

June 8, 2021

Dear Planning Commissioners,

I am writing with great concern regarding many of the recommendations which were made by the Housing Element Committee, but I will comment on each individually.

1) I am in full support of the recommendation of exploring more funding for affordable housing via the information included of the Draft Affordable Housing Trust Fund document proposed by the Social Services Commission, with the clarification that the resulting research needs to be presented to the public for an inclusive process.

2) I support having a program to implement an Affordable Housing Trust Fund.

3) I am opposed to eliminating single family housing to allow 2-plexes, 4-plexes or larger multi-family housing projects. While this concept has been pushed as a “solution, it is quite the contrary. It would be unfair and detrimental to Davis neighborhoods and their residents particularly homeowners, who have purchased and invested in a neighborhood zoned for single-family housing only to find out that a non-resident homeowner has their unit to allow a 2-plex or 4-plex or larger multi-family projects to be built in between single-family homes.

Homeowners should be able to have trust and confidence that their neighborhood zoning when they purchased, would not be pulled out from under them later on for higher density housing which would bring unavoidable impacts with it. Shoe-horning in higher density housing within an already established neighborhood is an entirely different situation than planning a new development from scratch. The City needs to protect residential zoning to assure residents and home owners that their commitment and investment in their home and their neighborhood is not going to be pulled from under them in the future.

Further, there is no doubt that lower income neighborhoods, like East Davis, would be hardest hit by this policy, so this is a socio-economic disparity issue as well.

4) The concept of eliminating parking minimums is a counter-productive concept until the City develops a robust public transit system serving the needs of all of the Davis residents, not focus primarily on UCD student needs as it now does. I will include my comments from my earlier letter to the Commission on this issue.

“With the need for more workforce and family-oriented housing, there will continue to be a need for adequate parking. Workers as well as families with children, typically need adequate parking for their cars to get to work in many cases (particularly if they work outside of Davis) and to meet the transportation needs of children.

For example, it is hard to understand why Davis, being the small City that it is, does not have a school bus system, which is greatly needed. This is a sustainability issue since having a robust school transportation system would significantly reduce weekday traffic and carbon emissions due to the need for thousands of Davis children to be transported on a weekday basis by parents, or other private means, to Davis’ elementary, junior high, and high schools. Having a Davis school bus system would significantly reduce traffic and congestion, and reduce our carbon footprint.

Compounding this problem is the added issue of an existing inadequate bus system that is designed primarily for the needs of UCD students, not other Davis residents. As mentioned previously, this is a significant shortcoming that needs significant improvement. It is irresponsible that the institution of UCD has not helped fund the bus system historically, and instead has basically put this financial burden on its students and the City of Davis. There has been recent discussion about pursuing this issue with UCD but the UCD administration continues to drag its heels on helping to resolve this significant issue. Language in the Housing Element to resolve this problem is needed.

A popular, but impractical suggestion that less parking should be provided for even high-density housing is not logical and counter-productive. If you don't provide adequate parking, you simply push the parking needs on to surrounding neighborhoods."

5) The issue of expecting the City come up with data already available by SACOG and HCD for this ADU issue is waste of effort asking for the City to spend the time and its resources to come up with data that the proposer of this recommendation would prefer, rather than accepting the SACOG data available. The alternative option is to have the proposer of this recommendation to do the research themselves, or get help for another entity, collect the data and then bring it to the City and SACOG to evaluate any perceived disparities with the current ADU data that the City used.

6) I have submitted a letter prior to this communication explained the multitude of reasons why the 1% growth rate policy must not be removed. Davis citizens historically have been very clear on the need for this policy, not only because there was unbridled growth before Measure J but because Davis is a very small City with limited land, but surrounded by agricultural land and open space. Davis must not be expected to produce the same amount of growth as other much larger cities and to maintain consistency with our General Plan policies and to preserve a good quality of life in Davis. Davis has always fulfilled its fair share of growth RHNA assignment and the 1% growth cap has exemptions for affordable housing and for exceptional projects. So, there is absolutely no need to remove the 1% growth cap.

Below is more information on this issue from my May 14th, 2021 letter submitted to the Housing Element Committee and recently to the Planning Commission:

The 1% growth rate policy needs to be preserved

The 1% growth rate maximum is important to preserve. This policy was put into effect for many reasons, and was initiated and strongly supported by the Davis community. One example of why it was initiated was the surge of housing in 1999 when almost 1,000 housing units were approved by City Council in *only one year*. The resulting negative impacts on the community were overwhelming fiscally, as well as on City services, infrastructure, traffic and circulation, and on the City's school system. Most importantly, it consumed a disproportionate amount of the available vacant land for residential developed in much too short a time span. The reality is that Davis is small city geographically, it has limited capacity of roads which simply can't be widened, and it is limited in its ability to rapidly deploy providing municipal services in response to rapid urban expansion. Therefore, we need to have a reasonable pace of residential development that is within our capacity to *not* overwhelm the City's services, infrastructure, traffic and circulation, and school systems.

Furthermore, eliminating our City's 1% growth rate policy is not necessary since the policy has exemptions for "exceptional" projects which are considered to be beneficial to the City. For instance, staff implemented this exemption and considered some of the "mega-dorm" projects are "exceptional"

providing “benefits” to the City, therefore they were exempted from the being counting in the annual growth average growth rate for housing.

A community-based General Plan should provide the guide for the community’s growth, including the amount, type, densities, locations, and timing of residential growth. Because of the lack of specific direction from the General Plan, but due to clear input from the public who strongly supported the 1% growth cap, the City Council studied and adopted the 1% residential growth guideline (later changed to a cap) to help deal with numerous infill and peripheral housing developer proposals. The Council needed a rationale to address the amount and timing of residential growth. The Council studied housing “needs” based on assumptions including local employment; UC Davis demands and supplies of housing for students, faculty and staff; and so-called “natural growth” (births over deaths). The Council adopted subsequent resolutions to address the needed types of residential growth.

Without a community-based General Plan or other approaches like the 1% guideline/cap, what rationale would the Council use for making decisions about residential growth?

- Arbitrary case-by-case decisions based on private developer proposals?
- How many beds / units should be provided by UC Davis on-campus and how many should be approved in the City and where?

How can the community residents and service providers (utilities, police, fire, schools) have any predictability or certainty about this growth?”

Finally, Davis is a very small City with very little vacant land left and far less infrastructure than large cities, so it cannot be expected to grow the same extent as other larger cities.

7) The concept of allowing housing on “strip malls” which in Davis, are actually neighborhood shopping centers makes this recommendation misleadingly sound positive, however it actually is far more destructive. These neighborhood centers, unfairly deemed “strip malls” are neighborhood shopping centers that the surrounding neighborhoods depend upon for the retail services, particularly grocery stores. So, the suggestion of demolishing these sites to shoe-horn in more housing, would likely result in the loss of these retail stores permanently. This is particularly since parking would be sacrificed as well, which the retail stores depend upon to succeed. The Davis Manor Shopping Center for instance, is in the lowest income neighborhood of the City, which depends on this small shopping center, particularly for many nearby lower income residents who do not have cars. The need for this neighborhood center is also important since it reduces our carbon footprint in this lower income neighborhood where many residents walk to it regularly for food and other needs.

8) The “By Right Ministerial Approval” proposal is an “end run” around the City’s “Infill Guidelines” developed years ago if it is an infill project whether it is affordable housing or market rate housing. These City of Davis Infill Guidelines define a process to allow input from surrounding neighbors of an infill project before approval. This way potential consequences from the project can be discussed and mitigated to avoid conflict and negative impacts upon neighbors.

9) The suggestion of exempting the Wildhorse Ranch or the Signature Property inside the Mace curve from Measure D, are both unacceptable proposals. This is yet another “end run”, this time around Measure D. This would basically be a “blank check” for a developer to have a pre-approval for the City to build anything they would want to on these agriculture parcel without any input from the community on the final project. The point of Measure D is to give the City leverage to negotiate getting a well-planned project with amenities to make it worth developing agricultural land or open space. The public then gets

the opportunity to weigh in on a defined project. Another, problem with this exemption suggestion is the fact that it amounts to a huge subsidy to the developers of these two properties and therefore is a disparity issue as well.

10) The concept of increasing the RHNA requirements are not logical, nor reasonable because Davis is a small City with very little vacant land left. The City is facing enough challenges trying to accommodate the 2,075 SACOG RHNA assignment, so striving for more does not make sense. Furthermore, these same facts are why Davis cannot be expected to grow to the same extent as larger cities, with far more land and infrastructure.

A few important recommendations to add to Housing Element update:

1) UCD needs to build far more on campus housing for its students, faculty and staff to relieve pressure from the City, and to allow more of the city's housing to be occupied by our workforce and families.

Much stronger policies pressuring UC Davis to build far more and higher density housing on the campus for their students as well as their faculty and staff is needed in the Housing Element Update. UCD has been talking about on-campus housing for faculty and staff housing for years, yet continues to kick-the-can-down-the-road.

UCD is the largest UC with over 5,300 acres and a 900-acre core campus. It is the largest UC in the system yet it is not even offering 50% on-campus housing like the other UC's. Land costs are the biggest factor in producing housing and since UCD's land is free, UCD on-campus housing is the best option for creating far more affordable housing for its students, faculty, and staff.

UCD needs to plan *far* more housing to make up for the deficit of housing on-campus that they did not build for their accelerated growth over the last two decades.

It is inexcusable that UCD's Orchard Park site *is still vacant* after 7 years and the earlier proposal was for low density housing. UCD needs to build much higher density housing of at least 7 or more stories, not the paltry 3-, 4- or a rare 5-story structure that they have been building. Even the City has approved two 7-story housing projects at this point. On-campus housing significantly reduces transportation, and parking needs and there for reduces its carbon footprint.

More housing on the UCD campus is needed to reduce the housing pressures on the City of Davis. Relieving this pressure would allow more of the City's housing to be occupied by our workforce and families needing housing in Davis and to helped reduce housing costs in the City.

2) The Shriners property and the Signature property inside the Mace curve need to be considered for traditional housing needed by our workforce and families. There are many reasons for this that I covered in my May 14th letter, but I will reiterate them here again.

After hearing a Committee member's recommendation at an earlier Housing Element Committee meeting for the Shriners Property and the Signature property inside the Mace curve, I agree that both are very good sites to consider for future residential development. It is relevant to recognize that the Shriners property was in the Davis Sphere of Influence in the 2001 General Plan. Since the vast predominance of approved housing for the past few years has been student-oriented multi-family group housing (over 5,400 beds) there is a need for traditional housing for our workers and families. In

particular, we need less expensive smaller homes on relatively small lots with yards particularly for residents with children. This would help to rebalance our City's demographics which has been negatively impacted by disproportionately approving an excessive amount of exclusionary (by design) student group housing mega-dorms, while not providing enough traditional housing for workers and families. If this demographic imbalance is not addressed, it will likely result in Davis losing more schools. However, how much and where this housing is located are critical details.

The Shriners property is a good site particularly because it has a bicycle underpass under Covell Blvd. for safe bicycle connectivity. The Signature property would also be able to be connected to the bicycle pathway systems to and from Harper Junior High School and Korematsu Elementary School and beyond. This, and a number of other reasons, are why these two parcels make the most sense for residential development including: a) the fact that they have no flood plain issues, b) the location of these both of these sites have plenty of road capacity to handle traffic, and c) neither has land toxics issues, like some other parcels (i.e. Covell Village).

The Shriners site also, is of a large enough size to allow a substantial number and variety of different sizes, types, and price ranges of housing units from multifamily to duplexes to single family units for workforce housing and for families who desire a yard for small children to recreate in.

At this point, the City does not have many vacant parcels within the City to provide the 2,075 RHNA units assigned to Davis by SACOG, particularly for traditional housing for our workforce and families. It is also legitimate to question this roughly *double* RHNA housing requirement of Davis from last time, given that the City essentially has so little land left for residential development and needs to preserve what few commercial parcels it has left for revenue generation. Davis has consistently satisfied its RHNA fair share requirement historically, including providing more affordable housing (i.e. 25%-35% per multifamily project) than other communities. While more housing, including more affordable housing, is needed now, this total number of 2,075 RHNA units including over 40% affordable units, appears disproportionate for a city the small size of Davis with so little developable land left within the City.

In closing, I would appreciate the Commissioner's considering my comments from May 14th letter previously sent to the Housing Element Update Committee, and recently sent to the Planning Commission. Please feel free to contact me if you have any questions or wish to discuss at (530) 756-5165.

Thank you for your time and consideration,

Eileen M. Samitz