

From: [Jerry Perezchica](#)
To: [Brown, Leah](#); Tiffany.Ho@countyofmerced.com
Subject: Comment: Appendix G: City of Merced Housing Element (Combined)
Date: Wednesday, June 12, 2024 4:34:20 PM

In recognition of the absence of a General Plan Advisory Committee, which is typically composed of community members who would contribute to relevant community land use and zoning policy needs analysis, a small percentage of residents are stepping up to fill this void by participating in the comment period. If the past active engagement data for this process is an indicator of the statistical significance of public comment this round, that in itself will be a test of the efficacy of this compliance exercise.

Within our family, our findings conclude that this draft is made up of inconclusive data and find the following items to be red flags. Due to the complexity of this document, and the unique social drivers of each jurisdiction, these comments focus on the City of Merced. Given this is a multi-jurisdictional needs analysis, the document fails to set direction for how the jurisdictions will optimize housing as one ecosystem.

1. This Housing Element lacks vision and key performance indicators; without vision there is no way to verify achievements
2. Case in point: the persistent lack of very low and low income housing development
3. As documented, only 5% of the RHNA Cycle 5 lower income units were actually constructed and yet none of the programs proposed in the Cycle 6 draft acknowledge or address what prevented meeting the objectives; what has been learned and what is the corrective action to enable a meeting a more demanding Cycle 6 requirement - *what state legislation is being used to course correct*
4. There is no vision or key performance indicators to align middle housing with transit and retail centers
5. There is no vision for a Downtown up-zoning methodology to enable developers to build housing around the Intermodal Commuter Station Area (High Speed Rail) in Downtown Merced; there is no criteria for dwelling/acre or parking plans
6. It is clear the City is relying on the vacant property inventory to influence in-fill development with no traffic impact analysis; this draft fails to architect an effective Countywide Transit Oriented Development land use plan leveraging SB6 Pathways for Residential Development on Commercially Zoned Land; SB10 Zone for smaller, less expensive housing and SB35 a statute streamlining housing construction
7. This document fails to recognize Broadband accessibility as infrastructure
8. This draft is more platitude than a set of Programs with key performance indicators; billed as a Multi-jurisdictional Housing Element, it fails to set a comprehensive plan for the County to function as one collaboration to achieve housing goals; it needs to focus on optimizing housing around transit to enable all economic levels to easily access services statewide
9. There needs to be transparent empirical key performance indicator data for each Program that is easy to find, easy to understand and easy to explain; i.e., how many above average median income new construction homes are owner occupied

This draft needs to clearly define a set of Programs with defensible definitions, methodology and timeline in compliance with AB686

1. Provide the data analysis used to support claims such as the use of websites as a critical community resource
2. Provide the defense for denial of any possible environmental constraints such as flooding and/or drought
3. Identify methodology, including staff resources, to demonstrate progress on all housing goals including specific timelines
4. Ensure staff job titles and job descriptions align with job titles used in the Housing Element documentation; where are these jobs on the organization chart
5. Articulate key performance indicators that measure achievement towards meeting housing needs for vulnerable groups such as seniors and the unhoused; require City Council to provide an annual February update on what they are doing in their Districts to provide resources to the under-served
6. Provide a website link that provides an overview of the Housing Element within two clicks; Ten minute YouTube videos detailing how the County and City are in compliance

The perception is that the consultants checked the boxes without understanding the cultural drivers for this community and that City Staff does not have a pulse on the actual community needs either.

Respectfully,

The Perezchica Family

Advocates for Sustainability

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