

The Farmland Working Group

P.O. Box 461 • Ceres, California 95307

LETTER BQ
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Ric Notini Environmental and Permitting Manager
UC Merced
1170 West Olive Ave., Ste. 1
Merced, CA 95348

Robert E. Smith, Planning Director
Merced County, UC Development Office
3351 'M' St., Ste. 240
Merced, CA 95348

Re: Comment on the Draft University Community Plan and its DEIR

Gentlemen:

The Farmland Working Group (FWG) is a broad range of individuals working to preserve the world's most important farmland in our Northern San Joaquin Valley region. The FWG is greatly concerned about the proposed conversion of Important Farmland, as reflected in the proposed UC Community Plan (UCP). Our following comment is directed at the adequacy of the UCP DEIR as well as the proposed allocation of land in the UCP.

Comment on the UCP DEIR and the Draft UCP. The proposed project (the UCP) allocates 1,120 acres of Valley Floor Important Farmland located south of Cardella Road for development, primarily for residential and residential-serving uses. We strongly oppose this proposed UCP allocation of urban development, in-lieu of agricultural land preservation, south of Cardella Road.

However, we acknowledge the need for the UCP's proposed Town Center Business Park and residential uses north of Cardella Road in immediate proximity to the Campus, although such planned uses would convert 986 acres of Important Farmland. In this north of Cardella Road UCP case, we feel the benefits of the proposed development uses in proximity to the University override the significant environmental impact of the future loss of 986 acres of Important Farmland.

BQ-1

BQ-2

BQ-3

The planning area south of Cardella Road should, in our opinion, be permanently preserved for agriculturally-oriented uses such as demonstration growing grounds for UC Merced agricultural and environmental research, botanical gardens, and urban agriculture. In the later urban agriculture case, this land could be an important source for a diversified, organic, locally-produced food supply for the University Community and Campus populations, as well as for the entire Merced-Atwater community.

BQ-4

In regards to the adequacy of the UCP DEIR, we feel that the DEIR did not consider an alternative which could 100 percent satisfy the proposed land use program for the University community, while saving the Important Farmland area south of Cardella Road. We propose that the DEIR add the following alternative and that such alternative be used to revise the proposed project, before the UCP is adopted by Merced County:

- We call such new alternative the Redefined Community Planning Area/Minimum Loss of Important Farmland Alternative.
- The boundary of this alternative's UCP Planning Area would include the same proposed Planning Area in the current Draft UCP but would also designate an appropriate amount of land already planned for development in the general plans of the cities of Merced and Atwater, to equally satisfy the needed land use program of the full-size University Community.
- The reallocated UCP uses in the to-be-developed area(s) of these cities' general plans would be compatible overlay land use designations.
- For the current University Community Planning Area south of Cardella Road, this new UCP DEIR alternative would show a Permanent Agricultural land use designation, as would the revised UCP.
- The revised DEIR would also include appropriate mitigations and the revised UCP would propose policies which together would permanently protect the south-of-Cardella Road Planning Area for agricultural uses.

BQ-5

We respectfully ask that the EIR preparers and Merced County officials give serious consideration to the foregoing comment and proposed DEIR and UCP revisions.

Sincerely,



Jeani Ferrari, President FWG

**COMMENT LETTER BQ: JEANI FERRARI
THE FARMLAND WORKING
GROUP**

Response to Comment BQ-1:

The background of the FWG and concern associated with the potential conversion of Important Farmland is hereby forwarded to the decision makers.

Response to Comment BQ-2:

Impact 4.2-1 on page 4.2-21 of the Draft EIR addresses the loss of farmland. As noted in Table 4.2-3 on page 4.2-5, there is a total of 1,436 acres of Important Farmland identified on the project site (please see Chapter 2, Revisions to the DEIR for changes made to the DEIR text). As discussed on page 4.2-21, the loss of Important Farmland would result in a significant and unavoidable impact of the UCP. Please see also Master Response 7 for a discussion of agricultural resources. The comment's opposition to developing agricultural land south of Cardella Road is hereby forwarded to the decision makers.

Response to Comment BQ-3:

The comment's support of the Town Center, Business Park and residential uses north of Cardella Road, close to the Campus, is hereby forwarded to the decision makers.

Response to Comment BQ-4:

The comment supporting preserving the area south of Cardella Road for agriculturally-oriented uses is hereby forwarded to the decision makers. The DEIR analyzes three alternatives that do not involve development south of Cardella Road.

For additional information regarding the authority of the Board of Supervisors and regarding agricultural resources, please see Master Responses 4 and 7.

Response to Comment BQ-5:

The Farmland Working Group has suggested an additional alternative be evaluated in the DEIR. The alternative proposed by The Farmland Working Group would maintain the same boundary as the proposed UCP while designating an equal amount of land in the cities of Merced and Atwater with compatible overlay land use designations to allow for development. As part of the UCP, the area south of Cardella Road would be designated Permanent Agricultural.

Locating UC Merced-induced population and growth in the City of Merced and Atwater is inconsistent with project objectives for the development of a cohesive, integrated, and vital campus and community that is recognized as an essential element for a successful campus environment. Substantial physical separation of the Campus and Community would result in substantial impacts on traffic, noise, and air quality and fail to meet community livability and “smart growth” objectives (refer to Master Response 1). Further, the County of Merced does not have jurisdiction for land use designations within the corporate boundaries of cities. Moreover, the City of Merced General Plan does not provide capacity for the growth induced for a 30- to 40-year period by UC Merced (please see Master Response 1).

The DEIR evaluates three alternatives (No Loss of Prime Farmland, No Loss of Prime Farmland/Reduced Community Size, and Reduced Community Size and Population) that do not assume development south of Cardella Road. There would be no difference in the environmental conclusion regarding loss of Prime Farmland that would differ from these three analyses provided, because the FWG’s alternative results in a similar land use pattern (ie., development north of Cardella). For these reasons, there is no compelling reason that an additional alternative should have been evaluated in the DEIR (see Master Response 1).