIR should also examine not only impacts to water quality, but also to water resources. This should involve an examination of water supply impacts the project may have, and how that might impact the water supply otherwise available for production agriculture as well as alternatives for mitigation such as increased recharge.
- **Significant Impacts to Water Resources:** The EIR needs to address where the water for this project will come from. With numerous lawsuits and judicial decisions regarding the San Joaquin River, the Delta and threatened/endangered species still undecided, the amount of water available for any development in the San Joaquin Valley is not easy to predict. Therefore, the EIR needs to carefully analyze and study where it will obtain approximately 14 million gallons per day needed for this project. Additionally, if water is obtained from Valley farmers and ranchers, then the EIR must analyze the associated

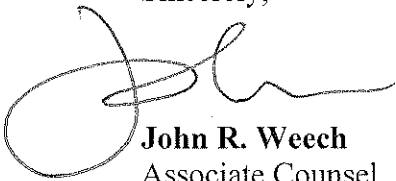
substantial environmental impacts from that loss of water, including the loss of more prime agricultural land.

- **Significant Impacts from Runoff and Storm Water Drainage:** The EIR should address impacts from runoff and storm water drainage in regards to the Irrigated Lands Waiver.
- **Significant Impacts from Flooding:** The area surrounding Crow's Landing and the greater Westside region is a known flood zone and this issue needs to be fully analyzed in the EIR with proposed mitigation measures.

Farm Bureau is opposed to this project as proposed and believes that its adverse agricultural and environmental impacts should be thoroughly examined and mitigated in the EIR.

Thank you for the opportunity to provide comment on these concerns. We would like to request timely notice of all future meetings and review dates regarding the EIR and subsequent meetings that are part of the CEQA process regarding the proposed complex.

Sincerely,



John R. Weech
Associate Counsel
California Farm Bureau Federation
Natural Resources and Environmental Division
Also on behalf of the
Stanislaus County Farm Bureau, and the
Merced County Farm Bureau

JRW\mmm

cc: Stanislaus County Farm Bureau
Merced County Farm Bureau