

Scoping Report for UC Merced Environmental Impact Statement

Prepared for:

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UC Merced EIS Scoping Report

Code Key for Source and Level of Effort for Public Scoping Database

Source

Code Letters

Source

BA	Biological Assessment
PN#1	Public Notice for the Campus Project 199900203
PN#2	Public Notice for the Infrastructure Project 200100570
NOI	Notice of Intent to prepare a Draft EIS
SM	Transcript from the EIS Public Workshops/Scoping Meetings April 18, 2002

Level of Effort

Code

Level of Effort

1	Easily Addressed: existing data readily available
2	More Difficult to Address: existing Data not as readily Available
3	Difficult to Address: additional data collection required
4	Not within the Scope of the EIS
5	Noted

UC Merced EIS Scoping Report

Index of Topics

Air	1
Alternatives	2
Cultural Resources	8
Environmental Justice	8
Fisheries and Aquatic Resources	9
Geology and Soils	9
Hydrology	9
Land Use	10
Navigation	12
Noise and Vibration	12
Physiography and Topography	12
Public Health and Safety	12
Public Services	12
Purpose and Need	13
Recreation	13
Socioeconomics	14
Special Status Species	16
Traffic and Transportation	19
Visual Resources	20
Water Resources	20
Wetlands	24
Wildlife and Vegetation	31
Cumulative, Indirect and Induced Impacts	32
Other Comments	33

UC Merced EIS

Scoping Report: Public Comment Database

Author & Agency Tab & Document #	Source	Comment (summary)	Level of Effort
Air			
E. Manzanilla, Director, Cross Media Division, US EPA	NOI	<ul style="list-style-type: none"> Merced County is currently in serious non-attainment for federal and state standards for ozone and particulate matter less than ten microns in diameter (PM₁₀). 	5
		<ul style="list-style-type: none"> The EIS should discuss, and quantify where feasible, short-and long-term emissions of criteria pollutants from implementation of the proposed project. Do the construction and/or operation emissions conform to the applicable State Implementation Plan? 	1
		<ul style="list-style-type: none"> Mobile emissions from increased traffic, directly or indirectly resulting from this project, should also be addressed, including whether “hot spots” or localized violations of CO or PM₁₀ would be created. 	1
		<ul style="list-style-type: none"> Consider and discuss opportunities for reducing air quality impacts by incorporating transportation approaches that reduce emissions, and energy conservation measures for each alternative. 	1
		<ul style="list-style-type: none"> In affected environment section, include and discuss the new eight-hour ozone standard, as well as the new PM_{2.5} standard. 	1
		<ul style="list-style-type: none"> To reduce construction-related air quality impacts, we recommend minimizing diesel emissions by reducing the use of diesel-powered equipment, requiring contractors to keep equipment fine-tuned, or using alternative fueled vehicles. Identify mitigation measures to be implemented on smog-alert days. Identify sensitive receptors in the project area, and schedule construction to minimize impacts to these populations. Include fugitive dust control plan. 	5

UC Merced EIS Scoping Report: Public Comment Database

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Alternatives			
B. Allayaud, State Legislative Director, Sierra Club California	PN#1 PN#2	It further violates the regulatory process by severely limiting the “choice of reasonable alternatives” to sites in Merced County, excluding other San Joaquin Valley locations which were part of the site selection process and which are reasonably likely to prove the LEDPA.	5
L. Miller, San Joaquin Raptor Rescue Center	SM	C1: Alternative site identification should be opened up to include a broader area, such as Fresno County and counties further north, in order to comply with LEDPA requirements.	4 ^a
F. LaRiviere, Citizens Committee to Complete the Refuge	PN#1 PN#2	<ul style="list-style-type: none"> The applicants have failed to rebut the presumption that there is a least environmentally damaging practicable alternative. We support the EPA’s statement that if the UC and County wish to include the reserve in the alternatives analysis, the reserve must also be included in the 404 permit application. They must provide adequate justification for the size and location of the reserve, and assess both the practicability and environmental impacts associated with the reserve. Other potential alternative sites were eliminated from consideration because they were determined to have identical or greater wetland impacts. However, substantive information regarding the quality of wetlands that would be impacted at alternative sites was not provided thereby failing to comply with Guidelines at 40 CFR Part 230.5(c). 	5 5 5
L. Macedo, President, Merced County Farmlands & Open Space Trust	PN#1 PN#2	The proposed campus community planned for the north-south alignment along Lake Road to Yosemite Avenue is unacceptable because of the loss of productive farmland and the cumulative affects on the intensively farmed eastern Merced County region.	5

^a The Corps has approved a project purpose statement that establishes the geographic scope of the analysis for the EIS as Merced County. As such, the EIS will address a range of alternatives within Merced County and does not include sites outside of this area.

UC Merced EIS Scoping Report: Public Comment Database

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K. Delfino, Defenders of Wildlife	PN#1	• By narrowing the project's purpose to Merced County, the UC	5
	PN#2	Merced application is unreasonably narrowing the range of alternatives that should be analyzed by the Corps.	
		• Since Phase I will require substantial public investment without the guarantee that the Corps will approve the Campus in its current location, we urge the applicants to revised their application to include an analysis of Phase I for both environmental and fiscal reasons.	5
D. Magney, Board Member, California Native Plant Society	PN#1	• A full 404(B)(1) alternatives analysis needs to be performed.	5
	BA	• The corps should be considering all aspects of the project under one permit, which should include the Campus Parkway and the Campus Community, as well as the Main Campus. Separating them as separate projects is a form of piecemealing.	5
L. Miller, San Joaquin Raptor Rescue Center; S. Burke, Protect Our Water	PN#1	• The alternatives analysis for the UC Merced Project is not broad	4
	PN#2	enough in Geographic scope, being limited to Merced County. At least include the UC San Joaquin Valley campus.	(see footnote a)
E. Hoover, State of California, LLM	PN#1	• The Land Reserve is intended for future development and as such must be analyzed for impacts to waters associated with it.	5
	PN#2	There are less damaging practicable alternatives that could be constructed cheaper and faster. Aside from Hill AFB, there are probably 500 sites in the central valley alone that could be acquired and developed into a UC Campus.	5
Members of the Society for Conservation Biology, Chapter at UC Davis	PN#1 PN#2	• The UC Merced Campus Section 404 permit application offers an inadequate alternatives analysis by not considering the option to move the campus and land reserve one-half mile south of its	5

**UC Merced EIS
Scoping Report: Public Comment Database**

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		<p>proposed location, onto land which does not contain vernal pool wetlands.</p> <ul style="list-style-type: none"> • An adequate alternatives analysis would also consider locating the campus community closer to the town of Merced to promote in-fill development. • We believe that submitting separate Section 404 permit applications for aspects of the same project (a campus and a road to access the campus) constitutes a failure to comply with the intent of both the Clean Water Act and CA Environmental Quality Act. These environmental laws mandate that proposed projects include an analysis of the cumulative impacts associated with a project. Disclosure of both components of this project in a single permit application would allow a fair and complete assessment of the environmental and water-related impacts of the proposed campus and related infrastructure (roads, housing, and community). 	<p>5</p> <p>5</p>
M. McCorry, McCorry Ranch, Planada, CA	PN#1	There were and still are other sites that would be less environmentally disastrous to the vernal pools and fragile ecosystem that make up the proposed site. Why wasn't Castle fully explored or an already urbanized downtown Fresno (that possesses the infrastructure to support a major university)?	5
K. & R. Fullen, Elk Grove, CA	PN#1 PN#2 NOI	The permit application fails to document that a LEDPA analysis has been completed for the project site. Surely other sites are available in Merced County that would have fewer impacts to wetlands and endangered species.	5
R. and M. Furey, Planada, CA	NOI	<ul style="list-style-type: none"> • As far as sites, Bellevue Ranch is a good site. The City of Merced incorporated it into its sphere of influence about ten years ago. The UC would be next to Merced Community College and close to the 	5

**UC Merced EIS
Scoping Report: Public Comment Database**

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		<p>High School. There would be no leap frog development, the infrastructure needed would not be nearly as costly, the sewer line would be right there ready to hook up. Merced will have to improve their sewer system, but they would have to do so anyway.</p> <ul style="list-style-type: none"> • Fresno is a good site, everything is set up and ready to go there, including a water plan that is up and running. • Castle Air Force Base would have been perfect. 	<p>4 (see footnote a) 5</p>
L. Lewis	PN#1	<p>Why is this project being placed in a sensitive and beautiful environment? The City of Merced seems to be a better choice for a university.</p>	5
R. Felch, President, Merced County Farm Bureau	PN#1 PN#2	<p>The MCFB board of directors maintains a position that a configuration for the community that stops at Cardella Road and proceeds to the west over Lake Road is superior to the configuration presented in both the UC Community Plan and the Draft EIR in terms of the preservation of agricultural land.</p>	5
C., High	PN#2	<p>How can the two PNs and the Campus Parkway be issued as separate PNs? Isn't that piece-mealing?</p>	5
B. Allayaud, State Director, Sierra Club California	PN#1 PN#2 BA	<p>We do not believe that the current site proposed will qualify as LEDPA. While we applaud the Corps in moving forward to complete an EIS, NEPA's required "hard look" at alternatives is insufficient to satisfy 404(b)(1) and we urge you to require the university to prepare a full and legal LEDPA analysis.</p>	5
A. Strauss, Director, Water Division, US EPA	PN#1 PN#2	<p>The applicants have available to them a wide variety of alternatives for reconfiguring their development plans at their preferred site (and on nearby properties) to avoid unacceptable impacts to aquatic resources. We believe the goals can be met - to build the campus and to avoid further loss of wetlands. We respectfully object to the issuance of</p>	5

UC Merced EIS Scoping Report: Public Comment Database

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		permits for the proposed projects on the basis that authorization may have substantial and unacceptable impacts on aquatic resources of national importance and will result in significant degradation to aquatic resources.	
E. Manzanilla, Director, Cross Media Division, US EPA	NOI	The EIS should identify and evaluate a reasonable range of alternatives for the proposed UC campus, and should provide a clear basis for the elimination of alternatives which were not evaluated in detail. The document should discuss potential environmental impacts of the alternatives in comparative form, thus sharply defining the issues among the option for decision-makers and the public.	5
W. Nasti, Regional Administrator, US EPA	PN#1 PN#2	<ul style="list-style-type: none"> <li data-bbox="737 716 1671 976">• The applicants have identified Merced County as the location for the project. EPA agrees that the range of alternatives currently being assessed is a reasonable range for the purposes of the Guidelines. The applicant must justify why alternatives outside of Merced County were not considered in the alternatives analysis. EPA will not object to the project purpose statement as written, with additional justification regarding the geographic scope of analysis. <li data-bbox="737 976 1671 1089">• To avoid permit denial, the applicants must submit an alternatives analysis demonstrating that their proposed project location is the LEDPA. <li data-bbox="737 1089 1671 1382">• Since the UC is requesting that we assume the reserve is needed for future development, it is necessary to analyze all the practicable options for relocating some or all of the reserve out of the high quality vernal pool habitat present in the current reserve site. For the purposes of the Guidelines, the UC must provide adequate information to demonstrate that it is necessary to have the campus adjacent to the preserve, or the UC must develop the alternatives analysis without the preserve being located directly adjacent to the 	5

**UC Merced EIS
Scoping Report: Public Comment Database**

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		<p>community and the campus.</p> <ul style="list-style-type: none"> • In order to consider a community necessary to support the university, sufficient justification regarding the size, location, and environmental impacts associated with the community must be provided. • An alternatives analysis was not included and must be submitted at a later date to justify the size and location of the infrastructure. To demonstrate compliance with the Guidelines, the County must justify the size, location and environmental impacts of the community, in order for the community-related infrastructure to be considered as part of the application by the County. 	<p>2</p> <p>5</p>
B. Allayaud, State Legislative Director, Sierra Club California	NOI	We are concerned that the off-site selection alternatives were biased in favor of rural sites and against urban in-fill sites. In particular, the analysis of the urban Fresno and Clovis alternatives was inadequate and perfunctory.	5
L. Miller, San Joaquin Raptor Rescue Center; S. Burke, Protect Our Water	NOI	<ul style="list-style-type: none"> • The geographic scope of the alternatives analysis must be much broader. The project in this case is a UC campus in the San Joaquin Valley, not a UC Merced campus. • The implications of associating a campus with existing infrastructure must be considered. 	4 (see footnote a)
C. Witham, VernalPools.Org	NOI	There appear to be significant amounts of non-prime agricultural land in these areas with minimal wetlands, and where habitat has been largely isolated by freeways and canals. Adequate descriptions of on-site alternatives must specify building heights since the university has applied for a permit to build a low-rise, maximally sprawling campus in spite of requirements to minimize impacts to the greatest degree practicable. Building heights for alternatives should be compared to a benchmark of building heights at the most compact UC campus, which is an	5

**UC Merced EIS
Scoping Report: Public Comment Database**

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		empirically practicable standard.	
G. Wellman, UC Project Director, County of Merced	SM	C: Would you speak to the issue of practicability on the LEDPA and how that might relate to the loss of prime agricultural land to the south as has been mentioned? Do you have any type or other analogous project that has involved prime farmland that you can think of offhand? R: Prime farmland is a public interest factor that will be addressed. No, I'm not aware of an analogous project.	5
S. Burke, Protect Our Waters	SM	C: The land reserve, as far as I understand, would eventually be developed. So will the impact to wetlands in that area be part of this analysis? R: They're talking about developing those lands in 25 to 50 years. So at this point, we don't have a plan for discharge of material into those lands. The document will discuss to some level what might occur in that area and the potential foreseeable impacts associated with the project.	5
Cultural Resources			
NO COMMENTS			
Environmental Justice			
E. Manzanilla, Director, Cross Media Division, US EPA	NOI	The EIS should fully analyze whether the project has disproportionately high, adverse environmental, human health, or social impacts on minority or low-income communities in the study area, and discuss opportunities for affected communities to provide input into the NEPA process.	2
O. Aguilar, Green Line Institute	SM	C1: Does the Corps have any special process or special analysis for considering low-income populations? Do you have any special measurement tools that really keep in mind low income and underserved populations?	2

**UC Merced EIS
Scoping Report: Public Comment Database**

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B. Owens, Merced, CA	SM	If the UC comes here, it will raise the level of housing costs. It will in fact drive out the poorest portion of the population because they won't be able to afford to live here. If you make our land so expensive or so valuable to own for development of real estate, it's going to make it impossible for us to continue farming and providing jobs for these people that the educational people are saying are the underrepresented.	5
Fisheries and Aquatic Resources			
NO COMMENTS			
Geology and Soils			
L. Miller, San Joaquin Raptor Rescue Center; S. Burke, Protect Our Water	NOI	The soils in the eastern corridor are some of the oldest in the world and must be considered as a natural resource, and potential impacts therefore regarded as would impacts to any other natural resource.	2
Hydrology			
J. Mitchell	SM	C1: Will trenching for utilities or foundations at the golf course affect the strata where there are rock fractures and affect vernal pools in another area? What is the remedy if this occurs? R1: In the DEIS, there will be a hard look at indirect impacts such as the affects on the flow of water on the surface and subsurface.	3
		C2: Will studies be conducted for Phase I, on the golf course? R2: If there is no 404 permit action for Phase I, then no study would be required.	5

**UC Merced EIS
Scoping Report: Public Comment Database**

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Land Use			
B. Carpenter, UC Merced Committee	SM	Ag land preservation is certainly an issue.	5
L. Macedo, President, Merced County Farmlands & Open Space Trust	PN#1 PN#2	No mitigation for lost farmland is provided as part of the UC Merced project. The dedication of agricultural conservation easements, or equivalent in-lieu of fees, has been recognized as a viable mitigation measure for the loss of viable agricultural land. It is important that the impacted land be replaced at a ratio greater than one to one so that sufficient agricultural land may be preserved from future growth and development impacts.	5
M. Giampaoli, Eastern Merced County Agricultural Coalition	NOI	<ul style="list-style-type: none"> I am concerned about how UC’s impact on the land in and around the campus will be “mitigated.” It seems to me that the mitigation will consist of placing restrictions, such as an ill-conceived NCCP on tillable production agriculture land or enforced bans on development, on property nowhere near the campus or the campus community. No real thought has been put into how the building of a new city astride the Le Grand canal will affect the water supply to our farms. The University Community must not seize control over the waters of Lake Yosemite. Our agriculture ground is sacred supplying food and national security to our nation 	5 5
L. Bocks, California Women for Agriculture	NOI	<ul style="list-style-type: none"> We feel that the campus community should be moved off of farmland and that the entire project including the campus parkway should be mitigated for the loss of farmland. The parkway would be built as close to the city limits of Merced as possible and that no development of any kind should be allowed east of the Campus Parkway. We recommend mitigation for agricultural land converted to urban 	5 5

**UC Merced EIS
Scoping Report: Public Comment Database**

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		uses at a minimum of 4:1 for the Campus Parkway Project, the proposed Campus Community, and the proposed University Campus. We maintain that the 4:1 mitigation be in the form of Agriculture Conservation Easements held by the Merced County Farmlands and Open Space Trust.	
R. Felch, President, Merced County Farm Bureau	PN#1 PN#2	MCFB recommends mitigation for all agricultural land converted to urban uses at a minimum of 3:1. At least three comparable acres should be identified as mitigation for each acre of agricultural land.	5
E. Manzanilla, Director, Cross Media Division, US EPA	NOI	The EIS should discuss existing land use in the region, and identify any areas designated as prime farmland or farmland of state importance which could be impacted by the project. The EIS should address direct impacts to agricultural land, as well as indirect and cumulative impacts from the induced development associated with the project.	5
J. Lesch, Director of Development Services, City of Merced	SM	C1: The location of the one-acre lot rural residential center county land use designation between the City and the proposed campus and community could be an obstacle for the connectivity that we're looking at between the campus and the City of Merced. Any shift to the south would impact agriculture lands. We have some very strong policies in the Merced General Plan about the protection of ag land in the whole corridor, east of Lake Road, actually all the way down to Highway 140.	5
K. Perkins, Merced County Board of Supervisors	SM	I feel this site is the best site and I have a great concern about moving the site to any place else because of the fact that one of our major industries is agriculture. To move this campus further south I think would really be a tremendous loss to that industry, which I certainly wouldn't want to happen.	5
B. Owens, Merced, CA	SM	There's going to be a constant battle between agriculture and the urban boundary. Agriculture comes with its own set of detriments that we put up with, which include toxic sprays, dust, smells from dairies, the sort of	5

**UC Merced EIS
Scoping Report: Public Comment Database**

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		thing that the people that move here find offensive and then complain about.	
R. Wood, Atwater, CA	SM	Urban encroachment on the farmland of the great Valley of California is a primary concern. The original campus site was selected to provide for the campus and the community located on non-prime seasonal grazing land. The profit of the development was going to an educational scholarship trust. A better win-win is hard to imagine. It is imperative that local governments do their utmost to preserve this non-renewable resource [productive farmland].	5
Navigation			
NO COMMENTS			
Noise and Vibration			
NO COMMENTS			
Physiography and Topography			
NO COMMENTS			
Public Health and Safety			
NO COMMENTS			
Public Services			
NO COMMENTS			

**UC Merced EIS
Scoping Report: Public Comment Database**

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Purpose and Need			
E. Manzanilla, Director, Cross Media Division, US EPA	NOI	The Purpose and Need should describe the problem to be solved, why it is important to take action now, and why the proposed project should be built in a specific location.	5
J. Gamboa, Executive Director, Greenlining Institute	PN#1 PN#2	<ul style="list-style-type: none"> • There is a critical need for this campus in a community that suffers from high unemployment and a poor economy. • Representation of Latino and other minority students from the Valley at the University of California lags significantly behind other areas of the state. 	5 5
M. Butts	PN#1 PN#2	Merced residents have several colleges less than an hour away by car. We have a very fine two-year college that anyone needing help transferring to a state college or a UC can get in our town.	5
P. Jensen	PN#1 PN#2	Destruction of this small area of “wetlands” will not prove as detrimental to Merced County such as the destroying of a rain forest or the damming of a river. Education on the other hand is vital and necessary to the well-being of Merced County.	5
P. Lo, Merced City School Board	SM	We govern the K-8 school district schools and we have approximately 11,500 students in Merced City. Of the 11,500 students, 40-plus percent are Hispanic American, 20 percent are Southeast Asian, 20 percent are Caucasian, and the rest are other groups. The majority of students are underserved students. The need for the university cannot be sufficiently underscored.	5
Recreation			
M. Giampaoli, Eastern Merced County Agricultural Coalition	NOI	Lake Yosemite has been a source of recreation for “all” people of Merced County for generations. The UC students would monopolize the lake and would shunt away the good people of Merced County as they have in other college towns.	5

**UC Merced EIS
Scoping Report: Public Comment Database**

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M. Butts	PN#1 PN#2	A large number [of people in Merced that Mr. Butts has talked to] related that one of the only places low income families can go to picnic, fish, and swim is Lake Yosemite. A few expressed it was a good place to take out of town friends or relatives. Many had used the facilities for family reunions, marriages, etc.	5
Socioeconomics			
B. Carpenter, UC Merced Committee	SM	<ul style="list-style-type: none"> It is thought that UC Merced could correct and improve to some extent the double-digit unemployment and very low per capita income in the area. Address the educational issues and the shortfall that we suffer in the Valley from an educational standpoint in the EIS. 	5 5
B. Duran, President of Merced Community College and President of the Hispanic Network. Member of Friends of UC Merced	SM	<p>C1: If in fact the project is delayed significantly, it is truly at risk. Delaying for indefinite periods of time may jeopardize the success of UC Merced in attracting good students and faculty.</p> <p>R1: The Corps will try to meet the schedule as much as possible. There is potential for lawsuits to slow things down.</p>	5
L. Macedo, President, Merced County Farmlands & Open Space Trust	PN#1 PN#2	The diversified farming in this area is economically vital to the many local, state and national packing sheds, processors, shippers, and fresh markets. The access to a reliable water source adds an additional value for the area's agriculture and results in being an essential watershed recharge area.	5
J. Gamboa, Executive Director, Greenlining Institute	PN#1 PN#2	The educational advancement of minority Valley students as a result of construction of the UC Merced Campus will make a large contribution to the economic and social development of the area.	5

**UC Merced EIS
Scoping Report: Public Comment Database**

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L. Lewis	PN#1	<ul style="list-style-type: none"> • Where is the money coming from for this project given budget shortfalls at other UC campuses? • Are there any public officials who own property in the area of the proposed site? 	4 ^b 4 (see footnote b)
T. Gilkerson, Green Line Institute	SM	<p>C1: We've built three prisons here in a very short amount of time. For what it costs to incarcerate a prisoner for one year, California could educate ten community college students, five California State University students, or three University of California students. The message being sent is that what's important is not education or valley students' futures, but the building of prisons.</p> <p>C2: The Virginia Smith Land Trust is very important, and we must not forget that it's important because it will provide scholarships to students to go to college. This is key in an area that has a 17 percent unemployment rate.</p>	5 5
L. Miller, San Joaquin Raptor Rescue Center	SM	C3: The Virginia Smith Trust as I know at this point does not benefit the valley-wide student. So if this project is indeed going to go ahead and help the minority and the underprivileged and anybody else in our Valley community, then the opportunity to receive these scholarships needs to be available Valley-wide.	5
J. Hiasa, Oakland, CA	SM	I believe that the potential here for raising millions of dollars towards scholarships for the students who will attend the UC Merced campus is an enormous up side that I don't think you're going to find very often, if at all. And pushing the campus to the south [off of the Virginia Smith Trust land] will eliminate that opportunity we have to literally help thousands and thousands of Valley students through the coming years.	5

^b Practicability of alternative sites will be evaluated by costs, logistics and existing technology. Other financial considerations are not in the scope of the EIS.

**UC Merced EIS
Scoping Report: Public Comment Database**

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S. Smith, Merced Union High School District	SM	<ul style="list-style-type: none"> There are 5 high schools on the east side of Merced County, serving approximately 9,000 students. We have seen an increase in student performance as a result of university-funded programs, and we see the university as a key factor in turning around the social conditions in the Central Valley. 	5
		<ul style="list-style-type: none"> Merced County has one of the highest child poverty rates in California. The County has more than 17 percent unemployment and in some parts of Merced County it's in excess of 20 percent. More than 20 percent of the parents in Ms. Smith's service area have less than a high school diploma. The University will bring access to economic growth as well as a research engine that will help close some of the gaps. 	5
B. Owens, Merced, CA	SM	We are all in favor of education, but \$164 million applied to the K-8 level of education would go a lot farther towards raising the educational scores and getting more worthy students into the universities that are already in existence than building this [campus] out here in the foothills and expecting to attract people into this valley where it's very cold in the winter, and very hot in the summer.	5
C. Chandler, UC Merced Foundation Board of Trustees Agriculture Committee	PN#1 PN#2	UC Merced is important to the Central Valley and will create significant educational, economic and environmental benefits for the region. We request that the analysis of impacts of the proposed project and alternatives give a full and balanced consideration to all environmental impacts, including impacts on productive agricultural land in addition to the socioeconomic impacts and benefits of this project.	5
Special Status Species			
M. Simovich, PhD, University of San Diego, Department of Biology	BA	Comments in the BA regarding the lack of impacts are unsupported. There is no way they can say "no function or value will be lost" without an Hydrogeomorphic Model. There is no way they can say a population	3

**UC Merced EIS
Scoping Report: Public Comment Database**

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D. Magney, Board Member, California Native Plant Society	PN#1 BA	will remain viable without a Population Viability Analysis. CNPS finds that the BA is inadequate in providing sufficient information on project-related impacts to wetlands and wetlands-related special-status species, including Succulent Owl's Clover (<i>Castilleja campestris</i> ssp. <i>succulenta</i>), Colussa Grass (<i>Neostaffia colusa</i>), and San Joaquin Valley Orcutt Grass (<i>Orcuttia inequalis</i>). A discussion of risks to rare plants is lacking from the BA.	5
C. Witham, Vernal Pools.Org	PN#1 PN#2	<ul style="list-style-type: none"> <li data-bbox="714 609 1680 901">• I am particularly disappointed that the Corps has chosen to request initiation of consultation under ESA Section 7 in violation of Sacramento District's published policy. Because the project's mitigation program will affect listed species but has no specific site identified, neither applicant can possibly comply with the requirements in the policy. The Corps' request to initiate consultation reflects improper favorable treatment of this applicant, which is prohibited by the 14th Amendment. <li data-bbox="714 901 1680 1161">• The information submitted with the application is not sufficient to support BOs by either US Fish and Wildlife Service or the National Marine Fisheries Service. The excessively vague mitigation program does not offer a basis to determine either the adverse impacts, or beneficial effects due to habitat preservation and management because the proposal is not site-specific and adequate biological surveys to assess impacts have not been carried out. <li data-bbox="714 1161 1680 1382">• The PNs are remiss in not describing the golf course violation (of 404 jurisdiction wetlands). I believe resolution of the golf course violation must occur concurrently with decisions on the subject applications, and must be based upon an integrated LEDPA finding and an integrated public interest review for the entire UC Merced project. 	5 5 5

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Scoping Report: Public Comment Database**

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C. High	PN#2	Can you tell me how to obtain a copy of the County's Habitat Mitigation Plan for the Infrastructure Impacts?	5
R. Carter, Atwater, CA	PN#1 PN#2	There are thousands and thousands of acres in California alone that are set aside for these so-called vernal pools and fairy shrimp. How many more need to be saved? I believe they could move some of these shrimp in their dormant period and they would continue to thrive without further harm.	1
B. Allayaud, State Director, Sierra Club California	PN#1 PN#2 BA	The indirect impacts to species that will result from the mitigation plan have not been addressed in the BA. The Sierra Club does not believe that the BA is adequate for the U.S. Fish and Wildlife Service to legitimately issue an opinion on whether or not the proposed project will cause jeopardy to any listed species.	5
E. Manzanilla, Director, Cross Media Division, US EPA	NOI	The EIS should include a comprehensive evaluation of impacts to species listed as threatened or endangered under the federal or state ESA. The document should include a list of all T&E species and critical habitat in the project area and region, which might be impacted by the construction and implementation of the proposed project. A copy of the applicants BA and the USFWS/NMFS BO (if complete) should be included in the DEIS with a discussion of the requirements for consultation with the USFWS and NMFS under Section 7 of the ESA.	5
L. Miller, San Joaquin Raptor Rescue Center; S. Burke, Protect Our Water	NOI	A change in the hydrology of the golf course lands which modifies or degrades the habitat of any listed species, on or off site is a take.	5
C. Witham, VernalPools.Org	NOI	I ask that the Corps base all descriptions of listed and sensitive species on surveys conducted in full compliance with published protocols as is required of all other applicants.	5

**UC Merced EIS
Scoping Report: Public Comment Database**

Author & Agency Tab & Document #	Source	Comment (summary)	Level of Effort
R. Notini, UC Merced, and R. Smith, County of Merced	BA	The applicants have indicated that they will consider modifying their projects to incorporate certain commitments believed by the Fish and Wildlife Service to be necessary to avoid jeopardy to species protected under ESA. Issuance of a B.O. is expected to occur on July 11, 2002 (135 days from Feb. 25, 2002).	5
P. Colmenick	SM	C1: How many billions of fairy shrimp do you have to have before the species comes off the endangered species list?	5
Traffic and Transportation			
M. Butts	PN#1 PN#2	Consider the secondary and cumulative effects that could be associated with UC Merced, such as the thoroughfare and all the disturbance and distress this roadway will create.	2
E. Manzanilla, Director, Cross Media Division, US EPA	NOI	<ul style="list-style-type: none"> The traffic analysis for the EIS should include projections of future travel demand on local and regional arterial roadways, and within the campus and campus community areas. EPA’s overall recommendation for this section is to make the methods and the assumptions in the traffic analysis transparent and easy to understand by the public and decision-makers. The EIS should discuss the relationship of the proposed north-south arterial, extending from Yosemite Avenue to Bellevue Avenue, and the Federal Highway Administration “Campus Parkway” project, which runs from the Highway 99 interchange north to Yosemite Avenue. The EIS should address whether the Campus Parkway to Yosemite Road and the Yosemite to Bellevue Avenue improvements are connected actions, as defined by CEQ regulations. The EIS should clearly describe FHWA’s role and whether they are a cooperating agency for the purposes of NEPA. The EIS should evaluate and discuss measures for reducing traffic 	5 1 5 1

**UC Merced EIS
Scoping Report: Public Comment Database**

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		impacts such as public transportation, and increased opportunities for alternative transit.	
J. Lesch, Director of Development Services, City of Merced	SM	C2: We support the existing location of the campus in the town center because of its orientation to Bellevue Road. The Bellevue corridor is important to the City of Merced because we plan that to be a major arterial and access point to the campus as well as the campus parkway. It will be a major transportation corridor including mass transit which would extend westerly - M Street and then M Street north/south transit corridor. I hope that the Bellevue corridor and the connectivity to the City of Merced will be a consideration in the EIS.	5
Visual Resources			
L. Lewis	PN#1	I am concerned about the aesthetics of this project. Leap frog development is something to be avoided. It would be better to develop in a small city like Merced than in existing open space.	5
B. Owens, Merced, CA	SM	If the UC were built on this site, it would totally change the character of this County.	5
Water Resources			
F. LaRiviere, Citizens Committee to Complete the Refuge	PN#1, PN#2	There is no situation in which the projects as proposed will result in anything less than significant adverse impacts to the aquatic environment.	5
F. LaRiviere, Citizens Committee to Complete the Refuge	PN#1 PN#2	<ul style="list-style-type: none"> • Has the Corps confirmed that fill will not be placed into any waters of the United States [as part of construction of Phase I of the Campus]? • The projects proposed in these PNs have the potential of adversely impacting well over 100 acres of waters of the U.S. 	1 5

**UC Merced EIS
Scoping Report: Public Comment Database**

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L. Macedo, President, Merced County Farmlands & Open Space Trust	PN#1 PN#2	Providing water for the anticipated additional 30,000 Community residents and the Campus will adversely impact area agricultural production. The Merced Water Supply Plan attempts to address the issue; but requires the expenditure of vast funds to build recharge basins and implement costly irrigation systems - primarily at the expense of the agricultural community.	1
L. Bocks, California Women for Agriculture	NOI	Our major concerns are the lack of definite water availability and the threat to the surrounding farmers if the UC should take control of the irrigation water in that area and use more than they originally estimate. This would cause major problems not only for the farmers in that area but also for the rural community that depends on their wells for water.	1
L. Miller, San Joaquin Raptor Rescue Center; S. Burke, Protect Our Water	PN#1 PN#2	<ul style="list-style-type: none"> • How will the groundwater recharge system proposed in the Merced County Water Supply Plan (Sept. 2001) affect the changes in landscape contours, groundwater flows and affected wetlands as a result of the PN projects? These must be addressed in the PN. • How will the proposed Haystack and Montgomery Reservoirs affect these projects and related wetlands? 	1 1
M. McCorry, McCorry Ranch, Planada, CA	PN#1	<ul style="list-style-type: none"> • My concerns relate to plans (or the lack of plans) to fulfill the water needs of agriculture and a growing San Joaquin Valley population - let alone to satisfy the needs of the prospective UC campus community. The Merced Irrigation District estimates that the UC will only require 1% of the water the district has to offer -- based on what data? • The fact that we frequently face multiple drought years in the valley and in the county of Merced makes the availability of water a critical issue. 	1 5

**UC Merced EIS
Scoping Report: Public Comment Database**

Author & Agency Tab & Document #	Source	Comment (summary)	Level of Effort
L. Lewis	PN#1	<ul style="list-style-type: none"> Why are you proposing this project for a potential floodplain? How much is the flood insurance going to cost the state? 	1
		<ul style="list-style-type: none"> Where is the runoff from the project going? 	2
R. Felch, President, Merced County Farm Bureau	PN#1	<ul style="list-style-type: none"> What is the consequence of urban development on water usage and quality? 	1
	PN#2	<ul style="list-style-type: none"> Further studies of the expected impacts to groundwater are needed to assure MCFB that the quantity and quality of water necessary for agricultural and residential purposes will be available. 	5
A. Strauss, Director, Water Division, US EPA	PN#1	The direct loss of 86 acres of waters of the U.S. for the construction of the campus, and 6.35 acres of waters for the construction of related roadways and utility lines, together with the indirect, secondary and cumulative impacts, will significantly degrade aquatic resources.	1
	PN#2		
E. Manzanilla, Director, Cross Media Division, US EPA	NOI	The EIS should provide a thorough analysis of proposed water demand for the campus and infrastructure project, and the effects of providing water for the project on surface and groundwater supplies and aquatic resources in the region. In addition, the EIS should address the indirect and cumulative impacts on water supply and quality from the development of the campus community and other induced community growth in the County. The EIS should include:	1
		<ul style="list-style-type: none"> Projected water supply for the campus and infrastructure, as well as potential needs associated with community growth. 	1
		<ul style="list-style-type: none"> Existing conditions of water resources in the region. 	1
		<ul style="list-style-type: none"> The City of Merced and MID's updated water resources plan. 	1
		<ul style="list-style-type: none"> Impacts of continued or increased surface water diversion on water quality and aquatic resources in the Merced and San Joaquin Rivers and tributaries. 	1
		<ul style="list-style-type: none"> Water conservation measures during construction and operation of 	1

**UC Merced EIS
Scoping Report: Public Comment Database**

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		the campus and infrastructure.	
L. Miller, San Joaquin Raptor Rescue Center; S. Burke, Protect Our Water	NOI	<ul style="list-style-type: none"> The dynamics of the subsurface water travel in the entire area and associated impacts are largely unknown and must be fully explored for informed decisions to be made in the EIS. 	3
		<ul style="list-style-type: none"> The two canals connected to the golf course are waters of the U.S. The linkage between the water from the canals and associated vernal pools, and other habitat areas must be addressed. The effects of lining the canals and potential effects on such habitat must be addressed. 	3
		<ul style="list-style-type: none"> Review must include the Haystack and Montgomery projects, and other potential water storage and flood control projects in the scoping area. 	3
		<ul style="list-style-type: none"> Review must consider effects of septic tanks in the project area, especially the increased activity due to growth pressure. 	5
		<ul style="list-style-type: none"> MID's proposed groundwater recharge basin and project to provide for future water demands must be included in the EIS. 	1
		<ul style="list-style-type: none"> If groundwater levels decline to the point where water supply provided to holders of riparian water rights, what mitigation will be necessary and how will it be carried out? 	1
		<ul style="list-style-type: none"> The issue of synthetic recharge to vernal pools has been raised at recent water meetings, as a result of potential changes to the hydrology and flows in the watershed. This must be included in the EIS. 	5
		<ul style="list-style-type: none"> Contamination of the groundwater due to historical discharge of industrial pollutants, including possibly those from Castle Air Force Base, must be considered. This issue has most notably surfaced in the Fahrens Park area. 	5

**UC Merced EIS
Scoping Report: Public Comment Database**

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Wetlands			
T. Burke, Protect Our Environment	SM	C1: Is it possible to begin construction on Phase I on the golf course while the 404 permit is being processed? R1: Yes, if there are no wetlands affected that are under Corps jurisdiction.	5
		C2: Is UC Merced required to submit a plan demonstrating they would not fill areas under Corps jurisdiction on the golf course for Phase I? R2: No, although one has been requested.	5
		C3: Can the \$30 million used to purchase easements be considered as minimization of impacts to wetlands? R3: Too early in the process to say definitively; however, it is likely that these easements would come under compensatory mitigation, not minimization of impact.	5
B. Owens	SM	C1: Are there wetlands on the golf course that were filled in the past that UC Merced would have to fix before they move forward with their project? R1: Minor violations have occurred on the golf course. The UC has indicated they would like to resolve the violation. The process of resolution is underway.	5
B. Duran, President of Merced Community College and President of the Hispanic Network. Member of Friends of UC Merced	SM	C2: Mr. Duran provides examples of other Corps applications for wetland fill that have been approved. What would the University of California need to do between now and then to ensure that the permits would be issued by 2004 and has the Corps made UC Merced aware of the elements that need to be dealt with?	5

**UC Merced EIS
Scoping Report: Public Comment Database**

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F. LaRiviere, Citizens Committee to Complete the Refuge	PN#1	<ul style="list-style-type: none"> The Corps has insufficient information to determine that the proposed compensatory mitigation has a likelihood of success, that it will replace lost wetland functions and values, or that it will help ensure no net loss of wetlands. 	3
	PN#2	<ul style="list-style-type: none"> On what scientific data is the assumption that “all wetlands lying within 250 feet of the proposed footprint of the Main Campus could potentially be indirectly impacted” based? Extent of indirect impacts on adjacent wetlands and waters should be based on the intensity of adjacent development, type of land use, topographic relation, disruptions of existing hydrologic patterns and connectivity rather than an arbitrary distance. 	3
		<ul style="list-style-type: none"> How will the impacts of fill activities that may occur in the Campus Natural Reserve be considered in the scope of the permit process? 	5
		<ul style="list-style-type: none"> Vernal pool creation is not an exact science. Attempts to create or restore vernal pool or seasonal wetland habitat in the Reserve could result in significant adverse direct and indirect impacts. 	5
		<ul style="list-style-type: none"> The information regarding mitigation and monitoring for wetlands is not sufficient to evaluate what is likely to happen on the ground. It is not possible for the Corps to reach a determination that the proposed impacts will be reduced to a level that is less than minimal, or that there will be no net loss of wetlands resulting from the projects proposed. 	5
		<ul style="list-style-type: none"> Since the applicants have acknowledged these projects are related and interdependent, the required wetland mitigation ratios should be the same for each applicant. 	5
		<ul style="list-style-type: none"> How will the 58 acres of Section 404 jurisdiction in the UC project area be addressed in this permit process? How will cumulative 	5

**UC Merced EIS
Scoping Report: Public Comment Database**

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		impacts of all the interdependent projects be factored into this permit decision?	
D. duVernet, Baywood Park, CA	PN#2	I am against any project, including this one, that wipes out some of the last vernal pools (only a small percentage of the original # of pools still exist.) Places like this are not only part of tourism, the biggest business in CA, but they are healing places.	5
M. Simovich, PhD, University of San Diego, Department of Biology	BA	Restoration and creation of vernal pools have not been shown in the primary literature to be successful in the long term. Papers by the USFWS say they are not acceptable mitigation.	5
K. Delfino, Defenders of Wildlife	PN#1 PN#2	The UC Merced application failed to include adequate information as to how impacts to wetlands and wetlands-dependent species will be mitigated.	1
D. Magney, Board Member, California Native Plant Society	PN#1 BA	The creation of viable vernal pools is next to impossible for a number of reasons. Most creation attempts have failed to recreate the vernal pool conditions impacted by the project. No wetland mitigation plan has been provided for review.	5
L. Miller, San Joaquin Raptor Rescue Center; S. Burke, Protect Our Water	PN#1 PN#2	<ul style="list-style-type: none"> • Indirect impacts of the infrastructure project are not assessed. • Effects on all wetlands by the proposed projects have not been addressed. Change in the contours of the landscape will affect drainage to areas not covered in these PNs, nor have impacts to wetlands with underground flow linkages been addressed, including those with connections to the canals. Canals are considered waters of the U.S. as a result of the Talent decision. 	2 1
E. Hoover, State of California, LLM	PN#1 PN#2	<ul style="list-style-type: none"> • The proposed fill will cause significant unmitigatable impacts to one of the largest remaining intact vernal pool complexes in the world. As such, neither proposed fill activity meets the requirements of 404(b) (1) and should not be authorized. 	5

**UC Merced EIS
Scoping Report: Public Comment Database**

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		<ul style="list-style-type: none"> • Educational opportunity to study wetlands does not replace the functions of the proposed wetland losses. 	5
		<ul style="list-style-type: none"> • The proposed projects are piece-mealing their fill activities and the fill activities of future related projects. Future fill activities in wetlands surrounding the proposed developments will be unstoppable and unenforceable. 	5
J. Gamboa, Executive Director, Greenlining Institute	PN#1 PN#2	Saving 70 more acres of wetlands (beyond the 50,000 acres of vernal pools and wetlands preserved in perpetuity already) by forcing the campus to move would only serve to send a message that saving 70 more acres of wetlands is more important than students who will contribute to the Valley's future economic, social and cultural growth and are the State of California's most precious environmental resource.	5
K. & R. Fullen, Elk Grove, CA	PN#1 PN#2	Other wetland functions and values are highly localized (for example, floodwater retention) so restoration of wetlands outside the immediate watershed does not mitigate for the loss of wetlands on the project site.	1
C. Witham, Vernal Pools.Org	PN#1 PN#2	<ul style="list-style-type: none"> • The overall project to be considered is the largest single vernal pool fill proposal in the history of wetland regulation in California. • The project is being proposed in an area of highly concentrated wetlands (as conceded in the application). • Creating over 100 acres of wetlands for 1:1 replacement is a sizeable construction project in its own right. If this construction were evenly spread over 8,000 acres of mitigation land near the campus, as the application suggests is possible, almost all of the several hundred acres of existing wetlands within the 8,000 acres would be exposed to construction within 250 feet and would be indirectly impacted according to the oversimplified standard used by the applicants. • The University proposes to compensate for wetland fill through any 	5 5 3 3

**UC Merced EIS
Scoping Report: Public Comment Database**

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		of four techniques: creation, restoration, enhancement, or additional preservation. The flexibility in technique that the University requests is not only unprecedented, but it makes a sound public interest review impossible. The University also proposed no standard of any kind for parcel size and contiguity, degree of current threat (essential to determine preservation value), or future management.	
B. Allayaud. State Director, Sierra Club California	PN#1 PN#2	An assessment of indirect impacts resulting from the required mitigation is not included in the 404 permit applications. Deferral of the mitigation is entirely inappropriate given the level of impacts of this project and the magnitude of the mitigation which will be required.	5
A. Strauss, Director, Water Division, US EPA	PN#1 PN#2	EPA’s primary concern with the projects, as proposed, results from the direct and indirect impacts to vernal pools and associated aquatic resources from siting a portion of the proposed UC Merced campus in a pristine, intact vernal pool complex.	5
E. Manzanilla, Director, Cross Media Division, US EPA	NOI	In preparing the EIS, we request that the Corps consider and discuss the issues raised by A. Strauss. In addition, in the EIS, the Corps should identify which alternative is the LEDPA under the CWA Section 404 alternatives analysis. While development on the Campus Land Reserve is not a part of the current permit application, it is reasonably foreseeable, and therefore associated impacts should be evaluated and disclosed as part of the cumulative and indirect impacts analysis in the DEIS.	5
Members of the Society for Conservation Biology, Chapter at UC Davis	PN#1 PN#2	We are concerned by the applicant’s failure to address mitigation measures in a concrete manner. The applicant defers commitment to mitigation measures until future time of project implementation. This does not allow a fair appraisal of the potential environmental damage to arise as a consequence of the project.	5

**UC Merced EIS
Scoping Report: Public Comment Database**

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W. Nastri, Regional Administrator, US EPA	PN#1	<ul style="list-style-type: none"> The conservation of the vast, intact vernal pool ecosystems in this region ranks as a top strategic priority of the Interagency Vernal Pool Stewardship Initiative. EPA believes the UC Merced site contains wetlands and waters that collectively constitute aquatic resources of national importance (ARNI) under the CWA. 	5
	PN#2	<ul style="list-style-type: none"> These waters/wetlands on the proposed UC Merced site provide hydrologic functions (surface and shallow subsurface water storage and exchange, energy dissipation, sediment retention, transport and deposition, and landscape hydrologic connections); biogeochemical functions (element and compound cycling, and organic carbon export); and habitat support functions (plant community support, and faunal habitat support). EPA believes that the projects as proposed will cause significant and unacceptable impacts to ARNI and will cause or contribute to significant degradation of waters of the U.S. based on direct, indirect and cumulative effects discussed in EPA’s comments. 	3
		<ul style="list-style-type: none"> The basic analytical problem with the applicants’ mitigation proposals is that they do not appear to recognize the need for mitigation to address the induced growth impacts of their projects. Direct and indirect impacts to the pristine aquatic resources will require a substantially higher compensation ratio than more degraded portions of the campus and associated community sites. In addition, the functional gain that can be predicted for creation and restoration efforts will require careful analysis prior to judging the adequacy of the compensatory mitigation proposals. Also, it is not clear whether the applicants’ proposals avoids a net loss of acreage of wetlands and other waters of the U.S. EPA anticipates that the NEPA process will address these issues. 	3

**UC Merced EIS
Scoping Report: Public Comment Database**

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A. Pentis, Biologist; M.A. Pentis, President, Vernal Pool Society	NOI	The proposal of creating artificial vernal pools as a viable mitigation avenue has already been shown not to be successful. The artificial pools will only last until the cyst/seed bank inoculum is consumed--about three to five years. If there is enough money in monitoring, the pools' biota can be kept somewhat alive by using a nursery care system until the money for wages is depleted--usually five years.	5
O. Aguilar, Green Line Institute	SM	C3: Do you look at the history of Merced or the County to see what has been damaging to the wetlands and vernal pools in the past? Was it prison construction? Are there ways to mitigate - other ways to protect the wetlands other than just focusing on this one small piece? R3: We look at cumulative impacts; that is, the collective impacts over the years. We'll be looking at what might happen in the future. We're looking at other sites in the county, and we agree, eastern Merced County is the place to have this university. So we're going to limit that search to Merced County. For the different sites, we're going to look at the impacts they're going to have and whether or no it's practicable in terms of costs, logistics and existing technology to build the campus at one of these sites.	5
P. Colmenick	SM	C2: When do the vernal pools come off the endangered list? We have millions of vernal pools in this state alone.	5
L. Boese, Merced CA	SM	The governor's earmarking of ample funds to protect the vernal pools along with the Packard Foundation's generous donation for the same purpose will protect our County and joint areas, an area almost the size of San Francisco, in perpetuity. We're going to have vernal pools saved because of this campus.	5

**UC Merced EIS
Scoping Report: Public Comment Database**

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Wildlife and Vegetation			
M. Simovich, PhD, University of San Diego, Department of Biology	BA	• There was no assessment of the minimal viable population done for any branchiopods.	3
		• The effects of invasion of non-native (non-endemic to the area) branchiopods were not considered.	3
		• Exotic plants are not the problem.	5
		• The effect of development on the use of pools by vectors of dispersal (birds, mammals, etc.) was not assessed.	3
M. Giampaoli, Eastern Merced County Agricultural Coalition	NOI	The Le Grand, Planada, Yosemite Lake topography is the flyway for many migratory birds. Canadian honkers, mallard ducks, doves and pheasants feed on their way south for the winter in the cultivated corn and grain fields. Homes and people will destroy the migrating process which has existed for a century or more.	2
R. and M. Furey, Planada, CA	NOI	The effect on habitat and wetlands would be moot or much less intrusive in another site. The area around the lake is home to many species and there is concern over what will happen when a UC and 32,000 people move in.	5
L. Lewis	PN#1	How do you plan to exclude invasive species from the vernal pool areas? How much will it cost?	1
B. Owens, Merced, CA	SM	A lot of the land qualifies as habitat. There are birds that use the trees and irrigation canals. They feed the whole food chain, everything from the minnows in the irrigation canals affects the wildlife in this valley. Agriculture has been part of this ecosystem for 150 years here and development has not.	5

**UC Merced EIS
Scoping Report: Public Comment Database**

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L. Miller, San Joaquin Raptor Rescue Center	SM	C2: A cumulative analysis needs to evaluate growth from introducing development. There are numerous bedroom communities that need to be taken into account.	5
C. Witham, VernalPools.Org	NOI	The scope of the EIS must include the direct, indirect, induced, secondary and cumulative impacts. Induced impacts are those likely to result from projects encouraged by the University project and include additional development as well as economic pressure on existing extensive agriculture in eastern Merced County and surrounding foothill areas.	5
Other Comments			
O. Aguilar, Green Line Institute	SM	C2: Do you keep in your analysis what impact it has every year that it takes you to make this decision and how that impacts the local community?	5
E. Manzanilla, Director, Cross Media Division, US EPA	NOI	In the EIS, describe how the project will meet the pollution prevention requirements including the purchase of EPA-designated recycled materials, such as EPA-designated transportation, construction and landscaping products.	5
F. LaRiviere, Citizens Committee to Complete the Refuge	PN#1 PN#2	<ul style="list-style-type: none"> • There are “connected actions” that must be considered in the EIS to avoid piece-mealing of impacts. • The applicant has indicated a desire to proceed with Phase I of the project prior to filing of a ROD. This is prohibited by the ESA and NEPA. 	5 5
S. Thompson, Fish and Wildlife Service, U.S. Department of the Interior	PN#1 PN#2	<p>We do not agree that the PNs are subject to the 1992 Memorandum of Agreement between the Department of the Interior and the Department of the Army because of the following reasons:</p> <ol style="list-style-type: none"> 1. Too early in the NEPA process (should be after the DEIS is available) 	5

**UC Merced EIS
Scoping Report: Public Comment Database**

Author & Agency Tab & Document #	Source	Comment (summary)	Level of Effort
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2. Lack of detailed analysis.			
Members of the Society for Conservation Biology, Chapter at UC Davis	PN#1 PN#2	The piecemealing of the Section 404 permit process into separate applications for the campus, road infrastructure, and community violate the intent of the Clean Water Act.	5
R. Hansen, Merced, CA	NOI	Army Corps should be working to facilitate the construction of the UC Campus. The proposed site would be immeasurably better with a UC Campus, as opposed to what it is now, or will be with some other project.	5
B. Allayaud, State Legislative Director, Sierra Club California	NOI	<ul style="list-style-type: none"> • The UC Merced Campus 404 Permit Application fails to meet NEPA regulatory requirements in that it proposes an “irreversible and irretrievable commitment of resources” by the construction of Phase I of the campus without the federal permits obviously needed to complete the proposed campus, campus community, and the federally funded campus parkway. • The requirement that a “nature reserve” be a fundamental part of the campus was an arbitrary decision that biases the campus location. 	5
C. Witham, VernalPools.Org	NOI	<ul style="list-style-type: none"> • The interrelated portions of the project must be addressed in the EIS as per CEQ regulations. The project as a whole includes the proposed UC campus, all necessary public infrastructure (not only PN#2, but also the Campus Parkway projects, and all other water supply, drainage, and utilities needed to serve the project), as well as the proposed new town campus community. • I request that the Corps establish a program for on-going public involvement and comment. In light of the potentially great environmental damage and level of controversy, I believe on-going status reports and opportunity to provide continuing comment as the EIS is prepared will be useful to all parties. 	5