

SEP 26 2001

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 Comment's On The Water Issues Of The UC's Community and  
 Campus EIR's For The Record. From all the meetings I've  
 been to, I have been made to understand that both EIR's are  
 really one, so that's how this document is written.

9-23-01

BN-1

S-46 Community EIR

The proposed U.C. could interrupt the flow of water from the  
 UCP area to off-site users, which could affect the ability  
 of those areas to irrigate agricultural properties. Who is  
 giving UC that power, and who makes the judgement if there is  
 a drought, to take the water from the off-site users?  
 (farmers). Who does UC pay for these waters? I see nothing  
 in either EIR that answers this question. Are we, the MID  
 users of Merced Irrigation District water responsible  
 for paying for these bills? Are we giving UC the water?  
 page

BN-2

BN-3

4-8-2. Who averaged the 12" rain fall per year? I do  
 believe you will find the average less than that. We're  
 desert, and it is between 10 and 11 inches.  
 page

BN-4

4-8-5. In 1975 we went into a drought that lasted  
 six years not mentioned in the EIR it was so bad that MID  
 water district turned on cannel's much later than usual and  
 shut them off very early, due to lack of water behind the  
 dams. What will happen to your off-site users when two  
 droughts within a ten year span take place? More droughts  
 of this magnitude have been taking place in the last 30  
 years. I noticed most of your water figures were based on or  
 near El Nino years, interesting.

BN-5

pages  
 4-8-23, 4-8-24 and 4-8-25. Nothing is mentioned about wells  
 on the proposed site for U.C. and the U. C. Community. When  
 are these test wells to be put in? Who will be putting in  
 the test wells? What Hydrologist will be reading the logs  
 on these wells.

BN-6

You Mention The Hunt and Myers property as assuming the  
 wells will be good. Not really, the site has to have these  
 test wells in place before anyone can assume anything,  
 will be good on the site.

BN-7

page  
 4-8-31. Conveyance System and Detention Basins. Who will  
 build them? When will they be built? Who will pay for

BN-8



them? How much will they cost? Who will assure bonds.

page

4-8-39. Expected Ground Water. How will you know anything until the test wells for both community and U.C have been dug, and the logs have been read by somebody who knows what they are doing?

page

4-8-50. Don't plan on a well for each village, ask Planada and Merced.

There is actually close to a two million over draft in the central valley, not one million over draft of our water basin.

What is the safe yield of the underground basin?

What is the accurate yield of the underground basin?

The EIR is not consistent with the Merced County General Plan, which states:

the purpose of using the Urban Centered Concept to plan land use is to ensure that, (1) Growth occurs in an orderly and logical manner, (2) Land is used efficiently, (3) AGRICULTURAL OPERATIONS ARE NOT ELIMINATED PREMATURELY. The EIR unreasonably and inaccurately limits the discussion of ag impacts to prime lands. The discussion must be expanded to include: A. Productive agricultural land: All the cities and townships in the county that depend on underground water for their supply.

The final question is do you want to eat, the best and safest produce in the world? Or do you want imports that use every type of herbicide and pesticider for you and your children to eat regardless of the consequences. Keep grabbing up our farmland like there is no tomorrow, and the water used to grow this produce. Where will we be in situations like we are now facing? Your supposed to be smart people, take a minute and think about that. Food does not grow on market shelves.

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BN-8

BN-9

BN-10

BN-11

BN-12

BN-13

BN-14

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## COMMENT LETTER BN: EASTERN MERCED AGRICULTURAL COALITION

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### **Response to Comment BN-1:**

The University of California's proposed Long Range Development Plan for the UC Merced campus and the University Community Plan are two distinct projects with two EIRs (see Master Response 3). Nonetheless, responses are provided below for each comment as it pertains to the UCP DEIR.

### **Response to Comment BN-2:**

As described on pages 4.15-12 through 4.15-13 of the UCP Draft EIR in Impact 4.15-2, Policies IW 12.1 and 12.2 of the proposed UCP would protect the irrigation needs of off-site agricultural properties by ensuring that agricultural areas would be provided with a continued and uninterrupted source of surface water. Please see also Chapter 2, Revisions to the DEIR for changes to the text.

### **Response to Comment BN-3:**

Please see the Response to Comment BN-2 above.

Neither the proposed University Community nor the UC Merced Campus would require the use of surface water from either the Fairfield Canal or the Le Grand Canal. As stated in the last paragraph on page 4.8-37 of the UCP Draft EIR, the UCP and the Campus projects would rely on groundwater. The Merced Irrigation District would continue to allocate its water from the irrigation canals. Please see also Chapter 2, Revisions to the DEIR for changes to the text.

### **Response to Comment BN-4:**

The rainfall data stating approximately 12 inches of annual rainfall in the Merced area was included in information compiled by Nolte Associates in their *Storm Drainage System Conceptual Plan – Technical Memorandum* (June 15, 2001). The source of the information cited in that document was the National Weather Service, San Francisco Bay Area, Climatological Data, which was obtained from the internet at the following address: <http://www.nws.mbay.net/climate.html>. The link under "30 Year Normals for 384 Sites, Rainfall" indicates that at the Merced Municipal Airport, the average annual rainfall from 1961 to 1990 was 12.01 inches.

### **Response to Comment BN-5:**

Please see the Response to Comment BN-3.

**Response to Comment BN-6:**

The information presented on pages 4.8-23 through 4.8-26 of the UCP Draft EIR under the heading "Groundwater" describes the existing wells at the UCP area. As stated in Response to Comment BN-4, the rainfall data used for the EIR consists of an average from the 30-year period including 1976-82.

UCP Policy IW 1.2 directs that prior to construction of the proposed University Community, the County would "require that an adequate water supply be demonstrated before approving new development." Therefore, prior to development of the University Community, a water resources professional certified to perform pump tests would install groundwater test wells to ensure that an adequate water source is available.

For additional information regarding groundwater resources underlying the project site, please see Master Response 11, groundwater, as well as Master Response 10 for a discussion of water supply.

**Response to Comment BN-7:**

Please see the Response to Comment BN-6.

**Response to Comment BN-8:**

As presented in the first complete paragraph on page 4.8-55 of the UCP Draft EIR, the construction phasing of the storm drainage infrastructure is anticipated to precede each of the Residential Village phases and the Town Center. UCP Implementation Program 4.2 requires the preparation of an Integrated Water Infrastructure Master Plan (IWIMP) prior to submission of the first specific plan. Developers of the University Community would be responsible for the financial aspects of drainage infrastructure, and engineering specifics regarding the storm water conveyance system would be presented during development of the specific plans. Specific implementation programs regarding project financing and specific plans are presented in the Proposed Revisions to the Draft Plan (July 2004) as Implementation Program 1.0 and Implementation Program 6.0, on pages 180 and 207, respectively.

**Response to Comment BN-9:**

Please see Master Response 11 for a discussion of groundwater resources.

**Response to Comment BN-10:**

For additional information regarding water resources in the Merced groundwater basin and recommended water management programs to eliminate overdraft and stabilize groundwater levels at year 1999 levels, please see Chapter 2 of the SDEIR, and Master Response 10 for a discussion of water supply.

**Response to Comment BN-11:**

For additional information regarding water resources in the Merced groundwater basin and recommended water management programs to eliminate overdraft and stabilize groundwater levels at year 1999 levels, please see Chapter 2 of the SDEIR, and Master Response 10 for a discussion of water supply.

**Response to Comment BN-12:**

The safe and accurate yield of the groundwater basin underlying the proposed University Community site is discussed in Master Responses 10 and 11.

**Response to Comment BN-13:**

Consistency with the Merced County General Plan is discussed on page 4.2-25 in Impact 4.2-3 of the Draft EIR. As discussed in the DEIR the determination of the project's consistency with the County's General Plan can only be made by the Board of Supervisors. In addition, the Board must approve a statement of findings that the benefits of the conversion of agricultural land outweigh the impacts of the conversion. The EIR does not limit the analysis to the loss of prime agricultural lands. The loss of productive agricultural lands is discussed on page 4.2-21 in Impact 4.2-1 of the DEIR. Please also see Master Response 7 for a more detailed discussion regarding agricultural resources.

**Response to Comment BN-14:**

Cumulative loss of farmland was addressed in the DEIR on page 4.2-28 in Impact 4.2-4 and was identified as a significant and unavoidable impact. As stated on page 4.2-29, under cumulative conditions, up to 4.7 percent of existing Important Farmland in Merced County could be converted to urban uses if all lands within existing SUDPs, RRCs, and HICs were developed. Therefore, under cumulative conditions, it is anticipated that approximately 95% of existing Important Farmland would not be converted to other uses. The comment's views on herbicides and pesticides in food are hereby forwarded to the decision makers. Please see also Chapter 2, Revisions to the DEIR for changes made to the text.