

## Dara Dungworth

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**From:** Alex Achimore <alexachimore@yahoo.com>  
**Sent:** Monday, July 29, 2024 2:21 PM  
**To:** Dara Dungworth  
**Subject:** Another try at comments for Shriners

**Categories:** Yellow Category

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Hi Dara,

As I'm sure you can tell from my previous email, I'm struggling a bit to distill out the relevant environmental impact issues from development economics, what I believe Davis does and doesn't need, and some frustration with the process (perhaps we can discuss some day). So, I thought I'd take another crack at a set of comments that are more on point:

I believe a denser project with far fewer detached single-family houses could accommodate the same number of people with less environmental impact. In lieu of so many detached houses, a denser project could include attached units, such as duplexes and townhouses, which take up to 40% less energy to heat and cool, consume less land (undeveloped land absorbs carbon and runoff), and reduce vehicle miles travelled by being closer together.

I appreciate that an alternative has been suggested for the EIR that concentrates all units on 100 acres but am suggesting a modified version that may be more realistic (i.e. doesn't imply that half the site never be developed). My suggested alternative would:

Concentrate most of the units in the southern half of the site (about 115 acres) in medium and high-density housing, which would ensure mostly attached units and a walkable community that could better support transit.

Develop the northern half in very low-density housing (about 75 large lots similar to Willowbank) interspersed with public parks (the proposed park on Covell could be better used as high-density housing) and well-planted drainage ponds. Very low density in this area could then support a rich tree canopy, act as a carbon, runoff, and heat sink for the overall site, as well as provide recreation and open space. I think that would be better for the environment than leaving it in farmland but would look to the EIR study to confirm.

There would be no low-density residential--my assumption is that pattern has the greatest amount of negative environmental impacts.

To address increased traffic on Covell, if it is not already in the works, the EIR could also consider adding a lane in each direction from the narrowing near Harper School to the intersection at 2nd street where Mace becomes 4+ lanes. That would eliminate the merging, which now backs up traffic and will only get worse.

I hope this version is more helpful.

Thanks,

Alex

## Dara Dungworth

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**From:** Alex Achimore <alexachimore@yahoo.com>  
**Sent:** Saturday, July 27, 2024 2:21 PM  
**To:** Dara Dungworth  
**Subject:** Shriners Property Comments

**Categories:** Red Category

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Hi Dara,

I've studied the information on the website and attended the meeting on the 25th, where I had a good conversation with one of the applicant's team, some of which is recapped in my overall comments below:

I don't believe it is possible to build a detached, single-family house in Davis anymore that is 70% the median price of houses here. I think even a 2-br, 1-bath house on a 2,500 square foot lot will cost more than that, or in any case more than \$650,000, which doesn't begin to tackle the missing middle in the manner stated in the application.

I do get that the EIR isn't supposed to touch economics, but that leads to the environmental problems that detached single-family houses cause vs. attached, even humble duplexes.

In Davis right now, 3-br, 2-ba condominium units in townhouse or duplex configurations, on the ground and with yards are selling for less than \$600,000. Building more of those instead of so many freestanding houses would more likely achieve the 70% price target, and that would have multiple environmental advantages:

- Up to 40% less energy to heat and cool than detached houses due to party walls.
- Less land consumed, less pavement (lowers heat island),
- Lower vehicle miles traveled to get around.

Ironically, very low density housing a la Willowbank or around the Davis Municipal golf course, can be better for the environment than the low density detached housing that makes up most of the Shriners project because of the potential for a rich tree canopy and more unpaved land to absorb runoff.

So when concocting "alternatives" to study in the EIR, I would like to see one where the southern half is all medium- and high- density housing, which would promote walkability and make transit more achievable, and the northern half is all very low density housing (35,000+ square foot lots). That also would pull their large park up into the northern half, but I think land on Covell is too valuable for access to leave housing off that area anyway. I believe, but the EIR could prove or disprove, that the environmental impacts of a scheme like that would be less than their current plan.

Again, economics isn't supposed to play in, but of course it is the gorilla in the room. I would expect the profit would be lower, but far from negligible, and the unit count could even be higher. Without asking anyone to open their books, I think it would be reasonable to ask the developers why they couldn't make it pencil out. On the Curve is proposing a much denser scheme, so I would question why others couldn't. And with about 1/3 of the detached houses in Davis owned by persons like myself who are over 65, we should be building other types right now anyway.

On a related note, having still not heard what the "alternatives" for Village Farms are, I have to admit being suspicious they will not be much different from the submitted plan, at least not in the way I am describing one for Shriners above. Happy to be proven wrong--can you tell me when we will know what they've been studying?

Thanks,

Alex Achimore

## Dara Dungworth

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**From:** clutterbarbara@gmail.com  
**Sent:** Monday, July 29, 2024 11:28 AM  
**To:** Dara Dungworth  
**Cc:** 'Mary Nisson'  
**Subject:** NOP for Shriner's Project

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City of Davis Principal Planner,

Dara Dungworth

July 29, 2024

RE: NOP for Shriner's Project

Dear Ms. Dungworth,

I am a parent of an adult with a developmental disability. I'm sorry that I was unable to attend the July 25th Scoping Meeting, so I thank the City of Davis for the opportunity to express my concerns and desires via email.

It is crucial to me and my family that my son will have a place to live that will meet his needs **locally!** My wife and I are older parents, and we want to be sure that he is set up for independence in our lifetimes. The best way to ensure that happens is to set him up with a living space that is near us so that we may be nearby to assist the staff of independent living agencies in preparation for replacing our care when we die.

Part of my son's ability to be independent will require an I/DD-dedicated "supportive apartment" in a setting that will promote his health and well-being like those that the Regional Center has helped to design and/or fund in Sacramento and other cities. Mutual Housing would also work with Alta Regional on a program on the Shriner's Property where some of the rental units would be made available to individuals with intellectual and developmental disabilities. However, the Shriners Property must first become a reality as proposed, before Davis families, the interested developer, the Regional Center, and other agencies can plan construction. With a gym, a park, a coffee shop and other features envisioned for the Shriners Property community, we could conclude our remaining years resting in the assurance that our son can live a full inclusive life after we are gone. Our son deserves to stay in the familiar community he calls "home" - Davis! We thank the City of Davis for moving forward with the NOP and are confident you will do what's needed to take care of our beloved individuals with disabilities.

Thank you,

Barbara Clutter and Betty Hesters

2432 Westnesse Rd., Davis

[snoopsscooby@att.net](mailto:snoopsscooby@att.net)

## Dara Dungworth

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**From:** G. Francis <gpfalt@gmail.com>  
**Sent:** Monday, August 12, 2024 4:43 PM  
**To:** Dara Dungworth  
**Subject:** Support for Shriners Property project

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Dear Ms. Dungworth,

As a 6.5-year resident of Davis (I live in East Davis at 3638 Cubre Terrace), I write to strongly support approval of the proposed project on the Shriners Property.

Like so many Davisites, one of the reasons I moved here and love living here is the ability for my whole family - children included - to safely get around town by bike, bus, and walking due to the city's traditional support for density and sustainability in its planning. I have several family members who would love to move to Davis but are put off by the high (for the Central Valley) and rising housing prices. My long-time Davis friends all tell me that Davis used to be much more accessible for middle-income families but that affordability has decreased in the past two decades as the pace of new housing construction has trickled. It's clear that our town desperately needs more housing to support its values of inclusivity and sustainability.

Given that, we absolutely need housing developments like the one proposed on the Shriners Property. I particularly support the options that involve larger numbers of units. Our housing shortfall is so dire that we need as many housing developments as possible.

As an added benefit, this project will bring much-needed revenue to the city through property taxes and the sales taxes that the new residents will contribute to our local businesses. I urge the city to support this project.

Best regards,  
Greg Francis  
Davis resident

## Shriners Property Notice of Preparation Comments

By Ari Halberstadt, Davis resident

Below I discuss several aspects for consideration in the EIR to mitigate impacts from the proposed Shriners Property development:

1. Greenhouse gas emissions
2. Density, local services, and transportation
3. Native habitat and wildlife

### Greenhouse gas emissions

The proposed Shriners Property development will cause the emission of significant quantities of greenhouse gasses. Davis has made commitments under CEQA and in its Climate Action and Adaptation Plan (CAAP). The proposed project will exceed the greenhouse gas emissions threshold identified by the city, such that the city should consider all feasible approaches to mitigate greenhouse gas emissions from the project. Below, I discuss several sources of greenhouse gasses from the proposed project, as well as feasible ways to mitigate some of those emissions, for consideration in the EIR.

The development will generate greenhouse gas emissions from several sources, including:

- Conversion from farmland
- Embodied emissions from construction
- Energy consumption over the lifetime of the project

### Farmland emissions

Current emissions from farmland will be lower than from the proposed project. Greenhouse gas emissions per year per acre of agricultural land in California may range from -2.24 MTCO<sub>2</sub>e for alfalfa to +3.95 MTCO<sub>2</sub>e for tomatoes<sup>1</sup>. For the site's 232 acres of land, this gives a range of -520 to 916 MTCO<sub>2</sub>e per year when the land is used for agriculture.

### Embodied emissions

Construction and operation of the site will result in much higher emissions than its current use as farmland. Embodied emissions from construction of the homes for the project could be roughly 35,000 MTCO<sub>2</sub>e. This estimate is based on the given number of units, an estimate of the size of each unit, and an approximate value of 184 kg CO<sub>2</sub>e/m<sup>2</sup> for emissions for residential construction<sup>2</sup>. These embodied emissions do not include emissions due to all activities or resource use, and therefore may be an underestimate. In my comments on Davis' CAP submitted in October 2022, I wrote that the city should include measures to reduce emissions due to construction, such as using lower-emission cement and steel. According to Rocky Mountain Institute, "reductions of 30 to 50 percent can be demonstrated with

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<sup>1</sup> Shaffer S and Thompson E Jr 2015, A New Comparison of Greenhouse Gas Emissions from California Agricultural and Urban Land Uses, American Farmland Trust, <https://farmlandinfo.org/wp-content/uploads/sites/2/2019/09/AFTCrop-UrbanGreenhouseGasReport-February2015-Edited-May2015.pdf>

<sup>2</sup> Magwood C et al 2023, The Hidden Climate Impact of Residential Construction, Rocky Mountain Institute, <https://rmi.org/insight/hidden-climate-impact-of-residential-construction/>

commercially available, affordable, and code-compliant building materials”. A reduction in embodied emissions of 50% could reduce these emissions by 17,500 MTCO<sub>2e</sub>.

### Emission reductions and other benefits of a community microgrid

Emissions from energy consumption over the lifetime of the development will depend on the energy mix used to power the project and on the amount of energy consumed by the development. California requires new single-family and low-rise multifamily homes to have solar photovoltaic systems, which I estimated at an aggregate 3 MW for this project. Baseline emissions due to electricity consumption with the required 3 MW of solar photovoltaic capacity would be about 9,600 MT CO<sub>2e</sub> over 25 years<sup>3</sup>.

In contrast, incorporating a community microgrid into the development would provide significant financial, resilience, and environmental benefits. A community microgrid with 6.4 MW solar photovoltaic generation capacity and a 2.5 MW / 26 MWh battery system could provide much of the energy needed for the development. Benefits of such a system include:

- **Reduction in lifetime emissions by 7500 MT CO<sub>2e</sub>**, to 2,131 MT CO<sub>2e</sub> over 25 years, compared to the baseline 3 MW PV capacity. That is a reduction of about 78% in lifetime emissions.
- Providing a 25-year **net present value of over \$67M** dollars from savings on electricity, at a municipal 4% discount rate.
- **Saving households \$41M in present value** on electricity costs, over the same 25 years, but assuming an 8% household discount rate. That’s like giving an average discount in present value of \$20,000 to each household.
- **Providing energy equity**, enabling all residents to benefit from reduced energy costs, cleaner solar generation, and resilient battery backup. Those living in housing who are not able to or required to install solar or batteries will benefit equitably from the shared community energy resources.
- **Providing resilient energy to all residents**, with up to 10 hours of battery power at peak load, about a day at average loads, and multiple days serving reduced or critical loads.
- **Decoupling customers’ electricity prices** from PG&E’s rapidly escalating rates, rather than enduring a significantly higher increases under PG&E rates.
- **Reducing strain on the larger electric grid** by reducing demand and evening peaks, using excess midday solar to charge the batteries, and producing and consuming most energy on-site.
- **Potentially avoiding or reducing interconnection delays**. By reducing grid impacts, potential upgrades to the distribution grid could be avoided. In addition, the project could run in islanded mode while interconnection is being finalized, allowing homes to be occupied sooner and avoiding costly losses due to interconnection delays.
- **Reducing social costs by \$2M by lowering pollution**. The social value of reducing greenhouse gasses and other pollutants (SO<sub>x</sub>, NO<sub>x</sub>, PM<sub>2.5</sub>) could be an additional \$2M, compared to the social cost of emissions with the baseline 3 MW of required solar photovoltaics.

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<sup>3</sup> Based on an analysis using NREL’s REopt (available at <https://reopt.nrel.gov/tool>) using load profiles for all-electric homes with 15% of residences adopting EVs and assuming the homes are occupied in 2027. In REopt, customers were assumed to be on PG&E’s schedule E residential all electric utility rate for baseline territory S in the non-microgrid scenario.

Such a community microgrid could be enabled by creating a municipally owned electric corporation (“muni”) to provide electricity to the residents of the development. This muni could also provide similar service to any other new developments in Davis, extending these benefits to additional residents.

#### Attaining climate goals of Davis’ CAAP

Davis’ GHG inventory estimated emissions to be 567,000 MTCO<sub>2</sub>e in 2016. Davis set a minimum target for the year 2030 in the City’s 2023 Climate Action and Adaptation Plan (CAAP)<sup>4</sup> of 40% below 2016 levels, or 340,200 MTCO<sub>2</sub>e. The minimum 40% target (taken at a linear rate of decline, as indicated in figure ES1 of Davis’ 2023 CAP), implies emissions should decrease by 16,200 MTCO<sub>2</sub>e per year. Cumulative emission reductions to reach the target at this rate would be 1,587,600 MTCO<sub>2</sub>e compared to maintaining 2016 emission levels. By 2025, emissions should be at 421,000 MTCO<sub>2</sub>e to remain on target, and cumulative remaining emissions to 2030 should be just 203,000 MTCO<sub>2</sub>e.

However, emissions from construction of the proposed development could be over 35,000 MTCO<sub>2</sub>e. If only the required 3 MW solar PV were built it would result in additional emissions of 1,347 MTCO<sub>2</sub> for the first 3 years of the project through 2030 (assuming it becomes operational in 2027), for combined emissions on the order of 36,347 MTCO<sub>2</sub>e by 2030. Surface transit emissions from new residents would add many more tons of emissions. The project would therefore be a large new source of emissions representing a significant fraction of the needed cumulative reduction to reach the 2030 goal, even without emissions due to gas vehicles<sup>5</sup>. This calculation underscores the need to consider and mitigate all sources of emissions for Davis to meet its climate goals.

#### Davis should consider all feasible mitigation measures

Davis has made commitments under CEQA and in its Climate Action and Adaptation Plan (CAAP) that would require the city to consider all feasible measures to mitigate greenhouse gas emissions from development projects. Emissions from the proposed development, considering just embodied emissions from construction and operational electricity use, could be over 1,085 MT CO<sub>2</sub>e per year<sup>6</sup>, which exceeds the city’s bright-line threshold of 913 MT CO<sub>2</sub>e/yr for 2025. Inclusion of surface transit emissions would significantly increase this emissions estimate, and may meet the efficiency-based threshold as well. Therefore, under CEQA, the city should consider all feasible mitigation measures, including (but not limited to) those already identified in the city’s CAAP.

Davis defined minimum greenhouse gas (GHG) reduction targets consistent with CEQA Guidelines Section 15183.5(b)(1)(B) to “support future project CEQA streamlining as described in Section 2.2.2.” and “In compliance with Section 15183.5, the CAAP addresses the six necessary Plan Elements”. Further, the CAAP states that “At a minimum, Davis will attempt to reduce its GHG emissions 40% below 2016 levels by 2030.”<sup>7</sup> Davis defined a bright-line threshold of GHG emissions which is applicable to land-use

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<sup>4</sup> Davis 2023, 2020-2040 Climate Action and Adaptation Plan (CAAP), <https://www.cityofdavis.org/home/showpublisheddocument/18401/638173234962900000>

<sup>5</sup> A rough estimate for vehicle emissions is 3.9 MTCO<sub>2</sub>/year per vehicle, assuming fuel efficiency of 27 MPG and 12,000 miles driven per vehicle per year. Assuming an addition of 1000 gas powered vehicles due to the project, that’s 3,900 MTCO<sub>2</sub>e per year or 11,700 MTCO<sub>2</sub> for the 3 years from 2027 to 2030.

<sup>6</sup> Based on an estimate of emissions from electricity use and amortized construction and reasonable population estimates.

<sup>7</sup> 2020-2040 CAAP Adopted by City Council, <https://www.cityofdavis.org/home/showpublisheddocument/18401/638173234962900000>

development projects such as the Shriners Property project: “If a project’s GHG total amortized annual construction emissions and operational emissions would exceed the bright-line threshold, all feasible mitigation would be required to reduce emissions to a level below the threshold, or GHG offsets/credits purchased if feasible mitigation could not reduce emissions to the level required.”<sup>8</sup>

**The proposed project will exceed the bright-line GHG threshold for 2025 of 913 MT CO<sub>2</sub>e/yr, triggering CEQA’s additional requirements.** Emissions from just electric energy and amortized construction are estimated to be 1085 MT CO<sub>2</sub>e per service population/year. (Energy emissions with all-electric and energy-efficient construction and a baseline 3 MW of PV generation may average about 385 MT per year, construction emissions amortized over 50 years may be about 700 MT. Annual surface transit emissions could be over 3,900 MT CO<sub>2</sub>e per year and would therefore increase this estimate significantly.)

The city should consider all feasible mitigation measures, including those already identified in the city’s CAAP. Feasible measures include, but are not limited to:

- A community microgrid providing power to an all-electric development that would significantly reduce annual emissions from electricity while saving residents on their energy bills and providing equitable and resilient electric power. Technical, legal, financial, and operating mechanisms are available to enable a microgrid. Creation of a community microgrid is listed under measure BE.8 in the CAAP.
- More efficient construction materials and methods could halve embodied emissions<sup>9</sup>, reducing those to an annualized 350 MT CO<sub>2</sub>e. All electric energy-efficient buildings will reduce operating energy and associated emissions and support a community microgrid. The CAAP includes measures such as BE.4 All-electric new construction and TR.11 Develop sustainable housing.
- Higher-density housing and transportation measures can result in lower operating emissions, will facilitate better transportation management, and reduced VMTs. These types of measures are considered in the CAAP under, for instance, TR.9 Transportaion Demand Management program, TR.1 Electric Vehicle Charging Plan, and TR.11 Develop sustainable housing.

Other measures to reduce on-road transit and other sources of GHGs should also be considered, especially since this is the largest source of GHG emissions associated with the project.

Recommendations:

1. The EIR should consider a community microgrid to provide local renewable power and significantly reduce emissions due to energy consumption while increasing resilience and providing significant economic benefits.
2. The EIR should consider reductions in greenhouse gas emissions from the project by incorporating low-emission construction design, methods, materials, and technologies, including lower-emission housing types.
3. The EIR should consider all-electric and efficient (e.g., Zero Net Energy Ready) construction.
4. The EIR should consider additional measures to offset the remaining emissions from the project.

<sup>8</sup> Initial Study/Proposed Negative Declaration, p2-7, [https://files.ceganet.opr.ca.gov/285919-1/attachment/IPUDRuh1dv8hdmupkcTvEyNyJiZnOtP7L0kbDEKrMzTfLTnMYah4\\_dHgAgeLLSZasH3jUnbjpOYiCBaf0](https://files.ceganet.opr.ca.gov/285919-1/attachment/IPUDRuh1dv8hdmupkcTvEyNyJiZnOtP7L0kbDEKrMzTfLTnMYah4_dHgAgeLLSZasH3jUnbjpOYiCBaf0)

<sup>9</sup> Magwood C et al 2023, The Hidden Climate Impact of Residential Construction, Rocky Mountain Institute, <https://rmi.org/insight/hidden-climate-impact-of-residential-construction/>.



## Density, local services, and transportation

The city should consider how local services can be supported as new developments and housing are constructed. Higher density can reduce the need for travel and travel-associated energy and emissions. In a 15-minute city<sup>10</sup> the services needed by a community are located near to the community. This requires a sufficient density to support those services, yet the Shriners Property development has a proposed density of just 5.1 residences per acre. In addition, the developers have not included any commercial space to meet the needs of the community.

Single-family homes are the least efficient and least affordable homes, use the most resources and land for housing per person, and have lower density than other construction. The city should consider alternative housing mixes for the Shriners Property development, as well as alternative approaches to common spaces. For instance, the site could incorporate more multifamily structures with shared green space versus the currently proposed number of single-family homes. This would increase density, cut energy use, increase affordability, could enhance a sense of shared community, and could relieve pressure on habitat. Construction using manufactured modular homes could also significantly reduce construction costs and waste and provide more affordable housing.

Transportation interacts with energy consumption and community/urban design. The city should consider how it can reduce single vehicle miles travelled and reduce transportation needs. Vehicles account for significant emissions and other negative impacts, including traffic. Our transportation systems are in the process of conversion to electric systems, which will reduce tailpipe emissions. However, EVs will still use significant resources, produce pollution, and impact traffic. For instance, an all-electric passenger vehicle driven an average 12,000 miles per year could be expected to consume 5 MWh of electricity per year. This can be more energy than is consumed by a residence that was built with efficient construction and electric appliances. Further, vehicle ownership is expensive and not particularly affordable to many people. As noted above, sufficient density and situating services locally reduces transportation needs – yet the project proposes low-density construction with no local services.

### Recommendations:

1. Consider a more compact development with local services that reduce travel and its related impacts.
2. Consider construction of more multifamily housing to increase density and improve land use, e.g., leaving more open space for habitat.
3. Consider measures to support EV and public transport charging and bidirectional charging.
4. Consider additional measures to reduce transportation needs and impact and provide alternative transportation infrastructure.

## Native wildlife and habitat

We must protect and restore open space and habitat for wildlife and humans to thrive. The area encompassing Davis has lost much of its original habitat, wiping out most riparian zones, degrading the wetlands that thrived here, and displacing wildlife. We have a responsibility toward our fellow life to restore and protect it, ever more urgently as the earth's climate and environment degrade due to human

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<sup>10</sup> Allam Z et al 2022, The '15-Minute City' concept can shape a net-zero urban future, Humanities & Social Sciences Communications, <https://www.nature.com/articles/s41599-022-01145-0>

actions. Integrating nature locally into our cities will help restore humans to a more balanced relationship with the earth. The city, and engaged residents, have protected and restored parcels of habitat. The city can go further, and integrate local habitat more directly into new developments.

Habitat can be interwoven into an overall urban setting. The proposal includes “over 70 acres, or 30 percent of the overall project area, devoted to green infrastructure including, 19.5 acres of parks, 7.3 acres of neighborhood greenbelt, and 43.9 acres of urban agriculture transition area”. The city should ensure that open spaces include native habitat, especially native plants, and spaces conducive to local wildlife. Trees, shrubs, grasses, and other plants should be selected from local native species.

Organizations, like River Partners, restore native habitat along rivers – perhaps a restoration along the small creek bounding the north of the project could be undertaken. Native species will support local wildlife, improve soil health, and tend to be drought resistant. Architectural practices can enhance habitat, including such features as rain gardens, green roofs and walls, and more. Water management is an important element as well, and the development can incorporate grey water (which will also save energy) and elements like porous surfaces. In addition, by building a more compact development, more open space will be available for habitat.

Previously, I provided comments on shortcomings of the urban forestry plan. I recommend that the city consider more modern ecological urban forestry approaches and include an emphasis on native trees and habitat.

Recommendations:

1. Consider increasing the amount of natural habitat and incorporating habitat and nature throughout the development.
2. Consider habitat and plantings that support native wildlife.
3. Incorporate gray water to reduce water needs and recycle water.

## Dara Dungworth

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**From:** Rena Nayyar <renanayyar@hotmail.com>  
**Sent:** Monday, August 5, 2024 10:35 PM  
**To:** Dara Dungworth  
**Subject:** scope comments Shriners

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Please accept my comments for the EIR Scope Written Comments for the Shriners Property. I am also not sure if my comments are relevant to the scoping process or fit in elsewhere. So thank you for considering these comments where they apply.

-We here about the need for housing for students, people who work here or grew up here but can't afford to live here and seniors wanting to downsize. We already have several missed opportunities for these needs, such as housing renting by the bed which is really only for students. We need housing types that are available to everyone, including but not limited to students. The city needs to be better at negotiating with the university to build affordable housing for students and staff on campus where they can be sure the housing goes to them. This would free up existing housing in Davis, which would slow development while still meeting the need. One reason people want to live here is the quality of life which is in part due to the controlled development and strong downtown instead of the sprawl other communities have allowed. New development needs to preserve the character and quality of life in Davis.

-We need more information on the actual numbers. How many people have jobs nearby, and would move here if housing costs were similar to where they currently live? Others needing housing? What housing price ranges are needed? Can the city along with local businesses, the university and others take a poll of employees and community members, as the school district did?

-We need an economic analysis that addresses costs and benefits to the city with a future way to check if they are met. Also, does the development at least break even while being affordable? (What is the break-even cost of housing such that the property taxes will pay for the increased infrastructure needs so there is no net cost to the city? And how many units are there in this price range? And is this price affordable for the targeted potential buyers? And if not, how will more affordable housing be paid for?)

-We need good information on traffic impacts.

-We need very high density and no single family detached housing. We already have such housing in the city and we need to take seriously the responsibility of protecting our valuable agricultural lands and natural areas while creating density with enough critical mass for public transportation. We don't need any "McMansions" which are not affordable or sustainable. The total rate of buildout for this and other projects needs to be within Sacog's regional housing needs plan for Davis, not more.

-We will be in a cycle of never-ending growth if this project is not affordable (so we need another development that is), or if out-of-town advertising inflates the demand. Can there be waiting lists or some agreement with the developer to address this?

-Please do not allow development on any known flood plain areas, vernal pools, or other sensitive habitats.

-The project should be carbon neutral and have a low water demand.

Thank you very much,  
Rena Nayyar

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## Dara Dungworth

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**From:** Mike Webb  
**Sent:** Tuesday, July 9, 2024 2:04 PM  
**To:** Dara Dungworth  
**Subject:** FW: Agenda item 5 - Shriners Property

### MICHAEL WEBB

*City Manager*

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**From:** David Nisson <d.m.nisson@gmail.com>  
**Sent:** Tuesday, July 9, 2024 1:58 PM  
**To:** City Council Members <CityCouncilMembers@cityofdavis.org>  
**Cc:** Mary Nisson <ddfp.planning@gmail.com>  
**Subject:** Agenda item 5 - Shriners Property

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Dear Members of the Davis City Council,

My name is David Nisson, and I am an adult with developmental disabilities who was unusually fortunate to access the supportive low-income housing that I need to remain fully included in the Davis community. I'm writing about agenda item 5, and I ask the council to support the staff recommendation to move the Shriners Property into the Notice of Preparation phase. It's Disability Pride Month and one of the most pressing issues facing our developmental disabilities community is accessibility to low-income housing. There simply is not enough for my friends with developmental disabilities. Shriners Property is working towards providing dedicated Affordable housing for adults with Intellectual or Developmental Disabilities, which is desperately needed. Please move this project forward. Thanks for all you do!

David M. Nisson  
District 3 resident

Dara Dungworth, Principal Planner  
City of Davis Department of Community Development and Sustainability  
23 Russell Boulevard  
Davis, CA. 95616  
[ddungworth@cityofdavis.org](mailto:ddungworth@cityofdavis.org)

Dear Principal Planner Dungworth, members of the City of Davis City Council and Staff, and others who might read this email in future,

I am Mary Nisson, parent of an adult with developmental disabilities who is a client of the Alta California Regional Center. I also represent parents at meetings of the Yolo County Aging and Adult Services Commission's task force addressing the crisis of aging caregivers of adults with *intellectual disability* (indicated by an IQ test score of 50 or below), and/or with *developmental disabilities* (autism, Down syndrome, cerebral palsy, etc). Hereafter these terms are referred to by the initials *ID/DD*.

Regarding the Notice of Preparation of a Draft Environmental Impact Report In reference for the Shriner Property Project, I have two primary arguments in favor of continuing to move forward with the so-called "Shriners Property Project", so I request that staff does further research in the areas of the CEQA Appendix G environmental checklist so as to assure that the EIR includes information about the following issues:

1. I believe that data exists to suggest that building *ID/DD*- dedicated housing on the Shriners property will prove better for "**Air Quality**" and "**Greenhouse Gas Emissions**" than construction on alternative property that lacks enough disability-dedicated housing.

According to the U.S. Department of Transportation's "[Bureau of Transportation Statistics](#)", teens and adults with all types of disabilities drive far less than do the many air-quality-destroying adults *without disabilities* who drive at times when a bus or bicycle was an option. Especially dependent upon bicycles, public transportation, or being transported in a carpool are those with an *intellectual disability*-IQ score at a level too low for them to safely operate an automobile. Here is background information on housing for adults with *ID*, as well as adults with autism and other *DD* on the Shriners Property now being discussed/planned:

Over the months, the Alta California Regional Center's Community Services Director, [John Decker](#), has spoken at meetings to inform the City of Davis City Council members, staff of relevant departments, and the public that -- in cities throughout the Sacramento Valley -- he has successfully accessed funding from the California [Department of Developmental Services](#) (DDS), and from other agencies, to construct special low-income housing units dedicated for their adult-aged clients with *ID/DD*. Many residents with low IQ ("intellectual disability") or with certain *developmental disabilities* have functional limitations that *prevent them* from driving, while, as pointed out at the U.S. Department of Transportation website, others who could drive choose not to, or limit their driving times for reasons of safety and public ethics.

Here in Davis, Decker and his team are communicating with a developer on the design of environment-friendly set-aside low-income, supportive apartments for adults diagnosed with *ID/DD* at the Shriners Property.

So, I again call your attention to the Transportation Department statistics that reveal **drivers with disabilities drive less than those without them**.

Therefore, instead of driving, it is reasonable to expect that residents of the special units dedicated to adults with *ID/DD* at the Shriners property, will rely upon:

- Bicycling,
- Walking,
- [Davis Community Transit](#) program and/or Unitrans,
- Being included in carpools when transported privately to distant destinations.

Fewer drivers means fewer emissions. I hope that the EIR team does further research on my claim that allowing Regional Center to work with stakeholders on funding their *ID/DD-dedicated housing* at Shriners would be good for Air Quality.

So, I argue that improved Air Quality from the non-driving disabled population is a mitigating circumstance to offset agricultural, biological and other factors.

**2.** Neighborhoods with fewer drivers have less **Noise**. This constitutes another mitigating circumstance.

**3.** To which, you might logically reply that there are alternative settings to construct housing for adults with *ID/DD*.

Yes, Shriners is only the beginning!!

But the word “alternative” creates what, from the *ID/DD*-allied subcultural point of view, constitutes a nonsequitur. Rather, those other potential construction settings are not so much “alternatives” as they will become someday “additions” to the models we hope to commence on the Shriners property. In future, we will need any and all available land to include some *ID/DD-dedicated housing* if we are to meet the new ADA, Lanterman Act, and other inclusive standards of our nation’s, our state’s, and our city’s new socially inclusive paradigm. I disagree with those telling me that I’ve “gone overboard” when I say that at all times when planning land use, we must always ask: “*And where will the Regional Center Housing be located?*”.

However, before thinking of those other potential settings, please note that “Shriners” is currently the only property at which an experienced, locally-respected developer is working with John Decker’s team of the Alta California Regional Center, with those families representing clients whose functional limitations prevent their participation in discussion, and with those few adult Regional Center clients whose IQ’s and verbal abilities allow them to speak on designing specialized low income supportive living arrangements for adults with *ID/DD*. We must act quickly in constructing this housing so as to prevent homelessness or institutionalization because parent-caregivers of Regional Center clients are aging. Without such specialized, inclusive housing, your Davis neighbors with *ID/DD* will see the resumption of our unfortunate historical tradition of segregating them into inappropriate settings in state-run institutions miles away when their caregivers die.

On the CEQA list, this second issue therefore relates to “**Population/ Housing**’, “**Land Use/ Planning**”. I also consider that making amends for nearly two centuries of exclusion in faraway counties due to the lack of local appropriate housing constitutes a very well-justified **Mitigating Circumstance** that offsets other issues.

With all this said, I am also quite committed to building a healthy, climate-safe biologically balanced future for generations to come.

Many thanks, Ms. Dungworth, for your heartfelt dedication and service to the community of Davis,

Mary Nisson

Davis resident

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**Ex-officio Member**

Yolo County **Aging and Adult Service** Commission's *Task Force for Aging Caregivers of Adults with ID/DD*



## Dara Dungworth

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**From:** Tamara Range <trange@summitfunding.net>  
**Sent:** Wednesday, July 17, 2024 7:55 AM  
**To:** Dara Dungworth  
**Cc:** cambriaca@yahoo.com  
**Subject:** PUBLIC COMMENT - Shriners Project Notice of Preparation

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

Ms. Dungworth,

I am a mother of an adult son with Autism. I am unable to attend the Scoping Meeting on 7/25 but would like my thoughts to be heard.

It is crucial to myself and my family that my son have a place to live that will meet his needs **locally!** My husband and I are older parents and want to be sure that he is set up for independence in our lifetime. The best way to insure that happens is to set him up with a living space that is near us and his other local family member to that we may all check in on him.

Part of his ability to be independent is providing a living space that is will promote his health and well-being – someplace like Shriners that could have IDD housing and might have a gym and an inclusive park and a coffee shop where he might be able to congregate with other like minded individuals.

My son deserves to live a full inclusive life! He deserves to be able to live close to his other family members. He deserves to stay in the community he was raised in all his life – the only community he is familiar with. He deserves to be cared for as much as my neurotypical daughters are. I want him to have the same opportunities they have and he deserves them!

In closing, the Shriners community is very important to so many families here locally. We appreciate the City Councils approval move forward last week and know that our Davis community will do what we need to do to take care of our beloved individuals with disabilities.

Most Truly,  
Tamara Range



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# Shriner's Project Environmental Review To City of Davis

Comments from David J Thompson, 516 Rutgers Drive, Davis, CA 95616  
[dthompcoop@aol.com](mailto:dthompcoop@aol.com) 530-400-9765

The plan proposed by Shriners is an unnecessary global warming project

Not planned as a future energy and climate reducing project

Too car-centric

Large Single family homes will attract large % of households who work in Sacramento and outside of Davis

Too old school 1950's suburban proposal for 2030 housing

Not transit friendly

Too few high density units near existing bus routes

Too few rentals to increase bus usage schedule which offers more frequent service to attract more ridership

Too many car trips

Too low density to be climate friendly

Not enough apartments to decrease low-mod households driving into Davis

Not enough low income rentals to lessen low income workers driving into Davis

## Dara Dungworth

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**From:** Jeff Tweddale <jefftweddale@gmail.com>  
**Sent:** Thursday, August 8, 2024 10:59 AM  
**To:** Dara Dungworth  
**Cc:** Kate Tweddale  
**Subject:** Jeff Tweddale Comment on the Shriners Property Project

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

Hello Dara,

We are a long-time Davis family with an 18-yr old son who is an Alta client on the Autism Spectrum. We will fully support the Shriner's Project if it includes the stated goal of "Mutual Housing would also work with Alta Regional on a program where some of the rental units would be made available to individuals with intellectual and developmental disabilities."

I note that the Davis City Council approved language for the Sutter home project (on north side of town next next to Sutter hospital) that sold Davis residents on a ridiculous dream that long term Davis residents would be given **preferential access** to units in that development when it was clear to any casual reading that discriminatory rules like that were going to be un-enforceable. Which is, of course, what happened.

Do not allow this developer to use the vague language "work with Alta Regional on a program where some of the rental units would be made available to individuals with intellectual and developmental disabilities". Rather force them to **allocate a set number of units** for California Regional Center clients with intellectual and developmental disabilities. Make approval contingent on a set number available for a time period, say 2 years, so that if California Regional Center clients (likely discriminating for Alta clients against other California Regional Center clients will be declared discriminatory) don't fulfill the purchase of the units, then the units can revert to other low income program purposes. But give California Regional Center clients a set number of units, for a set time period, to purchase the affordable housing units. If that time period passes and California Regional Center clients don't purchase the allocation of units, then let them revert to low income programs.

It's crucial the City stops using vague language for developers to gain access to an expanded City boundary but not honor their commitments. That the commitments are legally binding and likely to pass legal threats - which will surely come if not written clearly and abled to withstand lawsuits.

Here to assist with any further deal on my comments and support for this project with the goal of providing Regional Center clients an opportunity to live in Davis with dignity.

Thanks in advance,

Jeff Tweddale  
1228 Eureka Ave  
Davis, California 95616  
+1-707-486-1292  
JeffTweddale@gmail.com

## Dara Dungworth

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**From:** Ben Young <benyoung32@gmail.com>  
**Sent:** Wednesday, July 17, 2024 7:28 PM  
**To:** Dara Dungworth  
**Subject:** Shriners Notice of Preparation Public Comment

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

Hello,

I am a UCD student and Davis resident of 4 years. I am excited by this project and admire the effort put into incorporating the new development with existing uses, both urban and agricultural as the site is on the edge of the current city limits. I believe this development will be a boon to the city and will alleviate the extreme pressure of the current housing market. I hope that the EIR and other analysis include the impact this will have on VMT in relation to allowing more UCD affiliates to live in the city. Currently, most UCD staff and many students commute, primarily by single-occupant vehicle, dozens of miles from neighboring cities. This project will allow thousands of Davis workers or students to live biking/bus distance from the university, reducing the total VMT of the city's working population. The working population of Davis is increasing far faster than the current housing supply, as indicated in the current RHNA which mandates zoning for thousands of housing units. I hope the voices of people not fortunate enough to have scooped up Davis housing 40 years ago during the boom era are considered for this project, as this project will have a tremendous impact on people who are currently unable to live where they work.

Thanks,

Ben Young