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## MASTER RESPONSE 8: ALTERNATIVES

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A number of comments state that the alternatives analysis is inadequate because it does not consider other locations for the campus and community. Another expressed concern is that the EIR alternatives should parallel or meet the requirements for alternatives analyses under the National Environmental Policy Act and/or the Section 404(b)(1) Alternatives Analysis required by the Clean Water Act for fill of "waters of the U.S." (e.g., jurisdictional wetlands).

As stated on page 5-1 of the DEIR, the purpose of the alternatives evaluation in an EIR, pursuant to Section 15126.6(a) of the CEQA Guidelines, is to "describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives." Further, "the discussion of alternatives shall focus on alternatives capable of eliminating any significant adverse environmental effects or reducing them to a level of insignificance, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly" (CEQA Guidelines Section 15126.6(b)). Among the factors that may be used to eliminate alternatives from detailed consideration in an EIR are... "(ii) infeasibility" (CEQA Guidelines Section 15126.6(c)). The feasibility of an alternative may be determined based on a variety of factors including, but not limited to, site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries, and site accessibility and control (CEQA Guidelines Section 15126.6(f)(1)). The determination of feasibility under CEQA is distinct from the determination of "practicability" under Section 404 of the CWA in that feasibility reflects local land use planning and consistency, and often social and economic factors typically not considered as part of the Section 404(b)(1) test for practicability. The University submitted its Section 404(b)(1) alternatives analysis for the UC Merced project to the USACE in February 2004. The selection of alternatives for review in the EIR does not limit the range of alternatives that may be considered in the federal permitting or related NEPA processes.

The Draft EIR contains a discussion of 17 alternatives and their relationship to project objectives. The alternatives presented in the Draft EIR are intended to present options for achieving the basic goals of the project while avoiding or minimizing environmental effects of the proposed UCP (consistent with Section 15126.6 of the State CEQA Guidelines). As discussed on page 5-1 of the Draft EIR, for a project of the size and complexity of the University Community Plan, a reasonable range of alternatives necessitates consideration of alternatives to the size, configuration and location of the University Community. In order to reduce the most notable environmental effects of the UCP (e.g., loss of agricultural and biological resources, increased population leading to increases in traffic congestion, and air pollutant emissions and physical effects associated with the increased demand on services), the Draft EIR evaluates the comparative environmental effects of alternatives to the UCP that would be smaller in terms of acreage, smaller in terms of population, and with different boundaries than the proposed UCP.

The six on-site alternatives evaluated in the Draft EIR are:

- **No Loss of Prime Farmland Alternative:** Reconfigure the UCP to avoid conversion of prime farmland without reducing the overall size and capacity of the UCP (see pages 5-5 to 5-13 of the Draft EIR);
- **No Loss of Prime Farmland/Reduced Community Size Alternative:** Reconfigure the UCP to avoid conversion of prime farmland by reducing the overall size and capacity of the UCP (see pages 5-14 to 5-22 of the Draft EIR);
- **Limited Loss of Prime Farmland Alternative:** Reconfigure the UCP to reduce, but not eliminate conversion of prime farmland without reducing the overall size and capacity of the UCP (see pages 5-22 to 5-25 of the Draft EIR);
- **Reduced Community Size Alternative:** Reduce the size and population of the University Community (see pages 5-26 to 5-30 of the Draft EIR);
- **Increased Community Size and Population Alternative:** Increase the size and population of the University Community to respond to an increase in the size and population of UC Merced (see pages 5-30 to 5-32 of the Draft EIR; also, see discussion of Larger Main Campus/Increased Population Alternative in the UC Merced 2001 LRDP Draft EIR); and
- **Reduced Residential Density Alternative:** Reduce the population of the UCP without reducing the overall size (see pages 5-26 to 5-30 of the Draft EIR).

Because the primary objective of the UCP is to support the development of the UC Merced campus, several of the alternatives were designed to allow the UCP to respond to alternatives for the UC Merced 2001 LRDP. The DEIR includes alternatives for a smaller UCP that roughly correspond to reductions in the size and/or population of the campus as explored as alternatives in the LRDP EIR. The Increased Community Size Alternative (pages 5-32 to 5-40) was analyzed in response to the LRDP EIR's larger campus alternative.

Similarly, there are off-site alternatives for the UCP that correspond to off-site alternatives examined for the campus. The degree of correspondence of the analysis of off-site alternatives in the UCP Draft EIR and the UC Merced LRDP Draft EIR reflects the fact that the County and UC Merced collaborated on an exploration of alternative site locations in eastern Merced County as part of the regulatory permitting process, and is not intended to limit the discretion of the Board of Supervisors in its consideration of the UCP. However, as stated on page 4.9-14 of the DEIR, UCP Policy LU 2.1 states that the UCP area will not be developed without the campus. Further, while the UCP alternatives have been developed to respond to the UC Merced campus alternatives, the selection of one alternative for the campus would not necessarily determine the selection or appropriateness of any specific alternative for the UCP. For example, the County could select another site consistent with the General Plan, select a smaller alternative, select an alternative configured differently from the proposed project, or select the No Project Alternative.

Several comments suggest that the UCP DEIR should have considered alternatives outside of Merced County. The County, however, cannot choose to develop a University Community anywhere but within the County's jurisdiction.

As demonstrated above and in Chapter 5 of the DEIR, a reasonable range of alternatives is presented in the DEIR. The alternatives adhere to most, but in some cases not all, of the primary

project objectives. For the most part the alternatives would reduce significant project impacts. Some alternatives that would not reduce or eliminate environmental impacts are presented and analyzed in response to University alternatives for the campus, as explained above. The larger alternative also serves to “bracket” the project by providing a range of development assumptions. Finally, the DEIR evaluates a range of off-site alternatives that would complement the University, should the Regents ultimately choose to build the campus at an alternate location. As required by CEQA Guidelines Section 15126(d)(2), the DEIR also identifies an environmentally superior alternative. The No Loss of Prime Farmland/Reduced Community Size Alternative and the Reduced Community Size and Population Alternative, which are identical in configuration, acreage and population, were identified as the environmentally superior alternatives (see page 5-90 of the DEIR). For these reasons, the alternatives chapter provided in the DEIR meets the requirements of CEQA.