

Keith Boggs  
Stanislaus County  
Deputy Executive Officer  
Economic Development  
1010 10<sup>th</sup> Street, Suite 6800  
Modesto, CA 95354

Dear Mr. Boggs,

Enclosed you will find the hard copy of the letter from the West Stanislaus Resource Conservation District Board in response to the Notice of Preparation of the Draft Environmental Impact Report for the West Park Project. As per our conversation on August 11, 2008, I faxed you a copy of our response letter to the NOP per your directions.

If you have any questions regarding this matter, please call the office at (209) 892-3026

Sincerely,



Secretary to the WSRCD Board

P.O. Box 193  
Patterson, CA. 95363  
TEL. (209) 892-3026  
FAX (209) 892-3026



Board of Directors  
*Norman Crow, Chairman*  
*Rob Brooks, Matthew Boulware*  
*Tom Maring, Frank Durao, Ray Murphy*  
Associate Director

**August 7, 2008**

Stanislaus County  
Keith Boggs-Deputy Executive Officer Economic Development  
1010 10<sup>th</sup> Street, Suite 6800  
Modesto, CA 95354

The West Stanislaus Resource Conservation District (WSRCD) board requests the following issues to be addressed in detail, for the upcoming draft EIR for the West Park Project.

The West Stanislaus Resource Conservation District board voted on March 12, 2008 to oppose West Park's development plans at the Crows Landing Navy Base. The board feels the size and scope of the proposed development would have significant negative impacts on the natural resources in and around that area. The Navy Base and surrounding lands are designated as prime farm land. Development on prime farm land would not be consistent in keeping with the best and highest use for that land.

1. PRIME AGRICULTURE LAND: We believe in preservation of prime agriculture land of which the Crows Landing Navy Base is comprised of. This is 100% PRIME farmland that should be protected for agriculture production. This land is irreplaceable. Have other routes and locations been considered that require less PRIME farmland? What are the other alternatives that have been considered? All secondary effects for the conversion of PRIME farm land should be identified and researched. Including the social effects that this project would have on this community. What are the benefits foregone if this PRIME farmland is converted. Consultation with Department of Conservation needs to occur and appropriate mitigation identified and implemented for not just the directly impacted acres but the indirectly impacted acres as well

2. WATER QUANTITY: Proven insufficient ground and surface water in western Stanislaus County for agricultural industrial and municipal use. This area currently has insufficient ground and surface water availability. All aspects concerning water consumption should be addressed. Sources need to be identified. Offsite impacts of this water acquisition need to be identified and addressed both at the source and destination.

A drought contingency plan should be in place to insure further agriculture allocations of water would not be required in drought years.

3. WATER QUALITY: Identify all potential risks to our ground and surface water as a result of this project. Identify and plan opportunities for mitigation for any and all impacts. This includes, storm runoff, offsite water, creeks and impacts to adjacent properties. Detailed water quality reports should be provided to regulating agencies and made public to the surrounding community.

4. AIR QUALITY: Further degradation of air quality due to increased truck, rail and vehicle traffic with the West Park proposal design. In addition to assessing overall air quality impacts a full assessment of local air quality impacts need to be done. Any and all opportunities for mitigation should be identified and implemented. Local health impacts and quality of life impacts should be considered in all assessments.

5. PLANTS AND WILD LIFE: Impacts on major plant and animal communities as well as aquatic and terrestrial ecosystems need to be identified and fully mitigated. Consultation with Department of Fish and Game, U. S. Fish and Wildlife Service and the Army Corp of Engineers should take place. Specifically the impacts of increased water flows to Little Salado Creek need to be addressed. Full consideration of restoration of this creek must be made.

6. ZONING REGULATIONS: The board believes that Industrial Parks belong within cities, not in agricultural farming areas. The zoning laws of the county should be followed by the county and not altered by the Board of Supervisors.

7. INFRASTRUCTURE: Increased vehicle truck traffic will cause higher accident rates with slow moving agricultural equipment. If any county road widening will be proposed or emanate domain actions taken, full compensation or mitigation of these actions need to occur. The procedure for this needs to be transparent and made public. Changes to land values and numbers of homes effected need to be identified and mitigated and fully compensated. Currently extensive irrigation pipelines are required for the existing agricultural businesses in the vicinity. Relocation and disruption of these irrigation lines would impose a great significant cost to the

landowners. Full compensation should occur. Sensitivity to irrigation season should be considered in any construction plans. Will the current train continue to have use of the existing track lines. If not what impacts will this have on that entity?

8. HISTORIC PRESERVATION AND CULTURAL RESOURCES

CONSIDERATION: The existing historic cemetery and school house near the intersection of Ike Crow Road and Bell Road need to be surveyed and protected from any activities. Opportunities for education concerning local history should be explored. Consultation with local historians should occur, co-operation with State Historic Preservation Officer should also occur. Furthermore prehistoric significance of the entire project site should be investigated and surveyed with consultation occurring with tribal liaisons such as the Yokut Indian Tribe.

9. ECONOMIC IMPACT: Impacts to existing local economy need to be identified and assessed. Specifically those impacts to the existing businesses that rely on agricultural customers. Keep in mind that this will include every existing business in this very agricultural area. In response to the estimate in the NOP that the proposed project would generate 37,000 jobs, the board has the following questions.

- Where will these people live?
- How will you insure that this will not trigger additional residential sprawl?
- How will the needed facilities and services such as: Medical, Law enforcement, Fire Protection be addressed?
- Who will bare the expense of these additional taxes to maintain the above stated public services? Typically the residents of an area bare these expenses, but the 37,000 potential employees may not reside here to be subject to taxation.
- In the NOP it is assumed that current commuters to the Bay Area will relocate their jobs to this facility. Typically commuters work in the professional sector, and the created jobs will be largely in the trade industry. Further assessment of this issue needs to take place.
- Impacts from the agricultural products and jobs lost need to be identified and assessed.

10. FOREIGN/EXOTIC PESTS: Shipping containers will likely contain exotic-quarantined pests that will devastate Stanislaus County agriculture. In addition to the minimal inspections occurring at the Port of Oakland, additional measures for inspection and quarantine of these containers and their contents need to take place due to the potential of the possible detriment to our economy, environment, and health in this highly agricultural area. Measures need to be put in place for possible release of pests and a system for containment needs to be used throughout the industrial park.

The purpose of the West Stanislaus Resource Conservation District is to preserve, protect and promote agriculture resources of the Westside of Stanislaus County.

The West Stanislaus Resource Conservation District Board feels that it is imperative that the process of review be very transparent and contracted out to independent third parties without vested interest from any outcome. It appears to the WSRCD board that this has not been the case to date.

Sincerely,



Norman W. Crow

Chairman of the board to the West Stanislaus Resource Conservation District

West Stanislaus Resource Conservation District Board

Ray Murphy  
Thomas J. Maring  
Rob Brooks  
Frank Durao  
Matthew Boulware

The name and address of the contact person to receive future correspondence regarding the project is as follows:

West Stanislaus Resource Conservation District  
P.O. Box 193  
Patterson, CA 95363

Attention Norman Crow  
(209) 988-4570