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August 11, 2008

Keith Boggs, Deputy Executive Officer
Economic Development
1010 Tenth Street, Suite 6800
Modesto, CA 95354

SUBJECT: WEST PARK SPECIFIC PLAN NOTICE OF PREPARATION

Dear Mr. Boggs:

Thank you for providing the City of Turlock an opportunity to comment on the proposed project.

PROJECT DESCRIPTION

The County of Stanislaus is proposing to amend its General Plan and Zoning to allow the development of a 4,800-acre industrial business park and inland port in the vicinity of the unincorporated area of Crows Landing. The area is located east of Interstate 5 at the Fink Road interchange and is generally bounded by Marshall Road on the north, State Route 33 and Naval Road on the east, Fink Road on the south and the California Aqueduct on the west. The area is currently designated Agriculture under the County's General Plan and Zoning. The County is proposing to adopted a specific plan and Airport Land Use Compatibility Plan covering the entire area. The County is proposing to develop the area in four phases. The project applicant is required to submit a plan to the County prior to initiating each phase of the project. The County is proposing to conduct a project-level environmental analysis for Phase 1 of the project that involves the development of 1,886 acres, between four and five million square feet of building space, the airfield, sewer and water treatment facilities, and an inland port.

COMMENTS

Phasing:

1. The environmental impact report needs to include more information regarding the entitlement process for future phases and the associated environmental review required to support future approvals by the County. During the scoping meeting held on June 23, 2008, the applicant stated that all General Plan amendments and zoning changes would be entitled through the adoption of the Specific Plan. However, the Notice of Preparation states that the applicant will be required to submit a "plan" for each of the Phases II thru IV. The draft Environmental Impact

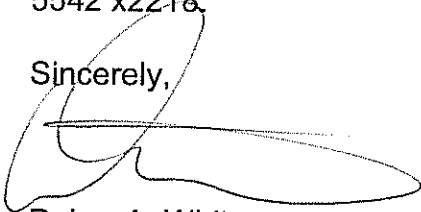
report needs to clearly outline the entitlement process and associated environmental review that will be required prior to implementation of subsequent phases of the project.

Traffic:

2. In Table III, page 13, of the Preliminary Traffic Circulation Master Plan, the report incorrectly reports the City of Turlock level of service standard as "D". The adopted level of service standard for the City of Turlock is LOS "C".
3. The traffic study needs to include a discussion of how truck trips for both the project and background traffic are projected and analyzed. Both the cities of Patterson and Turlock have adopted large industrial business parks within the past two years. Neither of these parks are at full buildout. The impacts of truck trips generated by these parks and the proposed 4,800 acre West Park development need to be cumulatively analyzed.
4. The traffic study does not appear to analyze the impacts of the project on West Main Street or the Hwy 99/West Main interchange. As the preliminary traffic study does identify impacts west of Carpenter, the City requests that this arterial and all intersections leading to the Highway 99 interchange be added to the analysis.
5. The traffic study analyzes arterial level of service does not evaluate the impacts of the project on the operation of individual intersections. The traffic study needs to be revised to include an analysis of all intersections that could potentially be affected by the project. In particular, the City of Turlock requests an intersection analysis of all intersections on West Main between the City of Patterson and the Highway 99/West Main interchange.
6. The draft Environmental Impact Report needs to include a detailed discussion of the planning studies and funding mechanisms that will be used to implement identified traffic mitigation measures. To ensure that mitigation measures will be available as scheduled, development triggers should be tied to completion of planning studies and collection of fees to finance identified improvements.
7. As many of the improvements already identified in the preliminary traffic study suggest that additional right-of-way will be required to implement mitigation measures, any potential impacts of those projects need to be analyzed in the draft Environmental Impact Report as indirect effects of the proposed project.

Please contact me if you have any questions regarding these comments at (209) 668-5542 x2218.

Sincerely,



Debra A. Whitmore
Deputy Director of Development Services (Planning)