

Existing Streets and Roads

Writer	Comments
Kay Bertken, League of Women Voters	<p>Be explicit in the local streets narrative referencing the idea of complete streets. This is the concept behind integrating active transportation with street paving under this funding category.</p> <ul style="list-style-type: none"> · In the potential projects list under the local streets heading, please include tree planting for heat abatement and shade. It is mentioned as landscaping in a narrative paragraph but not in the list. · Prioritize street-calming measures to streets with high numbers of traffic/pedestrian/bicycle accidents · Prioritize tree planting on streets identified by the COG study. · To maximize the use of funds and where feasible, integrate sidewalk, bike lane, landscaping and/or internet cabling in street paving work.
Joby Jones, Pastor, Stop the Violence Fresno	<p>“Measure C funds shall be allocated using an equity-first framework that prioritizes project areas demonstrating persistent, documented need within disadvantaged neighborhoods and communities. Need shall be defined through objective, publicly verifiable metrics—including but not limited to CalEnviroScreen scores, Healthy Places Index data, collision and safety data, transit access gaps, and documented histories of underinvestment. Jurisdictions must apply these criteria consistently across all project submissions. Allocation decisions shall be accompanied by an annual Equity Impact Report detailing how funds were prioritized, which communities benefitted, and how outcomes align with the established metrics. This process shall ensure that investments are proportionate to need, transparent to the public, insulated from political influence, and structured to correct historic disparities rather than reproduce them.”</p> <p>“For too long, some neighborhoods in our county have carried the weight of neglect—broken streets, unsafe crossings, poor transit access, and infrastructure that never seems to reach their side of town. Measure C’s equity commitment is simple: the communities with the greatest need should get the greatest attention. This isn’t about taking from one neighborhood to give to another; it’s about finally investing where the damage has been the deepest. By using real data, transparent reporting, and community accountability, we ensure every dollar goes where it can do the most good. Equity isn’t a slogan—it’s a promise that the people who’ve been overlooked the longest will no longer be last in line.”</p>
Dr. Esmeralda Diaz, Organización La Panchas	<p>I have a suggestion for the Vision and Priorities section on page 2. Under Fix What Matters Most, I recommend including the phrase “worst of the worst” (as evidenced by the Triennial PCS) to emphasize the greatest areas of need in our communities.</p>
Artie Padilla, CVCF	<p>CVCF agrees with including 'Transit Oriented Development' as an eligible project under Local Streets and Roads within the Implementation Guidelines. We request that the following language be added: "A local jurisdiction may use 'Local Streets and Roads' funding to support infrastructure and other costs associated with developing mixed-use housing in zone districts that allow a mix of uses and include multi-family housing within existing neighborhoods. Each jurisdiction shall ensure that at least 20% of units within the project are restricted to extremely low, very-low, and low-income units."</p>
Scott Mozier, City of Fresno	<p>1. Page 10, “Definitions”, “Reconstruction” should read “includes any milling & overlay or pavement structural section replacement (i.e. full reconstruction, cold-in-place recycling, full depth reclamation), or widening of the roadway, if the widening is necessary... [“sealing” should be removed from the “Reconstruction” definition]</p>

2. Page 13, section 8, "Complete Street features": At the end of the first sentence ("...shall include 'Complete Street' features"), add the following: "...where feasible, unless the project qualifies for an exception as noted in this section." At the end of paragraph 8, add a new sentence: "Exceptions to the Complete Street feature requirements may be made by the agency for the following reasons: (a) The street to be repaved has developable parcels within the project limits, which will be required to construct curb, gutter and sidewalk frontage improvements at time of development; (b) The complete street features would cost more than 25% of the street repaving; (c) Acquiring the necessary right-of-way to construct the complete street features would either result in a full acquisition or require eminent domain to obtain; (d) The planned complete street features have generated significant community opposition at a public meeting.
3. Page 17: "Bicycle and Pedestrian Facilities Maintenance" – The "Ongoing maintenance" list should be expanded to include: "pavement maintenance, re-striping, signage (install and replace), watering and electricity bills". These four items need to be moved from the "does not include" list to the "including" list.
4. Page 14, paragraph 6, add "traffic signal timing, traffic operations centers and Intelligent Transportation System components".
5. Pages 14-15, "Examples of eligible projects/phases:", 11th bullet should be expanded to state: "Labor, materials, vehicles and equipment for day labor". Add a new bullet: "Vehicles and equipment for engineers, surveyors and inspectors."

Paul Armindariz, City of
Clovis

Any hiring preference needs to be in compliance with the Public Contract Code and be compatible with federal and state funding requirements, since agencies often use Measure C funds as a match.

Tina Sumner, Bike Fresno

- Page 6 - First paragraph Performance Indicators and Measurements: We do not understand the intent of the second sentence of this paragraph. Is this going to be part of the SIP process? Where do these subcommittees come from?
- Page 7 - First sentence word change: "measured by engineers though" should be changed to "**by** engineers **using** a Pavement Management System".
- Page 7 - Second Paragraph second line word change per Street and Highways Code 890.4: Class 1 (trails) to Class 1 (**shared use paths**).
- Page 7 - Second Paragraph second line word change per Street and Highways Code 890.4: Class 4 (protected bike lanes) to Class 4 (**Cycle Tracks**).
- Page 7 - Second Paragraph second line word change "Safe Routes to School & access" to "Safe Routes to School **Program and** access".
- Page 7 - When saying Mixed-Use Development do you mean **Transit Oriented Development**? Use of Mixed-Use Development goes on throughout the document with no explanation of what mixed use has to do with the use of transit funds. Whereas Transit Oriented Development clearly relates to the use of transportation funds.
- Page 8 - Purpose Paragraph first bullet point: add expressways. Part of Herndon Avenue is an expressway.
- Page 8 - Purpose Paragraph second bullet change per Street and Highways Code 890.4: "new bike lanes" to "new **shared use paths, cycle tracks or trails**".

Nathan Vosburg, Mayor,
City of Coalinga

1. **The draft plan requires that any new or reconstructed road using Measure C funds must include sidewalks AND protected bike lanes on both sides, regardless of context.**
Replace the mandate with a **context-sensitive design** requirement.
Allow each city to determine whether a sidewalk or bike facility is needed based on:
Traffic volume
Land use
Right-of-way constraints
Cost-effectiveness
Measured bike/ped demand

Proposed Amendment Language

“For small cities under 35,000 population, Complete Streets elements (sidewalks, bike lanes, etc.) shall be based on context-sensitive design and local adopted plans, rather than mandated on all new or reconstructed roads.”

2. Modify or Remove the “150-Mile Bike Lane Requirement” and Assign Proportional Targets

Recommended Fix

Shift from a strict mileage mandate to:

A percentage of projects including active transportation **OR**

Allowing small cities to meet the requirement through **maintenance**, not just new construction

The guidelines already allow 20% to be maintained, but this is still unrealistic for rural communities.

Proposed Amendment Language

“Small cities may meet the bike/trail mileage requirement through maintenance, striping, shared-use paths, Safe Routes to School projects, or by documenting that construction is infeasible due to right-of-way or cost constraints.”

3. Remove the 5% Cap on Road Expansion OR Create Small-City Exceptions

Recommended Fix

Create a small-city exemption for:

Safety-driven widening

Industrial/farm-to-market routes

Emergency access projects

School congestion mitigation

New housing developments

Proposed Amendment Language

“Small cities may use up to 20% of Local Streets & Roads funds for safety-oriented widening, turn lanes, shoulders, or industrial access roads.”

4. Remove the “Must Reduce VMT” Requirement for Local Road Projects

Recommended Fix

Exempt rural cities (<35,000 population) from VMT-reduction scoring for Local Streets & Roads.

Proposed Amendment Language

“Rural cities are exempt from VMT-reduction requirements due to geographic and economic conditions.”

5. Remove Climate Mandates That Increase Construction Costs Unnecessarily

Recommended Fix

Make climate requirements optional for small cities.

Proposed Amendment Language

“Climate-resiliency elements are encouraged but not required for small-city projects unless supported by local plans or funding availability.”

6. Remove or Relax the “Five Safe Routes to School Projects Per Year” Requirement

Recommended Fix

Allow small cities to:

Complete SRTS projects every 3–5 years **OR**

Meet requirements regionally as a group

Count crosswalks, striping, lighting, ADA ramps, and signage toward SRTS compliance

Proposed Amendment Language

“SRTS compliance for small cities may be met on a 3–5-year cycle or through regional collaboration.”

8. Give Small Cities Flexibility in Meeting the PCI 70 Requirement

Recommended Fix

Allow small cities to:

Reach PCI 70 over a **longer timeline**

Use alternative compliance pathways (safety, patching, ADA improvements)

Prioritize high-traffic routes rather than every residential street

Proposed Amendment Language

“For cities under 25,000 population, PCI compliance may be achieved over an extended timeline, prioritizing arterials and collectors before neighborhood streets.”

9. Create a Small-City Exemption from the Sidewalk + Protected Bike Lane Mandate on Both Sides of New or Reconstructed Roads

Recommended Fix

Create an **exemption** so small cities can apply context-sensitive design instead of automatic Complete Streets mandates.

The exemption should allow small cities to determine sidewalks/bike lanes based on:

Local circulation patterns

ROW width and geography

Cost and feasibility

Safety conditions

Community demand

Local Active Transportation Plans

Also remove the requirement for **protected** or **separated** bike lanes unless specifically justified by the jurisdiction.

Proposed Amendment Language

“Cities with a population under 35,000 shall be exempt from mandatory requirements for sidewalks and bicycle facilities on both sides of new or reconstructed roads. Complete Streets elements—including sidewalks and bicycle facilities—shall be based on context-sensitive design, right-of-way constraints, safety considerations, and locally adopted transportation plans. Protected or separated bicycle lanes shall not be required in small cities unless locally determined to be feasible and necessary.”

Paul Nerland, County of
Fresno

✓ Increase the Local Neighborhood Streets and Roads allocation from 65% to 70%. It remains clear in every survey that fixing and maintaining existing streets, roads and highways has been and remains the highest priority to Fresno County residents and voters.

Existing Streets and Roads

- ✓ The Guidelines require Fresno County to set aside \$5 million annually for unincorporated disadvantaged communities. Although this provision is well-intentioned; it could harm projects in those communities unless modified. The Guidelines need to be revised and clarified that the \$5 million is a total project cost and not just contract construction cost and it includes all sources of funding (not just Measure C as Measure C funds are leverage against other grants). Furthermore, since most projects take approximately 5 years to deliver, the \$5 million annual expenditure in unincorporated disadvantage communities should be an average over a 5-year review period. In some years, the County may spend over \$5M and in some years under.
- ✓ The Guidelines need to acknowledge that continued maintenance of roads is required even after achieving the 70 PCI and that future funding for this category should be left to the local agency to decide and prioritize. Our local Elected leaders are accountable to the voters and should be empowered to make decisions that are responsive to the highest priorities.
- ✓ Remove reference from the Guidelines to "Vehicle Miles Traveled" and any other terms/items that are already required to be addressed by the cities or county as part of their discretionary and/or environmental review process. There is no need to add layers of requirements that are duplicative.

Paul Armendariz, City of
Clovis

Requirements for reducing VMT and residents having increased access to jobs, services, school, housing via pedestrian, bike facilities and public transit services should be part of overall goals, not metrics.

Why not maintain the current system of PCS maintenance (instead of requiring a regional version)?

Under Required Metrics

Jeffery Martin, County of
Fresno

"The current countywide PCI is approximately 65 and raising it to a PCI of 70 will cost approximately \$5.4 billion over 10 years." - Just above.
Over ten years, this measure will bring in roughly \$1.4b - with roughly \$800m allocated to road maintenance and misc. carveouts from that for active transportation. Gas tax allocations are inadequate to close the resultant gap (hence the continually increasing deferred maintenance costs). These things combine to ensure this metric will be unmet without a substantial additional dollar injection.

Nicole Zieba, City of
Reedley

Suggested added language (underlined):

"2. The goal for the average Pavement Condition Index for jurisdictions under 50,000 should be 70, but minimally should increase by 50% over the life of the Measure."

*New developments are excluded from using Measure C funds, which means that after 30 years, they may be in more decayed stages than other parts of the city. These should not be in the PCI calculation at any point in the process then, if they cannot be maintained using Measure C. However, suggest language stating that "Measure C may not be used on any roads in any developments that were not in existence at the time of Measure C passage until at least 15 years after the development has been opened." (Page 13, Item 5)

**It is going to take decades for some cities to get to 70, so what is the date that the average of 70 must be met?

It should be clearly stated that alleys, while an eligible Measure C use, should not be included in the PCI calculation.

Some cities, like San Joaquin, are at a 35. It would take a tremendous amount of Measure C money to get them to 70, probably more than they will receive through the Measure. Perhaps a notation that cities under 50,000 should have a goal of increasing their PCI percentage rather than a hard and fast 70.

Existing Streets and Roads

Paul Armendariz, City of
Clovis

(The 65 PCI) is too restrictive. This should be an average, not for every street.

Under the metric: "Maintain and build 150 miles of new bike lanes (Class I or Class IV) and trails by 2057, as identified by the Master Plan for each jurisdiction."

Jeffery Martin, County of
Fresno

This seems vague and underdeveloped. Agency responsibilities seem meshed. Point 'c' seems mostly disconnected / triggered by vague conditions.

Nicole Zieba, City of
Reedley

Cities under 50,000 should have a goal of expanding their trail system, but should not have a mandated number, as there is no ability for the City to guarantee it can acquire right-of-way from private property owners except through the use of eminent domain, which is strongly discouraged. Bigger cities may have the ability to reroute trails and avoid costly pieces of land, but small cities simply do not have the geographic benefit of being large enough to do that. Also, smaller cities cannot apply for many grants or are not as competitive as larger cities in these grants, as they do not have the required match dollars and staffing capacity to complete these projects at the pace that is expected, or are not as competitive due to smaller mileage of segments.

Smaller cities do not have capacity to do trail projects annually, and it may take years and a lot of \$\$\$ to acquire right-of-way, relocate PG&E and other utilities that the City does not control, and acquire other funds to possibly extend water, sewer, and storm drain mains. The goal is good, but a mandate is not.

Suggested language:

b. The goal for the remaining cities and the County is 45 miles, or at least a 50% increase in the miles of existing trails. Priority in funding competitive trail projects for cities under 50,000 will be given to projects that demonstrate the ability to connect existing trails, expand trail systems, and provide shade through trees and other means for pedestrian areas along the trail.

Mona Cummings, Tree
Fresno

Complete Rewrite:

Maintain a jurisdiction's Class I, II and IV facilities to ensure both safety and comfort.

In addition, build 90 miles of new Class I and 60 miles of new Class IV facilities in the Fresno and Clovis urban area by 2057.

Once a city's population exceeds 50,000, it will be subject to similar proportional requirements regarding Class I and Class IV facilities.

(Note: Does not include "maintain" as part of the "new build" requirements.)

Complete Rewrite:

The requirement of new Class I and Class IV facilities will be limited to the urban areas of Fresno and Clovis (including County islands) until any remaining city's population exceeds 50,000.

Complete Rewrite:

The remaining cities shall be responsible for building a comparable number of miles of Class I and Class IV standards once their population exceeds 50,000.

Complete Rewrite:

Every 10 years of the Measure, the cities of Fresno and Clovis, as well as the County of Fresno, will be responsible for building their proportional amount in the urban areas of Fresno and Clovis (based on the square miles each jurisdiction is responsible for) of at least: 30 miles of new Class I facilities and 20 miles of new Class IV facilities.

Safe Routes to Schools projects that include new Class I or Class IV facilities may be counted toward satisfying this requirement.

Key deletion: "Up to 20% of this requirement may be met by routine maintenance."

Suggested language: Rural trails do not qualify for Class I funding under Measure C. Rural trails will generally be located in areas outside of the incorporated cities. Rural trails will typically be recreational in nature.

Complete Rewrite:

Funding for newly built Class I and Class IV requirements may also be met through a combination of other State, Federal and local funding sources, aside from Measure C. Safe Routes to Schools projects that include Class I or Class IV facilities may be counted toward satisfying the Class I and Class IV requirements.

Paul Armendariz, City of
Clovis

What's the rationale behind the 150-mile target? This should also include Class II.

Does this include all trails? Can unimproved trails along canal banks be included?

New bike and trail facilities as shown in the Master Plan will largely be constructed by new development and is tied to when/if that development occurs.

What are the respective shares (of the 105 miles) for Fresno and Clovis? How was this determined?

What is the basis for the 20% (maintenance) figure? Routine maintenance should be defined.

Tina Sumner, Bike Fresno

An overall comment is that the 150 mile requirement is quite low as it is only five miles a year for the entire county. It is our recommendation that the requirement be increased to 225 miles or more. The increased requirement is even more important given that the required miles can be met with non-construction activities.

Page 8 - Required Metrics Paragraph number 1: add expressways.

Page 8 - Required Metrics Paragraph number 2: change per Street and Highways Code 890.4: "new bike lanes" to "new **shared use paths, cycle tracks or trails**".

Page 8 - Required Metrics Paragraph letter C: at least 50 miles of trails should read at least 50 miles of **new shared use paths, cycle tracks or trails**. This should be consistent with language as stated above. Regarding the language "target is not reached in any given year" this does not make sense as it has never been stated what the annual target is.

Page 9 - Required Metrics number 3: change "improved walkability, safety" to improved walkability, **bikeability**, safety".

Page 10 - Active Transportation Plan Requirements Paragraph second checkmark: change "bike lanes" to "**bikeways**".

Susana Ledesma
Camacho, City of Orange
Cove

1. "The average Pavement Condition Index (PCI) for each jurisdiction will be 70, including arterials, collectors, and neighborhood streets."

BY WHEN WILL THIS NEED TO BE MET? BY THE END OF THE 30 YEAR PLAN? BY THE 10-YEAR MARK? SUGGESTION TO INCLUDE A TIMEFRAME.

a. "By year 11, at least 50 miles of trails must be completed if the target is not reached on any given year"

Please elaborate. Will this be collectively, just urban areas, or proportional?

Under Eligible Agencies/Formula Split

Jeffery Martin, County of
Fresno

The County maintains more than half of the road miles in our area. The regional road network allows goods and people to transit between the cities, between many of the largest businesses in the area, and even through and within the islands. The more rural roads also tend to take heavier-duty traffic that require costlier repair options.

Existing Streets and Roads

Erin Haagenson, County of Fresno	<p>The inevitable combined impact of the 80/20 shift, almost eliminating the regional road allocation, complete street requirements, preventing reasonable allocations for capacity expansions, and shifting substantial additional funding to the barely used transit systems, would be costlier repair/reconstruction options and a continually deteriorating road network outside of short distances from the urban core and suburban outlier cities.</p> <p>75/25 split as in the current measure would be preferred.</p>
Jeffrey Martin, County of Fresno	<p>Under Other Requirements "No more than 5% can be spent on road expansion or capacity projects"</p> <p>This would limit annual capacity expansion projects to ~\$1m/year. For the County's regional connectors, that amounts to virtually nothing (maybe an occasional passing lane?). It may take 30 years to complete a single decent-sized project between two cities.</p>
Paul Armendariz, City of Clovis	<p>How was the 5% derived? Seems too restrictive for gap projects.</p> <p>Recommended language: The Measure encourages limiting spending on road expansion or capacity-enhancing projects; however, such projects remain eligible for funding when they demonstrate significant safety, mobility, or economic benefits. Eligible projects include: a. Dedicated transit lanes b. Dedicated and protected bike lanes or trails c. Safety-motivated turn lanes or intersection improvements d. New or reconstructed roads funded by the Measure should include sidewalks and bike lanes on both sides, where feasible</p>
Susana Ledesma Camacho, City of Orange Cove	<p>"No more than 5% can be spent on road expansion or capacity projects"</p> <p>Elaborate on what the 5% is.</p> <p>i.e.: 5% of the allocation of Measure C dollars by jurisdiction....</p>
Paul Armendariz, City of Clovis	<p>Suggest deleting (provision disallowing widening under reconstruction). Some reconstruction projects may require a need to complete an unwidened section. Delete section addressing roadway restriping to repurpose existing travel lanes for bicycle facilities as long as it doesn't increase overall paved width. Rural trails definition should include unimproved pathways along waterways. Requirement in Metro area that Class I facilities shall be built so that at-grade crossings are limited to one every one-half mile at signalized intersections are too restrictive. These should be designed and built as is needed for respective jurisdictions. Language prohibiting funds to be used to support new growth areas or new town development not already in existence is too restrictive. Measure C funds should be allowed to be used to maintain improvements constructed after passage of the Measure.</p> <p>Under Other Requirements "d. New roads constructed or reconstructed in whole or in part with Measure funds shall include sidewalks and protected bike lanes on both sides of the road for use by pedestrians and cyclists"</p>
Jeffery Martin, County of Fresno	<p>Sidewalks and protected bike lanes are an impractical and expensive requirement in all non-urbanized settings, owing to right of way concerns and project lengths.</p>
Susana Ledesma Camacho, City of Orange Cove	<p>"New roads constructed or reconstructed in whole or in part with Measure funds shall include sidewalks and protected bike lanes on both sides of the road for use by pedestrians and cyclists "</p> <p>This will not always be feasible or appropriate. Some projects may have ROW acquisition issues, grading issues, etc. that may overburden a project.</p>

Suggestion to include verbiage that it will be recommended but not a must:

..., if feasible as determined by the (Jurisdiction/FCTA).

Elaborate on reconstruction. What will differentiate maintenance measures from reconstruction?

Under Other Requirements: "The County of Fresno is annually required to spend a minimum of \$5 million per year of its local allocation in identified Disadvantaged Unincorporated Communities as defined by Government Code 65302.10.

Erin Haagenson, County of Fresno Could be expressed either as an annual percentage or over the life of the measure. Also if transportation grants from other sources for disadvantaged communities were able to count towards this requirement (leveraging) it could incentivize DUC investments.

Under Other Requirements: 8. All streets and roads constructed or improved in whole or in part with Measure C funds shall include "Complete Street" features.

Jeffery Martin, County of Fresno Full complete streets components don't make sense outside of population centers. Curbs, gutters, sidewalks, bike lanes and drainage facilities are not reasonable or cost effective options in most rural areas, where a maintained shoulder and proper slope can provide most of the same operational benefits.

Nicole Zieba, City of Reedley Item 4, suggested language (underlined) – Projects funded in part of entirely with Measure revenues must incorporate design and implementation elements that address heat, increased precipitation and flooding, wildfire management, and air quality improvement. Depending upon the project, this may include:
a. Where feasible, adding and maintaining shade trees along pedestrian walkways, bike lanes, and trails in public right-of-way. All projects shall show an analysis of which elements have been considered for each project. If found not to be feasible to include trees or shade canopy elements, projects shall be required to document why elements were not included.

Under Bicycle and Pedestrian Facilities Maintenance: "Ongoing maintenance shall NOT include paying for the cost of water or electricity"

Erin Haagenson, County of Fresno For the County, some allowance should be made to pay for these ongoing costs, even if it was a very limited percentage of an allocation; as lack of funding for ongoing costs may prevent them from being installed, especially in unincorporated areas.

Paul Armendariz, City of Clovis Suggest deleting "resurfacing of asphalt except for spot repairs" and "paying for cost of water and electricity." If new or replacement signage is needed along an existing Bike and Ped Facility, Measure C should be available to fund those improvements

Tina Sumner, Bike Fresno Page 10 - Active Transportation Plan Requirements Paragraph second checkmark: change "bike lanes" to "**bikeways**".
Page 10 Performance Indicators Paragraph: dots 11 and 12 change " miles of bike lanes" to "miles of **bikeways**".

Page 11 Program Implementation Paragraph definitions: drop the second and third arrows regarding rural trails as we concur with Mr. Westerlund's comments that Measure C is intended to fund transportation projects not recreational projects; however, Class 1 bikeways in rural areas that link rural communities and/or cities should be built in accordance with the California Highway Design Manual Chapter 1000 as defined in the following arrow.

Page 12 Program Implementation Other Requirements Paragraph item 3b: change "protected bike lane" to "**cycle tracks**" and change "trails" to "**shared use paths**".
Page 12 Program Implementation Other Requirements Paragraph item 3d: change "shall include sidewalks and protected bike lanes" to "**shall include sidewalks and either bike lanes or cycle tracks**".
Page 14 Paragraph Eligible Projects Item 7: after "traffic calming" in the second line there should be a comma instead of a parenthesis. You can eliminate the words "protected bike lanes" because bikeways include protected bike lanes.

Page 15 Paragraph Eligible Projects Active Transportation item 3: why have expressways been dropped? It is recommended that expressways be included. As stated above Herndon Avenue is an expressway. Expressway corridors need to have bicycle and pedestrian accommodations for through travel for these mode of transportation.

Page 15 Paragraph Eligible Projects Active Transportation item 3: change "shall include sidewalks, paths" to "shall include sidewalks, **bikeways**, paths". Also add to the end of Item 3: "Expressways constructed in an urban area can meet this requirement by including a sidewalk, bikeway, path, walkways or equivalent facility on one side of the roadway." This relates to construction or reconstruction on Herndon Avenue.

Page 15 Paragraph Eligible Projects Active Transportation item 6: Why was expressway dropped? The four foot shoulder referred to in the second sentence would not be wide enough for a cycle track. This same language is used in the last sentence on the page. Cycle track should be dropped. In the third sentence reading "superarterial or collector" should read "**super-arterial, arterial or collector**".

Susana Ledezma
Camacho, City of Orange
Cove

1. "Projects funded in part or entirely with Measure revenues must incorporate design and implementation elements that address heat, increased precipitation and flooding, wildfire management, and improve air quality. This includes: ..."

Like the previous point. Implementation of this as a "must" will not always be feasible. Adding trees and corresponding maintenance is expensive and can significantly overbudget a project.

Suggestion to include verbiage that this is recommended when applicable : "...if feasible as determined by the (Jurisdiction/FCTA)."

Under Active Transportation

Paul Armendariz, City of
Clovis

The determination of appropriate bicycle accommodations must rest with the traffic engineer's professional review. A blanket requirement for a 4-foot striped shoulder may not align with site-specific safety, operational, or cost considerations. Engineering judgment ensures that bicycle facilities are provided where they enhance safety and mobility.

Under Program Management

"In addition, two 10-year review periods (in 2037 and 2047) will be incorporated into the Measure's timeline, with a robust public outreach process and notification requirements to determine whether the established metrics are meeting their intended goals and whether new transportation options should be included or older ones removed. "

Susana Ledezma Camacho
City of Orange Cove

Verbiage used can be interpreted as limiting to including and removing only. Suggestion to change to: "...modified."

Under Program Implementation

"Every three years there will be a compliance evaluation where jurisdictions must show how they have spent their Existing Neighborhood Streets and Roads Repair and Maintenance Program funds. Agencies, however, will be allowed to accumulate funds for up to six years if needed for match purposes or for a large project."

Susana Ledezma Camacho
City of Orange Cove

Smaller Cities will be affected by this. They will need to account for time spent on RFP finding consultants, funds, staffing, ROW acquisitions, design challenges, etc. Each project will face their own challenges that may take +4 years rather than 3 years. Suggestion to reword the last sentence to:
Agencies, however, will be allowed to accumulate funds for up to six years, or any time extension as approved by the FCTA, if needed for match purposes or for a large projects.

Under Safe Routes to Schools

Existing Streets and Roads

Susana Ledezma Camacho
City of Orange Cove **"Funds may be used to reach compliance with AB 382, lowering speed limit in school zones to 20 MPH by January 1, 2031. When updating signage and other compliance needs in school zones, jurisdictions may and are encouraged to make other SRTS improvements at projects where needed and appropriate."**

Who will decide what counts as appropriate or necessary. Will this be determined solely by the jurisdiction? I left as is, this may lead to misunderstandings during the compliance review.

Susana Ledezma
Camacho, City of Orange
Cove **"Every 10 years throughout the life of this measure, numbers of serious injuries and fatalities of students will be assessed for reductions in all school districts. If reductions are not met every 10 years, a plan shall be required for meeting reduction metrics in future years."**

What is the baseline for serious injuries and Fatalities? How much reduction is required?

Public Transportation

Public Transportation

Writer	Comment
Nathan Vosburg, Mayor, City of Coalinga	<p>7. Fix the Transit Allocation Imbalance (70% FAX) AND Create Flexible Mobility Options for Small Cities Based on Demonstrated Inefficiencies (Including Coalinga's Data)</p> <p>Recommended Fix Adjust the transit allocation to: FAX: 55–60% FCRTA: 25–30% Clovis: 10–15% This restores fairness and ensures rural cities receive a greater share of the transit dollars they contribute.</p> <p>Flexible Mobility Options for Small Cities (Population < 35,000)</p> <ul style="list-style-type: none">A. Local Fixed-Route Circulator (Optional)B. On-Demand MicrotransitC. Transit Vouchers & Mobility SubsidiesD. Workforce Transportation & VanpoolsE. Transit-Supportive InfrastructureF. Carshare / EV Carshare / Shared Fleet Programs <p>"Cities under 25,000 population may use their proportionate share of Public Transportation Program funding for microtransit, on-demand service, local fixed-route circulators, transit-supportive infrastructure, mobility vouchers, carshare programs, workforce transportation, vanpools, or any flexible mobility solution that meets local needs. The fixed transit allocation formula (70/20/10) shall be modified to ensure rural communities receive an equitable share of transit funding proportional to their needs and service realities."</p>
Bethany Berube, Clovis Transit	<p>For the metric: "Increased public transportation ridership by 2047"</p> <p>Each agency should be measured against its own ridership baseline, not against one another.</p> <ul style="list-style-type: none">Performance metricsPassengers per revenue hour, andPassengers per revenue mile <p>Ridership growth depends almost entirely on costly factors such as increasing frequency, span, low cost or no cost fares. This requires more service, but Measure C funding is fixed.</p>
Bethany Berube, Clovis Transit	<p>For the metric: "For the metric: "15-minute frequencies in urban areas""</p> <p>This metric should be interpreted as requiring high-frequency service on key urban corridors—not every Clovis Transit route. This needs to be clearly defined.</p> <p>Example Definition: "15-minute frequency applies to designated high-demand routes, not every route. Operators define these priority routes based on ridership, density, and operational feasibility."</p>
Greg Barfield, FAX	<p>15-minute frequencies in urban areas as warranted by ridership, demand or need.</p>
Janelle Del Campo, FCRTA	<p>For the metric: "For rural areas, comparable travel times to personal vehicle use"</p> <p>For rural areas public transit cannot achieve comparable travel times to personal vehicle use due to long distance of a route, time for bus stops, wheel chair passengers, individuals with mobility devices, passengers with bikes</p>
Jeffery Martin, County of Fresno	<p>Not attainable. Policy objectives can be stated, but ridership cannot be increased in rural areas to justify the level of service needed to support this as a realistic metric.</p>

Public Transportation

Bethany Berube, Clovis Transit	<p>For the metric: "Enhance accessibility by reducing the average distance or time it takes to get to a bus stop"</p> <p>Clovis needs clear guidance on how this distance will be calculated and must be allowed to account for locations where new stops cannot be safely or feasibly installed.</p> <p><i>Adding stops increases trip time which contradicts Metric 8.</i></p>
Bethany Berube, Clovis Transit	<p>For the metric: "Increase in microtransit and on-demand transit services across the county"</p> <p><i>We support microtransit as long as Clovis can define the service parameters and locations. That includes limiting the service area and using it as a connector or feeder to our fixed-route system rather than expanding into a full countywide model we can't sustain.</i></p> <p>This could reduce funding available for frequency (Metric 2).</p>
Greg Barfield, FAX	<p>1. Increase in microtransit and on-demand transit services across the county <i>as studied by each transit provider.</i></p>
Bethany Berube, Clovis Transit	<p>For the metric: "Enhance reliability and efficiency by improving on-time performance, measured by the percentage of trips that run on schedule"</p> <p>Clarification that our headway-based system can use headway adherence (bunching/gap indicators).</p>
Bethany Berube, Clovis Transit	<p>For the metric: "Reduce travel time by reducing the average trip duration "</p> <ul style="list-style-type: none"> Clarification on how "average trip duration" will be defined (entire in-vehicle trip, door-to-door, or origin–destination). Confirm that service redesigns already implemented can count as early progress toward this metric.
Janelle Del Campo	<p>In rural areas the trip duration cannot be reduced due to the high mileage traveled.</p>
Bethany Berube	<p>For the metric: "Improve public transit-supportive infrastructure by increasing the number of bus stops that meet ADA accessibility standards"</p> <p>Federal and state law already require ADA access, but some systems have existing stops that may not fully meet current standards (pads, slopes, paths of travel, etc.).</p> <p>Clarify whether improvements at a group of key stops (rather than every single stop) will be recognized as meaningful progress.</p>
Greg Barfield, FAX	<p>Improve public transit-supportive infrastructure by increasing the number of bus stops that meet ADA accessibility standards as required by local, state and federal law <i>assuming right a way is available to support.</i></p> <p>For the metric: "Increase the proportion of multimodal access points that are ADA compliant and increase bicycle, sidewalk, and pedestrian facilities infrastructure leading to bus stops"</p>
Bethany Berube, Clovis Transit	<p>Metric 10 belongs under Streets & Roads and Active Transportation, not Transit. <i>Transit cannot absorb these capital obligations without losing the funding needed for service delivery.</i></p>
Greg Barfield, FAX	<p>Increase the proportion of multimodal access points that are ADA compliant <i>as required by local, state and federal laws where possible</i>, and increase bicycle, sidewalk, and pedestrian facilities infrastructure leading to bus stops <i>working with public works department(s) of area jurisdictions to add to public works projects.</i></p>
Janelle Del Campo, FCRTA	<p>This metric should be moved to another category, public transit should not be responsible for infrastructure such as curb, gutter and sidewalk.</p>
Bethany Berube, Clovis Transit	<p>For the metric: "Increase accessibility of schools, population centers, employment centers, and other services with multiple modes of transportation"</p> <p>Clovis already provides direct and frequent access to schools, employment centers, medical sites, and community destinations. <i>Metric 11 should recognize existing accessibility, not assume deficiencies or require unnecessary route expansion.</i> Any measurement must account for systems that already meet this standard.</p>
Janelle Del Campo	<p>FCRTA makes a good faith effort to provide service to places such as schools but there also needs to be willing partnerships so the transit agency does not have to absorb all the costs.</p>
Bethany Berube, Clovis Transit	<p>For the metric: "Maintain and expand transit services and programs for those with special needs – students, veterans and active military seniors, and persons with disabilities, and low-income populations"</p> <p>Clarify whether this metric is mostly qualitative (no net reduction in access) or tied to specific quantitative thresholds (ridership, coverage, hours).</p>

Public Transportation

Clarify how “low-income populations” will be identified (Census tracts, equity maps, etc.).

Bethany Berube, Clovis Transit	<p>For the metric: "Increased participation of community residents, representative of Fresno County’s geographic and demographic characteristics"</p> <p>Clarify what counts as sufficient participation.</p> <p>Clarify how representativeness will be assessed (demographic data, ZIP codes, etc.), especially where sample sizes are small.</p>
Greg Barfield, FAX	<p>Increased participation of community residents, representative of Fresno County’s geographic and demographic characteristics following federal Title VI reporting and documentation and language(s) of study area(s).</p>
Greg Barfield, FAX	<p>Each of the three public transportation providers will receive an annual allocation of Measure C Renewal funding for supporting and improving public transit services. Fresno COG will receive periodic funding to update the Short Term (2-5 years) and Regional Long-Range Transit Plans up to 30 years out.</p>
Greg Barfield, FAX	<p>By January 1, 2030, each public transportation agency shall have developed and adopted an updated Short Range service plan covering the next 2-5 years, that promotes system connectivity and accessibility, closes service gaps, and improves and may add expanded service levels based on needs.</p> <p>1. Each public transportation agency is required to engage members of the public, host public meetings, and allow for public review and comment prior to plan adoption. The final plan must explicitly address how community input was integrated in the final plan as seen and reported in a Title VI evaluation study.</p>
Greg Barfield, FAX	<p>Urban and rural public transportation operators are required by California State law under the Transportation Development Act, (TDA), to undergo performance audits every three years.</p>
Greg Barfield, FAX	<p>Under performance measures</p> <p>Safety and Security Events (including major vs minor incidents, Passenger Assaults and Employee Assaults)</p> <p>New measurement for larger transit agencies in 2024 moving to all in the future years.</p> <p>To ensure development of quality performance measures for public transportation, it is envisioned that a <i>Measure C Transit Subcommittee</i> with technical support of staff from the urban and rural transit agencies along with ---, Fresno COG will be formed to assist review and share in the development of performance measures.</p> <p>Look at using the SSTAC of COG with an expanded focus for the Measure C Transit Subcommittee.</p> <p>Under Funding Allocations</p> <p>Public transit supportive infrastructure such as: ADA infrastructure, sheltered and weather protective bus stops; lighting at bus stops; , trash disposal, ; enhanced pedestrian and bicycle facilities that improve access to transit stops; optimized traffic signals to optimize for smoother traffic flow; investments in modern vehicles and technology like real time tracking and audible announcements for passengers. At main hubs and transit centers where possible consider water stations and public restrooms.</p>
Bethany Berube, Clovis Transit	<p><i>Before Measure C funds are allocated to public transportation agencies within Fresno County, the Authority must ensure sufficient revenues are available for continued support for paratransit door-to-door van, taxi, and other transportation services for seniors (62 years old and older), veterans, and people with disabilities who are unable to use fixed route transit service. Includes operations support, replacement of accessible vans, and replacement and upgrades of supporting equipment</i></p> <p>This does not define “enough” and is a condition before allocating the funds. Clarification about what constitutes enough and how it will be determined.</p>
Janelle Del Campo, FCRTA	<p>Programs such as taxi and senior scrip should continue to be administered and operated by the FCOG to continue a countywide program, transit operators should focus on enhancing their existing public transit services only.</p>
Greg Barfield, FAX	<p>Are we talking ensuring state and federal funds are available for operations??</p>
Erin Haagenson, County of Fresno	<p>If State law in the future prohibits the use of TDA for road purposes, changes to the transit allocation need to be made at that time, perhaps the 10 year mark for revisiting allocations in the measure.</p> <p>Under Requirements</p>

Public Transportation

Bethany Berube, Clovis Transit	<p>Administration of countywide mobility programs such as Taxi Scrip should remain with FCOG. Transit operators should not be required to administer or fund these programs as they would divert limited resources away from core service delivery.</p> <p>Guidelines should explicitly state that each agency maintains authority over its own route structure, service design, and operational decisions, with coordination intended to enhance mobility rather than modify local control.</p>
Greg Barfield, FAX	<p>Under Examples of Eligible Projects</p> <p><u>Revenue service</u> Fleet conversion <u>by 2040 as required by the State of California's Innovative Clean Transit (ICT) regulations</u></p> <p><u>Assistance in</u> Expanded Senior Scrip program to include seniors 62 years and older and people with disabilities <u>with COG staff</u></p> <p><u>Maintenance, Administrative and Customer Service facilities maintenance, upkeep and facilities expansion.</u></p> <p><u>Match of up to 20% for any local, state or federal grants.</u></p>
Dr. Amber Crowell, Center for Community Voices	<p>Low-cost, zero-fares should be under the Access and Innovation category</p> <p>Carpool/Vanpool programs should be listed under Public Transportation category, not Access and Innovation</p>
Susana Ledezma Camacho, City of Orange Cove	<p>Under Clear Timelines for Oversight and Reporting</p> <p>To maintain trust, the program has built-in review points ...:</p> <p>What will be the time line for the review of the individual jurisdiction's financial audits? Will compliance/non-compliance notices be delivered to each jurisdiction within 30 business days?</p> <p>When will the reports be due? At the end of a Jurisdiction's fiscal year, End of the Year, December 31?</p> <p>Is there a specific format requirement? PDF, hard copy, etc?</p> <p>Suggestion to change this to every 2 years for smaller Cities. Many small cities like Orange Cove have limited staff and funds to prepare the data needed for the report. Orange Cove will most likely need to hire Consultants to complete this task, that alone adds additional time spent in preparation for RFPs, Finalizing a contract, etc.</p>

Regional Connectivity

Writer	Comment
Paul Nerland, County of Fresno	✓ Increase the Regional Transportation Program allocation from 5% to 18%. Regional highways and County roads are critically underfunded and carry 95% of all trips throughout Fresno County. The roads that lead to each of our small rural cities and unincorporated communities are built and maintained through this program. Underfunding this category would mean the County would not be able to leverage the volume of state and federal dollars to both maintain and expand this critical infrastructure. Regional transportation is key to growing economic development in this County.
Erin Haagenson, County of Fresno	In this section, why is the state highway system prioritized over county roads? There should be some official division of how much goes to the State Highway System and how much to regional connector (likely County) roads. Perhaps a safety calculation could help identify roads in this category.
Wendy Ozburn, Firebaugh	Aside from the Fresno Yosemite International Airport, Fresno County (I believe) includes the following additional 6 public-use airports: 1) Fresno Chandler Executive Airport, 2) Reedley Municipal Airport, 3) Selma Airport, 4) Firebaugh Airport, 5) Coalinga Municipal Airport, and 6) William Robert Johnston Municipal Airport (Mendota). Given the \$73,986,132 (1%) towards Regional Connectivity, airports that are in rural farming areas such as "Firebaugh", these airports are essential for crop production. Representing an agricultural community, we are dependent on our small airport in order to facilitate the required crop/plant herbicides and pesticides applications via aircraft - not to mention that our airport is for PAX as well. Speaking for the City of Firebaugh, we ask for a portion of the 1% of funds allocated towards Regional Connectivity. If not, can you explain as to why <i>only</i> the City of Fresno is afforded the opportunity to received the 1%?

Access and Innovation

Writer	Comment
Erin Haagenson, County of Fresno	Under Eligible Programs, Autonomous Vehicle Infrastructure More funding may need to be devoted here in the future, another reason to officially review the allocations at the 10 year mark.
Dr. Amber Crowell, Center for Community Voices	Low-cost, zero-fares should be under the Access and Innovation category Carpool/Vanpool programs should be listed under Public Transportation category, not Access and Innovation

Administration

Writer	Comment
Artie Padilla, CVCF	<p>The purpose of a citizens Oversight Committee should be to provide the public with assurances that voter approved funding is being spent in accordance with the adopted spending criteria (“ballot measure promises”).</p> <p>The oversight committees credibility will depend in part on public perception that members of the committee are well-informed and speak as an independent voice beholden only to the public. Effective oversight, committees, work best if they are chaired by persons of stature and integrity, and if the membership of the committee provides representation across the public that it serves.</p> <p>The oversight committee serves a management audit and public reporting function. It is not a governing body in any other respect. The committee should be tasked to provide an independent annual report to the public and, if desired by the committee, to control its own agenda and staff support.</p> <p>The oversight committee should meet quarterly to review program operations. Membership of the committee should be subject to a public application and selection process, and appointments should be made by the COG board (or a committee of the whole) so that it is clear to the public that members are not beholden to any individual official or interest group. The Committee should have access to the most senior members of the implementation staff, as well as technical staff. Our meetings should be held in public in accordance with the Brown Act. Members of the oversight committee should be subject to annual conflict of interest filings.</p>
Diana Sedigh-Darbandi, FCTA	<p>The FCTA is submitting the following comments for public record following the discussion of the Draft 2026 Measure C Renewal Expenditure Plan Implementing Guidelines regarding Section 5, Administration category by the steering committee on November 19, 2025.</p> <ol style="list-style-type: none">1. The proposed reduction of .5% from 1.5% in the current measure to the proposed 1.0% is a significant reduction when additional requirements are being included in this renewal measure under this category.2. The addition of “Creating, maintaining and disseminating information from a public database focused on outcomes, performance metrics, etc.” is problematic without the adequate resources (staffing and or consultants) to fulfill this requirement to a high level of standards and expectations with the cost of technology (software) and maintaining the data base as required. Technical or Consultant services such as these have historically come out the services and supplies category. (A copy of the FY25-26 Measure C budget has been included for reference to the services and supplies costs vs. administration cost.)3. The addition of “Providing technical assistance enabling jurisdictions to comply with the requirements and leverage funds to implement projects” is extremely problematic without the resources and technical expertise to provide this type of assistance to the many local jurisdictions for successful results. The need for consultants and RFP development is timely and costly with the proper oversight and resources to implement a successful process. As mentioned in paragraph 2, technical services should come from services and supplies and not the administrative category. <p>Your reconsideration of this reduction in the Administration allocation category of 1.0% back to 1.5% is strongly recommended by the FCTA to successfully comply and deliver the tasks that have been added to the Measure C renewal.</p> <p>Thank you for the opportunity to comment on the Draft Implementation Guidelines, I look forward to a response from your team.</p> <p>If they should have any questions or require additional information, please contact me at 559.243.8906 or via email at dsedighd@cs.com.</p>

Global Comments

Writer	Comment
Gail Miller, Citizens Oversight Committee	<p>Global Comment: Using the word “shall” throughout the Implementing Guidelines document creates strict, enforceable, obligations that agencies may not realistically be able to meet due to limited resources, staffing, funding, or timelines. It leaves no room for professional judgement, unexpected conditions, or operational constraints. Agencies need to be allowed to have flexibility. The word “should” will allow agencies practical decision making while still encouraging compliance. The word “should” needs to replace the word “shall” throughout the document.</p> <p>Metrics Comment: Although the Metrics in the document were developed with good intentions, they were created by individuals who are not technical experts in the transportation field. As a result, some of the requirements may not reflect real-world operational constraints or practical realities faced by agencies. Because agencies possess the knowledge and technical expertise necessary to understand what is feasible, it is essential we rely on their informed judgement. Incorporating their comments will ensure that the metrics are not only attainable but also fair, and aligned with actual program conditions.</p> <p>Again, I strongly urge the steering committee to consider agency expertise comments and incorporate those that would otherwise create an undue burden on the agency and threaten their funding unnecessarily. For example, metrics as those demanding a certain number of improved miles of bike lanes/path, and trails in the Existing Neighborhood Streets and Roads Repair and Maintenance section maybe unrealistic and not attainable. As the Mayor of Reedley, Nicole Zieba stated, the City may choose not to accept Measure C funds as a result of metrics they are not able to achieve.</p>