

LETTER BV

OCT - 4 2001

MERCED AREA GROUNDWATER POOL INTERESTS

c/o Ted Selb, Chairman
Merced Irrigation District
720 West 20th Street
P. O. Box 2288
Merced, CA 95344

October 2, 2001

Robert E. Smith, Planning Director
Merced County UC Development Office
3351 "M" Street, Suite 240
Merced, CA 95348

Ric Notini, Environmental & Permitting Mgr.
University of California, Merced
1170 West Olive Avenue, Suite 1
Merced, CA 95348-1959

Re: Merced County University Community Plan
UC Merced Campus Long Range Development Plan
Draft Environmental Impact Report(s) (DEIR)

Gentlemen,

The Merced Area Groundwater Pool Interests (MAGPI) Board of Directors, at their regularly scheduled meeting held on September 19, 2001, directed the MAGPI Chairman to provide written comments to Merced County UC Development Office and the University of California Merced Environmental & Permitting Office, specifically addressing groundwater issues within the broad category of hydrology and water quality, in association with the above-referenced project DEIR's.

MAGPI, formed in 1997 under the authority of the California Groundwater Management Act (AB3030), is made up of water purveyor agencies within the Merced Groundwater Basin, as identified in the California Department of Water Resources Bulletin 118 (dated September, 1975). Generally described, the Merced groundwater basin is approximately 500,000 acres in area, bordered by the Merced River to the north, San Joaquin River to the southwest, the Chowchilla River to the southeast and the Merced/Mariposa county line to the east. The agencies within MAGPI include: the County of Merced; Merced Irrigation District; the cities of Merced, Atwater & Livingston; LeGrand-Athlone, Merquin County, Turner Island and Stevinson Water Districts, Winton Water & Sanitary District; the Planada and LeGrand Community Services Districts; the Black Rascal and Meadowbrook Water Companies. The East Merced Resources Conservation District is a member at large.

In addressing hydrology and water quality issues, both DEIR's make reference to and/or summarize/cite from the 1995 Merced Water Supply Plan, a regional conjunctive use water planning document prepared by CH2M Hill for the City of Merced and Merced Irrigation District. The plan recommends stabilizing groundwater at 1992 levels through a program of water conservation, increased surface water sales, the conjunctive use of surface water and groundwater, and the construction of intentional groundwater recharge basins within the study area. In 2000, the University of California, Merced joined the City of Merced and Merced Irrigation District in contracting with CH2M Hill to update the 1995, due to various factors, one of which being the siting of the tenth University of California campus in the Merced groundwater basin (study area).

BV-1

BV-2

At a recent joint public workshop session of the Merced Irrigation District Board of Directors and the City Council, City of Merced, on August 20, 2001, CH2M Hill made a presentation summarizing findings of the 2001 Water Supply Plan Update, which is not yet available. One specific finding presented was that the projected UC Merced water use, through 2040, will have a "negligible effect" on the total water demand of the study area (Merced groundwater basin), being 1% of the total demand. The 2040 water demand projection includes:

Urban	118,000 AF
Agriculture	
Inside MID	384,000 AF
Outside MID	<u>658,000 AF</u>
Total	1,160,000 AF

UC Merced (1% of Total) 7,400 – 11,700 AF (1% of Total Demand)

Although the plan's finding addresses groundwater basin-wide water supply impacts of the campus and community within the study area, it does not, however analyze specific site-related impacts to water supply, specifically groundwater. Therefore, the MAGPI Board of Directors recommends that both final EIR's contain site-specific evaluations of the projects' long-term extraction of groundwater for the campus/community and the surrounding area. The evaluations should include how the projects groundwater extraction might adversely impact existing and future local agricultural groundwater supplies as well as private/community domestic wells and the City of Merced's local well network. Appropriate mitigating measures including groundwater monitoring should be included in the final EIRs to insure that any groundwater extraction impacts are reduced to "*less than significant levels*". Furthermore, specific soils analysis should be undertaken to identify any local areas favorable to intentional recharge, if any. Areas with shallow hardpan lenses be potential recharge sites if the hardpan could be removed and underlain by suitable permeable soils. Those areas should be protected from development through zoning or ordinance.

MAGPI appreciates the opportunity to comment on the above-referenced documents. If you have any questions, you may contact me by telephone at (209) 722-5761, or by email at tselb@mercedid.org.

Sincerely,



E. C. "Ted" Selb III

Chairman, Merced Area Groundwater Pool Interests

Cc: MAGPI Member Agencies

**COMMENT LETTER BV: MERCED AREA GROUNDWATER POOL
INTERESTS (MAGPI)**

Response to Comment BV-1:

The comment provides information on MAGPI. No response is required.

Response to Comment BV-2:

The comment acknowledges that both the University Community and the UC Merced Campus EIRs make reference to and/or summarize/cite the 1995 Merced Water Supply Plan. The comment also makes reference to the preparation of the Updated Merced Water Supply Plan. The 2001 MWSP was described in Chapter 2 of the SDEIR. No further response is required.

Response to Comment BV-3:

Please see Master Response 10 for a discussion of water supply. Please see Master Response 11 for a discussion of groundwater resources.

Response to Comment BV-4:

The issue of site-specific impacts to groundwater, especially local, domestic wells near the UCP area, was the focal point of additional technical studies undertaken by the County during the preparation of this Final EIR. As a result of those studies, the County revised the Hydrology and Water Quality chapter of the DEIR, and made it available for public review as part of the SDEIR published in July 2004.

For additional discussion effects on groundwater resources, please see Master Response 11. Upon preparation of Specific Plans for the University Community, soils analyses will be prepared to identify local areas favorable for recharge. As discussed in the third complete paragraph on page 4.8-49 in Impact 4.8-4 of the UCP Draft EIR, UCP Policy IW 4.3 would require, if feasible, the creation of groundwater recharge basins consistent with local and regional groundwater recharge programs.