Letter 75

Village Farms Draft EIR comments:

Overview: Village Farms is the largest project ever proposed in Davis for 1,800 units on almost 500 acres. The project has many problems primarily because the site is a handicapped site with a 200-acre flood plain, it is adjacent to the *unlined* Old City Landfill and Sewage Treatment Plant with a long history of leakage into the ground water of toxics and other chemical contaminants (now including PFAS "forever chemicals"), the enormous traffic issues already at Covell and Pole Line lack of bicycle/pedestrian safe access issues because it cannot be accessed from F St. due to the railroad tracks, Covell Blvd. cannot have a grade-separated crossing due to existing infrastructure, and the DEIR now is questioning the "feasibility" of a Pole Line undercrossing. In additional to all of these issues, there is also the high costs imposed by the enormous amount of infrastructure needed and the massive impacts on the native plants, wildlife and habitat in the area. It is also important to recognize that the project is *not* infill per our General Plan which defines infill as land that is within the City limits, but Village Farms is outside the City limits in Yolo County.

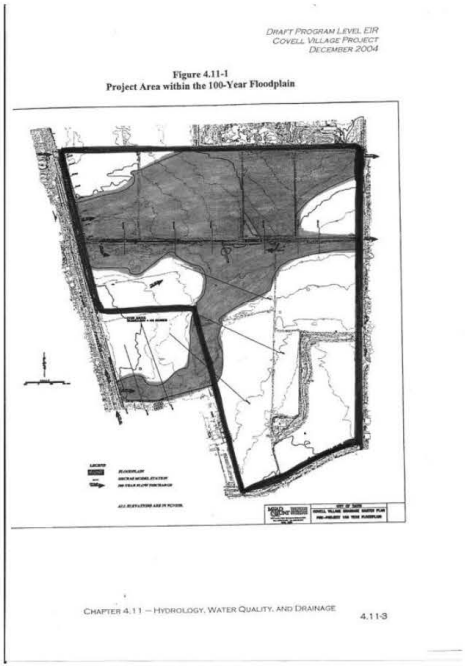
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The following are comments regarding issues and impacts not addressed adequately in the DEIR and other issues:

1) **200-acre Floodplain** - Village Farms has an enormous flood plain of over 200 acres on covering roughly half of the land to be developed which is a FEMA Zone A Flood Hazard flood plain. A fundamental principal of good planning is to NOT build on enormous flood plains like this, particularly to try to shoe-horn in 1,800 on the parcel. Trying to engineer away a flood plain which take up at least half of the land to be developed makes no sense. The last thing we need in Davis is for the City to experience the flooding Natomas has had because the planning failed to engineer control of flooding in the flood plain. (see graphic below, Covell Village DEIR)

75-2

This project exposes the City to financial risk due to the flooding potential. It is noteworthy that per California's legislation the State will no longer financially bail out cities foolish enough to build on enormous flood plains like this. Wildhorse currently has had flooding issues due to climate change which can only get worse if the Village Farms project tried to re-route the enormous amount of water that 400 acres of ag land is soaking up currently.



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2) **The DEIR does not have a detailed stormwater and flood control plan and analysis for the BRPA. The DEIR wants to put this off until the tentative map of the project if the project were approved. Seriously? It is astonishing that this DEIR would try to kick-the-can down the road on explaining how this project plans to**

75-3 **try to control the massive amount of water that over 400 acres of ag land is currently soaking up. This needs to be added to the DEIR particularly since there project site already has enough flood control issues including the 200-acre flood plain. It is inexcusable that the DEIR is deficient in this critical information on how the Village Farm plans to not flood, and well as not flood surrounding areas. This DEIR was clearly rushed to accommodate the developers wished to get to a Measure J/D/R ballot quickly. The outcome of that is that the Covell Village DEIR has an incredible number of deficiencies and is seriously inadequate.**

75-4 **Further, it appears that the Proposed Project was going to use the UATA dig pit as a defacto detention basin when extreme rain storms occurred, which would feed into Channel A. This is where the arsenic soil is present , which is NOT "background" level arsenic since it is 56X – 73X higher them what residential should be. Yet, the Urban Development areas immediately adjacent have NO detectable arsenic in the soil. So, there is no basis for trying to excuse the high levels of arsenic, far above MCL's, to be "background". The** high arsenic levels were clearly introduced via arsenic containing pesticides, herbicides and fertilizer since the high arsenic levels go 9' down from the surface as the DEIR explained was samples that deep and the surface soil. **The question is, is the BRPA also planning to use the UATA as a defacto detention basin also in extreme weather situation? It is not made clear in the DEIR. But assuming it is the same as the Proposed Project .**

75-5 **If so, that means tht the high arsenic level soil would be washed into Channel A contaminating it and potentially poisoning wildlife, native plants, trees and bushes. It would then go through Wildhorse exposing those residents and pets and wildlife as well as native plant, trees, and shrubs. As it would go eat into Willow slough shallow groundwater and to the wetlands and its habitat and to other waterways. flow going through the Wildhorse neighbors. This situation of the exposure and spread of the arsenic contamination into our runoff and into Channel A with these high arsenic levels is unacceptable.**

This issue is *not* mentioned in mitigation 4.8-1 because that section talks about the cause of polluting the channel from runoff would be primarily from construction causes. There is no mention of the UATA high arsenic level soil being washed into the channel, which would be plumbed via a connection from the UATA crater like dig-pit. This dig pit would result from excavating one million cubic yards of soil to try to fill the flood plain, to then build housing on.

75-6 **The concept of using high arsenic soil to build housing upon is a health, welfare and safety issue to residents and also a serious potential liability situation to the City. Again, the UATA high arsenic content soil *cannot* be "background", since the soil on the *directly adjacent* Village Farms Urban Development Area (UDA) soil tested had no detectable levels of arsenic. If the UATA high arsenic soil were truly "background" it would be present in the UDA there also. So, the UATA high arsenic soil *had* to be from applied herbicides, pesticides or fertilizers, maybe some from the adjacent Old City Landfill and Sewage Treatment Plant since the high arsenic levels were detected as far 9 feet down with the soil borings tested.**

75-7 3) **The Project Description section on page 3-2 incorrectly states that the flow of Channel a runoff goes east to west. That is backwards, since the direction of the Channel runoff runs west to east. This needs to be corrected here and elsewhere in the DEIR**

75-8 4) **The design of re-routing of the channel would allow overflow to run onto Pole Line Rd. in extreme storm conditions. These extreme storm events are likely to happen more often due to climate change**. This makes

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no sense since this would back up the already massive amount of traffic trying to enter and leave Davis on Pole Line Rd. Traffic and flooding damage to cars would result. Planning to allow the flooding of a busy access road to the City is actually the *absence* of planning, This Channel design needs to be redesigned to prevent this from happening. This is not acceptable.

5) **Traffic impacts which would be incredibly worse than it is now from adding 1,800 more housing units at Covell Blvd. and Pole Line Road** which is already incredibly impacted. Shoe-horning in 1,800 units on this Village Farms site will only cause a more massive number of backed-up idling cars, which in turn will increase greenhouse gases and air pollution form car exhaust fumes and particulate matter. The air pollution in turn will deteriorate air quality and potentially have health impacts. The location of the Oak Heritage Park at Covell Blvd. And Pole Line Rd. would, in particular expose young children and adults recreating will be breathing more heavily from exercising and taking in more this polluted air. So, this then becomes a health issue as well an impact on our climate from the deteriorated air quality increased greenhouse gases (GHG's). and the All of these impacts are CEQA issues but the DEIR is dismissive of these issues.

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The theory that you would have lower VMT's if you cram in much more housing is illogical because for one thing any reduction in car trips and vehicle miles travels would rely on having a robust public transit system that people actually used significantly. However, the City has no plan to significantly improve its currently minimal, inconvenient and inadequate public transit system which is designed primarily to serve UCD's needs. Creating higher densities without the infrastructure of a robust transit system would only impact the environment far more due to more backed-up traffic and its environmental and health impacts. The DEIR is inadequate because it is not accurately factoring in the minimal public transit system that Davis has, and that it has no plans to significantly expand to the robust level of a system that would be needed to try to offset the traffic impacts in order to lower VMTs.

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Beyond this, you cannot assume people will use even a robust public transit system particularly for young families with kids that need to be transported by their parents to school usually and their other activities. If Davis wanted to lower its VMT numbers it should start by getting a school bus system in town instead of hundreds of parents driving their kids to and from school daily.

The DEIR admits that the air quality would deteriorate with the Biological Resources Preservation Alternative (BRPA) . This is clearly due to cramming in 1,800 housing units, which in turned, would generate a massive amount of car traffic that will be backed up along Covell Blvd. and Pole Line Road. The resulting huge volume of fumes and particulate matter from care exhaust emissions would degrade air quality and cause health impacts as well as increase greenhouse gases.

Conclusion from Air Quality, GHG emissions, and Energy Chapter:

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"Based on the above, operation of the Proposed Project and the BRPA could violate an air quality standard or contribute substantially to an existing or projected air quality violation. Therefore, the Proposed Project and BRPA would be considered to result in a significant impact related to air quality.

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The DEIR also admits to air quality deterioration as well as greenhouse gases increasing as a result of the Village Farms project as being significant and unavoidable so the VMT application is not helping but actually causing the project to have more impacts with shoehorning in too many units (1,800) into the project.

The mitigations to try to make this massive traffic "a less than significant impact" are ridiculous.

75-13

6) The TIS study (Appendix R) admits that even with the mitigation measures suggested that VMT will not be reduced significantly enough to make a difference (i.e. 15% below or more below the baseline local or regional residential VMT

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per capita averages) **and the VMT impacts will still be significant and unavoidable for the Proposed Project or the BRPA.**

Also, the DEIR state that the number of car trips from the Proposed Project with 1,800 housing units is 13,885 and interestingly, for the BRPA also with 1,800 housing units, the number of car trips is more at 15,415.

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Therefore, it is clear that shoehoming in more units onto a smaller piece of land is *not* helping reduce VMT, , but quite the contrary it creates more VMT's.

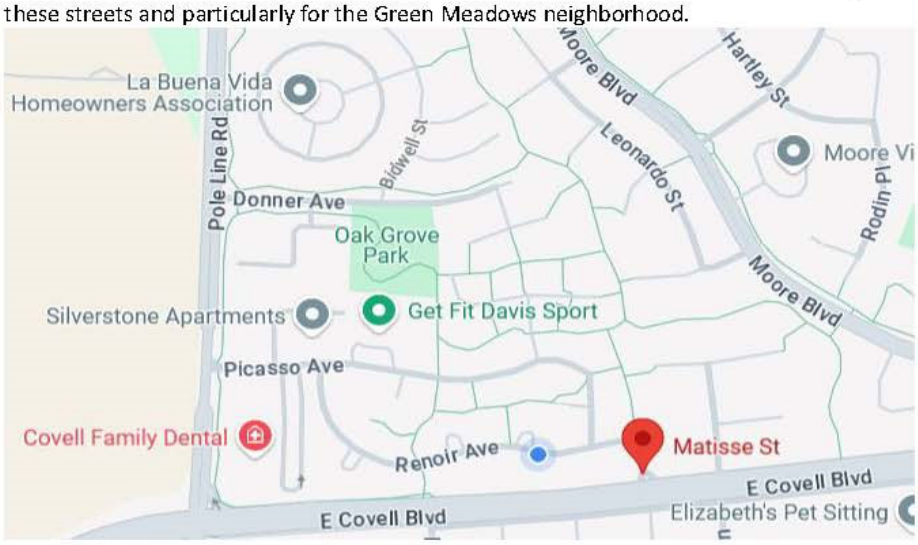
So, cramming 1,800 housing units into the smaller BRPA acreage is *not* helping, but is counter-productive to reducing VMT. There it would appear that reducing eh number of housing units would help reduce the VMT impacts as well.

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This makes clear that the best solution is a reduced footprint alternative similar (covered in point #18) the Covell Village Reduced Acreage Environmentally Superior Alternative needs to be added to DEIR to be analyzed with the modifications of a) protecting the vernal pools and b) reducing the number of housing units to 900-1,000 units or less.

7) **Picasso, Renoir and Matisse would become a thru-way short-cut with massive traffic impacting the safety of the neighborhood.** There is no mitigation measure even attempted for the massive amount of traffic that would cut through the Green Meadows neighborhood on Matisse St. , Renoir Ave, and Picasso Ave. as well as Moore Ave. of cars going between Covell Blvd. and Pole Line road to try to avoid the Covell and Pole Line Road intersections. These streets are narrow and curved and only have one side of the street parking. There is speeding of cars cutting through currently doing this and the massive increase in this cut-through traffic would make it dangerous conditions for this neighborhood. (see graphic below of Matisse St., Renoir Ave, and Picasso Ave. connecting Covell Blvd. with Pole Line Road). There needs to be mitigation measures for these streets and particularly for the Green Meadows neighborhood.

75-15



8) **Serious lack of bicycle/pedestrian safe access issues.** There is no connectivity because the project cannot get a grade -separated crossing at F St . since the Railroad won't permit it. There is no way to provide a grade-separated crossing over or under Covell Blvd. due to existing infrastructure Further, the DEIR states that is uncertain if a Pole Line Rd. undercrossing is *feasible*. **This is a significant inadequacy of the DEIR.** Why does the DEIR not know yet if a Pole Line Rd. undercrossing is feasible or not? When will they know if a Pole Line Rd. undercrossing is feasible? Are they waiting until after the ballot to announce that it is not feasible, or that they still aren't sure if it is feasible? The DEIR is seriously inadequate by trying to side-step this critical infrastructure question. The EIR process has been rushed and is deficient on providing many important

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details like this which is inexcusable. The developer needs to get these answers and come back when the DEIR has an answer to this infrastructure issue and provides other absent details in the document

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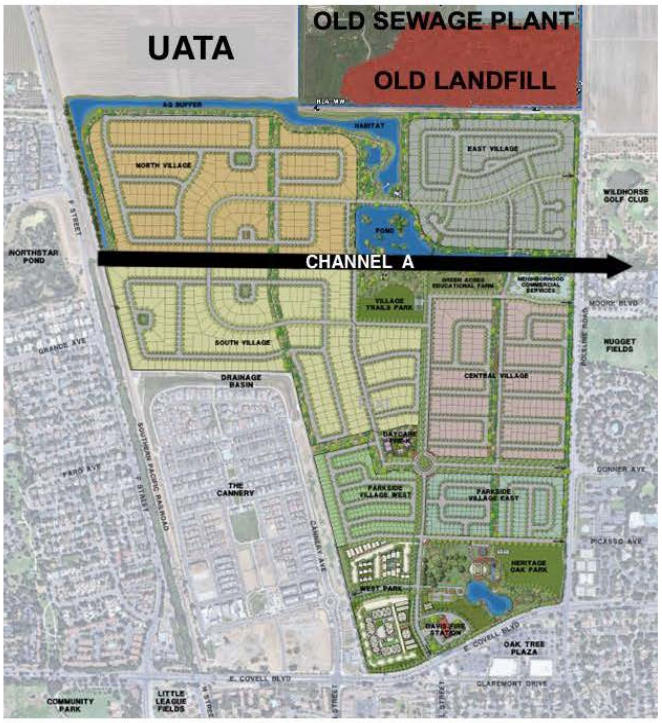
a) **The Pole Line Rd. undercrossing must be part of the project because it is essential for safe bicycle and pedestrian crossing, particular for the children which would have to cross Covell Blvd. and Pole Line Rd. to get from the Village Farms Project to any school in Davis**
b) **The Pole Line Rd. Undercrossing must be a baseline project feature in the Measure J/R/D vote.**
c) **Another issue is that developer must agree to cover the entire cost of the undercrossing if it is feasible, since it is *his* project driving the need for it. Davis residents should not be expected to be paying for the Village Farms infrastructure needs.**

75-17

9) **Toxics from the immediately adjacent Old City Landfill and Sewage Treatment Plant** – Landfills are now required to have huge "exclusionary zones" as a perimeter where not urban development is permitted for health, welfare and safety reasons. Often a mile or more around a landfill likewise old landfills also need to have an exclusionary zone. **A minimum of 1,000-foot buffer zones are often required of old landfills. The City can and needs to require at least a 1,000-foot buffer zone around this *unlined* Old City landfill for the health, welfare and safety of the community.**

PFAS "forever chemicals" which are carcinogenic and manganese have been monitored recently exceeding screening maximum concentration levels (MCL's) in the groundwater of the Village Farms project and the Old City Landfill. Failure to do have at least a 1,000-foot buffer would be irresponsible and expose the City to legal liability in the future due to the potential health, welfare and safety impacts on the community. The DEIR is dismissive of these toxics including PFAS's which are carcinogenic could cause serious health issues. The DEIR is inadequate regarding these serious toxics and chemical contaminants. (see graphic below)

75-18



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10) **The DEIR fails to include the relevant information that the UES groundwater monitoring study done in April 2024 which states that because the groundwater direction has changed over the years, continued studies need to be done to determine which direction the groundwater is going since currently it is undetermined (Appendix O page 10).**

Furthermore, it fails to point out that the UES study recommendations including additional monitoring studies to get updates on the PFAS and manganese levels which exceed MCL's and to determine the direction of the plume. This information needs to be added to the DEIR.

But then, the DEIR in pages 4.7-33-34 the DEIR appears to be setting the stage to try to abandon the gas and water monitoring wells. However, the UES April 2024 groundwater studies made the recommendations that continued monitoring of the PFAS's and manganese and other chemical contaminants exceeding MCL's needs to be continued. This is to track the levels of the toxics and other chemical contaminants exceeding MCL's for any changes and because the plume direction needs to be determined since these chemical contaminants do migrate. Also, the direction of the groundwater has change over the years due to various factors so the flow direction of the groundwater also needs to be determined per the UES recommendations. Per the UES April 19, 2024 Report Recommendations:

75-19

"To understand the potential migration of the PFAS plume and evaluate any future impact to local water sources that are discovered, the Old Davis Landfill should continue to be monitored for any changes in the amount of contamination present.

Based on the above information, continued monitoring of manganese and PFAS to determine source of higher concentration and movement of contaminants in the aquifer are recommended."

While the DEIR mentions exploring the possibility of abandoning the monitoring wells but it does not analyze how any well closures would impact the ability to detect future groundwater contamination. CEQA requires disclosure of foreseeable environmental risks (§15126.2)

The bottom line is, it is clear that the monitoring wells must not be abandoned and need to be used to continued monitoring long-term for the health, welfare and safety of the public.

However, raises the question, who will pay for these monitoring studies that will need to be done regularly into the future? Is the developer expecting the City to pay for these studies to impose these costs on Davis residents? These costs need to be paid for by the developer long-term. Not the City and Davis residents

11) **It is notable that the Yolo County Department of Environmental Health Village Farms NOP comment letter states that monitoring wells may need to be installed on the Old City Landfill for methane gas monitoring** for health and safety reasons due to Village Farms residential. Who will pay for the installation of the methane monitoring wells and who will pay for the long-term monitoring for health, welfare and safety reasons due to the Village Farms residential project.

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Yet, again, the DEIR in pages 4.7-33-34 the DEIR is setting the stage to try to abandon the gas and water monitoring wells. However, the the UES April 2024 groundwater studies made clear that continued monitoring of the PFAS's and manganese and other chemical contaminants exceeding MCL's needs to be continued. This is because the size and direction of the plume has not been determined. Also, the direction of the groundwater has change over the years due to various factors so the flow direction of the groundwater also needs to be determined.

75-20 Cont.

While the DEIR mentions exploring the possibility of abandoning the monitoring wells but it does not analyze how any well closures would impact the ability to detect future groundwater contamination. CEQA requires disclosure of foreseeable environmental risks (§15126.2)

The bottom line is, it is clear that the monitoring wells must not be abandoned and need to be used to continued monitoring long-term for the health, welfare and safety of the public.

Again, this raised the question of who would pay for the installation of these monitoring wells and the long-term monitoring? The City? The County? All costs need to be covered short-term and long-term by the developer short term and long-term monitoring will induce cost for the City long-term.

75-21

12) **The DEIR does not address this question: What if methane gas levels rise in the Landfill where there are homes build close to it? City liability?**

From the December 8, 3034 Yolo County Environmental Safety Division:

"The Old Davis Landfill may need to install monitoring wells as a protection measure for landfill gas migration because of the proposed residential development on the adjacent project parcel within 1,000 feet of the landfill footprint, The prescriptive methane compliance standard at the landfill property boundary is 5% by volume in air, however, a lower standard of methane applies to occupied structures. The landfill may have to implement corrective actions oat lower monitoring readings than 5% at the property boundary should the levels be a significant threat to the nearby development."

"The waste cell boundaries may need to be delineated to determine gas monitoring well placement. This delineation may require additional Phase II investigation which may include trenching or bore hole excavation."

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13) **Potential mixing of groundwater with Channel A runoff risks**. This serious problem can very well result because the area has an enormous flood plain which is a **FEMA Zone A Special Flood Hazard Area,** Furthermore, climate change is bringing more extreme storm events and also less ground water is being drawn since the City has been using surface water. Also, fewer City wells are used at this point for various reasons including some shutdown due to high chromium levels. As a result, ground water levels have been higher at times in some areas including in this Village Farms area (see table 4.8-3 pg. 4.8-8) increasing the risk of the groundwater mixing with the channel water. These factors added the presence of the huge 200-acre flood plain creates even more flooding potential for this area combined with climate change events increasing with more frequency.

The problem that potentially can result that the Channel A water mixed with this contaminated groundwater including high levels of PFAS "forever chemicals" (which are carcinogenic) manganese, aluminum, arsenic, and nitrates would flow to the east though Wildhorse exposing those neighbors and the wildlife and habitat and continuing to the east to the wetlands. PFAS are long-lived chemicals that accumulate and magnify up the food chain impacting wildlife. The outcome would be contamination of the wetlands polluting the water and destroying the habitat. This would be catastrophic .

The DEIR acknowledges this issue, therefore the risk of this groundwater contamination of the channel runoff potentially occurring:

"In an effort to ensure that contaminated groundwater associated with the Old Davis Landfill does not enter the proposed storm water system for the Proposed Project/BRPA, Geocon prepared a Channel Evaluation Report to assess the depth

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to which contaminated groundwater could be encountered on-site during excavation of the drainage system, including channel and detention basin. As previously discussed, and shown in Figure 4.8-3, the substantial majority of groundwater elevation data points are below 26.5 feet amsl. Thus, the Drainage Channel Evaluation prepared for the Proposed Project/BRPA by Geocon recommended the proposed drainage channel be designed with a base elevation above the groundwater elevation (i.e., 26.5 feet amsl) to limit the infiltration of groundwater into the channel that may be impacted by PFAS or manganese".

14) **Soil contaminants present exposure risks to residents and potential liability to the City** **The EIR is also deficient and dismissive regarding the soil toxics and chemical contaminants in the soil, particularly those above maximum concentration levels (MCL's). The developer plans to use the Urban Ag Transition Area (UATA) soil as a dig pit to try to fill in the 200-acre flood plain. The DEIR estimates moving at least ONE MILLION CUBIC YARDS of the UATA soil to fill in the flood plain.** However, this UATA soil contains high in arsenic for residential soil exceeding maximum concentration levels. The UATA soil tested revealed that the **arsenic levels range between 6.1 – 8 mg/kg, but should not be more than 0.11 mg/kg for residential soil. This means the arsenic lever of this dig pit soil being used to fill the flood plain that will have residential housing built on it would be 56X – 73X higher than should be in residential soil.** This is yet another health, welfare and safety issue and could potentially expose the City to liability later on.

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The DEIR incorrectly claims that these high levels of arsenic in the UATA soil is "background" arsenic. However, the Village Farms Urban Development Area for residential development located immediately adjacent *to* the south of the UATA parcel, has *undetectable* levels of arsenic. If the UATA high arsenic soil levels were truly "background, " it would also be present in high levels in both locations of these adjacent parcels. Instead, every single UATA soil sample tested contained, while every single sample tested from the adjacent Village Farms land planned for residential development had *undetectable* levels of arsenic. These results strongly suggest that this arsenic is *not* naturally occurring but much more likely the result of human application of arsenic-containing chemicals such as some pesticides, herbicides or fertilizers.

The critical issue is that the developers want to move a massive volume of this high arsenic level UATA soil to try to raise the level of the flood plain, which housing would be built upon. This raised potential health, welfare and safety issues for the residents of homes built on this high arsenic level contaminated soil. The proper authority which should have been brought is DTSC since it is their jurisdiction to handle this situation. This is required due to the extremely high level of arsenic contamination in the UATA soil and determining if this contaminated soil could even be used to fill the enormous flood plain and then then if it as allowable to have homes built on this contaminated soil.

Yet, the DEIR tries to claim that these hazard's exposures are insignificant:

"4.7-2 Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the likely release of hazardous materials into the environment. Based on the analysis below and with implementation of mitigation, the impact is less than significant."

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Further, all of this earth moving of this arsenic contaminated soil would be occurring within a one-quarter mile of the Montessori Pre-Kindergarten School at Renoir Ave. which is very close to Pole Line Road and Covell Blvd. , and the Birch Land Elementary School at 1600 Birch Lane, the Montessori School at 1811 Renoir Ave. and the educational Farm facility in the Cannery immediately adjacent to Village Farms.

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The DEIR dismisses the soil dust and potential spillage of the high-level arsenic soil which would be moved by an enormous number of dump trucks. Exposure to these neighborhoods' residents east of Pole Line Rd. from Covell Blvd. going north where these tucks would be travels is also a concern.

"4.7-3 Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school. Based on the analysis below, the impact would be less than significant."

75-24 Cont.

The Village Farms DEIR is dismissing the risks of exposure of soil containing high levels of arsenic contamination from the massive construction and earth moving to the 3 schools within a .25 mile of three school sites. This includes the Montessori pre-school, Birch Lane Elementary School and the Cannery farm education school which is immediately adjacent (west) to the Village Farm project. How can the DEIR claim that movement of this soil with high levels of toxaphene and lead would be insignificant which will result with soil dust and spillage from the trucks and exposure to children at three schools and residents of the nearby neighborhoods, particularly those along Pole Line Rd.?

Due to the extremely high concentration of arsenic contamination in the soil, the site requires mandatory DTSC oversight.

A serious inadequacy in the DEIR is that the proper authority should have been brought in, the Department of Toxics Substances Control (DTSC), because of the level of this contamination and the enormous volume of soil being moved which is an issue properly their jurisdiction.

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So, the following actions are needed by the City:

- **A) The City needs to request DTSC jurisdictional determination.**
- **B) The City needs to ask DTSC to conduct a Preliminary Endangerment Assessment.**
- **C) When the contamination is confirmed, a Remedial Investigation/Feasibility Study is required under DTSA oversite.**
- **D) Then, the DEIR needs to be revised and recirculated to reflect DTSC's findings and necessary mitigation measures.**

The City cannot approve the Village Farms project without fully addressing the contamination risk. Failing to do so would violate CEQA's disclosure requirements and puts future residents at risk.

75-26

15) **The UATA must not be annexed into the City.** There is no need to annex it into the City even if it is used as a dig pit. This UATA soil has high arsenic contamination which may be cause for liability to the City. Furthermore, annexation of the UATA would leave it vulnerable to being developed later if the developer decides to fill in the dig pit hole.

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This UATA dig pit site must not be permitted to be filled in later on and developed into housing or other urban uses, particularly due to the high arsenic levels and its proximity directly adjacent to the unlined Old City Landfill and Sewage Treatment Plant. **The Measure J/R/D baseline project features mist include this condition if the UATA is annexed to the City.**

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However, the City should not annex any of the Village Farms land above Channel A (including the UATA) but only have an easement on the north side of Channel A. Any consideration of development should be prohibited in the baseline project features, or must, at the very least, be subject to an additional Measure J/R/D vote just like the General Plan Urban Reserve land use designation.

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16) **UATA dig pit site cannot be used for ag mitigation credit.** It is rather odd to refer to this dig pit area is being defined as an Urban Ag Transition Area (UATA) since there is nothing agricultural about it if it is being use as a dig pit. If the developer anticipates asking for ag mitigation land for this crater-sized hole in the ground, the City need to be clear that there is *no* way that ag mitigation credit would be given for this.

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This crater-sized 10' deep hole would essentially become a defacto water detention basin where runoff for the adjacent unlined landfill would collect into the dig pit hole and soak down into the ground water producing a continuous feed of contamination into the groundwater. This groundwater communicates with the rest of the Village Farms groundwater that will make its way to potentially communicate with channel water. This potentially contaminated groundwater circulates and can make its way to mix with channel runoff. This potentially contaminated channel runoff would then run through Wildhorse , exposing those residents and wildlife, and out to the wetlands eventually . The risk of polluting the wetlands with this contaminated water (i.e. PFAS and manganese and other chemical contaminants) would be catastrophic.

75-31

17) **The UATA dig pit, must not used as part of the storm drainage system as** page. 4.8-30 in the extreme storm event. The DEIR states that it would basically be relied on to be a defacto detention basin and particularly since the soil has high arsenic levels which would soak in down into the groundwater further contaminating it. **It also appears that the UATA dig pit crater hole would be plumbed to allow this high arsenic contact soil wash into the Channel which must not be allowed.** This would contaminate the Channel A runoff water which goes downstream through neighborhoods exposing residents and then out to WIllow Slough and other water ways including the wetlands, Habitat would be impacted nd essentially poisoned by this high-level arsenic level into the Channel runoff in extreme storm condition

Furthermore, is the developer expecting the City to pick up the costs of any maintenance of this UATA dig pit such as weed abatement and mosquito control, or soil erosion issues into the future? Ther needs to be a long-term fund for the developer to pay for those costs if the UATA become part of the City.

75-32

18)) **High levels of toxaphene and lead are in the soil where the Heritage Oak Park is planned. Children playing in this park would be exposed to toxic chemicals with serious, lifelong consequences.**

The park site is the location of the former old farm house and the soil in this park area has high levels of toxaphene (a neurotoxin and probable carcinogen) and lead.in the southern part of the project site where the large park is currently planned. Children in particular should *not* be exposed to these toxics chemicals which could cause serious health problems for the rest of their lives. The Heritage Oak Park is planned to be located on land where the old farmhouse was located which has **very high levels of toxaphene is present in the soil at 1,000 - 1,200,000 mg/kg where the Department of Toxic Substances Control (DTSC) maximum allowable level is 450 mg/kg. Lead is present in levels 6.6 -93 mg/kg exceeding the DTSC and CA Ecological Risk Office limit of 80 mg/kg**. While the DEIR vaguely claims that the soil will be removed, how would this be done, where is the plan? There no specific remedial plan yet the DEIT claims that all of the potential exposure to the public of this highly contaminated soil is not significant.

"4.7-2 Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the likely release of hazardous materials into the environment. Based on the analysis below and with implementation of mitigation, the impact is less than significant."

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Further, all of this earth moving of this arsenic contaminated soil would be occurring within a one-quarter mile of the Montessori Pre-Kindergarten School at 1811 Renoir Ave. which is very close to Pole Line Road and Covell Blvd., the Birch Land Elementary School at 1600 Birch lane , and the educational Farm facility in the Cannery adjacent to the southern part of Village Farms while this earth moving is occurring in this southern part of the project.

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The DEIR dismisses the soil dust and spillage of the high level toxaphene and lead soil which would be moved by a enormous number of dump trucks. Exposure to these neighborhoods' residents east of Pole Line Rd. from Covell Blvd. going north where these tucks would be travels is also a concern.

"4.7-3 Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school. Based on the analysis below, the impact would be less than significant."

75-33 Cont.

Yet, all of this construction and earth moving of this is within a .25 mile of three school sites, including the Montessori pre-school at 1811 Renoir Ave., the Birch Lane Elementary School at 1600 Birch Land and the Cannery education school which is immediately adjacent (west) to the Village Farm project. How can the DEIR claim that movement of this soil with high levels of toxaphene and lead would be insignificant which will result with soil dust and spillage from the trucks.

The problem is that the DEIR does not specify any clear plan for remediating the toxaphene contamination at the old farmstead site, despite the fact that toxaphene is a persistent, highly toxic pesticide linked to serious human health risks; specifically, the document does not outline required cleanup measures, regulatory oversight by DTSC or financial assurances for remediation, raising concerns about whether the site will be made safe for public use."

75-34

Toxaphene is a probable human carcinogen and requires regulatory oversight for cleanup. The DEIR does not confirm whether soil removal, capping, or other remediation methods will be used. There is no mention of DTSC involvement means that cleanup may not meet state and federal safety standards. Without a remediation plan, toxaphene-contaminated soil could pose long-term risks to construction workers, residents, and park visitors. The DEIR does not state who is financially responsible for the cleanup, raising concerns about potential taxpayer liability. **Due to the extremely high concentration of toxaphene contamination in the soil, the site requires mandatory DTSC oversight.**

Further, how many parents would feel comfortable having their kids play on this field knowing massive levels of toxaphene, of up to 1.2 *million* mg/kg, a neurotoxin and probable carcinogen, and high levels of lead has been in the soil?

75-35

Also, asbestos has not been evaluated inside of the water tank house, but why has it not been evaluated? The developer owns the tank house, and if it is locked closed, he can get into it to have the testing done. As mentioned earlier, the Heritage Oak Park should be centrally located *not* on the periphery.

The serious inadequacy in the DEIR is that the proper authority should have been brought in, the Department of Toxics Substances Control (DTSC), because of the level of this contamination and the enormous volume of soil being moved which is an issue properly their jurisdiction.

So, the following actions are needed by the City:

75-36

A) The City needs to request DTSC jurisdictional determination.

B) The City needs to ask DTSC to conduct a Preliminary Endangerment Assessment.

C) When the contamination is confirmed, a Remedial Investigation/Feasibility Study is required under DTSA oversite.

D) Then, the DEIR needs to be revised and recirculated to reflect DTSC's findings and necessary mitigation measures.

The City cannot approve the Village Farms project without fully addressing the contamination risk. Failing to do so would violate CEQA's disclosure requirements and puts future residents at risk.

Letter 75 Cont.

19} The Heritage Oak Park is in the wrong location, on the perimeter exposes children and adults recreating to toxic fumes and particulate matter from car exhaust from backed-up traffic. This large park needs to be centrally located.

75-37 This large park is planned to be located at the corner of Covell Blvd. and Pole Line Rd. but should be centrally located for several reasons. The main community park if centrally located makes it easier for residents from all areas of the project to get to it. Also, this would avoid exposure of kids and adults to fumes and particulate matter from the backed-up cars in traffic at Covell Blvd. and Pole Line Road. This bad air quality from backed up car traffic would be imposed on the children and adults and potentially causing health impacts when they are recreating at the Heritage Oak Park near the busy intersection. There would also be impacts to the any habitat and the surrounding neighborhoods of noise and night lighting as well as the fumes for the backed-up car traffic.

75-38 **20) The DEIR does not to mention anything about noise or if there would be night lighting impacts from the parks, particularly if there were to be public address systems.**

21) The Reduced Acreage "Environmentally Superior Alternative" should have been included in the DEIR and needs to be added. This alternative is from the previous Covell Village DEIR (see image below) which has been a citizen-based recommendation advocated for. CEQA requires that DEIR alternatives need to be *lesser* impacts:

"The Guidelines require that the number of alternatives be limited to those that would avoid or substantially lessen any of the significant effects of the project (Section 15126(d)(5)." The Guidelines also speak to the General Plan consistency and site suitability and Village Farms has plenty of conflicts with the General Plan and its lack of suitability due to the many issues it has, and the many problems it would bring.

The DEIR is seriously flawed for many reasons, including lacking important information like the Pole Line Rd. undercrossing uncertainty, and dismissive conclusions. But it also fails to comply with CEQA requirements for EIR's to include alternatives that create *less* impacts. Yet, *all* of the alternatives are 1,800 housing units *or more,* with the exception of the "No project" and the 1,395-housing unit original proposal with the same layout as the 1,800-housing unit Proposed Project version. **The Village Farms DEIR is inadequate without**

75-39 **this reduced acreage alternative and the DEIR should have other alternatives with lesser impacts as well.**

The modifications added to the **"Reduced Acreage Environmentally Superior Alternative" (see illustration below)** were preserving the vernal pools and reducing the housing unit number to 900-100 units or less because preserving the vernal pools leaves a little more than 200 acres. The benefits of this alternative are reduced greenhouse gases (GHG) and air quality pollutants impacts. This proposal gets the housing far from the adjacent *unlined* Old City landfill and Sewage Treatment Plant and away from the majority of the 200-acre flood planning for the health, welfare, and safety of the residents of the project and the community.

Further, it is notable that the Yolo County Department of Community Services asked that a Reduced footprint alternative be included in the Village Farms Draft EIR in their Village Farms NOP comment letter.

75-39 Cont.

Covell Village Reduced Acreage Environmentally Superior Alternative



"For the Covell Village Project, the Reduced Acreage Alternative would be considered the environmentally superior alternative." - Covell Village Draft EIR page 5-32

Covell Village DEIR Reduced Acreage Environmentally Superior Alternative

75-40

22) A reduced footprint project is needed instead of developing the entire Village Farms 400-acre parcel. It makes far more sense to *not* build hundreds of houses on the bulk of the 200-acre floodplain and to distance the housing far from the landfill due to the toxics issues. If the reduced acreage project is planned, then *only the land south* of the channel should be annexed with an easement along the northside of the channel. The land above the channel should not be developed due to the bulk of the 200-acre flood plain being located there, and the adjacent unlined Old City Landfill and Sewage Treatment Plant.

75-41

23) The 2,700 housing as the "greater number of units alterative" is ridiculous. CEQA requires alternatives to be reasonable. Using an unreasonable number of housing units as an alternative which should have lesser impacts, but instead makes more impacts also make this alternative unqualified as an alternative since CEQA requires the alternative sot be lesser impacts than the primary project proposes. Not equal impacts for more impacts. This DEIR is inadequate and also invites a law suit.

75-42

24) Vernal Pools issues - I do not see language DEIR regarding the vernal pools having a conservation easement. Why not?

a) There needs to be a conservation easement on the vernal pool preservation land and it needs to be held by a non-profit land trust.

75-43

b) The vernal pools conservation easement needs to be in the Measure J/R/D baseline projecct features to be on the ballot.

75-44

b) The vernal pools constantly are referred to as "Alkaline Playa" Sometimes they are incorrectly referred to as "Alkaline Prairie" but they are not Alkaline Prairie (which is found in dryer highlands).

Letter 75 Cont.

75-44 Cont.

The terminology of "Vernal pools" needs to be included in the DEIR because endangered species such as the Vernal Pool Tadpole Shrimp present in the Village Farms vernal pools are protected by the Federal Government. Misclassifying, or using only the Alkali Prairie terminology potentially can allow a bypassing federal and state wetland protections. So, it is imperative that the term Vernal Pools be added to the DEIR to describe this rare natural habitat.

75-45

c) Also, California requires vernal pools to have a 250' buffer zone to prevent intrusive impacts to protect the vernal pools. It appears that there is some urbanization within 250" areas around the vernal pool's perimeter. Is there a 250' buffer zone and is it being adhere to prevent any urbanization on it? Also, the DEIR appears to be trying to lay ground to reduce the required 250' buffer of avoidance zone around the vernal pools to 50'.

From the Biological Resources Chapter:

" Avoidance zones may be based on a fixed buffer distance from the special-status plant population, at the limit of a hydrologic break (such as Channel A), or as otherwise determined appropriate for the species in question. For plants associated with seasonal wetlands, the Avoidance Zone shall be to be associated with wetland hydrology.

d) The DEIR states that 0.023 acres of the vernal pool would be destroyed due to construction which would include the endangered Vernal Pool Tadpoles Shrimp. This needs to be rejected. The DEIR does not even clarify where this piece of acreage is located. This vernal pool area must be preserved.

75-46

From the Biological Resources Chapter:

"Because the BRPA would preserve the 47.1-acre Natural Habitat Area, which includes the majority of the Alkali Prairie land cover within the BRPA site, potential impacts related to special-status branchiopods would be reduced, as 9.789 acres of vernal pool tadpole shrimp habitat would be avoided. However, 0.023-acre of vernal pool tadpole shrimp habitat would be permanently filled, and any cysts within permanently filled features would be crushed and buried. In addition, potential off-site activities associated with the grade-separated crossing in the Western Program Study Area could result in potential impacts to 0.104-acre of seasonal wetland in the Western Program Study Area. As such, mortality of vernal pool tadpole shrimp, as well as permanent loss of suitable habitat, would occur during construction of the BRPA."

e) These vernal pools contain the endangered Vernal Pool Tadpole Shrimp which are protected by Federal Law. The rare plants of the Alkali Milk-Vetch and the San Joaquin Spearscale native plants are extremely rare and need to be protected.

75-47

f) The BRPA proposes extensive grading and floodplain fill, altering natural floodplain functions and this can impact the vernal pools.

g) Also, existing flow patterns are replaced with artificial drainage systems, potentially disrupting subsurface water movement and natural recharge

75-48

25) California requires vernal pools to have a 250' buffer zone to prevent intrusive impacts to protect the vernal pools. It appears that there is some urbanization within 250' area around the vernal pool's perimeter. Is there a 250' buffer zone and is it being adhere to prevent any urbanization on it? Also, the DEIR appears to be trying to lay ground to reduce the required 250' buffer of avoidance zone around the vernal pools to 50' where they want to.

"Avoidance zones may be based on a fixed buffer distance from the special-status plant population, at the limit of a hydrologic break (such as Channel A), or as otherwise determined appropriate for

75-48 Cont.

the species in question. For plants associated with seasonal wetlands the Avoidance Zone shall be 250 feet, but this zone may be as small as 50 feet for plant species that occur in uplands and do not appear to be associated with wetland hydrology."

75-49

26) Any agriculture easements need to be given to a non-profit land trust.

75-50

27) Habitat impacts including the tearing out 952 trees to dig up to expand and reroute Channel A which will have significant impacts on the habitat and raises major concerns about potential flooding issues. The loss of these tree is unnecessary along much of the channel since it can be widened on one side rather than both. However, the loss of this many trees for the conversion of CO2 to O2 and the windbreak they offer together with the habitat they offer for many species of birds, some of which are protected like the Swainson's Hawks and other wildlife rely on these trees for their existence. The loss of these trees would be staggering as would the resulting impacts on the wildlife and habitat.

75-51

28) A new fire station is not needed, instead an Emergency Medical Service (EMS) makes far more sense because 90% of the fire department calls are medical, NOT fire related issues. Instead, what is needed , and has been advocate for years, is an Emergency Medical Service (EMS) which would be a fraction of the cost. How many Davis residents want to pay for the $14 million it would cost to build the fire station and

75-52

then the many millions of dollars it would cost to pay for the additional staffing (including more fire fighters), equipment and operational costs long term into the future? Also, how could a fire truck possibly get onto Covell Blvd.(particularly to go East) when the traffic is backed up most of the time?

75-53

Also, a noise issue is that the Fire Station noise from the sirens would be significant every time there is a call into the fire station does not appear to be addressed in the DEIR.

75-54

29) Unaffordable housing where the vast majority of the homes will be McMansion's, Market homes will not be cheaper than $700,000 - $800,00 but the majority of the houses will be well over $1 million. This does not help our average workers or particularly families with young kids, so this project will not help bring a lot of kids to the schools contrary to the developer's claims.(Note: While costs are not an DEIR issue, but it *is* a community issue since this housing would not help workers and young families with average incomes who will not be able to afford these homes.)

75-55

30) There is a major P,G and E gas pipeline which runs north-south through Village Farms which has had years of corrosive fertilizer chemicals used on the soil from farming which gets watered into the ground to the major gas pipe This pipeline needs to be inspected particularly if it comes anywhere near the unlined Old City Landfill since methane gas is often is an off gas from old landfills, The DEIR is inadequate because it makes no mention of mention of this inspection needed for health, welfare and safety reasons.

75-56

31) 1,800 housing units would cause a major impact on our water supply since the project will rely entirely on surface water even for landscape watering because no well water can be used due the contaminated groundwater with high levels of PFAS' "forever chemicals" manganese, arsenic, aluminum, selenium and nitrates. How much capacity would be left due to the massive water demand for this enormous 1,800-housing unit project that would be surface water dependent? Will Davis residents need to pay for expansion of the City's surface water because of Village Farms?

75-57

32) 1,800 housing units would cause a major impact on our waste water treatment plant. How much capacity would be left from the enormous draw by this 1,800-housing unit project? Will Davis residents have to pay for expansion of the waste water treatment plant because of Village Farms?

75-58

33) A Traffic Circle at Moore Ave. does *not* make sense. How is are bicyclists and pedestrians going to cross the street if the Pole Line undercrossing is not feasible? Even if it is feasible , how can a traffic circle manage the enormous amount of traffic that Pole Line Rd. already had and Moore Ave traffic, which will have even

75-58 Cont.

more cut through traffic to avoid the massive amount of traffic that Village Farms with is 1,800 housing unit would bring?

75-59

34) The DEIR state tht for its flood control design including re-routing Channel A would involve replacing a pipe with a larger pipe underneath East Covell Blvd. , Fifth St, and Sycamore and near the intersection of Anderson Road and Alvarado Ave. So, who is going to pay for this needed infrastructure due to the Village farms project? Thes costs need to be completely paid for by the developer since it is his project causing the need for these infrastructure upgrades?

75-60

In summary, The Village Farms Draft EIR is seriously flawed for many reasons, including lacking important information like the Ple Line Rd. undercrossing uncertainty, and many dismissive conclusions. . It also fails to comply with CEQA requirements for EIR's to include alternatives that create *less* impacts. One glaring deficiency is that the DEIR does not yet know the feasibility of a Pole Line undercrossing. The Pole Line undercrossing is a critical infrastructure component yet the EIR dos not if it can be built? When will it know? After a Measure J/R/D vote when they announce it is not feasible? Also, if feasible , the developer needs to pay for the entire undercrossing and not try to hoist any of the costs onto the community since it is his project that needs this undercrossing.

In addition, there are many questions and concerns about the flooding potential that are not addressed adequately in the DEIR. This project has far too many problems because it is handicapped with an enormous flood plain and is immediately adjacent to the Old City Landfill and Sewage Treatment Plant which has a long history of leaking toxics and other chemical contaminants. The DEIR was rushed and is inadequate. Furthermore , the Village Farms The project is too large, has too many site-related problems, and would bring too many impacts and costs.

Thank you for your time and consideration,

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LETTER 75: EILEEN SAMTIZ (LETTER 1 OF 6)

Response to Comment 75-1
The comment is introductory, providing an overview of concerns that are expounded on in more detail throughout the letter. Please see the below responses to comments.

Response to Comment 75-2
Please see Master Response 4.

Response to Comment 75-3
Please see Master Response 4 and Response to Comment 97-7.

Response to Comment 75-4
Please see Master Response 3.

Response to Comment 75-5
Please see Master Response 3.

Response to Comment 75-6
Please see Master Response 3.

Response to Comment 75-7
The comment identifies an inadvertent error on page 3-2 of the Project Description chapter of the Draft EIR. Importantly, the drainage studies prepared for the project included the appropriate hydrologic setting, including direction of flow in Channel A. For example, on page 4 of Appendix K to the Draft EIR (*Drainage System and Flood Control Analysis for Village Farms Davis*, Cunningham Engineering, August 8, 2024), it is stated:

> The storm water flow through the area generally flows within Channel A (Flow #3). Flow from the Covell Drain entering at the northwest corner of the project site, turns south and flows southerly as channelized flow, parallel to the Railroad tracks, following the Covell Drain line on Figure 2.

Therefore, the drainage analyses included in the Draft EIR are adequate and accurate.

Page 3-2 of the Draft EIR is hereby revised as follows:

> **Project Site Setting**
> The project site consists of generally flat, agricultural land. In addition, one agricultural structure is located in the southern portion of the site. The project site is bisected by a north-to-south private access road (L Street), which also pivots to proceed in an east-to-west direction through a portion of the site. A City of Davis drainage course (Channel A) also flows ~~east to~~ west to east through the site. Additionally, a Pacific Gas and Electric Co. (PG&E) easement occurs along the western and northern site boundaries.

Response to Comment 75-8
Please see Master Response 4.

Response to Comment 75-9

The commenter's concern is typically addressed in CEQA by evaluating whether a proposed project's vehicle trips could result in a carbon monoxide (CO) "hot spot" due to excessive idling. As discussed on page 4.3-56 of the Draft EIR:

> *Proposed Project, Biological Resources Preservation Alternative*
>
> Localized concentrations of CO are related to the levels of traffic and congestion along streets and at intersections. Concentrations of CO approaching the AAQS are only expected where background levels are high, and traffic volumes and congestion levels are high. Implementation of the Proposed Project/BRPA would increase traffic volumes on streets near the project site/BRPA site; therefore, the Proposed Project/BRPA would be expected to increase local CO concentrations.
>
> As discussed in the Method of Analysis section above, considering that the law has changed with respect to how transportation-related impacts may be addressed under CEQA such that unacceptable LOS is no longer considered a significant impact on the environment under CEQA, the analysis herein uses guidance from the nearby SMAQMD and PCAPCD. According to the SMAQMD's CEQA Guidelines, emissions of CO are generally of less concern than other criteria pollutants, as operational activities are not likely to generate substantial quantities of CO, and the SVAB has been in attainment for CO for multiple years. Additionally, the PCAPCD, which has jurisdiction over a portion of the SVAB and is adjacent to the YSAQMD, has a screening level for localized CO impacts. According to the PCAPCD screening levels, a project could result in a significant impact if the project would result in CO emissions from vehicle operations in excess of 550 lbs/day.
>
> According to the modeling performed for the Proposed Project and BRPA, operation of the Proposed Project would result in maximum unmitigated mobile source CO emissions of 425 lbs/day, and operation of the BRPA would result in maximum unmitigated mobile source CO emissions of 462 lbs/day (see Appendix C). Consequently, CO emissions related to mobile sources associated with operation of both the Proposed Project and BRPA would be below the 550 lbs/day screening threshold used by PCAPCD. Therefore, according to the PCAPCD's screening methodology for localized CO emissions, the Proposed Project/BRPA would not be expected to generate localized CO emissions that would contribute to an exceedance of AAQS, and the Proposed Project/BRPA would not expose sensitive receptors to substantial concentrations of localized CO.

Response to Comment 75-10

Please see Master Response 5 and Response to Comment 77-3.

Response to Comment 75-11

The comment expresses concerns regarding the air quality findings of the Draft EIR but does not question its adequacy. Please see Master Response 1.

Response to Comment 75-12

The comment expresses concerns regarding the air quality and VMT findings of the Draft EIR but does not question its adequacy. Please see Master Response 1.

Response to Comment 75-13
The comment expresses concerns regarding the VMT findings of the Draft EIR but does not question its adequacy. Please see Master Response 1.

Response to Comment 75-14
Please see Master Response 2.

Response to Comment 75-15
Please see Response to Comment 191-3.

Response to Comment 75-16
Please see Master Response 6.

Response to Comment 75-17
Please see Master Response 3.

Response to Comment 75-18
Please see Master Response 3.

Response to Comment 75-19
Please see Master Response 3 and Response to Comment 75-20. Groundwater flows from beneath the landfill to beneath the proposed development area and the adjacent Wildhorse subdivision. The groundwater contains PFAS and other contaminants associated with the landfill that would present potential health concerns in the case of direct contact with the groundwater. Therefore, no groundwater use is proposed in association with the project, and Cunningham has designed the drainage channel to avoid groundwater interception. The City of Davis (the owner of the landfill) will continue to monitor groundwater quality and flow direction associated with the landfill under the direction of the RWQCB Cleanup Program. Monitoring wells that are abandoned as part of Project development will be replaced or relocated as determined appropriate by the City of Davis and the RWQCB.

Response to Comment 75-20
The commenter appears to be referring to Mitigation Measure 4.7-2(e) of the Draft EIR concerning the on-site monitoring wells. Mitigation Measure 4.7-2(e) requires the applicant to consult with the Central Valley RWQCB and Yolo County Environmental Health Department prior to carrying out any actions regarding on-site monitoring wells. Thus, these agencies have full authority to decide whether all on-site monitoring wells, or a portion thereof, should remain in place.

Response to Comment 75-21
Please see Master Response 3.

Response to Comment 75-22
Please see Master Response 3.

Response to Comment 75-23
Please see Master Response 3.

Response to Comment 75-24

Please see Master Response 3. In addition, the Draft EIR (page 4.3-51), Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy, explains the dust control measures with which the project contractor would comply:

> According to YSAQMD Guidance, even projects not exceeding the YSAQMD construction-related PM thresholds should implement best management practices to reduce dust emissions and avoid localized health impacts. The YSAQMD's best management practices for dust include, but are not necessarily limited to, the following:
>
> - Watering of all active construction sites at least twice daily;
> - Maintenance of at least two feet of freeboard in haul trucks;
> - Covering of all trucks hauling dirt, sand, or loose materials;
> - Application of non-toxic binders to exposed areas after cut and fill operations and hydroseeding of area, as applicable and/or necessary;
> - Application of chemical soil stabilizers on inactive construction areas (disturbed lands within construction projects that are unused for at least four consecutive days), as applicable and/or necessary;
> - Planting of vegetative ground cover in disturbed areas as soon as possible;
> - Covering of inactive storage piles;
> - Sweeping of streets if visible soil material is carried out from the construction site; and
> - Treatment of accesses to distance of 100 feet from the paved road with a six- to 12-inch layer of wood chips, mulch, or gravel.
>
> Compliance with the aforementioned rules and regulations related to construction, as well as implementation of best management practices for dust, would help to minimize emissions generated during construction activities.

As such, the Proposed Project/BRPA would be required to implement best management practices (BMPs) to reduce dust emissions and avoid localized health impacts.

Response to Comment 75-25

Please see Master Response 3.

Response to Comment 75-26

Please see Master Response 3 regarding the arsenic portion of the comment. Annexation of the UATA (now referred to as "Northern Agricultural Area") would not "leave it vulnerable to being developed later if the developer decides to fill in the dig pit hole", as doing so would first require a General Plan amendment and subsequent CEQA review. These are discretionary actions subject to City Council approval. Should City Council approval occur, a follow-on Measure D vote would be required pursuant to City of Davis Municipal Code Section 41.01.020(b)(2)(A).

Response to Comment 75-27

Please see Response to 75-26.

Response to Comment 75-28

Please see Master Response 1.

Response to Comment 75-29
Please see Response to Comment 5-6.

Response to Comment 75-30
The results of groundwater monitoring demonstrate that contaminated groundwater from the landfill flows beneath the project site/BRPA site and the adjacent Wildhorse residential subdivision, but does not flow beneath the agricultural buffer area. Therefore, it is unlikely that potential groundwater/surface water interaction in the agricultural buffer area would result in contaminant transport. In addition, please see Master Response 3.

Response to Comment 75-31
Please see Master Response 3.

Response to Comment 75-32
Please see Master Response 3.

Response to Comment 75-33
Please see Response to Comment 75-24.

Response to Comment 75-34
Please see Master Response 3.

Response to Comment 75-35
Mitigation Measure 4.7-2(b) adequately addresses the potential asbestos-containing materials in the on-site water tank house. Pursuant to CEQA Guidelines Section 15126.4(a)(1)(B), the mitigation measure includes sufficient performance standards to ensure that if ACM are found during the survey of the water tank house prior to demolition, then the contractor shall comply with applicable regulations concerning asbestos.

Response to Comment 75-36
Please see Master Response 3.

Response to Comment 75-37
Please see Response to Comment 75-9.

Response to Comment 75-38
Contrary to the comment, park noise is addressed in Chapter 4.10, Noise, of the Draft EIR. As stated on page 4.10-15, park noise was addressed based on:

- Heritage Oak Park: Based upon the available plans, the park is anticipated to include a jungle gym play area, two half basketball courts, and a large field. The large field was assumed to accommodate a soccer field. Based upon data collected at existing parks, a jungle gym would generate levels of 55 dBA L_{eq} at a distance of 65 feet to the center, basketball courts would generate noise levels of approximately 55 dBA L_{eq} at 50 feet, and a soccer game would generate approximately 58 dBA L_eq at 200 feet to the center of the field. All amenities were modeled as operating continuously during daytime hours. Maximum noise levels from such amenities were assumed to be up to 20 dBA higher than average levels.

With respect to any lighting at the parks, Mitigation Measure 4.1-4 of the Draft EIR would address this concern by requiring shielding and directional lighting methods in accordance with City standards.

Response to Comment 75-39
Please see Master Response 2.

Response to Comment 75-40
Please see Master Response 2.

Response to Comment 75-41
Please see Master Response 2.

Response to Comment 75-42
Please see Master Response 7.

Response to Comment 75-43
Please see Master Response 7.

Response to Comment 75-44
Alkali playas are a unique type of vernal pool, characterized by their clay hardpan, large size, extended period of inundation, and halophytic plant species. Olcott Lake at Jepson Prairie is a particularly large example of this habitat type. There was no intent to suggest that these features are not vernal pools, but instead to highlight their unique status by using the name “alkali playa.” Additionally, as noted on page 4.4-8 (emphasis added), “A large alkali playa/alkali wetland complex is located within the Alkali Prairie land cover.” As noted by the commenter, alkali prairie is the surrounding upland habitat and has the potential to support a different suite of plant and animal species than the alkali playa. This is reflected in habitat suitability analyses provided for each of the special-status species with potential to occur on-site.

Response to Comment 75-45
Please see Master Response 7.

Response to Comment 75-46
As shown on Figure 4.4-6 of the Draft EIR, vernal pool tadpole shrimp were documented in the alkali playas within the Natural Habitat Area as well as in a portion of a wetland ditch on the northeastern edge of the site. As discussed in the quoted text, the habitat within the Natural Habitat Area is proposed for avoidance under the BRPA, but the habitat in the wetland ditch may be impacted. The wetland ditch is a constructed feature that runs along the proposed UATA and is entirely isolated from the natural wetland features within the Natural Habitat Area. It may or may not be impacted when soil is removed from the UATA/Northern Agricultural Area, but has been shown as impacted in the Draft EIR in case that is ultimately necessary to construct the project. Any impacts to vernal pool tadpole shrimp (and any other federally listed species that area not HCP Covered Species) will be addressed during consultation between the USACE and USFWS, and impacts would require compensatory mitigation for the species, as outlined in Mitigation Measures 4.4-15(a) through (d) of the Draft EIR.

Response to Comment 75-47

The Draft EIR acknowledges that vernal pool tadpole shrimp are federally protected by the Endangered Species Act, and acknowledges the rarity of alkali milk vetch and San Joaquin spearscale; species protection mechanisms are outlined in Mitigation Measures 4.4-1 and 4.4-3 of the Draft EIR.

Although there will be grading and fill in the current 100-year floodplain, the Channel A floodplain is presently disconnected from the channel due to extensive modifications related to historic and current agricultural uses, and the property owner and long-term farmer has never seen the agricultural fields (where the grading and fill will occur) be accessed by flood flows from Channel A. The Project proposes to construct a new, naturalized channel that would wind through a mosaic of riparian forest, native grasslands, and oak woodlands. This new channel would not be so incised, and is expected to access the newly constructed floodplain during storms ranging from the 100-year 24-hour event to the 200-year 10-day event.

The existing condition on the site is active agricultural use, and as such, the existing flow patterns are already artificial. Groundwater is pumped onto the site for irrigation of the crops that are grown on-site, and annually dug ditches convey excess water away.

Response to Comment 75-48

Please see Master Response 7.

Response to Comment 75-49

Please see Master Response 1.

Response to Comment 75-50

Please see Master Response 7.

Response to Comment 75-51

The on-site fire station would provide both fire and emergency medical services. The proposed fire station reflects input from the Davis Fire Department, which is the most appropriate entity to determine what type of facility is needed in north Davis.

Response to Comment 75-52

Funding for fire protection services, including new stations, is not a CEQA issue as the courts have made clear in *City of Hayward v. Board of Trustees of the California State University* (November 30, 2015) 242 Cal.App.4th 833. (see Draft EIR, pg. 4.12-13).

Response to Comment 75-53

Siren noise is addressed on page 4.10-21 of the Draft EIR, as follows:

> In addition, while the Proposed Project/BRPA would include development of a fire station, which could result in operational noise associated with sirens, the fire station would be located in the southern portion of the project site/BRPA site, adjacent to East Covell Boulevard. Thus, the fire station would have direct access to major roadways and the concentration of siren noise that would occur as engines leave the site would not be in proximity to existing residential uses. Therefore, further discussion of operational noise associated with the proposed fire station is not required, and the primary noise sources associated with the Proposed Project and BRPA would be noise associated with increased



traffic volumes on the local roadway network and noise associated with the proposed neighborhood services and Heritage Oak Park.

Regarding fire truck access onto Covell Boulevard, trucks are equipped with signal preemption, which would help facilitate fire truck travel along the Covell corridor. Traffic signal preemption allows the Davis Fire Department to override the normal operation of traffic lights, which gives the responding unit the ability to halt cross-traffic, while allowing traffic to flow and clear in the direction of travel for the responding emergency vehicle.

Response to Comment 75-54

Please see Master Response 1.

Response to Comment 75-55

The PG&E gas pipeline crossing the project site/BRPA site is periodically inspected and maintained by PG&E. Permitting of the project includes consultation with PG&E to ensure that the project design is compatible with the gas pipeline. At this on-site meeting, required by Mitigation Measure 4.7-2(f), the condition of the pipe can be assessed.

Response to Comment 75-56

Water supply is addressed in detail in Chapter 4.14, Utilities and Service Systems, of the Draft EIR. The water supply evaluation in Chapter 4.14 is based on the Water Supply Assessment (WSA) prepared for the project by the City's consultant, Brown and Caldwell. The WSA was prepared in accordance with California Water Code Sections 10910 through 10915.

As shown in Table 4.14-9 of the Draft EIR, the City's projected available water supply would meet the anticipated demand for water generated by the Proposed Project and the City's existing commitments, as well as reasonably foreseeable cumulative development, during normal, single dry, and multiple dry years. As noted on page 4.14-26 of the Draft EIR, the minor increase in water demand associated with the BRPA (862 AFY for BRPA vs. 850 AFY for Proposed Project) would not change this conclusion.

Response to Comment 75-57

Wastewater treatment plant capacity is further evaluated in the Partially Recirculated Draft EIR for the Village Farms Davis Project, which was released to the public for review and comment on November 17, 2025.

Response to Comment 75-58

Please see Response to Comment 97-72.

Response to Comment 75-59

Funding of infrastructure is not a CEQA issue. Please see Master Response 1.

Response to Comment 75-60

The comment consists of a broad summary of preceding concerns. Please see the responses to previous comments.

Letter 76

Dara Dungworth

From: Eileen Samitz <emsamitz@dcn.org>
Sent: Tuesday, January 14, 2025 4:39 PM
To: Dara Dungworth
Subject: Village Farms Draft EIR data needed

CAUTION: External email. Please verify sender before opening attachments or clicking on links.

Hi Dara,

76-1 I am not seeing car trip count data in the Village Farms Draft EIR.
Thanks much if you can send me that information including all the raw data that the consultants should have collected for this report.

Thanks much,

-Elieen

1

LETTER 76: EILEEN SAMITZ (LETTER 2 OF 6, 01/14/2025)

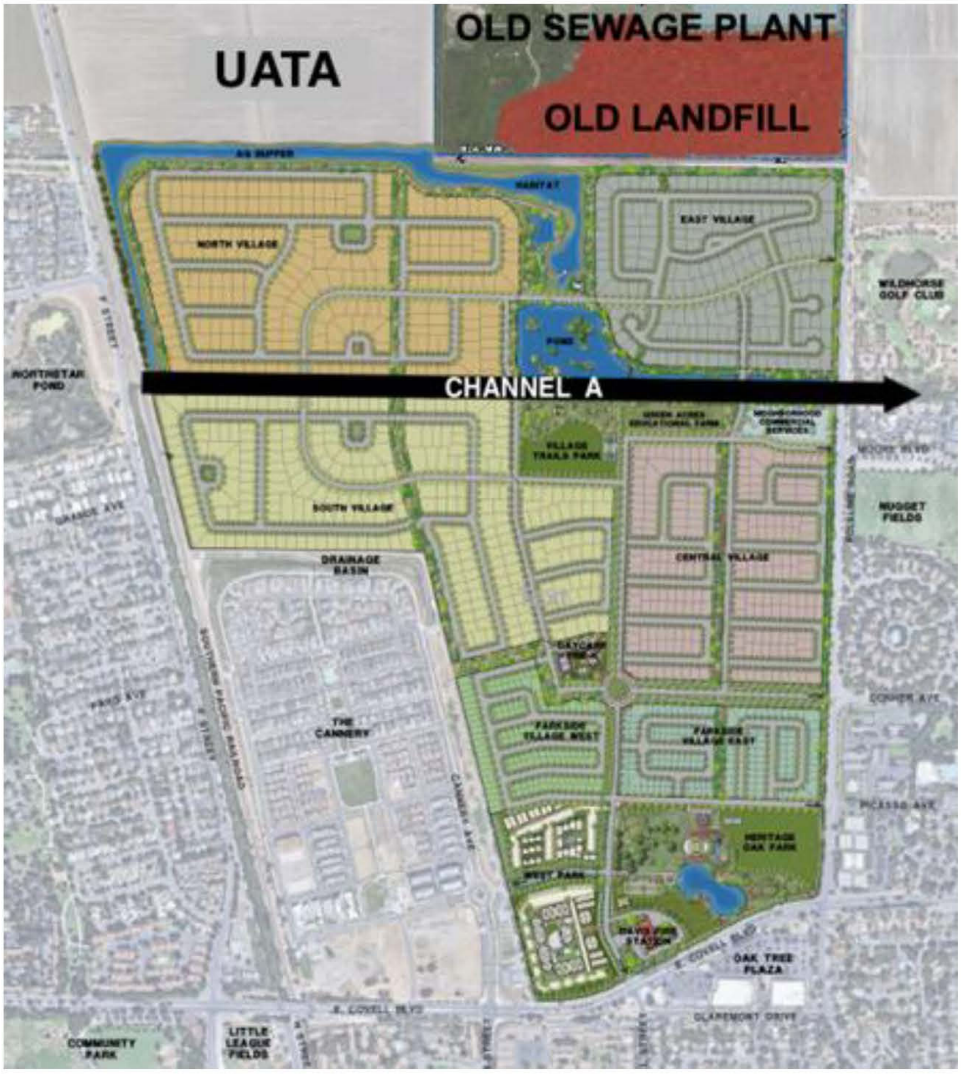
Response to Comment 76-1

Please see Master Response 5.

https://www.davisenterprise.com/forum/commentary-village-farms-deir-is-inadequate/article_2476be12-e4c8-11ef-8e2d-8feebc64a77f.html

Commentary: Village Farms DEIR is inadequate, project would bring massive impacts and costs

- By Eileen M. Samitz
- Feb 8, 2025 Updated Feb 10, 2025



Original Village Farms proposal with added locations of the Old City Landfill and Sewage Treatment Plant, Channel A, and the UATA site.

The Draft Environmental Impact Report has been released for comments on Village Farms, on a parcel outside city limits. It is the largest project ever proposed for Davis with 1,800 units on almost 500 acres. The DEIR was rushed and is inadequate since it's missing important details and makes unwarranted assumptions and conclusions.

77-1

The project has a multitude of problems primarily because it is a seriously handicapped land parcel. Issues include a 200-acre flood plain, being located adjacent to the *unlined* Old City Landfill and Sewage Treatment Plant, enormous traffic issues already at Covell Boulevard and Pole Line Road, access issues because it cannot be accessed from F Street due to the railroad tracks and there's questionable feasibility of a Pole Line undercrossing, massive impacts on habitat, and enormous costs of the infrastructure and services needed.

History

The site was first proposed for the Crossroads project in 1992, but after those developers realized that the project site was plagued with so many problems, particularly the enormous flood plain, toxics, traffic, access and infrastructure needs, that they abandoned the project and put the land up for auction.

John Whitcombe of Tandem Properties was the primary investor, who purchased the 386-acre parcel for only $3.2 million, which was a massive financial loss by the Crossroads developers.

Whitcombe proposed two earlier versions: Covell Center and later, after Measure J was approved by Davis voters, his Covell Village project was on the 2005 ballot. It was rejected by voters due to all the problems it would bring, including the massive impacts and costs. Now the 1,800 housing unit Village Farms is the latest iteration, but it has all of the same issues and even more impacts and costs.

77-2

The DEIR has been rushed to accommodate the developer's wishes to rush to a Measure J/R/D vote quickly, and as a result, it is seriously lacking in details and dismisses the serious impacts and consequences the project would bring if approved.

It is disappointing that the proposed project assumed that the vernal pools (protected by Federal law) could be paved over. The developer proposed paving over the vernal pools in previous versions, but environmentalists protested because sampling was done in dry season when the vernal pools were absent.

Vernal pools reemerge in wet seasons when seeds, including rare native plants and eggs of endangered Vernal Pool Tadpole Shrimp hatch. Public pressure motivated proper sampling this time, and these rare and endangered species were revealed confirming the vernal pools. The developer then had to add the Biological Resources Preservation Alternative version.

With the exception of the vernal pools being excluded from development in the BRPA, both the Proposed Project and the BRPA version both have 1,800 housing units, and they have the other same problems and impacts. Fortunately, the vernal pools survived discing, however the burrowing owl habitat did not in 2005.

Traffic

Traffic impacts at Covell Blvd. and Pole Line Rd. are currently incredibly impacted, but shoe-horning in 1,800 would result in gridlock with more greenhouse gases and air quality deterioration. The DEIR claims that traffic impacts would be lessened with a high density of housing, making the false assumption that residents will use much more public transit.

77-3

This is a fantasy since Davis has a minimal, inadequate and inconvenient public transit designed primarily for UC Davis, not community needs. The city has no plans to significantly expand its public transit. Creating a high

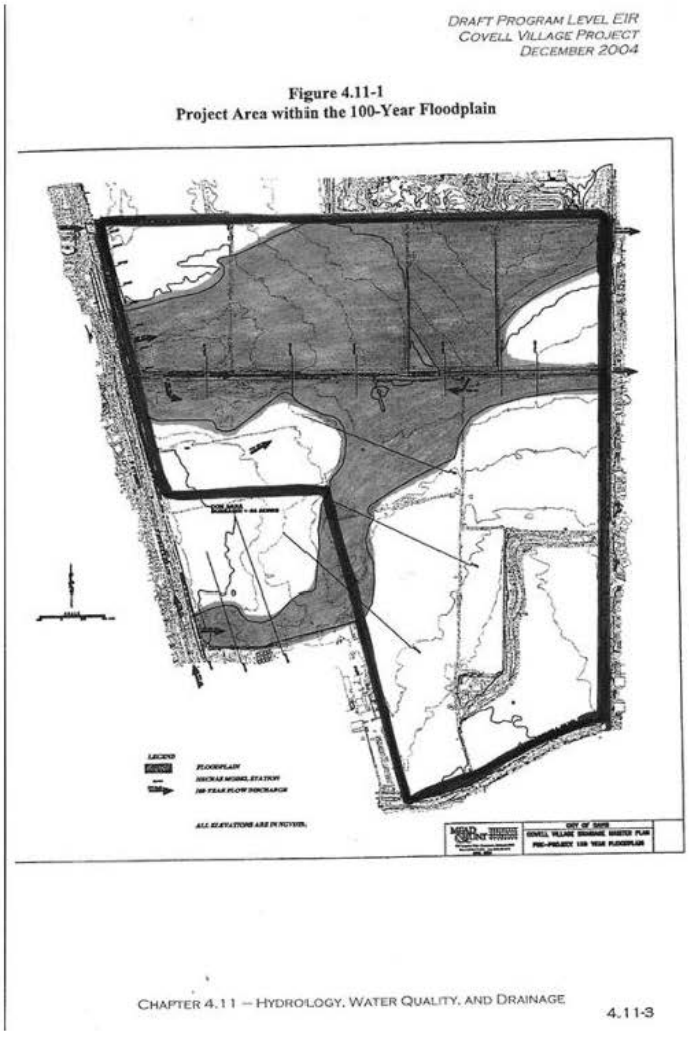
density of housing without a robust transit system would only exacerbate environment impacts by increasing traffic.

Flood plain

The enormous Village Farms flood plain is a FEMA Zone A Special Flood Hazard Area. Building hundreds of housing units on roughly 200 acres of flood plain is a huge problem, since a fundamental planning principal is that you *do not* build on enormous flood plains like this.

This is not only because of climate-change issues, but because of state legislation where California will no longer financially bail out cities foolish enough to build on flood plains like this when flooding disaster happens. That is more likely now than ever, due to climate change.

77-4



The Covell Village DEIR map showing the 100-year flood plain (darker grey area).

Letter 77

Landfill toxics

The unlined Old City Landfill and Sewage Treatment Plant adjacent (north) to Village Farms has had a long history of toxics and other chemical contaminants leaking into the groundwater.

77-5 Landfills are supposed to have large "exclusionary zones" or at least a 1,000-foot buffer zone for health and safety reasons. Village Farms should *not* be building so close to the Old City Landfill and Sewage Treatment Plant.

The toxics leaking include PFAS "forever chemicals" and manganese exceeding maximum concentration levels (MCL) recently reported from monitoring wells. How many people will want to buy a home of at least $700,000 to over $1 million sitting on land with contaminated groundwater with chemicals in high levels that cause cancer?

Soil toxics

77-6 The 118-acre Urban Ag Transition Aera is adjacent (west) to the Old City Landfill and the soil has arsenic levels that are 50 to 70 times what residential soil should have. The developers want use this soil as a "dig-pit" for filling the enormous 200-acre flood plain. The Heritage Oak Park site has toxics in the soil with toxaphene as high as 1,200,000 mg/kg and lead at 93 mg/kg, both exceeding maximum DTSC levels.

Re-routing Channel A

77-7 Trying to move and re-route the massive amount of runoff water currently being soaked up by over 400-acres of farmland could result in disastrous flooding. This includes the possibility of contaminated groundwater mixing with channel runoff, which then flows east through Wildhorse and potentially polluting the wetlands — a catastrophic scenario. Would expensive flood insurance be required of North Davis residents due to Village Farms?

Habitat impacts

77-8 The project would tear out 952 number of trees to expand and reroute Channel A which will have significant impacts on the habitat, particularly rare and endangered species, and raises major concerns about potential flooding.

Access issues

Serious access issues include no bicycle/pedestrian access via F Street because of the railroad tracks. The DEIR refers to the questionable "feasibility" of a Pole Line Road undercrossing due to existing infrastructure issues, 77-9 so there may not be a Pole Line bicycle/pedestrian undercrossing crossing, either.

Even if feasible, the developer has indicated that he would not cover the entire cost, although his project is driving the need for it. Further, this 1,800-unit project would use an enormous amount of water and wastewater treatment capacity and city services. These infrastructure costs would fall on Davis residents.

Unneeded fire station

77-10 The additional fire station being proposed is not needed because roughly 90% of the fire department calls are medical, *not* fire-related issues. An emergency medical service would make much more sense and cost far less.

Building a new fire station would cost *at least* $14 million to build, and many millions of dollars more for additional staffing (including fire fighters), equipment and operational costs long-term.

Also, how could a fire truck possibly get onto Covell Boulevard (especially going east) when the traffic is backed up most of the time?

Unaffordable housing

77-11

The average home would be at least $700,000-$800,00 according to a project representative, but the high-end homes would be far more expensive.

EIR inadequacy

The DEIR is seriously flawed for many reasons, including lacking important information like the undercrossing uncertainty, and dismissive conclusions. It also fails to comply with CEQA requirements for EIR's to include alternatives that create *less* impacts. Yet, *all* of the alternatives are 1,800 housing units *or more,* with the exception of the "No project" and the 1,395-housing unit original proposal with the same layout as the 1,800-housing unit Proposed Project version.

77-12

The City Council could have included a citizen-based recommendation for a down-sized "build below the channel" alternative, but they completely ignored it. The DEIR should have included analyzing building only below Channel A, preserving the vernal pools and reducing the housing units to a reasonable number. This design avoids the bulk of the flood plain, and moves housing much further away from the Old City Landfill and Sewage Treatment Plant toxics leakage.

In summary, it is important to submit comments and concerns about the Village Farms project and its DEIR before the 5 p.m. Feb. 25 deadline to city staff member Dara Dungworth at ddungworth@cityofdavis.org.

The 1,800-unit 497 acre Village Farms project is too big, has far too many impacts and costs, has predominately unaffordable housing and is simply bad planning. Furthermore, this project would present potential city liability issues regarding toxics, flooding and public safety issues.

Residents concerned about Village Farms project, can contact Citizens for Responsible Planning group at citizens@dcn.org.

— Eileen Samitz is a former Davis Planning Commissioner and served on the city of Davis 2001 General Plan Update land-use committee and the subsequent Housing Element Update Committee.

LETTER 77: EILEEN SAMITZ (LETTER 3 OF 6, 02/08/2025)

Response to Comment 77-1
The comment provides an overview of the following concerns expressed throughout the letter. Please refer to the following responses to comments.

Response to Comment 77-2
Please see Master Response 1.

Response to Comment 77-3
The comment incorrectly states that "The Draft EIR claims that traffic impacts would be lessened with a high density of housing, making the false assumption that residents will use much more public transit." In actuality, the Draft EIR does not assume that transit service could significantly reduce impacts associated with the project. External Walk, Bike, and Transit reductions applied in the project's trip generation estimate (Table 4.13-5) were kept considerably low.

Response to Comment 77-4
Please see Master Response 4.

Response to Comment 77-5
Please see Master Response 3.

Response to Comment 77-6
Please see Master Response 3.

Response to Comment 77-7
Please see Master Responses 3 and 4.

Response to Comment 77-8
Please see Master Response 7.

Response to Comment 77-9
Regarding bicycle/pedestrian access from F Street, please see Master Response 6. Regarding water and wastewater concerns, please see Responses to Comments 75-56 and 75-57.

Response to Comment 77-10
Please see Response to Comment 75-53.

Response to Comment 77-11
Please see Master Response 1.

Response to Comment 77-12
The comment is conclusory. Please see the previous responses to comments and Master Response 2.

Letter 78

From: Eileen Samitz <emsamitz@dcn.org>
Sent: Wednesday, February 12, 2025 2:19 PM
To: Planning Commission <PlanningCommission@cityofdavis.org>
Subject: Village Farms DEIR Comments

Dear Chair Weiss and Planning Commissioners,

78-1 I have many comments regarding the Village Farms project which I have attached as well as a recent Op-ed I wrote which was published in local media last Sunday Feb. 9th for your review. This Village Farms project has the same problems and issues as its predecessor Covell Village , as well as many deficiencies in the DEIR including lathe lack of important details and in many cases no mitigations or mitigations which are ineffective to reducing the impact to less than significant as the DEIR tries to claim repeatedly. So, the result is the DEIR is seriously flawed and inadequate. The DEIR process has clearly been rushed to accommodate the developers desire to be on the Measure J/R/D ballot quickly, and as a result the DEIR is inadequate.

Since I cover a number of issues in my attached comments, I wanted to emphasize the overview of the problems that the project continues to present, just as its predecessor Covell Village did.

78-2 **Overview: Village Farms is the largest project ever proposed in Davis for 1,800 units on almost 500 acres. The project has many problems primarily because the site is a handicapped site with a 200-acre flood plain, it is adjacent to the *unlined* Old City Landfill and Sewage Treatment Plant with a long history of leakage into the ground water of toxics and other chemical contaminants (now including PFAS "forever chemicals") , the enormous traffic issues already at Covell and Pole Line, lack of bicycle/pedestrian safe access because it cannot be accessed from F St. due to the railroad tracks, Covell Blvd. cannot have a grade-separated crossing due to existing infrastructure, and the DEIR now is questioning the "feasibility" of a Pole Line undercrossing. In additional to all of these issues, there is also the high costs imposed by the enormous amount of infrastructure needed and the massive impacts on the native plants, wildlife and habitat in the area. It is also important to recognize that the project is *not* infill per our General Plan which defines infill as land that is within the City limits, but Village Farms is outside the City limits in Yolo County.**

78-3 I also wanted to emphasize point #14 in my comments regarding the inadequacy of the DEIR since it needs to include alternatives with *lesser* impacts per CEQA. However, all the alternatives have 1,800 housing units except the "No project" and the original 1,395-unit proposal.

What at the very least that needs to be added to the DEIR is the "Reduced Acreage Environmentally Superior Alternative" from the predecessor project, Covell Village's DEIR with the modifications of preserving the vernal pools and reducing the number housings units proportionally to roughly 900-1,000 units on the remailing, roughly 205 acres.

Letter 78 Cont.

78-3 Cont.

This in turn, this avoids the major health, welfare and safety issue Old City Landfill which has had a long history leakage of toxics , now including high levels of PFAS "forever chemicals'" and manganese contaminating the groundwater in levels above screening maximum concentration levels. There are additional contaminants exceeding MCL's which may or may not be coming from the Landfill as well in the groundwater.

Here is the explanation from point #14 and the image to help illustrate this alterative which needs to the inadequate DEIR.

78-4

14) The Reduced Acreage "Environmentally Superior Alternative" should have been included in the DEIR and This alternative is from the previous Covell Village DEIR (see image below) which has been a citizen-based recommendation advocated for. CEQA requires that DEIR alternatives need to be lesser impacts:

"The Guidelines require that the number of alternatives be limited to those that would avoid or substantially lessen any of the significant effects of the project (Section 15126(d)(5)." The Guidelines also speak to the General Plan consistency and site suitability and Village Farms has plenty of conflicts with the General Plan and its lack of suitability due to the many issues it has, and the many problems it would bring.

78-5

The DEIR is seriously flawed for many reasons, including lacking important information like the undercrossing uncertainty, and dismissive conclusions. But it also fails to comply with CEQA requirements for EIR's to include alternatives that create *less* impacts. Yet, *all* of the alternatives are 1,800 housing units *or more,* with the exception of the "No project" and the 1,395-housing unit original proposal with the same layout as the 1,800-housing unit Proposed Project version. **The Village Farms DEIR is inadequate without this reduced acreage alternative and the DEIR should have other alternatives with lesser impacts as well.**

78-6

The modifications added to the **"Reduced Acreage Environmentally Superior Alternative"** were preserving the vernal pools and reducing the housing unit number proportionally to 900-100 unit because preserving the vernal pools leaves a little more than 200 acres. The benefits of this alternative are reduced greenhouse gases (GHG) and air quality pollutants impacts. This proposal gets the housing far from the adjacent *unlined* Old City landfill and Sewage Treatment Plant and away from the majority of the 200-acre flood planning for the health, welfare, and safety of the residents of the project and the community.

Further, it is notable that the Yolo County Department of Community Services asked that a Reduced footprint alternative be included in the Village Farms Draft EIR in their Village Farms NOP comment letter.

Letter 78 Cont.

78-6 Cont.

Covell Village Reduced Acreage Environmentally Superior Alternative



"For the Covell Village Project, the Reduced Acreage Alternative would be considered the environmentally superior alternative." - Covell Village Draft EIR page 5-32

Covell Village DEIR Reduced Acreage Environmentally Superior Alternative

78-7

I urge the Planning Commission to request the addition of this modified Reduced Acreage Environmentally Superior Alternative which even the County recommended. This alternative avoids the serious issue of the housing being in the flood plain and gets the housing distanced from the unlined Old City Landfill and Sewage Treatment Plant which is leaking high levels of PFFAS "forever chemicals" to protect the health, welfare and safety of the community and to avoid exposure of liability to the City for flooding and health impacts from the Village Farms project.

78-8

Thank you for your time and consideration and please feel free to contact me with any questions or for any more information my phone numbers are (530) 756-5165 (landline) or (530) 304-1624 (cell).

Eileen M. Samitz,

Former City of Davis Planning Commissioner

Letter 78 Cont.

78-9

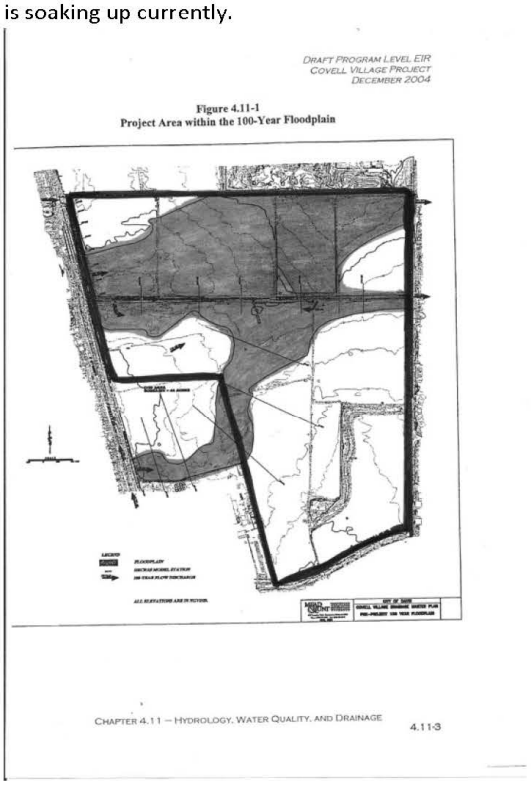
Overview: Village Farms is the largest project ever proposed in Davis for 1,800 units on almost 500 acres. The project has many problems primarily because the site is a handicapped site with a 200-acre flood plain, it is adjacent to the *unlined* Old City Landfill and Sewage Treatment Plant with a long history of leakage into the ground water of toxics and other chemical contaminants (now including PFAS "forever chemicals"), the enormous traffic issues already at Covell and Pole Line lack of bicycle/pedestrian safe access issues because it cannot be accessed from F St. due to the railroad tracks, Covell Blvd. cannot have a grade-separated crossing due to existing infrastructure, and the DEIR now is questioning the "feasibility" of a Pole Line undercrossing. In additional to all of these issues, there is also the high costs imposed by the enormous amount of infrastructure needed and the massive impacts on the native plants, wildlife and habitat in the area. It is also important to recognize that the project is *not* infill per our General Plan which defines infill as land that is within the City limits, but Village Farms is outside the City limits in Yolo County.

The following are comments regarding issues and impacts not addressed adequately in the DEIR and other issues:

1) **200-acre Floodplain** - Village Farms has an enormous flood plain of over 200 acres on covering roughly half of the land to be developed which is a FEMA Zone A Flood Hazard flood plain. A fundamental principal of good planning is to NOT build on enormous flood plains like this, particularly to try to shoe-horn in 1,800 on the parcel. Trying to engineer away a flood plain which take up at least half of the land to be developed makes no sense. The last thing we need in Davis is for the City to experience the flooding Natomas has had because the planning failed to engineer control of flooding in the flood plain. (see graphic below, Covell Village DEIR)

   This project exposes the City to financial risk due to the flooding potential. It is noteworthy that per California's legislation the State will no longer financially bail out cities foolish enough to build on enormous flood plains like this. Wildhorse currently has had flooding issues due to climate change which can only get worse if the Village Farms project tried to re-route the enormous amount of water that 400 acres of ag land is soaking up currently.

78-10



Letter 78 Cont.

78-11

2) **Traffic impacts which would be incredibly worse than it is now from adding 1,800 more housing units at Covell Blvd. and Pole Line Road** which is already incredibly impacted. Shoe-horning in 1,800 units on this Village Farms site will only cause a more massive number of backed-up idling cars, which in turn will increase greenhouse gases and air pollution form car exhaust fumes and particulate matter. The air pollution in turn will deteriorate air quality and potentially have health impacts. The location of the Oak Heritage Park at Covell Blvd. And Pole Line Rd. would, in particular expose young children and adults recreating will be breathing more heavily from exercising and taking in more this polluted air. So, this then becomes a health issue as well an impact on our climate from the greenhouse gases (GHG's). All of these impacts are CEQA issues but the DEIR is dismissive of these issues.

78-12

The theory that you would have lower VMT's if you cram in much more housing is illogical because it would rely on a robust public transit system that people actually used significantly. However, the City has no plan to significantly improve its currently minimal, inconvenient and inadequate public transit system which is designed primarily to serve UCD's needs. Creating higher densities without the infrastructure of a robust transit system would only impact the environment far more due to more backed-up traffic and its environmental and health impacts. The DEIR is inadequate because it is not accurately factoring in the minimal public transit system that Davis has, and that it has no plans to significantly expand to the robust level of a system that would be needed to try to offset the traffic impacts in order to lower VMTs.

Beyond this, you cannot assume people will use even a robust public transit system particularly for your families with kids that need to be transported by their parent to school usually and their other activities. If Davis wanted to lower its VMT numbers it should start by getting a school bus system in town instead of hundreds of parents driving their kids to and from school daily .

78-13

The DEIR admits that the air quality would deteriorate with the Biological Resources Preservation Alternative (BRPA) . This is clearly due to cramming in 1,800 housing units, which in turned, would generate a massive amount of car traffic that will be backed up along Covell Blvd. nd Pole Line Road. The resulting huge volume of fumes and particulate matter from care exhaust emissions would cause health impacts.

Conclusion from Air Quality, GHG emissions, and Energy Chapter:

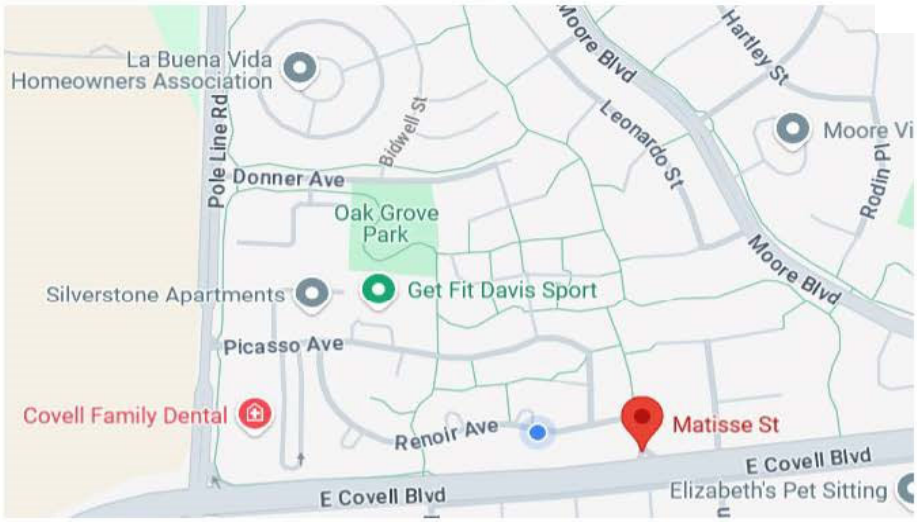
"Based on the above, operation of the Proposed Project and the BRPA could violate an air quality standard or contribute substantially to an existing or projected air quality violation. Therefore, the Proposed Project and BRPA would be considered to result in a significant impact related to air quality."

78-14

3) **Picasso, Renoir and Matisse would become a thru-way short-cut with massive traffic impacting the safety of the neighborhood.** There is no mitigation measure even attempted for the massive amount of traffic that would cut through the Green Meadows neighborhood on Matisse St. , Renoir Ave, and Picasso Ave. of cars going between Covell Bld. and Pole Line road to try to avoid the Covell and Pole Line Road intersections. These streets are narrow and curved and only have one side of the street parking. There is speeding of cars cutting through currently doing this and the massive increase in this cut-through traffic would make it dangerous conditions for this neighborhood. (see graphic below of Matisse St., Renoir Ave, and Picasso Ave. connecting Covell Blvd. with Pole Line Road)

Letter 78 Cont.

78-14 Cont.



78-15

4) **Serious lack of bicycle/pedestrian safe access issues.** There is no connectivity because the project cannot get a grade -separated crossing at F St . since the Railroad won't permit it. There is no way to provide a grade-separated crossing over or under Covell Blvd. due to existing infrastructure Further, the DEIR states that is uncertain if a Pole Line Rd. undercrossing is *feasible*. **This is a significant inadequacy of the DEIR.** Why does the DEIR not know yet if an undercrossing is feasible or not? When will they know if a Pole Line Rd. undercrossing is feasible? Are they waiting until after the ballot to announce that it is not feasible, or that they still aren't sure if it is feasible? The DEIR is seriously inadequate by trying to side-step this critical infrastructure question. The EIR process has been rushed and is deficient on providing many important details like this which is inexcusable. The developer needs to get these answers and come back when the DEIR has an answer to this infrastructure issue and provides other absent details in the document.

78-16

Another issue is that developer needs to agree to cover the entire cost of the undercrossing if it is feasible, since it is *his* project driving the need for it. Davis residents should not be expected to be paying for the Village Farms infrastructure needs.

78-17

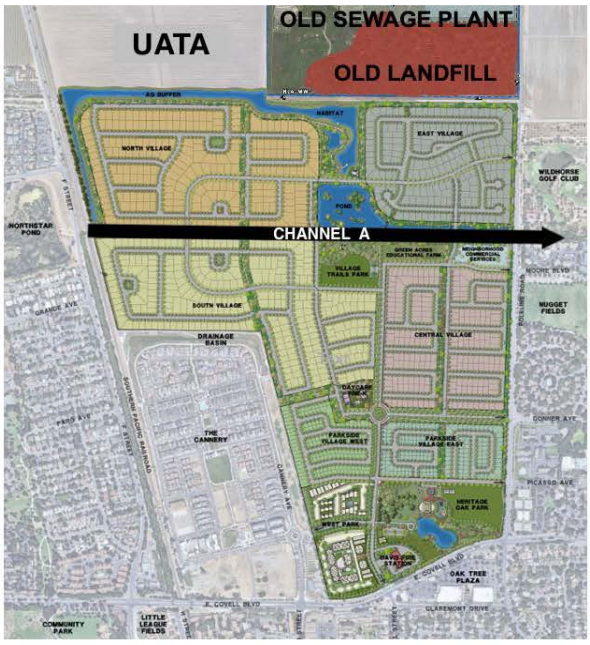
5) **Toxics from the immediately adjacent Old City Landfill and Sewage Treatment Plant** – Landfills are now required to have huge "exclusionary zones" as a perimeter where not urban development is permitted for health, welfare and safety reasons. Often a mile or more around a landfill likewise old landfills also need to have an exclusionary zone. **A minimum of 1,000-foot buffer zones are often required of old landfills. The City can and needs to require at least a 1,000-foot buffer zone around this *unlined* Old City landfill for the health, welfare and safety of the community.**

78-18

PFAS "forever chemicals" which are carcinogenic and manganese have monitored recently exceeding screening maximum concentration levels (MCL's) in the groundwater of the Village Farms project and the Old City Landfill. Failure to do so would be irresponsible and expose the City to legal liability in the future due to the potential health, welfare and safety impacts on the community. The DEIR is dismissive of these toxics including PFAS's which are carcinogenic could cause serious health issues. The DEIR is inadequate regarding these serious toxics and chemical contaminants. (see graphic below)

Letter 78 Cont.

78-18 Cont.



6) It is notable that the Yolo County Department of Environmental Health Village Farms NOP comment letter states that the City of Davis may need to install monitoring wells on the Old City Landfill for methane gas monitoring for health and safety reasons due to Village Farms residential. This methane monitoring will induce cost for the City long-term including a Phase II investigation (see below). The DEIR does not address this. What if methane gas levels rise in the Landfill where there are homes build close to it? City liability?

78-19

<u>From the December 8, 3034 Yolo County Environmental Safety Division:</u>
"The Old Davis Landfill may need to install monitoring wells as a protection measure for landfill gas migration because of the proposed residential development on the adjacent project parcel within 1,000 feet of the landfill footprint, The prescriptive methane compliance standard at the landfill property boundary is 5% by volume in air, however, a lower standard of methane applies to occupied structures. The landfill may have to implement corrective actions oat lower monitoring readings than 5% at the property boundary should the levels be a significant threat to the nearby development."

"The waste cell boundaries may need to be delineated to determine gas monitoring well placement. This delineation may require additional Phase II investigation which may include trenching or bore hole excavation."

7) **Potential mixing of groundwater with Channel A runoff risks.** This serious problem can very well result because the area has an enormous flood plain which is a **FEMA Zone A Special Flood Hazard Area,** Furthermore, climate change is bringing more extreme storm events and also less ground water is being drawn since the City has been using surface water. Also, fewer City wells are used at this point for various reasons including some shutdown due to high chromium levels. As a result, ground water levels have been higher at times in some areas including in this Village Farms area (see table 4.8-3 pg. 4.8-8) increasing the risk of the groundwater mixing with the channel water. These factors added the presence of the huge 200-acre flood plain creates even more flooding potential for this area combined with climate change events increasing with more frequency.

78-20

Letter 78 Cont.

The problem that potentially can result that the Channel A water mixed with this contaminated groundwater including high levels of PFAS "forever chemicals" (which are carcinogenic) manganese, aluminum, arsenic, and nitrates would flow to the east though Wildhorse exposing those neighbors and the wildlife and habitat and continuing to the east to the wetlands. PFAS are long-lived chemicals that accumulate and magnify up the food chain impacting wildlife. The outcome would be contamination of the wetlands polluting the water and destroying the habitat. This would be catastrophic .

78-21 The DEIR acknowledges this issue, therefore the risk of this groundwater contamination of the channel runoff potentially occurring:

"In an effort to ensure that contaminated groundwater associated with the Old Davis Landfill does not enter the proposed storm water system for the Proposed Project/BRPA, Geocon prepared a Channel Evaluation Report to assess the depth to which contaminated groundwater could be encountered on-site during excavation of the drainage system, including channel and detention basin. As previously discussed, and shown in Figure 4.8-3, the substantial majority of groundwater elevation data points are below 26.5 feet amsl. Thus, the Drainage Channel Evaluation prepared for the Proposed Project/BRPA by Geocon recommended the proposed drainage channel be designed with a base elevation above the groundwater elevation (i.e., 26.5 feet amsl) to limit the infiltration of groundwater into the channel that may be impacted by PFAS or manganese".

8) **Soil contaminants present exposure risks to residents and potential liability to the City The EIR is also deficient and dismissive regarding the soil toxics and chemical contaminants in the soil, particularly those above maximum concentration levels (MCL's). The developer plans to use the Urban Ag Transition Area (UATA) soil as a dig pit to try to fill in the 200-acre flood plain. The DEIR estimates moving at least 1 MILLION CUBIC YARDS of the UATA soil to fill in the flood plain.** However, this UATA soil that is very high in arsenic for residential soil exceeding maximum concentration levels. The UATA soil tested revealed that the arsenic levels range between 6.1 – 8 mg/kg, but should not be more than 0.11 mg/kg for residential soil. **This means the arsenic lever of this dig pit soil being used to fill the flood plain that will have residential housing built on it would be 56X – 73X higher than should be in residential soil.** This is yet another health, welfare and safety issue and could potentially expose the City to liability later on.

78-22

9) **This UATA dig pit site must not be permitted to be filled in later on and developed**, particularly due to the high arsenic levels and its proximity directly adjacent to the unlined Old City Landfill. And Sewage Treatment Plant. Any consideration of development should be prohibited in the baseline project features, or must at the very least be subject to a Measure J/R/D vote just like the General Plan Urban Reserve land use designation.

78-23

10) **UATA dig pit site cannot be used for ag mitigation credit.** It is rather odd to refer to this dig pit area is being defined as an Urban Ag Transition Area (UATA) since there is nothing agricultural about it if it is being use as a dig pit. If the developer anticipates asking for ag mitigation land for this crater-sized hole in the ground, the City need to be clear that there is *no* way that ag mitigation credit would be given for this. This crater-sized 10' deep hole would essentially become a defacto water detention basin where runoff for the adjacent unlined landfill would collect into the dig pit hole and soak down into the ground water producing a continuous feed of contamination into the groundwater. This groundwater communicates with the rest of the Village Farms groundwater that will make its way to potentially communicate with Channel water. This potentially contaminated groundwater circulates and can make its way to mix with channel runoff. This potentially contaminated channel runoff would then run through Wildhorse , exposing those residents and wildlife, and out to the wetlands eventually . The risk of polluting the wetlands with this contaminated water (i.e. PFAS and manganese and other chemical contaminants) would be catastrophic.

78-24

78-25

Letter 78 Cont.

11) High levels of toxaphene and lead are in the soil where the Heritage Oak Park is pla

Furthermore, the soil in this park area has high levels of toxaphene (a neurotoxin and probable carcinogen) and lead.in the southern part of the project site where the large park is currently planned. Children in particular should *not* be exposed to these toxics chemicals which could cause serious health problems for the rest of their lives. The Heritage Oak Park is planned to be located on land where the old farmhouse was located which has **very high levels of toxaphene is present in the soil at 1,000 - 1,200,000 mg/kg where the Department of Toxic Substances Control (DTSC) maximum allowable level is 450 mg/kg. Lead is present in levels 6.6 -93 mg/kg and the DTSC and CA Ecological Risk Office maximum allowable level is 80 mg/kg**. While the DEIR claims that the soil will be removed, how would this be done, where is the plan?

78-26 **The DEIR does not specify any clear plan for remediating the toxaphene contamination at the old farmstead site, despite the fact that toxaphene is a persistent, highly toxic pesticide linked to serious human health risks; specifically, the document does not outline required cleanup measures, regulatory oversight by DTSC or financial assurances for remediation, raising concerns about whether the site will be made safe for public use."**

Toxaphene is a probable human carcinogen and requires regulatory oversight for cleanup. The DEIR does not confirm whether soil removal, capping, or other remediation methods will be used. There is no mention of DTSC involvement means that cleanup may not meet state and federal safety standards. Without a remediation plan, toxaphene-contaminated soil could pose long-term risks to construction workers, residents, and park visitors. The DEIR does not state who is financially responsible for the cleanup, raising concerns about potential taxpayer liability. **Due to the extremely high concentration of toxaphene contamination in the soil, the site requires mandatory DTSC oversight.**

Further, how many parents would feel comfortable having their kids play on this field knowing massive levels of toxaphene, of up to 1.2 *million* mg/kg, a neurotoxin and probable carcinogen, has been in the soil?

78-27 Also, asbestos has not been evaluated inside of the water tank house, but why has it not been evaluated? The developer owns the tank house, and if it is locked closed, he can get into it to have the testing done. As mentioned earlier, the Heritage Oak Park should be centrally located *not* on the periphery.

12} The Heritage Oak Park is in the wrong location, on the perimeter exposes children and adults recreating to toxic fumes and particulate matter from car exhaust from backed-up traffic. This large park needs to be centrally located.

78-28 This large park is planned to be located at the corner of Covell Blvd. and Pole Line Rd. but should be centrally located for several reasons. The main community park if centrally located makes it easier for residents from all areas of the project to get to it. Also, this would avoid exposure of kids and adults to fumes and particulate matter from the backed-up cars in traffic at Covell Blvd. and Pole Line Road. This bad air quality from backed up car traffic would be imposed on the children and adults and potentially causing health impacts when they are recreating at the Heritage Oak Park near the busy intersection. There would also be impacts to the any habitat and the surrounding neighborhoods of noise and night lighting as well as the fumes for the backed-up car traffic.

78-29 **13) The DEIR does not to mention anything about noise or if there would be night lighting impacts from the parks, particularly if there were to be public address systems.**

78-30 **14) The Reduced Acreage "Environmentally Superior Alternative" should have been included in the DEIR and needs to be added.** _This alternative is from the previous Covell Village DEIR (see image below) which has been a citizen-based recommendation advocated for. CEQA requires that DEIR alternatives need to be *lesser* impacts:

Letter 78 Cont.

"The Guidelines require that the number of alternatives be limited to those that would avoid or substantially lessen any of the significant effects of the project (Section 15126(d)(5)." The Guidelines also speak to the General Plan consistency and site suitability and Village Farms has plenty of conflicts with the General Plan and its lack of suitability due to the many issues it has, and the many problems it would bring.

The DEIR is seriously flawed for many reasons, including lacking important information like the Pole Line Rd. undercrossing uncertainty, and dismissive conclusions. But it also fails to comply with CEQA requirements for EIR's to include alternatives that create *less* impacts. Yet, *all* of the alternatives are 1,800 housing units *or more,* with the exception of the "No project" and the 1,395-housing unit original proposal with the same layout as the 1,800-housing unit Proposed Project version. **The Village Farms DEIR is inadequate without this reduced acreage alternative and the DEIR should have other alternatives with lesser impacts as well.**

The modifications added to the **"Reduced Acreage Environmentally Superior Alternative"** were preserving the vernal pools and reducing the housing unit number proportionally to 900-100 unit because preserving the vernal pools leaves a little more than 200 acres. The benefits of this alternative are reduced greenhouse gases (GHG) and air quality pollutants impacts. This proposal gets the housing far from the adjacent ***unlined*** Old City landfill and Sewage Treatment Plant and away from the majority of the 200-acre flood planning for the health, welfare, and safety of the residents of the project and the community.

Further, it is notable that the Yolo County Department of Community Services asked that a Reduced footprint alternative be included in the Village Farms Draft EIR in their Village Farms NOP comment letter.

78-30 Cont.

Covell Village Reduced Acreage Environmentally Superior Alternative



"For the Covell Village Project, the Reduced Acreage Alternative would be considered the environmentally superior alternative." - Covell Village Draft EIR page 5-32

Covell Village DEIR Reduced Acreage Environmentally Superior Alternative

78-31

15) Vernal Pools issues - I do not see language DEIR regarding the vernal pools having a conservation easement. Why not? There would need to be a conservation easement on the vernal pool preservation land and it needs to be held by a land trust.

Letter 78 Cont.

78-32 The vernal pools constantly are referred to as "Alkaline Playa" Sometimes they are incorrectly referred to as "Alkaline Prairie" but they are not Alkaline Prairie (which is found in dryer highlands). The terminology of "Vernal pools" needs to be included in the DEIR because endangered species such as the Vernal Pool Tadpole Shrimp present in the Village Farms vernal pools are protected by the Federal Government.

78-33 Also, California requires vernal pools to have a 250' buffer zone to prevent intrusive impacts to protect the vernal pools. It appears that there is some urbanization within 250" areas around the vernal pool's perimeter. Is there a 250' buffer zone and is it being adhere to prevent any urbanization on it? Also, the DEIR appears to be trying to lay ground to reduce the required 250' buffer of avoidance zone around the vernal pools to 50'.

From the Biological Resources Chapter:

> " ***Avoidance zones may be based on a fixed buffer distance from the special-status plant population, at the limit of a hydrologic break (such as Channel A), or as otherwise determined appropriate for the species in question. For plants associated with seasonal wetlands, the Avoidance Zone shall be to be associated with wetland hydrology.***

78-34 The DEIR states that 0.023 acres of the vernal pool would be destroyed due to construction which would include the endangered Vernal Pool Tadpoles Shrimp. This needs to be rejected. The DEIR does not even clarify where this piece of acreage is located. This vernal pool area must be preserved.

From the Biological Resources Chapter:

> ***"Because the BRPA would preserve the 47.1-acre Natural Habitat Area, which includes the majority of the Alkali Prairie land cover within the BRPA site, potential impacts related to special-status branchiopods would be reduced, as 9.789 acres of vernal pool tadpole shrimp habitat would be avoided. However, 0.023-acre of vernal pool tadpole shrimp habitat would be permanently filled, and any cysts within permanently filled features would be crushed and buried. In addition, potential off-site activities associated with the grade-separated crossing in the Western Program Study Area could result in potential impacts to 0.104-acre of seasonal wetland in the Western Program Study Area. As such, mortality of vernal pool tadpole shrimp, as well as permanent loss of suitable habitat, would occur during construction of the BRPA."***

78-35 **16) California requires vernal pools to have a 250' buffer zone to prevent intrusive impacts to protect the vernal pools.** It appears that there is some urbanization within 250' area around the vernal pool's perimeter. Is there a 250' buffer zone and is it being adhere to prevent any urbanization on it? Also, the DEIR appears to be trying to lay ground to reduce the required 250' buffer of avoidance zone around the vernal pools to 50' where they want to.

> ***"Avoidance zones may be based on a fixed buffer distance from the special-status plant population, at the limit of a hydrologic break (such as Channel A), or as otherwise determined appropriate for the species in question. For plants associated with seasonal wetlands, the Avoidance Zone shall be 250 feet, but this zone may be as small as 50 feet for plant species that occur in uplands and do not appear to be associated with wetland hydrology."***

78-36 **17) Habitat impacts including the tearing out 952 trees to dig up to expand and reroute Channel A** which will have significant impacts on the habitat and raises major concerns about potential flooding issues. The loss of these tree is unnecessary along much of the channel since it can be widened on one side rather than both. However, the loss of this many trees for the conversion of CO2 to O2 and the windbreak they offer

Letter 78 Cont.

78-36 Cont. together with the habitat they offer for many species of birds, some of which are protected like the Swainson's Hawks and other wildlife rely on these trees for their existence. The loss of these trees would be staggering as would the resulting impacts on the wildlife and habitat.

78-37 **18) A new fire station is not needed, instead an Emergency Medical Service (EMS) makes far more sense because 90% of the fire department calls are medical, NOT fire related issues**. Instead, what is needed , and has been advocate for years, is an Emergency Medical Service (EMS) which would be a fraction of the cost. How many Davis residents want to pay for the $14 million it would cost to build the fire station and then the many millions of dollars it would cost to pay for the additional staffing (including more fire fighters), equipment and operational costs long term into the future? Also, how could a fire truck possibly get onto Covell Blvd.(particularly to go East) when the traffic is backed up most of the time?

78-38

78-39 Also, the Fire Station noise from the sirens would be significant every time there is a call into the fire station does not appear to be addressed in the DEIR.

78-40 **19) Unaffordable housing where the vast majority of the homes will be McMansion's**, Market homes will not be cheaper than $700,000 - $800,00 but the majority of the houses will be well over $1 million. This does not help our average workers or particularly families with young kids, so this project will not help bring a lot of kids to the schools contrary to the developer's claims.(Note: While costs are not an DEIR issue, but it *is* a community issue since this housing would not help workers and young families with average incomes who will not be able to afford these homes.)

78-41 **20) There is a major P,G and E gas pipeline which runs north-south through Village Farms** which has had years of corrosive fertilizer chemicals used on the soil from farming which gets watered into the ground to the major gas pipe This pipeline needs to be inspected particularly if it comes anywhere near the unlined Old City Landfill since methane gas is often is an off gas from old landfills, The DEIR is inadequate because it makes no mention of mention of this inspection needed for health, welfare and safety reasons.

78-42 **21) 1,800 housing units would cause a major impact on our water supply** since the project will rely entirely on surface water even for landscape watering because no well water can be used due the contaminated groundwater with high levels of PFAS' "forever chemicals" manganese, arsenic, aluminum, selenium and nitrates. How much capacity would be left due to the massive water demand for this enormous 1,800-housing unit project that would be surface water dependent? Will Davis residents need to pay for expansion of the City's surface water because of Village Farms?

78-43 **22) 1,800 housing units would cause a major impact on our waste water treatment plant**. How much capacity would be left from the enormous draw by this 1,800-housing unit project? Will Davis residents have to pay for expansion of the waste water treatment plant because of Village Farms?

78-44 **In summary, The Village Farms Draft EIR is seriously flawed for many reasons, including lacking important information like the Ple Line Rd. undercrossing uncertainty, and many dismissive conclusions**. . It also fails to comply with CEQA requirements for EIR's to include alternatives that create *less* impacts. One glaring deficiency is that the DEIR does not yet know the feasibility of a Pole Line undercrossing. The Pole Line undercrossing is a critical infrastructure component yet the EIR dos not if it can be built? When will it know? After a Measure J/R/D vote when they announce it is not feasible? Also, if feasible , the developer needs to pay for the entire undercrossing and not try to hoist any of the costs onto the community since it is his project that needs this undercrossing.

In addition, there are many questions and concerns about the flooding potential that are not addressed adequately in the DEIR. This project has far too many problems because it is handicapped with an enormous flood plain and is immediately adjacent to the Old City Landfill and Sewage Treatment Plant which has a long history of leaking toxics and other chemical contaminants. The DEIR was rushed and is inadequate.

Letter 78 Cont.

78-44 Cont.

Furthermore , the Village Farms The project is too large, has too many site-related problems, and would bring too many impacts and costs.

Thank you for your time and consideration,

Eileen M. Samitz,

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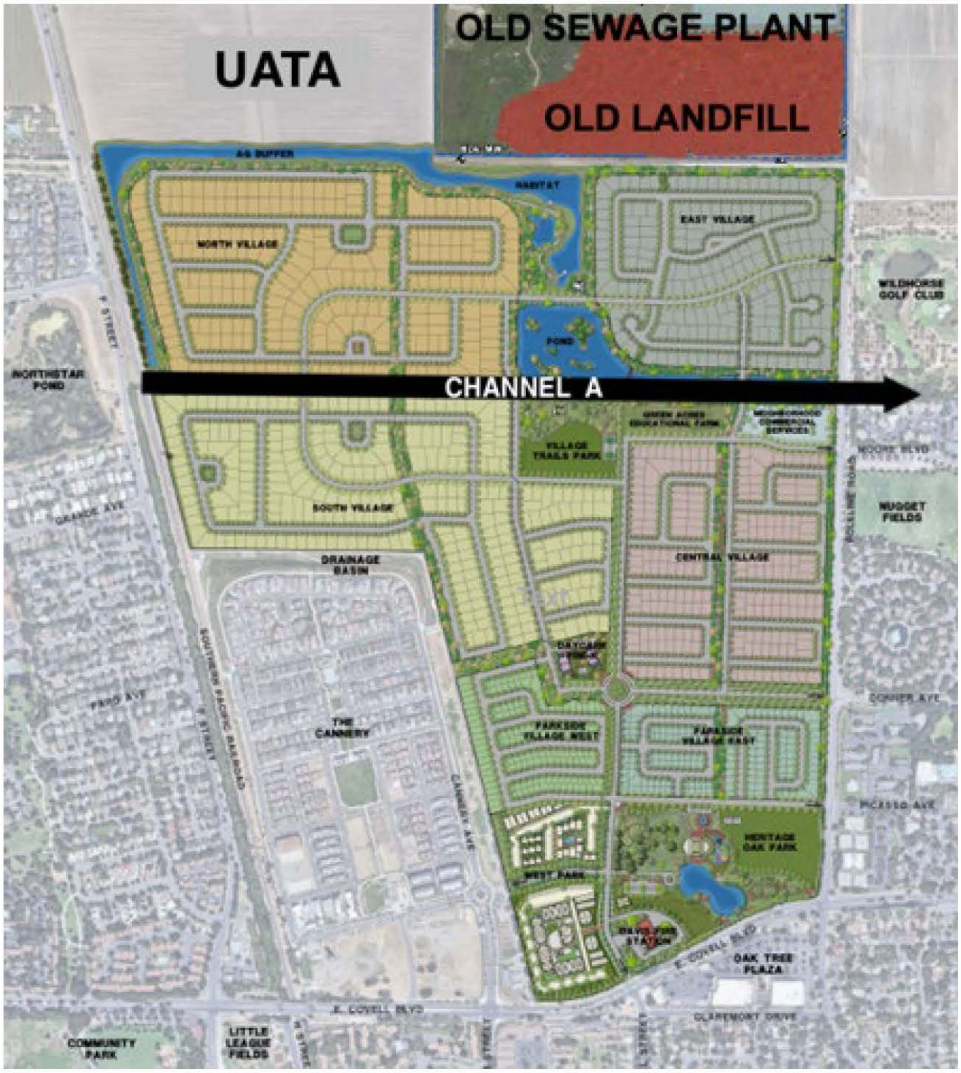
Letter 78 Cont.

78-45

https://www.davisenterprise.com/forum/commentary-village-farms-deir-is-inadequate/article_2476be12-e4c8-11ef-8e2d-8feebc64a77f.html

Commentary: Village Farms DEIR is inadequate, project would bring massive impacts and costs

- By Eileen M. Samitz
- Feb 8, 2025 Updated Feb 10, 2025



Original Village Farms proposal with added locations of the Old City Landfill and Sewage Treatment Plant, Channel A, and the UATA site.

Letter 78 Cont.

78-45 Cont.

The Draft Environmental Impact Report has been released for comments on Village Farms, on a parcel outside city limits. It is the largest project ever proposed for Davis with 1,800 units on almost 500 acres. The DEIR was rushed and is inadequate since it's missing important details and makes unwarranted assumptions and conclusions.

The project has a multitude of problems primarily because it is a seriously handicapped land parcel. Issues include a 200-acre flood plain, being located adjacent to the *unlined* Old City Landfill and Sewage Treatment Plant, enormous traffic issues already at Covell Boulevard and Pole Line Road, access issues because it cannot be accessed from F Street due to the railroad tracks and there's questionable feasibility of a Pole Line undercrossing, massive impacts on habitat, and enormous costs of the infrastructure and services needed.

History

The site was first proposed for the Crossroads project in 1992, but after those developers realized that the project site was plagued with so many problems, particularly the enormous flood plain, toxics, traffic, access and infrastructure needs, that they abandoned the project and put the land up for auction.

John Whitcombe of Tandem Properties was the primary investor, who purchased the 386-acre parcel for only $3.2 million, which was a massive financial loss by the Crossroads developers.

Whitcombe proposed two earlier versions: Covell Center and later, after Measure J was approved by Davis voters, his Covell Village project was on the 2005 ballot. It was rejected by voters due to all the problems it would bring, including the massive impacts and costs. Now the 1,800 housing unit Village Farms is the latest iteration, but it has all of the same issues and even more impacts and costs.

78-46

The DEIR has been rushed to accommodate the developer's wishes to rush to a Measure J/R/D vote quickly, and as a result, it is seriously lacking in details and dismisses the serious impacts and consequences the project would bring if approved.

It is disappointing that the proposed project assumed that the vernal pools (protected by Federal law) could be paved over. The developer proposed paving over the vernal pools in previous versions, but environmentalists protested because sampling was done in dry season when the vernal pools were absent.

Vernal pools reemerge in wet seasons when seeds, including rare native plants and eggs of endangered Vernal Pool Tadpole Shrimp hatch. Public pressure motivated proper sampling this time, and these rare and endangered species were revealed confirming the vernal pools. The developer then had to add the Biological Resources Preservation Alternative version.

With the exception of the vernal pools being excluded from development in the BRPA, both the Proposed Project and the BRPA version both have 1,800 housing units, and they have the other same problems and impacts. Fortunately, the vernal pools survived discing, however the burrowing owl habitat did not in 2005.

Traffic

Traffic impacts at Covell Blvd. and Pole Line Rd. are currently incredibly impacted, but shoe-horning in 1,800 would result in gridlock with more greenhouse gases and air quality deterioration. The DEIR claims that traffic impacts would be lessened with a high density of housing, making the false assumption that residents will use much more public transit.

78-47

This is a fantasy since Davis has a minimal, inadequate and inconvenient public transit designed primarily for UC Davis, not community needs. The city has no plans to significantly expand its public transit. Creating a high

Letter 78 Cont.

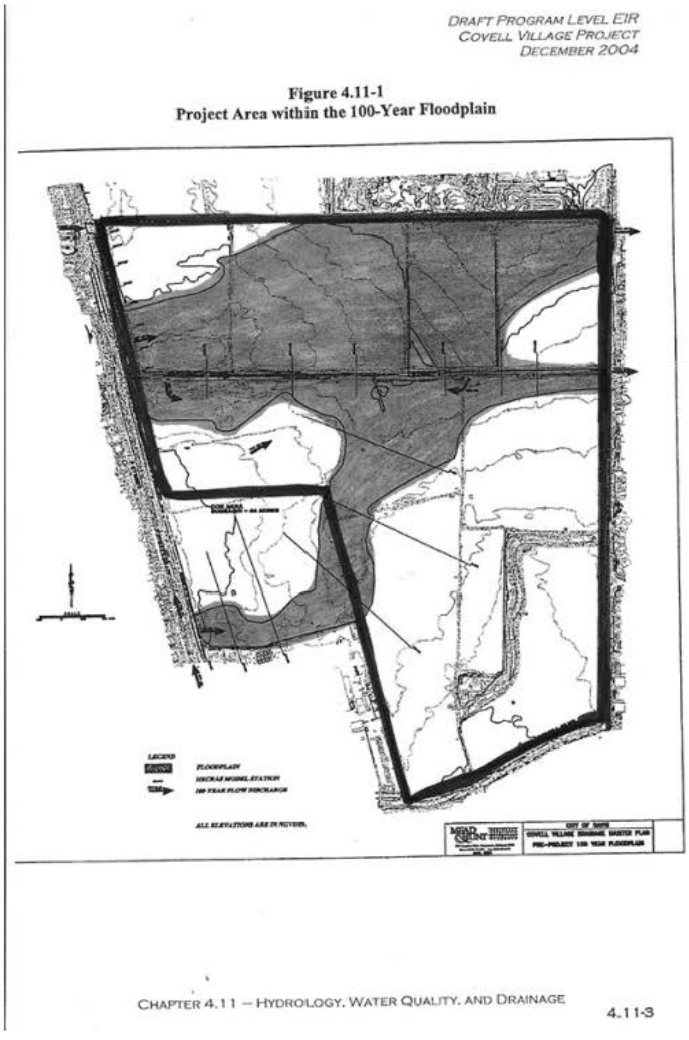
density of housing without a robust transit system would only exacerbate environment impacts by increasing traffic.

Flood plain

The enormous Village Farms flood plain is a FEMA Zone A Special Flood Hazard Area. Building hundreds of housing units on roughly 200 acres of flood plain is a huge problem, since a fundamental planning principal is that you *do not* build on enormous flood plains like this.

This is not only because of climate-change issues, but because of state legislation where California will no longer financially bail out cities foolish enough to build on flood plains like this when flooding disaster happens. That is more likely now than ever, due to climate change.

78-48



The Covell Village DEIR map showing the 100-year flood plain (darker grey area).

Landfill toxics

The unlined Old City Landfill and Sewage Treatment Plant adjacent (north) to Village Farms has had a long history of toxics and other chemical contaminants leaking into the groundwater.

78-49 Landfills are supposed to have large "exclusionary zones" or at least a 1,000-foot buffer zone for health and safety reasons. Village Farms should *not* be building so close to the Old City Landfill and Sewage Treatment Plant.

The toxics leaking include PFAS "forever chemicals" and manganese exceeding maximum concentration levels (MCL) recently reported from monitoring wells. How many people will want to buy a home of at least $700,000 to over $1 million sitting on land with contaminated groundwater with chemicals in high levels that cause cancer?

Soil toxics

78-50 The 118-acre Urban Ag Transition Aera is adjacent (west) to the Old City Landfill and the soil has arsenic levels that are 50 to 70 times what residential soil should have. The developers want use this soil as a "dig-pit" for filling the enormous 200-acre flood plain. The Heritage Oak Park site has toxics in the soil with toxaphene as high as 1,200,000 mg/kg and lead at 93 mg/kg, both exceeding maximum DTSC levels.

Re-routing Channel A

78-51 Trying to move and re-route the massive amount of runoff water currently being soaked up by over 400-acres of farmland could result in disastrous flooding. This includes the possibility of contaminated groundwater mixing with channel runoff, which then flows east through Wildhorse and potentially polluting the wetlands — a catastrophic scenario. Would expensive flood insurance be required of North Davis residents due to Village Farms?

Habitat impacts

78-52 The project would tear out 952 number of trees to expand and reroute Channel A which will have significant impacts on the habitat, particularly rare and endangered species, and raises major concerns about potential flooding.

Access issues

78-53 Serious access issues include no bicycle/pedestrian access via F Street because of the railroad tracks. The DEIR refers to the questionable "feasibility" of a Pole Line Road undercrossing due to existing infrastructure issues, so there may not be a Pole Line bicycle/pedestrian undercrossing crossing, either.

Even if feasible, the developer has indicated that he would not cover the entire cost, although his project is driving the need for it. Further, this 1,800-unit project would use an enormous amount of water and wastewater treatment capacity and city services. These infrastructure costs would fall on Davis residents.

Unneeded fire station

78-54 The additional fire station being proposed is not needed because roughly 90% of the fire department calls are medical, *not* fire-related issues. An emergency medical service would make much more sense and cost far less.

Letter 78 Cont.

78-54 Cont.

Building a new fire station would cost *at least* $14 million to build, and many millions of dollars more for additional staffing (including fire fighters), equipment and operational costs long-term.

Also, how could a fire truck possibly get onto Covell Boulevard (especially going east) when the traffic is backed up most of the time?

78-55

Unaffordable housing

The average home would be at least $700,000-$800,00 according to a project representative, but the high-end homes would be far more expensive.

EIR inadequacy

78-56

The DEIR is seriously flawed for many reasons, including lacking important information like the undercrossing uncertainty, and dismissive conclusions. It also fails to comply with CEQA requirements for EIR's to include alternatives that create *less* impacts. Yet, *all* of the alternatives are 1,800 housing units *or more,* with the exception of the "No project" and the 1,395-housing unit original proposal with the same layout as the 1,800-housing unit Proposed Project version.

The City Council could have included a citizen-based recommendation for a down-sized "build below the channel" alternative, but they completely ignored it. The DEIR should have included analyzing building only below Channel A, preserving the vernal pools and reducing the housing units to a reasonable number. This design avoids the bulk of the flood plain, and moves housing much further away from the Old City Landfill and Sewage Treatment Plant toxics leakage.

78-57

In summary, it is important to submit comments and concerns about the Village Farms project and its DEIR before the 5 p.m. Feb. 25 deadline to city staff member Dara Dungworth at ddungworth@cityofdavis.org.

The 1,800-unit 497 acre Village Farms project is too big, has far too many impacts and costs, has predominately unaffordable housing and is simply bad planning. Furthermore, this project would present potential city liability issues regarding toxics, flooding and public safety issues.

Residents concerned about Village Farms project, can contact Citizens for Responsible Planning group at citizens@dcn.org.

— Eileen Samitz is a former Davis Planning Commissioner and served on the city of Davis 2001 General Plan Update land-use committee and the subsequent Housing Element Update Committee.

LETTER 78: EILEEN SAMITZ (LETTER 4 OF 6, 02/12/2025)

Response to Comment 78-1
The comment is introductory and provides an overview of the commenter's concerns, which are elaborated upon in the ensuing comments. Please see the following responses to comments.

Response to Comment 78-2
The comment is introductory and provides an overview of the commenter's concerns, which are elaborated upon in the ensuing comments. Please see the following responses to comments.

Response to Comment 78-3
Please see Master Responses 2 and 3.

Response to Comment 78-4
Please see Master Response 2.

Response to Comment 78-5
Please see Master Responses 2 and 6.

Response to Comment 78-6
Please see Master Response 2.

Response to Comment 78-7
Please see Master Responses 1 and 2.

Response to Comment 78-8
Please see Master Response 1.

Response to Comment 78-9
Please see Response to Comment 75-5.

Response to Comment 78-10
Please see Response to Comment 75-2.

Response to Comment 78-11
Please see Response to Comment 75-9.

Response to Comment 78-12
Please see Response to Comment 75-10.

Response to Comment 78-13
Please see Response to Comment 75-11.

Response to Comment 78-14
Please see Response to Comment 75-15.

Response to Comment 78-15
Please see Master Response 6.

Response to Comment 78-16
Please see Response to Comment 75-16.

Response to Comment 78-17
Please see Response to Comment 75-17.

Response to Comment 78-18
Please see Response to Comment 75-18.

Response to Comment 78-19
Please see Responses to Comments 75-20 and 75-21. In addition, the project would not impact methane gas levels in the landfill. Methane is created as organic materials in a landfill decompose. Methane gas generation in landfills decreases over time. Typically, very little is produced beyond 20 years after closure (Solid Waste Landfill Engineering and Design, McBean, Rovers and Farquhar, 1995. pg. 95-96). The Old Davis Landfill was closed in 1975, 50 years ago.

Response to Comment 78-20
Please see Response to Comment 75-22.

Response to Comment 78-21
Please see Response to Comment 75-22.

Response to Comment 78-22
Please see Response to Comment 75-23.

Response to Comment 78-23
Please see Responses to Comments 75-27 and 75-28.

Response to Comment 78-24
Please see Response to Comment 75-29.

Response to Comment 78-25
Please see Response to Comment 75-30.

Response to Comment 78-26
Please see Master Response 3.

Response to Comment 78-27
Please see Response to Comment 75-35.

Response to Comment 78-28
Please see Response to Comment 75-37.

Response to Comment 78-29
Please see Response to Comment 75-38.

Response to Comment 78-30
Please see Response to Comment 75-39.

Response to Comment 78-31
Please see Response to Comment 75-42.

Response to Comment 78-32
Please see Response to Comment 75-44.

Response to Comment 78-33
Please see Responses to Comments 75-45 and 75-46.

Response to Comment 78-34
Please see Response to Comment 75-46.

Response to Comment 78-35
Please see Response to Comment 75-48.

Response to Comment 78-36
Please see Response to Comment 75-50.

Response to Comment 78-37
Please see Response to Comment 75-51.

Response to Comment 78-38
Please see Response to Comment 75-52.

Response to Comment 78-39
Please see Responses to Comment 75-53.

Response to Comment 78-40
Please see Response to Comment 75-54.

Response to Comment 78-41
Please see Response to Comment 75-55.

Response to Comment 78-42
Please see Response to Comment 75-56.

Response to Comment 78-43
Please see Response to Comment 75-57.

Response to Comment 78-44
Please see Response to Comment 75-60.

Response to Comment 78-45
Please see Response to Comment 77-1.

Response to Comment 78-46
Please see Response to Comment 77-2.

Response to Comment 78-47
Please see Response to Comment 77-3.

Response to Comment 78-48
Please see Response to Comment 77-4.

Response to Comment 78-49
Please see Response to Comment 77-5.

Response to Comment 78-50
Please see Response to Comment 77-6.

Response to Comment 78-51
Please see Response to Comment 77-7.

Response to Comment 78-52
Please see Response to Comment 77-8.

Response to Comment 78-53
Please see Response to Comment 77-9.

Response to Comment 78-54
Please see Response to Comment 77-10.

Response to Comment 78-55
Please see Response to Comment 77-11.

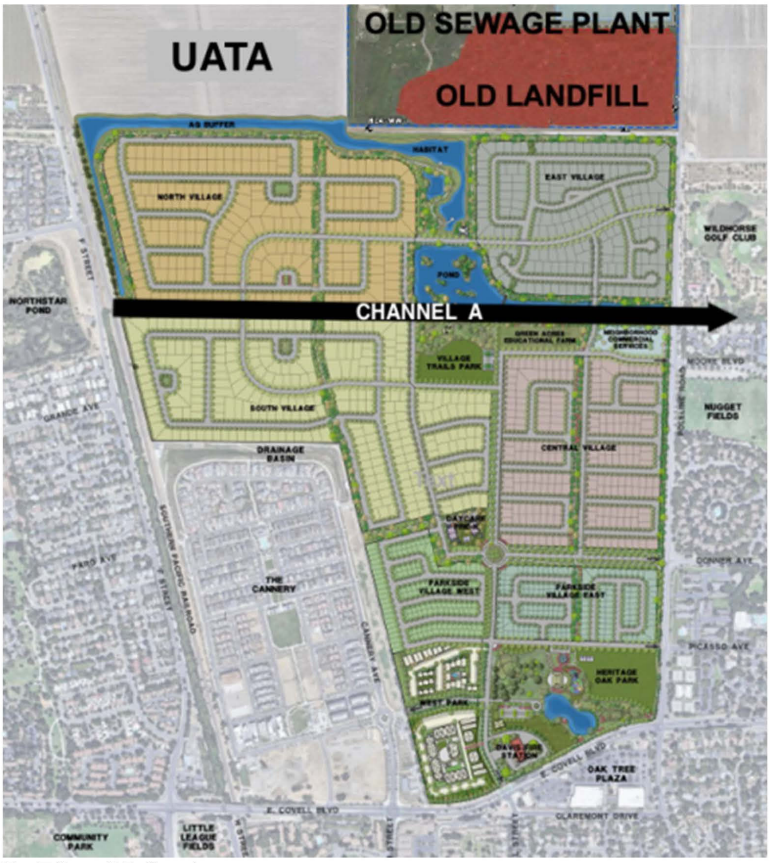
Response to Comment 78-56
Please see Response to Comment 77-12.

Response to Comment 78-57
Please see Response to Comment 77-12.

https://www.davisite.org/2025/02/planning-commission-and-majority-of-public-commentors-strongly-criticize-village-farms-project-and-d.html

Planning Commission and majority of public commentors strongly criticize Village Farms project and DEIR Part I

February 18, 2025



By Eileen M. Samitz

The Village Farms Draft Environmental Report (DEIR) was released roughly a month ago and is required by the California Environmental Quality Act (CEQA) law to circulate to allow public comments to be received in writing and verbally at public meetings. Last Wednesday, Feb. 12th the City of Davis Planning Commission meeting agenized comments and discussion from the planning commissioners, and allowed the public to voice their comments.

79-1

79-1 Cont.

The outcome of the meeting was that the planning commissioners expressed significant concerns and had much criticism of the Draft EIR as well as raised other issues regarding the project. Likewise, the majority of the more than 50 public commentors, both in person and by recorded voicemail, disapproved of the project for many reasons that have been pointed out before (see previous article link below.) However, a majority of the commissioners and some public commentors wanted to see an analysis of a "reduced footprint" alternative, similar to one included in the Covell Village DEIR by the same consulting group.

Many of the issues and more have been raise in an earlier Op-ed:

https://www.davisite.org/2025/02/title-village-farms-deir-is-inadequate-project-would-bring-massive-impacts-and-costs.html

Part I of this article provides some relevant Planning Commissioner comments focused on the DEIR and other Village Farms project issues. Part II of the article will follow tomorrow which reflects comments made by many public commenters with concerns about the Village Farms project and the DEIR.

Planning Commissioner comments

79-2

Chair Michelle Weiss raised the issues of the need for grade-separated crossings for the project for the safety of bicyclists and pedestrians. She expressed concern for the destruction of 952 trees planned to be removed was *a lot* of trees to lose.

Commissioner Vince McLaughlin made clear that there needed to be analysis of a "reduced footprint" alternative. He also expressed the need for the DEIR to address the issues raised by the Cannery neighbors.

Commissioner Alan Bennett expressed support for analysis of a reduced footprint alternative as well.

79-3

Commissioner Georgina Valencia expressed concerns about the lack of safe bicycle and pedestrian access to the project. She also said that the DEIR was deficient in having a stormwater analysis.

Commissioner Catherine Brinkley also reiterated the need for analysis of a reduced footprint alternative.

79-4

Commissioner Johannes Troost had great concern about the traffic impacts and questioned the road lane capacities and how was circulation supposed to work at Covell Blvd. and Pole Line Rd.? He asked what the DEIR solutions were to these traffic impacts in an area that was already dangerous to bicyclists and pedestrians?

Commissioner Rowe had the most critical comments including the many inadequacies of the DEIR that he included in 41 pages if comments and concerns he submitted regarding the DEIR. But he also stated that a "reduced acreage" alternative analysis should have been included

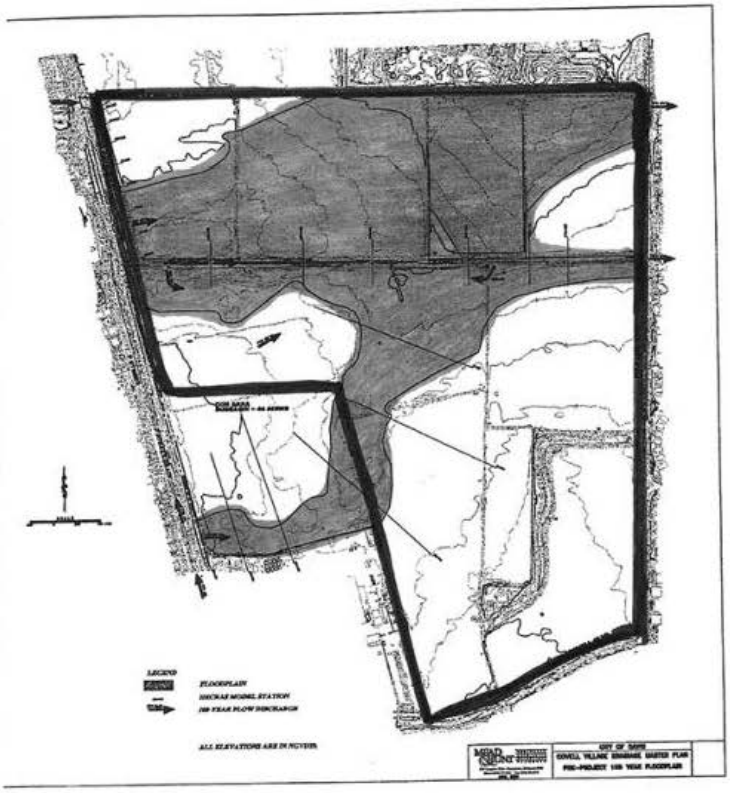
79-5

Letter 79 Cont.

79-5 Cont.

particularly since it was the "Environmentally Superior" alternative from the Covell Village DEIR. He explained the reasons including to avoid building on the enormous flood plain and getting the housing far away from the unlined Old City Landfill and Sewage Treatment Plant leaking toxics and other chemical contaminants.

Figure 4.11-1
Project Area within the 100-Year Floodplain



79-6

"If we were voting tonight to certify the EIR, I could not do that." That was the unequivocal statement from Greg Rowe during a recent Planning Commission hearing, where he raised serious concerns about the Environmental Impact Report (EIR) for Village Farms. He said there were many things in this Draft EIR that deviated from standards of practice. He criticized the Alternatives Analysis of the Village Farms DEIR as fundamentally flawed and felt that the City essentially chose housing unit counts to meet a pre-determined Vehicle Miles Traveled (VMT) target. He pointed out that with one DEIR alternative included, the City incrementally increased the project's intensity until it reached 2,700 units—50% larger than the original proposal. According to Rowe, this directly contradicts CEQA's intent to develop alternatives that reduce environmental impacts, not escalate them.

79-7

Rowe also criticized the City's failure to include the "Reduced Acreage" Alternative in the DEIR alternatives analysis which was previously identified in the 2004 Covell Village EIR as the environmentally superior option. That alternative, which proposed 1,500 units which was rather high, but it significantly reduced environmental impacts regarding the landfill, traffic, and biological resources. However, the reduced footprint was ignored by the City in favor of high-density proposals. He called this omission a corruption of the process.

79-8

Bicycle and pedestrian safety was another major concern. As an experienced cyclist, Rowe described the Covell Blvd. and Pole Line Rd. intersection as dangerously unsafe and rejected the EIR's reliance on superficial mitigations like signage and striping as inadequate. The EIR commits to grade-separated crossings (i.e. undercrossings or overcrossings) but lacks financial guarantees and a clear timeline, raising concerns that these crossings may never materialize. Without them, he warned, the project poses a direct safety risk to the hundreds of students who would rely on them for daily commutes.

79-9

Rowe also criticized the EIR's VMT assumptions, arguing that they ignore real-world commuting behavior. The claim that Village Farms would house UC Davis commuters fails to account for two-income households, where one partner's job may still anchor the family outside Davis. Instead of reducing traffic, the project would simply shift congestion elsewhere.

79-10

Ultimately, Rowe stated that could not support the DEIR, stating that it fails to evaluate appropriate alternatives, relies on unrealistic transportation assumptions, and omits critical safety measures. He warned that the project, as proposed, would exacerbate congestion, create serious safety risks, and impose unacceptable environmental costs.

79-11

The comments and discussion by the Planning Commissioners made clear that the Village Farms DEIR was inadequate and that there was a plethora of missing information and details. It is evident that the Village Farms DEIR has been rushed to accommodate the developers wishes to get to a Measure J/R/D vote quickly.

The other important commissioner commentary was that the majority of the planning commissioners agreed that a reduced footprint analysis should have included in the DEIR. What was not discussed was that there would need to be two modifications of the previous reduced acreage alternative, including preserve the vernal pools and downsizing the number of units significantly for the remaining 200 acres to maybe 900-1,000 units or less.

In summary, the Planning Commission overall had strong criticism of the Village Farms DEIR due to the many inadequacies of information missing from the document. In addition, a majority of the commissioners agreed that the DEIR needed to include an analysis of a smaller footprint alternative of building only below the channel downsizing the project. This alternative was included in the Covell Village project DEIR done by the same consultants (Raney) which Commissioner Rowe elaborated on in detail. This alternative would avoid building on the enormous 200-acre flood plain bringing flooding risks, and distancing the housing away from the toxics and other chemical contaminants from the unlined Old City Landfill and Sewage Treatment Plant and downsizing the number of housing units to a reasonable number to help reduce the traffic impacts.

79-12

The deadline for submitting comments for the Village farms Draft EIR is coming up soon. Residents with concerns regarding the Village Farms project and it DEIR are encouraged to submit their comments within the next few days before Tuesday, Feb. 25th by emailing City Staff member Dara Dungworth at *ddungworth@cityofdavis.org* The City weblink to the DEIR is at https://www.cityofdavis.org/city-hall/community-development/development-projects/village-farms-davis where you then click on the CEQA section.

Davis citizens concerned about the Village Farms project can contact Citizens for Responsible Planning at *citizens@dcn.org* for more information.

— Eileen Samitz is a former Davis Planning Commissioner and served on the city of Davis 2001 General Plan Update land-use committee and the subsequent Housing Element Update Committee.

LETTER 79: EILEEN SAMITZ (LETTER 5 OF 6, 02/18/2025)

Response to Comment 79-1
Please see Master Responses 1 and 2 and responses to Letter 77.

Response to Comment 79-2
Please see Master Responses 6 and 7.

Response to Comment 79-3
Please see Master Responses 2 and 5. Regarding the stormwater portion of the comment, please see Response to Comment 97-7.

Response to Comment 79-4
Please see Master Response 5.

Response to Comment 79-5
Please see Master Response 2 and responses to Letters 96 through 102.

Response to Comment 79-6
Please see Master Responses 1 and 2.

Response to Comment 79-7
Please see Master Response 2.

Response to Comment 79-8
Please see Response to Comment 97-52.

Response to Comment 79-9
Please see Master Response 5.

Response to Comment 79-10
Please see Master Response 1.

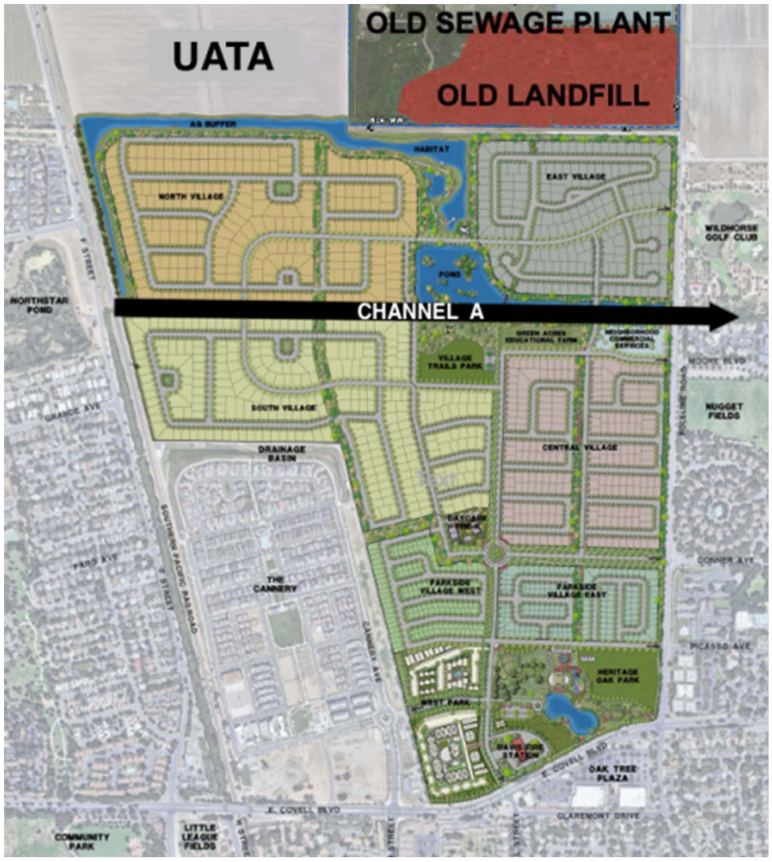
Response to Comment 79-11
Please see Master Responses 1 and 2.

Response to Comment 79-12
Please see Master Responses 1 and 2.

https://www.davisite.org/2025/02/planning-commission-and-majority-of-public-commentors-strongly-criticize-village-farms-project-and-deir-part-ii-public-commen.html

Planning Commission and majority of public commentors strongly criticize Village Farms project and DEIR Part II Public Comments of concerns and issues regarding the Village Farm project and its DEIR

February 19, 2025



80-1

By Eileen M. Samitz

The Village Farms Draft Environmental Report (DEIR) was released roughly a month ago and the deadline for public comment is coming up soon on Tuesday Feb. 25th at 5pm. It

Letter 80 Cont.

is important to submit your comments and any concerns now to City Staff member Dara Dungworth at *ddungworth@cityofdavis.org*. The City weblink to the DEIR is at https://www.cityofdavis.org/city-hall/community-development/development-projects/village-farms-davis where you then click on the CEQA section.

80-1 Cont.

The Planning Commission held a meeting to hear comments from the commissioners and the public on the Village Farms DEIR on February 12th at Community Chambers. The outcome of the meeting was that the planning commissioners expressed many concerns and about the inadequacies of the Draft EIR. Likewise, the majority of the more than 50 public commentors pointed out inadequacies of the DEIR and rejected the project for many reasons that have been raised before. (See weblinksbelow.) A majority of the commissioners and some public commentors also asked for an analysis of a "reduced footprint" alternative of a downsized project to be added to the DEIR, similar to one included in the Covell Village DEIR by the same consulting group.

80-2

Many of the Village Farms issues and problems have been raise in an earlier Op-ed: https://www.davisite.org/2025/02/title-village-farms-deir-is-inadequate-project-would-bring-massive-impacts-and-costs.html

80-3

Yesterday, Part I of this article covered a number of the Planning Commissioners comments: https://www.davisite.org/2025/02/planning-commission-and-majority-of-public-commentors-strongly-criticize-village-farms-project-and-d.html

The following is a summary of the numerous Village Farms issues, followed by some of the comments from Davis residents with concerns about the project and its Draft DEIR voiced at the Planning Commission meeting.

80-4

Many Village Farms concerns and issues

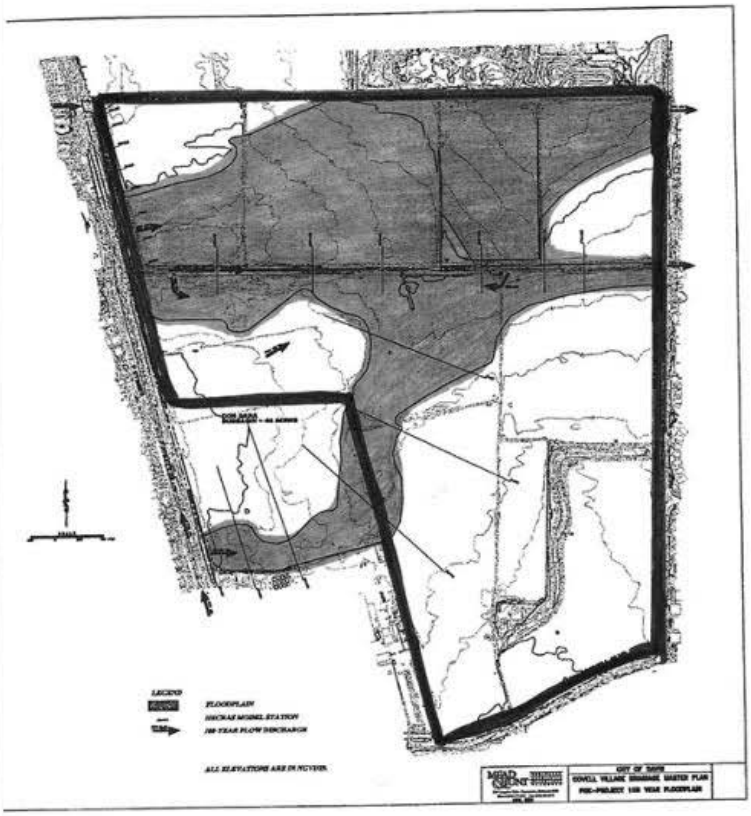
- Village Farms is the largest project ever proposed in Davis for 1,800 housing units on almost 500 acres, but it has the same problems, and more, as its predecessor Covell Village that was voted down 60:40 by a Measure J vote in 2005.

- the 200-acre flood plain and the fundamental planning principle that housing *should not* be built on an enormous flood plain like this due to flooding risks, particularly a massive amount of housing and the added issue of climate change. This is a FEMA Zone A, a Special Flood Hazard Area (SFHA).

Letter 80 Cont.

80-4 Cont.

Figure 4.11-1
Project Area within the 100-Year Floodplain



80-5 -the toxics and chemical contaminants including PFAS carcinogenic "forever chemicals" and high levels of manganese also exceeding MCL's coming from the adjacent *unlined* Old City landfill and Sewage Treatment Plant into the groundwater.

80-6 -soil toxics including toxaphene and lead in high levels in the area where the large Heritage Oak Park is to be located.

80-7 -lack of safe access issues for bicyclists and pedestrians including the possibility that there would not be any grade-separated crossing. The DEIR states that is uncertainty about the "feasibility" of the Pole Line undercrossing. Village Farms has no access to the west because of the railroad tracks, no access from the north due to the Old City Landfill and Sewage Treatment Plant, and no ability for an underpass or overpass (south) at Covell Blvd. due to existing infrastructure. Now, in addition there is uncertainty of the feasibility of a Pole Line Rd. under-crossing to the east (likely also due to existing infrastructure.)

80-8 -traffic impacts are already enormous at Covell Blvd. and Pole Line Rd. and adding 1,800 housing units there would only exasperate the situation with gridlock. In turn the gridlock would impose health and safety impacts from idling car exhaust and particulate matter deteriorating air quality, and increase greenhouse gases.

80-9 -Vehicle Miles Traveled (VMT) is not a realistic metric to use for Davis. It makes the false assumption that higher density housing will result in more use of public transportation by the residents. This is a fallacy, particularly when Davis has an inadequate and inconvenient public transit system that is designed primarily to serve UC Davis needs, not the community's needs. The City has no plans to significantly expand its transit system, and furthermore you cannot expect or force people to use public transit to try to reduce car use.

80-10 -952 trees being cut down and the destruction of habitat for endangered species, and also that trees help control flooding since they draw on a large volume of water.
-inadequate protection of the vernal pools which have the endangered species of Vernal Pool Tadpole Shrimp and the very rare native plant species of Astragalus tener var. tener and Extriplex joaquinana.

80-11 -tearing up and re-routing Channel A destroying trees and habitat which also increases flooding potential, particularly to existing nearby neighborhoods such as Wildhorse. Will this increase flooding risk force north Davis residents to need to get flood insurance?

80-12 -risks of the carcinogenic PFAS "forever chemicals" contaminated groundwater mixing with the Channel A runoff water. This can occur since groundwater levels periodically rise from less groundwater being drawn down due to surface water use, and climate change is causing more frequent heavy rain events. The project plans to re-route the channel creating new deep sections, potentially allowing the contaminated groundwater to mix with the channel runoff water. In turn, this contaminated channel runoff would flow east through Wildhorse exposing those residents, and ultimately to the wetlands. It would be catastrophic if the wetlands were contaminated and other connecting waterways.

80-13 -traffic, road damage, and air pollution impacts from the need to move ONE MILLION CUBIC YARDS of UATA soil with high levels of arsenic to try to fill the massive 200-acre flood plain. This would take 100,000 dump trucks moving soil down Pole Line Rd., which was just re-paved. Imagine adding 100,000 dump truck trips to the already heavily impacted Pole Line Rd. traffic? Air quality would likely be impacted as well due to the soil dust from so many trucks moving his massive amount of high arsenic level soil.

80-14 -the 118-acre UATA (Urban Ag Transition Area) "dig pit" would result creating a huge crater-like 10' deep hole that could have runoff from the adjacent unlined Landfill and Sewage Treatment Plant collect in it and soak into the ground further contaminating the groundwater.

80-15 - unaffordable housing due to the majority of the Village Farms homes being at least $700,000 -$800,000 with a significant number of the homes costing over $1 million.

80-16 -liability to the City due to the risk of flooding and potential health impacts from the toxics and other chemical contaminants exposure to the public.

80-17 -enormous infrastructure costs including an un-needed new fire station that would cost Davis residents many millions to build, staff, equip, and operate long-term. Since 90% of the Fire Department calls are medical and only 10% are fire related, we don't need a new fire station. Instead, an emergency medical service is what makes far more sense and for a fraction of the cost. An emergency medical service would have such a small foot could be located almost anywhere in East Davis.

80-18 -the serious inadequacy of the Village Farms DEIR due to the absence of so much information and details needed, including the lack of sufficient alternatives with *lesser* impacts than the primary project proposal as CEQA requires. An analysis of a reduced footprint alternative developing only below the channel was needed as well, downsizing the number of units significantly and preserving the vernal pools. CEQA states that "***The Guidelines require that the number of alternatives be limited to those that would avoid or substantially lessen any of the significant effects of the project (Section 15126(d)(5).***"

Public commentors with major concerns and criticism of the Village Farms project and its DEIR

80-19 Nicholas Pinter, a Professor of Applied Geosciences and Wildhorse resident called in his comments regarding the potential flooding issues due to Village Farms and downstream to Wildhorse. " I have concerns about the design and impacts of the Village Farms project. My primary concern at this time is the effects of the project on downstream

Letter 80 Cont.

80-19 Cont.

hydrology. Having reviewed the draft environmental impact report (DEIR), I fear that this analysis, its hydraulic modeling, and other elements of the DEIR may significantly underestimate downstream hydrologic impacts. Potentially including significant additional flow volumes and higher water levels in the Wildhorse neighborhood and elsewhere. I recommend independent hydraulic modeling of the impacts of the Village Farms project.

The DEIR notes that mitigation efforts will be designed and implemented in the future, but no details are provided nor any specific timeline for the design or implementation of these mitigation measures. This is not acceptable. I recommend that the city of Davis and its residents insist on detailed engineering designs that prove full mitigation of downstream hydrologic impacts; mitigation to the standard recommended by the Association of State and Federal Flood Plain Managers (ASFPM) and others which requires *"zero adverse impacts."*

80-20

Last, and more broadly, the proposed Village Farms development involves large-scale relocation and reengineering of the current stream channel and flood plain system. This raises many additional questions and concerns. I leave you with a quote from ASFPM. *"Future developments should avoid high hazard and ecological sensitive areas. State and local government should guide development away from these areas by applying land use management techniques. This is the most effective way to minimize cumulative losses."*

80-21

Jim Flannigan explained how there was a glaring deficiency in the DEIR of a reduced footprint alternative analysis for the project to be located entirely below Channel A. This is to avoid building on the 200-acre flood plain and distance the housing far from the unlined Old City Landfill and Sewage Treatment Plant. He pointed out that the Yolo County Dept. of Community Service also recommended the DEIR analyzing this reduced footprint, as did he and other citizens during the only City Council meeting addressing the Village Farms DEIR alternatives in Dec. 2023.

80-22

Susan Rainer, an architect specializing in green planning, commented on the massive loss of trees and that tearing out 952 trees was ecocide. Also, that trees actually help prevent flooding by absorbing water, so removing them would contribute to flooding. She emphasized potential City liability due to toxics exposure the residents. She also stated her support for the DEIR analyzing a reduced footprint alternative.

80-23

Retired Cal Trans traffic engineer and former Planning Commissioner Dapo Okupe said that the idea of adding 1,800 at Covell Blvd. and Pole Line Rd. could not possibly work since we do not have the infrastructure to support the massive traffic resulting. He made clear that vehicle miles traveled (VMT) does *not* reflect the real impacts of traffic. (Note: This is

80-23 Cont. particularly true for Davis having such a minimal public transit system focused primarily on UCD needs, so car usage will not be significantly reduced as VMT assumes.)

80-24 David McGlocklin also raised his concerns about the loss of the 952 trees and the habitat impacts. He also spoke to the many impacts and costs that the project would bring and potential City liability. He supported the analysis of a reduced footprint alternative also.

80-25 Liz Reay stated that the project has already been voted down by the Davis voters and it has come back after 20 years to haunt us. She also said that the developer has had 20 years to figure this out but the many problems of the project have still not been resolved. She pointed out potential liability to the City regarding the toxics issues from the adjacent unlined Old City Landfill and Sewage Treatment Plant. Also, the possibility of home owners needing to get flood insurance due to flooding potential.

80-26 Chris Carter brought up how the project with all its impacts made no sense and as a bicyclist that more car traffic at Covell Blvd. and Pole Line Rd. would make those roads even more dangerous. He did not want to get killed trying to travel on his bike there.

80-27 Wildhorse resident Margie Longo, gave a detailed explanation of existing drainage conditions at Wildhorse and how the DEIR did *not* address the flooding potential that the Village Farms project would cause the Wildhorse neighborhood. She also supported the analysis of a smaller footprint alternative that was needed for the DEIR.
Cannery resident Andrew McElrone explained the many concerns that the Cannery neighbors had regarding the ability of the City to plan and oversee this project. The Cannery has had many problems with failed construction workmanship. There is much concern about the massive traffic impact that would funnel Village Farms traffic west through the Cannery's already impacted Cannery traffic circle.

80-28 Former Planning Commissioner Nancy Price explained the health impacts of carcinogenic PFAS "forever chemicals" leaking from the unlined Old City Landfill and Sewage Treatment Plant that needs to have a minimum of a 1,000 ft. buffer zone to distance the housing from the landfill.

80-29 Dr. Glen Holstein, a biodiversity specialist, commented on the inaccuracies of the DEIR on the habitat issues, and the fact that the mitigations were not sufficient to protect some of the rarest plants and invertebrate species in the world. He stated the need for better protection of these rare vernal pools on the Village Farms site and that he could not support the project.

80-30 Sharon Montooth emphasized the lack of safe access issues for bicyclists and pedestrians at the busy intersection of Covell Blvd. and Pole Line Rd. particularly for children. She had great concern about the loss of so many trees and impacts on the wildlife, particularly

Letter 80 Cont.

80-30 Cont. endangered species like the Swainson's Hawk. She also raised concern about the toxics from the unlined Old City Landfill and Sewage Treatment Plant.

80-31 Vijay Kumar, a professional civil engineer for 35 years, explained a stunning analogy that the estimated ONE MILLION CUBIC YARDS of soil that the project DEIR says it would need to move. This would be the equivalent of filling the Super Bowl Stadium with soil 600 feet high. He had never encountered a residential project professionally that had to move that much soil. (It is notable that this UATA "dig pit" soil has high levels of arsenic above MCL's to try to fill in the enormous 200-acre flood plain. This would likely cause air quality impacts as well from the soil dust.) He added that there is no reason to allow annexation of the UATA "dig pit" site.

80-32 Dave Bakay expressed that the project traffic impact predictions were unrealistic and how vehicle miles traveled (VMT) was not logical as a metric. It makes no sense to claim having 2,700 units is better for VMT than 1,800 to reduce impacts. He raised the lack of access to the project from the west and the north, and their related safety issues for kids especially. He supported analysis of a reduced footprint alternative.

80-33 John Keller emphasized the importance of CEQA and that climate change needs to be taken into account with our City planning.

80-34 Calli Garritson, a Cannery resident, called in her many concerns about the toxics, potential flooding, lack of safe access , the DJUSD's overly-optimistic assumptions that Village Farms would bring a significant number of school children. She was especially concerned about the street that Village Farms plans to put through to the Cannery traffic circle which would pave through the Cannery urban farm, and cause major traffic and safety issues.

80-35 La Buena Vida resident Roberta Stuart also called in her concerns that the traffic impacts from Village Farms would exacerbate an already excessively impacted roads (Pole Line Rd. and Covell Blvd.).

80-36 Judy Feldman of Covell Farms called in comments enumerating the many Village Farms impacts including concern about the toxics, flooding potential, access issues, the habitat impacts and that none of these impacts were being adequately addressed by the DEIR.

80-37 I attended, and also commented on many of the summarized issues (above) particularly the toxics, floodplain and flooding issues, traffic, and infrastructure issues and costs and the need for the DEIR to analyze a downsized version of the "Reduced Acreage Environmentally Superior Alternative" from the Covell Village Draft EIR of building only below the channel, with the modifications of preserving the vernal pools and downsizing the number of housing units significantly to a more reasonable number.

Letter 80 Cont.

80-37 Cont.

Summary

The comments from the Planning Commission and the majority of the public commentors were clear, that the Village Farms project proposal has a plethora of problems which are not addressed adequately by the DEIR. The DEIR was rushed to accommodate the developer's desire to get his project to a Measure J/R/D vote quickly. Village Farms has all the same problems and more, than its predecessor Covell Village which is why the project was rejected by Davis residents.

The fact is, the Village Farms site is seriously handicapped site with a massive 200-acre flood plain and flooding risks, significant toxics issues including PFAS carcinogenic "forever chemicals" leaking from the adjacent unlined Old City Landfill and Sewage Treatment Plant, habitat destruction, enormous infrastructure costs, lack of safe access for bicyclists and pedestrians due to existing infrastructure impeding the ability to add undercrossings or overcrossings, massive traffic that would exacerbate the already heavily impacted Covell Blvd. and Pole Line Rd. roads by adding 1,800 units and in turn the gridlock of idling cars exhaust would impose health and safety impacts, and the majority of the project having unaffordable housing for the incomes of average local workers and families.

For residents with concerns regarding the Village Farms project, please submit your DEIR comment before Tuesday, Feb. 25th at 5pm. For more information regarding the many Village Farms project issues, please contact Citizens for Responsible Planning at *citizens@dcn.org*.

— Eileen Samitz is a former Davis Planning Commissioner and served on the city of Davis 2001 General Plan Update land-use committee and the subsequent Housing Element Update Committee.

LETTER 80: EILEEN SAMITZ (LETTER 6 OF 6, 02/19/2025)

Response to Comment 80-1
Please see Master Responses 1 and 2.

Response to Comment 80-2
Please see responses to Letter 77.

Response to Comment 80-3
Please see responses to Letter 79.

Response to Comment 80-4
Please see Master Response 4.

Response to Comment 80-5
Please see Master Response 3.

Response to Comment 80-6
Please see Master Response 3.

Response to Comment 80-7
Please see Response to Comment 97-52.

Response to Comment 80-8
Please see Master Response 5 and Response to Comment 75-9.

Response to Comment 80-9
Please see Master Response 5 and Response to Comment 77-3.

Response to Comment 80-10
Please see Master Response 7.

Response to Comment 80-11
Please see Master Response 4.

Response to Comment 80-12
Please see Master Response 3.

Response to Comment 80-13
Please see Response to Comment 99-2.

Response to Comment 80-14
Please see Master Response 3.

Response to Comment 80-15
Please see Master Response 1.

Response to Comment 80-16
Please see Master Responses 3 and 4.

Response to Comment 80-17
Please see Response to Comment 75-51.

Response to Comment 80-18
Please see Master Response 2.

Response to Comment 80-19
Please see responses to Letter 168.

Response to Comment 80-20
Please see responses to Letter 168.

Response to Comment 80-21
Please see responses to Letters 114 and 115.

Response to Comment 80-22
Please see responses to Letter 200.

Response to Comment 80-23
Please see Master Response 5.

Response to Comment 80-24
Please see Master Responses 2 and 7.

Response to Comment 80-25
Please see responses to Letters 149 and 150.

Response to Comment 80-26
Please see Response to Comment 97-52.

Response to Comment 80-27
Please see responses to Letters 157 and 158.

Response to Comment 80-28
Please see responses to Letters 165 and 166.

Response to Comment 80-29
Please see responses to Letter 95.

Response to Comment 80-30
Please see Response to Comment 97-52.

Response to Comment 80-31
Please see responses to Letter 209.

Response to Comment 80-32
Please see responses to Letter 66.

Response to Comment 80-33
Please see responses to Letters 120 and 121.

Response to Comment 80-34
Please see responses to Letter 45.

Response to Comment 80-35
Please see Master Response 5.

Response to Comment 80-36
Please see responses to Letters 125 and 126.

Response to Comment 80-37
Please see Master Responses 2, 3, 4, 5, 6, and 7.

Letter 81

Dara Dungworth

From: Elizabeth Coolbrith <elizabeth.coolbrith@gmail.com>
Sent: Wednesday, February 12, 2025 6:42 AM
To: Dara Dungworth; Sherri Metzker; Planning Commission; Donna Neville
Cc: lucasF@yolocounty.org; Inder Khalsa; Rochelle Swanson; Ryan Chapman; Jennifer Donofrio
Subject: Public comment: village farms

Categories: VFD Comment

CAUTION: External email. Please verify sender before opening attachments or clicking on links.

Dear City of Davis staff,

I am writing in order to submit public comment in response to the Village Farms draft EIR.

81-1

I am a concerned Cannery resident and I do not believe that the Village Farms plans as drafted are safe, honest, or ethical to the Cannery community — particularly the idea of connecting through our farm to the Cannery traffic circle and to our very narrow roads, where are vulnerable elderly and children neighbors reside. Chief among my concerns are:

1. Material and adverse alteration to The Cannery Urban Farm;
2. Unacceptable traffic safety impacts to The Cannery neighborhood;
3. Disproportionate noise impacts to The Cannery neighborhood during and after project construction.

1. Unacceptable, material, and adverse alteration to The Cannery Urban Farm.

81-2

- We have previously noted a lack of candor from both the Village Farms developers and City staff with respect to the Village Farms plan, particularly as to whether the Village Farms developers plan to make material, adverse alterations to the existing Cannery Urban Agriculture Transition Area (UATA) and Cannery Urban Farm. The developers' intentions have now become clear via the Draft EIR—they do indeed plan to construct a road running right through the Cannery Urban Agriculture Transition Area and Cannery Farm, to connect the planned development to the Cannery Avenue / J Street corridor.
- Page 3-23 of the Raney Draft EIR erroneously states: "It should be noted that an existing UATA buffer is located adjacent to the Cannery Farm and Cannery subdivision and includes demonstration gardens, community space, and a drainage corridor along the Cannery frontage. The Proposed Project would not result in modifications to the existing UATA"
- Construction of a paved road through the UATA at the eastern edge of the Cannery neighborhood will clearly result in a material, adverse alteration of the UATA, thus resulting in significant, and likely ongoing disruption to the operation of the urban farm.
- As imagined, designed and built, The Cannery Urban Farm is an essential and integral feature of The Cannery. While the development of Village Farms could have presented a unique opportunity to expand The Cannery Farm and integrate it with Village Farms' own educational farm concept, the developers of Village Farms would apparently rather pave over The Cannery Farm.

2. Unacceptable traffic safety impacts to The Cannery neighborhood.

81-3

- The Cannery community will suffer disproportionate traffic safety impacts from the planned Village Farms development and the planned linkage of Village Farms with the Cannery via the unacceptable, material, and adverse alteration of the Cannery UATA and Cannery Urban Farm.
- While traffic congestion and level of service is outside the scope of the EIR process, it is nonetheless obvious to any astute local observer that the current and anticipated future design geometry of the intersection of East Covell Boulevard and L Street is, and would in all likelihood remain, inadequate to handle the volume of vehicle trips exiting Village Farms during peak morning hours and returning to Village Farms during peak

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afternoon and evening hours. If a road is built through The Cannery Urban Farm, we expect that a substantial majority of vehicle trips between Village Farms and destinations to the west (including U.C. Davis, and destinations accessible via Highway 113 and 1-80 West) will instead travel through Cannery neighborhood streets, creating significant and unacceptable traffic safety impacts for Cannery residents, notably for the many children and elderly residents of the neighborhood.

81-3 Cont.

· Unfortunately, the traffic study conducted by Fehr & Peers for Raney does little to reflect the truly grossly disproportionate traffic safety impacts which would be suffered by The Cannery due to a linkage to Village Farms. For insight here, we must instead turn to the noise study conducted by Saxelby Acoustics, which is in turn informed by a study made by the project traffic engineer, GHD Group. Unfortunately, GHD's detailed estimates of traffic volumes have not been made public as part of the EIR process.

· Per Saxelby, GHD estimates that the portion of Cannery Loop west of Cannery Avenue currently carries 970 average daily trips, and expects that the Village Farms project will more than double average daily trips to 2,000; on a cumulative plus project basis, GHD expects that average daily trips along the southern edge of Cannery Loop would approximately quadruple over time to 4,200, roughly equivalent to the level of vehicular traffic currently seen on secondary arterial roads such as L Street and J Street. Based on the sheer scale of the Village Farms development plan and Fehr's estimates of total trip volumes from Village Farms, we believe that total trips exiting the Cannery during peak morning and afternoon/evening periods via Market Street and Cannery Avenue could increase by anywhere from 200% to 400% immediately following the development of Village Farms, without consideration of further cumulative development impacts over time.

81-4

· Additionally, we note that while Raney concluded that "Higher Number of Units - Same Footprint" (HNU) alternative would result in lower VMT per capita, Raney appears not to have subjected the HNU alternative to a rigorous analysis of total VMT or vehicle trips. While automobile modal share would likely decline under the HNU alternative, we believe that traffic safety impacts to the Cannery could be even greater under this alternative.

81-5

· We emphasize that our concern is not solely with potential increases in traffic congestion of potential changes in the level of service. Instead, our concern is that the introduction of a step change increase in commuter traffic volumes to neighborhood streets presents an unacceptable risk to resident safety. Our concerns are heightened by the already significant traffic safety issues presented by the design of the Cannery, including inadequate traffic calming infrastructure and the very serious risks presented by the southwest Cannery Loop elbow. While we applaud the proposed mitigation at the southwest Cannery Loop elbow, we believe this crossing will remain intrinsically dangerous for bicyclists and pedestrians, and that Village Farms bicyclists should be encouraged to utilize safer routes, including the path immediately north of East Covell Boulevard, and the proposed linkage to the Cannery bike path at the northeast corner of The Cannery.

3. Disproportionate noise impacts to The Cannery neighborhood.

81-6

· From our review of the Draft EIR, it is clear that the most significant increase in traffic noise due to the Village Farms development will be experienced within The Cannery, due to the disproportionately large increase in anticipate traffic volumes on Cannery neighborhood streets.

· The developers and our City leaders should justify why such a large increase in traffic and noise is justifiable given the planned project's adjacency to major arterial roads including Pole Line Road and East Covell Boulevard, and L Street, a secondary arterial road.

· While we defer to the expertise of Saxelby Acoustics, we note that their analysis relies heavily on estimates produced by the project's traffic engineer, GHD Group. In the interests of transparency, the City should seek to include any traffic plan, study or analysis created by GHD as part of the public EIR process.

With sincere concern,

Elizabeth and Robert Coolbrith

Sent from my iPhone

LETTER 81: ELIZABETH AND ROBERT COOLBRITH

Response to Comment 81-1
The comment is introductory and provides an overview of specific concerns that are addressed in the following responses.

Response to Comment 81-2
Please see Responses to Comments 17-2 and 17-3.

Response to Comment 81-3
Please see Responses to Comments 17-4 through 17-6.

Response to Comment 81-4
Please see Response to Comment 17-6.

Response to Comment 81-5
Please see Response to Comment 17-7.

Response to Comment 81-6
Please see Responses to Comments 17-8 and 17-9.

Letter 82

Dara Dungworth

From: Ellen Kolarik <ellenkolarik@gmail.com>
Sent: Wednesday, February 12, 2025 3:17 PM
To: Planning Commission
Subject: Statement for planning commission session on village Farms 2/12/25
Attachments: statement planning commission 2-12-25.odt

Categories: VFD Comment

CAUTION: **External email. Please verify sender before opening attachments or clicking on links.**

Dear Planning Commission Members,

My name is Ellen Kolarik and I am co-chair of Interfaith Housing Justice Davis but my comments reflect my own position.

82-1 The Village Farms project will provide much needed housing in our community. The developer has committed to 20% affordable and is making an effort to provide at least a partial supply of attainable market rate homes for first time home buyers. This is good. However, my concern is that the housing shortage will push the price of even the smallest single family units to a level which is still not affordable for your typical teacher or individual in the workforce.

82-2 I am asking that the developer make a commitment to increase the # of for sale attached homes (duplexes, quads, town homes or whatever) while similarly reducing the # of single family detached homes. This would not only help hold down the price of this type of housing (since attached homes typically sell for less than attached), but also increase density which allows for more areas of open space for the neighborhood and increases the viability of transit routes through the developments to reduce reliance on individual car trips, that is Vehicle Miles Traveled.

82-3 In addition, I am asking that the developer increase the number of market rate apartments to include 3 and 4 bedroom options suitable for young families. This would again be done by further scaling back the # of single family units.

82-4 Furthermore, I suggest the developer move all of the high density housing to a location adjacent to Covell and shift the proposed open green space to the north side of the high density apartments. This would allow apartment dwellers to more easily walk or bike to the shopping plaza across Covell, again helping to reduce VMT.

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Letter 82 Cont.

82-5 Finally, I would like a commitment that the major arteries through the development be designed with a width which will accomodate a bus transport line through Village Farms. This would set the stage to creating a bus route that would ultimately run through all of the north of Covell developments which are currently on the table.

Thank you,

Ellen Kolarik

LETTER 82: ELLEN KOLARIK (LETTER 1 OF 2, 02/12/2025)

Response to Comment 82-1
Please see Master Response 1.

Response to Comment 82-2
Please see Master Response 1 related to non-CEQA comments, as economic concerns, including the prices of housing, are not under the scope of CEQA. In addition, see Master Response 2 related to alternatives, which include alternatives related to adjusting project density. Finally, please see Master Response 5 related to transportation and VMT.

Response to Comment 82-3
Please see Master Response 1.

Response to Comment 82-4
Please see Master Response 1.

Response to Comment 82-5
Potential impacts related to transit facilities were addressed under Impact 4.13-3 of the Draft EIR. Internal roadways would be designed consistent with City standards.

Letter 83

Dara Dungworth

From: Ellen Kolarik <ellenkolarik@gmail.com>
Sent: Thursday, February 20, 2025 8:15 AM
To: Dara Dungworth
Subject: Submission Comments Draft EIR Village Farms
Attachments: Draft EIR Village Farms -ek.pdf

Categories: VFD Comment

CAUTION: **External email. Please verify sender before opening attachments or clicking on links.**

My name is Ellen Kolarik and I am a resident of Davis, California. I am commenting on the Draft EIR for the Village Farms proposal. I have also attached my comments as a pdf.

83-1

1. Further research needs to be done on water flow. It is unclear from the current EIR how runoff from Village Farms will impact the Wildhorse development.

83-2

2. Further research needs to be done on leaching patterns from the former dump site which is adjacent to the Village Farms project. Everyone has a right to a living space free from toxic runoff.

3. Increased density alone does not reduce VMT. The density must be adjacent to public transit and major services to insure reduced dependence on cars. To this end, I believe the council should pressure the developer to:

83-3

a) Increase the number of market rate apartment complexes with a comparable reduction in the number of single family units. Floor plans should include 3 and 4 bedroom units suitable for families as well as smaller units.

b) Shift all the multifamily dwellings (both subsidized Affordable and market rate housing) to be adjacent to Covell by flipping the position of the park green space to the north side of the apartment complexes.

c) Commit to designing the thoroughfare immediately north of the multifamily dwellings to accommodate a bus transit line.

Together these 3 interventions increase density adjacent to services and decrease the distance to the bus line without increasing the number of units of the overall full plan.

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83-3 Cont.

4. While Davis has a shortage of housing at all price points, the housing shortage for low income and missing middle is particularly acute. City council should pressure the developer to increase the number of attached housing (often referred to as missing middle or affordable by design) with a comparable decrease in the number of single family units. Ideally, attached housing would be scattered throughout the development, but a focus just north of the transit line (proposed under 3c) would also help reduce car dependence for a population more likely to need public transit.

LETTER 83: ELLEN KOLARIK (LETTER 2 OF 2, 02/20/2025)

Response to Comment 83-1
Please see Master Response 4.

Response to Comment 83-2
Please see Master Response 3.

Response to Comment 83-3
Please see Response to Comments 82-2 and 82-5.

Letter 84

Dara Dungworth

From: William Sarouhan <b_sarouhan@yahoo.com>
Sent: Tuesday, February 25, 2025 9:13 AM
To: Dara Dungworth
Subject: Traffic insanity

Categories: VFD Comment

CAUTION: External email. Please verify sender before opening attachments or clicking on links.

84-1 Please examine very carefully the impact of all of the traffic from this project on Poleline and the small traffic circle in the Cannery, not to mention Covell. There is no way the present configuration can accommodate future car numbers.
Thank you
Erica Sarouhan

Yahoo Mail - Email Simplified

LETTER 84: ERICA SAROUHAN

Response to Comment 84-1

Please see Master Response 5.

Letter 85

Dara Dungworth

From: Eva Spiegel <evaspiegel@gmail.com>
Sent: Tuesday, February 11, 2025 11:41 AM
To: Dara Dungworth; Planning Commission
Subject: Village Farms DEIR

Categories: VFD Comment

CAUTION: **External email. Please verify sender before opening attachments or clicking on links.**

Dear City of Davis Planning Commission,

85-1

My family has called Davis home since 1979 and I am so fortunate that I was able to return as an adult and buy a house in the community I love. Raising my own son here has given me an even greater appreciation for the city. Someday after he's done with college, I hope he will have an opportunity to come back like I did and continue to grow his roots. However, in order for this dream to become reality, Davis needs more housing and that's why I support Village Farms' proposal to build 1800 new units.

The 1800 units proposed by Village Farms makes sense. It's the right number of units for the proposed location, includes options for a range of income levels, and helps the City of Davis reach its mandated RHNA numbers while keeping the character and ethos of our community. This smartly planned development is exactly what my hometown needs.

Thank you,
--
Eva R. Spiegel
Cell: 530-400-9068

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LETTER 85: EVA SPIEGEL

Response to Comment 85-1

Please see Master Response 1.

Letter 86

Dara Dungworth

From: Evan Jacobs <evanjacobs2006@gmail.com>
Sent: Thursday, February 13, 2025 9:19 AM
To: Thomas McNairn; Dara Dungworth
Subject: Support for Village Farms and Sweetbriar Townhomes

Categories: VFD Comment

CAUTION: **External email. Please verify sender before opening attachments or clicking on links.**

Dara and Thomas-

I hadn't given much thought to supporting Village Farms and Sweetbriar Townhomes until my elderly neighbors began leafleting the neighborhood with NIMBY flyers. I've had quite enough of this propaganda from self-absorbed boomers designed to preserve our community in amber, hurt local businesses and exclude students and low income residents from our neighborhoods.

Regarding the NIMBY propaganda about Village Farms - Davis is the safest community my family has ever lived in. Their statement about "adding more residents before addressing community safety" reads like a racist dog whistle. I have my own issues with the state of Davis roads and understand that growing our community and its businesses is the surest way to increase funding for our infrastructure and transit. "speeding e-bikes" is not a reason to slow down housing. I strained my eyes while rolling them reading about community health and pediatrics. My children have received excellent care at Sutter Davis for everything from the flu to broken bones and Sutter is completing a major expansion of their facilities. When my family needed more specialized care we've been lucky to be 25 minutes away from world class medical specialists at UC Davis and Shriners in Sacramento. Besides, what does a private hospital have to do with housing? The thoughtful answer is very little, it's a NIMBY boomer bait and switch. As always in our local NIMBY wars the alternatives posited are "moderation". Picking apart every single proposal and forcing them to be "moderated" or scrapped entirely is what has gotten our community and our state into a housing crisis in the first place.

86-1

The NIMBY note on Sweetbriar really infuriated me. It's one thing to be against a greenfield development of new homes, but it gives away their game when they simultaneously protest a smart infill development in our downtown core because of "parking". After all, "people need cars." Yes, since the dawn of time humans have relied on petro-carbon based transportation. There is plenty of handicapped parking in our town for residents that have mobility and accessibility issues. Otherwise take a bus, hop in a rideshare, peddle a cycle, speed downtown on your e-bike or just park a couple of blocks away and walk to downtown. Students drive our local small businesses and grow our tax base to fund city services and infrastructure – visit F street on a Saturday in August and again in October to see the positive impact of a thriving student community.

These projects reflect two different but complementary types of new housing development that are desperately needed. Please permit and support construction as quickly as possible.

Also, will someone please save a tree and teach these folks how to print double-sided?

Thank you,

Evan Jacobs

LETTER 86: EVAN JACOBS

Response to Comment 86-1

Please see Master Response 1.

Letter 87

Dara Dungworth

From: Fei Li <flcli@UCDAVIS.EDU>
Sent: Tuesday, February 25, 2025 3:17 PM
To: Dara Dungworth; Planning Commission; City Council Members
Subject: Village Farms proposal feedback

Categories: VFD Comment

CAUTION: **External email. Please verify sender before opening attachments or clicking on links.**

Hi there,

I'm writing about some concerning issues that the developer behind the Village Farms proposal presented during the info session I attended.

They claim that a majority of the medium density "starter" homes will be between 800 and 1200 sqft and start at $800k. With my most generous calculations, that comes to *at least* **$666.67/sqft** for a *starter* home.

To put that into perspective, what was a "starter" 1865 sqft townhouse in the Cannery recently sold for an outrageous $790k. That's $423.59/sqft.

87-1

The developers behind Village Farms are proposing a **57.4% *increase*** in the price of a starter home. As of right now there are 74 home listings in Davis, *each of which* cost less per square foot than anything at Village Farms. Some of them even have real backyards.

It's not just me, right? Does that sound insane to you too?

I grew up in Davis and now I'm raising a family here. I've seen it how it changed over the 35 years that I've called this place home. I support increasing the home buying options for Davis families. But even if we put all of the concerning findings from the EIR aside, this iteration of **Village Farms isn't the solution we need**.

Thank you for all of your work and consideration.

Fei Li

LETTER 87: FEI LI

Response to Comment 87-1

Please see Master Response 1.

Letter 88

Dara Dungworth

From: Fong He <danielhor30@hotmail.com>
Sent: Saturday, February 22, 2025 1:51 PM
To: Dara Dungworth
Subject: Concerns regarding the proposed Village Farms development

Categories: VFD Comment

CAUTION: **External email. Please verify sender before opening attachments or clicking on links.**

Dear Ms. Dungworth,

88-1 Hope this letter finds you well. We are a family living in North Cannery. I am writing to express our strong concerns regarding the proposed Village Farms development. While I understand the desire for economic growth and expansion, I firmly believe that this development will have negative implications for the community in several critical areas, particularly traffic safety, overcrowding, and the general quality of life for current residents.

88-2 First and foremost, traffic safety in this area is already a significant concern. The roads around the proposed development are narrow and often congested due to the many schools located nearby. The addition of this VAST amount of new housing will only exacerbate the situation, not to mention the proposed new road cutting through the Cannery community. Increased traffic volumes will put pedestrians, cyclists, and drivers at greater risk, especially in areas where schools and parks are located nearby. I urge the council to consider the safety of residents, particularly children and the elderly, who may be vulnerable in an environment where traffic hazards increase.

88-3 In addition to the safety concerns, I am worried about the effect this development will have on the population density in our city. Our community already faces overcrowding in certain areas, with public services like schools, healthcare, and parks stretched thin. This new development will undoubtedly increase demand for these services, which may lead to reduced quality of life for current residents. We should be taking proactive measures to ensure that all residents, both current and future, have access to high-quality services, rather than rushing to accommodate new development at the expense of these needs.

88-4 Moreover, I believe this development could significantly alter the character of our neighborhood. Many of us moved here because of the tranquil, low-density atmosphere, and the introduction of this HUGE-scale property development will dramatically change the dynamics. There is a real concern that this development will lead to increased noise, pollution, and a loss of the community charm that makes our city a special place to live.

88-5 Another critical factor is the environmental impact of this development. Increased construction and development are likely to lead to habitat destruction, loss of green space, and an increased carbon footprint. Our community has made strides in sustainability and environmental awareness, and I urge the council to carefully consider the long-term environmental consequences of such a project.

88-6 In light of these concerns, I respectfully ask the council to vote against this proposed development. While growth is essential for the city's progress, it should be pursued in a manner that ensures the well-being and safety of existing residents and preserves the community's character. I believe that thoughtful, sustainable

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88-6 Cont.

development plans that address traffic, infrastructure, environmental impact, and the quality of life for all residents will serve us much better in the long term.

Thank you for your time and consideration of this matter. I hope the council will make a decision that reflects the best interests of our community.

Sincerely,
He's family

LETTER 88: FONG HE

Response to Comment 88-1
Please see Master Responses 1 and 5.

Response to Comment 88-2
Please see Master Response 5 with respect to traffic safety.

Response to Comment 88-3
It should be noted that assessing impacts to quality of life is not within the scope of CEQA, which is focused on the potential physical environmental impacts associated with the construction of new or altered facilities required to maintain acceptable performance objectives. Please see Master Response 1 for further detail.

Such impacts are addressed in Chapter 4.12, Public Services and Recreation, of the Draft EIR. Although the Proposed Project/BRPA is anticipated to increase population and, thus, result in an associated increase in demand for public services, Impacts 4.12-3 and 4.12-4 both identified less-than-significant impacts related to schools and parks, respectively.

Response to Comment 88-4
Please see Master Response 1 with respect to community character. Potential impacts to noise and pollution are addressed respectively in Chapters 4.10, Noise, and 4.3, Air Quality, Greenhouse Gas Emissions, and Energy, of the Draft EIR.

Response to Comment 88-5
Please see Master Response 7. The environmental impacts of the Proposed Project and BRPA are evaluated throughout the Draft EIR.

Response to Comment 88-6
Please see Master Response 1.

Letter 89

I am writing regarding the Village Farms draft EIR.

Although we desperately need more housing in Davis, this development has too many flaws.

89-1 The footprint is enormous at almost 500 acres with 1800 units. There are not enough affordable homes, or apartments included in the plans. The last thing Davis needs is more $1 million single family homes. We need housing for students, for our workforce, for low-income seniors and other low-income people.

89-2 The location includes the Alkali Prairie Yolo Habitat Conservation Plan/Natural Community Conservation Plan south of Channel A. It is imperative that the Biological Resources Preservation Alternative be used should this development be built. We have so little natural habitat left in our area, especially vernal pools. There is no excuse to do anything but protect this land.

89-3 Part of the development will be built quite close to the old waste water treatment plant and a former landfill. There has to be an enormous amount of toxic contamination at these sites. There is no indication of a plan to prevent the toxins at these sites from seeping into the soil, and air, in neighborhoods where housing will be built. This situation needs to be addressed much more seriously.

This development should not be built at planned for the above reasons.

Gayna Lamb-Bang
4350 Cowell Blvd.
Davis, CA 95618

LETTER 89: GAYNA LAMB-BANG

Response to Comment 89-1
Please see Master Response 1.

Response to Comment 89-2
Please see Master Response 1.

Response to Comment 89-3
Please see Master Response 3.

Letter 90

Dara Dungworth

From: George Galamba <ggalamba@gmail.com>
Sent: Monday, January 20, 2025 4:38 PM
To: Dara Dungworth
Subject: Village Farms

CAUTION: **External email. Please verify sender before opening attachments or clicking on links.**

90-1 I am opposed to the Village Farms development. Pole Line Road and Covell Blvd. are already impacted by traffic during morning and afternoon rush hour. Continuing to add additional traffic with no improvement to the infrastructure is insane.

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LETTER 90: GEORGE GALAMBA

Response to Comment 90-1

Please see Master Response 5.

Letter 91

Dara Dungworth

From: Gerald McClain <lgmcclain@yahoo.com>
Sent: Tuesday, February 25, 2025 3:27 PM
To: Dara Dungworth
Subject: Comments regarding the upcoming Proposal for the Village Farms DEIR

Categories: VFD Comment

CAUTION: **External email. Please verify sender before opening attachments or clicking on links.**

91-1 I am a resident of Davis and have been for 65 Years. I reside also in East Davis. So we are again, for the 3rd. time, having to decide if John Whitcombe Tamdem Properties proposal to build Village Farms on 500 acres of good farm land is good for the citizens of Davis. After reading an "Excellent" Commentary in the Davis Enterprise (By Eileen Samitz) regarding the DEIR that was submitted to the City Council for consideration, I most definitely will vote NO, if the city council unwisely decides to put the project on the November ballot. The first two ballots that were presented in the past, were very poorly planned, but this new proposal is the worst. I talked with some of the homeowners in our area, and most were very concerned with the bad impact it would have on East side of town, as well as for other parts of our great city. We do not need a large, high density, over crowded TOWN, built and annexed into our city limits of Davis. This city has many serious problems that are not are not being addressed, because of lack of city funds, why should the city take on more problems of introducing a new TOWN to govern. As Eileen Samitz (former Davis Planning Commissioner) explained in her Enterprise Commentary, all of the problems she covered in each Category were well explained. Plus let us not forget that the city council will then have to raise taxes on all portions of our city utility bill each month, as they have been doing in past years to accommodate our growing population. For the present time, I believe the property should remain in the county until more thoughtful and beneficial projects can be submitted by the owners to the City of Davis. Respectfully submitted by a long time resident. Gerald McClain

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LETTER 91: GERALD MCCLAIN

Response to Comment 91-1

Please see Master Response 1.

Letter 92

Dara Dungworth

From: Gi Nam <gijungnam@berkeley.edu>
Sent: Wednesday, February 19, 2025 1:08 PM
To: Dara Dungworth
Subject: Re: Village Farms Draft Environmental Impact Report

Categories: VFD Comment

CAUTION: **External email. Please verify sender before opening attachments or clicking on links.**

Opposition to Village Farms Development Project

Dear City Council Members,

As a resident of the Cannery neighborhood, I am writing to express my strong opposition to the current version of the Village Farms Development Project. While I support responsible development that benefits our community, I cannot support a project that fails to adequately address critical environmental and traffic concerns.

92-1

The proposed development raises serious issues, particularly regarding flooding risks and increased traffic pollution. Without proper mitigation measures, this project could lead to long-term environmental harm and significantly impact the safety and quality of life for residents. The City Council has a responsibility to ensure that development is both sustainable and well-planned, and this proposal, as it stands, does not meet that standard.

I urge you to vote against this version of the Village Farms Development Project and require the necessary improvements to address these significant concerns before moving forward. Our community deserves a project that prioritizes responsible growth, environmental protection, and infrastructure planning.

Thank you for your time and consideration.

Sincerely,

Gi Nam

Resident of City of Davis

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LETTER 92: GI NAM

Response to Comment 92-1

Please see Master Response 1. With respect to traffic and flooding concerns, please see Master Responses 5 and 4, respectively.

Letter 93

Dara Dungworth

From: Ginga Strozyk <gingastrozyk@gmail.com>
Sent: Tuesday, February 11, 2025 11:12 PM
To: Planning Commission
Subject: opposition of Village Farms development project

Categories: VFD Comment

CAUTION: **External email. Please verify sender before opening attachments or clicking on links.**

Greetings. On behalf of myself and my mother, co owners of a condo unit on Donner Ave off of Poleline, I am once again voicing our complete opposition and concern for the proposed development project Village Farms. As has been stated before, here are a few reasons why...

93-1 Too much environmental impact

93-2 Too much traffic

93-3 Danger of flooding our existing homes!!

93-4 Dangerous toxins already in the land to be built on

Will cost us way too much

93-5 Also, the claims that these will be affordable homes are lies. They will be expensive McMansions that are unaffordable for the average families whom the developer claims he is catering to.

These are some questions we would like answered...

Who will take responsibility if flooding occurs to our homes due to negligent planning and development?

93-6 Who will take responsibility when people become sick because they bought a home built on toxic land?

What about the gridlock that the neighborhood will have to endure, causing a negative impact on day to day life? Do you have anything to say about that?

Sincerely,
Ginga Zeidenberg/Strozyk and Kinuko Yoshida

LETTER 93: GINGA STROZYK (LETTER 1 OF 2, 2/11/25)

Response to Comment 93-1
Please see Master Response 1.

Response to Comment 93-2
Please see Master Response 5.

Response to Comment 93-3
Please see Master Response 4.

Response to Comment 93-4
Please see Master Response 3.

Response to Comment 93-5
Please see Master Response 1.

Response to Comment 93-6
Please see Master Response 1, as well as Master Responses 3 through 5.

Letter 94

Dara Dungworth

From: Ginga Strozyk <gingastrozyk@gmail.com>
Sent: Sunday, February 23, 2025 4:09 PM
To: Dara Dungworth
Subject: Fwd: opposition of Village Farms development project (Resend)

Categories: VFD Comment

CAUTION: **External email. Please verify sender before opening attachments or clicking on links.**

Hello,

94-1 My name is Ginga Strozyk (Zeidenberg) and I am forwarding this email that I sent to the planning commission to you so that you are made aware of the deep concerns many people have w the Village Farms project. My mother lives in a condo unit that we co-own across the street on Donner Avenue. We are terribly concerned about flooding that could occur by building on the flood plain. I grew up in Davis, and I remember two particular times where Covell was completely flooded near Poleline when I was a kid. Flooding is not our only concern, as you will see in the forwarded email. The Village Farms project is far too dangerous to be allowed to happen. Please reconsider.
Ginga Strozyk (Zeidenberg)
Sent from my iPhone

Begin forwarded message:

From: Ginga Strozyk <gingastrozyk@gmail.com>
Date: February 11, 2025 at 9:11:49 PM HST
To: PlanningCommission@cityofdavis.org
Subject: opposition of Village Farms development project

94-2 Greetings. On behalf of myself and my mother, co owners of a condo unit on Donner Ave off of Poleline, I am once again voicing our complete opposition and concern for the proposed development project Village Farms. As has been stated before, here are a few reasons why...
Too much environmental impact
Too much traffic
Danger of flooding our existing homes!!
Dangerous toxins already in the land to be built on
Will cost us way too much
Also, the claims that these will be affordable homes are lies. They will be expensive McMansions that are unaffordable for the average families whom the developer claims he is catering to.
These are some questions we would like answered...
Who will take responsibility if flooding occurs to our homes due to negligent planning and development?
Who will take responsibility when people become sick because they bought a home built on toxic land?
What about the gridlock that the neighborhood will have to endure, causing a negative impact on day to day life? Do you have anything to say about that?
Sincerely,
Ginga Zeidenberg/Strozyk and Kinuko Yoshida

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LETTER 94: GINGA STROZYK (LETTER 2 OF 2, 02/23/25)

Response to Comment 94-1

Please see Master Response 1. With respect to flooding, please see Master Response 4.

Response to Comment 94-2

Please see Response to Comments 93-1 through 93-6.

Comments on Village Farms Davis Project Draft Environmental Impact Report

By Glen Holstein, PhD

Tuleyome Senior Board Member

Since receiving a doctorate from UC Davis with research on how climate shapes global vegetation, I have been an expert consultant on vegetation and biodiversity with work that includes writing the award-winning Yolo Conservation Plan's vegetation section and teaching classes on California biodiversity.

Biodiversity is the number of different kinds of living things from animals and plants to mushrooms and kelp present in an area. It is not evenly distributed, and places where it is unusually high are called biodiversity hot spots. Many of these are in the tropics but they also include mediterranean climate zones in more temperate areas. Since North America's mediterranean climate region is centered in California, its biodiversity is particularly high among states. For example, our state's biodiversity is number one in plants, mammals, and plants + vertebrates. Endemic biodiversity is also significant and includes those species confined to a single area. California is number one in endemic biodiversity for plants, all vertebrates, mammals, amphibians, freshwater fish, and plants + vertebrates (Stein, et al. 2000).

95-1

Inside California, however, biodiversity is not equally preserved. Its great Central Valley, for example, is rated by the World Wildlife Fund as one of the most critically endangered ecoregions in North America and one of the few with no remaining intact habitat (Ricketts, et al. 1999) because it has been almost entirely converted to irrigated agriculture and urbanization. Consequently, it is the California ecoregion with the greatest plant extinction (Skinner & Pavlik 1994). If there are any places in the Central Valley where natural habitat survives contrary to the World Wildlife Fund and especially if they constitute biodiversity hot spots, it is critical for conservation at the global scale that they be carefully preserved because of their great rarity. The area called "Village Farms" is such a place.

One of the species this EIR documents as significantly present in the Village Farms area is the Federally-Listed Endangered Animal Species Vernal Pool Tadpole Shrimp (*Lepidurus packardi*), which is the highest level of protection any species

95-2

95-2 Cont.

can receive in the United States. The species, despite being a crustacean, is similar in size and appearance to an amphibian tadpole, hence its name. When it was federally listed in 2003 it was known from 18 populations, all of which are in the Central Valley. Consequently, it is endemic not only to California but also to its Central Valley, which is identified by the World Wildlife Fund as one of North America's most endangered ecoregions. The United States Fish and Wildlife Service identified needed critical habitat for each of these 18 populations, and the average size of these designated critical habitat areas is 25, 528 acres (USFWS 2003). The smallest of these designated critical habitat areas at 440 acres, however, is the only one located in Yolo County and is at its Grasslands Park. Now a nineteenth population found and confirmed by the Village Farms EIR is also in Yolo County and deserves as great an area of protection as the otherwise smallest area of protection, the 440 acres at Grasslands Park. The "preserved Natural Habitat Area" of 47.1 acres proposed in the "Biological Resources Preservation Alternative" of the EIR is obviously grossly inadequate by comparison. It would require the full 497.6 acres of the project to create an adequate and comparable protected Critical Habitat for this Federally-listed Endangered Animal Species. In the 110 pages of the EIR's Biological Resources section the Vernal Pool Tadpole Shrimp is only mentioned briefly on six pages despite its importance. These are pages 4.4-23, 4.4-38,39, and 4.4-69-71. The last three of these pages do not mention Vernal Pool Tadpole Shrimp's federal endangered species status and state that complete destruction of its habitat would have a "less-than-significant level" impact on the species, which is like saying they can cause sunrise at midnight. The latter is part of a 50-page part of the EIR's Biological Resources section extending from 4.4-57 to 4.4-107 stating that every biological impact of both versions of the project is "less than significant."

95-3

That Vernal Pool Tadpole Shrimp and other rare species discussed below were found and documented at the Village Farms site by field survey crews providing data for this EIR indicates that they did their job well. That is not the case for presumably other individuals who discussed this and other data while writing the EIR text. For example, in the Biological Resources Chapter's Page 4.4-4 a map identifies an area as "alkali prairie". The source given for this habitat type in the EIR text is the Yolo Habitat Conservation Plan/Natural Community Conservation

95-3 Cont.

Plan although this document is not included in the Biological Resources Chapter's Appendix bibliography. Since I personally wrote the habitat type parts of that document, I am quite familiar with their meaning. Alkali prairie is an upland entirely non-wetland habitat, but on Page 4.4-97 a map of the same area identified as the dry upland alkali prairie on the earlier map shows it consisting almost entirely of two wetland habitats, alkali playa and alkali wetland. While a better name for both would be clay pan vernal pool, what is most significant is that the EIR's maps are contradictory and significantly unreliable. Similarly, and bizarrely, on Page 4.4-2 the Village Farms site's landscape is described as "foothills" despite its location near the Central Valley's lowest point far from any hills. Another example of such careless writing is the claim that two trees, golden rain tree (*Koelreuteria)* and she-oak (*Casuarina*) are in the site's riparian vegetation despite their absence from the apparently complete inventory of such trees on pages 4.4-44 to 46.

95-4

The site is also a biodiversity hot spot because it provides habitat for some of the largest populations of very rare plants, those designated in CRPR 1-B, the highest rarity level in the agency-accepted California Native Plant Society Inventory of Rare and Endangered Plants of California, which is explained on the EIR's Pages 4.4-10 and 11. One of these 1-B plants the EIR surveys confirmed to be present at the site is Alkali Milk-Vetch (*Astragalus tener* var. *tener*), a beautiful violet-flowered herb endemic to clay pan vernal pools located between Sacramento and Oakland, an urbanization impacted limited range in which its remaining populations are rapidly being lost. The Village Farms EIR surveys, however, confirmed that 19,300 Alkali Milk-Vetch individuals are still present there, almost certainly one of its largest populations left in Yolo County, where many great previous losses are documented.

Another 1-B plant the EIR surveys documented at the site is San Joaquin Spearscale (*Extriplex joaquiniana*). Unlike Alkali Milk-Vetch, San Joaquin Spearscale is found in upland alkali prairie rather than wetland clay pan vernal pools. The surveys documented 20,900 individuals of this rare species, which is among its largest documented populations. The large populations of these two rare plant species documented at the Village Farms site by its EIR surveys confirm that it may be the most significant rare plant site remaining in Yolo County in

95-4 Cont.

addition to it being the first new locality for the federally-listed endangered Vernal Pool Tadpole Shrimp (*Lepidurus packardi*) found in over 20 years.

95-5

Other 1-B rare plants not documented by the Village Farms EIR surveys could potentially occur there since suitable habitat is present and there are historical records at or near the site. These are Heartscale (*Atriplex cordulata* var. *cordulata*), Brittlescale (*Atriplex depressa*), Heckard's Pepper-grass (*Lepidium latipes* var. *heckardii*), California Alkali Grass (*Puccinelia simplex*), and Saline Clover (*Trifolium hydrophilum*). Although the latter species was not recorded at the site by the EIR surveys, there is an anecdotal report by a local botanist unaffiliated with the EIR that it was recently seen there.

95-6

In addition to Vernal Pool Tadpole Shrimp, there are other special status animal species occurring at or near the Village Farms site. These include:

1. Monarch Butterfly (*Danaus Plexippus*) is proposed for federal listing as threatened, and while the EIR surveys did not record it at the site, they did find abundant populations of one of its host plants, Narrowleaf Milkweed (*Asclepias fascicularis*) at the site and documentation of the species very close by. Consequently, the EIR concluded it is likely to occur at the site.
2. Valley Elderberry Longhorn Beetle (*Desmocerus californicus dimorphus*) is federally listed as threatened and is a Yolo Habitat Conservation Plan covered species. Since this species has been historically recorded at or near the site and many of its Blue Elderberry (*Sambucus nigra* ssp. *caerulea*) host plants are present there, the EIR rightly concludes that the potential for this species to occur there is high. Since site conditions permit populations of its host plant to greatly increase, potential for the species to flourish there could also increase.
3. Burrowing Owl (*Athene cunicularia*) is a California Endangered Species listing candidate, a California Department of Fish and Wildlife Species of Special Concern, and a Yolo Habitat Conservation Plan covered species. Open habitat with numerous rodent burrows that is currently widespread at the Village Farms site is ideal habitat for this species and its presence adjacently is currently documented. Consequently, the EIR reasonably concluded that the potential for this species to occur there is high.

4. Swainson's Hawk (*Buteo swainsoni*) is listed as threatened by the California Department of Fish and Wildlife and is a Yolo Habitat Conservation Plan covered species. The Village Farms site's current condition of widespread open foraging habitat and numerous large nesting trees is ideal habitat for this species and the EIR surveys confirmed that this species currently widely and regularly uses this site.
5. Northern Harrier (*Circus cyaneus*) is a California Department of Fish and Wildlife Species of Special Concern for which the Village Farms current condition of widespread open landscapes provides ideal foraging habitat. The EIR surveys confirmed that this species' current use of the site for foraging is frequent.
6. White-tailed Kite (*Elanus leucurus*) is a California Department of Fish and Wildlife Fully Protected Species and a Yolo Habitat Conservation Plan covered species. As with Swainson's Hawk, the Village Farms current conditions of widespread open habitat for foraging and numerous potential nesting trees is currently ideal habitat for this species, and the EIR surveys confirmed that its current use of the site is regular and frequent.
7. Pallid Bat (*Antrozous pallidus*) is a California Department of Fish and Game Species of Special Concern and the Village Farms site's numerous old trees provide suitable roosting habitat. Since there are records of the species at or near the site, the EIR considers its potential to occur there as high along with Silver-haired Bat (*Lasionycteris noctivagans*) and Hoary Bat (*Lasiurus cinereus*), two species with lower protection status.
8. American Badger (*Taxidea taxus*) is a California Department of Fish and Wildlife Species of Special Concern. While the EIR considers its potential to occur in the study area low, that may not be definitive since the site's widespread open habitat with abundant rodent prey as well as a relatively recent record at the study area makes the low potential conclusion questionable.

95-6 Cont.

The EIR only considers the fraction of species at the Village Farms site with special status because of some level of protection, but even these demonstrate it is an island of remarkably high biodiversity that miraculously has survived adjacent to the city of Davis. Its widespread open areas, for example, provide foraging for Swainson's Hawk, Northern Harrier, White-tailed Kite, Burrowing Owl, and

95-6 Cont.

potentially American Badger as well as ground nesting habitat for Burrowing Owl and potentially American Badger. Its trees can provide nesting and roosting habitat for Swainson's Hawk, White-tailed Kite, and bats like Pallid Bat, Silver-haired Bat, and Hoary Bat. Host plants for Monarch Butterfly and Valley Elderberry Longhorn Beetle are present and flourishing at the site. And most significantly, its vernal pool and alkaline prairie complex supports significant populations of three of the world's rarest taxa, Vernal Pool Tadpole Shrimp, Alkali Milk-Vetch, and San Joaquin Spearscale.

95-7

Unfortunately, both the EIR's Proposed Project and Biological Resources Preservation Alternative call for removal of 952 of the site's 1,237 trees that the site's raptors and bats depend on for roosting and nesting (Page 4.4-103). In addition, significant numbers of host plants for Monarch Butterfly and Valley Elderberry Longhorn Beetle would also be lost (Pages 4.4-71-74).

95-8

The widespread open areas at the site used for foraging and ground nesting by numerous species would be essentially lost if either the Proposed Project or the Biological Resources Preservation Alternative were approved. Even the 118.4-acre Urban Agricultural Transition Area (UATA) would be excavated to a depth of 9 to 10 feet deep to provide fill so that the urbanized part of the project could be raised above the local floodplain (Page 3-21). Consequently, any biological values present in the UATA like raptor foraging habitat and burrows used by burrowing owls and a variety of mammals would be immediately destroyed by the excavation. Numerous aerial photographs of UATA like Figure 4.8-4 also clearly show an irregular pattern of color change typical of that resulting from water ponding, which suggests vernal pools may be present in the UATA that are ignored in the EIR. If that is the case, these would be another significant site feature that would be destroyed by the proposed UATA.

95-9

The stated reason for the fill need is a City of Davis Design Standard that structure pads need to be elevated at least one foot above the Base Flood Elevation but the final elevation will be determined by hydraulic modeling conducted for the project (Page 4.8-42). Pad elevation from fill derived from the UATA will also elevate pads above hazardously toxic groundwater flowing south underground from the former Davis landfill (Pages 4.8-9 and 4.8-10). The upper elevation of this toxic groundwater is 26.5 feet above sea level, which is the same elevation as the

95-9 Cont.

bottoms of the Village Farms proposed drainage channels and detention basin, which contradicts the EIR claim that toxic groundwater will be isolated from those drainage channels and the detention basin (Page 4.8-23). Since the EIR states that the current Village Farms site elevation is 35 -45 feet above sea level (Page 4.8-2), that would mean that the depth from the present surface to the proposed drainage channels and detention basin bottoms as well as the toxic groundwater would range from 8.5 feet to 18.5 feet. Elevation of their pads would consequently place structures somewhat farther above the poisonously toxic groundwater located beneath them so that excavation for home improvement projects by potential homeowners would have to go deeper to encounter it.

95-10

Of course, the planned excavation of the UATA down 9 to 10 feet would place its new surface much closer to the toxic groundwater so that animals using it for burrows and plants rooting there would be much more likely to encounter its poisons. And even though UATA stands for Urban Agricultural Transition Area, any products from farming or grazing for consumption by humans or their animals from such a potentially toxic environment might be very undesirable.

95-11

Significant populations of extremely rare Vernal Pool Tadpole Shrimp (which is federally-listed as endangered), Alkali Milk Vetch, and San Joaquin Spearscale at the Village Farms site's vernal pool and alkali prairie complex raises other issues. The EIR's Proposed Project would destroy all these taxa immediately and completely, which the EIR acknowledges (Page 4.4-107) while its Biological Resources Preservation Alternative (BRPA) would not. However, BRPA would isolate them in a small 47.1 acres area surrounded by intensive proposed urban development. That is miniscule compared to other areas of protected Critical Habitat for federally-listed as endangered Vernal Pool Tadpole Shrimp, which average 25,528 acres and are 440 acres at a minimum. To provide comparable protection the proposed Village Farms site's 497.6 acres are needed.

That is because urban areas produce a variety of stresses precluding the long-term survival of rare species. Such protection was tried for Sacramento Orcutt Grass (*Orcuttia viscida*), a California and federally-listed endangered species that is the only plant species found exclusively in Sacramento County. As is proposed in the Village Farms Biological Species Preservation Alternative (BRPA), a small preserve called Phoenix Field surrounded by residential urbanization was set aside

95-11 Cont.

for Sacramento Orcutt Grass, but a variety of environmental impacts from homes surrounding the preserve gradually extirpated it there, which could presage the fate of the rarest species at the Village Farms site if they were confined to a similarly small area surrounded by urbanization.

95-12

These comments provide numerous reasons why the Proposed Project and the BRPA as well should be rejected. Consequently, the best alternatives are No Build or Off-site Project. The latter alternative recognizes that if a project like Village Farms is needed for housing and to maintain school enrollment, it should be located where the numerous environmental issues are not present that make Village Farms at its present proposed location so disastrous.

95-13

While significant islands of biodiversity next to a city like the Village Farms site is adjacent to Davis are unusual, because of unusual Yolo County conditions a somewhat similar biodiversity island but with different rarest species is present at the City of Woodland's edge at its Woodland Regional Park and Preserve (WRPP), which that city manages with loving care as a surviving example of its precious heritage where its children can experience nature outside of just books and classrooms. The City of Davis now could do the same at the Village Farms site, a biodiversity hot spot with significant populations of some of the earth's rarest species. Protecting such a place at Davis, which is home to one of the world's greatest centers of evolutionary biology at UC Davis and has political leaders with a stated commitment to the 30X30 policy of protecting biodiversity is very much needed. There are few places that could bring 30X30 to life as well as the Village Farms site. Its open areas could be not just preserved for foraging by raptors and ground nesting by species like burrowing owls but also enhanced for these species by revegetation with suitable species like the milkweeds needed by monarch butterflies. Its trees, instead of being largely destroyed as the EIR proposes, could be increased for use by raptors, song birds, and bats and these additional trees could be native including large ones like valley oaks and smaller ones like elderberries hosting the rare valley elderberry long horned beetle. Especially significantly its vernal pool areas that support large populations of three of the earth's rarest species could be protected and even enhanced so that other rare species that once occurred there like the plants Heartscale, Brittlescale, Heckard's Pepper-grass, California Alkali Grass, and Saline Clover might return as well as possibly rare vernal pool animals like California Tiger Salamander (*Ambystoma*

Letter 95 Cont.

95-13 Cont.

californiense) and Western Spadefoot (*Spea hammondii*). A shallow permanent pond might even be constructed in the eastern part of the site that would support other special status species like Northwestern Pond Turtle (*Actinemys marmorata*) and Giant Garter Snake (*Thamnophys gigas*). Most significantly, there would be room for an environmental education center so kids in Davis, like those in Woodland, can see, touch, and learn about the natural beauty that still survives nearby. While this may sound like an impossible dream in a world where too much is valued solely for profit, as Dr. King reminded us, dreams can come true!

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LETTER 95: GLEN HOLSTEIN

Response to Comment 95-1
Please see Master Response 1.

Response to Comment 95-2
Please see Master Response 7. The commenter incorrectly claims that the Draft EIR says the project's impact to vernal pool tadpole shrimp habitat is less than significant. On the contrary, Impact 4.4-15 (page 4.4-94) clearly states that the Proposed Project would have a significant and unavoidable impact to vernal pool habitat.

Response to Comment 95-3
The land cover map provided on page 4.4-4 shows the HCP terrestrial land covers, as stated on the figure itself. There is no alkali playa or seasonal wetland land cover type included in the Yolo HCP because the species that inhabit such features are not covered by the Yolo HCP. A map of the aquatic resources currently present on the site (including the alkali playa and alkali wetland mapped during the aquatic resources delineation) is included on page 4.4-7. The description of the alkali prairie community on page 4.4-2 states that the "Alkali prairie land cover occurs around the large alkali playa..."

Regarding the reference to foothills, the following minor modification is made to the text on page 4.4-2 of the Draft EIR:

> The City of Davis is located within the Central Valley region of California, within southeastern Yolo County. The Central Valley is a north-south oriented valley that extends approximately 430 miles from southern Tehama County to south-central Kern County in southern California. Elevations in the Central Valley range from approximately zero to 400 feet above mean sea level (amsl). In general, the borders of the Central Valley are areas where alluvial soils grade into bedrock features. Biological communities in the Central Valley once supported vast areas of grassland, marshes, and riparian woodland. The landscape is currently dominated by ~~woodland biological communities, typically referred to as the foothills, with land uses that are predominantly~~ agricultural uses.

The foregoing revision is for clarification purposes only and does not affect the analysis nor conclusions of the Draft EIR.

Regarding the portion of the comment pertaining to golden rain tree and she-oak, the Draft EIR did not state that the riparian vegetation was completely inventoried. On the contrary, on page 4.4-56, it is stated, "Detailed tree data was collected throughout all areas outside the Channel A riparian corridor. Approximately half of the trees within the Channel A riparian corridor were also inventoried. Following discussions with City of Davis staff, the remaining trees within the riparian corridor were estimated by extrapolating the collected data to the remaining canopy area." Both the golden rain tree and the she-oak were documented during the special-status plant survey effort, and were located in the northwestern portion of the riparian corridor where the tree inventory was not completed. Therefore, these species are known to occur on-site, however they occurred within an area where tree numbers were extrapolated and are not specifically identified as individuals in Table 4.4-4.

Response to Comment 95-4

The comment summarizes the findings of the BRA prepared for the Proposed Project. Please see Master Response 7 related to biological resources.

Response to Comment 95-5

Consistent with the comment, heartscale, brittlescale, Heckard's pepper-grass, California alkali grass, and saline clover are acknowledged within the Draft EIR on pages 4.4-30, 4.4-31, 4.4-33, and 4.4-34. As explained therein, the species are considered absent from the project site/BRPA site consistent with the fact that none of the listed species were identified during the protocol-level surveys of the area conducted as part of the BRA.

While anecdotal evidence is not considered substantial, the Draft EIR includes Mitigation Measure 4.4-1(b), which requires development of a Special-Status Plant Mitigation Plan to be developed if any impacts to special-status plant species would occur. In addition, Mitigation Measure 4.4-1(a) requires new protocol-level special-status plant surveys to be conducted throughout the study area if project construction does not commence by the end of 2027, to ensure special-status plant species do not become established in the interim between the field surveys conducted for the project and project construction. Therefore, any impacts to the listed plant species would therefore be mitigated to a less-than-significant level.

Response to Comment 95-6

The comment summarizes the findings of the Draft EIR. Please see Master Response 7 related to biological resources.

Response to Comment 95-7

Please see Master Response 7.

Response to Comment 95-8

The vast majority of the permanent impacts associated with either alternative (81% for the Proposed Project, or 88% for the BRPA) currently consist of Grain and Hay Crops and Truck Crops, both of which are regularly tilled and replanted during the course of normal agricultural practices. Although the wildlife uses the commenter suggests are accurate, the loss of foraging habitat under either alternative would be mitigated through the payment of Yolo HCP Land Cover conversion fees, which are used to preserve foraging habitat elsewhere in the HCP Plan Area, where large blocks of land can be conserved together. It is possible that wildlife construct burrows in these fields each year, but each year those burrows are destroyed during the course of normal agricultural activities. Following project construction, these are the same uses that will occur within the UATA/Northern Agricultural Area. Following excavation of material in the Northern Agricultural Area, that area will again be available for the uses that are currently available, although at a lower grade than originally.

During the aquatic resource delineation, biologists noticed and specifically inspected the aerial patterns mentioned by the commenter. Three parameter data points were collected in three of these areas, and wetlands were not identified. No hydric soil indicators were observed, and vegetation was not dominated by hydrophytic vegetation. Regardless, as a component of Mitigation Measure 4.4-15(c), the USACE will review and verify the aquatic resources delineation map. If the USACE asserts that additional aquatic resources are present (anywhere in Project area), then those areas would be added to the delineation map, and mitigation for impacts would be required for any additional impacts.



Response to Comment 95-9
Please see Master Response 4.

Response to Comment 95-10
Please see Master Response 3. Groundwater monitoring performed by the City of Davis for the Old Davis Landfill indicates that groundwater from the landfill flows away from the agricultural buffer area.

Response to Comment 95-11
On the contrary, many local biologists (including Madrone biologists) annually visit Phoenix Field's Sacramento Orcutt grass population as a reference location for special-status plant surveys in the region. Although the population does fluctuate, the species continues to persist, and some years there are thousands of individuals present.

It is unclear why the commenter referenced acreages of preserved Critical Habitat for vernal pool tadpole shrimp, as the project site/BRPA site is not located within USFWS's Critical Habitat for the species (as shown on Figure 4.4-7 of the Draft EIR); however, it is acknowledged that larger preserves are generally ideal (for most biological resources) compared to smaller preserves.

With respect to the alkali playas within the project site/BRPA site, however, development has already encroached on three sides (Channel A levee to the north, Union Pacific Railroad tracks to the west, and the Cannery development to the south). To the east, the existing surrounding habitat is routinely tilled, planted, and harvested as part of normal farming practices, and connecting wetlands that contribute to the playa wetlands avoided as part of the BRPA do not exist. As a result, it is unclear how maintenance of the adjacent laser-leveled tomato field would contribute to the ability of the alkali playa wetland to support vernal pool tadpole shrimp and other vernal pool endemics. Furthermore, the 47.1-acre Natural Habitat Area would be adjacent to other open space areas that would provide habitat for a variety of wildlife species subsequent to project development. Specifically, the Natural Habitat Area would be adjacent to the proposed Channel A greenbelt to the north (which would be largely maintained as-is, with only trail improvements on one side of the channel), and to a strip of UATA to the south (between existing development and the BRPA site). The greenbelt would connect the habitat area to the broad drainage basin corridor, which would have a channel with adjacent riparian plantings meandering through patches of native grasslands and oak woodland. The drainage basin would connect up to the largely avoided Northern Agricultural Area to the north.

Overall, the contiguous areas would remain largely natural and provide wildlife habitat totaling approximately 181.7 acres, excluding the additional acreage of parks. The proposed parks would also provide some habitat and serve as a buffer to development.

Response to Comment 95-12
Please see Master Response 1.

Response to Comment 95-13
Please see Master Response 1.

Letter 96

Dara Dungworth

From: greg rowe <greglrowe51@gmail.com>
Sent: Saturday, February 8, 2025 10:10 PM
To: Dara Dungworth
Subject: Village Farms Timeline

CAUTION: **External email. Please verify sender before opening attachments or clicking on links.**

Dara,

I have been struck by how there is so little information in the DEIR about the project phasing. One has to search in various places and piece it together. For example, the only place I saw reference to the amount of time construction will take was on Page 4.3-47 under the heading of "Construction Emissions," where it says "The Proposed Project and the BRPA would both be built out over four phases across approximately seven years."

96-1

I also saw somewhere else (can't remember where) that construction is expected to take 7 years, which explains why I kept seeing references to the year 2033 in the Air Quality chapter.

I strongly suggest 2 things:

- The Wed night presentation should include a chart or table showing when construction will ostensibly start (2026), and when each phase will start and end.
- The Introduction or Executive Summary of the EIR also needs to include this information in a very obvious location and format (again, perhaps a table or chart).

-- Greg

LETTER 96: GREG ROWE (LETTER 1 OF 7, 02/08/25)

Response to Comment 96-1

CEQA does not require an EIR to identify timing of phasing. The Draft EIR appropriately evaluates the potential environmental impacts associated with full buildout of the project. Furthermore, as is typical for a project involving only program-level entitlements, specific phasing details are not available, nor are they required.

Letter 97

Comments on Chapters of Village Farms DEIR. Chapters 1(Intro) & 2 (Exec Sum). Questions in yellow. **Comments bold underlined.**

	Page	Effect #	Issue	Comment
97-1	1-3	Section 1 .3	Project Description: Project Entrance	It states that a second entrance to the development would be established from Pole Line Road in the north section of the project site, extending westward through the East Village. Questions: How would this intersection be configured? (1) Would it be signalized or a stop sign on Pole Line? Would a left turn pocket be established for northbound vehicles on Pole Line? (2) Would a right turn pocket be established for southbound Pole Line vehicles? (3) Would turns from the project into to Pole Line be "right only" turns?
97-2	1-9	Section 1.9	Biological Resources	**Comment**: A suggestion has been made to consult historical aerial photos and the wetlands discussion in the 2004 Covell Village EIR in evaluating potential wetland impacts associated with the proposed Village Farms project. I concur with this suggestion, and further suggest that prior wetland delineations of the site be consulted in determining potential wetland impacts resulting from the currently proposed project.
97-3	1-3 And 2-2	Section 1.3 And 2.2	Project Description: Pedestrian/ bike undercrossing	The DEIR states on p. 1-3: "If determined feasible, the Proposed Project would also include a pedestrian/bicycle crossing through an undercrossing near the Pole Line Road/Moore Boulevard intersection." A similar statement is on page 2-2, but is more explicit in identifying that the undercrossing would be near the Pole Line Road/Moore Boulevard intersection. **Comments:** it is critically important that an above or below grade undercrossing be established early in the project to enable the residents (especially children) in the 1,800 Village Farms dwelling units to safely access the Nugget Fields on the east side of Pole Line Road. The manner in which the undercrossing is described in Chapters 1 and 2 exhibits a disturbing lack of commitment to a critical element of the future infrastructure by the project applicant. If the ability to install the undercrossing now is missed if it were to be deemed "infeasible", it would be far too difficult, disruptive and costly to install the undercrossing in the future. The DEIR needs to be revised to address precisely when the feasibility analysis will be conducted, and to identify the specific project phase by which the undercrossing will be completed and fully operational. In addition, the DEIR must fully examine in detail what

97-3 Cont.

alternative locations may be available for such an undercrossing if it were not constructed at this location.

Moreover, the bicycle/pedestrian undercrossing of Pole Line Road absolutely MUST be included in the project's Baseline Features Agreement, and in the Baseline Features description that would be included on the Measure D ballot. A grade-separated crossing of Pole Line Road should NOT be included in the Development Agreement (DA) because a DA can be subsequently amended. Past history shows that it is simply too easy for project proponents/developers to go back to City Council, after the voters have approved a project, and obtain a DA amendment by simply asserting that one or more items in the DA would be too difficult to implement and/or are not financially feasible.

Questions: (1) When will the bike/ped undercrossing feasibility study be conducted? (2) Who conduct the study? (3) Will the study and its results and conclusions be peer-reviewed by another entity? (4) Who will pay for the study? (5) What factors will be used to determine feasibility, and how much weight will each factor have in the analysis? (5) Will "feasibility" be determined strictly by financial considerations, or will other factors such as geology, water table level, methods of relocating existing infrastructure (such as water line) also be taken into consideration?

97-4

COMMENT: It is also stated on page 2-2 that "The Proposed Project also provides an opportunity to explore a grade-separated crossing at F Street." This is a great idea, but the statement is nebulous as to whether, how and when such an "opportunity" will be explored. In other words, it is totally non-committal, when what is needed here is a firm commitment by the project applicant. The "who, what, where, when and how" needs to be explicitly described in the DEIR. Given that residents may wish to walk to the nearby Nugget shopping center, and more importantly that children residing in the proposed 1800 dwelling units will attend schools on the south side of Covell Boulevard, it is critically important that specific location(s) for a grade-separated crossing near the intersection of Covell and F Street be identified and evaluated in the EIR. For instance, (1) would the crossing be above ground or below grade? (2) Where would the overcrossing landings be located? (3) What would be the degree of slope for the overcrossing?

2

Letter 97 Cont.

97-5	1-10	Section 1.9	Hazardous Materials	**Comment**: The DEIR states a factor to be examined includes "Contamination impacts associated with locating the proposed groundwater recapture basins in proximity to the former landfill site." The examination must include how potential soil and groundwater contamination associated with the former landfill site could potentially impact the water quality in Channel A, and as a result, downstream habitat, wildlife, property and people.
97-6	2-7		Agricultural Preserver Alternative	The 2nd paragraph on this page states: "The significant and unavoidable impacts related to VMT would increase in severity under the Agricultural Resource Preservation Alternative due to reduced residential density." COMMENT: This sentence should be revised to clarify that the increased impacts would occur to **Per Capita** VMT; i.e., insert the words "Per Capita" before the VMT acronym. This is an important distinction. The sentence on the top of page 2-11 (which starts on page 2-10) likewise needs to be modified in the same fashion.
97-7	4.8-4	2-94		The DEIR states: "In conjunction with submittal of the first tentative subdivision map for the Proposed Project or BRPA, a design-level drainage report shall be submitted to the City of Davis Public Works – Utilities and Operations Department for review and approval. The drainage report shall identify specific storm drainage design features to control the 200-year, 10-day increased runoff from the project site to ensure that the rate of runoff leaving the developed site does not exceed the pre-project condition." **COMMENT:** Given the historical flooding problems in Davis, I respectfully submit that deferring submittal of a design-level drainage report until submittal of the first subdivision map is far too late in the development and approval process. The DEIR should designate that the drainage report must be completed and submitted to the City far earlier in the project development process.
97-8	4.13-2(c)	2-105	Circulation System including bike and ped facilities	The DEIR states that the following mitigation measure would be implemented: "The project applicant shall construct a roundabout with pedestrian and bicycle crossings on all legs at with pedestrian and bicycle crossings on all legs at the Pole Line Road/Moore Boulevard intersection."

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			COMMENT: This proposed mitigation measure is completely unacceptable. A roundabout, in and of itself, may be fine strictly for slowing the speed of vehicle traffic, but adding pedestrian and bicycle crossings to such a roundabout would introduce a high level of complexity to an already busy roadway, with a high probability of increased potential conflicts between vehicles and pedestrians and bicyclists. It must be kept in mind that many children residing at Village Farms will on a regular basis need to cross Pole Line Road to recreate at Nugget Fields. Such a roundabout, even with crossings for pedestrians and bike riders, would simply too dangerous. The proposed mitigation roundabout with designated crossings for pedestrians and bicyclists is also completely at odds with the previously referenced below-grade pedestrian and bicycle undercrossing at the intersection of Pole Line Road and Moore Boulevard (see pages 1-3 and 2-2). This proposed mitigation measure should be deleted and replaced with the following verbiage: "The project applicant shall construct a grade-separated bicycle and pedestrian crossing of Pole Line Road at or near the intersection of Pole Line Road and Moore Boulevard. The grade-separated crossing shall be completed and fully operational before completion of Phase II of the proposed project, and shall be fully funded by the project applicant."

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Comments on Chapter 3 – Project Description - Village Farms DEIR. Questions highlighted in yellow. **COMMENTS in bold underlining**
Submitted by Greg Rowe, City of Davis Planning Commissioner. Date: February 2, 2025.

97-9

Page	Effect #	Issue	Comment
3-2

97-10	3-5	3.4.4	Project Components	Comment: This paragraph should be amended to include, at the very least, the grade-separated crossing of Pole Line Road, plus a grade separated crossing of Covell Blvd.
97-11	3-6	Figure 3-4	Drainage Basin	The General Plan exhibit shows a large drainage basin between the East Village residential area and the North Village residential area to the west. **COMMENT:** The DEIR should address the potential for mosquitos to be attracted to the drainage basin and the measures that will be taken to lessen the potential spread of mosquito-spread illnesses. The DEIR should also explain the potential impact of hazardous substances infiltrating southward from the former City landfill into the drainage basin and the possible resulting contamination of stormwater contained in Channel A.
97-12	3-9	Table 3.1	Proposed Residential Uses	**COMMENT:** This table should be expanded to provide forecasts of how many people will reside in the various types of housing units. This would then provide an understanding of how many commuters the project will attract, and the number and ages of residents likely to access the Nugget Fields athletic center on a regular basis.
97-13	3-10		Residential Low Density	**COMMENT:** It is stated that the number of individual lots that could be purchased by any given individual could be restricted. This is an important issue, because it is my understanding that many individual and institutional investors bought properties at The Cannery, and then leased them (evidently in many cases to UCD students rather than families). If this project is to truly meet the anticipated needs for local housing, a mechanism definitely needs to be enacted that will prevent discrete investment entities from buying anything more than one or at most two homes.
97-14	3-12		Fire Station	**COMMENT:** I am having trouble understanding how having a fire station located at the busy intersection of Covell and Pole Line will enable fire personnel and vehicles respond quickly to emergencies. It does not seem to make intuitive sense. The DEIR should analyze how response times from this location would compare to the three existing fire stations in Davis.
97-15	3-15		Access & Circulation	COMMENT: The 3rd paragraph on this page states: "Additionally, if feasible, one pedestrian/bicycle crossing would be provided through an undercrossing near the Pole Line Road/Moore Boulevard intersection." As I have previously commented relative to where this statement appears elsewhere in the DEIR, this provision is completely unacceptable.

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3-43		BRPA circulation	The statement appears in the BRPA section on page 3-43, as follows: "If determined feasible and upon final designs, the proposed pedestrian/bicycle undercrossing at Pole Line Road would be constructed during Phases 2, 3, and/or 4." Questions: (1) What defines "...if feasible"? Is it based on cost, constructability, depth to ground water, existence of utility infrastructure that would need to be relocated, or what? (2) Who or what entity would determine the feasibility? (3) When would a determination of infeasibility be made? (4) If such a crossing were deemed infeasible by the project applicant, by what process would alternatives be determined and analyzed? (2) In what years will Phases 2, 3 and/or 4 occur, and how many dwelling units and number of residents are expected to be in existence at the beginning of each of those 3 phases? (The answer to this question will provide insights into how many residents may be exposed to high levels of negative vehicle/pedestrian interactions in the absence of a grade-separated crossing.) Figure 3.23 on page 3.44 should be amended to display this information. **COMMENT:** The environmental analysis should evaluate the various options that may be available for a ped/bike crossing of Pole Line Road.

97-16

3-17		Storm Drainage	The DEIR states: "The Covell Drain Channel then continues east through the central portion of the project site as Channel A, continuing to Pole Line Road where the drainage channel passes under the road in an existing box culvert and flows through the Wildhorse Golf Club course," after which it discharges to Willow Slough. **COMMENT:** This drainage system is already overtaxed, as graphically shown in a video taken by a Wildhorse resident at the Wildhorse Golf Club during a multi-day "Atmospheric River" rainstorm in January 2024. (The video was taken by the husband of Marjorie Longo. Ms. Longo showed the video to me several months ago). It showed this drainage channel overflowing its banks and flooding several fairways at the golf course during the storm. I attended one of the Village Farms community workshops on 14 January 2025, during which I discussed this video with an engineer who is a member of the project team. He had likewise seen the video. He explained that the persistent flooding problem at the golf course has resulted from the lack of an easement or similar agreement that would have enabled

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97-16 Cont.				City of Davis personnel to enter the golf course to engage in periodic drainage channel clearing, and the golf course owner has no interest in performing the work. The DEIR must explore this situation and explain how the current lack of periodic drainage channel clearance may or may not be exacerbated by the increased stormwater flow from the Village Farms project. (1) Would the golf course be completely inundated? (2) What measures need to be undertaken to account for this persistent lack of proper maintenance?
97-17		3-17		Storm Drainage	Question: What measures will be taken to prevent trespassing into the drainage channel during heavy rain events, particularly by children? Such facilities are naturally attractive to kids, who may want to swim or play in the moving water.
97-18		3-17		Stormwater Drainage	The DEIR states in the last paragraph on this page: "An additional channel would be constructed on the northern boundary of East Village *allowing runoff from larger storm events to flow over Pole Line Road in a northeast direction in a manner as currently occurs under existing conditions."* (Italics added for emphasis.) **COMMENT:** The proposal to allow excess stormwater volume to flow over Pole Line Road is absolutely lunacy! Stormwater may occasionally flow over the road under existing conditions, but this is not an acceptable practice that should not be allowed to continue after the amount of impervious surface has greatly increased at the project site. (Moreover, it should not be allowed to occur even now.) Pole Line Road is a busy road that already sustains heavy traffic volumes, especially during AM and PM peaks. Allowing water to flow over the road would cause vehicles to throw up huge "rooster tails" that would reduce driver visibility,. It would also potentially induce hydroplaning by vehicles, and make it more difficult for bike riders to ride on this road. Has anyone who wrote this section of the DEIR ever tried riding on a road with water flowing over it?!!? The proposal to allow excess stormwater to flow over Pole Line Road needs a completely new evaluation. It is highly deficient and probably one of the most ill-considered (stupid) means of dealing with stormwater that I have read during the more than 30 years that I've been involved in reading and reviewing draft EIRS. The BRPA equal weight alternative describes similar provisions for allowing excess stormwater to flow over Pole Line Road, stated as follows: "An additional channel would be constructed on the northern

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97-18 Cont.	3-41	BRPA	Stormwater Drainage	boundary of East Village allowing larger storm events to overtop Pole Line Road and flow to the northeast, matching the existing flow conditions in a rare 100-year, 10-day storm event." **COMMENT:** Given the evident effect of climate change on winter storms, a 100-year, 10-day storm event may not be such a rarity in the future. Designing a stormwater system to enable overflow onto a street that sustains high volumes of vehicle traffic is irresponsible. The DEIR should identify a different, safer and more comprehensive way to deal with this problem.
97-19	3-23		Bike-Ped Crossings	The DEIR once again makes vague, uncommitted reference to potential crossings of Pole Line Road and East Covell Boulevard: "The Pole Line Road undercrossing would land in the vicinity of the Nugget Fields parking lot. The Proposed Project also provides an opportunity to explore a grade-separated crossing at F Street. The study area of the EIR includes a potential landing area on the west side of F Street for a future connection." The text goes on to say: "Ultimately, the feasibility of the crossings will depend on landing constraints, potential impacts to the surrounding area, other unforeseen challenges, and, for the F Street crossing specifically, UPRR's requirements. The exact locations of the landing areas (within the Village Farms Davis site and the off-site locations) would be determined based on the final approach alignments developed in coordination with the UPRR and the City, subsequent to approval of the currently requested entitlements." **COMMENT:** Asserting a vague reference to a potential "landing" for a Pole Line Road undercrossing is insufficient to facilitate a robust CEQA analysis. The is either going to be such an undercrossing or there isn't. Make a definitive commitment that there in fact will be such an undercrossing, and then analyze the potential environmental impacts. Lacking such a full-fledged analysis, the environmental analysis is decidedly deficient. Reference to a potential landing area on the west side of F Street for an East Covell Boulevard crossing dictates that an analysis of such a facility would be warranted now as part of the CEQA analysis.
97-20	3-43		BRPA Phasing	**COMMENT:** The DEIR should identify the timing of the phasing, not in terms of a definite year, but at the very least identify the number of years after project initiation in which the respective phases would

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			commence. Figure 3-23 on page 3-44 should be amended to include this phasing information; i.e., in what years will phases 2, 3 and 4 commence and be completed and occupied?

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Template – Comments on Chapter 4.3 – Air Quality, GHG Emissions and Energy - Village Farms DEIR.
Yellow highlighting denotes questions. **COMMENTS** indicated by capitalized, bold underlining.
Submitted by Greg Rowe, City of Davis planning commissioner. 8 February 2025

	Page	Effect #	Issue	Comment
97-21	4.3-11		Odors	The last sentence under the Odors heading says: "The project site is not located near any of the aforementioned odor-generating uses." **COMMENT:** Although CEQA does not examine the potential effect of the environment on a project, it should be noted that during recent months, comments on the local version of "Nextdoor" have mentioned strong odors in east Davis, particularly in neighborhoods abutting the south side of Covell Blvd. It appears that the odors have been emanating from the Yolo County landfill on County Road 28H.
97-22	4.3-37		General Plan	**COMMENT:** The discussion of the Davis General Plan includes Transportation Element Goal #2, which addresses the local transportation system. Policy TRANS 4.4 states: "Provide pedestrian and bicycle amenities." Simply providing additional striping, crosswalks and visual cues to drivers in those segments of East Covell Blvd and Pole Line Road proximate to the proposed project does not meet the intent of this policy. Grade-separated crossings of Covell and Pole Line will be the only way to effectively comply with Policy TRANS 4.4.
97-23	4.3-45		GHG Emissions	**COMMENT:** Throughout the evolution of the proposed Village Farms project, it has been asserted numerous times by local elected officials and social media commenters that approval of the project would reduce GHG emissions by enabling more people employed in Davis to also live in the city, rather than commuting from other cities such as Woodland. On the other hand, Chapter 4.13 of the DEIR and the Transportation Impact Study (Appendix R) forecast that substantial increases in trip generation and aggregate VMT would result from the project. **Question:** Has an analysis been performed to compare the realistically potential reduction in GHG emissions that would occur as a result of more local workers being able to live at Village Farms, versus increased GHG emissions resulting from higher traffic volumes and congestion at the intersection of East Covell Boulevard and Pole Line Road, as well as other nearby intersections? By this question, I am not inferring that workers now living in Woodland's Spring Lake development, for example, would move to Davis. Rather, I am asking whether an analysis has been done that would evaluate probable GHG emissions if more **future** residents resided at

	Page	Effect #	Issue	Comment
97-23 Cont.				Village Farms rather than commuting from outside Davis, compared to greater GHG emissions resulting from heavier traffic and vehicle idling near the project.
	4.3-71 thru 73	Measure 4.3-7(b)		The DEIR proposes a number of mitigation measures to reduce construction related GHG emissions. Several of the measures warrant explanation of how they would actually function, because it may not be intuitively obvious to the lay reader. Examples:
97-24				• Modify the construction schedule to reduce the intensity of construction to lower emissions; **Question:** Modify the schedule in what manner: Starting earlier or later in the day, adjusting seasonality of construction, etc. Please explain. Also explain how this would be monitored.
97-25				• Ensure that phases of development do not overlap; **Question:** Explain how not overlapping development phases would reduce GHG emissions. It would seem that the same amount/volume of emissions would occur over time regardless of whether phases overlapped. Sorry, but I simply don't understand how this measure would be implemented and how it would effectively do anything meaningful to reduce GHG emissions.
97-26				• Encourage and provide carpools, shuttle vans, transit passes and/or secure bicycle parking for construction worker commutes **COMMENT:** This mitigation measure is basically a construction version of TDM. From my observation of large construction projects while working for the Sacramento Housing and Redevelopment Agency, the Sacramento County Department of Airports, and as Economic Development Manager for the Oakland Chamber of Commerce, construction workers on any particular project tend to come from widely a widely dispersed geographic area, and expecting them to organize into carpools and other types of shared rides would simply be impractical. In addition, given the shortage of qualified construction workers (especially since many could relocate to help rebuild Los Angeles), it would be imprudent to impose transportation requirements on them.
97-27	4.3-75	4.3-8	Operational GHG emissions	The DEIR says that operational GHG emissions would be reduced through a variety of mechanisms, including: "…the Proposed Project would include several bicycle and pedestrian infrastructure improvements…" **COMMENT:** As emphasized in comments on other chapters of the Village Farms DEIR, the efficacy of the proposed bicycle and pedestrian infrastructure improvements is highly questionable. Simply installing lane markings, crosswalks, visual ques for motor vehicle drivers and the like will be unlikely to give bike riders and

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	Page	Effect #	Issue	Comment
97-27 Cont.				walkers a sense of confidence near one of the most high-volume traffic intersections in the City of Davis (i.e., East Covell Boulevard and Pole Line Road). I am a highly experienced bike rider (now 73 and have been riding since age 5), and I will not ride near that intersection now, let along after it has 1800 dwelling units nearby. The only truly effective mechanism for helping to avoid collisions between motor vehicles and pedestrians/cyclists will be grade-separated crossings of Covell and Pole Line Road.
97-28	4.3-75	4.3-8	GHG and TDM	The DEIR references using TDM to reduce GHG emissions: "…the Proposed Project would implement TDM strategies to reduce VMT…" **COMMENT:** The DEIR once again cites TDM as a means to reduce GHG emissions, despite the fact that the uncertainties and difficulties inherent in implementing TDM strategies are well documented elsewhere in the DEIR. As noted on page 4.3-80, "…due to uncertainties related to the potential efficacy and feasibility of the GHG reductions measures, as well as the availability of off-site carbon credit programs, the full GHG reductions associated with the Proposed Project or the BRPA cannot be guaranteed at this time." Hopefully most readers of the DEIR will recognize that references to using TDM to reduce emissions is merely window dressing that has little practical meaning.
97-29	4.3-78	4-3-8	City of Davis CAAP	The DEIR describes alternative transportation methods that could be used to reduce GHG emissions: "The Proposed Project and the BRPA would include several improvements to the bicycle and pedestrian network within the City, such as construction of new bicycle lanes, bicycle and pedestrian crossings, and incorporation of signage and traffic-calming measures to improve mode-share safety on internal roadways used by bicyclists." **COMMENT:** As mentioned previously, signage, traffic calming (roundabouts, speed humps), new bike lanes and pedestrian crossings will be insufficient to provide a sense of safety and security sufficient to induce walking and biking among the residents of the project's anticipated 1800 dwelling units. A genuine approach would be a commitment now by the project applicant to construct grade-separated crossings on Pole Line Road, and preferably East Covell Boulevard as well.

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Comments on Chapter 4.7 – Hazards and Hazardous Materials - Village Farms DEIR.
Questions denoted in yellow highlighting. **COMMENTS Denoted in Bold Underlining**
Submitted by Greg Rowe, City of Davis planning commissioner. February 5, 2025

97-30

Page	Effect #	Issue	Comment
4.7-1	4.7.1 - Introduction	Phase II ESAs	The introduction states that the Environmental Site Assessments (ESAs) investigated "…effects to on-site soils from the former firing range site currently occupied by Davis Paintball and Blue Max Kart Club (hereafter referred to as Firing Range Phase II ESA). **COMMENT:** Notably absent from this sentence is any discussion about operations at the former 31-acre City of Davis landfill facility located north of the project site, which was closed in 1975. According to a State Water Resources Control Board Geotracker report issued 20 January 1993, known substances released by the landfill include freon, mercury, nitrate, other chlorinated hydrocarbons, inorganic salt, vinyl chloride, and various metals. According to the Geotracker report, the former landfill was unlined and lacked a leachate collection system, which would have prevented contaminants from migrating into groundwater and local aquifers. Consequently, the Geotracker report states that the former landfill is suspected of discharging metals, volatile organic compounds (VOCs), nitrates, and Total Dissolved Solids to groundwater. In a letter to the City of Davis Public Works Department, dated 26 July 2023, the Central Valley Regional Water Quality Control Board (RWQCB) stated that "…staff believes the landfill continues to degrade groundwater quality in the area and may also be a source of per-and-polyfluoroalkyl substances (PFAS)." The letter goes on to say that "…Staff has additional concerns about the lack of groundwater samples analyzed for PFAX chemicals because the property was previously used as a landfill and a wastewater treatment facility which are known to be sources of PFAS." I am concerned that these contaminants could still be present in soil and groundwater in concentrations that may negatively impact stormwater quality in the project's drainage basin, and as a result, likewise potentially effect downstream water quality and habitat. I could not find any information in DEIR Chapter 4.7 indicating whether the concerns expressed by the RWQCB relative to PFAS have been addressed. The DEIR should fully examine the potential continued existence of PFAS and PFAX in soil and groundwater in the Urban Agricultural Transition Area (UATA) and in the Urban Development Area.

	Page	Effect #	Issue	Comment
97-31	4.7-25	Phase II ESA	Soil Sampling	The following sentence appears on page 25: "…discrete surface soil samples were taken from the upper six inches of soil (beneath the vegetative layer, if present)." This sentence is relative to the Phase II ESA for the Urban Development Area, Urban Agricultural Transition Area and former City of Davis Policy Department Firing Range. Questions: (1) Is taking soil samples from at a depth of 6 only inches sufficient to reveal potential soil contamination? (2) Was groundwater sampling conducted? **COMMENT:** Given the past waste disposal activities in the project area, it would seem prudent to have obtained groundwater samples. During the time I was a redevelopment manager with the former Sacramento Housing and Redevelopment Agency (SHRA), I was responsible for commissioning Phase II ESAs in several redevelopment project areas, including Del Paso Heights and North Sacramento. Those efforts consisted of deploying drilling rigs to extract samples from depths up to 100 feet below ground surface. In one instance at a Del Paso Heights site, contaminated groundwater was discovered as much as 80 – 90 feet below the ground surface. While later serving 13 years as Senior Environmental Analyst for the Sacramento County Department of Airports, I commissioned contractors to assist with completing a number of soil and groundwater investigations and obtaining site closure decisions at four airports.[1] Based on this experience, and given the past activities at the unlined former Davis landfill, it is my opinion that it would be prudent to implement a robust protocol of groundwater sampling at the UATA and Urban Development Area.
97-32	4.7-26	Phase II ESA	Soil Sampling	Issue: Urban Agricultural Transition Area Phase II ESA. The following sentence explaining the sampling protocol is in this section: "The surface soil samples were taken from the upper six inches of soil (beneath the vegetative layer, if present)." In addition, on page 26, the DEIR goes on to state the following: "Subsurface soil samples were collected from the area adjacent to the Old Davis Landfill on March 11, 2024. Two soil borings were performed at the location of the proposed Channel A realignment south of the Old Davis Landfill, and two soil borings were performed at the eastern edge of the UATA boundary, west of the Old Davis Landfill (see Figure 4.7-6). At each boring location, Geocon obtained three soil samples from depths of zero to one foot, five to six feet, and nine to 10 feet bgs, respectively."

[1] Sacramento International, Mather, and Executive airports and Franklin Field.

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Page	Effect #	Issue	Comment
			Questions: (1) While it is good that sampling was conducted as far down as 10 feet bgs, is this depth sufficient to detect potential groundwater contamination? (2) Will the sampling described in this section of the DEIR be sufficient to ensure that contaminated groundwater will not seep into the realigned Channel A?

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Comments on Chapter 4.8 – Hydrology and Water Quality - Village Farms DEIR. Questions highlighted in Yellow. **COMMENTS** indicated in capital bold underlining.
Submitted by Greg Rowe, City of Davis Planning Commissioner, 5 February 2025

97-33

Page	Effect #	Issue	Comment
4.8-2 & 3 4.8-5		Off-site In Flow	The following quotes appear on pages 2 and 3: (1) In high flow conditions, storm water north of the project site from the North Davis Channel, overwhelms the capacity of the existing channel and spills south into the existing farm field (Flow #7). (2) "The North Davis Drain channelized flow (Flow #2) also overwhelms the channel capacity west of F Street, resulting in shallow flooding of the farm fields and ultimately overtopping F Street and the Railroad (Flow #8)." The following verbiage of concern also appears on the top of page 5: "Storm water flows from the aforementioned locations continue as shallow overland flow southerly across the farm fields and enters the project site, combining with the storm water from the Covell Drain and F Street channel. In high flow storm water events, storm water contained in the Cannery detention basin, located around the northern and eastern perimeter of the Cannery, overtops a concrete weir and flows overland eventually entering Channel A flows onsite." **Questions:** (1) How significant is the current overwhelming of the existing North Davis Channel (Flow 7)? (2) (2) How frequently does flooding occur? (3) The same questions pertain to overwhelming of the channel capacity west of F Street. (4) Same questions (frequency and severity) apply to the quoted excerpt on the top of page 5. Simply stating that the channels are occasionally overwhelmed, that weirs are overtopped and that overland flows occur, does not provide enough context. The frequency and severity need to be articulated in greater detail. **COMMENT:** The typical casual reader of the DEIR will no doubt be concerned as to why development is being proposed at the Village Farms site, when existing drainage channels in or near the proposed project site are already experiencing overtopping and related flooding conditions. The reader may question why development is being proposed in an area that is already compromised from the standpoint of historical stormwater flow and flooding patterns.

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	Page	Effect #	Issue	Comment
97-34	4.8-5		Flow Thru Project Site	The following text appears on page 5 regarding Flow Through the Project Site: "During high flow conditions, storm water overtops Channel A and spills to the north into the farm field. The overflow continues flowing overland to the northeast corner and begins ponding, eventually overtopping Pole Line Road." **COMMENT:** As with the comments above regarding Off-Site Inflow," the quoted verbiage provides the reader with no relatable context. **Questions:** (1) How often do such high flow conditions occur? (2) How severe is the ponding? (3) How often is Pole Line Road overtopped? (4) Is the overtopping of Pole Line Road ever severe enough to warrant closure of the road to vehicular traffic?
97-35	4.8-5		Project Site Outflow	The following excerpt appears under the heading of "Project Site Outflow" (text in italics indicate great concern to this commenter): Discharge into the Willow Slough Bypass is regulated by flap gates in the culverts penetrating the levees; during peak flows in the Willow Slough Bypass, the flap gates remain shut. *During this condition, flow from the Covell Drain watershed spills east out of the channelized flow and flows overland into the East Davis watershed resulting in ponding and flooding through the eastern reaches of the watershed."* **COMMENT:** As with the preceding comments, the quoted verbiage provides the reader with no relatable context. The analysis presented on pages 2-5 is entirely inadequate to provide the average reader with any real understanding of the current situation. More information must be added to make this chapter truly informative for decision makers and the public. Questions: (1) How often does such ponding and flooding occur in the eastern reaches of the East Davis watershed? (2) How deep is the flooding typically? (3) What is the worst flooding that has occurred in the East Davis watershed?

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Page	Effect #	Issue	Comment
4.8-9 and 10		Groundwater Quality	**COMMENTS:** My comments on Chapter 4.8 (Hazardous Materials) expressed concern about the potential impact of contaminated groundwater on stormwater that will accumulate in the proposed project's detention basin, largely due to legacy pollutants released to the environment during operation of the City's unlined former landfill ("Old Davis Landfill") north of the project site. Those concerns are substantiated by the text on page 4-9 of the Hydrology and Water Quality chapter, as follows: " As noted in Chapter 4.7, Hazards and Hazardous Materials, of this EIR, according to multiple records reviewed as part of the Urban Development Area Phase I ESA prepared for the project site, groundwater beneath the project site/BRPA site appears to have been impacted by the former landfill and is considered a potential Recognized Environmental Condition (REC)." The following is further noted on page 4.9-9 as a result of groundwater monitoring conducted during 2024: "Eight contaminants were found to exceed the Maximum Contaminant Level (MCLs) set forth by the United States Environmental Protection Agency (USEPA) and/or State of California. MCL is defined by the USEPA as the highest level of a contaminant that is allowed in drinking water and are enforceable standards," although the measured levels of these contaminants are seemingly similar to other sites in the Central Valley. What is most concerning, however, is the finding that detected per- and polyfluoroalkyl substances (PFAS) compounds and manganese appear to originate from the Old Davis Landfill, and that the measured levels of three PFAS compounds exceeded their respective USEPA water quality standards in monitoring wells. As stated on page 4.8-10 of the DEIR, the monitoring report concluded that *these high PFAS levels are not common in the region, so in all likelihood originated from the former City of Davis Landfill (italics added for emphasis).* It is further stated on page 4.8-10: "Manganese was detected at concentrations ranging from 29 to 340 micrograms per liter (µg/l) in groundwater beneath the project site/BRPA site, and some of the detected concentrations exceed the Secondary (aesthetic) MCL for manganese in drinking water (50 µg/l). Manganese was detected in groundwater at relatively high concentrations beneath the Old Davis Landfill, and such concentrations could be attributable to former landfill operations."

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Page	Effect #	Issue	Comment
4.8-22 4.8-23			In further corroboration of my concerns about legacy PFAS and manganese contamination associated with operation of the Old Davis Landfill, the following is stated on page 4.8-22 of the DEIR (italics added for emphasis): "In addition, as discussed above in the Existing Setting section, PFAS and manganese concentrations that originate from the Old Davis Landfill have been detected in groundwater beneath the project site/BRPA site. *On-site excavation to create the project's storm water system could expose contaminated groundwater."* Finally, page 4.8-23 of the DEIR describes recent studies indicating that PFAS and manganese could ostensibly be prevented from infiltrating into the stormwater detention and conveyance system by constructing the new drainage channel so that its bottom would be above the historical level of groundwater in the area, as follows: "Therefore, substantial evidence exists to conclude that potentially contaminated groundwater from the Old Davis Landfill would not come into contact with the Proposed Project/BRPA storm water system. As a result, substantial exists to support the conclusion that the project's runoff would not transport contaminated water into the downstream system." **Questions/Requests:** (1) Please describe the precautions that will be taken by the project applicant and the City of Davis to prevent groundwater contaminated by PFAS and manganese originating from the Old Davis Landfill from infiltrating into the stormwater that will be stored in the project's detention basin. (2) Describe methods that will be used to prevent exposure of PFAS and manganese contaminated groundwater during construction of the project's stormwater system during construction of the project's detention basin. (3) Please describe the measures that will be undertaken by the project applicant and the City of Davis to prevent PFAS-contaminated water from impacting downstream drainage channels, habitat and water users. (4) Given that the continued high levels of persistent PFAS compounds originating from the Old Davis Landfill exceed federal and State regulatory standards, to what degree can the City of Davis be found liable for any impacts to water quality associated with approval and construction of the proposed project? (5) Please describe what constitutes "substantial evidence" that the recommended stormwater channel depth would prevent contact between PFAS and manganese contaminated groundwater. (6) What would be the potential ramifications if the historic level of groundwater were to rise over time, potentially causing contaminated groundwater to come into contact with stormwater? What precautions will be taken now to prevent such contamination if the groundwater level were to rise?

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	Page	Effect #	Issue	Comment
97-39	4.8-34	4.8-4	East Davis Ponding	The DEIR states that the proposed project's contemplated stormwater drainage system will decrease the likelihood of East Davis ponding and flooding, as follows: "As shown in Table 4.8-3, the Proposed Project is anticipated to result in approximately 0.01-foot of increase to water surface elevations in the 100- and 200-year, 10-day storm event. The increase is based on an analysis that is anticipated to be conservative for the combined hydrologic and hydraulic impacts of the Proposed Project. The Proposed Project would result in reductions in ponding depths in smaller, more frequent storm events within the watershed as shown with the net reductions in ponding depths for the 10- and 100-year, 24-hour storm events." I have seen a video taken by a Wildhorse resident in early 2024, showing fast moving stormwater in the Covell Drain inundating several fairways at the Wildhorse golf club. The speed of the flowing water and the noise it made were impressive, indicating that a high volume of water was moving at a fast pace. I mentioned this video to a representative of the project applicant during one of the community briefings conducted by the applicant in January. He responded that he had likewise seen the video, but was of the opinion that this flooding was the result of a long-standing inability of the City of Davis to obtain an easement or other form of right-of-entry to regularly clear the portion of the drainage channel within the golf course, and that the golf course owner does not want to engage in such maintenance. The example shown in the video is apparently not an isolated situation, and may continue into the future, as indicated by the following statement on page 4.8-38: "The 100-year, 24-hour storm event does show some isolated areas with larger increases that would occur within drainage features along Covell Drain in the Wildhorse golf course." Questions: (1) Given this situation, what confidence is there that the project applicant's proposed stormwater facility improvements will in fact ameliorate and/or prevent downstream flooding and ponding in East Davis? (2) I have witnessed flooding at and near Sutter Davis Hospital in the past, and in my observation that has potentially resulted from inadequate clearance of vegetation and debris from the Covell Drain by the City of Davis. To what extent can the Davis populace have confidence that the City and/or applicant will carry out proper maintenance of the contemplated new channels so as to prevent ponding and flooding in neighborhoods east of Pole Line Road?
97-40				

Letter 97 Cont.

	Page	Effect #	Issue	Comment
97-41				**COMMENT:** It is evident that storms are becoming more intense due to climate change, so one has wonder about the veracity of the assertions in the DEIR that the proposed stormwater improvements and mitigations will prevent future flooding and overwhelming of the entire drainage system. Question: Did the analysis that produced the conclusion referenced on page 4.8-34 take into account the potential increase in the intensity of northern California storms associated with climate change?
97-42	4.8-40	4.8-4	Drainage Report	**COMMENT:** Design Level Drainage Report: I have concerns about waiting until the tentative subdivision map is submitted to develop this report. Given the reported inability to properly maintain the segment of the Covell Drain within the Wildhorse Golf Course, what assurance is there that fiscal and institutional constraints could prevent the City of Davis in the future from adequately maintaining all of the drainage channels serving the proposed project? As a 25-year resident of West Davis, I have witnessed numerous occasions when the drainage channel between the north side of West Covell Boulevard and Sutter Davis Hospital has overflowed during and after heavy rainstorms, as a result of inadequate vegetation and debris maintenance in the channel. This experience does not instill great faith that drainage facilities in East Davis will be adequately maintained in the future to prevent flooding and ponding.

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Comments on Village Farms DEIR – Chapter 4.9 – Land Use and Planning
Questions appear in yellow shading. **COMMENTS** are in capitalized bold font with underlining
Submitted on 6 February 2025 by Greg Rowe, City of Davis planning commissioner.

Page	Effect #	Issue	Comment
4.9-20		LAFCO Consistency Decision	Issue: Optimum Way to Create Easements. This section of the DEIR discusses policy considerations relative to annexation of the project site by the City of Davis. #5 on page 4.9-20 addresses required agricultural mitigation as follows: "While the Proposed Project and BRPA would both result in the conversion of agricultural land to urban uses, the discussion in Chapter 4.2, Agricultural Resources, of this EIR confirms the preservation of equivalent acreage of farmland elsewhere at a 2:1 ratio through Mitigation Measures 4.2-1(a) for the Proposed Project and 4.2-1(b) for the BRPA. In addition, the proposed 118.4 acres of UATA would incorporate the minimum 150-foot agricultural buffer required by the City. The permanent agricultural easements to the north would also provide a permanent barrier to further expansion." **COMMENT:** It is vitally important that the required agricultural easements be conveyed to a qualified non-for profit organization such as the Yolo Habitat Conservancy, which implements the HCP/NCCP for Yolo County, or alternatively the Yolo Land Trust. The ag easement should not under any circumstances be conveyed to the City of Davis, the County of Yolo, or any other governmental entity that could be subject to future political pressures to amend the easements for the purpose of enabling development of the property. Establishing the required ag easements in favor of the City or County could potentially precipitate a future situation similar to the recent controversy regarding the proposed North Covell Creek project. When the Wildhorse Ranch project was approved, a conservation easement was placed on the golf course, with the easement conveyed to the City of Davis. Last year the golf course owner proposed that a portion of the land comprising the golf course conservation easement (CE) be split off for the purpose of building homes, contending that the City has the legal ability to amend the CE in this manner. If the easement had originally been conveyed to an entity such as the Yolo Habitat Conservancy (which did not exist at that time) or the Yolo Land Irust, the recent controversy would have been precluded from happening. The appropriate CE steps must be taken now with respect to the agricultural mitigation easements that will be required of the project applicant.

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	Page	Effect #	Issue	Comment
97-44	4.9-26 4.9-27	Policy 2.5 - Trans	Class 1 Bike Lanes	Shared Use Class I shared-use Paths (italics added for emphasis): "The DEIR says. Construction of new Class I shared-use path connections at the existing Cannery Avenue/Cannery Loop, East Covell Boulevard/L Street, Pole Cannery Avenue/Cannery Loop, East Covell Boulevard/L Street, Pole Line Road/Picasso Avenue, Pole Line Road/Donner Avenue, and *Pole Line Road/Moore Boulevard intersections…"* **COMMENT:** Consistent with my comments on other chapters of the DEIR, I am greatly concerned that the project description and the DEIR lack an unambiguous commitment to providing a grade-separated bicycle and pedestrian crossing at the intersection of Pole Line Road and Moore Boulevard. The verbiage used in the discussion of Policy TRANS 2.5 must be revised to make it clear that a grade-separated crossing will be installed at this intersection. It should also be made clear that this grade-separated crossing shall be required irrespective of the roundabout at this intersection that is referenced on page 4.9-27.
97-45	4.9-28	Policy Trans 4.2	Trails and Bike Network	The DEIR contains the following verbiage regarding separations between bikes, pedestrians and motor vehicles: "…minimize conflicts between pedestrians, bicyclists, equestrians, and automobiles; and minimize impacts on wildlife. Greenbelts and separated bike paths on arterials should serve as the backbone of much of this network." **COMMENT:** The reference to "separated bike paths" lends policy support for requiring the applicant to construct a grade separated bike and pedestrian crossing of Pole Line Boulevard at Moore Boulevard.

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Comments – Village Farms DEIR Chapter 4.11 – Population and Housing.
Submitted by Greg Rowe, Planning Commissioner

97-46

Page	Effect #	Issue	Comment
4.11-2 4.11-7		People/ Unit	The DEIR states that at build out the project would have 1,800 units. Based on the current Davis average of 2.57 residents per unit, the population of the project is expected to be 4,626. According to a Student Population Forecast report presented to the DJUSD Board of Education on 2 March 2023 and to the Davis City Council on 7 March 2023, 7,177 students lived in Davis and attended Davis schools during 2023. (This does not include 1,210 more students who lived outside Davis but who attended Davis schools.). According to the City of Davis website, there are 25,869 housing units in Davis. Using the student enrollment data cited above, it appears that on average there are 0.277 students per Davis household. If these data were to continue to hold true, at full buildout there would be 498.6 students living at Village Farms (1800 units x 0.277). The school district report points out that declining births are likely to result in a continued enrollment decline in Davis schools. If one were to therefore take a conservative approach and assume that the number of school age children likely to reside at Village Farms at buildout would range between 400 and 450 students, that is still a significant number of students who on a daily basis would need to cross Covell Blvd. to attend school. This is also a significant number of children who may be likely to utilize the Nugget Fields sports complex on a periodic basis (along with their parents), and would be in need of a safe way to get across busy Pole Line Road.
		Need for safe under-crossing	**COMMENT:** Given that potentially 400 – 450 (or even more) students will reside in the 1800 housing units that would be built at Village Farms, it is unconscionable for the project applicant to propose nothing more than a vehicle roundabout at the intersection of Pole Line Road and Moore Boulevard. The project must be revised to include a grade-separated crossing of Pole Line no later than the completion of Phase 2 of the project.

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Comments on Chapter 4.13 – Transportation - Village Farms DEIR. Questions highlighted in yellow. **COMMENTS** in bold underlining. Submitted by Greg Rowe, Davis planning commissioner. Submitted 4 February 2025.

	Page	Effect #	Issue	Comment
97-47	Pages 4.13-11 and 12	Trans	Emerging Trends	The DEIR states as follows: "... combined bus and rail ridership on SacRT declined by approximately 19 percent between 2016 and 2019 (prior to the COVID-19 pandemic) and by approximately 54 percent between 2016 and 2022 (after the COVID-19 pandemic)." **COMMENT:** State legislation (SB 375 and SB343) has aimed to reduce vehicle driving through infill development (such as the proposed project). Further, Objective 4 of the proposed project aims to "Facilitate development that promotes non-vehicular travel and supports active modes of transportation." However, the documented reduction in public transit ridership within the region, combined with the fact that only 5% of Unitrans riders are non-UCD students, makes it seriously questionable whether the proposed project would to significantly increase the likelihood that fewer people will drive their own vehicles for commuting and other trips. In addition, the DEIR emphasizes repeatedly that it is currently uncertain how the public will adapt to and embrace new travel technologies, thereby making it more difficult for traditional transportation models to accurately predict future travel modes.
97-48	Pages 12 - 13	VMT	Peripheral project VMT-Higher VMT in Outlying Davis Areas	The DEIR notes that per capita VMT is higher in Davis (30.1) than the SACOG region overall (21.7), and that per capita VMT in Davis is highest in the outlying, peripheral areas than in Central Davis. The exact verbiage: "Residential VMT per capita generated by existing residential uses within the project site vicinity (e.g., the Cannery, North Davis, etc.) is approximately 31 VMT per capita, three percent above the existing City average and 43 percent above the existing SACOG average. For reference, existing residential VMT per capita in more centrally located Davis neighborhoods such as Central Davis and Old East Davis measures in the range of 25 to 27 VMT per capita, while existing residential VMT per capita in more outlying areas such as Mace Ranch or South Davis measures in the range of 33 to 36 VMT per capita." **COMMENT:** Given that residential per capita VMT is highest in outlying neighborhoods such as the nearby Mace Ranch, **it is highly predictable that residential per capita VMT for Village Farms will likewise be well above the current City average and SACOG average.** In fact, the DEIR reveals on in

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				section 4.13-4 (page 4.13-40) that the project is expected to have residential VMT per capita of 31.5, and the BRPA would be even higher at 32.8. This will make it extremely difficult—if not impossible--to attain the project's objective #4, to "facilitate development that promotes non-vehicular travel and supports active modes of transportation."
	Page 4.13-24		Trip Generation	The DEIR says the model produced the following trip generation estimates: "...the Proposed Project would generate an estimated 13,885 net new daily trips, 1,089 net new AM peak hour trips, and 1,471 net new PM peak hour trips during a typical weekday." The BRPA "...would generate an estimated 15,415 net new daily trips, 1,199 net new AM peak hour trips, and 1,631 net new PM peak hour trips during a typical weekday." Questions: (1) How does the number of expected new daily trips compare to the number of new trips that were predicted for the Wildhorse project, and other similar projects that have been proposed in the area such as Palomino Place? (2) In which directions would these new trips proceed after leaving the project site? (3) The number of daily trips is 1,530 higher in the BRPA. This reason(s) for this difference may be explained elsewhere in the DEIR, but please explain it in this paragraph. **COMMENT:** Although I realize that VMT is the criteria being used to determine impact in this DEIR, it would nonetheless be extremely helpful if the predicted number of new daily trips were placed into an easily understood context that would resonate with non-technical readers. In other words, even though LOS is not relevant to CEQA, how would these additional trips compare to the number of vehicles that currently pass through the intersection of East Covell Blvd and Pole Line Road on a daily basis, or the intersection of East Covell Blvd and L Street? More information is needed to help readers gain an understanding of the proportionality and context of 1,885 to 15,415 additional trips in a manner to which the reader can relate in everyday terms.
	Page 4.13-24	VMT	Centroid Connectors	**COMMENT:** Please define "centroid connectors," and explain their importance or usefulness in transportation analyses. Also define "synthetic population inputs." All too often, CEQA documents seem to assume that the lay reader understands such terms and acronyms. Please define such terms using parentheses or footnotes.

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	Page 4.13-32	Impact 4.13-2	Conflict with policies, and programs.	The DEIR once again equivocates as to whether grade-separated pedestrian and bicycle crossings of Pole Line Road and Covell Boulevard will ever be constructed. The verbiage: "If feasible, construction of one pedestrian/bicycle crossing through an undercrossing near the Pole Line Road/Moore Boulevard intersection and one future grade-separated crossing at F Street. These crossings would be constructed in Phases 2, 3, or 4 of project implementation. Due to uncertainties regarding the timing and feasibility of the foregoing crossings, the TIS did not consider either as project components for the purpose of the analysis;" **COMMENT: The decision to not include these two grade-separated crossings in the transportation analysis is a serious error in judgment that in my view should disqualify the DEIR from certification.** Without analyzing the operations of such grade-separated crossings, the public would be deprived of knowing how much pedestrian and bicycle transportation would occur if such facilities were implemented. In other words, the characteristics of bike and pedestrian travel with and without such facilities needs to be compared and thoroughly evaluated. The DEIR must evaluate these facilities, with the assumption that they would be fully operational before the conclusion of Phase 2 of the project.
	Pages 4.13-33-34	Impact 4.13-2	Conflict with existing policies, etc.	**COMMENT:** The DEIR itself clearly points out the problems likely to result from the absence of grade-separated bike and pedestrian crossings of East Covell Boulevard and Pole Line Road, as follows (*italics* added for emphasis): "While most pedestrian and bicycle desire lines would be adequately accommodated by the existing and proposed active transportation network within and surrounding the project site/BRPA site, active transportation network gaps would impede pedestrian and bicycle access to and from the site at several locations. *Additionally, at several locations, inadequate bicycle and pedestrian facilities and/or crossing amenities, coupled with project-related increases to vehicle traffic, would exacerbate bicyclist and pedestrian exposure to conflicting vehicular traffic in a manner that could increase the potential for collisions".* The DEIR concludes this would be a significant impact. Later in Chapter 4.13, on page 51, the DEIR admits the inherent potential difficulties for bike and pedestrian travel that would accompany the proposed project (*italics* added for emphasis): "*Additional physical mixing between bicyclists, pedestrians, and vehicles at the specific locations described in Impact 4.13-2 [pages 4.13, 31-36] would increase the potential for conflicts involving people walking and biking that are attributable to the Proposed Project/BRPA.)*

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		Measure 4.13-2-c	Vehicular conflicts with bikes and pedestrians	Because the DEIR explicitly admits that the project would exacerbate bicycle and pedestrian exposure to conflicts and collisions with vehicular traffic, the environmental analysis will be deficient in the absence of exploring and defining the degree to which grade-separated ped and bike crossings would ameliorate this problem. Roundabouts and signalized intersections alone will not properly protect bicycle riders and pedestrians. The mitigation measures described on pages 33 – 36 of this chapter will not be sufficient to provide legitimate protection to pedestrians and bicyclists. In particular, the measures described in section 4.13-2(c) are totally inadequate to protect bike riders. They simply won't induce sufficient confidence in the safety of the referenced roadway segments to encourage biking. The identified measures are: " The project applicant shall construct a roundabout with pedestrian and bicycle crossings on all legs at the Pole Line Road/Moore Boulevard intersection. Bicycle and pedestrian crossings shall be placed through the splitter islands for each roundabout approach to minimize the number of multi-lane crossings, and shall be designed to the satisfaction of the City Engineer. In addition, the project applicant shall install traffic signals and pedestrian crossings on all legs at the Pole Line Road/Donner Avenue and Pole Line Road/Picasso Avenue intersections." The text of the DEIR goes on to say the following on the bottom of page 34: "Implementation of the foregoing improvements, or a set of improvements of equal effectiveness as determined by the City Engineer, would reduce the potential for conflicts involving bicyclists or pedestrians that would otherwise be caused by the project and *promote bicycle and pedestrian travel to and from the project site/BRPA site."* As an experienced cyclist (now 73 years of age with 68 years of riding), I dispute that the proposed improvements would adequately reduce the potential for conflicts between vehicle traffic and bicyclists and pedestrians. Question: The above text does not describe the degree or percentage to which conflict potential would be reduced. What is it? Please define, and provide empirical proof based on real-world studies or experience to justify this assertion. .

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97-54	4.13, page 35	4.13-2(d)	Bike and Ped Safety – Birch Lane	In terms of the intersection of East Covell Blvd and Birch Lane, the DEIR says that the following improvements will be implemented to improve bicyclist and pedestrian safety and reduce conflicts with vehicular traffic: "The improvements shall include: installation of high visibility bike lane conflict markings in the northbound and southbound direction across both East Covell Boulevard and Denison Drive; high visibility marked crosswalks across the east leg of the East Covell Boulevard/Birch Lane intersection and across the east and south legs of the Birch Lane/Denison Drive intersection; and installation of a bike lane with conflict markings at the northbound approach of the East Covell Boulevard/Birch Lane intersection. **COMMENT:** The DEIR needs to provide empirical proof (performance data and other information) that such so-called improvements would in fact reduce conflicts between vehicular traffic and pedestrians and people riding bikes. Please cite relevant empirical studies or documents to substantiate these assertions.
97-55	4.13, page 35	4.132(f)	Bike-Ped Safety at Oak Tree Plaza	Issue: In terms of the 3 entrances/exits for Oak Tree Plaza on East Covell Blvd, the DEIR states that potential bicyclist and pedestrian conflicts with vehicular traffic would be decreased through the following: "Prior to occupancy of the first residential unit during Phase 1 of the Proposed Project/BRPA, the project applicant shall install high visibility bicycle and pedestrian crossing markings and accompanying signage at the three Oak Tree Plaza driveway intersections with the East Covell Boulevard shared-use path, consistent with the ECCP, to the satisfaction of the City Engineer." **COMMENT**: As a frequent shopper at Oak Tree Plaza[1], I can attest that it is currently very difficult for drivers to see bike riders on the multi-use path, and to accurately gauge whether there is sufficient time to execute a turn into or out of the parking lot in order to avoid colliding with a bike rider. Visibility is hampered by the trees in the grass strip between the multi-use path and the parking lot. No amount of high visibility striping and markings will resolve the current problem, let alone address the safety problems that will result from higher traffic volumes after implementation of the proposed project.

[1] I typically drive for shopping a Nugget, but often ride my bike from west Davis to the Oak Tree Plaza CVS store, crossing town on 8th Street to J Street, and entering the shopping center from the south side.

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Comments – Chapter 4.14 – Utilities and Service Systems - Village Farms DEIR.
Questions in yellow shading. **COMMENTS** in Bold Underlining
Submitted by Greg Rowe, City of Davis planning commissioner. Submitted 6 February 2025

	Page	Effect #	Issue	Comment
97-56	4.14-4		Changes in depth to Groundwater	The DEIR discusses seasonal fluctuations in depth to groundwater as follows: "Seasonal variations show the shallowest depth to water levels occurs in the spring (March/April) with greatest depths in summer (July/August), when groundwater levels are at their lowest. The City tracks groundwater levels in the intermediate and deep wells, which generally decline during dry conditions due to continued reliance on groundwater for agricultural and municipal demands. However, groundwater levels substantially recover during wet years." The DEIR also mentions that the City of Davis began receiving surface water in 2016 from the Woodland-Davis Clean Water Agency (WDCWA), of which the City is a member. It has been documented that since 2016, the City is able to rely on the WDCWA to meet most of its needs annually from autumn through spring, but must augment water supplies during the summer with groundwater supplied from City wells. **COMMENT:** This discussion does not sufficiently discuss how the average depth to groundwater has changed in Davis since the City began receiving water from the WDCWA. It would seem logical to assume that the water table has been increasing (rising closer to the surface) because less water has been pumped from City wells to meet municipal demand. If that is indeed the case, then it would seem to increase the likelihood that leachates from the Old Davis Landfill could infiltrate into the stormwater detention system and drainage channels contemplated for the proposed Village Farms project because the water table would be closer to the bottom of the detention basin and channels. Please see my related comments on Chapters 4.7 (hazardous materials) and 4.8 (hydrology) regarding potential impacts from the Old Davis Landfill relative to hazardous substances and stormwater quality. The DEIR therefore needs to be amended to: (1) address whether the average depth to groundwater has indeed been decreasing since 2016, and
97-57	4-20		Water Conveyance	

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Page	Effect #	Issue	Comment
			(2) evaluate the extent to which a decreasing depth to groundwater has been or will increase the likelihood that PFAS and manganese (along with other hazardous substances) will mix with stormwater and therefore cause downstream negative impacts to habitat, wildlife and other water users. This page discusses the water conveyance infrastructure, particularly sections of the existing water lines that would need to be replaced with larger diameter pipe beneath East Covell Boulevard, Fifth Street, Sycamore Lane and near the intersection of Anderson Road and Alvarado Avenue. Question: Which entity would pay for installing the larger diameter water supply lines; the project applicant, the City of Davis, or a combination of the two? The DEIR should be amended to provide this information.

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Comments on Chapter 7 – Alternatives Analysis - Village Farms DEIR.
Bold yellow font indicates **QUESTIONS.** Bold underlined font indicates COMMENTS.
Submitted by Greg Rowe, City of Davis planning commissioner. 9 February 2025

	Page	Effect #	Issue	Comment
97-58	7.19		Land Use Plan	**COMMENT:** Exhibit 7.2 has an error. The legend for Ag preservation and roads is reversed. It incorrectly shows the red crosshatching as being major roads, but it should be Agricultural. The legend shows a brown dotted line, but mistakenly labeled it Agricultural.
97-59	7.26 7-32		Higher # of Units Alternative Negative impact on population growth and active transportation	**COMMENT:** This alternative exceeds the bounds of credulity. I have been involved in evaluating EIRs since the mid-1980s, and don't recall ever reading a DEIR that included an alternative that had an intensity increase of this magnitude above the proposed project. It would escalate the number of units by 50%, which is an enormous difference compared to the proposed project and the Biological Preservation Resource Alternative (BRPA). I also question the validity of choosing this alternative, given that the DEIR make the point on pages 1-2 of this chapter that alternatives are supposed to encompass fewer impacts, as follows (underlining added for emphasis): Because an EIR must identify ways to mitigate or avoid the significant effects that a project may have on the environment (Public Resources Code [PRC] Section 21002.1), the discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly (CEQA Guidelines Section 15126.6[b]). If for some reason it was deemed necessary to examine a higher density alternative, I assert it would have been more productive to choose a high density alternative in which the increased number of units was far less than 50% more than the proposed project. Doing so would have produced a more believable analysis. Using the city's average of 2.57 residents per household, this alternative would add 6,939 residents to Davis (compared to 4,626 for the Project and BRPA), which would be equivalent to an approximate 10% uptick in the total Davis population within just 7 years. Given that this alternative would increase the number of residents at build out by more than 2,300 (see page 7-30), it is easily foreseeable that vehicle congestion would make the bicycle mode of transportation

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Page	Effect #	Issue	Comment
7.31		Magnitude of DU increase VMT analysis	unacceptably dangerous and impractical. The potentially deleterious effect on biking and pedestrian use of the nearby area is verified by the following statement on page 7-32: "Therefore, the severity of impacts related to conflicts between vehicles and pedestrians/bicyclists could be increased as compared to what is anticipated to occur under the Proposed Project." This leads to the logical question of why any reasonable person would be willing to trade the possibility of lower emissions for a greater number of conflicts between vehicles and people using active modes of transportation (including serious injuries and deaths). Choosing an alternative in the range of 10 – 20% higher, rather than 50%, would have provided the typical DEIR reader and Davis resident with a better understanding of how a relatively modest and more realistic increase in density would look like. It seems like this alternative was selected without any detailed thought about what could have constituted a reasonably scaled increase. A 10 or 20 percent increase above 1,800 units would have been preferable, which would have yielded a total of 1,980 and 2,160 units respectively. Using the City's average number of 2.57 residents per household, the result would have been either 5,089 or 5,551 new residents added to the City during the projected 7-year construction period, compared to 4,626 new residents for the Proposed Project and the equal weight BRPA. It appears that the only justification for assuming a 50% increase in the total number of units alternative entails was to achieve a "better" VMT per capital result from the standpoint of the CAPCOA handbook, as conceded by the following statement on page 7-31: "The 2,700-unit count was selected for the Alternative in order to reduce per capita VMT below both City and regional average VMT thresholds of 30.1 and 21.7 VMT per capita, respectively. The residential VMT per capita associated with the Proposed Project was calculated to be 31.5." The rationale for selecting this alternative is in fact admitted in the DEIR on page 7-33, as follows: "This Alternative's analysis places primary importance on the elimination of the Proposed Project's significant and unavoidable (project-level and cumulative) VMT impacts." **In other words, predetermined bias was the primary rationale for examining this alternative. It was chosen to obtain a preferred result, perhaps in the hope that it will be the alternative City Council decides to place on the ballot.**
7.28		Analhysis Bias	

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Page	Effect #	Issue	Comment
			Although such an enhanced VMT per capita result would seemingly improve GHG emission considerations, it would cause negative impacts readily observable to Davis residents, including LOS and commuter travel times. Given that the use of per capita VMT as a measurement tool is essentially an artificial construct resulting from AB743, I can find no justification for introducing this many more units and residents at one of the busiest intersections in Davis. A more nuanced assumption for greater density would have likely produced results more acceptable to a greater number of current Davis residents. The DEIR offers an explanation of why the VMT metric would supposedly improve with substantially higher residential density, as follows: "...most CAPCOA VMT reduction strategies also reduce GHG emissions and criteria pollutants, considered co-benefits, by reducing the source metric of VMT (i.e., vehicle ownership, number of vehicle trips, and trip distance)." This statement overlooks the fact that a sizeable number of people live in Davis because of the perceived quality of life, and commute out of town daily to jobs elsewhere in the Sacramento region and even the Bay Area. This factor alone may well render inaccurate the assumption of fewer owned vehicles, fewer vehicle trips and shorter trip distance. QUESTION: The DEIR states on page 7-28 that: "Overall, the Higher Number of Units – Same Footprint Alternative would result in fewer impacts related to Air Quality, GHG Emissions, and Energy as compared to the Proposed Project." Therefore, what is the rationale for selecting an alternative that increases the density of the project by half but would only reduce three impacts?
7-31 and 7-32		Residential Self Selection	**COMMENT:** The DEIR attempts to justify the focus on VMT per capita by using the following scenario, which I find uncompelling: "A hypothetical example of this in the context of the currently proposed project is an existing employee of the University of California, Davis (UC Davis) who prefers to live close to work in the City of Davis, but instead must live in other communities such as Woodland, Elk Grove, and Roseville, due to a lack of viable housing opportunities in the City." This statement overlooks the fact that in many two-wage earner households, it is impossible for both workers to live close to their jobs. In this case, a spouse of the UCD employee may work in Woodland, Roseville or Elk Grove, and so the decision was made to live near that person's job. People may also choose to live in locales midway between each partner's jobs. For example, I once had a colleague at a job in downtown Sacramento.

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	Page	Effect #	Issue	Comment
97-60 Cont.				He lived in Vacaville and drove daily from there to his job in Sacramento because his wife worked in downtown San Francisco. They lived in Vacaville because it was a logical mid-way point between their two jobs.
97-61	7-32		Unitrans Impact	**COMMENT:** The DEIR points out that the increased population resulting from the proposed project could result in more Unitrans riders, but could also have the effect of overstressing a portion of the bus system that already experiences on-time performance below established goals. The increased density alternative could further exacerbate this problem, as the DEIR concedes on page 7-32: "The increase in transit ridership associated with the Proposed Project was determined to have the potential to exacerbate currently deficient Unitrans performance with respect to on-time performance targets; the even greater increase in transit ridership associated with the Higher Number of Units – Same Footprint Alternative could exacerbate currently deficient Unitrans performance to a greater level." A sentiment has been expressed by some members of the community and on social media that increased transit ridership will be a key to reducing VMT. However, as noted in the DEIR, only 5 percent of Unitrans riders are non-students, and this statistic is unlikely to change in the future. Plus, it has been my experience that many of those who most aggressively promote transit have seldom used this transportation mode. I can say from many years of experience that there is nothing pleasant or enjoyable about waiting at a cold, windy and rainy bus stop or BART platform for a late-running bus or train (and likewise when it is 100 degrees).
97-62	7-41		Env Superior Alternative	COMMENT: The "Higher Number of Units – Same Footprint" alternative was identified as the Environmentally Superior Alternative, but the primary reason is almost solely based on achieving a desirable VMT per capita result. Any other considerations related to what most Davis residents would equate to quality of life (such as traffic congestion and commuting delay) are not taken into consideration. And, given how difficult VMT per capita is to understand by most lay people, it is difficult to see how this alternative would gain much traction with the electorate if selected to be the project that appears on the ballot.

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Comments - Village Farms (VF) DEIR Transportation Impact Study (TIS), Appendix R. Submitted by Greg Rowe, Planning Commissioner
MM = Mitigation Measure
Questions highlighted in yellow. **Most comments are in Bold font.**

	Page	Impact or Measure	Issue	Comment or Question
97-63	21		Per Capita VMT	Per Cap VMT is higher in outlying parts of Davis (33-36 compared to Davis average of 30.1), so how would adding 1800 units at an outlying area like VF impact VMT? It would seem that VF Per Cap VMT would be similar to other current high areas like Mace Ranch or South Davis.
97-64	70, 71	7		DEIR says: "Under Existing Plus Project conditions, the proposed project would cause a significant impact to VMT by virtue of resulting in project-generated residential VMT per capita measuring above the applicable significance thresholds relative to existing local and regional residential VMT per capita averages." This relates to question above regarding per capita VMT. In terms of cumulative impacts, it also states on p. 71 that cumulative impacts associated with the project on VMT would be **significant and unavoidable.**
97-65	25		Grade Separated Crossings	Davis is requiring new grade separated bike and ped crossings for new developments north of Covell Blvd. **Comment: If that is the case, then the applicant should be required to construct a grade separated crossing of Pole Line Road at Moore Avenue, to be operational no later than completion of Phase 2 of the proposed project.**
97-66	33-34 & 54		Same	It says that new proposed grade separated crossings (if feasible as determined through engineering analyses) would not be constructed until Phases 2, 3 or 4. Who or how would determine feasibility?
97-67	39			Project would generate 13,885 new daily trips. The project would generate 1,089 net new AM peak hour trips and 1,471 net new PM peak hour trips during a typical weekday. **The BRPA would generate even more net new trips: 15,415 daily, 1,999 weekday AM peak hour and 1,631 PM peak hour.**
97-68	46		VMT analysis	The DEIR states: "Proposed project and BRPA land uses were incorporated by updating the parcel, household, and synthetic population inputs in the SACSIM19 model". Question: what are "synthetic population inputs"?
97-69	51-52	MM 1.1	TDM	It is mentioned that the CAPCOA manual includes increased residential density as a possible means to reduce per capita VMT, but the analysis for this particular project indicated that would

97-69 Cont.

				be impractical for the City and/or the applicant. **Comment: This is a very interesting observation because thus far it appears the City Council desires increased density for this project as a means for providing more housing, yet doing so would not yield positive TDM usage.**
97-70	53		TDM	Evidence suggests that TDM is not capable of reducing trips in suburban settings like VF. Excerpt: "Available evidence suggests that conventional TDM strategies are not capable of achieving such trip reduction outcomes in suburban settings such as that of the project site." As a result, VMT impacts associated with the project would be significant and unavoidable.
97-71	54	Impact 2	Grade Separated Crossings	DEIR states: "If determined feasible through **engineering analyses at a later date**, construction of two new grade separated bicycle and pedestrian crossings, one between the project site and the North Davis Upland Habitat Area across F Street and the UPRR tracks (between Anderson Road and Grande Avenue) and a second across Pole Line Road between the project site and Nugget Fields (immediately south of Moore Boulevard). These crossings would be constructed in Phases II, III, or IV of project implementation. **Due to uncertainties regarding the timing and feasibility of these grade-separated bicycle and pedestrian crossings, neither are considered components of the project for the purposes of this analysis**." Question: What is meant by "engineering analyses at a later date? By what date, and which entity would prepare the analyses? I strongly suggest that a separate analysis be conducted now that would assume these grade-separated bike/ped crossings are part of the project, and that they would be completed no later than Phase II of the project.
97-72	56	2	Bike-Ped facilities	The DEIR states the following about the Pole Line Road/Moore Boulevard, Pole Line Road/Donner Avenue, and Pole Line Road/Picasso Avenue intersections: "… that while the project proposes to construct a roundabout at Pole Line Road/Moore Boulevard and install traffic signals at Pole Line Road/Donner Avenue and Pole Line Road/Picasso Avenue, design details regarding bicycle and pedestrian crossing amenities are not available at this time." **Comment: Pole Line Road already has high traffic volume, especially during AM and MP peak hours, and many drivers exceed the speed limit because they are in a hurry. Therefore, a roundabout at the intersection of Pole Line and Moore Boulevard is completely unacceptable. I suggest that an analysis of the interaction among vehicles, bike riders and pedestrians is incomplete in the absence of reasonable assumptions about the design and amenities associated with bike/ped crossings.**
97-73	55-56		Bike Network	The bike network will degrade.

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97-74		58	2.4	Measures	Other alternative measures that might be "determined by City Engineer." What could such measures entail or include?
97-75		59	2.6	Bike Route Pavement Markings	Bike Route Pavement Markings: It refers to green-backed sharrows. In my experience the green paint quickly degrades/fades. How often would the green pavement and sharrows be repainted in such busy bike commute corridors? Should the applicant be required to contribute to a permanent City fund dedicated to maintaining/repainting such markings?
97-76		60-61, 74	Impact 9	Bus usage	There is very little bus usage now in Davis and in the area near VF. There is only a very small projected increase, so it should not be assumed that transit will help resolve traffic, air quality or GHG emission concerns to an appreciable degree. This observation is borne out by the following quote on p. 74 regarding cumulative impacts: "Under cumulative conditions, substantial increases in background vehicle travel activity would occur on study area roadways due to reasonably foreseeable land use development elsewhere in and around Davis. Together with the increase in vehicle travel activity caused by the project, this would cause adverse effects to transit operations by increasing transit service delay and running times in a manner inconsistent with Unitrans performance standards".
97-77		61		Bus usage	The Unitrans P and Q lines already have big delays during AM and PM commutes, particularly related to traffic on Mace, so why would anyone living at VF want to use them? The inability of the transit system to significantly alleviate travel patterns and time is reflected by the fact that currently only about 5% of **Unitrans passengers are non-UCD students (p. 27); hence such transit service has little appeal or usefulness to commuters going to/from locations other than UCD.**
97-78		53, 64, 71	3.2, 7.1	TDM	DEIR admits that the effectiveness of the identified TDM strategies is unknown, and in turn, subsequent trip reduction effects, so the impacts would remain significant and unavoidable. It is pointed out on page 53 and 71 that success of TDMs also depend on level of adoption by private entities and agencies; i.e., the extent to which people carpool and whether transit agencies increase service, which are out of the control of the applicant or city. As a result, it states on p. 70 that cumulative impacts associated with the project on VMT would be significant and unavoidable.
97-79		65	4	Emergency vehicles	DEIR says that the applicant will install traffic signals at the intersections of Pole Line Road and Picasso and Donner. The DEIR admits on this page that the project will increase peak hour vehicle volume and delays. These 2 intersections are close to each other. Wouldn't having signalized

3

Letter 97 Cont.

97-79 Cont.

97-80

97-81

				intersections this close to each other cause large traffic backups (and idling emissions), especially during AM and PM commutes?
	72	9.2	Transit Service	Specific plans and funding for improved transit service are unknown at this time. Comment: It is therefore not prudent to assume that transit service could significantly reduce impacts associated with the project.
	79-81	MM 11.7	Intersection Improvements	The project would impact traffic congestion at intersections such as Covell/Mace and I-80 and Mace/Chiles Road. The DEIR says that "...since the remaining fair share contributions needed for the construction of these improvements have not been identified by the relevant lead agency, fair share payment by the project applicant would not ensure construction. Therefore, the implementation and effectiveness of Mitigation Measure 11.7 cannot be guaranteed and this impact would be considered significant and unavoidable." **This means that if projects such as Shriners and "At the Curve" do not get Measure D voter approval, the proposed mitigation measures would most likely never occur.**

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4

LETTER 97: GREG ROWE (LETTER 2 OF 7, 02/08/25)

Response to Comment 97-1

The future intersection of Pole Line Road/Village Farms Road North would be side street stop controlled on the Village Farms Road North eastbound approach, which would have a separate left turn lane and right turn lane. A left turn pocket would be provided for northbound vehicles on Pole Line Road. A right turn pocket would not be provided for southbound vehicles on Pole Line Road. All movements would be allowed at the intersection.

Response to Comment 97-2

The wetland analysis contained in the Draft EIR was prepared by Madrone Ecological Consulting using current site conditions. Pursuant to CEQA Guidelines Section 15125(a), CEQA defines the environmental baseline, upon which to assess project impacts, on the physical conditions of the site at the time of release of the Notice of Preparation (NOP). The NOP for the Village Farms project was released by the City of Davis on October 24, 2023.

Madrone prepared an Aquatic Resource Delineation (ARD) in accordance with the USACE Wetlands Delineation Manual (1987), the Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Arid West Region (Version 2.0) (2008), A Field Guide to the Identification of the Ordinary High Water Mark (OHWM) in the Arid West Region of the Western United States (2008), and the USACE Sacramento District's Minimum Standards for Acceptance of Preliminary Wetlands Delineations (2016).

The wetland analysis contained in the 2004 Covell Village EIR is based on outdated information that is over 20 years old. Therefore, there is no requirement, nor would it be reasonable to consult the Covell Village EIR in an effort to inform the wetland analysis for the Village Farms EIR.

Response to Comment 97-3

Please see Master Response 6 – Grade-Separated Crossings.

Response to Comment 97-4

Please see Master Response 6 – Grade-Separated Crossings.

Response to Comment 97-5

The commenter is quoting a statement in the section of the Introduction chapter where NOP comments are summarized. The referenced "groundwater recapture basins" were an initial project concept feature at the time the NOP was released, but these features have since been removed from the project description, and thus, are not evaluated in the Draft EIR.

Regarding soil and groundwater contamination concerns, please see Master Response 3.

Response to Comment 97-6

The entirety of the vehicle miles traveled (VMT) discussion in the EIR is focused on VMT per capita, thus, there it is not necessary to make the requested text revision. For example, page 4.13-12 of the Draft EIR states:

> The key VMT metric used for the following analysis is residential VMT per capita, which is defined as all automobile (i.e., passenger cars and light-duty trucks) vehicle-trips that start

> or end at the home, but non-home-based trips made by residents elsewhere on the network are excluded.

In addition, the discussion of the Agricultural Resource Preservation Alternative (Draft EIR, page 7-25), states:

> The reduced density under this Alternative would result in increased VMT per capita as compared to the Proposed Project, as follows: 42.7 VMT per capita (Alternative) vs. 31.5 VMT per capita (Proposed Project). Therefore, even with implementation of Mitigation Measures 4.13-4 and 4.13-9, the Alternative would result in a greater impact related to VMT (i.e., conflicting with CEQA Guidelines Section 15064.3, subdivision (b)), and the impact would remain significant and unavoidable and cumulatively considerable and significant and unavoidable.

As demonstrated, the context is more than sufficient for the reader to understand that the focus of the analysis is per capita VMT.

Response to Comment 97-7

First, it is important to emphasize that drainage reports have already been prepared for the Proposed Project and the BRPA.[1] Mitigation Measure 4.8-4 pertains to the preparation of a design-level drainage report, which cannot be prepared at this time given the fact that the applicant is only seeking program-level entitlements for the project (e.g., annexation, General Plan land use and zoning changes, etc.). As such, the appropriate time for a design-level drainage report will be when a tentative subdivision map has been prepared. The tentative subdivision map will include street, lotting, and utilities layouts, finished grades, etc., all of which will be needed to refine the programmatic drainage analysis that has been prepared for the Draft EIR.

Under CEQA, a lead agency may rely on future studies to devise the specific design of a mitigation measure when the results of later studies are used to tailor mitigation measures to fit on-the-ground environmental conditions.[2]

Mitigation Measure 4.8-4 includes sufficient performance standards, as follows:

> *The drainage report shall identify specific storm drainage design features to control the 200-year, 10-day increased runoff from the project site to ensure that the rate of runoff leaving the developed site does not exceed the pre-project condition. This may be achieved through: on-site conveyance and detention facilities, storage within the on-site UATA, or equally effective measures to control the rate and volume of runoff.*
>
> *The design-level drainage report shall perform an updated net impact evaluation of downstream East Davis Ponding, taking into consideration the final onsite storm water system design, when the downstream flow is blocked by high water levels in the Willow Slough Bypass. The final amount of runoff volume to be detained would be determined*

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1 Cunningham Engineering. *Drainage System and Flood Control Analysis for Village Farms Davis*. August 8, 2024; Cunningham Engineering. *Drainage System and Flood Control Analysis for Village Farms Davis Biological Resources Preservation Alternative*. August 8, 2024; Rick Engineering Company. *Village Farms Project: 2-Dimensional Hydraulic Modeling*. July 8, 2024; Rick Engineering Company. *Village Farms Project: Biological Wetland Avoidance Alternative: 2-Dimensional Hydraulic Modeling*. July 8, 2024.

2 See *Save Panoche Valley v. San Benito County* (2013) 217 Cal.App.4th 503, 524 (upholding mitigation measures, based on preconstruction surveys, requiring identified steps for avoiding impacts to biological resources to be implemented).

with the design-level drainage report. This could result in detaining run-off volume for an extended time period.

In summary, Mitigation Measure 4.8-4 includes sufficient performance standards and is appropriately timed to when sufficient project-level design information is available to refine, as needed, the programmatic drainage reports prepared for the Draft EIR.

Response to Comment 97-8

The commenter states that a roundabout at the intersection of Pole Line Road and Moore Boulevard would be dangerous for pedestrians and bike riders, and that a grade-separated bicycle and pedestrian crossing of Pole Line Road should replace the roundabout. Roundabouts are designed with horizontal and vertical features to reduce vehicle speeds on all approaches and through the roundabout to 15 to 20 miles per hour. Reducing vehicle speeds is a key element of improving travel safety for all travelers, particularly pedestrians and bicyclists. The City of Davis 2023 Local Road Safety Plan (LRSP) identifies roundabouts, advanced warning signs, retroreflective back plates, blank-out signs, and grade-separated bicycle crossings as safety countermeasures for broadside collisions, unsafe speed, and traffic signals and signs violations.

Please see Master Response 6.

Response to Comment 97-9

Please see Master Response 6.

Response to Comment 97-10

Please see Master Response 1. In addition, an existing crossing of Covell Boulevard can be accessed through Cannery Loop.

Response to Comment 97-11

The on-site stormwater system incorporates detention, which, unlike a retention system, does not hold water for extended periods of time. Applicable state and local stormwater standards require detention basin systems to release stormwater runoff into the downstream system such that mosquitoes do not have sufficient time to breed.

Regarding the contamination concerns, please see Master Response 3.

Response to Comment 97-12

The commenter's request for how many people will reside in the various housing units is not necessary to ensure an adequate environmental analysis. The Draft EIR includes a population estimate in Chapter 4.11, Population and Housing, for the project based on information contained in the City's planning documents.

Response to Comment 97-13

Please see Master Response 1.

Response to Comment 97-14

The fire station response time comparison requested by the commenter is not necessary. The on-site location of the fire station was selected in coordination with the Davis Fire Department. In addition, the Draft EIR includes Figure 4.12-1 within Chapter 4.12, Public Services and Recreation, which shows the Davis Fire Department Four-Minute Drive Time Zones.

Response to Comment 97-15
Please see Master Response 6.

Response to Comment 97-16
Please see Master Response 4.

Response to Comment 97-17
Please see Master Response 1.

Response to Comment 97-18
Please see Master Response 4.

Response to Comment 97-19
Please see Master Response 6.

Response to Comment 97-20
Please see Response to Comment 96-1.

Response to Comment 97-21
Please see Master Response 1.

Response to Comment 97-22
Please see Master Response 6. In addition, determination of General Plan policy consistent is ultimately within the purview of the City Council. The comment has been forwarded to the decision-makers for their consideration.

Response to Comment 97-23
Please see Master Response 5, section entitled “Project Effect on Region-Wide VMT”.

Response to Comment 97-24
Mitigation Measure 4.3-7(b) refers to modifying the construction schedule to reduce the intensity of construction. This could be accomplished by lengthening the period of construction so that a smaller construction fleet would be necessary to carry out construction on a daily basis. A smaller fleet would equate to fewer construction-related emissions. The mitigation measure specifies the monitoring entity, which would be the City of Davis, as follows:

> *Prior to the initiation of construction of Phase 1 the BRPA, the project applicant shall demonstrate that construction-related GHG emissions would be reduced to 1,100 $MTCO_2e/yr$ and shall submit proof to the City of Davis Community Development Department.*

As can be seen, prior to initiating construction, the applicant shall demonstrate to the City of Davis, the means by which they will satisfy Mitigation Measure 4.3-7(b). If the applicant proposes a modified construction schedule, the City of Davis will be able to field-verify that construction is being carried out in compliance with the modified construction schedule. This is part of the normal mitigation monitoring and reporting that lead agencies are required to carry out to ensure that a project applicant is satisfying the mitigation obligations placed on their project.

Response to Comment 97-25

The portion of Mitigation Measure 4.3-7(b) referred to by the commenter pertains to overlapping of construction phases. The applicable threshold for construction GHG emissions is metric tons CO_2 equivalent per year. The intent of this requirement is to limit the overlapping of construction phases within any given year.

Response to Comment 97-26

The portion of Mitigation Measure 4.3-7(b) referenced by the commenter is only one of the available means of complying with the mitigation measure. Thus, even if the applicant does not select the carpool/shuttle van/etc. component of the measure, there are other satisfactory measures that can be successfully implemented to reduce the project's construction GHG impact to a less-than-significant level.

Response to Comment 97-27

Please see Master Response 5.

Response to Comment 97-28

Comment noted. The TDM measures referenced in Mitigation Measure 4.3-8 are not relied upon to reach a less-than-significant conclusion concerning the project's operational GHG emissions impact. The impact is determined to be significant and unavoidable for the reasons set forth in the Draft EIR.

Response to Comment 97-29

Please see Master Response 5.

Response to Comment 97-30

Chapter 4.7, Hazards and Hazardous Materials, of the Draft EIR, clearly discusses the Old Davis Landfill at length (see for example, pg. 4.7-1, 4.7-26, 4.7-30).

The commenter notes that they "…could not find any information in Draft EIR Chapter 4.7 indicating whether the concerns expressed by the RWQCB relative to PFAS have been addressed." PFAS are clearly addressed in Chapter, 4.8, Hydrology and Water Quality, of the Draft EIR (e.g., pg. 4.8-9, 4.8-22).

Please also see Master Response 3.

Response to Comment 97-31

The Standard of Practice for environmental investigations such as these is to follow relevant and applicable regulatory guidance, which was done for the Proposed Project. Sampling of the upper six inches of soil is appropriate to evaluate residual pesticide compounds in soil that may be present as a result of surface application, according to the California Department of Toxic Substances Control (DTSC) *Interim Guidance for Sampling Agricultural Properties (Third Revision)* dated August 7, 2008. Multiple groundwater monitoring samples at various depths have been conducted to characterize potential Old City Landfill effects, as discussed in Sections 2.2.5, 4.2.1, and 8.2.5 of Geocon's *Phase I ESA* (Appendix F to the Draft EIR) for the proposed development area (February 14, 2024), and in Geocon's *Drainage Channel Evaluation* (July 23, 2024, Appendix O to the Draft EIR) and in Chapter 4.8, Hydrology and Water Quality, of the Draft EIR.

Response to Comment 97-32
Soil sampling was conducted to evaluate soil conditions, and groundwater monitoring was conducted to characterize the groundwater quality and flow direction. The results of groundwater monitoring demonstrate that contaminated groundwater from the landfill flows beneath the proposed development area and the adjacent Wildhorse residential subdivision, but does not flow beneath the agricultural buffer area. Please see Master Response 3 related to hazards.

Response to Comment 97-33
Please see Master Response 4, which provides an overview of the Draft EIR's drainage analysis and demonstrates that the project's drainage system would accommodate project runoff and not induce off-site flooding that could adversely affect existing structures.

Response to Comment 97-34
Please see Response to Comment 97-33.

Response to Comment 97-35
Please see Response to Comment 97-33.

Response to Comment 97-36
Please see Master Response 3.

Response to Comment 97-37
Please see Master Response 3.

Response to Comment 97-38
Please see Master Response 3.

Response to Comment 97-39
Please see Master Response 4.

Response to Comment 97-40
While the City has experienced some flooding in the past along West Covell Boulevard during extreme rain events, this was mostly due to runoff coming into the City from areas outside the City's boundaries. Although the entire length of the Covell Channel is not 100 percent City maintained, areas within the City's responsibility are maintained regularly to ensure continued stormwater flow. Caltrans maintains the channel from John Jones Road to State Route 113, then north and under the highway, where the City takes back maintenance responsibilities when the channel is back in city limits. In addition to standard City practice in maintaining drainage channels within City responsibility, action has been taken to remedy the situation at West Covell Boulevard and design changes were incorporated into the Bretton Woods project to help eliminate those issues. There is an overflow weir on the Covell Channel that will allow water to flow into the Bretton Woods perimeter channel before it reaches flood levels.

Response to Comment 97-41
Please see Master Response 4.

Response to Comment 97-42
Please see Response to Comment 97-40.

The City's stormwater program is operated as a self-supporting enterprise fund. Revenues are derived primarily from service charges, and fund the stormwater operating and capital programs. In 2022, a rate adjustment for the stormwater utility was implemented to ensure that rates were commensurate with service level expectations and operational needs. Enterprise funds can only be used for the program supported by the rates, there is no competition for these funds as can be the case for programs supported by the City's general fund. The rate adjustment included additional funding necessary to support the City's channel maintenance activities.

Response to Comment 97-43

Please see Master Response 1 as farmland conservation easement details are not required to be included in an EIR. The easements will comply with applicable local regulations.

Response to Comment 97-44

Please see Master Response 6.

Response to Comment 97-45

Please see Master Response 6.

Response to Comment 97-46

The comment primarily pertains to the grade-separated crossing of Pole Line Road, which is addressed in Master Response 6.

Regarding the commenter's estimated student population for the project, Chapter 4.12, Public Services and Recreation, includes an estimated student population for the project based on the generation rates included in Table 5C-6 of the City's General Plan EIR. The total student population for the project is estimated at 1,040 for the Proposed Project and 1,153 for the BRPA. It is noted that at the DJUSD's November 7, 2024 Board Study Session on Boundary/Enrollment, the project's student population was estimated to be 701 students. While the Draft EIR's estimate is considerably higher, it amounts to a more conservative analysis, which is permissible under CEQA.

Response to Comment 97-47

Please see Response to Comment 52-6.

Response to Comment 97-48

Please see Master Responses 1 and 5.

Response to Comment 97-49

The trip comparison request is beyond the scope of what is required for an EIR. The requested trip distribution information is related to assigning traffic volumes on the roadway network, which relates to congestion and intersection level of service, which is no longer a requirement pursuant to CEQA. Please see Master Response 5 for further discussion on this point. Trip distribution information is provided in the non-CEQA Local Transportation Analysis (LTA) that was prepared for the project and available on the City's website at:

https://www.cityofdavis.org/city-hall/community-development/development-projects/village-farms-davis

Response to Comment 97-50

The description of the VMT analysis references centroid connectors and synthetic population inputs. The VMT forecasts in the Draft EIR were derived from forecasts prepared using the regional travel demand model developed by the Sacramento Area Council of Governments (SACOG). The SACOG model is known as SACSIM, which predicts how people in the six-county region travel on a typical weekday, including where they go, when they make trips, why they make trips, what modes they use, and more. SACSIM19 is the current version of the regional model that was used for the VMT forecasts. SACSIM is an activity-based model that estimates the interrelated travel behavior of a synthetic population of individuals for every individual household. The modeling process creates synthetic or artificial population data by expanding on a representative sample of persons with attributes such as gender, age, ethnicity, etc.

The six-county SACSIM model area is disaggregated into zones that are geocoded and include the land use details for the defined area of each zone. The model also has a geocoded transportation network. Centroids are the center of the zones, and each zone has one or more "centroid connectors" that load trips generated by the zone's land uses onto the model's transportation network.

Response to Comment 97-51

Please see Master Response 6.

Response to Comment 97-52

Please see Master Response 5.

Response to Comment 97-53

The mitigation measures that include installation of high visibility crosswalk markings are all for locations outside the project boundary at existing intersections or driveways. They are consistent with improvements identified in the East Covell Corridor Plan.

The Federal Highway Administration (FHWA) Proven Safety Countermeasure Initiative (PSCi) is a collection of 28 countermeasures and strategies effective in reducing roadway fatalities and serious injuries.[3] The safety countermeasures include a number of signal, sign and pavement striping measures including crosswalk visibility enhancements.

Response to Comment 97-54

The FHWA indicates that installation of crosswalk visibility enhancements has safety benefits.[4] Studies have indicated that high-visibility crosswalks can reduce pedestrian injury crashes up to 40 percent, intersection lighting can reduce pedestrian crashes up to 42 percent, and advance yield or stop markings and signs can reduce pedestrian crashes up to 25 percent.

The Oregon Department of Transportation Crash Reduction Factor Manual (January 2023 edition)[5] and Crash Modification Factors Clearinghouse[6] indicates that installing green bike lanes at conflict points in urban areas can reduce bicycle crashes at all severities up to 39 percent.

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3 https://highways.dot.gov/safety/proven-safety-countermeasures
4 https://highways.dot.gov/safety/proven-safety-countermeasures/crosswalk-visibility-enhancements
5 www.oregon.gov/odot/Engineering/ARTS/CRF-Manual.pdf
6 https://cmfclearinghouse.fhwa.dot.gov/results.php

Response to Comment 97-55

The existing Class I path crossings at each of the three driveways for Oak Tree Plaza on East Covell Boulevard have a warning sign for the Class I path for right turn entering vehicles, a stop sign and stop bar prior to the Class I path for exiting vehicles, and nearby lighting.

The trees located between the path and parking lot do not obscure the visibility of vehicles entering the parking lot as they are located between the path and the parking lot. A row of trees is located just west of the easternmost driveway, but not in proximity to the central and westernmost driveway. It is possible that the trees may obscure the view of exiting motorists at the easternmost driveway of eastbound cyclists on the path. There is a stop sign and stop bar, though, for exiting vehicles just before the path at the easternmost driveway, where exiting vehicles can only make a right turn onto eastbound East Covell Boulevard.

The East Covell Corridor Plan recommends the installation of high visibility markings at the three path crossings and those measures are incorporated into the mitigation measure. FHWA has indicated that studies have shown that high-visibility crosswalks can reduce pedestrian injury crashes up to 40 percent.

Response to Comment 97-56

Please see Master Response 3. In addition, shallowest depth to water levels in this area are always winter (December/January/February) with greatest depths in summer (June/July/August) when groundwater levels are at their lowest. Groundwater levels are tracked in intermediate and deep wells and during dry conditions there is a general decline in groundwater levels. However, groundwater levels do not substantially recover during wet years. It is important to note that there are a lot of variables in how/when groundwater levels in an aquifer recover, especially when that aquifer is utilized by many wells and groups, such as agriculture/farming, City, UC Davis, and private domestic well owners. To “recover” means to reach the same groundwater levels (depth to water) that was achieved prior to the dry years/drought. Most wells in the area eventually do recover; however, there have been significantly more dry years than wet years in this region and recovery normally takes years for a single dry year. The City of Davis Public Works Department reviewed Yolo Subbasin Groundwater Agency (YSGA) data, which illustrates that average depth to water does fluctuate but has not risen to levels that typically infiltrate stormwater basins.

Response to Comment 97-57

Regarding PFAS, please see Master Response 3. The applicant would be responsible for all necessary water infrastructure to serve the project.

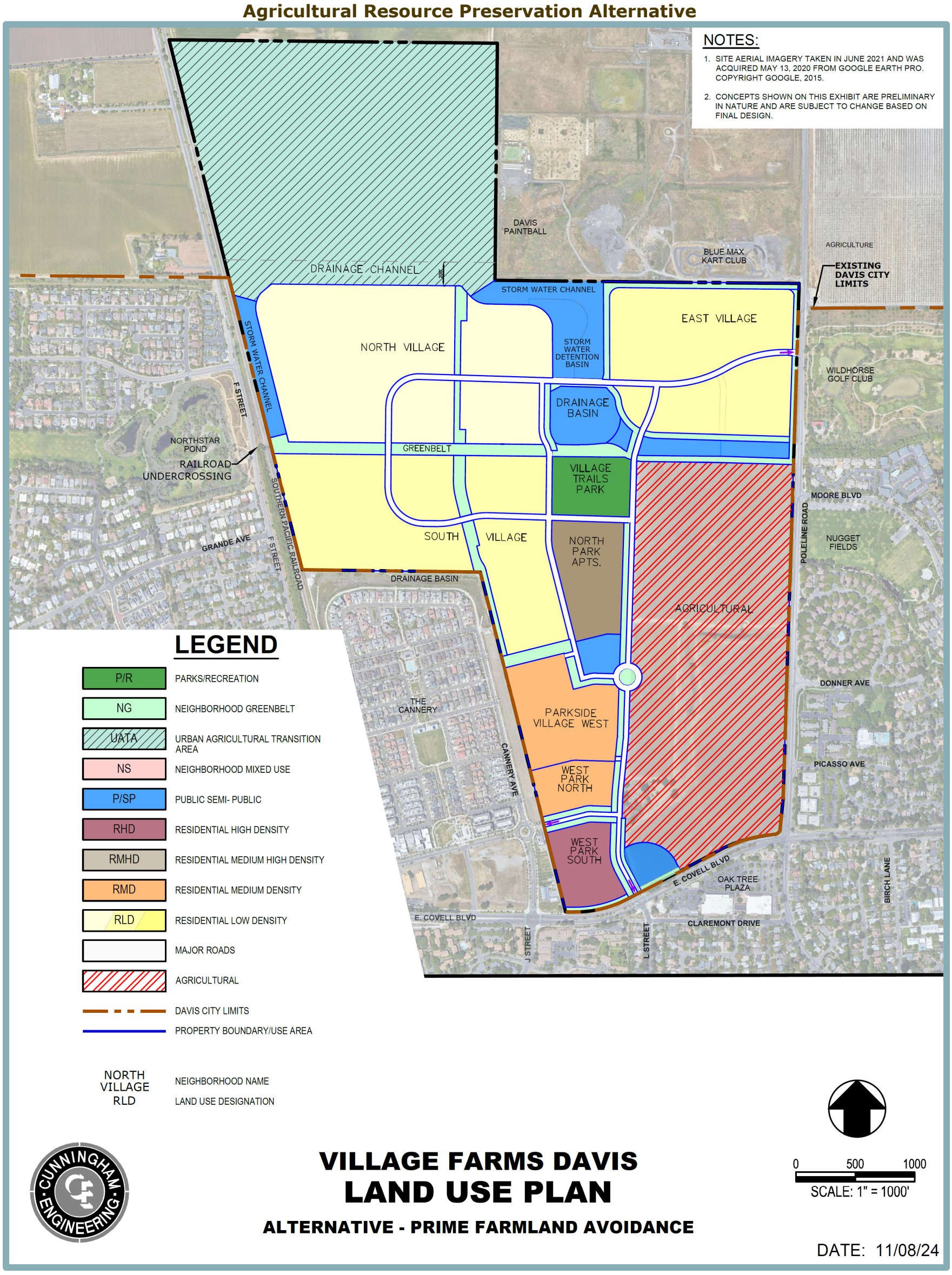
Response to Comment 97-58

The legend in Figure 7-2 within Chapter 7, Alternatives Analysis, of the Draft EIR inadvertently labeled the agricultural preserve area as “Major Roads.” The figure has been revised to correct the label to “Agriculture.” Please see Figure 2-3 below for the revised Figure 7-2. The revision is for clarification purposes only and does not affect the analysis nor conclusions of the Draft EIR.

Response to Comment 97-59

Please see Master Response 2. As discussed therein, the 2004 Covell Village EIR included an equal-weight analysis of a High Density Alternative, which included a total of 1,990 residential units, in comparison to the 1,515-unit total for the Covell Village project. As noted correctly in the comment, the Higher Number of Units – Same Footprint Alternative was intended to reduce per capita VMT below both City and regional average VMT thresholds.

Figure 2-3 (Revised Figure 7-2)
Agricultural Resource Preservation Alternative



Response to Comment 97-60
The VMT forecasts in the Draft EIR were derived from forecasts prepared using the regional travel demand model developed by SACOG. The SACOG model is known as SACSIM, which predicts how people in the six-county region travel on a typical weekday, including where they go, when they make trips, why they make trips, what modes they use, and more. SACSIM19 is the current version of the regional model that was used for the VMT forecasts. SACSIM is an activity-based model that estimates the interrelated travel behavior of a synthetic population of individuals for every individual household. The modeling process creates synthetic or artificial population data by expanding on a representative sample of persons with attributes such as gender, age, ethnicity, etc. The model includes a range of household types including two-worker households and accounts for the vehicle travel characteristics of different household types (ranging from retirees, single-worker households, and multiple worker households) in the development of VMT forecasts.

Response to Comment 97-61
Please see Response to Comment 52-6.

Response to Comment 97-62
Comment noted. In addition, as noted in Master Response 1, quality of life concerns, while important, are not CEQA considerations.

Response to Comment 97-63
Please see Master Response 5.

Response to Comment 97-64
The comment reiterates statements from the Draft EIR. Please see Master Response 1.

Response to Comment 97-65
Please see Master Response 6.

Response to Comment 97-66
Please see Master Response 6.

Response to Comment 97-67
Please see Master Response 1.

Response to Comment 97-68
Please see Response to Comment 97-60.

Response to Comment 97-69
The Proposed Project/BRPA has been increased in density from 1,395 to 1,800 dwelling units in response to early feedback from the City Council, as discussed on page 7-12 of the Draft EIR. Such increased density does have a beneficial effect of reducing the project's VMT per capita. Further densification beyond Council's request was considered in the Higher Number of Units – Same Footprint Alternative to reduce the project's VMT impact.

Response to Comment 97-70

Please see Master Response 1.

Response to Comment 97-71

Please see Master Response 6.

Response to Comment 97-72

The Proposed Project/BRPA includes a roundabout at the Pole Line Road/Moore Boulevard intersection. Mitigation Measure 4.13-2(c) includes the following description of the associated requirements:

> *The project applicant shall construct a roundabout with pedestrian and bicycle crossings on all legs at the Pole Line Road/Moore Boulevard intersection. Bicycle and pedestrian crossings shall be placed through the splitter islands for each roundabout approach to minimize the number of multi-lane crossings, and shall be designed to the satisfaction of the City Engineer. In addition, the project applicant shall install traffic signals and pedestrian crossings on all legs at the Pole Line Road/Donner Avenue and Pole Line Road/Picasso Avenue intersections.*

Roundabouts are identified in the City of Davis 2023 LRSP and the US Department of Transportation (DOT) as a safety countermeasure for intersections and uncontrolled crossings.

> *Roundabouts can be implemented in urban areas under a wide range of traffic conditions. They can replace signals, two-way stop controls, and all-way stop controls. Roundabouts are an effective option for managing speed and transitioning traffic from high-speed to low-speed environments, such as along high-speed roads.*[7]
>
> *Roundabouts provide substantial safety and operational benefits compared to other intersection types, most notably a reduction in severe crashes.*

The US DOT provides guidance on roundabout design in *Roundabouts: An Informational Guide*[8]. The guide notes that key roundabout features include yield control of entering traffic, channelized approaches, and appropriate geometric curvature to slow speeds. This includes a raised central island, splitter islands to separate entering from exiting traffic, yield lines at the point of entry to the circulatory roadway, and accessible pedestrian crosswalks that are set back from the yield line. The recommended maximum entry design speed for urban single lane roundabouts is 20 miles per hour. Pursuant to the Guide, "The process of designing roundabouts, more so than other forms of intersections, requires a considerable amount of iteration among geometric layout, operational analysis, and safety evaluation." Detailed design plans are not available for the proposed roundabout, or for other proposed intersection mitigations, and will be reviewed by the City Traffic Engineer when submitted as noted in the mitigation measure to confirm that they meet appropriate standards.

Response to Comment 97-73

Please see Master Response 1.

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7 https://highways.dot.gov/safety/proven-safety-countermeasures/roundabouts#:~:text=They%20can%20replace%20signals%2C%20two,intersections%20along%20high%2Dspeed%20roads.

8 www.fhwa.dot.gov/publications/research/safety/00067/00067.pdf

Response to Comment 97-74

The mitigation measure identifies specific improvements "or a set of improvements of equal effectiveness as determined by the City Engineer". This language is an acknowledgement that new measures, materials, or technologies may be developed during the course of the build-out of the project, as build-out is likely to occur over several phases, and provides the flexibility to implement different measures that are equally or more effective as determined by the City Engineer.

Response to Comment 97-75

The development will pay roadway impact fees, which goes towards roadway improvements. The green pavement and sharrows will be methyl methacrylate which may darken due to tire degradation, but should still last for many years. The exact time it would take for the pavement markings to fade is estimated to be five to 10 years.

Response to Comment 97-76

Please see Master Response 1.

Response to Comment 97-77

Please see Master Response 1.

Response to Comment 97-78

Please see Master Response 1.

Response to Comment 97-79

Please see Master Response 5. The operations analysis in the LTA is not related to CEQA impacts or mitigations. The evaluation concludes that the project's proposed roundabouts would contribute to extensive queuing given the close spacing of the two adjacent intersections on Pole Line Road at Picasso and Donner. Signalization of these intersections would improve the progression and management of traffic on northbound and southbound Pole Line Road. Vehicle queues/delay would be more evenly distributed across each intersection and queue spillbacks and associated upstream intersection blockages would be reduced with the installation of traffic signals. The analysis was based on application of the SimTraffic micro-simulation model and the traffic signals on Pole Line Road are assumed to be interconnected.

Response to Comment 97-80

The Draft EIR does not assume that transit service could significantly reduce impacts associated with the project. As previously discussed, External Walk, Bike, and Transit reductions applied in the project's trip generation estimate (Table 4.13-5) were kept considerably low.

Response to Comment 97-81

The project's fair share contribution toward the cumulative impact (see Impact 4.13-11 of the Draft EIR) would be collected by the City, but the ability to construct the improvements remains uncertain, which is clearly acknowledged in the Draft EIR. For this reason, the impact is conservatively determined to be significant and unavoidable in the Draft EIR.

Letter 98

MEMO

TO: Dara Dungworth, Principal Planner – City of Davis
FROM: Greg Rowe, Planning Commissioner
DATE: **REVISED** February 12, 2025
SUBJECT: CONCERNS ABOUT ALTERNATIVES ANALYSIS – VILLAGE FARMS DEIR AND THE ALTERNATIVE THAT SHOULD HAVE BEEN CONSIDERED

This memo conveys concerns about the adequacy , veracity and integrity of the Alternatives Analysis presented in Chapter 7 of the Draft Environmental Impact Report (DEIR) for the proposed Village Farms project ("Project"). As such, please consider this memo as an objection to the manner in which the Alternatives Analysis was conducted, particularly the alternatives selected for evaluation.

As explained below, I contend that the DEIR for the Project should have evaluated a "Reduced Acreage Alternative" similar to alternative that was identified as the Environmentally Superior Alternative in the December 2004 DEIR for the Covell Village project that had been proposed for the same site. As pointed out in the comments I have submitted thus far on the Project, significant concerns are evident with regard to potential contamination associated with the former Davis Landfill, along with other factors.

98-1

Evaluation of a Reduced Acreage alternative, similar to what appears in Chapter 5 of the 2004 Covell Village DEIR, would have produced illuminating results, and probably a far lower number of potential impacts, for consideration by the Planning Commission and City Council. Instead, it appears that a predetermined alternative was selected because its results for just one criteria-- VMT per capita-- provides a justification for a denser project even if it excludes other important considerations.

1. **CEQA REQUIREMENTS**
   a. The California Environmental Quality Act (CEQA) requires that a DEIR examine the potential impacts of "...a range of reasonable alternatives to the project, or to the location of the project" and "...evaluate the comparative merits of the alternatives."[1] The range of alternatives must include alternatives that are potentially feasible, would meet most or all of the project objectives, and that would "...avoid or substantially lessen" one or more of the project's significant impacts."[2]

98-2

2. **ALTERNATIVES CONSIDERED AND EVALUATED IN THE PROJECT DEIR:**
   a. Biological Resources Preservation Alternative (BRPA), which is the equal weight alternative.
   b. No Project.
   c. Lower Number of Units – Same Footprint
   d. Agricultural Resource Preservation Alternative

[1] CEQA Guidelines 15126.6.
[2] Antero Rivasplata and Greta Brownlow. *Practical CEQA – A Stepwise Guide to CEQA Compliance*. Solano Press Books, 2020. Page 100.

98-2 Cont.

e. Higher Number of Units – Same Footprint
f. Of-Site Project

3. **ENVIRONMENTALLY SUPERIOR ALTERNATIVE (ESA)**: The "Higher Number of Units – Same Footprint Alternative" was determined to be the ESA.
   a. Concerns About This Alternative: I have been involved in evaluating, commenting on, writing and editing EIRs since the mid-1980s, when I served on and chaired the Resource Conservation Commission in the City of Chula Vista, CA. In the decades since then, I have never encountered a DEIR in which an alternative encompassed an intensity of development 50% greater than the proposed project. Yet, that is the case with the "Higher Number of Units – Same Footprint" alternative. It increases the number of units from 1800 to 2700.

98-3

Alternatives are traditionally selected to see if fewer impacts could be attained. However, due to the peculiarities associated with VMT per capita analysis, selecting an alternative with dramatically more intense development can counter-intuitively produce a "better result" for at least one impact, in this case emissions of GHG and criteria pollutants. I believe this skews the analysis in an unintended fashion.

If it was felt that a higher intensity alternative was needed for comparative purposes, I respectfully submit that a more reasonable range would have been between 10 and 20% more residential units than the Project. A jump of 50% is beyond the realm of reason.

   b. Population Increase: Using the average household size in Davis, the Project and the BRPA would have 4,626 residents, whereas the ESA would have 6,939 residents, an increase of 2,313 residents along with the attendant increase in the number of vehicles accommodated on the site, plus the other impacts associated with a population escalation of this magnitude.

   c. Rationale for Selection of the "Higher Number of Units – Same Footprint Alternative." The primary (and perhaps sole) environmental benefit of this alternative is that it would produce fewer impacts related to Air Quality, GHG Emissions and Energy compared to the Project (DEIR, page 7.28). In other words, an outside objective observer could reasonably conclude that the sole justification for assuming a 50% increase in the number of units was to achieve an enhanced VMT result, which is essentially conceded on page 7-31 of the DEIR. See footnote 3, which is an excerpt from my comments on Chapter 7, dated 9 February 2025.[3]

98-4

[3] It appears that the only justification for assuming a 50% increase in the total number of units alternative entails was to achieve a "better" VMT per capital result from the standpoint of the CAPCOA handbook, as conceded by the following statement on page 7-31: "The 2,700-unit count was selected for the Alternative in order to reduce per capita VMT below both City and regional average VMT thresholds of 30.1 and 21.7 VMT per capita, respectively. The residential VMT per capita associated with the Proposed Project was calculated to be 31.5." The rationale for selecting this alternative is in fact

From this perspective, it appears that the range of alternatives selected for analysis intentionally sacrificed consideration of other legitimate alternatives strictly to enable attainment of VMT goals that would justify a massive increase in the project's intensity. This meant that other potential impacts were placed in a subordinate role.

98-4 Cont.

d. Based on the above, a knowledgeable and objective observer could find it reasonable to conclude that the number of units selected for this alternative was based primarily on a desire to achieve a pre-determined outcome; i.e., providing a rationale for dramatically increasing the density of the project. (In other words, "just keep arbitrarily increasing the number of units until VMT per capita reaches a level that justifies density we want.")
   i. Based on my years of working professionally with CEQA, I don't think this is the way the process is supposed to work. I won't go so far as to say the process has been corrupted, but I do believe it has been unduly influenced and compromised by considerations outside the realm of conducting an impartial environmental analysis.

4. **THE MISSING ALTERNATIVE THAT SHOULD HAVE BEEN INCLUDED**:
   a. The Former Environmentally Superior Alternative: I contend that a vitally important alternative should have been included, and that the Project DEIR falls short of the standard of practice because of its failure to include this alternative. That is, the DEIR should have considered an alternative essentially identical to the Environmentally Superior Alternative identified in the DEIR for the Covell Village Project that was prepared by Raney Planning and Management in December 2004.[4] Unlike any of the alternatives considered in the Project DEIR, this alternative would have taken into account: (1) the presence of soil and groundwater contamination associated with the former Davis Landfill; (2) jurisdictional wetlands; (3) potential flooding associated with Channel A.

   b. Reduced Acreage Alternative: The ESA identified in the 2004 DEIR was "Alternative 8: Reduced Acreage Alternative."[5] As stated in the DEIR, this alternative would have resulted in development of 1,515 single family units on the portion of the project site south of Channel "A". As stated on page 5-11, "The Reduced Alternative would not result in land use incompatibility impacts regarding the Davis Landfill because the Alternative would not result in development north of Channel". "Overall, the Reduced Acreage Alternative would have fewer land use impacts compared to the Proposed Project."

98-5

admitted in the DEIR on page 7-33, as follows: *"This Alternative's analysis places primary importance on the elimination of the Proposed Project's significant and unavoidable (project-level and cumulative) VMT impacts. (Italics added for emphasis.)*

[4] Draft Program Level Environmental Impact Report, Covell Village. City of Davis. SCH#2004062089.
[5] Covell Village DEIR, pages 5-10 through 5-15.

Letter 98 Cont.

98-5 Cont.

98-6

c. In addition, "…because the Reduced Acreage Alternative would develop a smaller area compared to the Proposed Project, fewer impacts would occur, such as impacts to existing trees and seasonal wetlands."[6]

d. The discussion of the Environmentally Superior Alternative at the end of Chapter 5 in the 2004 DEIR includes the following important observations (pages 5-32 through 5-33).
   i. The Reduced Acreage Alternative would result in fewer environmental impacts than the Proposed Project while still providing a mix of housing types consistent with the goals of the applicant.
   ii. In addition, the Reduced Acreage Alternative would not involve the placement of residences directly south of the decommissioned Davis Landfill. Therefore, impacts associated with the Davis landfill would be reduced should the Reduced Acreage Alternative be approved.
   iii. Biological impacts would also be reduced should the Reduced Acreage Alternative be approved, because seasonal wetland habitat located north of Channel "A" would not be developed.
   iv. Similarly, due to the decreased number of vehicle trips, which would be generated by the Reduced Acreage Alternative, traffic impacts would be expected to be less intense than with implementation of the Proposed Project. Utilizing trip generation information provided in the Traffic Impact Analysis prepared by Fehr & Peers for the Proposed Project, the Reduced Acreage Alternative would generate approximately 17,506 average daily trips (ADT), while the Proposed Project would generate approximately 27,627 ADT." [This would be a reduction of 10,121 ADT, or 36.66 percent.]

e. Recent Agency Communications to the City of Davis Regarding the Former Landfill: Concerns about potential contamination associated with the former Davis Landfill remain and valid, as reflected in the NOP comment letter submitted by the Yolo County Environmental Health Division on 8 December 2023, which appears in appendix F of the DEIR. That letter specifically cited concerns about landfill gas migration. A separate letter on the same date from the Yolo County Department of Community Services cited potential problems associated with respect to groundwater. Finally, a letter from the Central Valley Regional Water Quality Control Board on 26 July 2023 expressed similar concerns and requested that the closed water supply well for the closed sewage treatment plant near the proposed project site be sampled for polyfluoroalkyl substances (PFAS).

[6] Covell Village DEIR, December 2004, page 5-13.

LETTER 98: GREG ROWE (LETTER 3 OF 7, 02/12/25)

Response to Comment 98-1
Please see Master Response 2.

Response to Comment 98-2
Please see Master Response 2.

Response to Comment 98-3
Please see Master Response 2.

Response to Comment 98-4
Please see Master Response 2.

Response to Comment 98-5
Please see Master Response 2. As discussed therein, contrary to the commenter's assertion, the Reduced Acreage Alternative included in the Covell Village Draft EIR did not avoid the on-site alkali playa and alkali wetlands, and thus, it does not meaningfully take into account the on-site wetlands. Rather, it only focused on avoiding the seasonal wetland north of Channel A, which is a much smaller aquatic feature. This comment also mentions the reduction in traffic trips that would result from the Reduced Acreage Alternative in the Covell Village Draft EIR. As noted in Master Response 2, the Agricultural Resource Preservation Alternative, a form of a reduced acreage alternative, would similarly reduce traffic trips due to the elimination of 470 units.

Response to Comment 98-6
Please see Master Response 3.

Letter 99

MEMO

TO: Dara Dungworth, Principal Planner
FROM: Greg Rowe, Planning Commissioner
DATE: 20 February 2025
SUBJECT: Comments on Construction Phase Air Quality Analysis – Village Farms DEIR

This memo comments on the analysis of Construction Emissions for the Proposed Project and the BRPA, contained in Chapter 4.3[1] of the Draft Environmental Impact Report, specifically pages 4.3-47 through page 4.3-52. The chapter emphasizes that most of the significant earth movement would occur during Phase 1 of the project[2], related to grading and site preparation, including installation of backbone infrastructure (water, sewer and storm-drain infrastructure), plus moving soil from the Urban Agricultural Transition Area (UATA) to the proposed development area.[3]

I am concerned that this section of Chapter 4.3 provides no information on what assumptions were made in performing the projected emission calculations. Neither this chapter nor Appendix C provide this information.[4] Without these details, the reader doesn't how the emissions were calculated, whether all relevant factors were taken into consideration, and whether the information presented is indeed accurate and reliable. It's a matter of "showing your work," and this DEIR fails to do that.

99-1

1. **Proposed Project and BRPA Assumptions**: The assumptions listed on page 4.3-9 include:
    a. Approximately 11,261.3 cubic yards (CY) of grading material would be exported off-site;
    b. The number of anticipated pieces of construction equipment was increased during the grading phase to account for the amount of on-site material movement from the UATA to the proposed development area, estimated to be approximately 1,000,000 CY.

2. **Magnitude of Material Movement:** The DEIR provides no information on the types of construction equipment that would be used for earth movement and transport. This information must be provided in the Final EIR. To gain a better understanding of how much material will be moved, it is helpful to relate cubic yards to the capacity of a standard dump truck, which can carry between ten and 16 CY of dirt.[5] The number of truck loads needed for the Project would be as follows:
    a. Exporting 11,261 CY off-site:
        i. 10 CY capacity trucks: 1,126 truck loads.
        ii. 16 CY capacity trucks: 704 truck loads.
    b. Moving 1 million CY:
        i. 10 CY capacity trucks: 100,000 truck loads
        ii. 16 CY capacity trucks: 62,500 truck loads

99-2

[1] The Chapter is titled Air Quality, Greenhouse Gases, and Energy.
[2] Page 4.3-48.
[3] Page 4.3-49.
[4] AA.GHG Modeling Results
[5] Source: Dustin Hawley. J.D. Power, 4 February 2021.

3. Questions That the EIR Must Address About Material To Be Exported Off-Site

a. What is the location of the intended deposit site (or sites if more than one site is to be used)? **99-3**
   i. How many miles is the deposit site (or sites) from the Project?
   ii. Will the material to be exported be tested prior to export for potential soil contaminants related to operation of the former Davis landfill?

b. What is the assumed volume capacity of the trucks that would be used for the export activity? Will it be 10 CY, 16 CY or something else? **99-4**

c. How many round-trip miles will be driven by the trucks carrying the exported material? **99-5**

d. Although unrelated to air quality, will the applicant be responsible for repairing any public roadway damage resulting from travel by up to 1,126 dump truck round trips? **99-6**

e. **COMMENT:** The DEIR should provide information about the material movement activity in a manner that can be easily understood by the casual reader of the DEIR. For example, a speaker at the public hearing on 12 February 2025 said that 1,000,000 CY of dirt could fill a certain number of typical Super Bowl stadiums (I forget the number he mentioned but it was very large). Providing this information would give the reader a better understanding of the magnitude of earth movement necessary to carry out the project as proposed. **99-7**

4. Questions That the EIR Must Address About Material Movement From the UATA to the Proposed Development Area: **99-8**

a. What types of equipment will be used in addition to dump trucks?

b. What is the anticipated number of trips the equipment (dump trucks, earth movers, etc.) will make between the UATA and the proposed development area? **99-9**

c. How many cumulative miles will be traveled by this equipment in the course of moving 1 million cubic yards of material? **99-10**

d. How many hours per day will the equipment operate? **99-11**

5. Questions About Table 4.3-9 – Maximum Unmitigated Construction-Related Emissions – Phase 1 **99-12**

a. Why are only three pollutants listed (ROG, Nox and PM-10?).

b. Why does the table not include other components of construction exhaust, particularly diesel fine particulates (DPM); i.e., diesel exhaust particulates having a diameter of 2.5 microns or less)? **99-13**

6. **Missing Activity – Grade Separated Crossings:** In order to provide a complete air quality analysis, the DEIR should include information about the amount of material that would need to be excavated, moved and then replaced for construction of the grade-separated pedestrian and bicycle crossing of Pole Line Road near its intersection with Moore Avenue. It also must include similar information for the grade-separated crossing of F Street and the railroad tracks. As I have pointed out in previous comments on the Village Farms project, the City should not allow this project to move forward without provisions in the Baseline Features for these grade-separated crossings to be completed and operational before Phase 2 of the project is completed. **99-14**

In the absence of the information requested in this memo, I contend that Chapter 4.3 is inadequate and incomplete. **99-15**

LETTER 99: GREG ROWE GREG ROWE (LETTER 4 OF 7, 02/20/25)

Response to Comment 99-1

Page 4.3-47 through page 4.3-52 of the Draft EIR provide a sufficient description of the methodology and assumptions used for the Proposed Project's and BRPA's construction-related air quality and GHG impact analysis. Specifically, the Draft EIR includes a list of development that would occur as part of Phase 1 construction, as well as the project-specific data that was input into the modeling. Appendix C of the Draft EIR includes the technical results of the modeling conducted for Phase 1 of the Proposed Project and the BRPA. The reports included in Appendix C present a summary of emissions associated with the Proposed Project/BRPA, as well as details regarding the project-specific information, and the default data, that was assumed in the modeling to calculate such emissions. Section 8 of the CalEEMod reports includes a summary of the "User Changes to Default Data" which provides a description of the project-specific data that was updated in the modeling, and the justification as to why the default data was updated. The approach of putting most of the technical details regarding modeling assumptions and outputs in an Appendix is consistent with CEQA Guidelines Section 15147, Technical Detail:

> The information contained in an EIR shall include summarized technical data, maps, plot plans, diagrams, and similar relevant information sufficient to permit full assessment of significant environmental impacts by reviewing agencies and members of the public. Placement of highly technical and specialized analysis and data in the body of an EIR should be avoided through inclusion of supporting information and analyses as appendices to the main body of the EIR. Appendices to the EIR may be prepared in volumes separate from the basic EIR document, but shall be readily available for public examination and shall be submitted to all clearinghouses which assist in public review.

Response to Comment 99-2

The hauling trip assumptions included within the construction modeling prepared for the Proposed Project/BRPA are presented in Section 5.3.1 of the CalEEMod results report (see Appendix C to the Draft EIR). As shown therein, a total of 8.8 one-way hauling trips per day were anticipated to occur along the off-site street network during grading activities associated with Phase 1 of the Proposed Project/BRPA. CalEEMod assumes a haul truck capacity of 16 cubic yards (CY) per truck, with half of the one-way truck trips (4.4 trips) assumed to be hauling soil, and the other half of the truck trips assumed to be associated with empty trucks returning to the site. The grading phase was anticipated to occur over 160 days (i.e., eight months), based on project-specific information provided by Cunningham Engineering (see Section 5.1 of the CalEEMod results report). Accordingly, the modeling assumed a total of 1,408 hauling trips would occur along the surrounding street network during the grading phase associated with the 11,261 CY of soils that would be exported from the site during the grading phase.

Additionally, the off-road equipment anticipated to be used during construction of the Proposed Project/BRPA is presented in Section 5.2.1 of the CalEEMod Results Report (Appendix C to the Draft EIR). As shown therein, the modeling assumed that a total of one grader, three excavators, two tractors/loaders/backhoes, two scrapers, two rubber tired dozers, and two dumpers/tenders would be used on-site during grading activities. The construction equipment was assumed to operate on-site for eight hours a day over the eight-month grading phase. According to

Cunningham Engineering,[9] two scrapers operating for eight hours per day over eight months would result in about 3,200 hours of operation. A typical scraper moves approximately 72 CY per cycle and estimating six cycles per hour (10 minutes per cycle), the two scrapers would be able to move approximately 1.4 million CY of soil on-site. As such, the two scrapers would provide the major on-site earth movement from the Northern Agricultural Area to the proposed development area, with the additional equipment to be used in support of the earth moving activities and for finishing the rough grading at the site.

Response to Comment 99-3

The actual receiving location of the soils anticipated to be exported off-site is currently unknown. This level of specificity is not typical in EIRs and CEQA only requires a reasonable estimate. The CalEEMod modeling assumes each one-way hauling trip would be 20 miles, which is a reasonable, conservative assumption.

With regard to soil testing, the on-site soil sampling results do not support the need for testing on-site soils before off-haul, with the exception of the limited area around the existing on-site former barn/shed area, where toxaphene was identified. Please see Master Response 3 for further discussion of toxaphene and the related mitigation measure requirements in the Draft EIR.

Response to Comment 99-4

Please see Response to Comment 99-2.

Response to Comment 99-5

As discussed in Response to Comment 99-3, the CalEEMod modeling assumes each one-way hauling trip would be 20 miles. Thus, each hauling truck would drive a total of 40 miles round-trip.

Response to Comment 99-6

Phase 1 construction would include a total of approximately nine one-way haul trips per day over a total of 160 days. The 1,408 total hauling trips that would occur during Phase 1 construction (the most intensive phase) would represent a relatively minor temporary increase in truck traffic travelling along local roadways, particularly when considering the regular use of Pole Line Road by heavy trucks transporting solid waste to the Yolo County Central Landfill, located approximately 2.5 miles northeast of the project site/BRPA site.

Response to Comment 99-7

Super Bowl stadiums are not an accurate unit of measurement. The industry standard unit of measurement for soil is CYs, which is the unit of measurement used within the Draft EIR and the modeling prepared for the Proposed Project. Thus, the Draft EIR is adequate.

Response to Comment 99-8

Please see Response to Comment 99-2.

[9] Brian Foster, Associate Principal/Engineering Department Manager, Cunningham Engineering Corporation. Personal communication [email] with Rod Stinson, Vice President, Raney Planning & Management, Inc. November 12, 2024.

Response to Comment 99-9

On-site movement of soils using off-road equipment is not measured in number or length of trips, but rather in cycles and hours of operation. For further detail, please see Response to Comment 99-2.

Response to Comment 99-10

Please see Response to Comment 99-9.

Response to Comment 99-11

Please see Response to Comment 99-2.

Response to Comment 99-12

As described within Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy, of the Draft EIR, YSAQMD has established significance thresholds specifically for emissions of ROG, NO_X, and PM_{10} within their Handbook for Assessing and Mitigating Air Quality Impacts. Thus, the analysis included in the Draft EIR was based on a comparison of the Proposed Project's/BRPA's emissions to the YSAQMD-established pollutant thresholds for ROG, NO_X, and PM_{10}.

Response to Comment 99-13

$PM_{2.5}$ is a subset of PM_{10}. Thus, emissions of $PM_{2.5}$ are captured within the emissions of PM_{10} presented in the Draft EIR. In addition, as discussed above, the YSAQMD has established significance thresholds specifically for emissions of ROG, NO_X, and PM_{10} within their Handbook for Assessing and Mitigating Air Quality Impacts. The YSAQMD does not currently have an adopted $PM_{2.5}$ threshold of significance. Nonetheless, $PM_{2.5}$ emissions are presented in the CalEEMod results report included as Appendix C to the Draft EIR for informational purposes.

Response to Comment 99-14

As described on page 4.3-47 and 4.3-48 of the Draft EIR, in order to provide a more realistic evaluation of potential impacts associated with project construction, while also remaining conservative, the modeling conducted for construction of both the Proposed Project and the BRPA is for the most intensive construction phase, which would be Phase 1. As discussed in Master Response 6, and further presented in Chapter 3 of this Final EIR, since release of the Draft EIR, the construction emissions analyses for the BRPA have been updated to reflect overlapping construction of Phase 1 and the Pole Line Road undercrossing, in light of ongoing Development Agreement negotiations.

Response to Comment 99-15

Please see Responses to Comments 99-1 through 99-14. As detailed therein, the analyses and conclusions of Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy, of the Draft EIR are adequate.

MEMO

TO: Dara Dungworth, Principal Planner – City of Davis
FROM: Greg Rowe, Planning Commissioner
SUBJECT: Additional Comments – Village Farms Draft Environmental Impact Report (DEIR)
DATE: February 20, 2025 (REVISED)

This memo conveys additional comments, questions and suggestions on numerous aspects of the Draft Environmental Impact Report (DEIR) for the proposed Village Farms project ("Project"). Many of the comments refer to the DEIR published in December 2004 for the previously proposed Covell Village project[1] (2004 DEIR) on the same site, because I have found that document to be informative and illuminating relative to the January 2025 DEIR for the currently proposed Project. As discussed in this memo, the December 2004 DEIR for the Covell Village Project identified substantive transportation mitigation measures compared to the weak transportation measures mentioned in the January 2025 Covell Farms DEIR.

100-1

Summary of 2004 Covell Village Project: The proposed Covell Village project would have encompassed 422 acres with 1515 dwelling units, of which 1078 would have been single family homes (59%). The project also included a fire station, a 10-acre school site for 600 students[2], a 1-acre pre-school, a 5-acre senior care facility, 113.7 acres of open space[3], and a 15.8-acre "Covell Village Center" with live-work units at the northwest corner of the intersection of East Covell Boulevard and Pole Line Road (southeast portion of the site; 2004 DEIR Figure 3-4).[4] The project was expected to generate 20,479 daily vehicle trips (2004 DEIR, page 4.4-26)[5]

Residential uses would have comprised slightly more than 232 acres (2004 DEIR, Table 3-1, page 3-5). The 2004 Project would have been served by a new Unitrans bus route that would have turned around at an internal roundabout, and would have been subsidized by the project applicant for about seven years through implementation of a Covell Village Transportation Assessment District.[6]

a) The 2004 DEIR considered 13 project alternatives, including:

[1] *Covell Village Draft Program Environmental Impact Report,* SCH 2004062089. Prepared for the City of Davis. Raney Planning & Management, Inc. December 2004.
[2] 2004 DEIR, page 3-10.
[3] 2004 DEIR, page 3-5.
[4] The 15-8-acre Village Center would have consisted of retail, offices, live/work, a church, health club, day care, hotel, restaurant, and gas station/market, along with 60 apartments, and vehicle parking. See 2004 DEIR, pages3.5 and 3-8.
[5] It must be noted that as explained in the January 2025 DEIR for the proposed Village Farms project, newer and more accurate transportation models predict 13,885 new weekday daily trips for the Village Farms project, and 15,415 for the BRPA (2025 Village Farms DEIR, page 4.13-24).
[6] 2004 DEIR, pages 3-15 and 4.4-64.

- High Density Alternative (2004 DEIR, page 2-10). It assumed 1990 units, or 31.35% more than the proposed project, with an increase of 1100 residents.[7] (In contrast, the "Higher Number of Units – Same Footprint" alternative examined in the January 2025 Village Farms DEIR has 50% more units than the proposed Project.) The 2004 High Density Alternative would have generated 25,733 new daily vehicle trips (5250 more than the proposed project, an increase of 25.63%).[8]
- Reduced Acreage Alternative, which would build the same 1515 housing units on the portion of the project site south of Channel A (on 147 acres). The northern portion of the proposed site would not have been included in the project.[9] This alternative was selected as the Environmentally Superior Alternative (2004 DEIR, pages 5-32 and 5-33). Attributes of the Reduced Acreage Alternative included fewer impacts related to the former Davis Landfill and to biological resources (2004 DEIR, pages 5-11 and 5-13).

100-1 Cont.

Supplemental Analysis and Comments on the January 2025 Village Farms DEIR

1. **Additional Transportation Impact Analysis Should Be Performed:** During the public hearing of 12 February 2025 on the Village Farms project, Raney Vice President Nick Pappani stated it had been estimated that 700 K-12 students would reside in the 1800 dwelling units (DUs) upon final buildout. Because the Environmentally Superior Alternative (ESA) cited in the January 2025 DEIR would encompass 50% more dwelling units, I asked Pappani whether it would be logical to assume there would potentially be an additional 350 students residing at the project if the ESA alternative were constructed (total of 1050 students), to which he responded affirmatively.

100-2

   a. **SUGGESTION:** The DEIR did not identify how many K-12 students could be expected to live at Village Farms upon completion of the project. The information provided by Pappani (i.e., 700 students for the project and 1050 students for the ESA) should be added to the text of the DEIR.

   b. The January 2025 Village Farms DEIR repeatedly states that the project applicant intends to accommodate the needs of pedestrians and bicycle riders by installing crosswalks, bike lanes, bike lane conflict markings, bike/ped crossing markings, bike intersection crossing markings, driver visual ques and other methods such as elimination of channelized right-turn lanes to reduce collisions between vehicles and people using active means of transport (i.e., biking, walking). It is articulated on multiple pages that grade separated

100-3

[7] 2004 DEIR, page 4.11-29.
[8] 2004 DEIR, page 4.4-39. However, it is stated on page 4.4-48 that the number of "Higher Density" daily trips would be 25,690, an immaterial difference of 83 daily trips.
[9] 2004 DEIR, pages 2-8 and 2-11).

pedestrian/bicycle (ped/bike) crossings may be provided if analyses shows construction of such infrastructure would be feasible.[10]

In contrast, the 2004 DEIR for the previously proposed Covell Village project at the same site did not equivocate on this issue, stating on a number of pages that "Grade-Separated crossings…would be constructed as part of the project…[11] (underlining added for emphasis) including at:

i. Pole Line Road, connecting to the Nugget Field site,
ii. Crossing F Street and railroad tracks, and
iii. A Pedestrian Underpass, "…which would connect the Village area with the existing Oak Tree Plaza…" accommodating bicycle and pedestrian traffic.[12] It would be open at a couplet island to break the crossing into two shorter tunnels.

100-3 Cont.

c. **COMMENT: Responsibility for Grade-Separated Crossings:** The recently released Village Farms DEIR also asserts that if grade-separated crossings are constructed, the cost would be shared with other nearby developments, including Palomino Place and the proposed Shriners project. This proposed cost-sharing arrangement should be rejected by the City of Davis for the following reasons:

i. The Palomino Place project has been approved and moving forward, but it should not be expected to contribute funds toward an infrastructure improvement tied to another unrelated project that has yet to be approved.
ii. The Shriners project may not be approved by the electorate, so it would be impossible at the time the governing documents[13] for the Village Farms project are prepared to make another as yet unapproved project responsible for future costs.
iii. The grade-separated ped/bike crossing of Covell Boulevard east of Monarch Lane, contemplated in the City's Major Projects Facilities Plan (described on page 3-11 of the 2004 DEIR), has been completed and in use. The bike undercrossing is essentially on the shared borders of the Palomino Place and Shriners projects, which will facilitate safe and efficient movement by pedestrians and bicycle riders. Moreover, it will enable safe access by K-12 students to the local schools, all of which are located south of East Covell Blvd. It is therefore completely unnecessary for both of those projects to partially fund grade-separated crossings that are not needed by their residents.

[10] 2025 Village Farms DEIR, fifth bullet on page 4.13-32.
[11] Such statements about grade separated ped/bike crossings can be found on these pages of the 2004 DEIR: 3-11, 3-14, 3-15, 4.4-67, Figure 3-6 on page 3-14, Figure 3-10 on page 3-21, and on page 4.4-67 under the heading "Pedestrian/Bicycle Facilities."
[12] 2004 DEIR, page 3-15.
[13] Ballot Baseline Features, Development Agreement, Conditions of Approval, etc.

iv. The Village Farms Applicant Must Be Required to Pay for Grade-Separated Crossings: The proposed Covell Farms project will be the sole generator of the trips taken by the 700 – 1050 K-12 students, so the project applicant should logically be required to pay the entire cost of the grade-separated crossings necessary to provide safe, non-motorized transportation for those young residents.

1. Responsibility for Grade-Separated Crossings Must Be a Measure D Baseline Feature: The project applicant's responsibility to pay for grade-separated bike/ped crossings must be included in the project's Baseline Features, and NOT in the Development Agreement (DA). Past experience has shown, particularly with respect to The Cannery project, that it is all too easy for applicants to convince City Council to relieve them of DA obligations after a project has been approved and under construction.

100-3 Cont.

d. **Request:** 700 K-12 students will need to reach elementary, junior high and senior high schools south of Covell Blvd/Mace Boulevard (or 1050 students in the Environmentally Superior Alternative). The proposed project, as currently envisioned, would require students to navigate two busy arterials using crosswalks and bike lanes, whereas grade-separated crossings would keep students isolated from vehicle traffic. Frequently occupied crosswalks on Covell Boulevard and Pole Line Road near the project area would undoubtedly cause traffic delays, especially during peak AM travel. VMT could even increase if drivers were to seek alternative routes in order to avoid traveling on streets with busy crosswalks.

100-4

It is easy to foresee that most parents would drive their children to school rather than expose them to the dangers inherent in traversing busy arterials in crosswalks or on bicycles. Therefore, a revised traffic analysis must be performed that will compare and contrast the potential impact on Vehicle Miles Traveled (VMT), Level of Service (LOS) and other transportation measures under the following two scenarios:

i. Grade-separated ped/bike crossings of Pole Line Road and F Street/Railroad tracks, which would allow students to travel to and from school by walking or biking; versus

ii. The absence of grade-separated ped/bike crossings as contemplated in the Village Farms project description, which would undoubtedly compel parents to drive their children to and from school because of understandable safety concerns (thereby increasing VMT and the number of daily trips).

100-5

2. **Transportation Mitigation Measures Cited for the 2004 Covell Village High Density Alternative Are Superior to the Mitigation Measures Identified in the Environmentally Superior Alternative for the January 2025 Village Farms DEIR:** Again, the high density alternative assessed in 2004

would have increased the number of dwelling units from 1515 to 1900, with a corresponding increase in new daily trips from 20,479 for the proposed project to 25,733 trips. Keep in mind that the 1990 dwelling units for the High Density Alternative is only 190 more units than the currently proposed Village Farms project (1800 units), but 710 dwelling units less than the 2700 units contemplated in the Environmentally Superior Alternative in the January 2025 Village Farms DEIR.

Mitigation measures cited as necessary for the High Density Alternative in the 2004 DEIR included:

a. Install a traffic signal at the Pole Line/Picasso Avenue intersection, paid for by the applicant (2004 DEIR, p. 4.4-49).

b. Widen Pole Line Road north of Covell Blvd. from two lanes to four lanes to the northern boundary of the project site, to be completed prior to occupancy of a commercial or residential unit (2004 DEIR, p. 4.4-52). Note that this mitigation requirement applied to BOTH the proposed project of 1515 dwelling units and to the 1990-unit High Density Alternative.

100-5 Cont.

c. Modify the Covell/Pole Line Intersection to include an additional eastbound left-turn pocket from Covell Blvd. onto northbound Pole Line Road, with the intersection modifications to be completed prior to initial occupancy of a commercial building or residential unit (2004 DEIR, page 4.4-59).

d. **COMMENT:** In contrast, the January 2025 DEIR for the proposed Village Farms project does not include any of the substantive mitigation measures summarized above for the project proposed in 2004. Instead, it identifies the following transportation mitigation measures (Village Farms DEIR page 4.13-32), which the DEIR admits would merely "...reduce the potential for conflicts between bicyclists or pedestrians that would otherwise be caused by the project...":

   i. Pole Line Road/Picasso Avenue – New west leg and traffic signal.
   ii. Pole Line Road/Donner Avenue – New west leg and traffic signal
   iii. Pole Line Road/Moore Boulevard – New west leg and roundabout.
   iv. Improve the East Covell Boulevard/Pole Line intersection with marked crosswalks and pedestrian crossing signals, eliminate channelized right-turn lanes, and install high visibility bike lane conflict markings (page 4.13-34).
   v. Construct a roundabout with ped and bike crossings at the Pole Line Road/Moore Boulevard intersection.

100-6

e. **COMMENT:** In addition, the January 2025 Village Farms DEIR concedes that "...active transportation network gaps would impede pedestrian and bicycle access to and from the site at several locations (page 4.13-32), and that "...design details regarding bicycle and pedestrian crossing amenities have not yet been determined" (page 4.13-33), and "The

adverse effects on pedestrian and bicycle safety would be inconsistent with City plans and policies that promote pedestrian and bicycle travel" (page 4.13-33).

f. **COMMENT:** The January 2025 DEIR likewise concedes that the "Higher Number of Units – Same Footprint Alternative (i.e., the 'Environmentally Superior Alternative') would increase "...the severity of impacts related to conflicts between vehicles and pedestrians/bicyclists...compared to what is anticipated to occur under the Proposed Project" (page 7-32).

100-6 Cont.

i. **COMMENT:** These admissions demonstrate that the Village Farms project is not yet ready for consideration by Davis voters, and reinforce the absolute necessity for the applicant to provide grade-separated pedestrian and bicycle crossings at Pole Line Road/Moore Avenue and at F Street north of Covell Boulevard. The ballot measure Baseline Features should specify that these facilities must be constructed and fully ready for use before completion of Phase 2 of the proposed Village Farms project, and that the cost of providing these facilities should be solely the responsibility of the project applicant.

3. **Relocate Park**: The Heritage Oak Park Proposed at the Southeast Corner of the Site Should be Moved and Replaced with High Density Housing.

100-7

a. As the 2004 DEIR explains, clustering the highest density housing near the intersection of Covell Blvd and Pole Line Road would reduce vehicle travel by the residents of those dwelling units (2004 DEIR, page 3-18 and Figure 3-4 on page 3-9). The park should be moved further into the interior of the proposed project.

LETTER 100: GREG ROWE (LETTER 5 OF 7, 02/20/25)

Response to Comment 100-1
Please see Master Response 1. In addition, between the preparation of the 2004 Covell Village Project EIR and the Village Farms Davis Project EIR, the law related to transportation analysis changed from LOS to VMT. Please see Master Response 5 for a more detailed explanation.

Response to Comment 100-2
Please see Response to Comment 97-46.

Response to Comment 100-3
Please see Master Response 6.

Response to Comment 100-4
Please see Master Response 5. As noted, LOS is no longer a metric used to analyze transportation impacts for CEQA.

Fehr & Peers is not aware of any research or data on the VMT benefits of grade-separated bicycle/pedestrian crossing projects. CAPCOA indicates that constructing or improving a Class I, II or IV bike facility that connects to a larger existing bikeway network can yield a 0.8 percent reduction in VMT.

Response to Comment 100-5
Please see Master Response 1. In addition, LOS is no longer a metric used to analyze transportation impacts for CEQA.

Response to Comment 100-6
Please see Master Response 6.

Response to Comment 100-7
The high-density housing proposed for Village Farms is located in areas designated as West Park South and West Park North, in the southwest corner of the project site, that are located immediately northeast of the intersection of East Covell Boulevard/F Street. The high-density housing units would be located within 0.5-mile of bus stops on East Covell Boulevard at F Street, served by the Unitrans P and Q Lines and Yolobus Route 43. The Unitrans L Line and T Line have two stops on Pole Line Road north of East Covell Boulevard, along the project frontage. The Unitrans E Line has a stop on J Street, south of the East Covell Boulevard/Cannery Avenue-J Street intersection. The Unitrans F Line runs along F Street, north of West 14th Street with the nearest stop at West Covell Boulevard. Relocating the high-density housing from the southwest corner of the site to the southeast corner of the site, near the intersection of East Covell Boulevard/Pole Line Road would move it closer to bus stops for the Unitrans L Line and T Line, but farther away from stops for the Unitrans E Line and F Line. It is not likely that this change would have a substantive effect on VMT generated by the Proposed Project.

Letter 101

Dara Dungworth

From: Greg Rowe <gregrowe50@comcast.net>
Sent: Friday, February 21, 2025 12:25 PM
To: Dara Dungworth
Cc: Michelle Weiss Old
Subject: Comments - Village Farms Drainage Study - Appendix K

Importance: High

Categories: VFD Comment

CAUTION: **External email. Please verify sender before opening attachments or clicking on links.**

Hi Dara,

I reviewed the Drainage System and Flood Control Analysis prepared by Cunningham Engineering for the proposed Village Farms project. There are several aspects of the report that are troubling, in particular several references to the fact that final plans will not be finalized until a later date. Examples:

101-1

- Page 12 includes a discussion of the "Depressed Agricultural Buffer," which will be excavated approximately 9 - 10 feet to a bottom elevation of 28 feet. The paragraph states that " Specific programming of plantings, low flow channels, and/or habitat island regions has not yet been established with the City staff. The project applicant will initiate discussions with the appropriate City Departments...", and that "...These detailed design activities for the ag buffer will be refined at the time of development of the improvement plans and subdivision maps." **COMMENT**: This is completely unacceptable. Because the Davis electorate will be asked to approve this project on the November 2025 ballot, these details about the "Depressed Ag Buffer" must be completely finalized and made known to the public before the proposed project election occurs.

101-2

- Page 12, under the same heading, it is also stated: "The appropriate support and maintenance for the naturalized area will be discussed with City Staff." **COMMENT:** This statement is too nebulous. When will such discussions occur? When will they be completed? Will the "appropriate and maintenance" measures be memorialized in a publicly available document? Who will bear final responsibility for approving the document?

101-3

- Page 12, Conclusion: It is reiterated that: "The design details presented within this report will continue to be finalized with the City Staff through the subdivision map and detailed improvement plans." **COMMENT**: Again, this provision falls short of what is needed for such a massive project. These details must be finalized before the project is presented to the voters.

101-4

Perhaps most important, the analysis that comprises Appendix K only examines the basic project proposal consisting of 1800 dwelling units. The Environmentally Superior Alternative (ESA) identified in the DEIR includes a 50% increase in the number of units (a total of 2700 dwellings). It is logical to assume that a project alternative that would increase the residential density by this magnitude will likewise increase the amount of impervious surface by a substantial degree of magnitude, if not in a directly proportional manner. Therefore, a separate drainage system and flood control analysis is warranted that incorporates the 2700 units. The DEIR must be revised to incorporate this separate analysis for the high

1

101-4 Cont.

density alternative that has been identified as the ESA. The environmental analysis in the DEIR will be insufficient if such an analysis is not performed.

Thank you for considering these comments.

Regards,

Greg Rowe
City of Davis Planning Commissioner
Comment Submitted 21 February 2025

LETTER 101: GREG ROWE (LETTER 6 OF 7, 02/21/25)

Response to Comment 101-1
Please see Master Response 1.

Response to Comment 101-2
Please see Master Response 1.

Response to Comment 101-3
Please see Master Response 1.

Response to Comment 101-4
The Higher Number of Units – Same Footprint Alternative is not evaluated at a level equal to that of the Proposed Project, nor is there a requirement under CEQA to do so. As such, a separate drainage and flood control analysis, comparable to the Proposed Project, is not required.

MEMO

TO: Dara Dungworth, Principal Planner – City of Davis
FROM: Greg Rowe, Planning Commissioner
DATE: 23 February 2025
SUBJECT: Village Farms DEIR Comments - Information Needed for Construction Analysis

102-1

This memo provides comments and recommendations for improving the project description and related environmental analysis in the Draft Environmental Impact Report for the proposed Village Farms project (Project). In particular, the DEIR lacks a detailed description of how more than 11,261 cubic yards (CY) of material would be exported off-site during grading, and more important, how over one million (CY) of material would be moved from the Urban Agricultural Transition Area (UATA) to the proposed development area under both the Project and Biological Resource Preservation Area (BRPA) scenarios. I have previously commented on the air quality aspects of the construction phase of the Project and BRPA, whereas this memo addresses related shortcomings of the project description as it relates to the most intense phase of construction.

102-2

The methodology of excavation, the transport of soil and other material, and the raising of the base elevation of the development area must be described in detail in order to facilitate a robust environmental review.

The DEIR states on pages 4.3-48 and 49 the most intensive construction work would occur during Phase 1 for both the Project and the BRPA. This work would include relocation and expansion of Channel A and the detention basin, in addition to mass grading of the development area and installation of backbone infrastructure.

102-3

Background

During a 13-year period (2002-2015, I worked as Senior Environmental Analyst for the Sacramento County Department of Airports, which operates four airports[1]. Among my key duties was development of detailed construction information to enable preparation of robust environmental documents pursuant to the California Environmental Quality Act.[2] Virtually all airport improvement projects entail excavation, movement, transport and temporary storage of soil and other material. Therefore, the project description for every project included exhibits and detailed narratives for the following aspects of construction:

- Haul routes
- Laydown areas
- Soil deposition and storage areas
- Equipment and construction worker parking

[1] Sacramento International Airport, Mather Airport, Executive Airport and Franklin Field.
[2] These documents included Categorical Exemptions, Negative Declarations, Mitigated Negative Declarations, and Environmental Impact Reports (EIRs).

Letter 102 Cont.

102-3 Cont.

The provision of this information was vitally important, particularly so an accurate and detailed analysis could be performed to address the project's potential impact on hydrology, air quality, vegetation, species classified as threatened or engendered under the federal and California Endangered Species Acts, and other important impact subjects. Our guiding principle in developing construction methodology information for each project was: "It's not what you build that matters; it's the means and methods by which you build the project."

Information Needed for Robust Project and BRPA EIR

The DEIR for the proposed Project and BRPA does not adhere to this guiding principle. That is not necessarily the fault of the EIR preparers, who can only analyze the information which has been provided to them. Missing information that should be an integral part of the project description, and therefore subject to the environmental evaluation, includes but is not limited to the following:

102-4

- How will material be transported south from the UATA to the development area?
  - Will a temporary bridge be constructed over Channel A? If so, will the bridge remain in place after completion of construction?
  - Or, will construction equipment (dump trucks, excavators, etc.) alternatively move the material eastward to Pole Line Road, then south on Pole Line Road to re-enter the project area?

102-5

- Equipment laydown area(s)
- Soil deposition areas
- Haul routes

102-6

- Destinations of the exported material, and the methods by which the material will be deposited at that destination site or sites.

102-7

This information must be provided by the applicant to the environmental consultant so that it can be analyzed for the EIR. Absent this detailed construction information, the environmental analysis will be neither adequate or complete.

/Users/gregrowe/Documents/Planning Commission/Village Farms/EIR/DEIR Chapters/Comments_DEIR/Construction Memo(1)23 Feb 2025.docx

LETTER 102: GREG ROWE (LETTER 7 OF 7, 02/23/25)

Response to Comment 102-1
Please see the responses to Letter 99.

Response to Comment 102-2
Please see the responses to Letter 99.

Response to Comment 102-3
Please see the responses to Letter 99.

Response to Comment 102-4
Grading activities would be restricted to the project area and would avoid the public roadways. Earthwork moving activities transporting the fill materials from the Northern Agricultural Area to the urban development sites would be accomplished on-site without using County or City roads for access. Grading activities associated with the project include modifications to Channel A in the eastern portion of the project. The haul road for fill materials is anticipated to route through the areas proposed for disturbance in this eastern area and/or would implement temporary bridging across the drainage channel, as required by the contractor for the haul route.

Response to Comment 102-5
Identifying construction equipment lay down and deposition areas on the project site/BRPA site is not required. First, the EIR appropriately includes a programmatic analysis of the Proposed Project due to the program-level entitlements being requested at this time. As noted in Practice Under the California Environmental Quality Act:[10]

> Sometimes one aspect of a large project is clearly defined, but later phases are not sufficiently well defined to be analyzed in detail. In such situations, agencies often prepare an EIR that evaluates the entire project at a "program level" and the more clearly defined aspects of the project at a "project level" of detail. See Santa Teresa Citizen Action Group v City of San Jose (20023) 114 CA4th 689, 696.

The level of specificity required in an EIR is related to the discretionary entitlements being sought by the project applicant. In other words, the level of specificity required in an EIR generally depends on the degree of specificity involved in the proposed activity reviewed in the EIR. There is no requirement for EIRs only to evaluate detailed projects. The currently requested entitlements for the Proposed Project are noted on page 3-45 of Chapter 3 of the Draft EIR, as follows:

1. SOI Amendment. Because the 114.88-acre portion of the BRPA site is outside the City's SOI, the BRPA would require an SOI Amendment to include that portion of APN 042-110-029 within the City's SOI.
2. Annexation. The BRPA would require the annexation of the 497.6-acre BRPA site into the City of Davis.
3. General Plan Amendment. The BRPA would require a General Plan Amendment to redesignate the 497.6-acre BRPA site from Yolo County General Plan land use designations of S-P (382.72 acres) and Agricultural (114.88 acres) to the following City of Davis land use designations:

[10] Stephen L. Kostka and Michael H. Zischke. *Practice Under the Environmental Quality Act, Second Edition* (Vol. 1). Oakland: Continuing Education of the Bar (March 2024 Update), Section 11.31.

- 61.4 acres of RLD;
- 135.9 acres of RMD;
- 12.2 acres of RHD;
- 29.1 acres of P-SP
- 2.9 acres of Neighborhood Mixed-Use;
- 27.1 acres of Park/Recreation;
- 40.8 acres of Neighborhood Greenbelt;
- 47.1 acres of Natural Habitat Area; and
- 118.4 acres of UATA.[11]

4. Pre-zoning. The BRPA would require Pre-zoning of the BRPA site from the Yolo County zoning designations of S-P (382.72 acres) and Agricultural (114.88 acres) to the City of Davis zoning of P-D.
5. Development Agreement.

The Proposed Project and the BRPA cannot proceed with construction should the above-listed entitlements be approved by the Davis City Council and ultimately the voters. For that to occur, the project applicant would need to receive approval of additional discretionary entitlements from the City of Davis, thereby enabling on-site construction. These entitlements would include, at a minimum, City of Davis approval of a final PD and Tentative Subdivision Map(s). At such time that tentative map and final PD applications be submitted to the City of Davis, design-level detail will be available for subsequent City review for a determination as to whether the Proposed Project details are within the scope of activities evaluated within the program EIR, pursuant to CEQA Guidelines Section 15168.

Response to Comment 102-6

Please see Response to Comment 99-3.

Response to Comment 102-7

The comment is conclusory. Please see the previous responses to comments.

[11] Note that this has been revised to 11.3 acres of UATA and 107.1 acres of Agricultural as reflected in Appendix E to this Final EIR.

Letter 103

Dara Dungworth

From: Heather Schrader <hschrader@hsvma.org>
Sent: Monday, February 10, 2025 5:43 PM
To: Planning Commission
Subject: Village Farms project

Categories: VFD Comment

CAUTION: **External email. Please verify sender before opening attachments or clicking on links.**

To the Davis Planning Commission,

103-1 As a homeowner in the La Buena Vida condos, I am extremely concerned about the impact of the Village Farms construction proposal. Our insurance rates at La Buena Vida have skyrocketed the past several years and building on a flood plain right across Pole Line/County Road 102 is a terrible and, frankly, insane idea. Without the flood plain to protect our area from heavy rains (climate change is definitely causing this already) our property will be in jeopardy and the city of Davis will not be able to rely on State funds to help. This project will seemingly protect people who live in the proposed area by raising the land level, but this will place current homeowners surrounding the land at high risk of losing their homes. If approved, Davis would be guilty of giving in to developers in order to attract high income homeowners at the expenses of long time Davis residents in one of the very few affordable housing opportunities left in the city.

103-2 There are numerous other reasons not to allow this development such as toxic runoff from the previous Davis landfill, traffic concerns, etc. but the city should first and foremost be protecting its current residents and itself from the dangers of flooding and climate change.

Please DO NOT allow the Village Farms proposal to move forward!

Thank you,

Heather Schrader

Heather Schrader, RVT, MCJ
she/hers (What is this?)
Program Manager, Student Outreach
hschrader@hsvma.org
t 530.759.8106
hsvma.org

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LETTER 103: HEATHER SCHRADER (LETTER 1 OF 2, 02/10/25)

Response to Comment 103-1

Please see Master Response 1 related to financial concerns and Master Response 4 related to flooding concerns.

Response to Comment 103-2

Please see Master Responses 3, 4, and 5.

Letter 104

Dara Dungworth

From: Heather Schrader <heather.schrader@att.net>
Sent: Monday, February 24, 2025 10:05 AM
To: Dara Dungworth
Subject: DEIR comment for proposed Village Farms development

Categories: VFD Comment

CAUTION: **External email. Please verify sender before opening attachments or clicking on links.**

Dara Dungworth and the City of Davis Planning Commission,

104-1

As a homeowner in the La Buena Vida condos, I am extremely concerned about the impact of the Village Farms construction proposal. Our insurance rates at La Buena Vida have skyrocketed the past several years and building on a flood plain right across Pole Line/County Road 102 is a terrible and, frankly, insane idea. Without the flood plain to protect our area from heavy rains (climate change is definitely causing atmospheric rivers already) our property will be in jeopardy and the city of Davis will not be able to rely on State funds to help. This project will seemingly protect people who live in the proposed development area by raising the land level, but this will place current homeowners surrounding the proposed development at high risk of losing their homes. If approved, Davis would be guilty of giving in to developers in order to attract high income homeowners at the expenses of long time Davis residents in one of the very few affordable housing opportunities left in the city.

104-2

There are numerous other reasons not to allow this development as proposed such as toxic runoff from the previous Davis landfill, traffic concerns, etc. but the city should first and foremost be protecting its current residents and itself from the dangers of flooding and climate change.

Please DO NOT allow the current Village Farms proposal to move forward!

Thank you,
Heather Schrader
2719 Bidwell St. #4
Davis, CA 95618
916-747-5912

LETTER 104: HEATHER SCHRADER (LETTER 2 OF 2, 02/24/25)

Response to Comment 104-1
Please see Response to Comment 103-1.

Response to Comment 104-2
Please see Response to Comment 103-2.

Letter 105

Dara Dungworth

From: tinkymoto@aol.com
Sent: Tuesday, February 25, 2025 11:20 AM
To: Dara Dungworth
Subject: COMMENTS ON THE DRAFT EIR OF THE PROPOSED VILLAGE FARMS PROJECT

Categories: VFD Comment

CAUTION: **External email. Please verify sender before opening attachments or clicking on links.**

To the City of Davis,

I have multiple concerns about the Draft EIR for the proposed Village Farms project. Below is a list of some of the Draft EIR deficiencies. But first permit me to note:

My perspective is one of a longtime Davis resident who raised his family here, as well as one of a physician who has been involved with the continually evolving health and environmental concerns of the population.

Working over two decades on a bustling Labor and Delivery Service, I appreciate many of the specific medical, well-being, environmental, and social concerns of families, as new family members enter this World. On the other end of Life's Path, I unfortunately witnessed people of all ages depart from this World, as I spent five years helping establish and personally staff a Level II Trauma Center. From the experience gained on a Trauma Service, it became evident how many deaths and disastrous injuries could have been avoided.

105-1 Now to my concerns with the Draft EIR:

(1) FLOOD PLAIN

Approximately half of the land to be developed at the location of the proposed Village Farms project is in a FEMA Zone A Special Flood Hazard Area. CEQA's "rule of reason" dictates that there should be consideration of at least one Alternative Project on the proposed development location that is situated outside this flood plain. The DEIR is deficient in that NONE of the Alternative Projects at this location are outside the Flood Plain.

Concerning the "rule of reason", the State of California's voice is loud and clear that the State will no longer financially help cities who make the bad planning decision to build on huge flood plains like this project has. In case of flooding on the proposed Village Farms location, the City of Davis will face the financial fallout which will then be transferred to Davis residents.

(2) ABANDONED LANDFILL AND SEWAGE TREATMENT PLANT

105-2 The Old Davis Landfill burned unsorted garbage for many years. It was unlined and without a leachate collection system. For the sake of human safety (and other reasons), the proposed Village Farms project should have a minimum of a 1,000 foot buffer zone from the Old Landfill. The DEIR fails to adequately

105-2 Cont.

address this preventative human safety measure. It also fails to consider any alternative project on the proposed Village Farms location that is at least 1000 feet from the Old Landfill. Having an exclusionary area around such an abandoned landfill should not even be an issue for debate.

(3) UNACCEPTABLY HIGH LEVELS OF MULTIPLE SOIL TOXICS GENERATED RISKS

105-3

Arsenic levels more than 50 times higher than the normal ground level are found in the proposed 118 acre UATA "dig pit." One estimate is that the proposed Village Farms project will require that 100,000 truck loads of arsenic laden soil be removed from the UATA. A crater will remain. Certainly arsenic will be aerosolized from this massive geologic disruption. The DEIR fails to adequately address the generated health risks to those on the proposed Village Farms location and to those in the surrounding neighborhoods where some of the arsenic will be transported by air flow.

Toxaphene levels of 1.2 million mg/kg and lead levels up to 93 mg/kg (both exceeding DTSC levels) have been found in the proposed Heritage Oak Park. The DEIR fails to clearly identify the resultant health risks to those who recreate in the Park.

PFAS "forever chemicals" and manganese exceeding maximum concentration levels have been discovered in the groundwater under the location of the proposed Village Farms project. With the inevitable changes in the level of the Village Farms water table, massive digging, and possible mixing with runoff water and potential flooding, I do not see any discussion in the DEIR where the contaminated water might be headed and the consequential health and environmental risks.

(4) AIR POLLUTION AND GREENHOUSE GASES

With access to the west blocked by railroad tracks and access to the north blocked by the Old Davis Landfill and Sewage Plant, the proposed Village Farms project is left with access only on Pole Line Rd and Covell Blvd. Of this south and east border, Pole Line Rd constitutes 71% of the boundary and Covell Blvd 29%.

105-4

Hence, the intersection of Pole Line Rd and Covell Blvd will remain ground zero for the generation of air pollution and greenhouse gases. With the proposed Village Farms project, the generation of air pollution and greenhouse gases will certainly intensify, as well as the consequent human health and environmental risks. I fail to see in the DEIR a clear projection of the increased health risks which will certainly burden the residents in this area. The DEIR says nothing about the risks to kids playing at the proposed Heritage Oak Park which is located at this intersection.

I can find no indication in the DEIR concerning any guarantee by the City of Davis to upgrade its Third World public transportation system to lessen the increased health risks generated by proposed Village Farms project in the proximity of Pole Line Rd and Covell Blvd.

(5) LACK OF A REDUCED FOOTPRINT ALTERNATIVE

105-5

A glaring deficiency in the DEIR is the lack of a Reduced Footprint Alternative. In the NOP Comments found in Appendix B of the DEIR is a letter (dated December 8, 2023) from the County of Yolo Department

of Community Services (which includes Planning, Building, and Public Works) to the City of Davis that states, " The Draft EIR should consider a reduced footprint alternative that defines the northern project boundary south of the existing Davis Drain." (Note that the Davis Drain is also known as Channel A.)

At midnight on December 12, 2023 began the sole public meeting heard by the Davis City Council to discuss alternatives to the proposed Village Farms project. In person, I and other citizens suggested a Reduced Footprint Alternative. The footprint would be entirely south of Channel A and avoid the Flood Plain. It would provide up to 900-1000 units. The City Council responded with silence and promptly moved on.

105-5 Cont.

This proposed Reduced Footprint Project would be over 1000 feet from the Old Davis Landfill where garbage was burned for years. The Old Landfill was unlined without a leachate collection system.

Avoiding the Flood Plain, the Reduced Footprint Plan would obviate the need to dig out a 100+ acre crater next to the Old Landfill.

Being located south of Channel A means that hundreds of trees, plants, and critters that call Channel A home are left in peace.

Reducing the number of units from 1800 to up to 900-1000 would be beneficial to the health of the tens of thousands of us who daily pass through the intersection of Pole Line Rd and Covell Blvd or reside in adjacent neighborhoods.

Recall that CEQA [15126.6(a)] requires that an EIR include a discussion of reasonable project alternatives that would "feasibly attain most of the basic objectives of the project, but would avoid or lessen any significant effects of the project..."

Possibly, not considering a Reduced Footprint Alternative could be an invitation for lengthy and costly litigation.

(6) SAFETY OF PEDESTRIANS AND BiCYCLISTS

105-6

The DEIR fails to establish the feasibility of either an undercrossing or overcrossing for the proposed Village Farms project on Pole Line Rd. Nor does it establish the feasibility of such infrastructure on Covell Blvd.

Pedestrians and bicyclists coming and going from the proposed 1800 unit Village Farms project will need to resort to crosswalk usage. The increased traffic on Pole Line Rd and Covell Blvd will assure an increased risk to pedestrians and bicyclists. I do not see in the DEIR any indication of the projected number of resultant increased injuries.

105-7

The DEIR fails to address the need to leave intact the Memorial Monument to "Ellie." It is a WHITE BICYCLE mounted at the intersection of Pole Line Rd and Covell Blvd at the south east edge of the proposed Heritage Oak Park. This is a safety issue, as the Memorial Bicycle is a WARNING LABEL. It discloses the history and danger of this location to those who venture across the intersection on the way to the Park.

105-8

(7) CUT-THOUGH TRAFFIC

Letter 105 Cont.

105-8 Cont.

Unquestionably, the proposed Village Farms project will increase traffic on Pole Line Rd and Covell Blvd. Some of this burden will be placed upon the intersection of Pole Line Rd and Covell Blvd. Based on recent experience in congested California cities, one should anticipate that local streets in the surrounding neighborhoods will be burdened with diverted or "cut-through" traffic, such as Picasso Ave, Renoir Ave, Matisse St, and Moore Blvd.

Note that the Davis General Plan (Table 6, page 123, Section IV: Community Form, Chapter 2: Mobility) states that local streets are for "providing access to abutting property and designed not to accommodate or encourage through trips."

The cut-through traffic on local streets will be detrimental to the well-being and safety of the residents of the local streets. This needs to be addressed in the DEIR.

(8). GAS PIPELINE

105-9

A PG&E gas pipeline passes directly through the proposed Village Farms Project. The DEIR fails to indicate any recent inspection or status update on the pipeline condition. The DEIR fails to indicate whether the pipeline will tolerate extensive digging, being paved over, redirection/diversion of water drainage, and building construction.

(9) NEW FIRE STATION

105-10

The proposed new fire station on the proposed Village Farms project will be located 1.2 miles from the existing Davis Fire Station 31 (City of Davis Fire Headquarters). Staffing is the biggest expense in operating a fire station. Will staffing the proposed new fire station diminish the staffing or service abilities of the existing three Davis fire stations? If so, this would diminish the safety and well-being of the Davis residents who are serviced by the existing three fire stations. The DEIR is deficient in failing to study this staffing and service issue.

Furthermore, the proposed Village Farms project does not need a costly new Fire Station which would provide mostly medical assistance. The DEIR fails to discuss the establishment of a dedicated Emergency Medical System in the proposed Village Farms project area as an alternative to a Fire Station. A dedicated EMS could provide superior medical service at much less cost than a new Fire Station.

Thank you for considering my concerns about the Draft EIR for the proposed Village Farms project..

James Flanigan MD PhD
email: tinkymoto@aol.com
phone: (530) 757 6477

LETTER 105: JAMES FLANIGAN

Response to Comment 105-1
Please see Master Responses 1, 2, and 4.

Response to Comment 105-2
Please see Master Response 3.

Response to Comment 105-3
Please see Master Response 3.

Response to Comment 105-4
A detailed discussion regarding air quality and GHGs can be found in Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy in the Draft EIR. As discussed therein, mobile emissions were accounted for within the emissions modeling conducted for the Proposed Project/BRPA. Project-specific trip generation and VMT data provided by Fehr & Peers for full buildout of the Proposed Project and full buildout of the BRPA was applied to the project modeling. In addition, please see Response to Comment 47-1.

With respect to intersection safety, please see Master Response 5.

Response to Comment 105-5
Please see Master Response 2.

Response to Comment 105-6
Please see Master Response 5 with respect to traffic safety and Master Response 6 related to grade-separated crossings.

Response to Comment 105-7
Please see Master Response 5 with respect to traffic safety.

Response to Comment 105-8
Please see Response to Comment 191-3.

Response to Comment 105-9
On page 4.7-31, the Draft EIR notes that a significant hazard to the public or environment could be created without proper avoidance of the buried gas pipeline during construction. Mitigation Measure 4.7-2(f) requires preparation of site-specific safety guidelines for construction that occurs near the natural gas pipeline. The guidelines would be reviewed and approved by the City's Public Works Department. In addition, the gas pipeline was documented as part of the Phase I and II ESAs prepared for the Proposed Project.

Response to Comment 105-10
Staffing is not under the scope of CEQA; please see Response to Comment 75-51.

Letter 106

Dara Dungworth

From: Jamie Martin <jme.c.martin@gmail.com>
Sent: Monday, February 24, 2025 5:07 PM
To: Dara Dungworth
Subject: Cannery impact of proposed Village Farms development
Attachments: Cannery Letter to City re Village Farms 2-19-25.pdf

Categories: VFD Comment

CAUTION: **External email. Please verify sender before opening attachments or clicking on links.**

To Whom it May Concern,

I am writing to voice my strongest objection to the current proposal for the Village Farms development, specifically to its inclusion of routing traffic from the Village Farms through the Cannery. As a current Cannery resident, I can assure you, despite whatever the Environmental Impact Report might say, this will SIGNIFICANTLY negatively impact the day-to-day needs of the Cannery residents, especially at peak travel times. The Cannery has exactly 2 ways in and out, and neither was in actuality designed for the flow of traffic the Cannery alone needs.

106-1

Attempting to enter the Cannery from Covell traveling from the West is already plenty challenging, as there is literally only one way to do so, with a very short turn lane. Attempting to leave the Cannery heading South or East is also equally challenging during peak hours as there is only that same 1 option and similarly short turn lane. The idea that the City thinks it is somehow beneficial to be funneling MORE traffic through this incredibly small intersection not built for high traffic flow is preposterous. It is estimated that there will be an increase of 200%-400% in traffic along the Cannery Loop entrance/exit should this be approved in its current proposal. Considering the recent addition of a designated light at L Street along Covell, which would have direct access into and out of the Village Farms, it would make far more sense to design access there specifically to meet the needs of such a large proposed development.

Not only would the traffic within the Cannery suffer, but safety would as well. I understand the Cannery HOA has already sent you a detailed letter regarding some of the safety issues related to this proposed vehicular intrusion into our development, so I will refer you to that letter, attached to this email.

Please, please, please reconsider making life even more challenging for your fellow residents by increasing traffic and safety hazards in our community.

Thank you for your consideration.

Jamie Martin, Cannery Resident

LETTER 106: JAMIE MARTIN

Response to Comment 106-1

Please see Master Response 5 and responses to Letter 17.

Letter 107

Dara Dungworth

From: Janet Zwahlen <jz1613@gmail.com>
Sent: Monday, March 3, 2025 5:34 AM
To: Dara Dungworth
Subject: NO on this Village homes

Categories: VFD Comment

CAUTION: **External email. Please verify sender before opening attachments or clicking on links.**

107-1 Hello Dara. , Here is one more NO vote on this building project, It has so many reasons NOT to build it and here is one more reason, It will totally block my vision of the countryside , I have most of my view East blocked and this would finish it, Oh yes a flood plain would not be a good thing either,
That's all
Hoping that the majority vote it down too.
Janet Zwahlen

LETTER 107: JANET ZWAHLEN

Response to Comment 107-1

Please see Master Responses 1 and 4. In addition, potential impacts related to aesthetics were addressed in Chapter 4.1, Aesthetics, of the Draft EIR.

Letter 108

Dara Dungworth

From: Jay Feldman <jfeldman@omsoft.com>
Sent: Monday, January 13, 2025 3:31 PM
To: Dara Dungworth
Subject: Village Farms

Categories: Yellow Category

CAUTION: External email. Please verify sender before opening attachments or clicking on links.

Dear Dara,

108-1 I'm writing to express my opposition to the proposed development Village Farms. There are a number of reasons why this project is ill-concieved:

108-2 1. It is way too large in scope.
108-3 2. Building on a flood plain is foolhardy.
108-4 3. Contaminants from the former city landfill and sewage treatment plant just north of the site.
108-5 4. Severe adverse impact on traffic for Covell Blvd. and Pole Line Rd., which are already overcrowded during rush hours.
108-6 5. Devastating habitat impacts.

108-7 This is just a warmed-over version of Covell Village, which was defeated by Davis voters in 2000. I hope the planning department and City Council will have the good sense to reject this proposal.

Sincerely,

Jay Feldman
1506 Claremont Dr.
530-848-1211

LETTER 108: JAY FELDMAN

Response to Comment 108-1
Please see Master Response 1.

Response to Comment 108-2
Please see Master Response 1.

Response to Comment 108-3
Please see Master Response 4.

Response to Comment 108-4
Please see Master Response 3.

Response to Comment 108-5
Please see Master Response 5.

Response to Comment 108-6
Please see Master Response 7.

Response to Comment 108-7
Please see Master Response 1.

Letter 109

Dara Dungworth

From: Jaysun Pine <jaysunpine@gmail.com>
Sent: Monday, February 24, 2025 2:19 PM
To: Dara Dungworth
Subject: Village Farms Draft EIR

Categories: VFD Comment

CAUTION: **External email. Please verify sender before opening attachments or clicking on links.**

To Whom It May Concern:

109-1 As a homeowner in Davis I would like to voice my concerns and opposition to this new proposed development. Being the largest development to have ever been built in Davis it comes with many concerns. First, the added impact of traffic on Covell and Pole Line, already a notorious problem spot, is too much of a burden on our community. Why would we willingly make a known problem even worse? **109-2** Second, additional housing is not needed in Davis at this time as more housing has been built over the last several years (and continues to increase). **109-3** Third, tearing up farmland to build a subdivision is just poor use of land and is short sighted. The number of trees proposed to be torn down for re-routing of a water channel is ridiculous and a waste of our natural resources. **109-4** The additional air pollution from all of the added cars stuck in traffic trying to get in and out of the development, the increased traffic into the Cannery (elevating an already dangerous situation due to poor street design in the Cannery) , and the destruction of natural habitat used by wildlife in this area are all reasons to reject this project.

109-5 Lastly, this is on a well-known flood plain AND right next to a toxic site (former dump) that contains toxins in the ground and water (such as PCBs). Disturbing this soil will only release more toxins into our environment and should be left alone. **109-6** The open space of the current farm, flood plain and northern portion of this parcel provides an aesthetic buffer and wildlife corridor that will be destroyed by this unneeded subdivision. We all know the saying, "No Farms, No Food." Let's preserve the farmland we have left around Davis instead of making shortsighted decisions to please one developer trying to make money at the expense of our environment.

Thank you for your time,
Jaysun Pine
1065 Dolcini Ln
530-562-5100

LETTER 109: JAYSUN PINE

Response to Comment 109-1
Please see Master Response 5.

Response to Comment 109-2
Please see Master Response 1.

Response to Comment 109-3
Potential impacts to farmland were addressed in Chapter 4.2, Agricultural Resources, of the Draft EIR. With respect to trees and biological resources, please see Master Response 7.

Response to Comment 109-4
Please see Response to Comment 47-1, as well as Master Responses 5 and 7.

Response to Comment 109-5
Please see Master Responses 3 and 4.

Response to Comment 109-6
Potential impacts to farmland were addressed in Chapter 4.2, Agricultural Resources, of the Draft EIR. In addition, please see Master Response 1.

Letter 110

Dara Dungworth

From: Jean Jackman <jeanjackman@gmail.com>
Sent: Wednesday, February 12, 2025 4:44 PM
To: Planning Commission
Subject: Public comment on Village Farms DEIR for 2/12/25 meeting

Categories: VFD Comment

CAUTION: External email. Please verify sender before opening attachments or clicking on links.

2/12/2025

Dear Planning Commission,

110-1 Thank you for your work, for being on the planning commission. I know it involves lots of work, preparation for meetings, and using your brain. I'm sorry my comments won't be better organized but what I wrote, got trashed by accident and now I have to rush something to meet the 5 pm deadline.

110-2 My comment is on Village Farms DEIR. First, why are we looking at such a large development when we have reached our fair share. I think most Davisites like a smallish town. I think this is a poor development for many reasons:

110-3 1. Traffic would be horrible since there can only be an entrance on Pole Line Road. If any of this get built, it should have an underpass, paid for by the developers.

110-4 2. Vernal pools have been disced which is a shame and are reforming with the rains. That they were disced shows bad faith by the developers. They know better.

110-5 3. There is the flood plain of 200 acres. Today, I biked over the bridge on Stephenson Road. The Putah Creek today looks like a wide river, 8-10 times wider than usual. Our climate crisis is just going to get worse. Building on a flood plain should be ruled out as flooding will cost the city. Also, for some years, I taught in Winters for a couple of years. During the rainy season, County Road 31 would sometimes be flooded with a current. I would have to drive I80 and then 505 to avoid the flooded area by DQU.

110-6 4. There are known landfill toxics The plans are to build close to the Old City Landfill and Sewage Treatment Plant. Toxics and flooding would make a horrible stew.

110-7 5. The plan is for the park at Pole Line and Covell. There already is lots of traffic backup at times and with 1800 more dwellings, there would be LOTS of traffic. I wouldn't want my grandchildren and great grandchildren playing soccer surrounded by traffic fumes. The park should be in the center of the development.

110-8 6. The average home would be $700,000 to $800,000 plus many high end homes. The average price is more than many can afford. We need highly affordable housing so that our teachers and others can afford to live in this town.

110-9 7. Why is there not an alternative with fewer housing units with a different layout, avoiding the flood plain?

110-10 8. It is my understanding, that a new development brings a lot of new money into the city, but in about ten years, it will cost the city money. Developments don't pay for themselves.

110-11 9. This project would mean the destruction of 952 trees which will have habitat impacts. Birds are down by 30%. Extinction is happening with our climate crisis and loss of habitat. 952 trees is a lot of habitat.

1

110-12

10. I went to grad school at Stanford and we lived in married student housing. We had a 2 bedroom, 2 story. The row houses surrounded an oval of green. It was common to have latchkey children there as kids would look out from their homes onto the shared green, see other kids, and kids of different ages played together. Parents could see the kids. My daughter climbed a tree with roller skates on. The tree broke. Adult eyes were immediately on her since we all had windows onto the oval of green. Cars were parked in back of the houses. Each house had a small patio. It was such efficient living. It's a sadness that we can't build efficient, small houses like that. Pets were not allowed in that density and that made sense.

Please let's get creative with our housing and grow modestly and as slowly as possible. I think these developers need to start over.

Jean Jackman
306 Del Oro Ave.
Davis, CA 95616
530 756 3484

LETTER 110: JEAN JACKMAN (LETTER 1 OF 2, 02/12/25)

Response to Comment 110-1
Please see Master Response 1.

Response to Comment 110-2
Please see Master Response 1.

Response to Comment 110-3
Please see Master Response 5.

Response to Comment 110-4
Please see Master Response 7.

Response to Comment 110-5
Please see Master Response 4.

Response to Comment 110-6
Please see Master Response 3.

Response to Comment 110-7
Please see Master Response 5 and Response to Comment 47-1.

Response to Comment 110-8
Please see Master Response 1.

Response to Comment 110-9
Please see Master Response 2.

Response to Comment 110-10
Please see Master Response 1.

Response to Comment 110-11
Please see Master Response 7.

Response to Comment 110-12
Please see Master Response 1.

Letter 111

Dara Dungworth

From: Jean Jackman <jeanjackman@gmail.com>
Sent: Tuesday, February 25, 2025 11:43 AM
To: Dara Dungworth
Subject: Comments on Village Farms EIR

Categories: VFD Comment

CAUTION: **External email. Please verify sender before opening attachments or clicking on links.**

Dear Council,

111-1 Village Farms is way to big with many problems.

Traffic and gridlock at Covell Blvd. and Pole LIne Road with greenhouse gasses and air pollution health suffering.

111-2 Where is a good alternative with lesser impacts?

111-3 This is being planned over a 200-acre flood plain next to the old unlined City Landfill and Sewage Treatment Plant.

111-4 There is no protection of vernal pools.

111-5 No bike/pedestrian safe access guaranteed.

111-6 This is mostly unaffordable housing when they could create housing like Stanford Married Student Housing, efficient and with high density.

This seems uncreatively and poorly planned and too big.

Jean Jackman

306 Del Oro Ave

Davis, CA 95616

JeanJackman@gmail.com

530 756 3484

LETTER 111: JEAN JACKMAN (LETTER 2 OF 2, 02/25/25)

Response to Comment 111-1
Please see Master Responses 1 and 5, as well as Response to Comment 47-1.

Response to Comment 111-2
Please see Master Response 2.

Response to Comment 111-3
Please see Master Responses 3 and 4.

Response to Comment 111-4
Please see Master Response 7.

Response to Comment 111-5
Please see Master Response 5.

Response to Comment 111-6
Please see Master Response 1.

Letter 112

Dara Dungworth

From: Meith/Garrett <meithgarrett@comcast.net>
Sent: Monday, February 24, 2025 12:09 PM
To: Dara Dungworth
Subject: Comments on DEIR-Village Farms

Categories: VFD Comment

CAUTION: External email. Please verify sender before opening attachments or clicking on links.

112-1 My name is Jeffrey Meith. My wife is Yvonne Garrett. We reside at 940 Pierce Lane, in The Cannery. We are submitting our comments on the Village Farms DEIR.

We support and fully endorse the comments of The Cannery HOA, of which we are members.

112-2 The DEIR is woefully silent, as best we've observed, as to the timing of buildout of the project. Given the scope of this project, that constitutes and inadequacy of the DEIR. That information is important in analyzing there accuracy and adequacy of the EIR. Projects with a development timeline exceeding 5 years cannot adequately be assessed in a single EIR. The EIR should specify a timeline to which it applies, and the project should not be entitled for a period exceeding the reasonable timeline specified in the EIR.

112-3 The DEIR is misleading in asking the reader to assume that the road extension of the project, into The Cannery, connecting to Cannery Loop at the traffic circle, is no more that an "extension" of Cannery Loop. It suggests that Cannery Loop is already "stubbed" to accommodate the project. The DEIR errors. Such connection is not an extension of Cannery Loop. Cannery Loop is already complete. It extends around the exterior (except for Pierce Lane) of The Cannery. The "loop" is closed. Moreover, the referenced traffic circle is narrow (consistent with the narrow surface streets in The Cannery) with a tight circle, and could not reasonably be expected to accommodate traffic from the proposed development. It does not safely accommodate traffic today. There is no stub out to the proposed project. The circle is dangerous at the existing level of usage, and the addition of morning and late afternoon traffic from the project cannot be safely accommodated.

112-4 Access via F Street should be included in the project, not mere study of that alternative. The project should be conditioned on providing vehicle access to F Street. Given the levels of traffic on East Covell, and Pole Line, and the clear inadequacy off Cannery Loop to accommodate more traffic at the roundabout, coupled with the large number of dwelling units to the north, an outlet to F Street is clearly required.

Respectfully submitted,

Jeffrey A Meith
Yvonne M Garrett
940 Pierce Lane
Davis, CA 95616

1

LETTER 112: JEFFREY MEITH AND YVONNE GARRETT

Response to Comment 112-1
Please see Master Response 1 and responses to Letter 17.

Response to Comment 112-2
Contrary to the comment, the Draft EIR discusses project timing on page 4.3-47 within Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy. As discussed therein, the Proposed Project or the BRPA would be built out over four phases across approximately seven years. However, a requirement related to EIRs evaluating projects that would exceed five years does not exist under CEQA. EIRs are only required to address the "whole of the action with the potential for either a direct physical change in the environment, or a reasonably foreseeable indirect physical change." Therefore, the Draft EIR is adequate.

Response to Comment 112-3
Please see Master Response 5.

Response to Comment 112-4
Please see Master Response 5.

Letter 113

Dara Dungworth

From: jennifer culp <jendyc@gmail.com>
Sent: Sunday, February 9, 2025 12:43 PM
To: Dara Dungworth
Subject: Comments on village homes project

Categories: VFD Comment

CAUTION: External email. Please verify sender before opening attachments or clicking on links.

Hello,

113-1 As a north Davis resident I have a number of concerns about the proposed village homes project.
1) size of project is too large at 1800 units that would have a huge impact on infrastructure and environment and quality of life for current residents.

113-2 2) who is going to pay for infrastructure?traffic is already a mess on pole line and covell.... Would need to build another road in and out.
The argument that people would use public transit is folly. As someone who has traveled extensively in Europe without a car. Davis has practically non existent public transit system.

113-3 3) not exactly affordable housing we currently rent as could not afford to buy here

113-4 4) it's a flood plain and as recent climate change events have demonstrated its only a matter of time....

113-5 I recognize Davis needs more housing but this project as it currently stands isn't the solution. What about 1/2 the units, more dense and require developer to build another road or subsidize better public transit in Davis. Also mitigation measures for floods.

Thank you in advance.
Jennifer Culp
Sent from my iPhone

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LETTER 113: JENNIFER CULP

Response to Comment 113-1
Please see Master Response 1.

Response to Comment 113-2
Please see Master Responses 1 and 5.

Response to Comment 113-3
Please see Master Response 1.

Response to Comment 113-4
Please see Master Response 4.

Response to Comment 113-5
Please see Master Response 2 related to alternative developments. In addition, Chapter 4.8, Hydrology and Water Quality, includes Mitigation Measures 4.8-4 and 4.8-5 to address potentially significant impacts related to flooding. Regarding transit, Mitigation Measure 4.13-3(b) within Chapter 4.13, Transportation, of the Draft EIR requires the project applicant to fund a Transit Services and Facilities Plan to identify transit service and facility improvements related to unmet transit needs and fund identified improvements, subject to applicable agency approval (e.g., City, Unitrans, and Yolobus approval).

Letter 114

Dara Dungworth

From: tinkymoto@aol.com
Sent: Tuesday, February 11, 2025 10:28 PM
To: Planning Commission
Subject: Village Farms DEIR Deficiency

Categories: VFD Comment

CAUTION: **External email. Please verify sender before opening attachments or clicking on links.**

To the City of Davis Planning Commission,

114-1 A glaring deficiency in the DEIR is the lack of a Reduced Footprint Alternative. In the NOP Comments found in Appendix B of the DEIR is a letter from the County of Yolo Department of Community Services (includes Planning, Building and Public Works) to the City of Davis that states, " The Draft EIR should consider a reduced footprint alternative that defines the northern project boundary south of the existing Davis Drain."

On December 12, 2023, in person at the sole public meeting heard by the City Council to discuss alternatives to the proposed Village Farms Project, I suggested such a Reduced Footprint Project more specifically. It had a 200 acre footprint which was south of Channel A (the Davis Drain) and completely avoided the Flood Plain. There would be 900-1000 units.

114-2 As such, my proposed project was over a 1000 feet from the old Davis Dump where garbage was burned for years. This dump was unlined and without a leachate collection system.

Not being in the Flood Plain, my plan would obviate the need to dig out a 100+ acre crater adjacent to the old Dump.

114-3 Being located south of Channel A means that the hundreds of trees, plants, and critters that call Channel A home are left in peace.

114-4 Reducing the number of units from 1800 to 900-1000 would be beneficial to the health of the tens of thousands of us who daily pass through the intersection of Covell and Pole Line.

114-5 Recall that CEQA [15126.6(a)] requires that an EIR include a discussion of reasonable project alternatives that would "feasibly attain most of the basic objectives of the project, but would avoid or substantially lesson any significant effects of the project..."

In summary, work on the DEIR needs to continue and consider a Reduced Footprint Alternative.

Jim Flanigan MD PhD
Davis resident

LETTER 114: JIM FLANIGAN (LETTER 1 OF 2, 02/11/25)

Response to Comment 114-1
Please see Master Response 2.

Response to Comment 114-2
Please see Master Responses 2 related to alternatives and 3 related to hazards.

Response to Comment 114-3
Please see Master Response 7.

Response to Comment 114-4
Please see Master Response 2.

Response to Comment 114-5
Please see Master Response 2.

Letter 115

Dara Dungworth

From: Carolyn Flanigan <carolynjoflanigan@gmail.com>
Sent: Tuesday, February 11, 2025 11:14 PM
To: Planning Commission
Subject: Fwd: Fw: Village Farms DEIR Deficiency

Categories: VFD Comment

CAUTION: **External email. Please verify sender before opening attachments or clicking on links.**

---------- Forwarded message ---------
From: **tinkymoto@aol.com** <tinkymoto@aol.com>
Date: Tue, Feb 11, 2025 at 11:10 PM
Subject: Fw: Village Farms DEIR Deficiency
To: carolynjoflanigan@gmail.com <carolynjoflanigan@gmail.com>

----- Forwarded Message -----
From: tinkymoto@aol.com <tinkymoto@aol.com>
To: PlanningCommission@cityofdavis.org <planningcommission@cityofdavis.org>
Sent: Tuesday, February 11, 2025 at 10:27:46 PM PST
Subject: Village Farms DEIR Deficiency

To the City of Davis Planning Commission,

A glaring deficiency in the DEIR is the lack of a Reduced Footprint Alternative. In the NOP Comments found in Appendix B of the DEIR is a letter from the County of Yolo Department of Community Services (includes Planning, Building and Public Works) to the City of Davis that states, " The Draft EIR should consider a reduced footprint alternative that defines the northern project boundary south of the existing Davis Drain."

115-1

On December 12, 2023, in person at the sole public meeting heard by the City Council to discuss alternatives to the proposed Village Farms Project, I suggested such a Reduced Footprint Project more specifically. It had a 200 acre footprint which was south of Channel A (the Davis Drain) and completely avoided the Flood Plain. There would be 900-1000 units.

As such, my proposed project was over a 1000 feet from the old Davis Dump where garbage was burned for years. This dump was unlined and without a leachate collection system.

Not being in the Flood Plain, my plan would obviate the need to dig out a 100+ acre crater adjacent to the old Dump.

Being located south of Channel A means that the hundreds of trees, plants, and critters that call Channel A home are left in peace.

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Letter 115 Cont.

115-1 Cont.

Reducing the number of units from 1800 to 900-1000 would be beneficial to the health of the tens of thousands of us who daily pass through the intersection of Covell and Pole Line.

Recall that CEQA [15126.6(a)] requires that an EIR include a discussion of reasonable project alternatives that would "feasibly attain most of the basic objectives of the project, but would avoid or substantially lesson any significant effects of the project..."

In summary, work on the DEIR needs to continue and consider a Reduced Footprint Alternative.

Jim Flanigan MD PhD
Davis resident

LETTER 115: JIM FLANIGAN (LETTER 2 OF 2, 02/11/25)

Response to Comment 115-1

Please see Responses to Comments 114-1 through 114-5.

Letter 116

Dara Dungworth

From: Joan Martinez <joanmartinez5@sbcglobal.net>
Sent: Monday, February 24, 2025 8:36 AM
To: Dara Dungworth
Subject: Village Farms Project

Categories: VFD Comment

CAUTION: External email. Please verify sender before opening attachments or clicking on links.

I am in agreement with the following statement opposing the development of Village Farms written by Eileen Samitz:

116-1 "**Overview: Village Farms is the largest project ever proposed in Davis for 1,800 units on almost 500 acres. The project has a lot of problems primarily because it is a handicapped site with a 200-acre flood plain, and it is adjacent to the unlined Old City Landfill and Sewage Treatment Plant with a long history of leakage into the ground water of toxics and other chemical contaminants (now including carcinogenic PFAS "forever chemicals"). The Covell Blvd. and Pole Line Rd. area already has enormous traffic and adding 1,800 housing units would exacerbate it. There would be no bicycle/pedestrian safe access via an undercrossing or overcrossing from the west, north or south, and now the DEIR is questioning the "feasibility" of a Pole Line Undercrossing to the east. Additionally, there would be all the costs imposed by the enormous amount of infrastructure needed, as well as the massive impacts on the native plants, wildlife and habitat from re-routing Channel A and tearing out 952 trees. Beyond all that, the housing would be unaffordable to local workers and young families with average incomes since the homes would be at least $700,000-$800,000 with a major number of them being $1 million and over. It is also important to recognize that the project is *not* infill per our General Plan which defines infill as land that is within the City limits, and Village Farms is *outside* the City limits in Yolo County.**

116-2 **- Building hundreds of housing units on the 200 acres of a FEMA Zone A Flood Hazard flood plain makes no sense** and would bring flooding problems. A fundamental planning principal is you DO NOT build on enormous flood plains like this. Not only because of the climate change issues we are experiencing, but because there is legislative law now that the State will no longer financially bail out cities foolish enough to build on flood plains like this when disaster happens. The chances of that are more now likely than ever, due to climate change. Will north Davis resident need to buy flood insurance due to Village Farms?

116-3 -**The toxics and other chemical contaminants leaking into the groundwater from the Old City Landfill and Sewage Treatment Plant located immediately adjacent to Village Farms**. This includes carcinogenic PFAS "forever chemicals" and manganese exceeding maximum concentration levels recently found from monitoring wells. How many people will want to buy a home of at least $700,000 to over $1 million sitting on land with contaminated groundwater with chemicals like PFAS's that cause cancer? There are also solid toxics exceeding MCL's including lead, arsenic, and toxaphene which is a neurotoxin and potential carcinogen.

116-4 -**Traffic impacts which would be incredibly worse than it is now from adding 1,800 more housing units at Covell Blvd. and Pole Line Road** which is already incredibly impacted. No one is going to believe that shoe-horning in 1,800 units on this Village Farms site is going to be "environmentally superior" because it makes no sense. It is illogical in particular since the City

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Letter 116 Cont.

116-4 Cont. has no plan to significantly improve its currently minimal, inconvenient and inadequate public transit system which is designed primarily to serve UCD's needs. Creating higher densities without the infrastructure of a robust transit system would only impact the environment far more due to more traffic.

116-5 **- Massive infrastructure costs including an un-needed new Fire Station because 90% of the fire department calls are medical, NOT fire related issues**. Instead, what is needed, and has been advocated for years, is an Emergency Medical Service (EMS) which would be a fraction of the cost. How many Davis residents want to pay for the $14 million it would cost to build the fire station and then the multi-millions of dollars it would cost to pay for the additional staffing (including more fire fighters), equipment and operational costs long term into the future? Also, how could a fire truck possibly get onto Covell Blvd.(particularly to go east) when the traffic is backed up most of the time?

116-6 **-Uncertain "feasibility" of the only bicycle/pedestrian grade-separated crossing for safe access particularly for children. The Pole Line bike/pedestrian undercrossing is now *uncertain* since the DEIR says it has not yet determined its "feasibility".** This is likely due to existing infrastructure such as underground utilities and the land needed for its construction, particularly on the east side of Pole Line Roa near Moore Ave.Furthermore, even *if* it is feasible, the developer is *not* committing to covering all the costs for the undercrossing. How many Davis residents are willing to subsidize the millions of dollars for that project? This is a major access component of the project however; the DEIR admits that it is not even sure if the undercrossing is feasible due to other existing infrastructure. Why don't they have an answer yet? When? After the vote?

116-7 -**Unaffordable housing where the vast majority of the homes will be McMansion's**, Market homes will not be cheaper thn $700,000 - $800,00 but the majority of them will be well over $1 million. This does not help our average workers or particularly families with young kids, so this project will *not* help bring a lot of kids to the schools contrary to the developer's claims. This housing would *not* help workers and young families with average incomes since they will not be able to afford these homes.

116-8 **- Habitat impacts including tearing out 952 trees to dig up to expand and re-route Channel A** which will have significant impacts on the habitat and raises major concerns about potential flooding issues.

116-9 **In summary, Village Farms is proposing 1,800 units on roughly 400-acres is the largest residential project ever proposed in the City of Davis, on a site with a plethora of problems, impacts and costs.** It is located at one of the most highly impacted area of traffic in the City at Covell Blvd. and Pole Line Road which would be massively worse . There are toxics issues, flooding risks, access issues, public safety issues, and enormous costs that would be imposed on Davis residents. Therefore, this project needs to be rejected just as Covell Village was for the same reasons and more."

Joan Martinez
1233 Auburn Dr
Davis
Sent from my iPad

LETTER 116: JOAN MARTINEZ

Response to Comment 116-1
Please see Response to Comment 75-1.

Response to Comment 116-2
Please see Response to Comment 75-2.

Response to Comment 116-3
Please see Master Response 3.

Response to Comment 116-4
Please see Master Response 5. In addition, potential impacts to transit were evaluated under Impact 4.13-3 of the Draft EIR.

Response to Comment 116-5
Please see Responses to Comments 75-51 and 75-52.

Response to Comment 116-6
Please see Master Responses 6 related to the grade-separated crossings.

Response to Comment 116-7
Please see Master Response 1.

Response to Comment 116-8
Please see Master Response 4 related to flooding and 7 related to trees and habitat.

Response to Comment 116-9
The comment is a summary of the foregoing comments. See Responses to Comments 116-2 through 116-8 above for specific responses.

Letter 117

Dara Dungworth

From: John Hingtgen <johnalum@uwalumni.com>
Sent: Tuesday, February 11, 2025 11:21 AM
To: Planning Commission
Subject: Village Farms Project

Categories: VFD Comment

CAUTION: **External email. Please verify sender before opening attachments or clicking on links.**

Dear Members of the Planning Commission,

117-1 I live in Yolo County a few miles from the proposed project. I have noted a steep decline in native plants and animals in our area, and I am opposed to further development which may impact these species. This proposed project has many impacts, but the impacts to plants and animals and their habitat are sufficient reasons for the City to turn down the project. Please reject the project. Thank you.

John Hingtgen
Yolo County resident

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LETTER 117: JOHN HINGTGEN

Response to Comment 117-1

Please see Master Response 7.

Letter 118

Dara Dungworth

From: John Hurst <john.hurst77@gmail.com>
Sent: Tuesday, February 25, 2025 2:53 PM
To: Dara Dungworth
Subject: Objections to the Village Farms development proposal

Categories: VFD Comment

CAUTION: **External email. Please verify sender before opening attachments or clicking on links.**

Dear Dara,

My name is John Hurst. My wife, Julie, and I recently moved to Davis from Palo Alto, CA in the spring of 2023. We live at 2306 Cezanne Court in close proximity to the proposed Village Farms development.

In the interest of time, I am going to be direct and pointed in my opposition of this development:

118-1

1. The Northwest border of this development abuts the old Davis Dump. I am not a scientist, but my guess is there are Forever Chemicals embedded in the soil of that dump. If approved, the environmental impact of containment due directly to construction of this development could lead to a serious problem. Given the recent election, it would be folly to expect any white horses arriving from the Federal Government via the EPA in helping with cleanup efforts. And even if there were, what a mess.

118-2

2. Over half the development sits on a flood plain. It is absurd to think this is a good idea given the scientific facts around Climate Change. Strong winter storms bringing Atmospheric Rivers of rain is not an anomaly any longer. Per my earlier point, we can not expect any help from the Feds in the foreseeable future should this development take place and homes impacted by being on a *flood plain*.

118-3

3. Traffic on Poleline Road is already a thing. With the developments popping up in 'North Davis' aka Woodland, current traffic should increase on its own. Can you imagine adding 1,800 homes with the only way in is from Poleline as best I can tell?

118-4

4. The farm land currently there is a natural fire break. While Davis is flat, we have seen over the recent days and years devastating wildfires in all parts of California. Especially where there is wind patterns. With FEMA's budget getting slashed by DOGE once again don't expect the Feds to be in a position to help should a wild fire break out for any reason and fueled by the winds that frequent this neighborhood.

118-5

You add all this up and the size, scope, and scale of this project is just too big. The challenges of environmental cleanup, 1/2 the land resting on a flood plain, the increase in traffic on Poleline etc make this project a terrible idea.

Thank you for your time and consideration of my input.

Sincerely,

John Hurst
2306 Cezanne Court
Palo Alto, CA 95618

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John Hurst
john.hurst77@gmail.com | 650.380.6889

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LETTER 118: JOHN HURST

Response to Comment 118-1
Please see Master Response 3.

Response to Comment 118-2
Please see Master Response 4.

Response to Comment 118-3
Please see Master Response 5.

Response to Comment 118-4
While the comment does not address the adequacy of the Draft EIR, potential impacts related to wildfire are discussed in Chapter 4.15 of the Draft EIR. As noted on page 4.15-5 and according to CAL FIRE, larger fires (defined as 10 acres or greater) did not occur in Yolo County in 2023 and 2024.

In addition, as discussed under Impact 4.15-2 on page 4.15-14 of the Draft EIR, development of the site with the proposed uses would reduce the risk of wildland fire to surrounding areas because site improvements would reduce the amount of readily combustible vegetation currently on-site, thereby acting as a true fuel break.

Response to Comment 118-5
Please see Master Response 1.

Comments on Village Farms EIR

2/25/2025

From: John Johnston, PhD, PE

Transportation and GHG mitigation through improving transit access

119-1 General Plan policies TRANS 3.1 and 3.3 call for convenient, reliable, safe, and attractive fixed route, commuter transit to meet public transportation needs and that new development should be designed to *maximize* transit potential. In addition, the CAAP contains Action TR.6 Expand Public Transit. In its existing form, the project does not adequately address these aspirations. Transit skirts the project site now and after construction, will still skirt the site. Adding a single bus stop on Covell Blvd will not change this and does not make the project a transit-oriented neighborhood.

This can be remedied by designing the interior roadways so that buses can traverse the central spine of the neighborhood. Figure 1 shows existing transit routes with 1200' radius circles drawn around bus stops (including the new one proposed in the project). These circles approximate a 0.25 mi walking distance which, according to the FHWA, is the outer limit of what pedestrians consider convenient. (Ref: https://safety.fhwa.dot.gov/ped_bike/ped_transit/ped_transguide/ch4.cfm). Accordingly, the area inside the circles represents the area conveniently served by that stop. If buses are allowed to traverse the interior of the project, along the yellow line in Figure 2, the area of convenient coverage expands. In particular, coverage would extend to all of the RMD, RMHD, and affordable housing areas. These neighborhoods are likely the ones where convenient transit will be most desired by residents. As a bonus, routing transit through the project serves some areas of the adjacent Cannery neighborhood. The effort needed to accommodate this change in the project is little more than adjusting clearances on the interior roads to accommodate buses, not major redesign.

119-2 The buses routed through the project by the means described above will likely be Unitrans vehicles. To use Yolobus, residents of the project would have to travel a considerable distance to Covell Blvd and may want to use bikes or scooters rather than walk. A bus stop that accommodates secure bicycle and scooter storage constructed on Covell would encourage use of Yolobus. I recommend its addition to the project as part of the overall "maximizing transit" strategy.

Making transit more accessible increases its attractiveness and use. Increased transit use reduces VMT impacts, air pollutant emissions (ROG, NOX, and PM10), and GHG emissions. As such, this proposal represents a potential mitigation measure across three impact areas. It would be appropriate for the final EIR to include an analysis of the potential mitigation effects of this notion (i.e. maximizing bus access inside the project) so that the project proponents and city officials can decide whether to include this feature in the final project.

119-2 Cont.

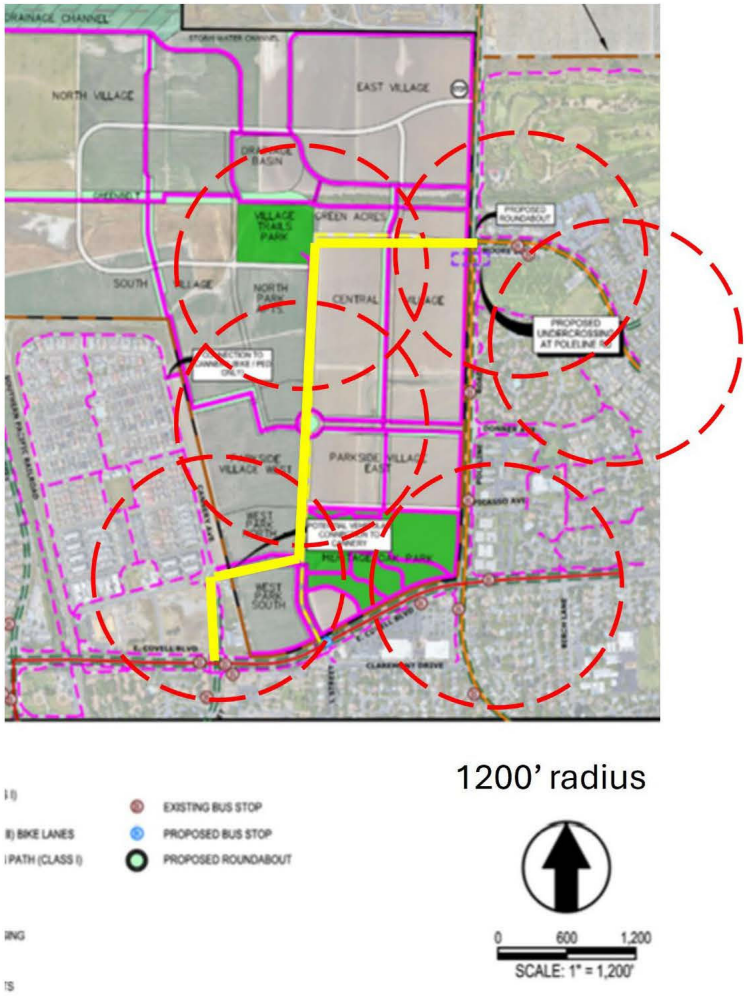


Figure 2 Transit routed through the project interior (yellow line) on proposed streets. Same 1200' radius circles drawn around likely bus stops. These circles show much more of the project and the adjacent Cannery project would be convenient to transit. In particular, the RMD, RMHD, and affordable housing neighborhoods are better covered.

119-3

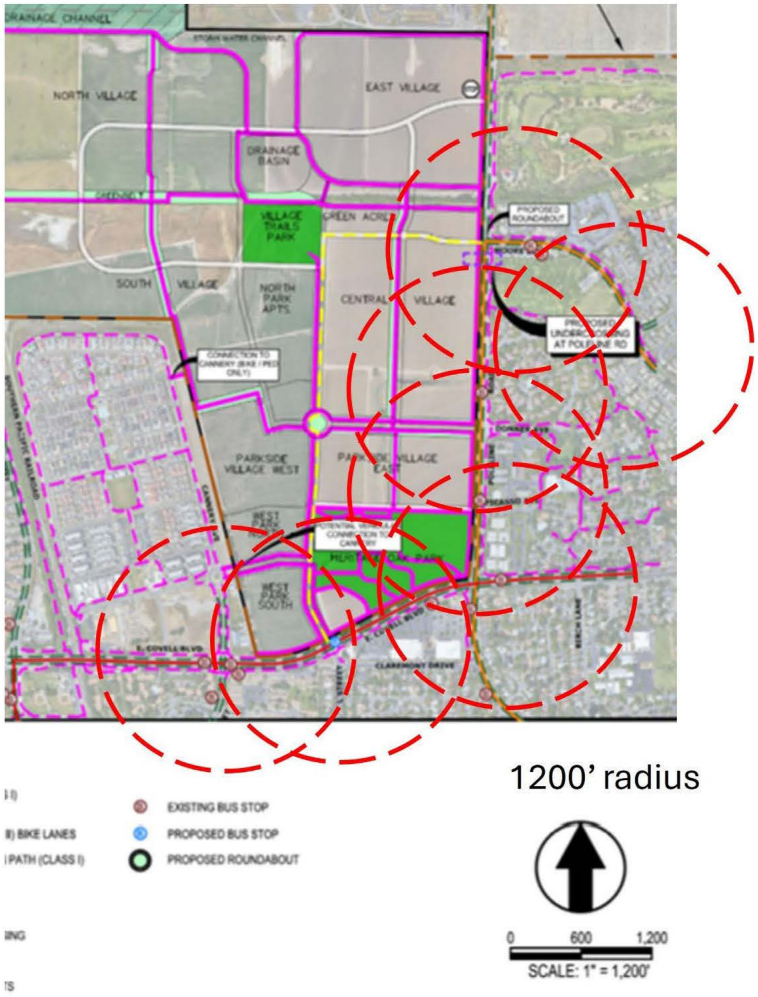


Figure 1 Existing transit route with 1200' radius circles drawn around bus stops. This would approximate a convenient 0.25 mi walking distance and thus represents the area "covered" by that stop. The proposed transit stops are less convenient for the dense and affordable neighborhoods than the alternative shown in Figure 2.

Greenhouse Gas Mitigation Comments

119-4

Utilizing the benefits of the UATA

The UATA represents 118 acres of open land that could be used by the city for nature-based carbon removal in accordance with CAAP actions CR.1 Carbon Sequestration and Removal and CR.2 Carbon Farm Plans. Part of it could be considered as a community solar site as per CAAP action BE.5 Community Solar Energy. To the extent that these side-projects could be developed, they would represent GHG mitigation actions.

119-5

VMT efficiency, CAAP actions, and the Environmentally Superior Alternative

On page 4.3-78 the text points out that CAAP Action TR.11 includes no explicit reference to new housing having to be at or below the City's VMT per capita thresholds and that therefore the fact that the proposed project would result in an increased per capita VMT does not in itself render the project inconsistent with Action TR.11. While this is technically correct, it ignores the larger city goal in the CAAP – carbon neutrality by 2040. Permitting new development that is less VMT efficient (VMT/cap) than the existing population certainly leads the city away from its stated goal. Just as you cannot reduce the gasoline consumption of a vehicle fleet by adding less efficient vehicles, you cannot reduce overall city GHGs if each person added to the Davis population emits more GHGs than the existing populace.

119-6

Accordingly, Mitigation Measure 4.3-8 should be implemented to the extent needed to bring the per capita GHG rate to the level of or below the city average *at the outset of the project*, not later. Some measures listed there, like adopting energy star appliances and rooftop solar are already cost effective. The intent is to produce the best project possible now and *not* kick the GHG can down the road as suggested by Measure 4.3-8.

119-7

An even more effective approach would be adopting the environmentally superior alternative (Higher Number of Units – Same Footprint Alternative). As pointed out in Chapter 7, the VMT efficiency is surprisingly good (18.4 VMT/cap vs. the city average or 30.1), and since transportation makes up almost 90% of the annual GHG emissions (16,262 out of 18,160 MT/y, Table 4.3-19), maximizing transportation efficiency is a very effective strategy for reducing overall emissions, not to mention that the environmentally superior alternative generates the most housing units, which is a current policy goal of the city.

Although this is perhaps not a comment on the EIR itself, the EIR process is intended to generate information on which to base good decisions. Based on the information in this document, I urge the project proponents and city officials to seriously consider adopting the Higher Number of Units – Same Footprint Alternative or some version between the current proposal and the environmentally superior alternative.

LETTER 119: JOHN JOHNSTON

Response to Comment 119-1

As discussed under Impact 4.13-3 in Chapter 4.13, Transportation, of the Draft EIR, the project site/BRPA site is located in close proximity to five existing bus stops, which would be increased to a total of six with the construction of a new bus stop on East Covell Boulevard at L Street. Furthermore, Mitigation Measure 4.13-3(b) would require the completion of a Transit Service and Facilities Plan for the area encompassing the project site/BRPA site and other development along the north side of the Covell Boulevard and Mace Boulevard corridor between the westerly city limits and the I-80 interchange. The Transit Service and Facilities Plan would provide funding for future transit facilities improvements. Overall, the Proposed Project/BRPA would not conflict with General Plan Policy TRANS 3.1 or TRANS 3.3. However, the determination of the project's consistency with the City's General Plan policies is ultimately the decision of the Davis City Council.

As noted on page 4.3-77 within Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy, of the Draft EIR, Action TR.6 of the CAAP does not apply to the Proposed Project/BRPA because the action relates to a program that has not yet been developed within the City.

Response to Comment 119-2

Figure 3.8 of the Draft EIR Chapter 3 identifies the onsite mobility and circulation plan including a proposed bus route through Moore Boulevard and L Street, with a bus stop at L Street and Covell Boulevard, including sufficient street width to accommodate busses. The project design is supportive of a bus route through the spine of the development and envisions bus stops near the Pre-K Learning Center and multifamily housing, as well as stops at the north portion of the project.

The applicant has had meetings with the regional transit providers and is working with DJUSD to advocate for the formal addition of these bus stops by Unitrans. In addition, the project is committed to working with a regional micro-transit provider to support multiple locations throughout the development to achieve the .25 walking distance metric to mass transit.

Response to Comment 119-3

Please see Response to Comment 119-2.

Response to Comment 119-4

As noted on page 4.3-77 of the Draft EIR, Actions CR.1 and CR.2 of the CAAP do not apply to the Proposed Project/BRPA because the actions relate to programs that have not yet been developed within the City.

As discussed under Impact 4.3-8 on page 4.3-78 of the Draft EIR, all on-site residents would also have the opportunity to opt into receiving energy from VCE, ensuring that the Proposed Project/BRPA would be consistent with Action BE.5, which also encourages all subscribers to enroll in the VCE UltraGreen option.

Response to Comment 119-5

As noted by the comment, the analysis within the Draft EIR is accurate. The City's goal of carbon neutrality by 2040 is addressed through Mitigation Measure 4.3-8 of the Draft EIR.

Response to Comment 119-6

As noted on page 4.3-80 of the Draft EIR, implementation of Mitigation Measure 4.3-8 would achieve a downward trajectory of operational GHG emissions and ensure that development of the Proposed Project/BRPA would not result in long-term operational impacts related to GHG emissions or the creation of conflicts with an applicable regulation. In addition, as specified in Mitigation Measure 4.3-8, the project proponent shall indicate how to complete and implement each of the specified steps prior to the approval by the City of the entitlement for each phase of the Proposed Project or the BRPA. Please also see Response to Comment 32-8.

Response to Comment 119-7

Please see Master Response 2.

Letter 120

Dara Dungworth

From: JohnK <cjbuyer2@comcast.net>
Sent: Wednesday, February 12, 2025 4:59 PM
To: Planning Commission
Subject: Comments on Agenda item 5a - Village Farms Davis Draft Environmental Impact Report

Categories: VFD Comment

CAUTION: External email. Please verify sender before opening attachments or clicking on links.

Good afternoon Planning Commission members,

120-1 The proposed project will add a substantial number of residents to the City of Davis. This increasing population will generate significant air quality emissions, resulting in health and safety impacts.

120-2 I object to increasing our health risks without real mitigation measures. Real mitigation, to me, results in a net zero impact. Lots of tricks get projects approved with a cumulative negative impact on us.

I oppose the Village Farms project.

This needs to stop.

John Keller
1411 Cornell Dr
Davis

LETTER 120: JOHN KELLER (LETTER 1 OF 2, 02/12/25)

Response to Comment 120-1

Please see Master Response 1. Potential impacts related to air quality are discussed in Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy, of the Draft EIR.

Response to Comment 120-2

Please see Master Response 1. In addition, under CEQA, a significant effect on the environment is defined as a substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the project. Mitigation measures must be implemented as part of the Proposed Project, but only to the extent that the measures reduce potential adverse impacts to a less-than-significant level. Contrary to the assertion made by the comment, less-than-significant levels related to air quality and GHG emissions do not necessarily equate to a net-zero impact, but are related to quantitative thresholds established by various agencies.

Nonetheless, Mitigation Measure 4.3-8 requires the project proponent to prepare and implement a GHG Reduction Plan to demonstrate a downward trajectory in GHG emissions towards the goal of zero net GHG emissions by the year 2040.

2/24/2025

Dara Dungworth, Staff coordinator for public comments
Proposed Village Farms project
City of Davis
Davis, CA

Good morning, Dara Dungworth.

121-1

I am writing to urge the City to *reject* the Draft Environmental Impact Report for the proposed Village Farms project. CEQA requirements are minimum standards and the developer shows us their bag of tricks to deal with minimums. Minimums? Whatever happened to the City's pursuit of excellence?

Instead of working towards an excellent project, the City championed a sales tax increase; chose to defer road maintenance; and looked the other way while the Cannery developers walked away from their promises to the Farms neighbors. And this was in favor of a huge project on landfill runoff? With increased greenhouse gases and more air pollution, this project makes a mockery of the City's "commitment" to environmental goals.

Don't cynically sully the name of Village Homes. Reject the DEIR and this project.

Sincerely,
John C Keller
John Keller
1411 Cornell Drive
Davis, CA 95616

LETTER 121: JOHN KELLER (LETTER 2 OF 2, 02/24/25)

Response to Comment 121-1

Please see Master Response 1.

Letter 122

Dara Dungworth

From: John Zeller <zeller.jp@gmail.com>
Sent: Tuesday, February 11, 2025 8:40 PM
To: Dara Dungworth
Subject: Village Farms - DEIR: fresh lipstick, same old pig

Categories: VFD Comment

CAUTION: **External email. Please verify sender before opening attachments or clicking on links.**

Greetings Dara,

122-1 I am not trying to be offensive but reviewing the history on this parcel of land and the new Village Farms development proposal, it invokes my mental image of the old reference about "lipstick on a pig". What has changed at this site since the first proposal in 1992 when enormous problems were identified and development abandoned (i.e. toxics, an enormous flood plan, traffic congestion, access issues and infrastructure needs)? This site still has all the old limitations and defects, made worse by a proposal that is going in the wrong direction! At 1,800 homes, to say the massive scale and scope of this project is overwhelmingly adverse for our neighborhood, is an understatement!

122-2 The 1,800-unit Village Farms project is just way too big and has far too many negative impacts and costs. The DEIR cites far too many impacts that remain "Significant and Unavoidable" even after mitigation. This project would present potential city liability issues regarding toxics, flooding and public safety issues.

122-3 Davis needs housing and needs affordable housing, but it is grossly inequitable to pile the burden of building affordable housing on the few hundred market rate homes in the project. This pushes the price of the market rate homes to a level out of reach for many of those that might need these homes the most. Providing affordable housing is a citywide responsibility. These costs should be shared equitably by everyone in Davis, not just the few in this development.

122-4 Furthermore, Chapter 4.11 indicates the Village Farms project together with several other residential subdivisions currently proposed (including Palomino Place with 175 residential units and Shriners Property with 1,200 residential units), would result in a total of 4,345 new residential units within the City of Davis which far exceeds the City of Davis RHNA Allocation and exceeds the requirements for the expected population growth of the City. Some or possibly all of these projects could be scaled back dramatically and still meet the City's housing needs.

122-5 **Traffic:** Traffic impacts are a major concern! To assume Village Farm residents are going to make significant use of public transit is a joke (a false assumption), just like in the Cannery. It's not happening and there is nothing in the proposal that might change this. This will be another automobile centric neighborhood that will result in further gridlock on Covell Blvd, Pole Line Rd and beyond. Increasing traffic will exacerbate environmental impacts with more greenhouse gases and air quality deterioration that can't be mitigated.

122-6 **Access issues:** As a Cannery resident, I am especially concerned about the potential ingress/egress, to/from Village Farms through the Cannery roundabout via Cannery Avenue to Covell Blvd. This will be a natural path for Village Farms residents that will turn an already unsafe traffic circle into a nightmare (children on bicycles and cars don't mix well). Other serious access issues

Letter 122 Cont.

122-6 Cont. include no bicycle/pedestrian access via F Street because of the railroad tracks and the questionable "feasibility" of a Pole Line Road undercrossing due to existing infrastructure issues, so there may not be a Pole Line bicycle/pedestrian undercrossing either.

122-7 This is not a good, viable project as proposed.

Thanks for your consideration,
John Zeller
1000 Berryessa Lane, #414
Davis, CA 95616

LETTER 122: JOHN ZELLER

Response to Comment 122-1
Please see Master Response 1.

Response to Comment 122-2
Please see Master Responses 1, 3, 4, and 5.

Response to Comment 122-3
Please see Master Response 1.

Response to Comment 123-4
Please see Master Response 1.

Response to Comment 122-5
Please see Master Response 5 and Response to Comment 47-1.

Response to Comment 122-6
Please see Master Responses 5 and 6.

Response to Comment 122-7
Please see Master Response 1.

Letter 123

Dara Dungworth

From: John Zhang <dlzhang1974@gmail.com>
Sent: Monday, February 24, 2025 1:37 PM
To: Dara Dungworth
Subject: OPPOSE Village Farms DEIR Project

Categories: VFD Comment

CAUTION: **External email. Please verify sender before opening attachments or clicking on links.**

Dear Dara,

123-1 I really have a concern about this project. I am living in Wildhorse. The Covell Blvd. and Pole Line Rd. area already has enormous traffic and adding 1,800 housing units would exacerbate it. There would be no bicycle/pedestrian safe access via an undercrossing or overcrossing from the west, north or south. Please review this plan based on these concerns.

Best regards,

Jenny Zhao
3039 Audubon Cir
Davis, CA95618

LETTER 123: JOHN ZHANG

Response to Comment 123-1

Please see Master Response 5.

Letter 124

Dara Dungworth

From: Jonathan Martin <jonathan.p.martin@gmail.com>
Sent: Monday, February 24, 2025 6:23 PM
To: Dara Dungworth
Subject: Feedback regarding proposed Village Farms Davis Development
Attachments: 2025-02-24 - Cannery Letter to City re Village Farms 2-19-25.pdf

Categories: VFD Comment

CAUTION: **External email. Please verify sender before opening attachments or clicking on links.**

Dear Ms. Dungworth,

I gather that you have already received a letter from the Cannery HOA board (attached for again for your reference).

I am a current resident of the Cannery and full-throatedly agree with their concerns about the impact of the proposed development of Village Farms Davis.

As a resident and current father of young children, I have serious concerns about how the proposed development would impact traffic patterns within the Cannery, particularly at the south end of the development.

124-1 There are currently only two ways to leave the Cannery heading west onto Covell, and only a single way to leave the development toward points east along Covell or south along J St. At peak traffic times, there are already long lines at the light at J St. and Covell to turn left/east, and many cars waiting at the stop sign at Market St and Covell to turn right/west onto Covell, as Covell is a heavily trafficked arterial road during commute times. The proposed development of Village Farms Davis would increase traffic along Cannery roads by 200-400% and the lack of adequate connection to arterial roadways would dramatically increase traffic congestion during commute times, adversely affect the environment of the Cannery, and increase the risk of traffic accidents to children like my own who walk and bike to our local schools and our elderly residents who frequently walk in the neighborhood.

While I appreciate the need to comply with state-mandated increases in housing supply, under no circumstances do I support such a massive residential development in this location where there is already heavy traffic congestion. To do so without major reworking and expansion of traffic capacity (which would be nearly impossible due to the surrounding area already being developed) would be a short-sighted solution that creates more problems for the surrounding community.

Sincerely,

Jonathan Martin
1027 Dolcini Ln.
Davis, CA 95616

1

LETTER 124: JONATHAN MARTIN

Response to Comment 124-1

Please see Master Response 5 and the responses to Letter 17.

Letter 125

Dara Dungworth

From: Judy and Doug <hitchfeld@sbcglobal.net>
Sent: Sunday, February 23, 2025 5:27 PM
To: Dara Dungworth
Subject: Comments on Draft EIR for proposed Village Farms Development

Categories: VFD Comment

CAUTION: **External email. Please verify sender before opening attachments or clicking on links.**

From: Judith Feldman and Doug Hitchcock 2213 OKEEFE PLACE DAVIS, CA 95618

Our comments concerning the EIR for the proposed Village Farms Development:

125-1 *As we understand it the EIR for the proposed Village Farms project which is located outside the Davis City limits and would include 1800 housing units does not adequately address serious impacts and consequences should the project be approved. The proposed development raises the same serious issues which resulted in the rejection of prior versions of this proposed project.*

125-2 *Traffic impacts at Covell Blvd and Pole Line Road would result in even more serious congestion than we are now experiencing and that was cited for previously proposed projects envisioned for this land as almost twice as many units are proposed and more farm land will be converted to housing.*

125-3 *There is, in addition, concern regarding the moving of the drainage ditch and adding land north of its current location that borders the hazardous waste site of the old Davis landfill to increase the acreage included in this development over that of previous proposals. This would seriously impact the wildlife and trees in that area and possibly cause toxic wastes to infiltrate water neither of which have been adequately addressed. Adding this additional land may also encroach on the 5-mile agricultural buffer that has been in place between Davis and Woodland until now.*

125-4 *Regarding access for pedestrians, bicycles, and emergency vehicles, where exactly will these be, especially if a new fire station is not built, which will only be needed because of the lack of access created by the project for those housed in it? As we understand the proposal, the developers will not be paying for the fire station so will it become the responsibility of the Davis taxpayers?*

125-5 *It is important to adequately address these issues and additional ones that may be raised by other residents of Davis before approving the EIR. Please pay attention to the concerns of neighborhood residents who will be directly adversely impacted by the proposed development in its current form.*

Sincerely,

Judith Feldman and Doug Hitchcock

LETTER 125: JUDITH FELDMAN AND DOUG HITCHCOCK (LETTER 1 OF 2, 02/23/25)

Response to Comment 125-1
Please see Master Response 1.

Response to Comment 125-2
Please see Master Response 5.

Response to Comment 125-3
Please see Master Responses 3 and 7.

Response to Comment 125-4
The portion of the comment about access is unclear. Access points are clearly shown on Figure 3-8 of the Draft EIR. Funding is not a CEQA issue; please see Master Response 1.

Response to Comment 125-5
Please see Master Response 1.

Letter 126

RECEIVED
FEB 2 5 2025
City of Davis
Community Development

Judith Feldman Doug Hitchcock 2213 OKEEFE PLACE DAVIS, CA 95618

Our comments concerning the EIR for the proposed Village Farms Development:

As we understand it the EIR for the proposed Village Farms project which is located outside the Davis City limits and would include 1800 housing units does not adequately address serious impacts and consequences should the project be approved. The proposed development raises the same serious issues which resulted in the rejection of prior versions of this proposed project.

Traffic impacts at Covell Blvd and Pole Line Road would result in even more serious congestion than we are now experiencing and that was cited for previously proposed projects envisioned for this land as almost twice as many units are proposed and more farm land will be converted to housing.

There is, in addition, concern regarding the moving of the drainage ditch and adding land north of its current location that borders the hazardous waste site of the old Davis landfill to increase the acreage included in this development over that of previous proposals. This would seriously impact the wildlife and trees in that area and possibly cause toxic wastes to infiltrate water neither of which have been adequately addressed. Adding this additional land may also encroach on the 5-mile agricultural buffer that has been in place between Davis and Woodland until now.

126-1

Regarding access for pedestrians, bicycles, and emergency vehicles, where exactly will these be, especially if a new fire station is not built, which will only be needed because of the lack of access created by the project for those housed in it? As we understand the proposal, the developers will not be paying for the fire station so will it become the responsibility of the Davis tax payers?

It is important to adequately address these issues and additional ones that may be raised by other residents of Davis before approving the EIR. Please pay attention to the concerns of neighborhood residents who will be directly adversely impacted by the proposed development in its current form.

Sincerely,

J. Feldman, Doug Hitchcock

Judith Feldman and Doug Hitchcock

LETTER 126: JUDITH FELDMAN AND DOUG HITCHCOCK (LETTER 2 OF 2, 02/25/25)

Response to Comment 126-1

Please see Response to Comments 125-1 through 125-5.

Letter 127

Dara Dungworth

From: Judy Ennis <ennisjudith06@gmail.com>
Sent: Tuesday, February 25, 2025 5:30 PM
To: Dara Dungworth
Cc: Rochelle Swanson
Subject: DCAN comments on the DEIR

Categories: VFD Comment

CAUTION: **External email. Please verify sender before opening attachments or clicking on links.**

Dear Dara,

Thank you for this opportunity to submit a comment on behalf of the Davis Community Action Network (DCAN) about the draft EIR for the Village Farms project. As a community organization, we support expanding access to climate smart, affordable housing that centers community. We believe the best way to reach our goal of more climate-smart development is through higher density projects with fewer single family homes and a greater share of smaller, attached units configured for social connection. We also support projects that demonstrate a high level of energy resilience through innovative uses of available technology and through climate-smart building design.

We see the potential benefits of both the Biological Resource Preservation alternative and the alternative 4, which includes a higher number of units within the same footprint. If there is a possibility to maintain the same number of units in a smaller footprint, we would welcome that analysis. We also see a number of drawbacks to these potential designs as they stand today that could be mitigated through additional design choices. Some of these benefits and drawbacks are explained in the following comments.

127-1

1.
2.
3. In the BRPA, the VMT and resulting Greenhouse Gas emissions are too high. To lower the negative impact,
4. we strongly support expanding the transit options by increasing the housing density of the project, especially along transit corridors, and planning roadways to prioritize future bikes and buses. We also strongly support the necessary protected crossings (either
5. over or under) for bicycles and pedestrians to connect to other bike paths and ensure safety from car traffic.
6.

127-2

2.
3.
4. To mitigate the overall emissions, we strongly support the addition of a microgrid or community energy
5. system, with full electrification using renewables. We suggest a feasibility study be completed as soon as possible to determine the impact of a microgrid on lowering the emissions of the project overall and therefore aligning with our climate goals (as outlined
6. in the CAAP) without lowering the number of new potential housing units for the City of Davis.
7.

Letter 127 Cont.

127-3

We are pleased with the focus on the missing middle with smaller units and we would suggest a further increase in the number of attached units to increase the density overall, potentially increase affordability, and lower energy consumption.

127-4

We are pleased with the indicated inclusionary housing set aside at 20%, which is 5% above the minimum requirement. Considering the housing crisis across our state and the high levels of housing insecurity right here in Davis, we want to ensure more affordable homes are built as soon as possible. We want the promised 20% affordable housing with a separate downpayment assistance program to hold through all future configurations of the project, even if the density is altered in response to the DEIR comments from the community.

Lastly, We would like to note that we are excited that the wetlands identified on the site are set aside in the BRPA proposal.

Thank you,
Judy Ennis
Davis Community Action Network

LETTER 127: JUDY ENNIS

Response to Comment 127-1
Please see Master Responses 1, 2, and 5.

Response to Comment 127-2
Please see Response to Comment 29-22.

Response to Comment 127-3
Please see Master Response 1.

Response to Comment 127-4
Please see Master Response 1.

Letter 128

Dara Dungworth

From: Julia Sherman <juliasherman27@gmail.com>
Sent: Tuesday, February 25, 2025 10:13 PM
To: Dara Dungworth
Subject: Public Comment on Village Farms Project

Categories: VFD Comment

CAUTION: **External email. Please verify sender before opening attachments or clicking on links.**

Good evening Principal Planner Dungworth,

I am emailing today to submit a public comment in opposition to the proposed Village Farms Project. Below you will find a list of reasons why I am opposed to this project:

128-1

- Given that the tract of land in question is considered a flood plain, I consider it irresponsible to develop the land.

128-2

- A development of this size cannot feasibly be supported by the existing infrastructure in North Davis. Traffic is already impacted on Pole Line Road and Covell Blvd, which will be further exacerbated by developing 1800 units on this parcel of land. We do not have sufficiently accessible public transit on the North side of town to accommodate these additional residents.

128-3

- Where will the money come from to build required infrastructure to support the increased population in this part of town?

128-4

- As an agricultural worker, I see great value in the agricultural land that is currently being utilized on the flood plain. Not only is this land used to produce food, it provides a natural habitat for wildlife in the neighborhood, including trees currently growing on the plot of land in question.

Thank you for taking my concerns into consideration.

Sincerely,
Julia Sherman

LETTER 128: JULIA SHERMAN

Response to Comment 128-1
Please see Master Response 4.

Response to Comment 128-2
Please see Master Response 5.

Response to Comment 128-3
Please see Master Response 1.

Response to Comment 128-4
Please see Master Responses 1 and 7. Potential impacts to agricultural resources are discussed in Chapter 4.2, Agricultural Resources, of the Draft EIR.

Letter 129

Dara Dungworth

From: Julie Schmidt <jschmidt2boys@gmail.com>
Sent: Thursday, February 13, 2025 3:08 PM
To: Dara Dungworth
Subject: Village Farms

Categories: VFD Comment

CAUTION: External email. Please verify sender before opening attachments or clicking on links.

129-1

As a Davis resident, I want to voice my strong concerns about the Village Farms development !
Please vote against this project. I hate what's happening to what used to be a charming town.
We are already overwhelmed with building without the infrastructure to support it. The condition of our city streets are a great example of what needs your attention!
And as someone who lives near the university- WHERE ARE THE POLICE ON THE CORNERS WHERE STUDENTS NEVER-NEVER STOP 🛑! Now that electric scooters and bikes are everywhere-I'm surprised their hasn't been a serious accident or worse on Sycamore Avenue!!!
PLEASE, please vote no on this project. Farmland is a part of what makes Davis a town I love!
Respectfully,
Julie Schmidt
Sent from my iPhone

1

LETTER 129: JULIE SCHMIDT

Response to Comment 129-1

Please see Master Response 1.

Letter 130

Dara Dungworth

From: Julie Stone <dancingjewel3@gmail.com>
Sent: Tuesday, February 25, 2025 4:29 PM
To: Dara Dungworth
Subject: Village Farms

Categories: VFD Comment

CAUTION: **External email. Please verify sender before opening attachments or clicking on links.**

To Dara Dungworth:

I am one of many Davis children that has grown up here and have fond memories of my childhood. Enough so that I have chosen to come back and raise my own children here. When raising a family there are really a few big considerations:

Safety: I grew up riding my bike all over town. As there were many bike paths, fewer cars, and no speeding e-bikes, or e-scooters, I was able to be quite independent and my school and after school activities transit was always on bike, rollerblades, or by foot.

130-1 The Village Farms proposal is for 1,800 to 2,700 homes. With the current limited public transportation options, the need for most every family to have a car to access work, family, schools, competitive sporting events with our children, shopping... and the reality that not every person is able-bodied enough to walk/ride a bus, must be assumed. This reality causes a strain on the very air we breathe. The roads along this development plan already suffer from car congestion and the greenhouse gases associated with driving and especially idling. This amount of air toxicity (including neurotoxins) is especially dangerous for our children and their developing brains riding their bikes through exhaust fumes.

Without safe options for children to transport themselves from this development, parents hold a responsibility to be certain their children remain healthy. Thus, driving the children to school, sports events, friends homes.... This, of course adds to the amount of congestion and greenhouse gases.

While CEQA does not include traffic impacts in the DEIR, there are enough environmental concerns to rethink this project.

130-2 **Housing:** My siblings and I grew up in a modest home and I am fortunate to have my own home near my childhood house. It has always been a large expense to buy a house - especially in California. Davis homes are no exception. Maintaining a home is an additional expense that seems to never end. The Village Farms project is planned on a known flood plain. As we experience climate change, this is dooming the proposed residents to a myriad of expenses - water damage, including to their house foundations, increasing insurance premiums (that's happening to us without living on a flood plain!!) The current DEIR seems to be planning to channel the water through Wildhorse. That's ethically inappropriate. When coupled with the well- known toxins existing in the Village Farms project area from the old city landfill, this becomes a liability to residents' health and the financial well-being of the City. Think Slide Hill Park trees...

130-3 **Education:** My family struggled financially to move to Davis to give me and my siblings a good education. This was before the School Board discarded the residency requirement. I only bring this up because decisions have consequences. And I am asking the Commission to truly consider the consequences of this ill-planned project. Consequences that will be apparent quickly (increased greenhouse gases) and less obvious consequences that make take time to reveal themselves. I am aware this project is being touted as the panacea to declining school

1

130-3 Cont.

enrollment. Without safe and direct access to schools there is not a realistic assumption that vehicle miles traveled will not be by car. The current DEIR does not have a remedy for how pedestrians and bike riders (not e-bike) can access Birch Lane, Koramatsu, or Harper Lee. As over 1400 school children are currently being transported to school from other districts by car, any further additions to the schools without pedestrian and bike safe routes will only add to the fumes from idling cars during travel, drop off, and pick up. Resulting in more environmental degradation from exhaust vapor, particulate pollution from tire wear, and roadway disintegration.

130-4

Heath: As a nurse I am especially aware of the limited services in our small hospital. No mental health care or inpatient pediatric care. Sutter Davis is not a trauma hospital. Patients in serious health crisis must be transported to Sacramento. Large housing projects like Village Farms will put additional strain on an already limited system. While this does not directly fall under the purview of CEQA, the environmental impacts of unresolved mental health problems and the need to transport patients to Sacramento should not be ignored. Additional air and water pollution is not in keeping with a community's good health. We all need to breathe.

130-5

As an aside, KCRA News just reported today that Cal Fire released the new "Fire Hazard Severity Zones." Yolo County has more than 35,000 acres at High or Very High tiers. The environmental impacts of house fires - less containable when homes are built close together - are only becoming more and more known. Sadly.

Please reconsider the Village Farms DEIR - what it says as well as what it is conveniently leaving out or understating. I am opposed to housing on this site.

Julie Stone
914 Plum Lane
Sent from my iPhone

LETTER 130: JULIE STONE

Response to Comment 130-1
Please see Master Response 5 and Response to Comment 47-1.

Response to Comment 130-2
Please see Master Responses 1, 3, and 4.

Response to Comment 130-3
Please see Master Responses 1 and 5.

Response to Comment 130-4
Please see Master Response 1.

Response to Comment 130-5
Potential impacts related to wildfire are evaluated in Chapter 4.15 of the Draft EIR. As discussed therein, significant impacts related to wildfire were not identified for the Proposed Project or the BRPA.

Letter 131

Dara Dungworth

From: Juliette Beck <juliettebuxtonbeck@gmail.com>
Sent: Tuesday, January 14, 2025 4:30 AM
To: Dara Dungworth
Subject: Tiny home communities in Davis?

CAUTION: **External email. Please verify sender before opening attachments or clicking on links.**

Hello Dara,

131-1 I have been raising my family along the F street corridor for the past 16 years. I have been active in the local climate movement advocating for a just transition to an equitable, ecologically regenerative Yolo bioregion.

131-2 I am concerned that the Village Farms development is missing an opportunity to advance more just and truly sustainable, environmentally and socially responsible ways of living. This sprawling proposed development, despite the sustainability efforts, is still not doing nearly enough to lower the ecological footprint of the average homeowner.

I am planning on attending the Village Farms community meeting this evening to ask the developers if there is still space and room for a tiny home community in this development. Will you be in attendance? It would be nice to meet you!

131-3 I am also concerned about the impact of this development on people living with a tiny carbon footprint adjacent to the property. **What outreach has been done to the houseless community living along the railroad right of way?** What is the plan for houseless people (I'm concerned for one elderly couple in particular that have been living in this area for over 20 years)? **Will they be displaced by this project?** A tiny home community could address this critical need for housing.

131-4 **I'd also like to discuss the possibility of creating a tiny home community on the city-owned ag buffer land on the east side of the Cannery**. This area was supposed to be farmed to grow food for Cannery residents but the soil is too impoverished and compacted by heavy trucks. Lots of money and effort has been spent on this strip of land. It will need extensive and costly rehabilitation to be fertile again. **It's an ideal site for a tiny home community, no?**

131-5 If Village Farms is approved, then there will no longer be a need to buffer against agriculture so this land could be better put to use as a model tiny home community organized as a land trust. **Who should I meet with to discuss this possibility?**

I can be reached at 530-902-8407 and welcome the opportunity to discuss these issues with you.

Thank you,
Juliette Beck

--
****
Mother, eco-justice advocate, writer
co-founder, YoloSol Collective

"California faces a water and climate crisis that will only be solved by foregrounding Indigenous management practices. Our restorative environmental management and tribal place-based knowledge are best practices for climate resiliency. If we teach the next generation how to better manage and live with the land, they will become the leaders that can solve our challenges." **--Dr. Cutcha Risling Baldy**, Chair, Humboldt State Native American Studies Department

LETTER 131: JULIETTE BECK (LETTER 1 OF 2, 01/14/25)

Response to Comment 131-1
Please see Master Response 1.

Response to Comment 131-2
Please see Master Response 1.

Response to Comment 131-3
Please see Master Response 1.

Response to Comment 131-4
Please see Master Response 1.

Response to Comment 131-5
Please see Master Response 1.

Letter 132

February 22, 2025

Dara Dungworth, Principal Planner
City of Davis Department of Community Development
23 Russell Boulevard
Davis, CA 95616
ddungworth@cityofdavis.org

Re: Comments on the Draft EIR for the Village Farms Davis Project (SCH #2023110006)

To Whom it May Concern,

132-1 Thank you for the opportunity to comment on the draft EIR for the Village Homes project. Given the nearly 500 acres size, its location and natural features, this site provides unique opportunities and challenges. I offer these recommendations as a climate just transition specialist, co-founder of a Yolo bioregional arts and ecology collective, parent, nearby resident and renter for the past 16 years.

1. **ALTERNATIVES**

a) **Include Model Sustainable Cooperative Housing Options in Each Planned Neighborhood**

132-2 The City of Davis has underserved residents, including our family, that would like to live in cooperative housing. Both Dos Pinos and Muir Commons, built over 30 years ago, have extensive wait lists. We are fortunate to have in Davis the Center for Cooperative Development. Their recent report: California Cooperatives: Today's Landscape of Housing Cooperatives lays out the benefits of Limited Equity Housing Cooperatives (LEHCs) as stable, time-tested, affordable housing. Each neighborhood in the Village Homes should include a LEHC similar to Dos Pinos with a minimum of 60 units. LEHCs will provide homes for households that are priced out of traditional single-family homeownership including housing that is deemed affordable. In California the LEHC maintains affordability in perpetuity through a mandated cap on appreciation when shares are sold from one member to the next. It also prevents speculation by directing that any sale, or profits from a sale, of the entire development go to a nonprofit and not members.

The energy for these Housing Cooperatives should be supplied by on-site, solar-powered micro energy grids. They should be built with greywater systems, composting systems, green space and gardens to grow food. Each neighborhood coop should have a community center with a kitchen and common eating area, high quality HVAC system and backup battery storage so that these buildings can serve as community resilience-centers during extreme weather events such as heat waves and windstorms.

Community swimming pools or water play area and playgrounds made of natural materials with shade structures should also be incorporated into the design of each neighborhood.

b) **Include 'Tiny Home' Community**

132-2 Cont.

The project should include at least one 'tiny home' community for people that want to minimize their ecological footprint. A tiny home is a small dwelling typically under 500 square feet, designed for efficient use of space and often promoting a minimalist lifestyle. A number of people now live along the Southern Pacific Railroad Right Away and the F Street Corridor who will be significantly impacted by the project. Some of these community members have expressed interest in living in a tiny home. Tiny homes could be a humane and dignified solution to minimize the impacts of the project on this population and should be constructed in the early phases of the project.

Tiny homes should not be limited to houseless people as there are a number of young professionals and couples and people of all socio-economic backgrounds that would choose to live in a tiny home as a way of minimizing their impact on the environment. A study of the market demand for tiny homes should be conducted and analyzed as an environmentally superior, high density housing option.

2. TRANSPORTATION

a) **Reduce VMT by Prioritizing Workforce Housing**

132-3

Affordable housing is a key factor in reducing the number of commuters into Davis on a daily basis. People who work in Davis including teachers, City of Davis employees, and UC Davis employees should be prioritized in the allocation of new housing.

b) **Improve connectivity between adjacent neighborhoods**

132-4

Pedestrian/bike/scooter overpasses or underpasses across Covell to the North, Pole Line to the East and F Street to the West should be required in the development agreement.

The neighborhoods should be connected by public transit routes.

c) **Prioritize Public Transit**

132-5

The cumulative traffic impact of new developments in Woodland and Davis should be mitigated by working with public transit providers to greatly increase bus and shuttle service, especially along Pole Line and Covell. Bee-line micro-transit stops should be integrated into each neighborhood.

132-6

d) **Incentivize car-free living**

132-6 Cont.

Dedicate space in each neighborhood for a community car-share fleet that includes a mini van and truck. Prioritize housing for residents that choose to live without a personal automobile. Incentivize car-free living by limiting the space dedicated to garages and parking.

Create commercial property to provide basic services within a fifteen minute walk of all residents. This should include Village Stores, created in partnership with the Davis Food Co-op.

3. CULTURAL RESOURCES

132-7

Please include the Cultural Resources Study in its entirety in the Appendix (Tom Origer & Associates. *Cultural Resources Study for the Village Farms Davis Project, Davis, Yolo County, California*. March 20, 2024.)

The field survey conducted by Tom Origer & Associates found two obsidian isolates on-site, consisting of a biface fragment and a flake. A map displaying exactly where the obsidian flakes were found on this site should be included in this section.

132-8

On Pages 4.5 - 3 and 4.5-4, the location of Yocha Dehe Wintun Tribal Lands should be **western** not eastern Yolo County.

132-9

Please describe and add to the table on page 4.5-13 any obsidian flakes or other cultural artifacts that have been identified in any of the six previous cultural resource studies conducted at this site and the four studies conducted within a .25-mile of the project area.

132-10

Please add that a burial site was recently uncovered in the summer of 2023 within one mile of the project site, at the location of the Davis High School, during recent construction of the new STEM building.

132-11

The Highly Sensitive Resource Area (Figure 4.5-3) in the southern portion of the site that includes a seasonal creek bed should be considered a cultural resource. The proposed Heritage Oak Park should center the heritage of this land as a place that was tended to by Patwin-Wintun people, and efforts should be made to design the park in partnership with Patwin-Wintun cultural experts to provide opportunities for restoring traditional ecological stewardship. This could be a proactive mitigation measure given the significant impacts to cultural resources. An example of such a park was recently established in Solano County: https://yochadehe.gov/2024/08/25/newest-open-space-park-tied-to-patwin-heritage/

Instead of a "Demonstration Farm," work with Davis High School students trained in TEK (traditional ecological knowledge) to create a space for teaching and demonstrating Wintun Homeland Ecological Stewardship. Consider creating a wildlife rehabilitation center where residents can bring heat-stressed wildlife to receive care during heat waves. Instead of a fire station, create a center for teaching culturally prescribed burning and the critical role that fire plays in healing the land.

Letter 132 Cont.

4. HAZARDOUS MATERIALS

132-12

The Heritage Oak Park is planned to be located on land where the old farmhouse was which has very high levels of toxaphene (pg. 4.7-6) present in the soil at 1,000 - 1,200,000 mg/kg. The DTSC maximum acceptable level is 450 mg.kg. Lead is present in levels 6.6 - 93 mg/kg and the DTSC and CA Ecological Risk Office maximum level is 80 mg/kg. Asbestos has not been evaluated inside of the water tank house but could be present. The site should be remediated of all toxins prior to use as a park.

A 1,000 foot wide no-build zone should be established around the unlined Old Davis Landfill and the sewage treatment plant. Ongoing monitoring and disclosure of manganese and PFAS should be conducted to determine if higher concentrations are present in the soil and water. More extensive groundwater testing should be conducted to determine the possible flow of contaminants in the aquifer. Stormwater runoff should also be tested to ensure that contaminants are not spreading into the stormwater channels and poisoning wildlife.

Respectfully submitted,

Juliette Beck

juliettebuxtonbeck@gmail.com

530-902-8407

LETTER 132: JULIETTE BECK (LETTER 2 OF 2, 02/22/25)

Response to Comment 132-1
See Master Response 1.

Response to Comment 132-2
See Master Response 2.

Response to Comment 132-3
Please see Master Response 1.

Response to Comment 132-4
Please see Master Response 6.

Response to Comment 132-5
Please see Response to Comment 113-5.

Response to Comment 132-6
Please see Master Response 1.

Response to Comment 132-7
Based on the sensitive nature of cultural and tribal cultural resources, cultural resource studies and the exact location of any identified resources are kept confidential.

Response to Comment 132-8
Referring to the tribe as located within eastern Yolo County is consistent with the descriptions provided by Tom Origer and Associates, who also prepared the Cultural Resources Study for the Proposed Project. Revisions to the Draft EIR are not required.

Response to Comment 132-9
Any previously identified cultural resources were discussed on page 4.5-6 and 4.5-8. As noted on page 4.5-8, the field survey conducted as part of the Cultural Resources Study prepared for the Proposed Project found two obsidian isolates on-site: a biface fragment and a flake made of Napa Valley obsidian with wear from water tumbling. As such, the cultural resources previously identified on-site are described in the chapter. Table 4.5-1 on page 4.5-13 describes the previous studies, authors, dates, and study numbers for all previous studies within the study area and a 0.25-mile buffer. Therefore, providing such information in the table is unnecessary.

Response to Comment 132-10
Based on recent discoveries during construction, the City consulted extensively with the Yocha Dehe Wintun Nation. As a result, mitigation measures, including on-site monitoring by the Tribe, were included as part of the Draft EIR.

Response to Comment 132-11
As described on page 4.5-1 of the Draft EIR, Precontact resources are those sites and artifacts of or related to a time period, generally prior to contact with people of European descent. The bed of a seasonal creek is not inherently considered a cultural resource site; as explained on page 4.5-16 of the Draft EIR, the references to the area as “highly sensitive” are intended to convey

the area's higher likelihood of containing buried archaeological site indicators. In addition, please see Response to Comment 132-10 above.

Response to Comment 132-12

Please see Master Response 3.

Letter 133

Dara Dungworth

From: Karen Larssen <klarssenkl@gmail.com>
Sent: Tuesday, February 25, 2025 4:24 PM
To: Dara Dungworth
Subject: Opposition to the proposed Village Farms housing development

Categories: VFD Comment

CAUTION: External email. Please verify sender before opening attachments or clicking on links.

To: Dara Dungworth
From: Karen Larssen, North Davis Homeowner

Hello Dara,

I am writing in opposition to the proposed Village Farms housing development.

133-1

I think it is dangerous to build this development in a flood plain because of possible flooding.
Building homes in this location would include tree-removal and destruction of wildlife habitats.
It is dangerous to build housing adjacent to the old, unlined, previous City Landfill and the old, previous Sewage Treatment Plant. At risk would be seepage of carcinogenic PFAS/"forever chemicals" which would endanger residents' health.
This development would significantly increase traffic which would increase greenhouse gasses and air pollution from vehicle emissions.
This project is not "infill" housing because it is not within the Davis City limits. It is in Yolo County, outside the Davis City Limits.
Projected prices of $700,000 to $800,000 and higher would not be "affordable" to most first-time homebuyers or to workers of average income, particularly families with young children. This development would not help to increase our local school population.

The negative impacts, including significant costs to the City of Davis, make this project ill advised and undesirable to our City and our residents.

Respectfully submitted,

Karen Larssen, North Davis Homeowner
134 Luz Place
Davis

LETTER 133: KAREN LARSSEN

Response to Comment 133-1

Please see Master Responses 1, 3, 4, 5, and 7, as well as Response to Comment 47-1.

Letter 134

Dara Dungworth

From: Kathleen Curry <kcurry652@gmail.com>
Sent: Friday, February 21, 2025 7:07 AM
To: Dara Dungworth
Subject: Village Farms Project

Categories: VFD Comment

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134-1

After viewing the February 12 City Planning meeting online, I have many concerns about the Village Farms project:
toxic water
toxic soil
flooding
motor traffic flow
safety for cyclists and pedestrians.
In fact, what is right about this project? The site itself precludes any expectation that housing should be built.
It's amazing to me that it's being considered.
Kathleen Curry
Davis resident of 40 years who would like to see affordable housing built in Davis

LETTER 134: KATHLEEN CURRY

Response to Comment 134-1

Please see Master Responses 1, 3, 4, and 5.

Letter 135

Dara Dungworth

From: kltimmons6@gmail.com
Sent: Wednesday, February 12, 2025 2:06 PM
To: Planning Commission
Cc: Will Chao
Subject: Comment on Village Farms project

Categories: VFD Comment

CAUTION: External email. Please verify sender before opening attachments or clicking on links.

Dear Planning Commission,

As a Cannery resident, my primary concerns with the proposed Village Farms project are below:

1. Disruption/damage to The Cannery Urban Farm. The EIR proposes paving a high-traffic road through the middle of our urban farm in order to connect the highest-density portion of the proposed development to our Cannery traffic circle. As imagined, designed, and built, The Cannery was sold to us as having an urban farm, and it is an essential portion of our community. Allowing such blatant disruption of the farm would run contrary to the concept of the The Cannery homes that our residents bought in to.

135-1 2. Traffic safety concerns related to our already unsafe narrow roads. The EIR study by GHD indicates that the relevant portion of Cannery Loop currently carries 970 average daily trips, and the study expects that the Village Farms project will more than double average daily trips to 2,000; on a cumulative plus project basis, GHD expects that average daily trips along the southern edge of Cannery Loop would approximately quadruple over time to 4,200, roughly equivalent to the level of vehicular traffic currently seen on secondary arterial roads such as L Street and J Street. Based on the sheer scale of the Village Farm, this would create unacceptable safety hazards, especially to our vulnerable elderly and child residents.

135-2 3. Disproportionate noise impacts to The Cannery neighborhood. From a review of the Draft EIR, it is clear that the most significant increase in traffic noise due to the Village Farms development will be experienced within The Cannery, due to the disproportionately large increase in anticipate traffic volumes on Cannery neighborhood streets. The developers and our City leaders should justify why such a large increase in traffic and noise is justifiable given the planned project's adjacency to major arterial roads including Pole Line Road and East Covell Boulevard, and L Street, a secondary arterial road.

135-3 4. Potential flooding impacts to other areas of North Davis by developing and paving over a flood plain. As reported in the Davis Enterprise, this could significantly increase insurance costs for Davis families and also impact potential state assistance should a flooding event occur.

135-4 For the reasons above, I urge our City leaders to rethink the proposal and to incorporate the wellbeing and safety of The Cannery community into any analysis on the topic.

Thank you,
Kayla Timmons Chao

Sent from my iPhone

LETTER 135: KAYLA TIMMONS CHAO

Response to Comment 135-1
Please see Master Response 5 and Response to Comment 17-6.

Response to Comment 135-2
Please see Response to Comment 17-8.

Response to Comment 135-3
Please see Master Response 4.

Response to Comment 135-4
Please see Master Response 1.

Dear City of Davis

I applaud the Developer's apparent intent to pursue the biological resource alternative, preserving the rare alkali vernal pool habitat for future generations and creating a unique green space for the people of Davis to enjoy. However, preservation is just the first step to ensuring this preserve can be a beautiful green space village farms and Davis residents can enjoy and a place where biodiversity is preserved into the future.

(1). Preserve Design - Maximize public viewing opportunities while minimizing disturbance

136-1

An ideal nature preserve protects natural areas while also allowing the public to appreciate and learn from them. The playa pool area attracts significant bird life in the winter months when it fills with water, providing great viewing opportunities for birdwatchers. Unlike other urban ponds in Davis, the lack of trees in the alkali area allows it to support species that prefer open habitats like black-necked stilt, American avocets, western meadowlarks, and Swainson's hawks. However, unrestricted access to the pool area by humans or pet dogs could pose a risk to these birds. Therefore, the preserve should follow the example of West Davis and Julia Partansky ponds, creating bird viewing areas along the fringes of the site but preventing access to the pond area during winter.Limited, guided educational access can be provided to view rare species on specific days and after the pool dries down, as addressed in point **(3)**

(2). Stewardship

136-2

Preservation alone is not enough to protect these fragile landscapes. To preserve the biodiversity at the site, funding and other resources should be committed to a long-term management plan, and a defined organization should be tasked with maintaining long-term management. Many urban vernal pools have been left to languish, ignored and unmanaged, behind a chain link fence as the biodiversity that makes them special slowly blinks out. Sacramento Valley habitats, including this one, suffer from a myriad of invasive species and anthropogenic nitrogen deposition from exhaust, which allows plants like Italian ryegrass (*Festuca perennis*) to crowd out native vegetation. Without disturbance, this invader will choke out the rare plants at this site and create fire risk as thatch(dead dry matter) builds up. Its ability to utilize large amounts of water may reduce water availability for waterfowl as well.

Thankfully, preserve managers in ecologically similar landscapes to the north Davis pool have performed extensive research on how to manage these landscapes. Managers who have worked at Woodland Regional Park, Sacramento National Wildlife Refuge, or the Yolo Bypass are good resources for coming up with management information. At this site, disturbance and invasive species control can be achieved through well-timed mowing, or if the infrastructure allows it, cattle grazing. Preserve design should ensure a vehicle access area to allow management tools like mowers or livestock to be unloaded and offloaded. Finally, responsibility for management should be clearly assigned, and a group capable of conducting long term management should be sought out. Until this occurs, which should be a high priority for the city, the property owner should maintain any mowing regimes they have been doing, making sure to avoid the April-July flowering period for taller alkali species like *Extriplex joaquiniana*.

(3). Educational Opportunities

136-3 The preserved alkali vernal pool would represent the most accessible representation of this habitat type in the area for Davis residents, and therefore an incredible resource to learn about the natural communities that once covered our area prior to agricultural conversion. Guided tours of these sites by knowledgeable individuals would maximize educational value and minimize unintentional disturbance of the site by visitors. Similar programs can be found at Jepson Prairie south of Dixon. The preserve could also serve as a hub for research. There are many researchers who study California grasslands and vernal pools at UC Davis, and having a local example to study would be a great accessible research site. Undergraduate ecology, botany, or land management courses could also visit the site for field trips. ENH 160, Restoration Ecology, an undergraduate course, visits a different restoration site every spring, and students learn surveying methods and write up a comprehensive restoration management plan at the end of course. Collaborating with this course may be a great opportunity to collaborate with the university and educate students about their local ecology, and create an initial management plan for the site. The course visited the nearby Grasslands Regional Park in spring 2010, and produced a report that I have linked below:

https://eviner.faculty.ucdavis.edu/wp-content/uploads/sites/503/2018/05/2010_vernal-pools.pdf

(4) Conclusions

136-4 Pursuing the biological resources alternative, and preserving the 47.1 acre alkali vernal pool, represents the best option for rare Sacramento valley species and for the people of Davis. The preserve would be a green space to learn about and appreciate what makes the valley an ecologically unique landscape, and represent a great birdwatching location. To ensure this site maintains its biodiversity and lives up to its potential - careful preserve design and a stewardship plan are necessary. Finally, collaboration with educational institutions and a public education program will ensure this space is one that brings the community together to learn about the rare habitats that once covered Davis and the western Central Valley only a few generations ago.

Best,

Kees Hood
Former UC Davis student

LETTER 136: KEES HOOD

Response to Comment 136-1
Please see Master Responses 1 and 7.

Response to Comment 136-2
Please see Master Response 7.

Response to Comment 136-3
Please see Master Response 1.

Response to Comment 136-4
Please see Master Response 1.

Letter 137

Dara Dungworth

From: Keirsten Taillon <keirtaillon@gmail.com>
Sent: Tuesday, February 25, 2025 4:42 PM
To: Dara Dungworth
Subject: Village Farms Public Comment / Feedback

Categories: VFD Comment

CAUTION: **External email. Please verify sender before opening attachments or clicking on links.**

Dear Ms. Dungworth,

137-1 I am writing as a concerned homeowner in The Cannery neighborhood to express my strong opposition to the Village Farms development proposal as outlined in the Draft Environmental Impact Report (DEIR). After reviewing the DEIR and related discussions, I believe this project presents significant and unacceptable challenges that will negatively impact my quality of life and that of my neighbors.
The Village Farms development, as currently proposed, will create serious and disproportionate burdens on The Cannery, including:

1. Material and Adverse Alteration to The Cannery Urban Farm
The DEIR claims that the Village Farms project "would not result in modifications to the existing Urban Agriculture Transition Area (UATA)." However, the proposal includes constructing a paved road through the UATA and the Cannery Urban Farm, fundamentally altering and disrupting this space.

137-2 The Cannery Urban Farm was designed and advertised as an essential feature of our neighborhood—a cornerstone of the farm-to-fork concept that attracted many of us to purchase homes here. Both the City of Davis and the original Cannery developers promoted the farm as a key amenity, intended to provide open space, educational opportunities, and a direct connection to sustainable urban agriculture. Now, rather than expanding or integrating The Cannery Farm with the proposed Village Farms educational farm concept, this plan would instead pave over part of it. This directly contradicts the values and promises that shaped The Cannery's original vision.

2. Unacceptable Traffic Safety Impacts
The Cannery community will suffer disproportionate traffic safety impacts from the planned Village Farms development and the planned linkage of Village Farms with the Cannery via the unacceptable, material, and adverse alteration of the Cannery UATA and Cannery Urban Farm. While traffic congestion and level of service is outside the scope of the EIR process, it is nonetheless obvious to any astute local observer that the current and anticipated future design geometry

137-3 of the intersection of East Covell Boulevard and L Street is, and would in all likelihood remain, inadequate to handle the volume of vehicle trips exiting Village Farms during peak morning hours and returning to Village Farms during peak afternoon and evening hours. If a road is built through The Cannery Urban Farm, I expect that a substantial majority of vehicle trips between Village Farms and destinations to the west (including U.C. Davis, and destinations accessible via Highway 113 and 1-80 West) will instead travel through Cannery neighborhood streets, creating significant and unacceptable traffic safety impacts for Cannery residents, notably for the many children and elderly residents of the neighborhood.

137-4 Unfortunately, the traffic study conducted by Fehr & Peers for Raney does little to reflect the truly grossly disproportionate traffic safety impacts which would be suffered by The Cannery due to a linkage to Village Farms. For insight here, I must instead turn to the noise study conducted by Saxelby Acoustics, which is in turn informed by a study made by the project traffic engineer, GHD Group. Unfortunately, GHD's detailed estimates of traffic volumes have not been made public as part of the EIR process.

1

Letter 137 Cont.

137-4 Cont. Per Saxelby, GHD estimates that the portion of Cannery Loop west of Cannery Avenue currently carries 970 average daily trips, and expects that the Village Farms project will more than double average daily trips to 2,000; on a cumulative plus project basis, GHD expects that average daily trips along the southern edge of Cannery Loop would approximately quadruple over time to 4,200, roughly equivalent to the level of vehicular traffic currently seen on secondary arterial roads such as L Street and J Street. Based on the sheer scale of the Village Farms development plan and Fehr's estimates of total trip volumes from Village Farms, I believe that total trips exiting the Cannery during peak morning and afternoon/evening periods via Market Street and Cannery Avenue could increase by anywhere from 200% to 400% immediately following the development of Village Farms, without consideration of further cumulative development impacts over time. Additionally, I note that while Raney concluded that "Higher Number of Units - Same Footprint" (HNU) alternative would result in lower VMT per capita, Raney appears not to have subjected the HNU alternative to a rigorous analysis of total VMT or vehicle trips. While automobile modal share would likely decline under the HNU alternative, I believe that traffic safety impacts to the Cannery could be even greater under this alternative.

137-5 My concern is not solely with potential increases in traffic congestion of potential changes in the level of service. Instead, our concern is that the introduction of a step change increase in commuter traffic volumes to neighborhood streets presents an unacceptable
risk to resident safety. Our concerns are heightened by the already significant traffic safety issues presented by the design of the Cannery, including inadequate traffic calming infrastructure and the very serious risks presented by the southwest Cannery Loop elbow. While I applaud the proposed mitigation at the southwest Cannery Loop elbow, I believe this crossing will remain intrinsically dangerous for bicyclists and pedestrians, and that Village Farms bicyclists should be encouraged to utilize safer routes, including the path immediately north of East Covell Boulevard, and the proposed linkage to the Cannery bike path at the northeast corner of The Cannery.

137-6 3. Disproportionate Noise Impacts
From the review of the Draft EIR, it is clear that the most significant increase in traffic noise due to the Village Farms development will be experienced within The Cannery, due to the disproportionately large increase in anticipate traffic volumes on Cannery neighborhood streets. The developers and our City leaders should justify why such a large increase in traffic and noise is justifiable given the planned project's adjacency to major arterial roads including Pole Line Road and East Covell Boulevard, and L Street, a secondary arterial road.
While I defer to the expertise of Saxelby Acoustics, I note that their analysis relies heavily on estimates produced by the project's traffic engineer, GHD Group. In the interests of transparency, the City should seek to include any traffic plan, study or analysis created by GHD as part of the public EIR process.

137-7 4. Flooding Risks and Environmental Concerns
The Village Farms site encompasses a substantial 200-acre floodplain, posing significant flooding risks. Developing in such an area not only endangers future residents but also raises concerns about water management and environmental sustainability. The DEIR does not adequately address these risks or propose sufficient mitigation measures.
Moreover, the site has a history of toxic contamination, which could pose health hazards to both construction workers and future inhabitants. The DEIR lacks a comprehensive plan for site remediation, leaving the community vulnerable to potential exposure.

137-8 As outlined above, I believe there are significant flaws in the Village Farms development proposal, and for that reason oppose it in its current state.

Sincerely,
Keirsten Taillon
keirtaillon@gmail.com
Heirloom Street
Davis, CA 95616

LETTER 137: KEIRSTEN TAILLON

Response to Comment 137-1
Please see Master Response 1.

Response to Comment 137-2
Please see Response to Comment 17-3.

Response to Comment 137-3
Please see Response to Comment 17-4.

Response to Comment 137-4
Please see Responses to Comments 17-5 and 17-6.

Response to Comment 137-5
Please see Response to Comment 17-7.

Response to Comment 137-6
Please see Responses to Comments 17-8 and 17-9.

Response to Comment 137-7
Please see Master Responses 3 and 4.

Response to Comment 137-8
Please see Master Response 1.

Letter 138

Dara Dungworth

From: Ken Holt <nevadaken@hotmail.com>
Sent: Tuesday, February 25, 2025 4:37 AM
To: Dara Dungworth
Subject: Village Farms.

Categories: VFD Comment

CAUTION: **External email. Please verify sender before opening attachments or clicking on links.**

138-1 I wasn't able to make it to the meeting about Village Farms so I don't know about all the possible impacts. But I know that I'm already stuck in traffic when I drive through town and we have not updated our infrastructure enough for the number of residents we already have. Each time we over expand, the quality of life for those of us who live here already goes down a little. I moved to Davis in 1982 and have seen a lot of change. I don't think I like this change.

Sent from my Verizon, Samsung Galaxy smartphone
Get Outlook for Android

LETTER 138: KEN HOLT

Response to Comment 138-1

Please see Master Responses 1 and 5.

Letter 139

Dara Dungworth

From: Kirstin Adams-Bimson <adams.kirstin@gmail.com>
Sent: Tuesday, February 25, 2025 4:15 PM
To: Dara Dungworth
Subject: Comments and concerns regarding "Village Farms" development

Categories: VFD Comment

CAUTION: **External email. Please verify sender before opening attachments or clicking on links.**

I am a resident of Davis residing in the La Buena Vida condo complex in the Wildhorse area and am *staunchly* against the Village Farms development. I became aware of and began looking into the development late last year. The more I have learned about it, the more I have uncovered its staggering flaws and compounding issues. I am blown away by the self-interested audacity of this plan, the countless harms it could cause, and the manner in which so many of its problems are, by design, foisted upon neighboring communities, the City, and the taxpayer. I am all for more accessible, well-designed housing--*especially* affordable housing. But the Village Farms plan, in its current form, is nothing short of a disaster for everyone involved.

139-1

I have outlined my concerns and the numerous problems as I see them below. I could foresee an alternate development plan for that area, significantly smaller in scale and scope and utilizing only the southern 1/4 of the land currently allocated for Village Farms, perhaps working well--with thoughtful design, careful planning, and significant environmental considerations. However that is not what Village Farms seeks to create, nor is it my understanding that is a compromise the developer seems willing to make. I am happy to speak with you or anyone else regarding my concerns, and sincerely hope the city council exercises its full authority to see that each of these problems is appropriately addressed with the developer before the project is permitted to proceed (if at all).

SEVERE TRAFFIC CONGESTION ON COVELL AND POLELINE

Existing traffic congestion: As a resident in the La Buena Vida community, I see the traffic impacts along Covell and Poleline on a daily basis. As it stands currently the congestion along these two major city thoroughfares during the after-work crush is significant and, at times, dangerous. Turning out of Oak Tree Plaza onto Covell between 3pm-6pm on weekdays can take several minutes, with a line 5 or more cards behind me in the parking lot, further congesting traffic in the plaza itself. The same is true of turning out of Donner onto Poleline. It has in the past taken me upwards of five minutes to safely turn left onto Poleline. These are exacting numbers, not exaggerations--I have timed the delay, and been late to work on multiple occasions due not only to the heavy flow of vehicle traffic, but the addition of multiple street lights within close proximity of each other along Covell Blvd over the years (J street, L street) which, while improving the safety of intersections, serves to further delay vehicle traffic traveling along the road.

139-2

Flaws of VMT: Using Vehicle Miles Traveled (VMT) as the sole measure of roadway usage to determine traffic in this area is not simply misleading but blatantly disingenuous. VMT provides only one piece of a larger picture of roadway usage which, in this particular situation, provides a very small part of the picture. As any resident in the area can tell you, this intersection sees regular, predictable daily spikes in traffic, due not only to the time-of-day and arterial nature of these roads, but due to the nature of the businesses present at Oak Tree Plaza. Nugget Market, CVS, Travis Credit Union, and Pink Dozen Donuts are staples and anchor stores of this plaza, and are all common before and after work stop-offs, which encourages increased traffic at specific periods of the day. It is not simply the volume of vehicles utilizing the road in total, but the how and when that creates the clearest picture of traffic impacts, congestion, and pedestrian safety. These roads are, as they now stand, at capacity--they cannot take any significant increases in use and maintain safe and effective function.

139-3

139-4 **Few roadway alternatives:** Covell Blvd and Poleline road are essential arterial roadways for both the City of Davis and the City of Woodland. There exists no other east-west roadway in Davis which can serve as a reasonable alternative to Covell Blvd for drivers: 2nd Street provides only one lane each way, with limited expedient access to other parts of the city through which it passes, serving primarily as a conduit for travel between Covell Blvd near Interstate 80, and Downtown Davis. 5th Street/Russell has frequent stops and experiences regular congestion as it passes through Downtown and Central Davis toward the west, and narrows into one lane each way once it crosses Poleline to the east, with lower speeds and additional frequent stops as it passes through residential neighborhoods. It also sees limited expedient access to other parts of the city through which it passes, relying on its crossing with Poleline, F St, Anderson, and Lake Blvd to connect it to the more efficient thoroughfare of Covell Blvd.

139-5 **Insufficient public transit alternatives:** The existing public transit options (Unitrans and Yolo Bus) available in the city are insufficient to serve community needs, inefficient, and slow as a mode of transport. The most widely available public transit option, Unitrans--a service run by the ASUCD, is structured to primarily serve the student population and not permanent residents of the city. The service's transit hub is based not on city property but on the UC Davis Campus, and routed destinations focused on serving student apartment hubs and other essential services and businesses used heavily by students. That Unitrans can provide some utility to permanent residents and families is incidental, not by design; and that is precisely the population Village Farms aims to target--permanent residents and families, the groups least likely to make use of Unitrans. Yolo Bus, by contrast, provides only a few stops within City limits, largely aimed at providing intercity transit and not transit within the city itself.

139-6 **Unsafe transit alternatives:** Facing congested vehicle traffic and a lack of public transit options, and with so many greenbelt and walking path options throughout the city, it is reasonable to assume pedestrian and cyclist traffic will increase in the area. Without the inclusion of a grade-separated crossing--noted as likely 'infeasible' across both Poleline and Covell due to existing infrastructural limitations, an increase in pedestrian injury and fatality is statistically likely. Per CDC research, among 60 roads that had the most pedestrian deaths during 2001-2016, all were roads with adjacent commercial retail space, nearly all were multilane roads, and more than three-quarters had speed limits of 30 miles per hour or higher--all factors which pertain to the stretch of Covell Blvd along the proposed development site. Increasing housing here--especially housing catering to families with children, will bring more people to dangerous roads poorly catered to safety and transit needs.

139-7 **Environmental risks:** Vehicle congestion poses many hazards, including increased carbon emissions and particulate matter released into the air, and deteriorating air quality. This is a particular concern considering the proximity of a proposed public park and child care center to the source of vehicle emissions, as well as the proximity of homes targeted at young families. Moreover, the longer a vehicle idles or sits in traffic, the longer it is on the road overall, and the more emissions are released into the air in aggregate. The matter of traffic and roadway usage is a compounding problem.

SIGNIFICANT ENVIRONMENTAL RISKS AND DAMAGES

139-8 **Severe flooding risks:** Over half of the proposed site of development is an established 200-acre flood plain categorized as a FEMA Zone A High Risk Special Flood Hazard Area (SFHA). This designation, already a tremendous risk on its own, is based on the existing history of regional flooding and historical data sets. It does not reflect the projected risk increases anticipated by experts due to climate change, one of which is the increasing desertification of the Central Valley. Oscillations between long periods of drought and periods of intensive rain have been and are expected to grow increasingly severe. Such weather patterns create the most dangerous conditions for flooding and mudslides, decreasing soil permeability and subsequently its ability to absorb rainfall. That is to say nothing of the impact development--sidewalks, roadways, buildings, and other soild barriers--has on the land's ability to absorb rainfall.

139-9 Additionally, throughout the Central valley over the past decade we have seen aquifers drain and collapse, causing significant sinking and settling within the valley such that it has made national headlines. Without those aquifers, there is yet further reduced capacity for rainfall to be absorbed by the environment throughout the region, increasing flooding risk and the need for additional and more advanced water management systems. Davis cannot simply narrow its

139-9 Cont. assessment to the immediate region of development, it must also consider the broader impact of climate change on the surrounding area and how changes to the proposed development site fits into that picture.

139-10 **Destruction of nearly 1,000 mature trees:** The project proposes to remove 952 existing mature trees throughout the development site. These trees currently provide important environmental benefits, and it will take many years--as much as decades--for new trees planted as part of Village Farms to grow to a maturity and attain the same environmental impact and benefit the present trees provide: air purification, erosion protection, and flood risk reduction, among others. In the interim, the floodplain will be left without vital protections, and the habitats of dozens of animal species will be destroyed, including endangered species and species of special concern native to the region which utilize the fields and Channel A wildlife area as a habitat.

139-11 **Sensitive ecological areas inadequately protected:** Vernal pools exist on the development site - an ecologically vital and incredibly sensitive endangered wetland habitat protected by both state and federal laws. The state is taking active efforts to revitalize California's vernal pools, as we have lost the vast majority of vernal pools over centuries due to agricultural and urban expansion. Per California Fish and Game: "Estimates suggest that close to 90 percent or more of the vernal pool habitat in the Central Valley and in other parts of the state has been lost. Recent studies have documented continuing vernal pool habitat loss in recent decades, with over 13 percent of the remaining Central Valley vernal pool habitat (137,100 acres) being lost from baseline conditions in 1976-1995 to the conditions in 2005. Agriculture and development have also altered the hydrology of land surrounding vernal pools, increasing erosion and runoff and contributing harmful pesticides and fertilizers."

Vernal pools are home to dozens of species of animal and plant life endemic to vernal pools, also protected by state and federal laws, including the vernal pool tadpole shrimp (a species home to the Sacramento Valley specifically--the location of this site constitutes "ground zero" for this species' eroding habitat), and rare native plant species including the alkali milk metch (Astragalus tener var. tener) and the San Joaquin spearscale (Extriplex joaquinana). Vernal pools are wetland habitats, and wetland habitats are defined by their delicate relationship with the water table and runoff--all things proposed to be significantly altered by Village Farms. Alteration to nearby hydrology is one of the top three factors responsible for the destruction of vernal pools. Scientific understanding and historical examples both indicate that development on this site and alterations to its existing hydrology--even if the immediate area surrounding the vernal pools is left untouched--is likely to significantly endanger if not outright destroy those vernal pools. It will take a far more involved effort in hydrological and environmental study than the developer has thus far engaged in to determine whether development on this site can adhere to existing protections to preserve this sensitive habitat.

139-12 **Dangerous toxins present at development site:** The potential for adverse health effects caused by toxins present at the proposed development site is nothing short of staggering. Toxins present and recorded in excess of safe limits, many seeping from the unlined old city landfill to the north, include:

- Arsenic

  Chronic exposure can lead to heart disease and cancer.

- PFAs or "forever chemicals"

  Chronic exposure can lead to high cholesterol, ulcerative colitis, thyroid disease, testicular cancer, liver damage, kidney cancer, male infertility and low sperm count, developmental effects in unborn children, reduced response to vaccines, low birth weight, breast cancer, obesity, and increased miscarriage risk.

- Toxaphene

  Exposure can lead to damage to the kidneys, lungs, and central nervous sytem, can cause seizures and respiratory failure as a result of seizures, and cause cancer.

- High lead levels

139-13 *Research has shown there to be no safe level of lead exposure. Lead can cross the blood-brain barrier and casue extensive damage to all systems of the body and internal organs, with particularly significant impacts on the physiological and cognitive development in children.*

Moreover, the developer seeks to utilize on-site soil contaminated with these toxins to level and develop Village Farms as far south as the proposed placement of Heritage Park along Covell, placing those toxins within immediate reach and effect of countless individuals, including many vulnerable groups: children, pregnant women, the elderly. Additionally, endangered and at-risk bird species which travel the flyway are likely to be drawn to the plan's ponds, parks, nature **139-14** preserves, and drainage channels, which are estimated to become further toxified by the proposal to deepen the drainage channels (to accommodate increased rainwater and runoff necessitated by developing on a floodplain) which may draw those toxins from the groundwater into the surface water. This poses yet another risk in carrying those toxins along drainage channels throughout the surrounding area, affecting Wildhorse, La Buena Vida, and ultimately posing a risk to the nearby wetlands and the countless sensitive habitats present there, a mere 6.5 miles away.

FINANCIAL RISKS AND COMMUNITY BURDENS

City liability for flooding: It does not take exceptionally severe flooding to cause extensive and costly damage to **139-15** structures and property. The existing flood risks alone, should the worst come to fruition, would be more than sufficient to cause extensive damage and provide ample grounds for a lawsuit against the city (which has been informed of the presence of the floodplain and its potential risks with regard to this development). That is to say nothing of larger risks posed by historically unprecedented climate disasters caused by climate change.

It's happened before: I have personal experience with the type of waterflow mitigation this development seeks to employ, and can attest that the measures proposed by this project are dramatically insufficient. I grew up in Bianchi Estates in Roseville between 2001-2009, a small rural community along Baseline Road with a natural creek running through half of the properties, meeting with the Dry Creek Walerga Road Tributary several miles to the west. Across Baseline, a housing development (Junction West, part of the Woodcreek Oaks development) was built in 2002, and to accommodate the water runoff caused by the development a drainage basin was built along Baseline Road. The runoff would accumulate there before passing through a drainage tunnel under the road into the creek running through Bianchi Estates. Every winter, without fail, the drainage basin would fill completely and the runoff sent through the Bianchi Estates creek would flood every property it passed through. The degree of flooding and the property damage done was significant. Every winter I and my family spent long nights out in the pouring rain paling and sandbagging to keep water from reaching the house--and this was with the addition of three foot tall berms separating the creek from the home, and a gravel drainage trough behind it with automatic water pumps to reroute water away from the house.

139-16 Problems often compounded: Storms caused power outages which made the pumps inoperable, causing rainwater buildup behind the berms. When sections up-creek accumulated debris, or if debris accumulated within the drainage basin across Baseline, it would often cause blockages on properties worsening the flooding. The floodwaters--often extending 20-60 feet beyond the bounds of the creek bed--would damage lawn and landscaping, cause rotting at the base of fence posts, and weaken the soil around tree roots making them more susceptible to uprooting in seasonal winter winds. On several occasions both young and mature trees were uprooted due to soggy soil and strong winds, amounting to thousands of dollars in damages and losses. While my parents did not actively pursue a lawsuit against the City of Roseville, it was common conversation among residents within the neighborhood angry at the development choices of Junction West which offloaded its problems onto existing adjacent properties, ultimately solving none of them.

It is important to note that Bianchi Estates and Junction West are not developments positioned on any kind of floodplain. The land upon which these neighborhoods were built was otherwise prime development land. Moreover, these floods and flood-related problems occurred a decade before significant changes to weather patterns due to climate change were recorded in the area. Like Village Farms, Junction West did the bare minimum required to assess

139-16 Cont. environmental risk factors and suitability, and like Village Farms, Junction West significantly underestimated the impacts of the development on local hydrology. However, unlike Junction West, Village Farms seeks to develop on land far, far riskier, at a time when environmental factors are dramatically more extreme and significantly less predictable.

City liability for toxins: The city may also find itself liable for copious toxins that will be present on the development site, and the countless ways those toxins could affect both the permanent residents of Village Farms and visitors to the many public spaces the development seeks to add to the city. The ways in which these toxins may reach people, despite any mitigation efforts taken, number in the dozens: absorbed through direct contact with contaminated water or soil; inhaled when, in the summer months, dry soil becomes airborne dust; absorbed by vegetable gardens or fruit trees homeowners seeks to grow either for personal enjoyment or to combat rising food prices, and ingested directly.

139-17 The toxins present are among some of the most dangerous to the healthy and functional development children, both physically and cognitively. The illnesses these toxins can cause are the kind that bankrupt families when they do not instead simply cause devastating cancers or untimely deaths. Knowingly building on such toxic ground is more than sufficient cause for a lawsuit against the city when those toxins inevitably affect families--and is a type of lawsuit well within historical precedent for litigants to win.

Increased costs to homebuyers: Due to the presence of a Zone A floodplain, flood insurance mandates by mortgage companies will increase the cost of purchasing and maintaining properties on the proposed development site significantly. It is well established both within the city and the state of California that we are experiencing not simply a housing crisis but an affordable housing crisis.

139-18

Needless and large-scale risks: Under the second Trump administration the US economy has suffered massive blows in only a few short weeks: the firing of 200,000+ federal employees, staggering cuts to federal expenditures, and a level of political instability the likes of which our country has never before seen and which further threatens the fiscal security of the nation. That is to say nothing of the private sector in the past six months alone: 20,000+ jobs lost among nationwide employers, stagnating wages, and the permanent replacement of workers with AI and other automated technologies. These are blows which will and already are reverberating throughout the nation, throughout California, and throughout Davis. Good jobs grow scarcer, the cost of living is skyrocketing, resources are diminishing, and more and more people find themselves without work. These are large, complex, foundational problems that will not be solved anytime in the near future. This is the absolute last time the City of Davis should be considering large-scale projects with so many unadulterated risks and needless costs, not only to the city but the prospective home buyer the project is allegedly intended to help.

139-19

--
Kirstin Adams-Bimson
adams.kirstin@gmail.com
(530) 574-7754

LETTER 139: KIRSTIN ADAMS-BIMSON

Response to Comment 139-1
Please see Master Response 1.

Response to Comment 139-2
Please see Master Response 5.

Response to Comment 139-3
Please see Master Response 5.

Response to Comment 139-4
Please see Master Response 1.

Response to Comment 139-5
Please see Master Response 1. Potential impacts related to transit facilities are discussed under Impact 4.13-3 within the Draft EIR.

Response to Comment 139-6
Please see Master Responses 5 and 6.

Response to Comment 139-7
Please see Response to Comment 47-1.

Response to Comment 139-8
Please see Master Response 4.

Response to Comment 139-9
Please see Master Response 1. The Draft EIR evaluated potential impacts related to groundwater recharge under Impact 4.8-3 within Chapter 4.8, Hydrology and Water Quality, of the Draft EIR.

Response to Comment 139-10
Please see Master Response 7.

Response to Comment 139-11
Please see Master Response 7.

Response to Comment 139-12
Please see Master Response 3.

Response to Comment 139-13
Please see Master Response 3.

Response to Comment 139-14
Please see Master Response 3.

Response to Comment 139-15
Please see Master Response 4.

Response to Comment 139-16
Please see Master Responses 1 and 4.

Response to Comment 139-17
Please see Master Response 3.

Response to Comment 139-18
Please see Master Response 1.

Response to Comment 139-19
Please see Master Response 1.

Letter 140

Kyle Elshoff, Junior Specialist
861 Lake Terrace Circle
Davis, CA 95616
(661) 877-5671
kcelshoff@ucdavis.edu

Dara Dungworth, Principal Planner
City of Davis Department of Community Development
23 Russell Boulevard, Suite 2
Davis, CA 95616
ddungworth@cityofdavis.org

Re: Comment in Support of BRPA for Village Farms Davis Project Based on DEIR (SCH #2023110006)

To Dara Dungworth,

My name is Kyle Elshoff, and I live in West Davis and work at UC Davis in the Department of Evolution and Ecology. I strongly support the proposed Biological Resource Preservation Alternative (BRPA) over the original Village Farms Davis Proposed Project because it will provide 1,800 homes to supplement the City's housing supply (equal to the original Proposed Project) and at the same time conserve 47.1 acres of rare Alkali Playa and Alkali Wetland habitat, protect a federally-listed endangered and other threatened species, and provide environmental stewardship and engagement opportunities to the local community.

140-1

Chapter 4.4 (Biological Resources) of the Village Farms Davis Project DEIR makes it clear that the BRPA is the best development option. It will explicitly conserve 47.1 acres of Alkali Playa and Wetland habitat and avoid or diminish many of the significant and unavoidable biological impacts of the original Proposed Project. Under the BRPA, the federally endangered Vernal Pool Tadpole Shrimp (*Lepidurus packardi*), rare plants like Alkali Milkvetch (*Astragalus tener* var. *tener*) and San Joaquin Spearscale (*Extriplex joaquinana*), and the state-listed Swainson's Hawk (*Buteo swainsoni*) will continue to thrive and provide valuable biological services to the ecosystem and to City residents. Lastly and though not explicitly addressed in the BRPA Project Description, it is my hope that the conserved habitat will be **stewarded with scientifically sound grassland management practices such as grazing or mowing** and will be **accessible to the local community through wildlife viewing areas**. Stewardship and wildlife viewing areas will enhance and showcase the area's biological resources (Marty, 2015) and actively engage the local community with their environment. Clearly, the BRPA meets the needs of Davis's human population and those of our non-human neighbors and is the ideal outcome of the Village Farms Davis Project.

Lastly, it is notable that the BRPA's conserved natural habitat area contains unique and threatened wetland systems known as vernal pools, 90% of which have been lost in recent history due to human habitat alteration (Gordon et al., 2012). In my view, the Village Farms Davis Project presents an opportunity to buck this unfortunate historical trend, and the BRPA is the clear way to achieve it. I strongly support implementing the Biological Resource Preservation Alternative for the Village Farms Davis Project.

Sincerely,

Kyle Elshoff
B.A. Evolution, Ecology, and Biodiversity, UC Davis
Junior Specialist, Department of Evolution and Ecology, UC Davis
Certified UC California Naturalist

References:

Gordon, S.P., Sloop, C.M., Davis, H.G. et al. (2012). Population genetic diversity and structure of two rare vernal pool grasses in central California. *Conserv. Genet. 13*, 117–130. https://doi.org/10.1007/s10592-011-0269-y

Marty, J.T. (2015), Loss of biodiversity and hydrologic function in seasonal wetlands persists over 10 years of livestock grazing removal. *Restor. Ecol., 23*: 548-554. https://doi.org/10.1111/rec.12226

LETTER 140: KYLE ELSHOFF

Response to Comment 140-1

Please see Master Response 1.

Letter 141

Dara Dungworth

From: Larry Dicke <lawrence.dicke@sbcglobal.net>
Sent: Monday, January 13, 2025 10:57 AM
To: Dara Dungworth
Cc: City Council Members
Subject: Village Farms Davis Project

CAUTION: **External email. Please verify sender before opening attachments or clicking on links.**

Dear Dara,

141-1 I will review the Draft EIR in detail and provide comments. That said, the City of Davis should be focused on timely maintenance of the current greenbelt and parks, not adding parcels that will not be maintained in the future.

Regards,

Larry Dicke

1

LETTER 141: LARRY DICKE

Response to Comment 141-1

Please see Master Response 1.

Letter 142

Dara Dungworth

From: Larry Strozyk <larrystrozyk@alohabroadband.com>
Sent: Monday, February 24, 2025 9:18 PM
To: Dara Dungworth
Subject: Opposition to Village Farms Project

Categories: VFD Comment

CAUTION: External email. Please verify sender before opening attachments or clicking on links.

Hello,

142-1 I am writing to you today to express my deep concern over the Village Farms Development being built on a flood plain and on land that is poisoned with pfafs and other chemicals. It is a terrible idea that a housing development this size on land that will make people sick would even be considered. Keep in mind the greenhouse emissions that would be caused from all of the traffic that a development of this size would create. The Village Farms Development should not be allowed.

Larry Strozyk
Sent from my iPhone

LETTER 142: LARRY STROZYK

Response to Comment 142-1

Please see Master Responses 1, 3 and 4, as well as Response to Comment 47-1.

Letter 143

February 23, 2025

To whom it may concern:

I am writing to express some of my concerns about the proposed Village Farms housing project. I understand that there is a need for more housing in Davis, but I would like to urge the Commission and Council to consider alternative visions for this project that would lessen some of the serious issues associated with the proposed plan.

143-1 **How much new housing do we actually need?** One reason that has been given for voters to support new housing in Davis is that since the city is apparently not in compliance with state law regarding the number of new housing units that are needed, the state will make the decisions for us. Yet, according to the 2021-2029 Housing Element update* the city of Davis has a "Regional Housing Needs Allocation" of 2075 housing units for the 2021-2029 cycle, of which over half must be low to moderate income units. However, the current list of proposed Davis housing projects, which includes Village Farms, along with recently approved developments, would provide much more than what the state seems to require. This suggests that we do not really need over 1800 new units in Village Farms.

143-2 **Flood plain**:At least some of the area under consideration for Village Farms is part of the floodplain that protects much of north Davis from major flooding. Water that would now be absorbed by the open land, would have to go elsewhere, and it is not clear where that would be. Climate change is increasing the probability that there will be major flooding in our area in the future, and we need to plan ahead in order to mitigate the risk of such an event. Paving over much of the existing floodplain would exacerbate, rather than mitigate, this problem.

143-3 **Traffic**:There is little doubt that building over 1800 new homes on the proposed site will have major impacts on traffic. Since many of the homes in Village Farms would be relatively far from campus, downtown, shopping etc. there is little doubt that automobile traffic will increase dramatically. The presence of the railroad tracks on the west side of the property means that all traffic must enter and exit via Covell or Pole Line Roads, and the traffic impact on these streets would be significant. We also need to consider how this additional traffic will impact the safety of cyclists who use these routes to get to campus, school, and downtown. The proposed Shriners project would also add automobile and bicycle traffic along the Covell corridor, which makes this matter even more urgent.

143-4 **Transit:** Despite the obvious impact of this project on traffic, there seems to be no attempt to encourage the use of public transit, (In contrast, one of the objectives of the Shriners project is to facilitate the use of public transit by residents and visitors.) This is not a climate friendly proposal.

143-5 **Vernal Pools**: I was pleased to see that the developers submitted a modified plan that would avoid disturbing the existing vernal pools. According to the California Fish and Wildlife Department, over 90% of the vernal pool wetlands in California have been lost due to agriculture and urban development. These areas support unique plant and animal species and are now protected by state law. At times, the vernal pools in the proposed Village Farms area have hosted hundreds of water birds, including a variety of species. I strongly support the modified plan.

143-6 In sum, it seems that going ahead with the full Village Farms project at this time is ill advised, and instead I think that it would make more sense for the city to approve a much more limited project to see what the impact is on the environment and on traffic.

Thank you for your consideration

Laura Eisen,
1013 Pierce Lane, Davis
eisenlaurap@gmail.com

* https://www.cityofdavis.org/city-hall/community-development-and-sustainability/planning-and-zoning/housing-element-rezone-sites

LETTER 143: LAURA EISEN

Response to Comment 143-1
Please see Master Response 1.

Response to Comment 143-2
Please see Master Response 4.

Response to Comment 143-3
Please see Master Response 5.

Response to Comment 143-4
Please see Response to Comment 113-5.

Response to Comment 143-5
The comment expresses support of the BRPA. Please see Master Response 1.

Response to Comment 143-6
Please see Master Response 1.

Letter 144

Dara Dungworth

From: Lawrence Shweky <lshweky@yahoo.com>
Sent: Thursday, February 20, 2025 8:09 AM
To: Dara Dungworth
Cc: hoa@boschkenproperties.com; Maria DeSousa; Val Sheehan
Subject: Village Homes and Cannery

Categories: VFD Comment

CAUTION: **External email. Please verify sender before opening attachments or clicking on links.**

144-1 I am generally happy that the City is looking at the Village Homes development as a way of increasing housing in Davis without adding sprawl. However, I am highly upset at the proposal to link the two developments with a road that runs through the Cannery Urban Farm. I am an original homeowner in the Cannery and it was sold to us as a Farm to Fork development with many features that are still unfulfilled. The farm itself never developed in the way that it was supposed to and the Marketplace sits there as an urban eyesore of overgrown weeds. I understand the challenges in developing these spaces, but these are significant aspects of what was supposed to make the

144-2 Cannery a special place. While we have waited patiently for almost a decade for movement on these areas, you now propose to put a road through the farm and use the Cannery as a throughway to J Street. It is wrong on so many levels I can hardly begin to capture it in this email. The Village Homes development is large enough that it can figure out its own problems without encroaching on the Cannery, which has obvious problems of its own. Honestly, it is appalling that you are considering this instead of making good on the promises that were made to Cannery owners many years ago.

Lawrence Shweky
927 Woodbury Lane

1

LETTER 144: LAWRENCE SHWEKY

Response to Comment 144-1
Please see Master Response 1.

Response to Comment 144-2
Please see Master Response 5.

Letter 145

Dara Dungworth

From: Leng Caine <lcaine@msn.com>
Sent: Wednesday, February 12, 2025 10:35 AM
To: Planning Commission
Subject: About village farms

Categories: VFD Comment

CAUTION: External email. Please verify sender before opening attachments or clicking on links.

Dear Planning Commission,

As a Cannery resident, my three primary concerns with the proposed Village Farms project are below:

145-1 1. Disruption/damage to The Cannery Urban Farm. The EIR proposes paving a high-traffic road through the middle of our urban farm in order to connect the highest-density portion of the proposed development to our Cannery traffic circle. As imagined, designed, and built, The Cannery was sold to us as having an urban farm, and it is an essential portion of our community. Allowing such blatant disruption of the farm would run contrary to the concept of the The Cannery homes that our residents bought in to.

145-2 2. Traffic safety concerns related to our already unsafe narrow roads. The EIR study by GHD indicates that the relevant portion of Cannery Loop currently carries 970 average daily trips, and the study expects that the Village Farms project will more than double average daily trips to 2,000; on a cumulative plus project basis, GHD expects that average daily trips along the southern edge of Cannery Loop would approximately quadruple over time to 4,200, roughly equivalent to the level of vehicular traffic currently seen on secondary arterial roads such as L Street and J Street. Based on the sheer scale of the Village Farm, this would create unacceptable safety hazards, especially to our vulnerable elderly and child residents.

145-3 3. Disproportionate noise impacts to The Cannery neighborhood. From a review of the Draft EIR, it is clear that the most significant increase in traffic noise due to the Village Farms development will be experienced within The Cannery, due to the disproportionately large increase in anticipate traffic volumes on Cannery neighborhood streets. The developers and our City leaders should justify why such a large increase in traffic and noise is justifiable given the planned project's adjacency to major arterial roads including Pole Line Road and East Covell Boulevard, and L Street, a secondary arterial road.

For the reasons above, I urge our City leaders to rethink the proposal and to incorporate the wellbeing and safety of The Cannery community into any analysis on the topic.

Leng Caine
a Cannery resident

LETTER 145: LENG CAINE

Response to Comment 145-1
Please see Responses to Comments 17-2 and 17-3.

Response to Comment 145-2
Please see Response to Comment 17-6.

Response to Comment 145-3
Please see Response to Comment 17-8.

Letter 146

Dara Dungworth

From: LES PORTELLO <lpalmond@aol.com>
Sent: Monday, February 24, 2025 12:37 PM
To: Dara Dungworth
Subject: Village farms DEIR

Categories: VFD Comment

CAUTION: External email. Please verify sender before opening attachments or clicking on links.

Sent from my iPhone

I am concerned about the failure of the Village Farms DEIR to consider several issues that are relevant to the health and welfare and financial future of the city and its citizens.

146-1 First is the potential underground hazard from the old Davis dump. This hazard could exhibit as both underground water pollution and surfacing toxic emissions.

146-2 Second is the failure to address the potential of future flooding in the area designated as flood plain.

146-3 Third is the violation of the City's climate change plans and goals for clean air as a result of more vehicle emissions as more vehicles back up on Covell and on Road 102, which already are congested much of the day.

146-4 My forth concern with the DEIR is the failure to consider how the increase in the need for City services will be paid for and the how the projected cost of that demand will affect delivery of heath and welfare services to the rest of the town. Continued growth has impacted the City's urban forest and greenbelt work and road maintenance. Failure to prune city trees has already subjected the City to a multi-million dollar liability from a tree limb fatality at a city park.

Any expansion plans such as Village Farms should include a means of paying for adequate funding of costs associated with that expansion based on a sound analysis of future revenue and costs. I don't see that in the DEIR. History and the present fiscal status of the City indicates this has not been done properly in the past and the DEIR for Village Farms appears to suffer from the same deficiency.

Thank you.

Les Portello
2721 Anza Ave
530-756-0842

LETTER 146: LES PORTELLO

Response to Comment 146-1
Please see Master Response 3.

Response to Comment 146-2
Please see Master Response 4.

Response to Comment 146-3
Please see Response to Comment 47-1 and 11-21.

Response to Comment 146-4
Please see Master Response 1.

Letter 147

Dara Dungworth

From: Leslyn Skog <lesjskog@gmail.com>
Sent: Monday, February 24, 2025 8:25 AM
To: Dara Dungworth
Subject: Village Farms DEIR comments

Categories: VFD Comment

CAUTION: **External email. Please verify sender before opening attachments or clicking on links.**

To whom it may concern (Planning Commision and others);

147-1 I do not believe that the site proposed for 1800 units called "Village Farms" is appropriate for more development. I particularly object to the units north of the Cannery which border the railroad tracks. There will be for those units no vehicle access to the South where homes stand in the way, to the North due to toxics issues, and particularly to the West where the railroad tracks are in the way. Putting more homes in this boxed-in location is just asking for bottlenecked traffic. I do not believe that bus access (poor in Davis unless you want to go to the University) will draw enough of the daily vehicle trips to make a difference. It is simply wishful thinking to believe that many people will travel by bus. The vehicle traffic will add to the already difficult Pole Line/Covell Blvd. intersection's problems. This development is too large for the access problems, and vehicle, bicycle and pedestrian movement will be severely impacted. The developer has not proposed to pay for any access over the railroad tracks, so to me this idea of building more homes bordering the tracks is dead on arrival.

147-2 A second problem is that the houses are too large and expensive for Davis's needs. We are having trouble finding enough children to fill our schools, and already are allowing children to come in from outside of the area that is covered by extra school taxes. We need young families! Smaller and less expensive homes, as well as multi-family units, would be what we need in any development that is approved. My understanding is that we are not currently in need of more housing to fulfill regional requirements. We can afford to take our time and build what we truly need.

147-3 I would like to draw the attention of all city officials to a recent New York Times article that illustrates the difficulty of promising fire engines for the proposed new fire department.

Here is the link:
https://www.nytimes.com/2025/02/17/us/fire-engines-shortage-private-equity.html?smid=url-share

Obviously, the increased costs and years-long wait times for fire engines right now makes this Village Farms Fire Station proposal unlikely to come to fruition. What is far more practical and cost-effective would be for Davis to have an EMT station for medical emergencies. When an elderly woman at my church felt faint and needed to lie down, was a fire truck needed? No, just medical personnel to check her out. Fire trucks should be used only for fires, not for medical emergencies.

Thank you for your attention to these comments.

- Leslyn Skog, 1247 Menlo Drive, Davis, CA 95616

LETTER 147: LESLYN SKOG

Response to Comment 147-1
Please see Master Response 5.

Response to Comment 147-2
Please see Master Response 1.

Response to Comment 147-3
Please see Response to Comment 75-51.

Letter 148

Dara Dungworth

From: Liqin Liu <sunshinewater8@gmail.com>
Sent: Saturday, February 22, 2025 4:00 PM
To: Dara Dungworth
Subject: Concerns Regarding Village Farms Development

Categories: VFD Comment

CAUTION: **External email. Please verify sender before opening attachments or clicking on links.**

Dear Ms. Dungworth,

I am writing to express concerns about the potential impacts of the Village Farms development on our community. Specifically, I am worried about the following:

148-1

1. Significant changes to The Cannery Urban Farm that could alter its character and function.

148-2

2. Traffic safety concerns for residents of The Cannery neighborhood.

148-3

3. Increased noise levels during and after construction that may disproportionately affect our community.

148-4

As our review of the project continues, we reserve the right to raise additional concerns. I appreciate your time and consideration and look forward to further discussions on this matter.

Sincerely,
Liqin Liu

LETTER 148: LIQIN LIU

Response to Comment 148-1
Please see Master Response 5.

Response to Comment 148-2
Please see Master Response 5.

Response to Comment 148-3
Noise increases during project construction and operation are addressed in Chapter 4.10, Noise. Please see Master Response 1.

Response to Comment 148-3
Please see Master Response 1.

Letter 149

Dara Dungworth

From: Elizabeth Reay <ereay58@outlook.com>
Sent: Monday, February 10, 2025 4:43 PM
To: Planning Commission
Subject: Comments on DRAFT EIR for Village Farms

Categories: VFD Comment

CAUTION: **External email. Please verify sender before opening attachments or clicking on links.**

Dear Planning Commission Members;

Below are my comments on the DEIR for Village Farms:

1. This project, a rehash of the Covell Village project, received a resounding "No!" vote from this group in 2005.

149-1 1. This project is being built on 200 acres of flood plain. FEMA rates this flood Zone A, which has a 25% chance of flooding within a 30 year mortgage. The odds will not be in your favor for Re-engineering a 400 acre farm land, that is currently absorbing excess rainwater, and few engineers have experience with potential catastrophic flooding. And California is now experiencing extreme drought and extreme atmospheric rivers that have caused catastrophic flooding in the central valley (Natomas, Mace Ranch [poorly designed flood control resulting in City of Davis being sued and having to buy 700 acre Howat Ranch to use as flood control], Tulare). With our federal government being dismantled as we speak, we can predict that there will be no funds for levee or dam maintenance or repair so any projects that build on flood plains will be vulnerable and possibly not be able to be insured. Further, all the homes may require additional flood insurance, adding to the costs for new homeowners. Where will the developer be when this happens??

1. 2. This project has no confirmed overpass or underpass for school children travelling on bikes to and from schools at F St, Covell or Pole Line road. It is very unlikely that there will be an overcrossing at F st due to the railroad tracks. However the EIR still presents no answer about a Pole line undercrossing. Why not?? The developer should have the answer by now as the developer has had 20 years to address this problem. This EIR is seriously inadequate by not providing this critical information. The amount of additional traffic that this development will **149-2** create from parents getting their kids to and from schools each day will be staggering as there are zero schools or daycare centers planned within the site. This creates very unsafe conditions for young children to travel by bike across Pole Line or Covell. The developer claims that the Cannery railroad underpass can be used, but this is not remotely adequate and that underpass is over a mile away, as the crow flies, from the northern part of the development. There has already been a death at the corner of Covell and Pole Line. Ellie Gerhardy died while riding her bicycle on July 16, 1997.

Letter 149 Cont.

149-3

1. 3. This current version of Covell Village is demanding that 952 mature trees be removed from the site to make room for a reworked ditch. Virtually 77% of the mature trees on the property are being felled for this project. This is a LOT of nesting habitat for hawks (Swainson's, Redtail and Kites) that is being ruthlessly eliminated from this site for a superfluous reasons. Swainson's hawks are a state endangered species that favor lone trees in agricultural pastures. Pairs build nests in tall, older trees, near the top of the tree. This will be a massive loss of mature trees and will have immense effects on habitat and environment. This is unacceptable.

149-4

1. 4. They are proposing to remove dirt from the UATA land which has very high levels of arsenic to try and fill in the flood plain. This UATA (urban ag transition area) site is directly adjacent to the unlined old city landfill that has toxics issues as well. After 10 ft of soil (from the UATA area) is removed, there will be a huge pit in the ground where runoff from the old landfill will collect, soak in the ground, and potentially further contaminate the groundwater. It is a terrible idea to use arsenic contaminated soil to fill in a flood plain.

149-5

1. 5. The old unlined city landfill monitoring wells have been tested and have high levels of PFASs "forever chemicals" , and manganese, coming from the landfill exceeding maximum concentration levels allowed. Would the Village Farms residents be informed about the potential dangers?? Will they have to sign NDAs and promise never to sue the developers, his heirs or the city? What happens if the City has to take on the liability of this site...you guessed it...everyone ELSE pays for this and never the developer. We need to require that the developers, and all heirs, assume all legal liability for the foreseeable future regarding the Village Farms project.

149-6

1. 6. The proposed fire station is not necessary because the vast majority of fire station calls are medical related, not fire related. Instead, what makes much more sense, is an emergency medical station which could be located almost anywhere in East Davis. The costs of a new fire station and it's long term expenses, is enormous. It is a huge expense to build, equip, staff and operate long term. A fire station is a long term and very expensive cost for everyone in Davis. The emergency medical concept has been advocated by the general public for years.

149-7

1. 7. Additionally, the proposed Heritage Oak Park will be located at the corner of Pole line and Covell where there will be the most amount of air exhaust exposure for children and their family members. This will severely affect children's lung health. Also, there are high levels of Lead and Toxaphene in the soil at this site.

149-8

1. 8. This DEIR is woefully deficient in many details and information such as the feasibility of the Pole Line Road undercrossing and how it could be paid for. Why has this not been determined after 20 years? This is a critical component needed by the project. Further, the developer has not committed to paying for it, if feasible. The developer needs to pay for all the infrastructure that will be required to mitigate the effects of this gargantuan project.

149-9

1. 9. CEQA requires that the alternatives have lesser impacts, yet all of the alternatives are 1,800 units or more, except the "No project" alternative and the original 1,395-unit project which had



149-9 Cont.

a very similar layout to the 1,800 unit Proposed Project that the developer had the DEIR analyze first.

1. 10. There is absolutely no consideration of the proposed alternative to developing the entire parcel: build only below Channel A, an alternative that has been ignored. The DEIR should have included analyzing building only below Channel A, preserving the vernal pools and reducing the housing units to a reasonable number. This design avoids the bulk of the flood plain, and moves housing much further away from the Old City Landfill and Sewage Treatment Plant toxics leakage.

149-10

149-11

1. 11. Finally, Davis voters have completely rejected this massive project in 2005 at the ballot box.

1.

Thank you for your time;

Liz Reay, M.S., RBP (retired)
ereay58@outlook.com
530-902-3248

LETTER 149: LIZ REAY (LETTER 1 OF 2, 02/10/25)

Response to Comment 149-1
Please see Master Responses 1 and 4.

Response to Comment 149-2
Please see Master Response 6.

Response to Comment 149-3
Please see Master Response 7.

Response to Comment 149-4
Please see Master Response 3.

Response to Comment 149-5
Please see Master Response 3.

Response to Comment 149-6
Please see Response to Comment 75-51.

Response to Comment 149-7
Please see Master Response 3, as well as Response to Comment 47-1.

Response to Comment 149-8
Please see Master Response 6.

Response to Comment 149-9
Please see Master Response 2.

Response to Comment 149-10
Please see Master Response 2.

Response to Comment 149-11
Please see Master Response 1.

Letter 150

Dara Dungworth

From: Elizabeth Reay <ereay58@outlook.com>
Sent: Saturday, February 22, 2025 3:13 PM
To: Dara Dungworth
Subject: DEIR for Village Farms Development Project
Attachments: Village Farms Planning Commission DEIR COmments E Reay 2-22-2025.docx

Categories: VFD Comment

CAUTION: **External email. Please verify sender before opening attachments or clicking on links.**

Please find attached my comments and objections concerning the DEIR for Village Farms: This project WAS VOTED down by Davis voters in 2005. After 20 years of opportunity to fix issues the project returns with few changes .

150-1

1. This project is being built on over 200 acres of flood plain. Let's remember: Mace Ranch had poorly designed flood control resulting in City of Davis being sued and having to buy 700 acre Howat Ranch to use as flood control. All the homes may require additional flood insurance, adding to the costs for new homeowners.

150-2

2. This project has no confirmed overpass or underpass at F St, Covell or Pole Line road for school children travelling on bikes to and from schools. The EIR still presents no answer about a Pole line undercrossing. Why not?? The developer should have the answer by now as the developer has had 20 years to address this problem.

150-3

3. The developer will be removing 77% of the mature trees. This is nesting habitat for Swainson's Hawks, Redtails and Kites. Swainson's hawks are a state endangered species that favor trees in agricultural pastures. This will be a massive loss of mature trees and will have immense effects on habitat and environment. This is unacceptable.

150-4

4. They are removing massive amounts of dirt from the urban ag transition area, which has very high levels of arsenic, to fill in the flood plain. This area is directly adjacent to the unlined old city landfill that has toxics issues as well. It is a terrible idea to use arsenic contaminated soil to fill in a flood plain and create potential for leeching more toxics into the water table.

150-5

5. The old unlined city landfill has leaked high levels of "forever chemicals" exceeding maximum concentration levels allowed. Would the Village Farms residents be informed about the potential dangers?? Sign NDAs?? What happens if the City has to take on the liability of this site...you guessed it...everyone ELSE pays but not the developer. Require that the developers, and all heirs, assume all legal liability for the foreseeable future regarding the Village Farms project.

Letter 150 Cont.

150-6

6. The proposed fire station is not necessary. The vast majority of fire station calls are medical calls, NOT fire related. An emergency medical station is more useful and could be located almost anywhere in East Davis.

150-7

7. The proposed Heritage Oak Park will be located at the corner of Pole line and Covell where there will be the most amount of traffic and air exhaust exposure for children. There are also high levels of Lead and Toxaphene in the soil at this site where kids will be playing in the dirt.

150-8

8. The DEIR needs to include analyzing building only below Channel A, preserving the vernal pools and reducing the housing units to a reasonable number. This design avoids the bulk of the flood plain, and moves housing much further away from the Old City Landfill and Sewage Treatment Plant toxics leakage.

150-9

9. Lastly, the "affordable housing" will NOT be affordable for UC workers. Small houses priced at over $700K or $800K is not very affordable for staff workers. If the developers are targeting UC staff, they will need to have units that are much more affordable.

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LETTER 150: LIZ REAY (LETTER 2 OF 2, 02/22/25)

Response to Comment 150-1
Please see Response to Comment 149-1.

Response to Comment 150-2
Please see Response to Comment 149-2.

Response to Comment 150-3
Please see Response to Comment 149-3.

Response to Comment 150-4
Please see Response to Comment 149-4.

Response to Comment 150-5
Please see Response to Comment 149-5.

Response to Comment 150-6
Please see Response to Comment 149-6.

Response to Comment 150-7
Please see Response to Comment 149-7.

Response to Comment 150-8
Please see Response to Comment 149-10.

Response to Comment 150-9
Please see Master Response 1.