



June 29, 2015

*Delivered via email to [Matt.fell@mcagov.org](mailto:Matt.fell@mcagov.org)*

Matt Fell, Transportation Manager  
Merced County Association of Governments  
369 West 18<sup>th</sup> Street  
Merced, CA 95340

RE: Comments on MCAG's APS

Dear Matt Fell:

Development of an Alternative Planning Strategy, while a result of MCAG's failure to achieve an acceptable Sustainable Communities Strategy, offers a valuable opportunity to think aggressively and creatively to plan for a fair and sustainable Merced County.

SB 375 mandates metropolitan planning organizations ("MPOs") in California to achieve certain greenhouse gas reduction targets. Because the Merced County Association of Governments ("MCAG") sustainable communities strategy ("SCS") did not do so, it must create an alternative planning strategy ("APS") that will show how the greenhouse gas reduction targets will be met through alternative tactics. As the bill states, these tactics may include items such as development patterns, infrastructure, and/or transportation. The APS must explain why these alternative strategies will be effective to meet the targets while those strategies developed by the SCS previously were not efficacious.<sup>1</sup>

### **MCAG APS Development**

MCAG created an APS Steering Committee made up of persons representing thirteen organizations with interests pertaining to Merced County and its residents. MCAG staff developed a survey for persons residing in Merced County to assess lifestyle changes people are willing to make in order to reduce greenhouse gas emissions. This survey was reviewed by the APS Steering Committee and suggestions were given.

We submit the following comments based in part on the survey, based in part on responses we received in conducting the survey, and based on our experience in Merced and in other counties in the San Joaquin Valley.

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<sup>1</sup> Senate Bill No. 375, Chapter 728. Pg. 2.



## **Direct New Growth to Existing Communities**

MCAG's APS must direct growth through infill strategies that promote increased investment in existing communities – including disadvantaged neighborhoods and communities - that provide a range of housing choices (affordable small, medium, large lot single family and multifamily housing) for existing and new residents.

MCAG's APS must direct housing and employment growth to existing cities and unincorporated communities rather than directing growth to new town development. For far too long, lack of investment in and growth away from existing communities has led to concentrated poverty, inequities in health outcomes, poor air quality, loss of farmland, and limited affordable housing opportunities. Allowing development and transportation resources to flow to new development areas will inevitably exacerbate severe inequities found in Merced's most disadvantaged areas. Additionally new town and sprawl development has a direct and irrevocable impact on GHG emissions by increasing reliance on vehicles, increasing travel times, and decreasing opportunities for infill and mixed use development. Growth in existing disadvantaged cities and unincorporated areas will further MCAG's GHG reduction goals, will reverse decades of lack of investment in Merced's own communities, and will allow MCAG to work with its member jurisdictions, community partners, and state agencies to leverage additional investment to improve access to jobs, housing, and basic services. This will also ensure protection and conservation of farmland, which will conserve our agriculture based economy.

To further these efforts MCAG should conduct a needs and opportunities assessment that catalogues health indicators, infrastructure deficiencies, housing needs, water and wastewater capacity, employment opportunities, and access to basic services throughout its jurisdiction. The assessment should also assess opportunities for infill development in existing communities. A completed assessment will guide MCAG and its member jurisdictions in prioritizing and incentivizing investment from both local and outside sources for housing, transportation, and basic services.

Directing growth to infill opportunities in existing cities and communities will also facilitate investment of basic services such as grocery stores, employment opportunities, community clinics, parks, etc., that will in turn require investment in capital infrastructure to allow residents to walk or bike safely to their desired destinations. Eligibility and scoring criteria must also provide preference for projects that address historic infrastructure deficiencies in low income communities of color. MCAG's needs assessment will identify neighborhoods and communities that are in need of infrastructure investment to promote walking and biking. Those neighborhoods must be prioritized for funding. This will require some communities to receive more than their proportional fair share of funding to address historic inequities in levels of investment.

## **Connect Land Use Development to Sustainable and Equitable Water Management**

California's historic drought and its impact to water quality and quantity force our region to rethink historic patterns of development. We must work together to ensure that water quality and quantity needs



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in existing cities and communities – specifically in disadvantaged communities - are addressed before any new well permits or extension of services to serve new town development are approved. The needs assessment mentioned above will help identify water deficiencies throughout Merced County and should identify communities at risk of water shortages. We therefore suggest that in its land use development pattern in the APS, MCAG only direct housing and employment growth to existing communities and work with member jurisdictions to address water quality and quantity deficiencies to support infill investment.

### **Direct Transportation Investments to Existing Cities and Communities**

To effectively reduce GHG emissions, MCAG's APS must direct transportation related investments to existing cities and communities – particularly in low income communities and communities of color that exhibit the impacts of insufficient investment. A range of transportation options coupled with increased and appropriate housing and employment growth in existing communities will lead to improved health and air quality outcomes as well as decreased reliance on personal vehicle use and decreased GHG emissions.

MCAG should also establish a policy that directs all discretionary transportation dollars to existing communities and prohibits the use of funds for new road expansion and/or to facilitate new growth.

### **Prioritize Investment in Public Transit and Active Travel over New Road Expansion**

MCAG must prioritize funding for improved public transit options and active travel project over new road expansion. To do this, MCAG should revise its eligibility and scoring criteria to prioritize funding for projects that seek to establish new bus routes, expand frequency of existing bus routes, develop and expand vanpool programs, and establish new bus stops with necessary amenities to protect from inclement weather. MCAG should also prioritize investment in active travel. In order to effectively reduce GHG emissions, the region must work to provide a range of alternate modes of transit to allow residents to get to where they need to go. Investments should include investments in necessary infrastructure (sidewalks, streetlights, curb and gutter, bike lanes, and other pedestrian safety measures) to promote increased walking and biking. MCAG should also establish a complete streets policy that requires its member jurisdictions to incorporate sidewalks, streetlights, curb and gutter in all projects.

Additionally, our experience indicates that express transit would increase ridership. We would like to encourage express routes between cities within Merced County, as well as to other destinations in California. Increasing passenger rail commutes by 300 passengers a day is proposed to reduce greenhouse gas emissions by 0.7%. We recommend that in order to increase such ridership, fees for train transit are reduced so that persons in low-income communities and communities of color will have increased access and can contribute to these anticipated GHG reductions.



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Finally, MCAG must frontload all public transit and active travel investments in its current RTP and all future RTPs. Doing so will result in early and ongoing emission reductions and provide multiple social, economic, and environmental benefits to low-income communities of color.

### Related Survey Questions

In administering MCAG's APS survey we have found that residents of existing neighborhoods – particularly low income neighborhoods – have indicated that they would in fact transition from personal vehicle use to public transit should service be provided, frequency of existing service was extended, transit service met their needs, and/or if infrastructure was in place to safely get to where they need to go via walking and biking. We therefore suggest that MCAG modify its financially constrained project list to increase transit investments to establish new service lines and extend frequency of existing services to low income neighborhoods and communities.

Furthermore, MCAG should establish a reduced fare structure program and policies to provide free bus passes to low income residents in the Merced region. Survey respondents have also indicated that they would increase bus ridership if affordable and/or free bus passes were in place.

An "aggressive" bicycle program proposed by MCAG is thought to reduce greenhouse gas emissions by 0.7%. While we support active modes of transportation, many persons residing in low-income communities and communities of color lack access to bicycles. Many persons who took the survey, even those with access to bicycles, stated that they would not use a bicycle for transportation without isolated bike lanes for safety.

Our experience administering the survey found that "Aggressive" pedestrian strategies would reduce greenhouse gas emissions more than an aggressive bicycle strategy especially in several more rural communities. Access to safe walkways increase pedestrian activity, reduce greenhouse gas emissions and improve public health. We would like to point out that this includes more than safe sidewalks; it includes safe crosswalks at street and railroad crossings.

### Invest in Developing Rural Transit Options

We support MCAG's efforts to expand and encourage use of van pool programs as one option for low income rural communities. Vanpools provide effective options for low income residents to get to where they need to go such as employment and educational opportunities, grocery stores, medical care and/or other basic necessities. We further recommend MCAG provide funding for research development that



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quantifies GHG reductions from creative transit options for rural communities such as raitero programs similar to what Fresno County is piloting.<sup>2</sup>

### Increased Density

Increasing infill by 1/3 and making town centers denser would reduce greenhouse gas emissions because of the ease with which people could take active modes of transportation to basic services. Additionally, increased density and smaller lot sizes protect natural resources, open space, and agricultural lands by using less land and water.

### Related Survey Questions

We agree that smaller lot sizes and increased density can reduce GHG emissions through various means, however results from the survey tool may not demonstrate community support for increased density / smaller lot size development because survey takers themselves are not in a position to relocate. For example, many residents do not have the means to relocate to higher rent areas, some residents rely on larger lots for backyard gardens, and many residents are tied to their homes and communities. Also, in administering the survey there was much confusion with respect to housing choice questions that may impact survey results. For example, many persons did not understand the difference in the question where they would like to live now versus in the future. For Merced County residents, the pictures did not accurately represent any housing with which they were familiar. Accordingly, survey results may not accurately reflect general support for greater density in both the infill and new growth context.

### Increased Cost Measures to Incentivize Shifts Away from Personal Vehicles and Fossil Fuels Will Disproportionately Impact Lower Income Residents, Especially Those in Rural Communities

MCAG proposes “aggressive” parking restrictions and pricing to reduce greenhouse gas emissions by 1.1%. However, historic disinvestment in low income rural communities has contributed to a lack of basic services, goods and amenities for residents in these communities along with inadequate transit service. This dual effect of under-investment in rural communities means that residents are reliant on personal vehicles to access basic services. Parking restrictions and parking meters will result in disproportionate impacts to low income individuals and families from disadvantaged areas with no alternative to personal vehicle use.

Similarly, MCAG suggests encouraging alternative fuel subsidies and fees on gas-powered cars. Most residents – especially lower income residents - are not in a position to purchase alternative energy

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<sup>2</sup> Raiteros are an informal transportation system where a person in the community, such as a retired farmworker, provides transportation to people who need to get to the hospital, court, other appointments, and the like for a cheap rate.



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vehicles. Additionally, additional fees will present a hardship for lower income residents barely able to access necessities, such as health care and food, and access work and school.

### **Ensure a Transparent and Accountable Public Process**

MCAG must develop and implement a strong public participation process that meaningfully responds to and incorporates community priorities. All materials must be readily accessible and translated to Spanish, Hmong, and any other language necessary to meet the needs of Merced's diverse community. All workshops and hearings must be held at a time and location that is accessible to all Merced County residents. MCAG must also demonstrate how it effectively responded to comments, questions, and concerns raised during public workshops and hearings.

### **Prepare a Study to Identify Funding Sources to Meet Goals of APS**

MCAG lacks sufficient funding to fully implement many of our suggestions to reduce GHG emissions and VMTs. We therefore propose that MCAG initiate a study to identify new local revenue sources such as a possible tax measure, impact fees and developer fees. We would be happy to work with MCAG to identify scope such a study to ensure that new funding programs reduces GHG emissions and VMTs while at the same time improving the health and sustainability of existing communities in Merced County.

We further suggest that MCAG establish a grant program to support member jurisdictions' efforts to conduct smart growth planning and make strategic infrastructure investments in existing disadvantaged communities. Discretionary funds from CMAQ, RSTP and GGRF programs can be used to support such a program. This will allow member jurisdictions to immediately address barriers to infill such as infrastructure and public services. Local governments are cash strapped and therefore unable to engage in planning activities to build healthy and sustainable communities. A new grant program will allow them to meet those needs but also to leverage additional state and federal investments.

### **Amend RTP to Include SCS that Meets GHG Reduction Targets**

Finally, we recommend that if the APS meets the GHG reduction targets established by the California Air Resources Board that MCAG immediately initiate an RTP amendment to incorporate the APS into the SCS chapter. This will allow MCAG to fully comply with SB 375 and to leverage funding opportunities available at the state level for projects that are consistent with the region's SCS.



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Analysis of Why the SCS Failed to Meet GHG goals

A major component to the APS process is the identification and analysis of why the SCS was unable to create a plan that would meet greenhouse gas reduction targets initially. We encourage MCAG to conduct a robust analysis of the GHG impacts road expansion – especially to the extent that they facilitate new town and new subdivision development. We believe active modes of transportation should be taken more seriously than they are in the existing RTP, which proposed allocating the least amount of funding for transportation to such modes.

Thank you for your consideration of these comments. Should you have any questions please contact me directly at [khammond@leadershipcounsel.org](mailto:khammond@leadershipcounsel.org) or at (559) 387-4440.

Sincerely,

Kaylon Hammond  
Policy Coordinator