LETTER AL

STATE OF CALIFORNIA – THE RESOURCES AGENCY
GRAY DAVIS, Governor

DEPARTMENT OF WATER RESOURCES
SAN JOAQUIN DISTRICT
3374 EAST SHIELDS AVENUE
FRESNO, CA 93726-6913

SEP 26 2001

September 25, 2001

Mr. Robert Smith
Merced County
3351 M Street, Suite 240
Merced, California 95348

Subject: County of Merced University Community Plan Draft EIR Comments on Sections 4.6 and 4.8 (SCH# 2001021056).

Dear Mr. Smith:

Our review of these sections concurs with the findings expressed in the report. We agree that the impacts relating to Geology, Soils, Seismicity and Mineral Resources (Sec. 4.6), and Hydrology and Water Quality (Sec. 4.8) are either less than significant or are mitigated to being less than significant. The report adequately addressed the pertinent issues, explains the geologic and hydrologic environment, and accurately estimates the impacts of the proposed development. The following are minor and insignificant comments relating to the above sections. AL-1

Figure S-1: The introductory text describes the project location using roads and highways, including Highway 59, however, this map does not show this highway. AL-2

Page 4.6-1, Fourth Paragraph: The geologic units are described from youngest to oldest. The accepted format for the description of geologic units is always from oldest to youngest. AL-3

Page 4.6-6, Last Paragraph: Their description of the conditions of where subsidence would most likely occur, "Generally, loose, granular soils in areas where there is as deep groundwater table.." is technically incorrect. What are required are confined aquifer conditions and compressible clays. The project location does not have these conditions and has no history of subsidence from groundwater withdrawals. Despite their error their conclusion of low potential for subsidence is correct. AL-4

Table 4.8-3: Within this table and elsewhere in the section the total annual water demand for the project is estimated at 4,550 acre feet per year. This figure may be optimistically low for typical San Joaquin Valley urban land use. It is generally accepted that when agricultural lands are converted to urban land uses in the San Joaquin Valley that the new land use will use approximately the same amount of water as the previous agricultural use. The report states that the existing water use for agriculture is as high as 6,684 acre feet per year. This equates to 3.18 acre feet per acre. Their total demand figure equates to AL-5

about 2.16 acre feet per acre. A total demand figure of closer to 6,000 acre feet per year would be more realistic. To use the higher demand number would not significantly change the impacts to groundwater in the area. AL-5

If there are any questions regarding these comments, please contact Al Steele of my staff at (559) 230-3308.

Sincerely,

Paula J. Landis

Paula J. Landis, Chief
San Joaquin District

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COMMENT LETTER AL: DEPARTMENT OF WATER RESOURCES

Response to Comment AL-1:

The comment agrees with the Draft EIR analysis of pertinent issues, the geologic and hydrologic environment, and estimates of the impacts of the proposed development. No response is necessary.

Response to Comment AL-2:

The EIR text, together with the figures, provides general location information about the project site. More specific information is provided where needed in the technical sections of Chapter 4. For example, Highway 59 is shown on figures in Section 4.14, Transportation.

Response to Comment AL-3:

The comment states that the accepted format for the description of geologic units is always from oldest to youngest. The text on page 4.6-1 of the UCP DEIR indicates that the geologic units at the UCP area are presented from youngest to oldest; therefore, there would not be any confusion to determine the correct sequencing of the geologic units.

Response to Comment AL-4:

Regarding the information presented in the last paragraph on page 4.6-6 of the UCP Draft EIR, DWR provides a technical description of ground subsidence, and confirms that the UCP area does not have a history of ground subsidence due to groundwater withdrawals. DWR confirms that the low potential for ground subsidence at the project site is correct.

Response to Comment AL-5:

As stated on page 4.8-37 of the DEIR, the water demand numbers for the UCP area were calculated by Nolte Associates based on water consumption rates of 55 gallons of water per day per capita, 15 gallons of water per day per employee, and 10 gallons of water per day per student, and approximately 173 gallons per day per single-family dwelling unit in residential landscape irrigation areas.

The potable water consumption rates for the University Community are discussed on page 4.8-37 of the DEIR and are presented in Table 4.8-3 on page 4.8-38. While these numbers might be considered "low" when compared to other existing development, the "mission statement" of the proposed University Community is to promote sustainable development and water conservation. The water conservation rates were determined using water conserving fixtures as standard equipment, and water infrastructure that is starting from "scratch", instead of retrofitting existing

infrastructure. Total water demand calculations also were determined to use a substantial portion of treated wastewater for outdoor irrigation needs. These measures, required by UCP Policies IW 5.1 through 5.9, would ensure that the lower water demand factors are achieved.