November 29, 2017

Ike Njoku
Department of Community Development & Sustainability
City of Davis
23 Russell Blvd.
Davis, CA 95616

RE: Plaza 2555 Apartment project consistency with the 2016 Metropolitan Transportation Plan/Sustainable Communities Strategy

Dear Mr. Njoku,

You requested SACOG’s confirmation that the Plaza 2555 Apartment project is consistent with the 2016 Metropolitan Transportation Plan/Sustainable Communities Strategy (MTP/SCS). SACOG provides a consistency determination at the request of the lead agency. However, it is the responsibility of the lead agency to make the final determination on a project’s consistency with the MTP/SCS. Per your request, we have reviewed the project information you provided and compared it to the MTP/SCS assumptions for the project area to make our determination. We used our SCS Consistency Worksheet to assist in this analysis and are attaching that worksheet for your reference. We find the Plaza 2555 Apartment project, as defined in the attached worksheet, consistent with the 2016 MTP/SCS.

The Plaza 2555 Apartment project is located on 6.5 acres located at 2555 Research Drive in Davis. The project, as defined in the materials you provided, consists of up to 200 apartment units. The residential density of the project is approximately 30.77 dwelling units per acre and 94 percent of the total building square footage (278,796 sf of the 295,414 sf).

The Plaza 2555 Apartment project, is an infill project within the Established Community designation of the MTP/SCS for the City of Davis (see attached Map 2). Within the Established Community, the MTP/SCS forecasts a range of low to high density residential, commercial, office, and industrial uses (MTP/SCS Appendix E-3, Land Use Forecast Background Documentation, pp. 148, February 19, 2016). The project’s land uses fall within this range of general uses, densities, and building intensities. Therefore, development at the proposed densities is consistent with the build out assumptions for the area within this community type of the MTP/SCS.

With respect to consistency with the MTP/SCS policies, the applicable policies are embedded in the metrics and growth forecast assumptions of the MTP/SCS. For the purposes of determining SCS consistency, projects consistent with the growth forecast assumptions of the MTP/SCS are consistent with these policies. The MTP/SCS housing forecast for the Established Communities was based not only on the City’s land use plans and policies, but also on the following: an assessment of past building activity, current project entitlement activity, and consideration of changing demographic and housing market demand. Infill development and redevelopment is a strategy essential to the success of the Blueprint Preferred Scenario and the MTP/SCS. The Blueprint Preferred Scenario, the adopted MTP/SCS, and the draft MTP/SCS achieve transportation, air quality, and other quality of life benefits by relying in part on infill and redevelopment projects such as this one. The proposed Plaza 2555 Apartment project is consistent with MTP/SCS growth forecast assumptions. Our confirmation of the project’s consistency with the MTP/SCS is not intended to express any opinion on the site design or the appropriate conditions of approval of the project.
The project is also located within a Transit Priority Area. Transit Priority Areas are areas of the region within one-half mile of a major transit stop (existing or planned light rail, street car, train station, or the intersection of two or more major bus routes) or an existing or planned high-quality transit corridor included in the MTP/SCS. These are the areas that meet the transit requirements of a Transit Priority Project in SB 375. As shown in Map 1, the project is directly adjacent to the Cowell Boulevard high quality transit corridor. It is also within a half mile of another high-quality transit corridor, Pole Line Road, which intersects the Cowell Blvd corridor less than a half mile south of the project site. The Plaza 2555 project qualifies as a Transit Priority Project because it is greater than fifty percent residential, has a minimum net density of 20 units per acre, is located within a half-mile of high-quality transit in the MTP/SCS, and is consistent with the land use, density, intensity and applicable policies of the MTP/SCS. Additionally, if the City determines that the project meets all the requirements of a Sustainable Communities Project as described in PRC § 21155.1, the project could be exempt from CEQA under SB 375.

You also asked that SACOG identify the streets surrounding the project site that are part of the regional transportation network. As defined in PRC § 21159.28(c), "Regional transportation network" means "all existing and proposed transportation system improvements, including the state transportation system, that were included in the transportation and air quality conformity modeling, including congestion modeling, for the final regional transportation plan adopted by the metropolitan planning organization, but shall not include local streets and roads." The project site is located near Cowell Blvd, Pole Line Road, and Interstate 80. These roadways are part of the regional transportation network as shown on the attached Map 3.

Thank you for inviting SACOG's input as to the consistency of the Plaza 2555 Apartment project with the MTP/SCS for 2036. If you have further questions or need further assistance, please don't hesitate to contact me at (916) 340-6265.

Sincerely,

Kacey Lyon
Planning Manager
DETERMINATION OF MTP/SCS CONSISTENCY WORKSHEET
For Qualifying Transit Priority Projects and Residential/Mixed-Use Residential Projects
As of October 4, 2016

Background: Pursuant to SB 375, streamlined CEQA review and analysis is available to Transit Priority Projects (TPPs) and residential or mixed-use residential projects that are consistent with the SCS. The SCS was adopted by the Sacramento Area Council of Governments (SACOG) Board as part of the 2016 Metropolitan Transportation Plan/Sustainable Communities Strategy on February 18, 2016. The California Air Resources Board (CARB) provided an Acceptance of GHG Quantification Determination for the SACOG SCS in September 2016.

Streamlined CEQA review available to TPPs consists of one of the following: 1) a Sustainable Communities Environmental Assessment (SCEA) pursuant to Public Resources Code (PRC) § 21155.2(b) or 2) an EIR pursuant to PRC § 21155.2(c).b

Streamlined CEQA review available to residential or mixed-use residential projects consists of an EIR pursuant to PRC § 21159.28(a).

Purpose: The purpose of this worksheet is to provide lead agencies with assistance on three issues:
1. Whether a proposed project qualifies as a TPP;
2. Whether a proposed project qualifies as a residential or mixed-use residential project (at least 75 percent of the total building square footage is residential);
3. Whether the TPP or residential/mixed-use residential project is consistent with the general land use designation, density, intensity and applicable policies of the 2016 MTP/SCS adopted by the Sacramento Area Council of Governments (SACOG).

The lead agency has responsibility to make the final determination on these matters and to determine the applicable and appropriate CEQA streamlining, if any.

Directions: This worksheet should be completed by the lead agency, relying on the project description of the proposed project, MTP/SCS Chapters 3 and 4, and MTP/SCS Appendix E-3. Regardless of whether this worksheet is used, pursuant to PRC § 21155(a) and PRC § 21159.28(a), a project can only be consistent with the MTP/SCS if it is consistent with the general land use designation, density, building intensity, and applicable policies specified for the project area in the adopted SCS. This worksheet only applies to the 2016 MTP/SCS (adopted February 18, 2016); subsequent MTP/SCS adoptions may require updates to this form.

Lead agencies are welcome to contact SACOG for assistance in completing this worksheet. For assistance, contact Kacey Lizon at klizon@sacog.org or 916-340-6265.

Project Title: _______________ Plaza 2555

Proposed project is located in (city/county name): _______________ Davis
DETERMINATION OF MTP/SCS CONSISTENCY WORKSHEET
As of October 7, 2013

1. Transit Priority Project Designation (PRC § 21155(b))

A project must meet the requirements of items 1.A, 1.B, 1.C, and 1.D, below, to qualify as a Transit Priority Project. For items 1.C and 1.D, the definition of an MTP/SCS Transit Priority Area is: the area within one-half mile of a rail station stop or a high-quality transit corridor included in the MTP/SCS. A high-quality transit corridor has fixed route bus service with service intervals of 15 minutes or less during peak commute hours. See MTP/SCS Chapter 3 for the map of Transit Priority Areas.

1.A. [x] The Project has a minimum net density\(^{2}\) of 20 dwelling units per acre.

Calculation:

\[
\text{Total housing units proposed in Project} \div \text{Total Project parcel area (in net\(^{2}\) acres)} = \frac{200}{6.5} = 30.77 \quad \text{(Should be \geq 20 du/ac)}
\]

1.B. [x] At least 50 percent of the Project’s total building square footage is in residential use, AND,

[x] The total building square footage of the Project has 25 percent or less non-residential use, or, if it has between 25 and 50 percent in non-residential use, has a minimum FAR of 0.75.

Calculations:

\[
\text{Total Project residential square footage} \div \text{Total Project building square footage} = \frac{278,796}{295,414} = 94\% \quad \text{(Should be \geq 50\%)}
\]

Total Project building square footage \div Total Project parcel(s) area square footage \quad \text{(Should be \geq 0.75)}

1.C. [x] The Project is located within an MTP/SCS Transit Priority Area and the qualifying transit service is (transit route name/applicable street name/number or light rail stop name as identified in the adopted MTP/SCS): _____ high-quality transit on Cowell Blvd and Pole Line Road

1.D. [x] No more than 25 percent of the area of the Project parcels are farther than one-half mile from the TPA transit stop/corridor and no more than 10 percent of the residential units or 100 units, whichever is less, in the project are farther than one-half mile from the TPA transit stop/corridor.
DETERMINATION OF MTP/SCS CONSISTENCY WORKSHEET  
As of October 7, 2013

Calculations:

Project area outside of ½ mile TPA \( \frac{0}{\text{Total Project area } 6.5 \text{ acres}} \)  
= \( \frac{0}{\text{Should be } \leq 25\%} \)

Project residential units outside of ½ mile TPA \( \frac{200}{\text{Total Project units } 0} \)  
= \( \frac{0}{\text{Should be } \leq 10\% \text{ or less than } 100 \text{ units}} \)

SECTION 1 CONCLUSION:


[ ] The proposed project does not meet all the requirements of 1.A, 1.B, 1.C, and 1.D and therefore does not qualify as a Transit Priority Project.

2. Residential or Mixed-Use Residential Project Designation for Projects Located Outside of an MTP/SCS TPA 21159.28(a)

A residential or mixed-use residential project using the streamlined CEQA review to complete an EIR pursuant to PRC § 21159.28(a) must meet the following requirement:

2.A. [✓] At least 75 percent of the total building square footage of the project consists of residential use.

Calculation:

\[
\frac{278,296}{295,414} = 94\% \quad \text{(Should be } \geq 75\%)\]

SECTION 2 CONCLUSION:

[✓] The proposed project meets the requirements of 2.A and therefore qualifies as a residential or mixed-use residential project.

[ ] The proposed project does not meet the requirements of 2.A and therefore does not qualify as a residential or mixed-use residential project.

IF A PROJECT DOES NOT QUALIFY AS EITHER A TRANSIT PRIORITY PROJECT (UNDER SECTION 1) OR A RESIDENTIAL OR MIXED-USE RESIDENTIAL PROJECT (UNDER SECTION...
2), THE PROJECT DOES NOT QUALIFY FOR SB 375 CEQA STREAMLINING. DO NOT PROCEED TO SECTION 3.

3. Required Consistency with the SCS: General Use Designation, Density and Intensity, and Applicable MTP/SCS Policies (PRC § 21155(a) and PRC § 21159.28(a))

3.A. Applicable MTP/SCS Policies. For the purposes of determining SCS consistency, the policies of the MTP/SCS are embedded in the metrics and growth forecast assumptions of the MTP/SCS. Projects consistent with the growth forecast assumptions of the MTP/SCS, as determined by application of items 3.B. and 3.C, are consistent with the MTP/SCS and its policies.

3.B. Applicable Community Type. The MTP/SCS land use forecast is illustrated using Community Types. In order to determine the general use designation, density and intensity of the Project area within the MTP/SCS, the Project must be located within a Community Type designated in the MTP/SCS. The MTP/SCS defines density/building intensity in terms of the amount of growth (residential and non-residential) forecasted and the amount of build out potential within each Community Type area. SACOG monitors development activity on an annual basis to check that the amount of development is consistent with the growth forecast of the MTP/SCS.

For the purposes of the lead agency’s determination of SCS consistency, use MTP/SCS Appendix E-3 to identify the Community Type for the Project and fill in the applicable information, below for 3.B.1 and 3.B.2.

3.B.1. The Project is located in the following Community Type:

[ ] Center and Corridor Community

[ ] Established Community

[ ] Developing Community (list the specific name of the Developing Community as identified in the jurisdiction narrative in Appendix E-3): ____________________________

[ ] Rural Residential Community

3.B.2 [x] Development from the project when added to other entitled projects will not exceed the MTP/SCS build out assumptions for the area within this Community Type, which is 1,922 new housing units and 3,354 new employees. 
3.C. General Use Designation, Density and Building Intensity. The foundation of the land use designations for the MTP/SCS is adopted and proposed local general plans, community plans, specific plans and other local policies and regulations. A project is consistent with the MTP/SCS if its uses are identified in the applicable MTP/SCS Community Type and its uses meet the general density and building intensity assumptions for the Community Type. The proposed project does not have to include all allowed uses in the MTP/SCS.

3.C.1. Determine consistency of the Project using one of the methods below:

Option A:
[ ] The Project is located in a Center and Corridor Community or an Established Community and the Project uses are consistent with the allowed uses of the applicable adopted local land use plan as it existed in 2012 and are at least 80 percent of the maximum allowed density or intensity of the allowed uses of the applicable local land use plans. Therefore, the Project is consistent with the MTP/SCS.

OR

Option B:
[ ] The Project is located in a Center and Corridor Community or an Established Community and the Project uses have been reviewed in the context of, and are found to be consistent with, the general land use, density, and intensity information provided for this Community Type in Appendix E-3 of the MTP/SCS. Therefore, the Project is consistent with the MTP/SCS.

OR

Option C:
[ ] The Project is located in a Rural Residential Community and the Project residential density does not exceed the maximum density of one unit per acre as specified in the MTP/SCS, and employment development in the Project is at least 80 percent of the maximum allowed density or intensity of the applicable local land use plans. Therefore, the Project is consistent with the MTP/SCS.

OR

Option D:
[ ] The Project is located in a Developing Community and the Project’s average net density meets or exceed the average net density described for this specific
DETERMINATION OF MTP/SCS CONSISTENCY WORKSHEET
As of October 7, 2013

Developing Community (as referenced by name of applicable specific plan, master plan, or special plan in MTP/SCS Appendix E-3) and employment development in the Project is consistent with the general employment land uses described for this specific Developing Community. Therefore, the Project is consistent with the MTP/SCS.

SECTION 3 CONCLUSION:
The proposed project is consistent with the General Use Designation, Density and Intensity, and Applicable MTP/SCS Policies for the following reasons (summarize findings on use designation, density and intensity for the Project evaluation completed in Section 3):

The Plaza 2555 project is an infill project within the Established Community designation of the MTP/SCS for the City of Davis. Within the Established Community, the MTP/SCS forecasts a range of low to high density residential, commercial, office, and industrial uses (MTP/SCS Appendix E-3, Land Use Forecast Background Documentation, pp. 148, February 19, 2016). The project’s land uses fall within this range of general uses, densities, and building intensities. Therefore, development at the proposed densities is consistent with the build out assumptions for the area within this community type of the MTP/SCS.

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1 This document may be updated as users provide feedback on its utility.
2 If a TPP complies with an additional series of requirements set forth in PRC § 21155.1, it qualifies as a Sustainable Communities Project and becomes eligible for a complete exemption from CEQA. This worksheet does not address Sustainable Communities Projects.
3 Net density is not defined in PRC §2115(b). In the MTP/SCS, net density is defined as follows: Housing units divided by the acres on which housing is built, exclusive of public rights-of-ways, parks, schools and public areas (MTP/SCS Appendix E-3).
4 The MTP/SCS build out for each Community Type assumes development that is entitled as of January 1, 2012. SACOG monitors housing permits on an annual basis and will ensure that housing and employment projects relying on the SB 375 CEQA benefits will not exceed the capacity assumed in the MTP/SCS. SACOG undertakes this review generally every four years as part of the update of the MTP/SCS.
5 The MTP/SCS general land use, density and intensity in Center and Corridor Communities and Established Communities is based on 80 percent of the maximum allowed density or intensity of the land use designations in applicable local land use plans as they existed in 2012, unless otherwise noted in Appendix E-3.
6 The MTP/SCS land use forecast in Developing Communities was modeled according to adopted and proposed specific plans, master plans, and special plans as they existed in 2012, and is based on the housing and employment totals and the average net density of these plans, as outlined in Appendix E-3.