

June 12th, 2024

Leah Brown, Management Analyst
City of Merced Development Services
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Dear Ms. Brown,

We are a coalition of Merced County residents who seek to nurture healthy, resilient, and diverse communities in our County with reliable, service- and transit-oriented housing that is financially accessible for all.

We are writing in response to the proposed City of Merced Multijurisdictional Housing Element for the 2024-2032 cycle.

Upon discussion and review, we have found the following items to be priority concerns that the Housing Element does not adequately address. Due to time constraints, our letter focuses on the City of Merced, but similar issues and concerns also apply to the County and its other jurisdictions.

1. The absence of enforceable means to achieve the goals of the housing element. The majority of the programs proposed lack deadlines and any means of ensuring that the actions proposed will be executed.
2. The continued lack of construction of lower income housing. Only 5% of the lower income units in the cycle 5 site inventory were actually constructed and yet the cycle 6 draft does not acknowledge the severity of the problem to prevent a repeat.
3. The overemphasis on housing development in District 6 promoting urban sprawl and the absence of plans for in-fill and transit oriented development in lower resourced Districts 1,2,3, and 5. Most glaring is the lack of development proposed in District 3 despite the plans for the CA High Speed Rail Station.
4. While districts 1,2,3, and 5 are identified as lower resource districts, there are no policies or programs proposed to create opportunity and increase access to resources in these disinvested districts.
5. The over-reliance on city and agency websites as a key resource for information and community engagement, when they have historically contained limited and outdated information.
6. Merced's housing element shares a similar problem to most of the housing elements in the county. Analysis of issues and constraints are limited by simplified comparisons to neighboring cities and counties in the region. Conclusions are drawn based on whether data is similar to neighboring jurisdictions. When data is similar, further analysis is not conducted and it is concluded that there is no problem.

In response we demand our city leaders and planners:

1. Clearly identify programs that will ensure or proactively incentivize the construction of lower income units on sites identified in the inventory for lower income housing. For example, inclusionary housing policies or increased minimums per acre on R4 zoned sites.
2. Reassess the site inventory to promote transit oriented, in-fill development, particularly downtown, to more evenly distribute resources and further fair housing.
3. Identify the data used to support claims in the Housing Element, such as the denial of any possible environmental constraints including flooding and/or drought
4. Identify measurable indicators to be able to demonstrate and track progress on all housing goals and programs. This includes ensuring the availability of lower income units in the proposed site inventory. The draft already includes 102 lower income units on an Olive Avenue site that is no longer available for housing. Data must be tracked.
5. Indicate the resources and staff needed to complete each proposed program to ensure capacity will realistically be available and programs achievable.
6. Address future housing needs for vulnerable groups such as seniors and the unhoused, in addition to providing additional affordable housing to the under-served City of Merced Council districts 1,2,3 and 5.
7. Propose a clear plan for community engagement with a required minimum level of participation for activities. The participation numbers should be tracked and when they fall short of the minimum, the engagement strategy should be reassessed and revised.
8. Introduce an advisory committee which supports updates and monitoring of the General Plan.

As a coalition, we have a stated mission to engage in education and advocacy to ensure that Merced County has connected communities with affordable housing. We do this by promoting high density and mixed-use zoning, infill housing, diverse housing stock that is climate resilient and has safe and sustainable transportation options.

In addressing our housing needs, we further encourage all leadership to embrace a vision for the future of our communities in line with this mission.

Signed,

Maria-Elena Young, Merced City
Layne Presley, Merced City
Peggy Hsu, Merced City
Gloria Meneses-Sandoval, Merced City
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