



DEPARTMENT OF PUBLIC WORKS
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Keith D. Boggs
Deputy Executive Officer – Economic Development
1010 10th Street
Suite 6800, Sixth Floor
Modesto, CA 95354

RE: Notice of Preparation (NOP) of a Draft Environmental Impact Report (EIR) for the West Park Specific Plan Project

Dear Mr. Boggs:

Merced County (County) has reviewed the NOP for the West Park Specific Plan Project (Project). A County representative also attended the scoping session held on July 1, 2008 in the Community of Crows Landing. The County requests that the EIR prepared by Stanislaus County for this project address the following:

Traffic

1. Level of Service (LOS) Evaluations

a. Methodology

The Highway Capacity Manual (HCM) is the reference source that is required for analyzing projects within Merced County. The Preliminary Traffic Circulation Master Plan (PTCMP) did not use the HCM methodology, nor did it provide documentation as to how LOS values were derived. Merced County requests that all County roadways and intersections anticipated to be impacted by the project be analyzed using the most current HCM methodology for LOS evaluations.

b. Analyses

The LOS evaluations must consist of AM and PM Peak Hour Analyses.

c. Scenarios

The analyses must include the following scenarios: Existing, Project Year without Project, and Project Year with Project. The Existing scenario must consist of an analysis based upon actual and current traffic volumes. The Project Year scenarios must also consist of analyses based upon projected future traffic volumes for the year when the Project is anticipated to be completed.

2. Merced County Roadways

a. Roadways

The Traffic Study needs to evaluate the LOS of all Merced County roadways and intersections anticipated to be significantly impacted by the Project. The roadways

evaluated must include at a minimum the following: 1) Bradbury Road, between Stanislaus County Line and SR99; 2) River Road, between Stanislaus County Line and Vinewood Avenue; 3) Vinewood Avenue, between River Road and Livingston City Limits; and Westside Boulevard, between SR165 and SR99.

b. Intersections

The intersections evaluated must include at a minimum the following: Bradbury Road @ SR99 Ramps, Griffith Road, and SR165; River Road @ SR165; and Westside Boulevard @ SR165, Lincoln Boulevard, Sultana Drive, Arena Way, and SR99.

3. Truck Impacts

a. Routes

River Road/Vinewood Avenue has been indicated as a potential future truck route. Please justify the rationale for selecting this route over Westside Blvd, east of SR165.

b. Safety

Please evaluate traffic safety at the major intersections along this truck route.

c. Impacts

Please analyze the anticipated impact that the truck traffic will have on the structural section of the Merced County roadways along the proposed truck routes.

4. State Highways

The County's Regional Transportation System is supported by both local roads as well as State highways. The County therefore encourages you to closely coordinate with Caltrans to ensure that the potential impacts to State highways are adequately identified and fully mitigated.

5. Full Mitigation

The County is very concerned that major new development projects fully mitigate their impacts to County roadways. The County has required that regionally significant projects seeking general plan amendments achieve full mitigation. An example of this is the Riverside Motor Sports Project proposed adjacent to the former Castle Air Force Base. For this regionally significant project, which also included amendments to the County General Plan, the County secured an agreement with the project proponent which required full mitigation for road impacts when it was demonstrated that the project would result in a 20% or more increase in traffic to the particular segment or intersection.

Given the significance of the West Park Project and its potential to numerous State and local roadways, the County requests that Stanislaus County pursue a mitigation strategy which achieves mitigation to the fullest extent that is practicable and feasible.

Growth Inducement

The County believes the development of a 4,800 acre industrial park has the potential for regional growth inducement. We therefore request that this analysis be extended to Merced County, particularly the City of Gustine and the unincorporated communities of Delhi, Hilmar, and Stevinson.

Greenhouse Gas Emissions (GHG)

As you are probably aware, the State of California has recently placed a new focus on the California Environmental Quality Act (CEQA) review process as a means to address the effects of GHG emissions from proposed projects on climate change. Recent law (SB 97) amends CEQA to establish that GHG emissions are appropriate subjects for CEQA analysis.

Because the Office of Planning & Research (OPR) has not yet amended the CEQA guidelines for the effects or mitigation of GHGs, lead agencies have the opportunity to provide innovative solutions to this challenge. This is particularly important for the West Park Project due to its regionally significant size, the policy changes to the Stanislaus County General Plan it will require, and the fact that Stanislaus County is not only the lead agency but the project proponent. Merced County will look forward to participating in addressing this important issue through this EIR.

Thank you for the opportunity to respond to the NOP. Merced County looks forward to its continued participation in this project.

Sincerely,



Robert E. Smith
Special Programs Director

RES/tjt

cc: Merced County Board of Supervisors
Demitrios O. Tatum, County Executive Officer
James N. Fincher, County Counsel
Paul A. Fillebrown, Public Works Director
Robert Lewis, Development Services Director