

6.0 OTHER CEQA CONSIDERATIONS

6.1 INTRODUCTION

Sections 15126 and 15128 of the *State CEQA Guidelines* state that an EIR must include a discussion of the following topics:

- Significant environmental effects which cannot be avoided if the proposed project is implemented;
- Significant irreversible environmental changes which would be involved in the proposed project should it be implemented;
- Growth-inducing impacts of the proposed project; and
- A brief statement of the reasons why certain possible effects of a project were determined not to be significant and, therefore, are not evaluated in the EIR.

The following sections address each of these types of impacts and CEQA requirements, based on the analyses included in **Section 4.0, Environmental Setting, Impacts, and Mitigation Measures**.

6.2 SIGNIFICANT AND UNAVOIDABLE EFFECTS

This section identifies significant impacts associated with implementation of the proposed project that would not be mitigated to a less than significant level. As part of the certification process, The Regents will make a final decision as to the significance of impacts and the feasibility of mitigation measures in this Recirculated Draft SEIR (SEIR). As detailed in **Section 4.0**, implementation of the proposed 2020 LRDP would result in the following significant impacts that would not be mitigated to a less than significant level:

LRDP Impact AQ-2:

Campus development under the 2020 LRDP would result in operational emissions that would involve a cumulatively considerable net increase of criteria pollutants for which the air basin is in non-attainment.

Cumulative Impact C-AQ-1:

The construction and operation of the campus under the 2020 LRDP, in conjunction with other past, present, and reasonably foreseeable future development in the project area, could hinder air quality attainment and maintenance efforts for criteria pollutants.

Cumulative Impact C-HYD-2: Development of the campus under the 2020 LRDP, in conjunction with other past, present, and reasonably foreseeable future development in the project area, would not substantially interfere with groundwater recharge but would deplete groundwater supplies and contribute to the overdraft of the regional groundwater aquifer.

LRDP Impact TRANS-1: Implementation of the 2020 LRDP would significantly affect study area intersections during peak commute hours under 2030 plus project conditions.

Cumulative Impact C-TRANS-1: Implementation of the 2020 LRDP would significantly impact study area intersections during peak commute hours under 2035 plus project conditions.

6.3 ANALYSIS OF IRREVERSIBLE CHANGES

Section 15126.2(c) of the *State CEQA Guidelines* requires a discussion of any significant irreversible environmental changes that would be caused by the proposed project. Specifically, Section 15126.2(c) states:

Uses of nonrenewable resources during the initial and continued phases of the project may be irreversible, since a large commitment of such resources makes removal or nonuse thereafter unlikely. Primary impacts and, particularly, secondary impacts (such as highway improvement which provides access to a previously inaccessible area) generally commit future generations to similar uses. Also, irreversible damage can result from environmental accidents associated with the project. Irretrievable commitments of resources should be evaluated to assure that such current consumption is justified.

Generally, a project would result in significant irreversible environmental changes if:

- The project would generally commit future generations to similar uses at the project site.
- The proposed consumption of resources is not justified (e.g., the project involves the wasteful use of energy).
- The project would involve a large commitment of nonrenewable resources.
- The project would involve uses in which irreversible damage could result from any potential environmental accidents associated with the project.

Development under the proposed 2020 LRDP would result in the continued commitment of the UC Merced campus lands to institutional uses, thereby precluding any other uses for the lifespan of the campus. The University of California's ownership of the campus represents a long-term commitment of the campus lands to an institutional use. Restoration of the campus to pre-developed conditions would not be feasible given the degree of disturbance, the urbanization of the area, and the level of capital investment.

Additional irreversible commitments to future uses include those related to new development on the lands designated Campus Mixed Use (CMU). Development of these lands would constitute an irreversible use of these lands because once buildings or pavement are constructed, the underlying soils would no longer be available for other uses. Campus growth under the 2020 LRDP would result in the loss of approximately 100 acres of undeveloped although disturbed land, which provides some habitat value and has historically been used for grazing. As discussed in **Section 4.2, Biological Resources**, UC Merced would implement mitigation measures to reduce impacts to sensitive biological resources, and UC Merced has already preserved and enhanced appropriate habitat elsewhere in the vicinity of the campus. Several thousand acres of land owned or conserved by the University are and will continue to be available for grazing.

Resources that will be permanently and continually consumed by project implementation include water, electricity, natural gas, and fossil fuels. However, the consumption of these resources would not represent unnecessary, inefficient, or wasteful use of resources. The growth in enrollment is responsive to growth that has already occurred in the state as the children mature to college age. Therefore, natural resources are currently being consumed by this demographic group and would continue to be consumed by this group at some location. Nonetheless, construction activities related to the proposed 2020 LRDP would result in the irretrievable commitment of nonrenewable energy resources, primarily in the form of fossil fuels (including fuel oil, natural gas, and gasoline) for automobiles and construction equipment.

UC Merced has instituted several water conservation measures. These include a water conservation program to reduce the use of irrigation water by using drought tolerant species in landscaping, installing drip irrigation where appropriate, using automatic timing systems to apply irrigation water during the part of the day when evaporation rates are low, and installing of water meters. UC Merced has been installing low-flow fixtures in new buildings to minimize water consumption.

UC Merced has also instituted lighting and other energy conservation measures including up-to-date energy-saving equipment. Lighting conservation efforts in new construction include installation of occupancy sensors to automatically turn off lights when not in use, lighting reflectors, electronic ballasts, and energy-efficient lamps. In addition, UC Merced will continue to construct new facilities under the

2020 LRDP in accordance with the UC Green Building Policy, which requires campuses to outperform the energy requirements of the California Building Code by at least 20 percent on all new construction and major renovation projects (except acute care facilities) or meet UC's Whole Building Energy Targets.

With respect to operational activities on the campus, compliance with all applicable building codes and standard campus conservation features would ensure that all natural resources, including water, are conserved to the maximum extent feasible. It is also possible that new technologies or systems will emerge, or will become more cost-effective or user-friendly, to further reduce the campus's reliance upon nonrenewable energy resources. Overall, the consumption of natural resources would increase at a lesser rate than the projected population increase due to the variety of energy and water conservation measures that UC Merced has implemented and will continue to implement.

The *State CEQA Guidelines* also require a discussion of the potential for irreversible environmental damage caused by an accident associated with the project. While UC Merced uses, transports, stores, and disposes of hazardous wastes, as described in Section 4.7, Hazards and Hazardous Materials of the 2009 LRDP EIS/EIR, UC Merced complies with all applicable state and federal laws and existing campus programs, practices, and procedures related to hazardous materials, which reduces the likelihood and severity of accidents that could result in irreversible environmental damage. In fact, over the campus's nearly 15-year history, there has never been an accident that resulted in irreversible environmental damage, indicating that current practices with respect to hazardous materials handling are adequate, and thus the potential for campus development under the 2020 LRDP to cause irreversible environmental damage from an accident or upset of hazardous materials, is less than significant.

6.4 GROWTH-INDUCING IMPACTS

This section evaluates the potential for campus development under the 2020 LRDP to induce growth in eastern Merced County. Section 15126.2(d) of the *State CEQA Guidelines* requires that an EIR include a discussion of the potential for a proposed project to foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment.

The *State CEQA Guidelines* do not provide specific criteria for evaluating growth inducement and state that it must not be assumed that growth in an area is necessarily beneficial, detrimental, or of little significance to the environment. Growth inducement is generally not quantified, but is instead evaluated as either occurring, or not occurring, with implementation of a project. The identification of growth-inducing impacts is generally informational, and mitigation of growth inducement is not required by CEQA. It must be emphasized that the *State CEQA Guidelines* require an EIR to "discuss the ways" that a project could be growth inducing and to, "discuss the characteristics of some projects that may

encourage...activities that could significantly affect the environment.” However, the *State CEQA Guidelines* do not require an EIR to predict or speculate specifically where such growth would occur, in what form it would occur, or when it would occur.

For the purposes of this analysis, the proposed project would be considered growth inducing if it meets either of the following criteria:

- The proposed project causes economic expansion and population growth through employment expansion and/or the construction of new housing, or
- The proposed project removes an obstacle to population growth (for example, through the expansion of public services or utilities into an area that does not presently receive these services), or through the provision of new access to an area, or a change in a restrictive zoning or General Plan land use designation.

An evaluation of the proposed project compared against these criteria is provided below. In addition, because local land use plans provide for land use development patterns and growth policies allow for the orderly expansion of development supported by adequate public services, (e.g., water supply, roadway infrastructure, sewer service and solid waste service), growth induced by the proposed project would be considered adverse only if the growth is not consistent with the land use plans and growth management plans and policies for the area affected.

6.4.1 Growth Induced by Employment Expansion and Provision of Housing

Campus-Related Direct Growth

The growth and development of a large institution such as a major research university could result in a substantial growth in a region’s population and employment. The UC Merced campus would continue to draw students, faculty, and employees from both the surrounding region and other parts of the state and country. In addition to the direct population changes that would result from any nonlocal students, faculty, and staff and their dependents relocating to Merced County, additional increases in employment and population could result as campus-serving businesses or other population-serving businesses move or expand in the area in response to increased demand.

The 2009 LRDP EIS/EIR analyzed the potential for campus development under the 2009 LRDP to result in substantial population growth in the City of Merced and Merced County. The analysis in the 2009 LRDP EIS/EIR was based on the assumption that campus enrollment would increase to 25,000 students by 2030 and that the campus would have an employee population of 6,560 faculty and staff for a total of 31,560 persons. The EIS/EIR estimated students and employees who would be already living in the area and hence would not represent new population and the number of persons who would be new to the area.

The EIS/EIR also estimated the number of dependents that would accompany the students and employees that would relocate into the City of Merced and the County. The EIS/EIR projected that between 2009 and 2030, a population of approximately 38,044 persons associated with the campus would be added to the area.

As explained in **Section 1.0, Introduction**, the University has revised its enrollment projections through 2030 down substantially. Enrollment at UC Merced is expected to grow at a slower pace than originally anticipated, adding no more than about 5,300 additional students between 2020 and 2030. The campus is now projected to reach an enrollment of 15,000 students at full development under the 2020 LRDP and is expected to have a total population of 17,411 including students, staff, faculty, and researchers, which is substantially less than 31,560 persons previously projected for 2030. The University has not projected enrollment growth beyond 2030 as it will be largely dependent on future student demand and funding for additional facilities.

In order to estimate how many new persons would relocate to the Merced area, this SEIR conservatively assumes that all of the new students that would enroll between 2020 and 2030 would be non-local and would move into the area in order to study at UC Merced. This SEIR also assumes that all of the new faculty and 50 percent of the new staff would relocate to the Merced area at the time that they are hired by the University (see **Section 4.6, Population and Housing**, for demographic data and assumptions used in this SEIR). Some of the non-local students, faculty, and staff would also be accompanied by dependents. Therefore, by providing opportunities for education and employment, the 2020 LRDP would directly increase the population of Merced County and adjacent Stanislaus and Madera Counties by about 6,431 persons.

To address this direct growth, the 2020 LRDP includes land area to house half of the campus's student population at full development. As discussed in **Section 4.6, Population and Housing**, with half the students housed on the campus, the remainder of the new students and all of the new nonlocal faculty and staff would require a total of about 2,000 dwelling units. A comparison of this housing demand to available existing and projected housing supply in the City of Merced, other Merced County cities, and in the cities in the adjoining counties shows that ample housing would be available.

In summary, some of the direct growth impacts of the campus would be captured within the campus whereas some of the direct growth impacts would occur in the City of Merced and other communities near the campus where the new population would reside. The environmental consequences of this direct growth are evaluated in relevant technical sections of this SEIR, including the effects of this growth on traffic, air quality, noise, housing supply, and water supply, as well as in the analysis of cumulative

impacts. To the extent that there would be significant impacts from this direct growth, those would be mitigated by the mitigation measures included in this SEIR.

Campus-Related Indirect and Induced Growth

The development of the campus would not only result in the direct growth in the population of Merced and adjoining counties as described above but would be expected to generate additional indirect and induced growth (hereinafter induced growth) within the regional economy through the workings of the income multiplier and the magnet effect of a major research university. The nature and magnitude of this induced growth is first discussed below, followed by a discussion of its environmental consequences.

In 2000, when the new campus was first proposed in Merced County, a study of the multiplier effect of the new campus was commissioned by Merced County. That study conducted by EPS analyzed the projected expenditures of campus students and employees and the expenditures made by UC Merced within the regional economy and estimated the number of the induced jobs that would be supported by this spending (EPS 2000). The study concluded that at an enrollment level of 25,000 students and with 6,560 faculty and staff, the direct jobs at the campus and the spending by the students and UC Merced would generate approximately 6,000 additional jobs in the regional economy. However, as noted above, the projected size of the campus in 2030 is reduced from an enrollment level of 25,000 FTE students to 15,000 students, and instead of 6,560 faculty and staff in 2030, UC Merced is expected to have 2,411 employees on the campus and another 300 employees in facilities off campus for a total of 2,711 employees. Using the same ratio of induced jobs to enrollment that is in the 2000 study, with this reduced enrollment, UC Merced would result in approximately 3,600 induced jobs in Merced and adjoining counties.

The induced jobs are not expected to result in substantial additional growth impacts of their own. A large influx of non-local population into Merced and adjoining counties in response to these induced jobs is not expected for several reasons. A large number of these indirect and induced jobs would be in the retail and services sectors and would not require special skills. Therefore, it would be reasonable to assume that the majority of these jobs would be filled by persons already residing in the area that either are unemployed, underemployed, or would like to work locally instead of commuting to other communities, or by students at the campus, or dependents and spouses of the faculty and staff who move into the area in response to the new direct jobs at UC Merced. Based on the State of California Employment Developmental Department, the average annual unemployment rate in the county has also historically been high and has ranged between 9.3 percent and 14.5 percent in the last 5 years (2018). Therefore, a pool of local labor should also be available to fill these induced jobs.

It is acknowledged that some potential remains for induced growth to occur, particularly in geographic areas that are proximate to the campus. The pressure to develop would be the greatest along the Bellevue corridor and the lands to the south of the campus because of their proximity to the campus. Lands to the north and east of the campus would not be developed because they are conservation lands. Lands to the south of Yosemite Avenue would be too distant to experience the same growth pressure as lands along Bellevue corridor. Besides those lands are prime farmlands and conversion of that land to urban uses would not be allowed under the County policies that control the conversion of prime farmlands.

Recognizing the potential growth pressures on land along Bellevue Road leading to the campus, in developing the Merced 2030 Vision General Plan, the City redefined its SUDP boundary and sphere of influence (SOI) to encompass the lands on either side of Bellevue Road between G Street and Lake Road. By commencing the planning for the development of this area, the City is reducing the potential for haphazard and unplanned growth that may otherwise occur.

The environmental effects from the development of housing, retail and urban services in the areas of the City of Merced that are slated for development are evaluated in the General Plan EIR and include the conversion of farmland to urban uses; impacts on archaeological and historical properties; impacts on biological resources, including wetlands, air quality, noise, water supply, and traffic. Environmental impacts from the expansion of the City's Sphere of Influence (SOI) (including the Bellevue corridor) are also evaluated in the General Plan EIR and include conversion of farmland to urban uses, biological resource and cultural resources impacts, traffic, air quality, and water supply impacts. Additional environmental review would be conducted when specific projects are proposed. Development projects constructed within the City would be required to mitigate their significant environmental impacts in accordance with adopted General Plan policies.

6.4.2 Removal of an Impediment to Growth

In addition to population growth from the provision of housing or employment, population growth in an area may also result from the removal of physical impediments, which can include non-existent or inadequate access to an area; the lack of essential public services and utilities (e.g., water supply); or restrictions on growth and planning impediments such as restrictive zoning and/or general plan designations.

As analyzed in **Section 4.10, Utilities and Service Systems**, all of the existing utilities are adequate to serve the campus through 2030, and no expansions beyond those that are already planned would be required. Therefore, there would be no potential for provision of utilities to the campus to trigger growth beyond what is planned for the campus. Regarding the roads that provide access to the campus, those

roadways would be improved and/or widened to serve the campus and would have the potential to improve access to undeveloped land along Lake and Bellevue Roads. However, those roadways would not be improved by the University but by the County as and when the County determines additional roadway capacity improvements are needed. For these reasons, the proposed project would not induce growth through the extension of infrastructure.

As noted above, growth can also be induced if restrictions to growth and other planning impediments are removed. The proposed project would not require any changes to land use designations or zoning as it would be implemented on land owned by the University. The project would also not cause any existing restrictions on growth on lands within the City's SUDP/SOI or within the unincorporated county to be removed.

6.4.3 Conclusion

Implementation of the proposed project would induce growth within Merced County. However, the growth would be substantially less than previously projected for 2030. Although there would be growth pressures on lands adjacent to the campus, especially along the Bellevue corridor and to the south of the campus. However, the City has redefined its SUDP/SOI to encompass the Bellevue corridor in order to guide the development of this area. Therefore, the induced growth due to the campus would be adequately addressed by the land use planning that is underway. This land use planning would help reduce the environmental effects associated with the induced growth.

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