Peck Planning and Development, LLC
Planning Development Economics

March 15, 2021

Merced City Council
City of Merced
678 18th Street
Merced, CA 95340

City Clerk: cityclerk@CityofMerced.org

Thank you for the opportunity to comment on the draft recommendation for a pre-annexation agreement. I am commenting on this matter on behalf of the Virginia Smith Trust (VST). Please refer to our correspondence of March 8th which has been included in Council's agenda correspondence. We'd like to emphasize a few points made in that letter.

First, the numeric limitations that have been quoted are based outdated inputs and assumptions from the 2007 sewer plan. Since 2007, new building codes have resulted in a 45% reduction in residential sewer flows. The flows from UC are also overstated. Both the City and VST are conducting flow monitoring to nail down the right inputs, and we encourage you to wait for the results of those studies before finalizing any numeric sewer constraint. Taking a realistic look at actual remaining sewer collection system capacity will help the city take a longer-term, measured approach, rather than a hasty, short-term one.

We encourage the use of "readiness" as an allocation factor. The requirements in the proposed allocation criteria, however, are difficult, if not impossible to attain, even under expedited City plan check review. The criteria should reference community benefits and standards more thoroughly and comprehensively, and should clearly state what items are of higher importance. Community benefits could include environmental benefits such as reducing vehicle miles travelled (VMT) and associated greenhouse gas emissions; implementation of water conservation (and sewage generation) strategies; and, meeting an urgent development need (such as multifamily housing or other affordable housing).

Sincerely,

Stephen J. Peck, AICP

President, Peck Planning and Development, LLC

Xc: Scott McBride, Development Services Director
Dr. Steve M. Tietjen, Ed D
Stephanie Dietz, City Manager