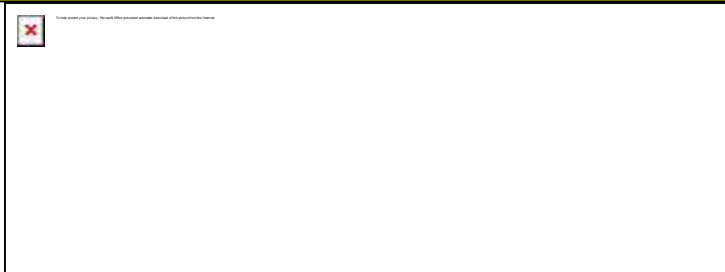


Dara Dungworth

From: Judith Ennis
Sent: Friday, December 8, 2023 4:16 PM
To: Sherri Metzker
Cc: info@daviscan.org
Subject: Davis CAN Comments on the Village Farms Project - No PDF Attached

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



December 8th, 2023
Sherri Metzker
City of Davis Department of Community Development and Sustainability
23 Russell Boulevard, Suite 2
Davis, CA 95616
smetzker@cityofdavis.org

Subject: VILLAGE FARMS DAVIS PROJECT Scoping Comments

Dear Sherri Metzker,

Thank you for the opportunity to provide comments and recommendations regarding the Village Farms Project for Davis. The [Davis Community Action Network \(DCAN\)](#) works at the intersection of climate action and housing affordability. Our mission is to expand access to affordable housing while also addressing our collective need for climate resilience. Therefore, we examined the project with both a housing and environmental lens.

We offer the comments and recommendations presented below to assist City of Davis Staff, City Council, and the Village Farms team in their process revising the design based on community comments and for using the EIR process to identify and/or mitigate the Project's environmental impacts. An ideal final project would be a model for affordable, inclusive neighborhood design that incorporates best practices for climate resilience. Our comments and recommendations are offered in the spirit of reaching the full potential presented by this development for our community. We are excited by this possible expansion of access to housing in Davis and appreciate the opportunity to suggest revisions to ensure housing affordability for a greater diversity of peoples while lowering the impact on the environment.

Please send any requests for clarification to our team at info@daviscan.org.

Regards,
Judy Ennis
DCAN Executive Director
judy.ennis@daviscan.org

PROJECT DESCRIPTION SUMMARY

The Project site is located North of East Covell Boulevard, East of F Street, and West of Pole Line Road, Davis, CA 95616. The Project consists of a mixed-use development community, including a total of 1,800 dwelling units, comprising both affordable and market-rate single- and multi-family residences, across various residential neighborhoods. The proposed project would include neighborhood services; public, semi-public, and educational uses; associated on-site roadway improvements; utility improvements; parks, open space, and greenbelts; and off-site improvements.

There are 300 proposed affordable units, mostly within the high-density portions of the project site plan. A program for down-payment assistance included and “affordable by design” (market rate) units are planned for addressing the need for mid-level housing options. 310 units are planned under the downpayment assistance program and referred to as “starter homes,” but first time home buyer status is not specified nor any income restrictions. A preschool/day care site is included.

COMMENTS AND RECOMMENDATIONS

1. Preserve open space and unique habitat while maintaining 1800 units by increasing density overall and lowering the project footprint. We suggest the EIR analyze the impact of only medium and high density zoning (no low density housing included in the project) without lowering the number of units.

1a: Increase the number of attached dwellings (cottages, townhouses, and similar) overall and increase the number of stacked apartments.

This builds in market-rate affordable designs while also significantly lowering energy consumption, adding to both affordability and climate resilient design. It also increases the potential utilization of public transportation by clustering residences for transit stop placement, thus lowering traffic overall. Tighter clustering and attached dwellings also provide larger contiguous spaces for mature and healthy shade trees that provide cooling canopy. (see 2e)

1b: Ensure that permanent, deed-restricted affordable housing is not reduced in any future design iterations.

The current number of affordable housing units is a step forward for Davis but should be increased within the project. We support the intent of the down payment assistance project but would prefer this funding be contributed to the Housing Trust Fund for purchase anywhere in the city and not within the project. We will not support this project if the number of affordable units is reduced.

1c: Shift the current allotment of open space and the residential project footprint by increasing density along Pole Line road and removing the low density housing zone overlaying the potential vernal pool area (pending EIR results).

1d: The EIR should examine the project’s impact on the presence of a Vernal Pool and related species dependent on that ecosystem. We support a full habitat review and biological inventory of the project site, as expected within a standard EIR process, but with special attention to the potential vernal pool site. We must understand the presence of special status species and habitats and, if present, incorporate their protection and conservation within the design. A footprint shift (1c) would not sacrifice housing units and would also provide protection of unique habitats and protected species, meeting both goals of climate resilience and housing access.

2. Design the neighborhoods for climate resilience pursuing reductions in greenhouse gas emissions from the project by incorporating low-emission construction design, methods, materials, and technologies, and including lower-emission housing types (see 1a).

2a: Incorporate microgrid for all medium and high density sections, with battery storage for all single family dwellings. Alternatively, district thermal or electrical battery storage should be implemented to mitigate GHG emissions by load shifting over the course of the day.

Solar systems are required on new construction, but not storage or microgrid capability. This is an innovation now that will likely be required in the future as technology and affordability of adoption align. Please incorporate this option to increase the affordability of energy costs for future residents across the board and when combined with solar, contribute to climate resilience and lower emissions. ***We suggest the EIR consider the impact of a renewable energy microgrid option due to its capacity to provide local renewable power and significantly reduce emissions.***

2b: Utilize best practices for climate resilient design throughout the project.

We support *net-zero ready* designs and systems. This includes the use of low emissions construction (materials and techniques) as well as other design features that maximize energy efficiency and heat resilience. Envelope air leakage of single family homes should be less than 5 air exchanges per hour at 50 pascals and qualify for the California Energy Commission performance credit. Homes should be outfitted with whole-house fans in addition to heat pumps that meet or exceed latest efficiency standards.

2c: Ensure flood resilience in building design for optimal flood mitigation.

We appreciate the strong flood management already included in the design but due to the current site plan including a significant flood zone, we suggest ensuring flood resilience in building design as well. Consider elevated foundations for buildings in the flood zones and use flood resilient building materials.

2d: Ensure public transit access and pedestrian/bike mobility are prioritized over car-centric design. **We suggest the EIR examines the traffic and emissions impact of a lower car dependent neighborhood design.**

In addition to the current transit options within the project plan ,plan ahead for future expansion of public transit by securing right of way now as necessary for linkages across neighborhoods.

For EVs, include capacity for two-way charging with virtual power plant solutions for private residences and include chargers for public use. We also suggest limiting street parking for any resident with a garage or driveway to ensure streets are for bikes and pedestrians more than car storage.

We support the inclusion of safe bike and pedestrian crossings via over- or underpass across Covell. This avoids conflict with cars to ensure a seamless connection with the local shopping plaza, neighborhood and regional schools and the downtown and campus area. We suggest including narrower, traffic-calming street design for residential streets that invite slower speeds to improve pedestrian and bike safety.

2e: Utilize heat and drought tolerant plant species to plan for the tree canopy and landscaping to lower the heat index on the ground.

A significant tree canopy and native plant landscaping is necessary for heat resilience, water conservation, and public safety. This should be increased throughout the current design.

Summary and Conclusion

The DCAN team looks forward to the next iteration of this project and the results of the completed EIR process. To summarize, our top EIR alternative suggestions are as follows:

- 1.
- 2.
3. Analyze the impact of only medium and high density zoning (no low density housing included
4. in the project) by altering the footprint to avoid habitat area without lowering the number of units.
- 5.
- 6.
- 7.
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- 10.
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- 15.
- 16.
- 17.
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- 19.

We believe the Village Farms project has the potential to expand access to affordable housing in Davis while preserving open space and unique habitat if revisions to the site plan are completed. We look forward to the analysis illustrating the environmental impacts of maintaining 1800 units by increasing density and lowering the project footprint. The best outcomes are possible if the benefits of climate smart design are fully incorporated in the final plans.



December 8th, 2023

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look forward to the analysis illustrating the environmental impacts of maintaining 1800 units by increasing density and lowering the project footprint. The best outcomes are possible if the benefits of climate smart design are fully incorporated in the final plans.

Dara Dungworth

From: holstein@cal.net
Sent: Friday, December 8, 2023 3:17 PM
To: Sherri Metzker
Subject: FW: Comments on last night's Sierra Club meeting

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

it is evident Village Farms supporters are counting on a consulting company they hired as the sole voice on project environmental issues. That is like having the only commentators on climate change being those paid by fossil fuel companies. To mitigate that the following policies are needed:

1. Consulting botanists must be certified by CNPS and crustacean consultants must be certified by the U.S. Fish and Wildlife Service.
2. A financially independent scientific oversight committee must be formed regarding the project.
3. Rare plants documented by Kees Hood in 2023 and then suspiciously destroyed must not be ignored by consultants. To do so would be like poisoning all the birds at a site before doing a bird survey.

These issues are much needed to get an accurate and unbiased environmental assessment of the project.

Thanks,

Glen

Proposed Environmental Sustainability Baseline Features for Village Farms

Submitted by Richard McCann, former Natural Resources Commissioner

December 8, 2023

The City of Davis (City) Natural Resources Commission (NRC) proposed a set for sustainability baseline features for the Davis Innovation and Sustainability Campus (DISC) in 2020 and again in 2022. This list has been edited to account for the differences between a business park and a residential neighborhood, and more recent work conducted by the NRC.

Recommended for inclusion in “Baseline Project Features” submitted for voter approval of the Project pursuant to a Measure D vote

Preface

A key premise of the NRC’s recommendations was that a development project can both avoid investments that will lock in future GHG emissions and save money for residents, businesses and the City in the future. Note that the proposed Baseline Features will likely lower long term project life-cycle costs. For another key Baseline Feature, the costs are simply unbundled and charged to vehicle owners instead of building tenants, thus providing direct financial incentive to vehicle owners to reduce private vehicular use at the project. (City Staff appeared confused about these issues in removing several proposals from the NRC recommendations. Further explanation on these baseline features is included parenthetically.)

Measurement and Verification

To ensure accurate tracking and reporting of achievement of Project sustainability goals and obligations, the Developer will establish a Master Owners Association (MOA) for the Project that reports to the City and is responsible for measurement of, verification of, and assuring compliance with Project sustainability obligations and mitigation measures. The MOA will prepare and submit for City approval a Sustainability and Mitigation Monitoring Reporting Plan. Per the Plan, the MOA will prepare and submit to the City annual reports that describe progress towards meeting sustainability goals and obligations and implementing mitigation measures, including all relevant provisions in the Project’s baseline features. Annual reports will also indicate what actions will be taken in the following year to meet phased actions as part of the sustainability goals and obligations and mitigation measures.

Housing

Housing is included in the Project to maximize environmental benefits of mixed-use development. Specifically, including housing alongside commercial buildings and workplaces encourages walking and biking as commuting options, reduces air-quality impacts, and reduces the Project’s overall carbon

footprint. To further increase the sustainability benefits of onsite housing, the Developer shall commit to the following:

- Overall housing density shall be set at 14 dwelling units per acre (du/ac) to improve energy efficiency and incentivize transit use and foot traffic. [Modified to reflect recent research on appropriate density levels.¹]
- To provide an opportunity for a car-free lifestyle, parking associated with multifamily rental housing will be unbundled. Multifamily rental units will be charged for parking separate from rent.

Energy Efficiency and Usage

The developer shall commit to minimizing carbon emissions by maximizing production of clean energy onsite and ensuring that all Project structures consume 100 percent clean energy. “Clean energy” is defined as energy derived from technologies eligible for California’s Renewables Portfolio Standard (RPS). In addition, the Developer shall commit to the following measures:

- The Project shall meet all CALGreen Tier 1 prerequisites for Residential and Non-Residential buildings in effect at the time of permitting of each phase of the Project.
- The Project shall meet all City of Davis Residential and Commercial Energy Reach Code Standards in effect at the time of permitting of each phase of the Project.
- The Developer shall enter into a purchase and sale agreement with Valley Clean Energy (and/or another electric utility company) for all power produced by the Project in excess of on-site demand. This agreement shall ensure that all power generated but not used onsite is used locally.
- If, after maximizing energy efficiency and on-site production of clean energy, the energy demand of Project structures exceeds the energy produced on-site, then the Developer shall purchase power from solely renewable sources such as Valley Clean Energy’s “UltraGreen” 100 percent renewable and 100 percent carbon-free service (or equivalent) to offset the deficit. This requirement will be continued for the lifetime of the Project by building owners.
- All onsite residential units shall be all-electric (i.e., shall not include natural-gas service).
- All onsite commercial buildings shall be all-electric.
 - (All-electric construction for the building envelope is economically justifiable and is imperative for phasing out natural gas by 2050 to meet the state’s climate goals. The Staff recommended all-electric residential construction for DISC which the Applicant has accepted. This exceeds existing city code which provides an incentive to go all-electric

¹ See “Transit and the ‘D’ Word,” *Access Magazine*, <https://www.accessmagazine.org/spring-2012/transit-d-word/>, Spring 2012.

but does not require it. The NRC asked for a similar approach to the office-type construction in the project. It recognizes that exceptions for manufacturing and other business-related purposes may be needed. Nevertheless, if a residence can be all-electric, the NRC does not see a reason why an office cannot be. All-electric commercial construction can be economically accomplished with equal or lower life-cycle costs than conventional construction. As suggested by the Staff response, state law mandates a cost-effectiveness study before all-electric construction can be required by an ordinance. In this case, however, the requirement would be established by a contract (the Development Agreement) and so it is not apparent that a general cost-effectiveness study is legally required.)

- Prior to beginning construction on each phase of the Project, the Developer shall prepare a report describing plans to incorporate passive heating and cooling strategies into building design so as to reduce overall energy demand. Such strategies may include but are not limited to: construction using thermally massive materials, incorporation of shading devices in the building envelope, strategic building orientation and window placement, and strategic planting of trees and other vegetation. This report shall be subject to review and approval by City staff.
- All onsite buildings (commercial and residential) shall achieve zero net carbon for the building envelope—including heating, ventilation and air conditioning (HVAC), and lighting—with onsite renewables and storage.
- Prior to beginning construction on each phase on the Project, the Developer (and MOA for later phases) shall engage an outside consultant to conduct a solar feasibility assessment for development planned in that phase. The assessment shall identify all appropriate locations for solar photovoltaics (PV) or other future comparable technology, taking into account factors such as structure orientation, grid design, installation cost, and site landscaping. Locations may include but are not limited to rooftops, ground solar arrays, and constructed canopy structures including parking lot shade. The Developer shall implement PV on all recommended locations, up to the extent that Project electricity demands are fully met. Note that this provision is not intended to and shall not substantially interfere with Project requirements for tree canopy.
- The Project shall achieve net-zero energy for outdoor lighting through the use of onsite PV plus battery storage or similar technology.
- In anticipation of improved solar-connected energy storage, the Project shall be designed and pre-wired for future microgrid capacity and energy storage.
 - (Being microgrid-ready means adding conduit to utility pathways so that microgrids can be easily implemented in the future. It is important to realize that this is not a request to for full microgrid installation. By simply installing larger conduits and prepping wiring runs, very little is added to upfront costs and millions of dollars of expenses required to tear up facilities to install the microgrid infrastructure in the future would be avoided.

This is the same rationale as providing purple pipe in anticipation of using reclaimed water in the future. Rejecting this Baseline Feature would functionally support PG&E's wish to continue utility dominance of infrastructure design to the detriment of the City's long term climate and resiliency goals.)

Transportation Demand Management

The Project will need to implement a comprehensive set of design features and Transportation Demand Management (TDM) strategies intended to reduce vehicle trips and vehicle miles traveled (and therefore greenhouse gas emissions), encourage the use of alternative transportation modes such as walking, bicycling, micromobility, public and private transit, and ridehailing/pooling, and provide safe infrastructure for bicyclists and pedestrians. The desired outcomes of a TDM Plan shall be to reduce greenhouse gas (GHG) emissions and transportation total carbon footprint through a reduction of the Project's vehicle miles traveled (VMT). A key strategy should be shifting away from single occupancy vehicle (SOV) use by incentivizing a mode shift to walking, bicycling, public transit, private transit, and/or 3+ carpool.

A designated TDM manager shall be identified for the Project. The TDM manager shall represent the Developer, MOA, or other equivalent Project-related body, and shall report directly to the City.

- Prior to, or concurrent with, adoption of Final Development Agreement, the Developer shall create a TDM plan that includes quantitative goals and temporal benchmarks for shifting away from single-/low occupancy vehicle use. The TDM plan shall also include metrics for assessing progress towards these goals and benchmarks. Responsibility for this task shall reside with the designated TDM manager.
- The TDM plan shall include actions that will result in a reduction of GHG emissions consistent with the City's then current Climate Action and Adaptation Plan (CAAP) and the goal of the City Council to achieve carbon neutrality by 2040. Subsequent phases of the Project shall not be permitted for construction unless the GHG-driven benchmarks for the previous phase of the Project are met.
 - The TDM manager shall coordinate implementation of the Project's TDM strategies with UC Davis to ensure that relevant efforts by both parties are aligned and allow for cooperative ventures where appropriate.
 - Prior to the commencement of construction of each phase of the Project, the Developer/MOA shall commission a traffic study which measures in- and out-flow from the Project and identifies traffic patterns. This analysis will be shared with the City to determine which traffic mitigation measures are necessary beyond those specified later in this document. This analysis will also inform the City on mode share and the potential need for increased public transit services.
 - The Developer/MOA shall review and update the TDM Plan every two years. The TDM Plan update shall include results of a travel behaviors survey, to be completed annually

by the Developer/MOA. The annual survey shall include the travel behaviors of Project residents and employees (e.g., where employees live and by what mode they get to and from work; where residents work and by what mode they get to and from home). The updated TDM Plan, including survey results, shall be made publicly available.

- Prior to Phase 1, the Developer and the City shall agree upon a process for monitoring and evaluating TDM goals on an annual basis, modeled on the process detailed in the Nishi Gateway Project Sustainability Implementation Plan (2015). This monitoring and evaluation process will include an Annual Report, to be transmitted to the City, which details progress towards the actions outlined in the TDM plan and specification of actions required when TDM goals are not met. *(It should be noted that vehicle trip monitoring in the Nishi SIP is a surrogate for transportation GHG emissions, while modeling to estimate actual GHG emissions is preferred.)*

The Project shall include the following features, in addition to features identified by the TDM Plan, to encourage a shift to alternative transportation modes, such as walking, bicycling, micromobility, public and private transit, and ridehailing/pooling:

- The Project shall be designed to accommodate and incentivize private transit, local transit (Unitrans), and regional transit (Yolobus) through the following measures:
- The Project shall include a central transit plaza to serve as the hub for a variety of mode shares.
- The Project shall include transit stops located throughout site to ease pedestrian access such that no transit stop is further than 400 meters from any occupied building.
- The Developer shall petition Yolobus and Unitrans to increase the frequency and capacity of bus service to the central transit plaza as the Project develops. The Developer shall provide funding, if necessary, to the transit services to implement the change.
- Phase 2 cannot commence until after the implementation of an on-demand electric transit to and from UCD and scheduled electric transit to and from the Amtrak/Capital Corridor station running weekdays including the AM to PM peak commute periods.
- To promote transit use, the MOA shall provide upon request free passes for local and regional transit service (e.g., a unlimited access pass similar to Yolobus and Unitrans' pass for UC Davis undergraduates) to the Project's residents and employees.
- The Project shall include parking to accommodate single-occupancy vehicles (SOVs) and carpool vehicles while also incentivizing other modes of transportation:
- As part of the TDM plan, the Developer will determine the appropriate number of parking stalls, which may be fewer than City parking minimums. Commercial parking requirements shall be determined by the TDM plan. For residential development no more than one stall per residential unit shall be provided onsite.

- All employers shall create through the MOA or participate in a regional carpool program that is modeled after and functionally equivalent to the UC Davis goClub carpool program. The program shall be open to all Project residents and employees.
- Carshare and preferential carpool spaces shall be provided, with the number of appropriate stalls to be specified in the TDM plan.
- Parking costs shall be unbundled from the cost of other goods and services. A separate fee shall be charged for all parking spaces (commercial and residential).
 - (Charging for parking is a key mechanism for incentivizing vehicular users to use alternative transportation modes. It will be an important element of the Transportation Demand Management plans that are required for the Project. Staff has claimed that the market won't support a parking charge. It appears, however, that the Staff may be inappropriately applying market studies for public parking in the downtown. UCD charges for parking all over campus, as does other large employers such as Sacramento State and the State of California. Again, it is important to note that probably three-quarters of the anticipated GHG emissions are associated with transportation.)
- Parking cash-out programs shall be offered by any employer who provides a parking subsidy to employees, to give employees who do not drive a cash benefit equivalent to the value of the offered parking subsidy. The MOA shall be in charge of ensuring that employers comply with this program and shall record participation in the Annual Report.
- The Developer shall provide bicycle facilities and infrastructure comparable to the City's Platinum-level Bicycle Friendly Community Certification to support bicycling within and to the site, including the following features:
 - Provide short term bicycle parking, as required by Davis Municipal Code.
 - Provide end-of-commute facilities (showers, lockers, changing rooms) and support electric bicycle charging in all commercial buildings.
 - Provide covered and secured long-term bicycle parking at central locations within the site and at the central transit hub.
 - Provide community bicycle repair facilities.
 - The MOA shall implement a bicycle share program including electric-assist bicycles for employees and residents to use on and off the Project site.
 - A bicycle network of Class IV protected cycle tracks shall connect bicyclists to all areas of the site and all key connecting streets/facilities.
 - The Developer shall provide accessible sidewalks that facilitate pedestrian access within and to the site, including the following features:

- All pedestrian access routes shall be readily accessible by all users, particularly individuals with disabilities. Street design should emphasize universal design through use of appropriate width, grade, surface material, tactile cues, audible cues, and push buttons. The Developer shall reference the United States Access Board Proposed Guidelines for Pedestrian Facilities in the Public Right-of-Way (PROWAG), or other appropriate reference.

Site Access and Traffic Mitigation Features

The following measures are recommended to improve site access and mitigate traffic impacts of the Project. The Developer shall fund infrastructure to mitigate traffic problems attributable to the project either wholly, where the problem is mainly caused by the Project, or proportionately, for traffic improvement measures where the Project is a partial contributor to the problem. The intent is to avoid subsidization of the Project by the City providing funding for traffic mitigation measures.

As described below, City approvals will not be granted for different phases of the Project until public and private funding are budgeted and available, and regulatory approvals have been granted. In other words, all obstacles to the start of construction have been removed.

The desired outcomes of traffic-mitigation measures are to reduce the transportation total carbon footprint and adverse level of service (LOS) traffic impacts on roads in the Project vicinity.

- Phase 1 shall not proceed until public and private funding are budgeted and available and regulatory approvals have been granted for construction or implementation of all other mitigation measures a Transportation Impact Analysis.
- The Developer shall contribute funding to the City to study and implement bus rapid (BRT) transit strategies, including a bus signal preemption system for freeway access or local traffic bypass.

Parking Lots and Internal Streets

The desired outcomes of design features for the Project’s parking lots and internal streets shall be to: (1) encourage a mode shift from Single Occupancy Vehicles (SOVs) to walking, bicycling, public transit, private transit, ridesharing, carsharing, carpooling, and/or micromobility; (2) encourage use of zero-emission vehicles (e.g., electric vehicles) where SOV use is necessary as well as in any alternative transportation service that relies on passenger vehicles; (3) reduce runoff and heat-island effects amplified by parking lots; and (4) reduce adverse visual, aesthetic, and quality-of-life impacts of working and living near parking lots. To further these desired outcomes, the developer shall implement the following features in its parking areas and/or along the Project’s internal roadway system:

- Low-impact development (LID) features, such as bioswales and permeable pavement, shall be implemented in all streets and surface-level parking to capture and filter runoff and maximize groundwater recharge.
- Landscaping shall provide 80 percent shading of pedestrian walkways and off-street bike paths. At least 50 percent parking-lot shading shall be achieved through either shade trees or PV arrays. Compliance with these requirements shall be demonstrated at the time of building by

securing permits for adequate PV arrays and/or by consulting with a certified arborist on a tree-planting and -maintenance strategy expected to achieve the desired shading area within 15 years of planting. Failure to meet shading requirements shall be considered a code violation and subject to penalty until remedied. Progress towards meeting the shading requirement shall be included in each Annual Report.

- Where feasible, all multi-user parking shall be shaded by solar PV structures. In addition, those structures shall be wired to accommodate direct service electric vehicle (EV) charging. [This element is modified to reflect the deliberations and draft recommendations from the 2x2 NRC / Tree Commission Parking Lot Shade Committee.]
- All parking surfaces or street-adjacent sidewalks that use tree shading shall incorporate structured soil or suspended substrate to allow successful tree-root development. The developer shall size the area of each pavement-treatment site to accommodate the maximum size of a tree that could reasonably be accommodated on that site
- Parking preference and priority shall be given to electric vehicles (EVs) and to vehicles participating in a carpool program. Only carpool and EV parking shall be allowed adjacent to commercial buildings in spots not designated for disabled persons. Spots designated for disabled persons shall not be restricted to particular vehicle types.
- All stalls designated for EVs shall have charging stations pre-installed. Stations shall include a mix of free Level 1 charging and paid Level 2 charging.
- All commercial and residential parking areas shall be EV ready, equipped with infrastructure designed to facilitate installation of EV charging stations as demand grows. This infrastructure will include electrical panels, conduit/raceways, overprotection devices, wires, and pull boxes and will be designed to support vehicle-grid integration. On-site demand for EV charging shall be reported in each year's Annual Report.
 - (Installing wiring and conduit during initial construction will facilitate the expansion of EV charging infrastructure in the future as demand grows. Again, this is not a request to install EV charging stations at every parking slot, only to make every slot EV ready. Installation of the wiring necessary to make parking EV ready will facilitate access by EV users and save millions of dollars in the future that would otherwise be required for retrofitting parking. At some point in the future, microgrid and EV charging facilities can be integrated to run our houses and offices off the storage batteries in cars.)
- All housing shall include one Level 2 EV charger per unit or, if a multifamily building is provided parking at a ratio of less than 1:1, one Level 2 EV charger per parking stall. Townhomes, if built to accommodate two vehicles, will be prewired to allow for the installation of a second charger.
- All commercial parking for non-electric SOVs shall be paid parking. To encourage occasional bus use, no discounts for monthly parking versus daily parking will be allowed.

- The Project shall be exempt from parking minimums otherwise required by the City for new development. Specifically, the minimum number of parking spots necessary for the Project shall be informed by the Project's TDM plan rather than general minimum parking requirements.

Landscaping and Water Conservation

To reduce Project demand on groundwater and potable water and to provide appropriate habitat for native species, the developer shall commit to the following measures:

- All Project landscaping shall be adapted for climate change, drought resistant, pollinator friendly, and maintained organically.
- Native and drought-tolerant plants shall predominate the plant palette. A diversity of native habitats— including but not limited to riparian and California oak savanna—shall be maintained throughout the Project site, primarily but not exclusively within the agricultural buffer and along the drainage channel.
- Turf shall be used only in areas (such as a central community center or organized sports fields) programmed for activities that require turf.
- The Developer shall engage with the Center for Land Based Learning, the UC Davis Arboretum, or other local expert(s) to design and manage its open and landscaped buffer areas. Landscape plans shall be subject to City review, including review by the Open Space and Habitat Commission and the Tree Commission.
- Consistent with the City's stormwater permit and regulations, stormwater runoff shall be captured, conveyed, and detained onsite in a series of bioretention facilities and similar devices intended to filter the runoff, maximize groundwater recharge, and provide deep watering for onsite vegetation.
- To prevent flooding of the channel, stormwater flows shall be retained onsite using swales, ponds, or other appropriate facilities, consistent with City stormwater regulations and system capacity. Stormwater facilities necessary to meet these regulations must be located on-site or on another privately-owned property incorporated within City boundaries. The stormwater facilities should be sized following a joint hydrological investigation with the City.
- The Developer shall install infrastructure suitable for conveying non-potable water to meet all landscape irrigation demands. The Developer shall convert this system to reclaimed/greywater water if and when such service is made available.
- All greywater shall be reused onsite where practical and permissible. The Developer shall install infrastructure (including two-way valves and piping) to support use of greywater from laundry facilities in all townhomes. The Developer shall also identify opportunities for using greywater in multi-family housing and commercial buildings and shall install infrastructure needed to pursue such opportunities. The MOA shall review proposed uses of greywater to prevent

pollution. The MOA may require owners to revisit/update proposed plans for greywater reuse in the future, and may require installation of additional infrastructure as appropriate.

Recycling and Waste Disposal

- All buildings and facilities shall participate in a mandatory, site-wide recycling and compost program to be managed by the MOA. Building maintenance staff will be trained in best practices for maximizing commercial recycling.
- All common areas that include disposal options managed by the MOA shall include solid-waste disposal cans, recycling cans, and compost bins.

Mitigation Measures

The project shall comply with and ensure public or private funding and completion within a two-year period for all Mitigation Measures identified in the Approved Mitigation, Monitoring, and Reporting Plan.

Implementation

Concurrent with the approval of a Final Planned Development and Site Plan and Architectural Review for any structure located at the project site, a Sustainability Implementation Plan shall be developed and implemented to ensure compliance with the Environmental Sustainability Baseline Features to the satisfaction of the City.

Regarding the Notice of Preparation (NOP) and the upcoming preparation of a Draft Environmental Impact Report (DEIR) for the “Village Farms” project.

Landfills, Leachate, and PFAS chemical impact on public health, eco-systems, and wildlife

The scope of work for the Village Farms EIR needs to include:

1. Renew monitoring of seven wells on the Village Farms site, and the “old” city landfill site and sewage treatment plant site.
2. More monitoring wells need to be added and located throughout these sites, as well as on the mitigation land to the west of the old landfill site.
3. Monitoring the agricultural wells on the site for toxics and other contaminants including PFAS chemicals.
4. Include specific sampling and testing of PFAS chemicals per the California Water Board requirements. The city has a duty to identify the presence of these highly toxic PFAS contaminants by type and quantity and report them to the public.
5. The Old City landfill and sewage plant have a long history of toxics and other contaminants. There is concern that the groundwater could be contaminated by the leachate from the Old City Landfill and Sewage treatment plant to contaminate the Village Farms groundwater, as well as the aquifers and agricultural and non-agricultural wells, stormwater, and other drainage water that flows to the wetlands east of Davis. This is well-reported in other communities across the country.

This is a public health and safety issue that could result in legal and financial liability for the City. PFAS contamination can seriously impact habitat and wildlife on and around Village Farms and the wetlands that are part of the Pacific Flyway. PFAS and other environmental contaminants should be thoroughly monitored, sampled, analyzed and reported to the public as soon as available.

BACKGROUND: PFAS in LEACHATE

Per- and Polyfluoroalkyl Substances (PFAS), known as “forever chemicals” are a group of over 12,000-plus man-made variants of toxic contaminants used in a wide variety of products to make them resistant to water, oil, grease, stains and heat. PFAS travel through air, water, soil, occur in dust and the food chain.

Complex mixtures of contaminants, posing concerns for both human and ecosystem health, are found in leachate. Over decades, PFAS are increasingly detected in leachate because of the increasing prevalence of consumer products manufactured with PFAS, or PFAS substitutes found to be equally harmful, and discarded in landfills, each type degrading at a different rate.

Because of their persistence and mobility, PFAS can be in the leachate that seeps out from old historical unlined, and older and newer active landfills with leaking lining systems. Landfill leachate, formed through the percolation of precipitation through solid waste and the downward migration of liquid waste, is a byproduct of this disposal process in landfills.

Consequently, PFAS will be identified in both ground and surface water sources below and adjacent to the landfill and that carry the PFAS contamination further into adjacent areas and waterways. This is one source of contamination of drinking water and bottled water.

For over a decade, PFAS, PFSA's and PFCAs, such as PFOS and PFOA, and their precursors, have attracted the most attention as contaminants of concern.

PFOA and PFOS, have been phased out of US production, but continue to be found in eco-systems, the food chain and in our bodies: in breast milk of 100% of women tested, the umbilical cord and placenta, and in almost everyone's blood, including neonates. PFAS are carcinogenic; there is a range of serious health and life-threatening impacts specific to women, men and children.

In the United States, landfill leachate is primarily discharged to sewer infrastructure for co-treatment in wastewater treatment plants. This is not very effective as two types of PFAS, PFOA and PFOS can be resistant to municipal wastewater treatment. This has resulted that sludge from wastewater treatment plants processed and sold as a crop and garden amendment is still contaminated with PFAS.

PFAS has been consistently measured in landfills across New York, Minnesota, and Vermont; waste managers have few options now but depositing PFAS-contaminated materials in these landfills, a practice that needs much further documentation and study in other states, including California and Davis.

Federal Environmental Protection Agency PFAS in landfill leachate Program

In EPA's [Effluent Guidelines Program Plan](#) published in January 2023, EPA outlined their plan for dealing with PFAS in landfill leachate. EPA evaluated discharge data from over 200 landfills from across the country and found PFAS present in the leachate at over 95 percent of the landfills.

PFAS detections included 63 different PFAS with average concentrations for an individual compound as high as 14,000 parts-per-trillion. EPA intends to revise the existing Landfills Point Source Category (40 CFR part 445) ELG to address PFAS discharge from these landfills pending resource availability. Once EPA develops the schedule for this rulemaking, it will be published in EPA's Regulatory Agenda.

EPA Newly Proposed EPA Drinking Water Standards for PFAS

Finally, the EPA is taking seriously the need to regulate PFAS in drinking water, but this comes after decades of knowing the health and ecosystem impacts and turning a blind eye. EPA will be proposing an enforceable limit on a combination of PFOA, PFOS, PFNA, PFHx's, PFBS, and GenX Chemicals. The proposed rule would place limits on any mixture containing one or more of these chemicals. For these PFAS, water systems would use a Hazard Index approach to protect communities from the additive effects of multiple PFAS when they occur with monitoring, public notification, and treatment.

The EPA is also proposing an enforceable Maximum Contaminant Level (MCL) for PFOA and PFOS. And to regulate PFOA and PFOS at a level that can be reliably measured, which is .04 parts per trillion (ppt) for PFOA and .02 for PFOA. EPA's 2016 recommendation was 70 ppt for PFOA or PFOS individually or in combination.

PFAS Remediation Systems

Certain technologies have been found to remove PFAS from drinking water, especially PFOA and PFOS. These technologies include: activated carbon absorption, ion exchange resins, and high-pressure membranes, such as nanofiltration or reverse osmosis. These can be used in drinking water treatment facilities, in water systems in hospitals or individual buildings, or in homes at the point-of-entry- into the home or point of use in the home.

All these systems require a cartridge, filter, or item that contains the collected PFAS and which must be disposed of and replaced with a new cartridge or filter. PFAS is not destroyed; it is just moved to a landfill or somewhere else.

<https://www.epa.gov/sciencematters/reducing-pfas-drinking-water-treatment-technologies>

Recent Information on PFAS and Landfills: 2020 - 2023

One example: Minnesota Pollution Control Agency Study of Landfills. [PFAS and Closed Landfills](#)

Brief Summary: A few of the most studied PFAS are known to be hazardous to human health. Since PFAS contamination was detected in drinking water in the eastern Twin Cities in the early 2000s, the chemicals have been found in water, sediment, soil, and fish all across Minnesota.

The MPCA tested for PFAS in groundwater at 102 of the 111 sites in the Closed Landfill Program:

- PFAS were detected at 100 landfills.
- At 62 landfills, PFAS levels exceeded Minnesota Department of Health drinking water guidance values.
- 98% of assessed closed landfills have PFAS contamination. The map shows Closed Landfill Program sites in Minnesota and the level of PFAS found at each site labeled. PFAS was detected at 100 of the landfills. At 62 of the landfills PFAS levels exceeded health standards and PFAS levels were 10 times above health standards at 16 landfills.

Additional recent studies and reports:

[New Yorkers should not have to worry about water contaminated by our landfills](#)

Laura Orlando, Press Connects, 4/20/23

[EPA proposes further leachate regulations after study finds PFAS at 95% of surveyed landfills](#)

Megan Quinn, Waste Dive, 1/24/23

[Effluent Guidelines Program Plan 15 — Landfills Point Source Category](#)

EPA, January 2023

[Ten Bad Things We Do With PFAS Waste](#)

Sonya Lunder and Denise Trabbic-Pointer, Sierra Club, 6/27/22

[PFAS Issues Facing Landfills](#)

Stephen Zemba, Sanborn Head, 5/27/22

[Landfill leachate contributes per-/poly-fluoroalkyl substances \(PFAS\) and pharmaceuticals to municipal wastewater](#)

Jason R Masoner, March 13, 2020

Some landfills will begin treating PFAS on-site as regulators move to adopt new limits

April Reese, January 17, 2023

Tracking PFAS developments in 2022 and beyond, Dec. 22, 2022, Updated Aug. 17, 2023

Thank you and look forward to your EIR Study

Nancy Price, 1223 Sequoia Place, Davis, CA 95616

If you have questions and would like to contact me: my mobile phone is: 530-402-5804

Dec. 8, 2023

Dear Ms. Metzker,

I am writing in regard to many concerns about the Village Farms project proposal and want to point out issues that need covered in the Village Farms EIR.

1) First and foremost, a reduced project alternative, which was the Environmentally Superior alternative, needs to be added as an alternative, similar to the Covell Village project with a few modifications. (see attached image.)

This 250-acre reduced project alternative needs to be added to the DEIR, which would be to develop the land below the channel only, but modified by protecting the 32 acres of vernal pools which would allow the remaining 218 acres to be developed, with 900 - 1,000 housing units. The land above the channel, where the majority of the 200-acre flood plain is, would remain a combination of agriculture (for required ag mitigation land) and open space with habitat preservation. I have attached a graphic to illustrate this alternative that is needed in the EIR. This Environmentally Superior alternative needs to be added to the Draft EIR since basically the EIR alternatives per CEQA are supposed to have *lesser impacts, not equal or more impacts*. Therefore, the current alternatives are *not* meeting that objective and are disingenuous at best for a legitimate Draft EIR analysis.

Please see the attached image for reference illustrating this needed reduced project alternative for the EIR alternatives to be added which is reduced in land size and in the number of housing units to 900-1,000 on 218 acres, and preserving the 32 acres of vernal pools. The reduced number of units is necessary due to the current enormous traffic and circulation impacts cannot possibly tolerate more than 900 - 1,000 units at the Covell and Pole Line Rd. intersection and surrounding streets. Even the air quality would be seriously deteriorated as was explained in the Covell Village DEIR in addition to the lack of safety, particularly for pedestrians and bicyclists, particularly children traveling on or across Covell Blvd. or Pole Line Rd. Further, it is the Environmentally Superior alternative since it would have the least environmental impacts, so it is the best project plan for the Village Farms site.

It is common knowledge that CEQA states that EIR's are to have alternatives with *lesser impacts, not equal or more impacts*. The current EIR has 2 variations of 1,800 (one on 250 acres, and 135 acres) and one would be more than 1,800 (undefined at this point) on 390 acres, and a 1,395-unit proposal on 390 acres. Therefore, these alternatives are inconsistent with CEQA's intentions, and disingenuous at best.

Further, trying to cram 1,800 units on 135 acres is absurd. The City needs to explain first how such a project could possibly be designed feasibly, to be consistent with the General Plan? It would seem to need to be predominantly high-rises, and how would greenbelts or park space possibly be shoe-horned in? These 1,800 housing units on 135 acres alternative is unreasonable alternative needs to be eliminated and the modified reduced alternative as described above of 900 -

1,000 units on 218 acres below the channel, preserving the 32 acres of vernal pools needs to be substituted.

All of the 1,800 variations of the project, as well as the 1,395-unit project alternative need to be eliminated since none of them make any sense due to the traffic impacts which would create gridlock. They need to be replaced with far smaller housing unit alternatives and only developing below the channel preserving the vernal pools, and not any development of the land north of the channel which is roughly 200 acres of 100-year flood plain. These northern 200-acre of the project site would distance the residential from the former City unlined landfill and sewage plant with its history of leakage of toxics and contaminants (and potential PFAS chemicals) would remain a combination of agriculture (for required ag mitigation land), as well as open space with habitat preservation.

More Village Farms project proposal issues to be studied in the EIR, but not limited to:

2) The traffic at the Covell Blvd. and Pole Line Rd. area is already overwhelmingly impacted, particularly due to significant traffic from Woodland including Spring Lake. How can Covell Blvd. and Pole Line Road, including the Covell Blvd. and Pole Line Road intersection, and the surrounding streets possibly handle traffic from 1,395 or 1,800 or more housing units? Even the traffic studies Covell Village EIR in 2005 revealed that “*the subdivision would degrade Covell Blvd., Pole Line Rd. and other streets to Level of Service “F”, defined as “...high delays, high volumes and extensive queuing. Conditions are intolerable for most drivers.*” Covell Blvd. would almost double to 39,440 cars per day and Pole Line Road would more than double to 26,900 cars per day.”

Traffic counts need to be done when UCD school is in session (particularly during the Fall session) and not at summer or other vacation breaks times when there are far fewer students and other non-student residents are not in Davis. Also, rush hours traffic counts need to be used in the EIR as well.

3) Three roundabouts (Moore, Donner and Picasso) on Pole line being proposed on Pole Line are *absurd*. Pole Line is not wide enough to accommodate the huge volume cars that typically are traveling on Pole line Rd., as they would be backed up trying to circle in small roundabouts. How would pedestrians and bicyclists cross these roundabouts? Wouldn't traffic lights be needed as well for the roundabouts because of the back-up and need for pedestrians and bicyclist needing to cross Pole Line Rd.? Also, who would pay for the roundabouts as well as the traffic lights? It would be like installing roundabouts on I-80. This is not a small neighborhood situation; Pole Line Rd. is a major arterial which is already on overload. These suggested roundabouts *cannot* possibly work and would just create a huge traffic back up.

4) There is no safe access across Covell Blvd., because of all the existing development you simply can't go over, or under Covell Blvd. for a grade-separated crossing. The absence of a grade-separated crossing would be dangerous for pedestrians and bicyclists, particularly children because Covell Blvd. is so heavily trafficked with very fast-moving cars.

- 5) The developer has not clarified *who* is paying for the massive and expensive infrastructure needs proposed such as: 1) the Pole Line bike/pedestrian overpass proposed, 2) the three roundabouts, 3) the fire station and other services proposed near the proposed new fire station, and 4) is there to be a bike/ped overcrossing over F St.?
- 6) The project claims to connect the North Davis bike paths but there is no bike/ped connection in the plan across F St. Since there are railroad tracks running parallel to F St. what is the plan to fulfill this claim to connect the bike paths in North Davis? Does the developer have permission for access across the railroad tracks from the railroad company owners for such a crossing, and if so, where would it be and who is going to pay for it?
- 7) Village Farms has enormous 200-acre 100-year flood plain. A basic planning principle is that you *do not* build on large flood plains (i.e., like Natomas did, which flooded). Plus, the State has approved policy that it will *no longer* financially bail out cities which are foolish enough to build on large flood plains when they flood. (Note: El Nino is coming this year.) Therefore, the Village Farms project should *not* be building on the enormous 200-acre flood plain, the majority of which is above the channel. Instead, the project needs to include the reduced project alternative described in point #1. CEQA requires close examination of any flood plain impacts on a project and this flood plain is *enormous* taking up half of the project site.
- 8) The Village Farms site has a history of toxics and other contaminants leakage from the adjacent former City *unlined* landfill and sewage treatment plant. Only 7 wells have been monitored on the north-east vicinity of the project where it borders with the former City unlined landfill and usually only one or twice a year since the early 1990's. No monitoring has been done since 2020. Further, no testing has been done for PFAS "forever chemicals". This needs to be done and more testing of the west end of the Old City Landfill site where the ground water retention basins are currently planned to be located.

It is inexcusable that inadequate testing has been done for toxics and other contaminants including PFAS chemicals and more wells. Far more testing is needed and adding more monitoring wells is needed at *various locations* on the Village Farms site and its mitigation land to the immediate north of the project, as well as the Old City Landfill and Sewage treatment plant since this is a combined total of at least 600 acres. In particular, the agricultural mitigation land immediately west of the former landfill site needs to be tested as well as the former landfill itself in that area since they never been tested and groundwater re-capture basins are planned for this "ag mitigation" land immediately to the west of the landfill.

Regarding adding more monitoring wells, these additional wells need to be spread out on the Village Farms site in the south, east, west and central areas since this is such a huge parcel at 390-acres. Only the north-east areas have had any groundwater monitoring done. In addition, all of the agricultural wells on the Village Farms site, and if there are any commercial/agricultural wells on the Old City Landfill and Sewage treatment plant need to also be tested for toxins and other contaminants including per-and polyfluoroalkyl substances (PFAS).

- 9) The stormwater drainage which drains to the east eventually winds up the wetlands to the east of Davis. It is of concern that any toxics and other contaminants including PFAS chemicals from

the Old City Landfill run off could wind up contaminating our wetlands to the east of Davis and could potentially destroy wildlife and other habitat. This is a critical issue because those wetlands are part of the Pacific Flyway.

10) A relevant question is how can housing be allowed to be located so close to a former *unlined* landfill with a history of toxics and other chemical leakage issues? Isn't a minimum of a 1,000-foot buffer required for residential from the former City unlined landfill and former sewage plant?

11) Methane needs to be tested for on the Old City Landfill site since it is a potential dangerous emitted particularly from old landfill sites.

12) Are the water re-charge retention basins in any way connected to, or involved with flood control and the drainage system or involved in flood control? If so, these water recharge retention basins are proposed to be located *off-site*, but flood control and drainage system are supposed to be located *on-site*. Also, they are being locate near the former City *unlined* landfill and sewage plant which has had a history of toxics and contaminants leakage issues.

13) Further, a major high -pressure P,G & E pipeline runs north-south though the project site and appears to go under the area where these water recharge basins are to be located.

14) It is important to note that these water retention basins are *not* entitled to be counted as ag mitigation, and any assumption by the developer for this ag mitigation credit is not realistic.

15) A new fire station being proposed would cost Davis residents \$14 million, *just to build it*, and that *does not* include staffing or operational costs. Plus, we *do not need* a new fire station because 90% of the fire dept calls are medical, *not* fire calls. Instead, we could use an Emergency Medical Service (EMS) station which would cost a fraction of the cost. Also, how would a fire truck possibly get onto Covell Blvd. and turn, or get through the backed-up traffic? The Fire Station concept needs to be eliminated and replaced with an EMS station but it needs to be located in any of several other possible locations in East Davis, *not* on Village Farms. The location on Village Farms, which is in a seriously impacted section of Covell Blvd. makes no sense for any emergency service due to the chronic traffic back-ups which would delay getting any emergency service to their calls.

16) The project needs to preserve the 32-acres of the vernal pools located just south of the channel in the north-west corner vicinity and the habitat along the channel.

17) Consulting botanists doing any of the biological resources surveying and reporting must be certified by CNPS and crustacean consultants must be certified by the U.S. Fish and Wildlife Service.

18) A financially independent scientific oversight committee must be formed regarding the project.

19) Rare plants on the Village Farms vernal pools site were documented by Kees Hood in 2023 ,

and two weeks after a public presentation given regarding these vernal pools the vernal pools were disced. The timing of this destructive discing must not be ignored by consultants. The data including the photos from the spring season of 2023 and plant samples need to be included in the EIR biological resources analysis.

20) Also, the channel must not be moved or re-routed because it would cause irreversible and permanent destruction of the rare vernal pools. Also disturbing and re-routing the channel, would also seriously harm the existing habitat that needs to be protected. Re-routing the channel would undoubtedly disrupt water flow also and potentially add to the flooding risk which already exists.

21) The city's main P,G & E high pressure gas line runs north-south through the entire Village Farms project. What is the condition of that pipeline after decades of fertilizer chemicals and irrigation on that pipeline? Does this pipeline run underneath the proposed water detention and recharge basins are proposed to be located? If so, has P,G and E been notified of this and what is their response?

22) How much impact would 1,400 to 1,800 *or more* housing units from this *one* Village Farms project, have on our water supply? What capacity would be used up by this enormous project, and how much capacity would be left?

23) How much impact would 1,400 to 1,800 *or more* housing units from this *one* Village Farms project have on our wastewater treatment capacity? What capacity would be used up by this enormous project, and how much capacity would be left?

24) The California Water Board has informed the City that due to the many concerns about the history of the toxics and other contaminants from the Old City Landfill into the ground water and onto the Village Farms site and that they have opened a Cleanup Program Site Case for toxics and other contaminant discharges to groundwater from the Old Davis Landfill. The Old City landfill and Sewage treatment plant has had a history of toxics and other contaminant leakages into the groundwater that site as well as onto the Village Farms site. There was never a clean-up of the *unlined* old City landfill and sewage treatment plant and *only 7 wells* were installed and monitored in the north-east vicinity of the Old City Landfill/ Sewage treatment plant where it borders the Village Farms site which *was too few a number of monitoring wells* for a roughly 500 600+ acre vicinity of the City land and the adjacent 390 acre Village Farms site, plus the agricultural acreage being proposed for mitigation land for the Village Farms project immediately to the west of the Old City landfill site.

Many concerns have been raised by the California Water Board in communications to the City during 2023 including:

- a) Currently, concentrations of metals, volatile organic compounds (VOCs), nitrates, and Total Dissolved Solids (TDS) detected in landfill groundwater monitoring well samples exceed applicable maximum contaminant levels (MCLs).

- b) Staff believes that the landfill continues to degrade groundwater quality in the area and may be a source of per-and-polyfluoroalkyl substances (PFAS).
- c) Staff has concerns that discharges from the landfill pose a potential risk to agricultural/ irrigation wells in the area.
- d) Staff also believes groundwater resources in the area of the landfill should not be developed or utilized for domestic use.
- e) Staff also has concerns about the lack of groundwater samples analyzed for PFAS chemicals because the property was previously used as a landfill site and a wastewater treatment facility which are known to be sources of PFAS.

As a result, the California Water Board communications have requested that the closed sewage treatment plant water supply well *and* all landfill monitoring wells be sampled for PFAS.

Additional sampling was also requested of the Sewage treatment plant per the communication including:

Title 22 Metals by EPA Method 200.8/200.7
Major Anions and Cations by EPA Method 300
Total Dissolved solids (TDS) by EPA Method SM2540C
VOCs by EPA method 8260B
Semi-volatile organic compounds SVOCs by EPA Method 8270
Organophosphorus Pesticides by EPA Method 8141
Chlorinated Herbicides by EPA Method 8151
Organochlorine Pesticides by EPA method 8081
Polychlorinated Biphenols (PCBs) by EPA Method 8082

Further, the Staff expressed additional concerns regarding the status of the landfill's water supply well. Previous consultants reported to the City that this well was capped at the surface: and is inactive.

And to re-iterate, the Staff stated that they had concerns that discharges from the landfill pose a potential risk to agricultural/ irrigation wells in the area. But Staff recommended that the City not use this well for any purpose until the well is sampled for the analytes discussed above and the risk to human health and the environment is evaluated prior to reactivation of the well.

Sampling was to be done by Oct. 27, 2023, however there has apparently been an extension for this deadline. A monitoring report discussing the results of the sampling has been requested by Staff . When will this sampling be done and how can the public get access to this information?

25) However, there has been no sampling of the 7-monitoring wells since 2020. More wells need to be installed at various locations on the entire Village Farms land site and on the adjacent mitigation land to the north-west of the project site. Sampling needs to be resumed and of more well sites on the Old City landfill and Sewage treatment plant and on the Village Farms site and its mitigation land to the northwest of the project. Furthermore, the sampling needs to be done more frequently than the once or twice a year prior to 2020 and need to be at least four times a year (quarterly) as was done in the early 1990's.

26) The monitoring of only 7-wells for over 500- 600+ acre vicinity of the old unlined City Landfill and Sewage Treatment Plant City land and the 390-acre Village Farms site plus the mitigation land to the north-west of the project site, This proposed ag mitigation land is adjacent to the west end of the Old City Landfill and Sewage treatment plant is an inadequate number of wells and the need t to add more wells for an adequate monitoring program. These additional monitoring wells also need to be located at various locations of the project land and north-west mitigation land and to be sample more often than just once or twice a year, and testing needs to be done at least quarterly was was done in the 1990's.

27) There has never been any groundwater or soil testing of the *west end* of the Old City Landfill Site which would be adjacent to the proposed Village Farms water detention and groundwater recapture basins. So that vicinity of the Old City Landfill needs to have monitoring wells installed and tested as does the Village Farms "mitigation ag land" which is trying to also be used for their water detention and groundwater recapture basins. Locating these basins here makes no sense because they are in near proximity to the Old City Landfill site with a history of toxics and contaminant leakage, but also the P.G and E pipeline appears to be located under this site. This does not appear to be a logical location for these groundwater recapture basins due to potential contamination as well as contamination of the groundwater and aquifers from the adjacent unlined Old City landfill site and Sewage treatment plant with a history of leakage of toxics and contaminants.

28) Isn't there a requirement to distance any residential from a landfill with at least a 1,000-foot perimeter? The Village Farms project is proposing enormous ground water recharge basins immediately adjacent to the old City Landfill and for Sewage treatment plant which seems illogical given the history of toxics and contaminants from it into the groundwater also onto Village Farms site groundwater. These ground water basins clearly need to be eliminated from this location.

29) The California Water Board has informed the City that due to the many concerns about the history of the toxics and other contaminants from the Old City Landfill into the ground water and onto the Village Farms site and that they have opened a Cleanup Program Site Case. Why has the City not asked the Water Board on advice on how to deal with the toxics and other contaminants from this Old City landfill Site before?

30) The Water Board is stating that only surface water could be used for Village Farms project given the history of toxics and other contaminants leakage from the Old City Landfill and Sewage treatment plant. So, therefore does this mean that the Village farms site will be using will that surface water be used for all its water needs including landscape and greenbelt and parks irrigation. Since it will not be using any well water? Or inadequate well water for the project on site? If so, that would mean using the surface water drinkable water for irrigation and all uses for Village Farms residents? Or will the Cannery's well water be used, and if so , what is the capacity of the Cannery well water Can it provide irrigation water for 1,800 or more units? Aren't we still in a drought status and will this mean that the City will have to have the Davis residents pay for expansion of the surface water capacity? Can the City even expand its surface water capacity?

31) While the Water Board is stating that the Village farms project would need to use only surface water, don't most if not all of the other neighborhoods in the City rely on supplemental ground well water in the summer when demand is high for irrigation and non-potable uses? It sounds like Village Farms cannot assume that it will not likely have access to any groundwater to use for irrigation nor for supplementing drinking water supply when needed as in the summers. So, where would that supplemental water come from? Or will it be using only surface water for all water using including irrigation? Would not that impact be enormous on the City's water resources and will this impose costs on City residents to subsidize the provision of additional water needs for Village Farms for all of its water needs? Using Surface water for all of Village Farms needs would be an irresponsible environmental impact.

32) Will the Village Homes project have any impacts upon the Cannery well water used or irrigation. If so, does that well have capacity for 1,400 -1,800 units? Will this well need to be dug deeper, or will there be any costs imposed on Davis City resident to provide this or any other water source for the Village farms project? If the Cannery well water will be targeted for Village Farms to tap into, what will the City do if the Cannery well does not have the capacity needed for 1,400 – 1,800+ housing units and the commercial uses on site for Village Farms? Has eh Cannery well been checked for toxics and other contaminants and PFAS chemicals?

33) It looks like the P,G and E pipeline goes under the planned groundwater retention basins? If that is the case, has P,G & E been notified? If so, how does P,G and E feel about that? Do they know about Whitcombe's plans?

34) There is a pond and water retention basin between the East Village and North Village. Will not ground water be needed for this pond? If so, any toxics, contaminates including PFAS chemicals would present health risks to the public.

35) It is of great concern that any groundwater toxics and contaminants including PFAS chemicals will also impact the wildlife and habitat including the channel habitat as well as the vernal pools.

36) There are serious potential health, welfare, and safety impacts on the residents living in the Village Farms project from any toxics, or contaminants or PFAS chemicals from the Old City Landfill and Sewage Treatment plant. The groundwater aquifers, stormwater and water source wells are all sources of exposure to the public if there is contamination from the Old City Landfill and Sewage treatment plant This is a potential public health issue and would be an enormous legal liability exposure to the City long term.

37) The City needs to looking into having a through toxics, and other contaminants including PFAS chemical clean-up program of the former Old City Landfill and Sewage treatment plant.

Thank you for including and addressing these issues and concerns in the Village Farms EIR. Please feel free to contact me if you have any questions at emsamitz@dcn.org or (530) 756-5165.

**Eileen M. Samitz,
Davis Resident**



Explore, enjoy and protect the planet

From : Sierra Club Yolano Group
To: Sheri Metzker
Re: Village Farms NOP Comments
Date: Dec 8, 2023

Transmitted via email: <SMetzker@cityofdavis.org>

Ms Metzker - Regarding the Notice of Preparation (NOP) and the upcoming preparation of a Draft Environmental Impact Report (DEIR) for the "Village Farms" project, the Sierra Club Yolano Group offers the following comments and recommendations.

Biological Resources

1. The Biological Resources should be studied in detail as outlined in the 5 December 2023 letter from Madrone Ecological Consulting, "Subject: Summary of Biological Resources Surveys Planned for the Village Farms Project, Yolo County, California." but with the following suggestions:
 - a. In the Aquatic Resources Delineation study, we recommend the timing of the determination of the extent of wetlands be expanded to include any times in which the area is water-inundated rather than at specifically identified times because inundation can occur during variable periods.
 - b. We recommend the then current leasehold farmer not perform any cultural activities resulting in soil disturbances, including planting of cover crops, until the all wetland studies are completed.
 - c. In the analysis for rare plants, we recommend all historical records be consulted.
 - d. All surveys performed for determination of Biological Resources should be performed by specialists approved or certified to perform such studies under CEQA guidelines and performed in accordance with CDFW protocols.
 - e. Environmental evaluation should also be performed considering the Yolo Regional Resource Conservation Investment Strategy/Land Conservation Plan (RCIS/LCP) in

addition to the Yolo Habitat Conservation Plan & Natural Community Conservation Plan (HCP/NCCP).

Traffic

2. The Traffic impact analysis should be studied for cumulative impacts of all the four proposed properties on Covell and the Mace curve including Village Farms, Palomino Place, Eastside (formerly referred to as Shriners), and On the Curve, as would be done in an East Covell - Mace Curve Specific Plan to assess cumulative impacts.
3. Below is a diagram which illustrates the relationship between the developments by indicating the $\frac{1}{4}$ mile walking distance of each proposed project. The proposed transportation mitigation should be developed in light of these findings to minimize walking distance to public transit



Alternatives

4. We recommend that the DEIR analyze a co-op model (perhaps similar to Dos Piños or Muir Woods) as a supplement to the proposed starter-home program, and explore the possible environmental benefits that such a model could produce and analyze the impact of Community Gardens on GHG emissions and VMT.

Hazardous Materials

5. We recommend that an additional sample from each of the seven existing monitoring wells that are still accessible on the Village Farms site and the city-owned property to the north of the site be taken and analyzed for toxic contaminants including PFAS

("forever chemicals") and determine the direction of the aquifer flow. Existing ag wells on the site planned for irrigation use in the project should be tested for the presence of toxics and contaminants including PFAS ("forever chemicals").

The Scope of Work for Raney Environmental indicates the following, "*Raney anticipates the provided Phase I ESA will include soil sampling across the entire project site to test for persistent pesticides and other potential contaminants.*" We recommend including analysis for PFAS. ("forever chemicals") in these soil surveys

Hydrology

6. We recommend the potential impact of peak flows and volumetric capacity on the project and downstream system be studied using a 200-year flood event in the Drainage report in addition to using a 100-year flood event

Cultural Resources -

7. We recommend that the Yoche Dehe Wintun Tribe and other tribal groups be consulted with more than a certified letter to notice them of the upcoming DEIR and consultations opportunities

Dara Dungworth

From: Keirsten Taillon <keirtaillon@gmail.com>
Sent: Friday, December 8, 2023 7:38 PM
To: Sherri Metzker
Subject: Village Farms comment

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

Dear Ms. Metzker, et al.,

While opinions undoubtedly differ on the scale, causes and potential solutions of the housing shortage in Davis, the current planning application and NOP for the proposed Village Farms development poses some concerns. My feedback on the application centers is centered around the following areas/themes: 1. The proposed alterations to The Cannery Urban Farm and UATA, which disrupt the Cannery Farm Concept, and construction of road linkage between Village Farms and The Cannery, when The Cannery currently faces independent traffic safety concerns. 2. Concentration of high-density housing elements and isolated arrangement of open spaces as drafted contravenes principles of equity. 3. Negative traffic impacts along L Street corridor given points (1) and (2) above. 4. The City's failure to deliver traffic mitigations promised to The Cannery nearly a decade ago during The Cannery planning/EIR process. I. Proposed Alterations to the Cannery Urban Farm and UATA, Which Disrupts the Cannery Farm Concept, and Construction of Road Linkage Between Village Farms and The Cannery, When The Cannery Currently Faces Independent Traffic Safety Concerns. First, I would like to point out a disturbing pattern of conflicting statements between the Village Farms project description/application (referred to as "PDA" hereafter) submitted on 4/7/2023 and the Notice of Preparation of a Draft Environmental Impact Report and Scoping Meeting (referred to as "NOP" hereafter) issued by the City on 10/24/2023. On pp. 16 and 33, the Village Farms PDA indicates a roadway linkage between Village Farms and The Cannery. However, the NOP on pp. 10-11 indicates that "the proposed project would not result in modifications to the existing [Cannery] UATA [Urban Agrucultural Transition Area, aka Urban Farm]". The NOP demonstrates an alarming lack of candor on this point: how could a road linking Village Farms and The Cannery possibly be constructed without any modification of the existing UATA? As imagined, proposed, and built, the Cannery includes an Urban Farm, which is integral to the Cannery neighborhood. While I and many of my neighbors would be supportive of a bike and pedestrian access path linking the proposed Village Farms development with The Cannery, the notion of building a high-volume motor vehicle roadway through the UATA and Urban Farm is starkly at odds with maintaining the Farm as an integral feature of the neighborhood and would likely further challenge the operation of the fledgling farm operation. In my view, the only proposed alteration which would be acceptable would be an expansion of the existing Cannery Urban Farm and UATA to integrate Village Farms' proposed "Green Acres" educational farm concept. On p. 33 of the PDA, applicants indicate that "additional vehicle road access" to the site will be provided via an extension of Cannery Loop, among other "existing adjacent streets". It is my view, and the view of many of my neighbors, that this statement in the PDA substantially downplays the level of access to Village Farms that would be provided via The Cannery, given that the proposed development sites all its high-density housing elements at the Southwest corner of the development, directly adjacent to The Cannery, and given that the proposed extension of L Street and the associated intersection with Covell Boulevard likely cannot handle the increase in traffic implied by the development of Village Farms. As you are aware, L Street intersects with Covell Boulevard at a curved portion of Covell. It seems highly unlikely that this intersection would support a sufficient left-hand turn lane for eastbound Covell traffic into Village Farms. Instead, it is reasonable to assume that residents of Village Farms, and particularly residents of the high-density housing elements located at the Southwest corner of the development, would utilize the left-hand turn lane for eastbound Covell traffic at J Street into The Cannery, creating significant traffic impacts for Cannery residents during afternoon/evening rush hours. Additionally, it seems likely that Village Farms residents would make use of existing internal Cannery roads, particularly the southern edge of Cannery Loop, to access Market Street for westbound travel on Covell toward UC Davis (via Anderson Road), Hwy 113, I-80 westbound, etc., creating significant traffic impacts for Cannery residents during morning rush and significant traffic safety concerns by introducing additional commuter traffic volumes onto internal Cannery streets. As you are also aware, The Cannery was purposefully designed and developed as a sustainable, master-planned community with much

narrower streets than are found elsewhere in the City. Unfortunately, this concept has not been fully brought to fruition, and The Cannery still lacks many needed traffic mitigations to realize the vision of European-style urban traffic calming. While the neighborhood was successful in lobbying the City for stop signs at two formerly completely uncontrolled intersections, many additional mitigations are needed to accommodate existing traffic volumes, to accommodate additional traffic volumes expected for the new market-rate rental development and the eventual Cannery Village Marketplace development, and to drive higher bike and pedestrian modal share. Given The Cannery's existing traffic problems, the prospect of offloading a significant additional volume of commuter traffic from Village Farms into the Cannery neighborhood is simply unacceptable.

II. Concentration of High-Density Housing Elements and Isolated Arrangement of Open Spaces As Drafted Contravenes Principles of Equity. As noted above, Village Farms as proposed would concentrate/segregate all of its high-density housing elements toward the southwest corner of the development. Additionally, the current arrangement of massive open spaces and massive residential areas would significantly limit access to open spaces by some Village Farms residents. The proposed concentration of high-density housing elements would concentrate traffic volumes along the L Street and J Street corridors (particularly the J Street corridor) and offload significant commuter traffic volumes into The Cannery. The concentrated siting of high-density housing elements is anti-egalitarian and generally at odds with the community ethos of Davis. The current proposed balkanized arrangement of large residential housing areas and large open spaces rejects the best planning lessons from The Cannery, Village Homes, etc.

III. Traffic Impacts Along L Street Corridor. Assuming the City will properly act to preserve the integrity of the existing Cannery UATA (as promised in the 10/24 NOP), the existing Village Farms plan (excluding road access to The Cannery) would present unacceptable traffic impacts along the L Street corridor. As noted above, the current arrangement of the L Street intersection with Covell Boulevard will not support an adequate left-hand turn lane for eastbound Covell traffic into Village Farms. The developers must revisit the site-plan to better distribute traffic volumes and traffic impacts across the Pole Line and L Street corridors.

IV. Disappointing City Track Record on Proposed Traffic Mitigations. The Cannery EIR noted many potential mitigations for incremental traffic volumes associated with the development of The Cannery itself, and roughly a decade since the conclusion of that process, some of the key proposed mitigations have not yet been delivered despite being included in the City's Capital Improvement Plan at the time of Cannery's application and EIR process. Key among those is the signalization of the intersection at J Street and 8th Street. In my opinion, this is one of the most dangerous intersections in the entire City, and one which I and many of my neighbors purposefully avoid. When I recently reviewed The Cannery EIR documents and realized that signalization of this intersection was proposed and budgeted for more than a decade ago, with no progress in the intervening years, I was deeply dismayed. Any proposed mitigations associated with new traffic volumes from Village Farms should be informed by a realistic view of City's capabilities, given its past track record of non-delivery of previously proposed mitigations. In addition to the above, I note that many of my neighbors have raised additional concerns regarding loss of wildlife habitat, potential loss of the existing flood plain, loss of agricultural land, climate impacts, bike safety implications for Village Farms children potentially commuting to North Davis Elementary, etc. I am not well versed on those particular issues, but trust that they will be adequately examined in the EIR process and that any City approvals will be conditional upon strong mitigations for my concerns raised above and those of my neighbors and the broader community raised during the EIR process.

Dara Dungworth

From: John Zeller <zeller.jp@gmail.com>
Sent: Thursday, December 7, 2023 3:33 PM
To: Sherri Metzker
Subject: Village Farms EIR
Attachments: National report on climate change_davisenterprise (2023.11.21).pdf; Building a Tomato for a Hotter World - WSJ (2023.12.03).pdf

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

Sherri,

Regarding Village Farms, I strongly recommend the EIR address the following:

1. I know traffic issues will be studied intensely but I am very concerned about the number of additional cars and bicycles traveling through the Cannery via our traffic circle. I am especially concerned for the safety of children from the Village Farms traversing the narrow streets and the very narrow traffic circle in the Cannery.
2. City staffing needs and associated budget considerations.
3. Loss of more prime agricultural land in light of urgent climate change issues.

Regarding the Cannery traffic circle, the approaches to the circle are so narrow there is no room for a bicycle lane and a car so kids on bikes will be competing with cars to move through the circle. Some of this bike traffic can jump to the sidewalk and the pedestrian crossing to avoid cars (perhaps creating problems for pedestrians) but to make the left turn, the biker must stay in the circle. This is already dangerous but with double to triple the current traffic, this will be extremely dangerous.

Regarding City staffing needs, the Cannery development has been a disaster from a planning and construction/code enforcement perspective which was recently acknowledged by City staff. Between Village Farms and the Shriner development, potentially 3,000 additional dwelling units will add huge, unprecedented demands on City planning and code enforcement staff on top of the current workload that already appears overwhelming. The City needs to beef up current code enforcement and bulk up on staff for these new developments if they are approved. What's the plan for evaluating/quantifying these needs and what's the strategy and timetable for recruiting, hiring, training and supervising a significant increase in staff? Is the City ready, willing and able to make a commitment to strong code enforcement and to budget accordingly? Additionally, what are the needs and budget impacts for Parks and Public Works? The City is obviously struggling to maintain what we have and we are disappointed in the current level of maintenance we experience.

Regarding loss of more prime agricultural land, is this really an issue or has the City decided climate change is a hoax? If climate change is real and the consequences are as severe as heralded by our leaders, we must change our ways! The attached Davis Enterprise article reports on the recent federal "Fifth National Climate Assessment" that paints a dismal picture of our situation, especially for California. The attached Wall Street Journal article reports on plant breeders in Woodland, CA on a mission to save "ketchup" from the effects of climate change. We have wrecked some of our state's most valuable crops like tomatoes. The article points out that California produces 90% of U.S. processing tomatoes and drought has shrunk tomato acreage dramatically. Between Village Farms and the Shriner development another 624.8 acres of prime land will be removed from agricultural production. Will the EIR address this? Can we find other ways to meet our housing needs without increasing our risk of starvation by destroying our best farm land?

I think we need to say stop! Both of these proposed developments should be reduced by at least 75% or eliminated entirely.

John Zeller

1000 Berryessa Lane, #414
Davis, CA

<https://www.wsj.com/science/environment/ketchup-tomato-california-hotter-world-94337adf>

The Race to Save Ketchup: Building a Tomato for a Hotter World

Seed companies are investing in drought tolerance technologies to help farmers mitigate climate change

By *Patrick Thomas* [Follow](#) | *Photographs by Max Whittaker for The Wall Street Journal*

Dec. 3, 2023 7:00 am ET

In the heart of one of the world's top vegetable-growing regions in California, scientists are on a mission to save ketchup.

Plant breeders at the Woodland, Calif., facility of German pharmaceutical and agriculture giant Bayer **BAYRY 2.16%** ▲ are testing whether tomatoes meant for processing into pizza sauces and ketchup can survive on a fraction of their traditional water needs, without sacrificing taste or juiciness.

Using a small set of tweezers, Taylor Anderson carefully removes the part of a tomato plant that allows it to self-pollinate. He extracts pollen from the flower of a second plant and places it on the first, creating a new hybrid.

Anderson, a vegetable breeder at Bayer, leads a team that is mixing and matching tomato varieties that have historically done well under drought conditions or have a stronger root system, aiming to produce varieties capable of growing with 20% or 50% less water.



Plant breeders at Bayer are testing whether tomatoes used for pizza sauces and ketchup can survive on a fraction of their traditional water needs, but still maintain taste and juiciness.

“We haven’t hit the doomsday scenario of just not having just enough water to do our basic agricultural needs,” says Anderson, “but that day is coming and it’s coming soon.”

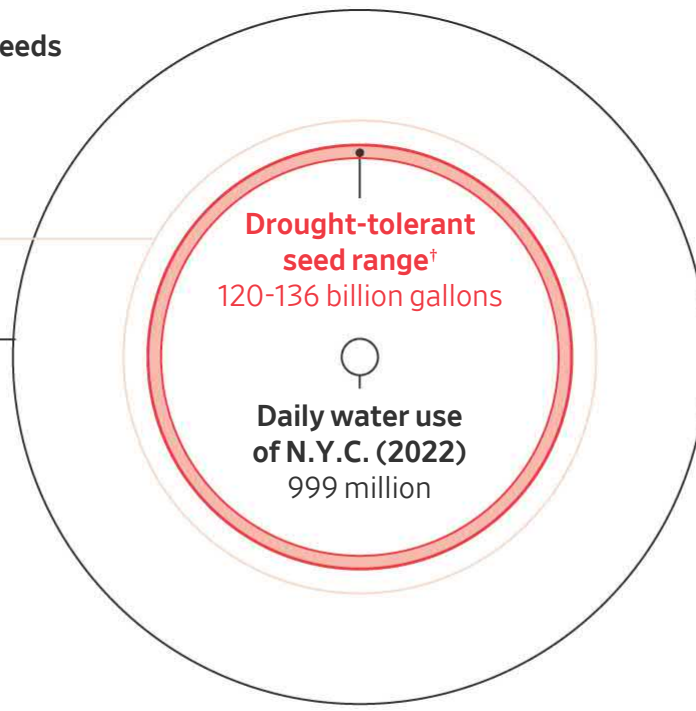
Bayer’s tomatoes are one example of how the agriculture industry is now trying to stay ahead of a changing climate that could disrupt the food supply chain and drive up prices for consumers.

Partly it is defense. Droughts and rising temperatures globally have taken a heavy toll on agriculture in recent years, and some scientists and agriculture officials expect a changing climate to make extreme weather events more common.

Total water use among drought-tolerant tomato seeds

Typical growing season amt.
169 billion

Annual water use of N.Y.C. (2022)*
365 billion



*Based on daily amount

[†]Range made up of continuous drought, late drought and extreme late drought stress. Estimates based on current testing that could be achieved if broadly adopted when commercialized.

Sources: Bayer (typical amt., drought-tolerant seed ranges); City of New York (N.Y.C. water usage)

In California, droughts and severe weather conditions in recent years have wrecked some of the state's most valuable crops, such as tomatoes, almonds and alfalfa. California produces more than 90% of U.S. processing tomatoes, used for sauces and pastes.

That is powering a race among seed companies, where executives say they are harnessing their billion-dollar research and development budgets to create hardier crops. Those efforts include less-water-intensive rice and shorter corn that can handle higher winds, as well as chemicals to battle pests that spread in warmer temperatures.

“There is a unique sense of urgency,” said Bayer’s head of vegetables R&D, J.D. Rossouw—to stay ahead of the changing climate, and the competition.

At Kraft Heinz, executives said conditions in California have prompted the ketchup maker to consider Washington state for growing tomatoes needed to help produce the seeds for 40% of all tomato products sold in grocery stores worldwide.

“It is very hard right now,” said Kraft Heinz CEO Miguel Patricio in an interview. “There’s a lack of tomatoes in the world.”

It can take companies more than a decade to develop new seed varieties, and there is no guarantee they would be enough to help farmers mitigate the effects of climate change in the



A lab analyst at Bayer's Vegetable Research & Design Lab in Woodland, Calif. loads a machine that helps process seeds for disease testing.

long term. Developing hardier plants is one way to help farmers cope without migrating crops from one growing region to another, which would be excruciatingly difficult or impossible, industry officials say.

Moving crops would require purchasing new equipment that could cost hundreds of thousands of dollars, said Jeff Rowe, incoming chief executive of seed and pesticide company Syngenta. The supply chain infrastructure and processing plants built around crops such as corn and soybeans in the Midwest would have to completely change, he said.

“Innovation has never been more important,” Rowe said.

The industry has already spent years developing drought-resistant corn and soybeans, specifically by focusing on creating stronger root systems. More resilient plant genetics have been credited by analysts with helping the two largest crops in the

U.S. survive hotter and dryer growing conditions in the Midwest this summer.

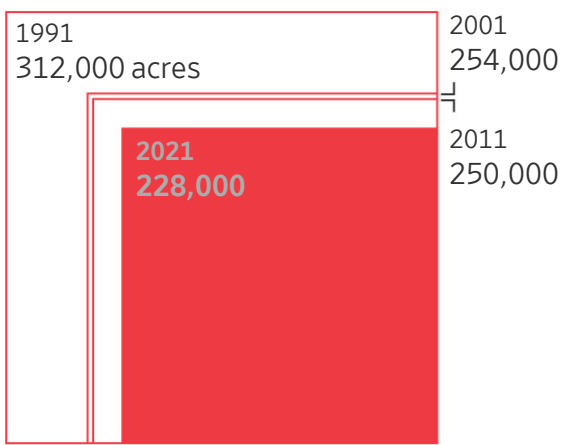
“The challenge we’re facing is the speed at which it (climate) is changing,” said Wendy Srnic, seed company Corteva’s vice president of biotechnology, referencing various issues farmers are facing.



Developing
hardier
plants
is
one
way
to
help
farmers
cope
without
migrating
crops
from
one
growing
region
to
another,
industry
officials
say.

Corteva is working on new corn varieties that can be grown in places that were previously too cold, such as western Canada. Syngenta is developing new pest-resistant cabbage for European farmers meant to stave off insects and diseases once unique to Africa but that have spread north from climate change, the company said.

Harvested acres of tomatoes in California



Source: Agriculture Department

California farmers are eager for a solution. Jim Beecher produces roughly 160,000 tons of tomatoes a year 45 miles southwest of Fresno, Calif. He says most Americans have probably tasted his tomatoes, which will eventually be turned into ketchup for Kraft Heinz.

Drought the past few years has made it hard for Beecher to make his farm profitable. Some members of his family business have talked about selling the farm, he said.

Planting acreage for processing tomatoes fell more than 20% from 2014 to 2022, largely because of persistent drought in the region, according to the U.S. Department of Agriculture. If water becomes more scarce, the long-term viability of California tomatoes could be in jeopardy.

“It’s been dire,” Beecher said, adding that more resilient tomato varieties are one of the few solutions that will keep tomato production in the area viable long term.



‘There’s a lack of tomatoes in the world,’ Kraft Heinz CEO Miguel Patricio in an interview.

Bayer’s efforts to improve tomato seeds revolve around traditional plant-breeding techniques, crossing two plants to produce offspring that share the best characteristics of their parents. Over the past few months, Bayer’s Anderson observed about 40 new breeds of tomato in hundreds of plots, testing them under different growing conditions, such as 20% or 50% less water. The three or four breeds that perform best will move to the next round of testing in 2024.

So far, Anderson said, the results are promising. The physical appearance of plants weren’t markedly different and none had shriveled up and died. If successful, Anderson estimates that based on current testing it is possible the seeds could save California farmers roughly 34 billion gallons of water a year, assuming they are broadly adopted.

https://www.davisenterprise.com/news/agriculture_environment/national-report-on-climate-change-details-sweeping-effects/article_b6721b86-88d5-11ee-a3f6-874920e142d6.html

National report on climate change details sweeping effects

By Alejandro Lazo, CalMatters
Nov 21, 2023



Water floods a neighborhood in Planada on Jan. 11. The town was under evacuation orders after a series of storms flooded the area.

Larry Valenzuela, CalMatters/CatchLight Local photo

A new national climate assessment paints a dismal picture of the nationwide impacts of climate change, driving food shortages, intensifying droughts, floods and wildfires, spreading diseases and air pollution and jeopardizing public infrastructure like roads and railways.

The federal report, released today, ranked California among the top five states suffering economic effects from climate-related natural disasters. A chapter about the risks and effects in the Southwest contains a long and alarming list of projections, particularly the impact of drought on water supplies, agriculture, diseases and ecosystems.

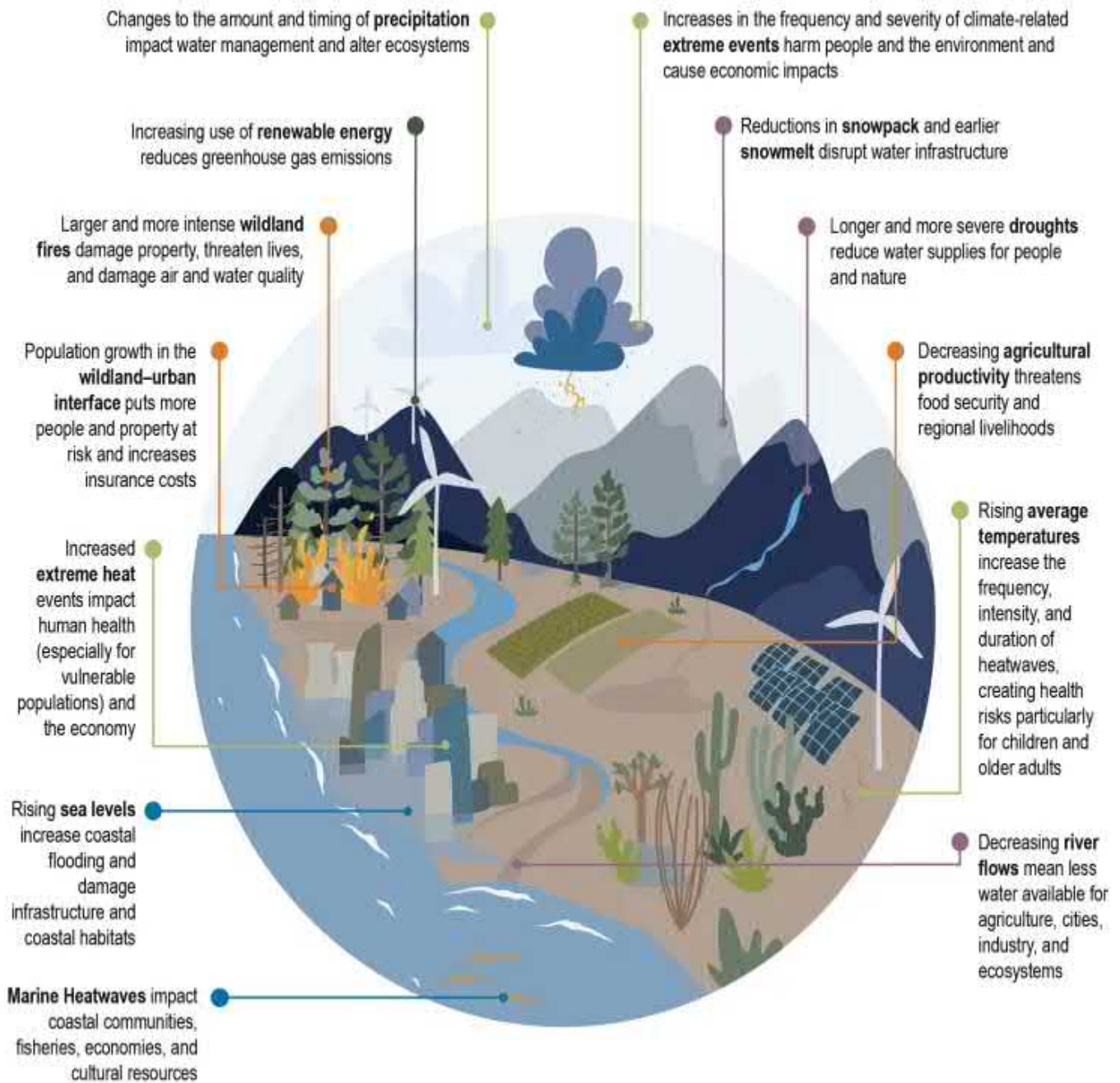
“Droughts are projected to increase in intensity, duration, and frequency, especially in the Southwest....Human and natural systems are threatened by rapid shifts between wet and dry periods that make water resources difficult to predict and manage,” the report reads.

The [Fifth National Climate Assessment](#), which the U.S. government describes as its preeminent report on climate change, noted the compounding impacts of climate change: A wildfire in one part of a state can migrate across its regions or into other states, and will worsen air quality far from the source. The report also warns of “sudden failures” when the impacts of climate change combine with other factors, like food insecurity and changing migration patterns.

UCLA climate scientist Aradhna Tripathi, one of the authors, said the new assessment “documents the state of the science on the physical and human experiences. It shows absolutely that what is happening is not normal.”

“We’re actively experiencing severe climate change impacts It’s no longer theoretical or a distant threat, an abstract one. It is not something that happens in the future here. It is not something only happening in places far away from where we live. All weather is now being affected. And this is human caused,” she said.

Climate Change Indicators, Impacts, and Responses in the Southwest



Graphic courtesy of Arizona State University

Unless greenhouse gas emissions are slashed, even more dire impacts on people, the economy and the environment will be coming, the report warns.

“The effects of human-caused climate change are already far-reaching and worsening across every region of the United States,” the report says. “Without deeper cuts in global net greenhouse gas emissions and accelerated adaptation efforts, severe climate risks to the United States will continue to grow.”

“Despite an increase in adaptation actions across the country, current adaptation efforts and investments are insufficient to reduce today’s climate-related risks and keep pace with future changes in the climate,” the report says.

“It is not something that happens in the future here. It is not something only happening in places far away from where we live. All weather is now being affected. And this is human caused.”

Ariadna tripati, UCLA climate scientist and co-author of the report

Nationwide, annual greenhouse gas emissions fell 12% between 2005 and 2019, driven largely by changes in how electricity is produced. Emissions from power plants dropped 40% due to declining use of coal and more reliance on natural gas and solar power.

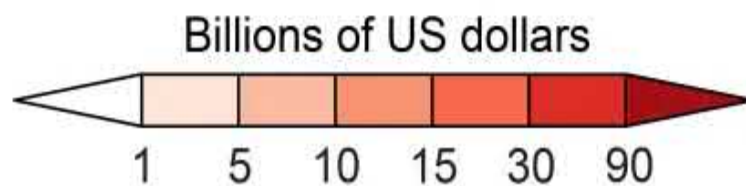
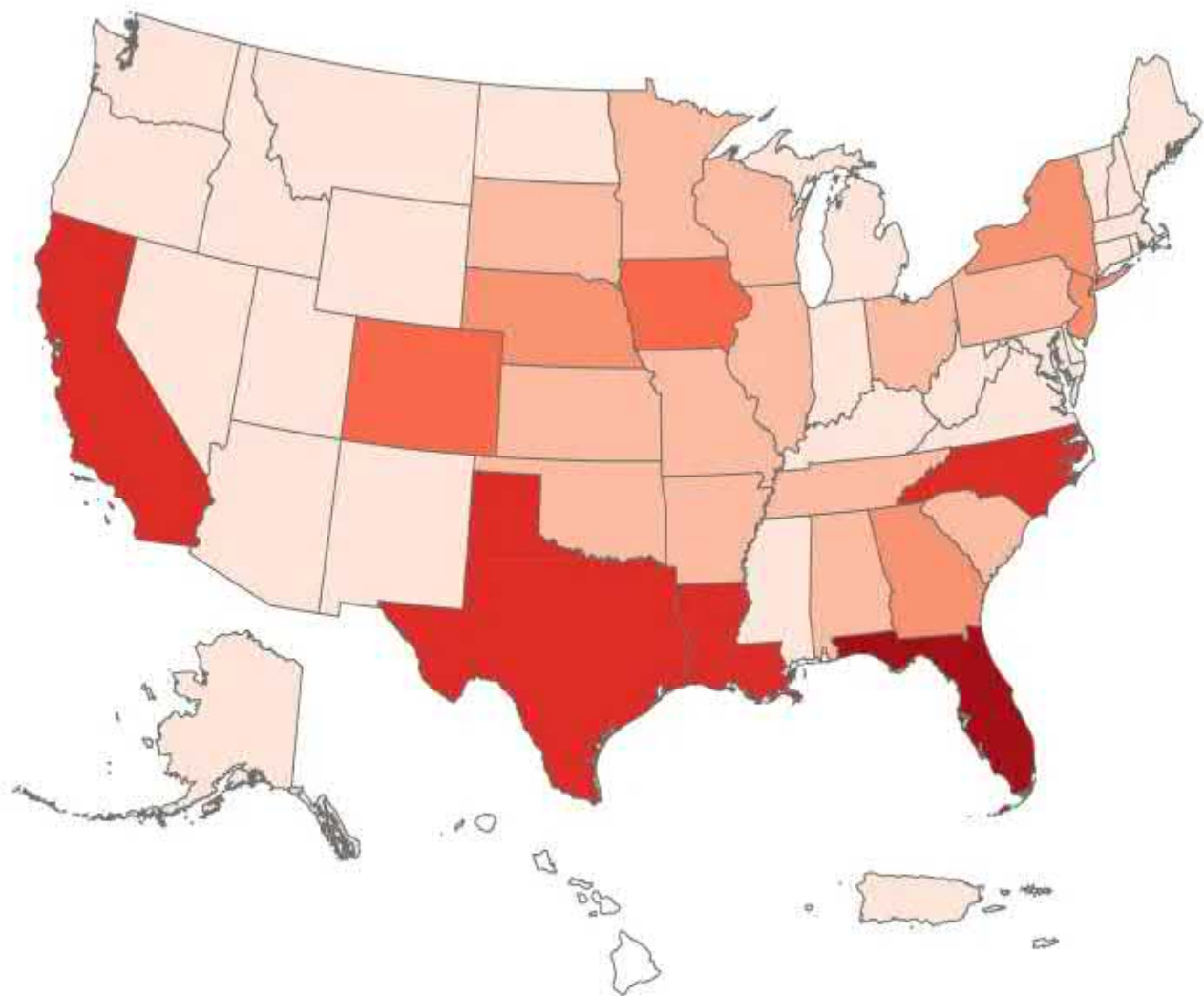
Transportation is now the largest emitter nationwide. California has led the way in addressing this, adapting a mandate that will [ban the sale of new gasoline-powered cars by 2035](#).

The report highlighted states’ efforts to combat climate change, such as commitments by California and other states to reduce greenhouse gas emissions in line with the [Paris Agreement](#), and California’s commitment to reach net-zero carbon emissions by 2045.

The economy and public infrastructure

During the 1980s, the U.S. experienced a billion-dollar disaster every four months when adjusted for inflation, according to the report. But now the average is once every three weeks. Between 2018 and 2022, the U.S. experienced 89 events with costs that exceeded a billion dollars.

Damages by State from Billion-Dollar Disasters (2018–2022)



Billion-dollar weather and climate disasters are events where damages/costs reach or exceed \$1 billion, including adjustments for inflation. Graphic via Fifth National Climate Assessment

In coastal areas, people's homes and properties, as well as public infrastructure, are increasingly exposed to rising seas.

“In coastal areas, sea level rise threatens permanent inundation of infrastructure, including roadways, railways, ports, tunnels, and bridges; water treatment facilities and power plants; and hospitals, schools, and military bases,” the report says.

Florida led the pack, exceeding \$90 billion in economic damages from billion-dollar disasters between 2018 and 2022, with California, Texas, North Carolina and Louisiana closely behind, with total damages between \$30 billion and \$90 billion.

Droughts and floods

The Southwest, which includes California, naturally has intense periods of drought and rainfall that are now exacerbated by changing climate patterns. The report predicts reduced flows in major river basins, including the Colorado River, [a major source of water in Southern California](#).

The Southwest is experiencing a megadrought, the driest period in 1,200 years. What’s more, snowpack is decreasing, which could have implications for “surface water and groundwater supplies.”

“The effects of human-caused climate change are already far-reaching and worsening across every region of the United States.”

fifth national climate assessment report

Even as California and surrounding states feel the impacts of drought, California and the rest of the Southwest are vulnerable to flooding from extreme storms and rapid snowmelts. The report warns that sea level rise may threaten critical water supplies in the Sacramento–San Joaquin Bay Delta region.

“In coastal environments, dry conditions, sea level rise, and saltwater intrusion endanger groundwater aquifers and stress aquatic ecosystems,” the report warns. “Inland, decreasing snowpack alters the volume and timing of streamflow and increases wildfire

risk. Small rural water providers that often depend on a single water source or have limited capacity are especially vulnerable.”

Drought in California’s San Joaquin Valley has disrupted farm workers’ employment, reduced food and water security, and affected health with more extreme heatwaves and smog.

The report predicts that the Southwest will experience more extreme heat and smoggy days, contributing to more illness and premature death. Drier air could lead to more dust storms, doubling the deaths attributed to fine dust during the final two decades of this century. The incidence of Valley fever also is expected to increase.

Coasts and sea level rise

The report notes that California’s coastal sea surface temperature has seen an average increase of 0.4° to 0.6°F per decade since the 1970s. This causes marine heatwaves that jeopardize marine mammals, seabirds and fisheries.

The state’s coastal habitats and homes are threatened by rising seas — and California has more people living below 3.3 feet (one meter) of elevation than any state other than Louisiana. The state’s transportation fuel network is also at risk of flooding. The report noted that under one sea level rise scenario, the Toxic Tides Project found that some 400 industrial facilities and toxic sites could be at risk of flooding.

Higher sea levels also could increase coastal groundwater levels, “exposing communities to flooding from water that emerges from underground,” with communities in “low-lying areas” such as San Francisco Bay most at risk, the report says.

Wildfires

The report foresees wildfires, exacerbated by climate change, as continuing to have a major impact in California. Of the 50 largest U.S. wildfires in 2020, 22 occurred in California, and the 7 largest wildfires recorded in California have occurred since 2018, the report noted.

Three of the five deadliest fires on record in California have occurred since 2017, costing 122 lives. In 2021, 3,363 structures burned due to wildfires in California, the highest number lost in any state. During harvest seasons these conflagrations increase risks for workers.

With warmer and drier conditions, wildfires are moving higher in elevation and creating hotter and more severe fires. These trends are expected through the middle of this century. More fires and larger areas burned will lead to loss of biodiversity of species and “result in a significant health burden, especially for at-risk populations.”

Food and agriculture

Climate change is expected to disrupt global and U.S. food production, and California is particularly susceptible to these disruptions. California is the leading state in agricultural cash crops, with substantial income from fruits, nuts and vegetables.

The report says food shortages and higher food costs are expected because of the impact of the changing conditions. Many growers already are [trying to adapt](#) to the new rainfall patterns and temperatures.

Drought cost the industry an estimated \$1.28 billion in 2021 alone. Warming temperatures are expected to reduce yields of valuable crops, including almonds and wine grapes.

In California, rising temperatures will alter crop timing and locations, potentially harming orchard crops with warmer winters. Fewer cold snaps may reduce frost exposure, but “false springs” could increase vulnerability. Summers will likely see more heatwaves. Meanwhile periodic floods from atmospheric river storms are poised to hit California’s Central Valley, also disrupting farming.

Dara Dungworth

From: Callie Garritson <calliegarritson@icloud.com>
Sent: Friday, December 8, 2023 4:42 PM
To: Sherri Metzker
Subject: Village Farms Feedback

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

Dear Ms. Metzker-

My name is Callie Garritson and I live in the Cannery. I support building housing in Davis. We are a family of five living in a too-small starter house in the Cannery and we essentially can't upgrade to a larger house to accommodate us as we grow (or if an aging parent needs to move in) because the price of anything meaningfully bigger is 2x the price of our home, 3x the mortgage payment. It should not be impossible to buy an appropriately sized home for a family in Yolo County. However, the proposed development falls short in a number of areas.

Here are my comments, which I tried to keep brief:

1. A roadway connection from Village Farm to the Cannery is completely unacceptable and shocking that it's even proposed given that it would basically destroy our neighborhood and endanger the lives of our children, many of whom bike to school on already-unsafe roadways in the Cannery. Kids bike to Holmes straight down the protected bike path on Cannery Loop to J street and that path would be intersected by this new road. With the traffic issue at Pole Line and Covell, many drivers would choose to cut through the Cannery.
2. Maybe the lots don't need to be as big as proposed, but there should absolutely be a sizable number of single family houses in the new neighborhood. In my opinion, SFHs should take up 75% of the ground space, much like the Cannery. I'm concerned this new neighborhood will become giant apartment/ row house block. This will encourage it to be filled with students and other more temporary residents. Families don't want small townhouses, apartments or condos. If DJUSD needs families, they are not going to move here for the apartments.
4. The development of Village Farms is likely the last large centrally located neighborhood that will be built over the next 20 years. Please work make sure it is beautiful, tasteful and in the spirit of the city with parks and nature and bike paths.
5. The traffic on Covell is already painful and unsafe during commute and school drop off/pick up hours. I can't even imagine what adding thousands of cars will do to that. Plus Pole Line is also very congested at peak times today, when that acreage is empty.
6. The college students that live in the Cannery tend to be affluent and all have their own individual car. So there are often 4 cars per three bedroom house. Please make sure to factor that in to your plans. You cannot assume 2 cars per household. Assume at least 3. This was not factored in in the Cannery and our street parking situation is too crowded and confusing.
7. I'm concerned with how building a neighborhood, parts of it at higher elevation than the Cannery, will contribute to flooding and might require Cannery residents to buy flood insurance and put us at risk for flooding. I've attached a picture of what the reservoir behind the Cannery looked like last January (1/14/23) after all the rain we had.

Thank you for considering my feedback. I hope the city can work with the Cannery to have these two neighborhoods exist in harmony.

Callie Garritson



Dara Dungworth

From: Elizabeth Coolbrith <elizabeth.coolbrith@gmail.com>
Sent: Friday, December 8, 2023 3:07 PM
To: Sherri Metzker; Donna Neville; Tracie Reynolds
Cc: Robert Coolbrith
Subject: Village Farms feedback

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Dear Ms. Metzker, et al.,

While opinions undoubtedly differ on the scale, causes and potential solutions of the housing shortage in Davis, the current planning application and NOP for the proposed Village Farms development reinforces the view that there is everywhere and always a shortage of good neighbors—thus far, Mr. Whitcombe and his associates' plan suggests to me and many of my neighbors that Village Farms does not plan to be a particularly good neighbor to The Cannery and the broader community of the City of Davis.

My feedback on the application centers is centered around the following areas/themes:

- 1. The proposed alterations to The Cannery Urban Farm and UATA, which disrupt the Cannery Farm Concept, and construction of road linkage between Village Farms and The Cannery, when The Cannery currently faces independent traffic safety concerns.**
- 2. Concentration of high-density housing elements and isolated arrangement of open spaces as drafted contravenes principles of equity.**
- 3. Negative traffic impacts along L Street corridor given points (1) and (2) above.**
- 4. The City's failure to deliver traffic mitigations promised to The Cannery nearly a decade ago during The Cannery planning/EIR process.**

I. Proposed Alterations to the Cannery Urban Farm and UATA, Which Disrupts the Cannery Farm Concept, and Construction of Road Linkage Between Village Farms and The Cannery, When The Cannery Currently Faces Independent Traffic Safety Concerns.

First, I would like to point out a disturbing pattern of conflicting statements between the Village Farms project description/application (referred to as "PDA" hereafter) submitted on 4/7/2023 and the Notice of Preparation of a Draft Environmental Impact Report and Scoping Meeting (referred to as "NOP" hereafter) issued by the City on 10/24/2023. On pp. 16 and 33, the Village Farms PDA indicates a roadway linkage between Village Farms and The Cannery. However, the NOP on pp. 10-11 indicates that "the proposed project would not result

in modifications to the existing [Cannery] UATA". The NOP demonstrates an alarming lack of candor on this point: how could a road linking Village Farms and The Cannery possibly be constructed without any modification of the existing UATA?

As imagined, proposed, and built, the Cannery includes an Urban Farm, which is integral to the Cannery neighborhood. While I and many of my neighbors would be supportive of a bike and pedestrian access path linking the proposed Village Farms development with The Cannery, the notion of building a high-volume motor vehicle roadway through the UATA and Urban Farm is starkly at odds with maintaining the Farm as an integral feature of the neighborhood and would likely further challenge the operation of the fledgling farm operation. In my view, the only proposed alteration which would be acceptable would be an expansion of the existing Cannery Urban Farm and UATA to integrate Village Farms' proposed "Green Acres" educational farm concept.

On p. 33 of the PDA, applicants indicate that "additional vehicle road access" to the site will be provided via an extension of Cannery Loop, among other "existing adjacent streets". It is my view, and the view of many of my neighbors, that this statement in the PDA substantially downplays the level of access to Village Farms that would be provided via The Cannery, given that the proposed development sites all its high-density housing elements at the Southwest corner of the development, directly adjacent to The Cannery, and given that the proposed extension of L Street and the associated intersection with Covell Boulevard likely cannot handle the increase in traffic implied by the development of Village Farms.

As you are aware, L Street intersects with Covell Boulevard at a curved portion of Covell. It seems highly unlikely that this intersection would support a sufficient left-hand turn lane for eastbound Covell traffic into Village Farms. Instead, it is reasonable to assume that residents of Village Farms, and particularly residents of the high-density housing elements located at the Southwest corner of the development, would utilize the left-hand turn lane for eastbound Covell traffic at J Street into The Cannery, creating significant traffic impacts for Cannery residents during afternoon/evening rush hours. Additionally, it seems likely that Village Farms residents would make use of existing internal Cannery roads, particularly the southern edge of Cannery Loop, to access Market Street for westbound travel on Covell toward UC Davis (via Anderson Road), Hwy 113, I-80 westbound, etc., creating significant traffic impacts for Cannery residents during morning rush and significant traffic safety concerns by introducing additional commuter traffic volumes onto internal Cannery streets.

As you are also aware, The Cannery was purposefully designed and developed as a sustainable, master-planned community with much narrower streets than are found elsewhere in the City. Unfortunately, this concept has not been fully brought to fruition, and The Cannery still lacks many needed traffic mitigations to realize the vision of European-style urban traffic calming. While the neighborhood was successful in lobbying the City for stop signs at two formerly completely uncontrolled intersections, many additional mitigations are needed to accommodate existing traffic volumes, to accommodate additional traffic volumes expected for the new market-rate rental development and the eventual Cannery Village Marketplace development, and to drive higher bike and pedestrian modal share. Given The Cannery's existing traffic problems, the prospect of offloading a significant additional volume of commuter traffic from Village Farms into the Cannery neighborhood is simply unacceptable.

II. Concentration of High-Density Housing Elements and Isolated Arrangement of Open Spaces As Drafted Contravenes Principles of Equity.

As noted above, Village Farms as proposed would concentrate/segregate all of its high-density housing elements toward the southwest corner of the development. Additionally, the current arrangement of massive open spaces and massive residential areas would significantly limit access to open spaces by some Village Farms residents.

The proposed concentration of high-density housing elements would concentrate traffic volumes along the L Street and J Street corridors (particularly the J Street corridor) and offload significant commuter traffic volumes into The Cannery.

The concentrated sitting of high-density housing elements is anti-egalitarian and generally at odds with the community ethos of Davis. The current proposed balkanized arrangement of large residential housing areas and large open spaces rejects the best planning lessons from The Cannery, Village Homes, etc.

III. Traffic Impacts Along L Street Corridor.

Assuming the City will properly act to preserve the integrity of the existing Cannery UATA (as promised in the 10/24 NOP), the existing Village Farms plan (excluding road access to The Cannery) would present unacceptable traffic impacts along the L Street corridor. As noted above, the current arrangement of the L Street intersection with Covell Boulevard will not support an adequate left-hand turn lane for eastbound Covell traffic into Village Farms. The developers must revisit the site-plan to better distribute traffic volumes and traffic impacts across the Pole Line and L Street corridors.

IV. Disappointing City Track Record on Proposed Traffic Mitigations.

The Cannery EIR noted many potential mitigations for incremental traffic volumes associated with the development of The Cannery itself, and roughly a decade since the conclusion of that process, some of the key proposed mitigations have not yet been delivered despite being included in the City's Capital Improvement Plan at the time of Cannery's application and EIR process. Key among those is the signalization of the intersection at J Street and 8th Street. In my opinion, this is one of the most dangerous intersections in the entire City, and one which I and many of my neighbors purposefully avoid. When I recently reviewed The Cannery EIR documents and realized that signalization of this intersection was proposed and budgeted for more than a decade ago, with no progress in the intervening years, I was deeply dismayed. Any proposed mitigations associated with new traffic volumes from Village Farms should be informed by a realistic view of City's capabilities, given its past track record of non-delivery of previously proposed mitigations.

In addition to the above, I note that many of my neighbors have raised additional concerns regarding loss of wildlife habitat, potential loss of the existing flood plain, loss of agricultural land, climate impacts, bike safety implications for Village Farms children potentially commuting to North Davis Elementary, potential increases in student populations at already impacted Davis schools, etc. I am not well versed on those particular issues, but trust that they will be adequately examined in the EIR process and that any City approvals will be conditional upon strong mitigations for my concerns raised above and those of my neighbors and the broader community raised during the EIR process.

Sincerely and with deep concern,

Robert J. Coolbrith

Dara Dungworth

From: Laura Eisen <eisenlaurap@gmail.com>
Sent: Friday, December 8, 2023 2:30 PM
To: Sherri Metzker
Subject: Village Farms housing proposal

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

Below are some of my thoughts about the proposed Village Farms housing project. I understand the need to build more housing in Davis, but I have a number of concerns about this project as currently planned, and would like to urge the Council to consider alternative visions for this project that would reduce the impact on the environment and on traffic.

Vernal Pools: I am particularly concerned about the loss of vernal pool habitat. 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 wide variety of species. We need to protect this area, not destroy it. (In fact, I am concerned that the landowners have already started plowing over the vernal pools as if they have already decided not to protect them.)

Flood plain: I believe that at least some of the area under consideration for Village Farms is part of the floodplain that protects 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.

Affordability: I acknowledge that Davis needs to build more housing, and that the state will find ways to make sure that the city does its part. However, what we need is more affordable housing, and it is not clear that this project focuses on that need. It appears that a large percentage of the houses proposed for Village Farms will be on relatively large lots, which suggest that they will not be the affordable housing that we really need.

Traffic: There is little doubt that building over 1800 new homes on the proposed site will have major impacts on traffic. 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 and downtown.

Thank you for your consideration.

Laura Eisen
1013 Pierce Lane
Davis, CA 95616

Dara Dungworth

From: Fei Li <fli@UCDAVIS.EDU>
Sent: Friday, December 8, 2023 6:26 PM
To: Sherri Metzker
Subject: Village Farms Proposal feedback

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

Dear Ms. Metzker, et al.,

I am writing as a representative of multiple households in East and North Davis, all lifelong Davis, with regards to the Village Farms Proposal.

Below are two important emails already sent to the city. I copy them here because we agree with them and wanted to echo their points.

First:

While opinions undoubtedly differ on the scale, causes and potential solutions of the housing shortage in Davis, the current planning application and NOP for the proposed Village Farms development poses some concerns.

My feedback on the application centers is centered around the following areas/themes:

- 1. The proposed alterations to The Cannery Urban Farm and UATA, which disrupt the Cannery Farm Concept, and construction of road linkage between Village Farms and The Cannery, when The Cannery currently faces independent traffic safety concerns.*
- 2. Concentration of high-density housing elements and isolated arrangement of open spaces as drafted contravenes principles of equity.*
- 3. Negative traffic impacts along L Street corridor given points (1) and (2) above.*
- 4. The City's failure to deliver traffic mitigations promised to The Cannery nearly a decade ago during The Cannery planning/EIR process.*

I. Proposed Alterations to the Cannery Urban Farm and UATA, Which Disrupts the Cannery Farm Concept, and Construction of Road Linkage Between Village Farms and The Cannery, When The Cannery Currently Faces Independent Traffic Safety Concerns.

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how could a road linking Village Farms and The Cannery possibly be constructed without any modification of the existing UATA?

As imagined, proposed, and built, the Cannery includes an Urban Farm, which is integral to the Cannery neighborhood. While I and many of my neighbors would be supportive of a bike and pedestrian access path linking the proposed Village Farms development with The Cannery, the notion of building a high-volume motor vehicle roadway through the UATA and Urban Farm is starkly at odds with maintaining the Farm as an integral feature of the neighborhood and would likely further challenge the operation of the fledgling farm operation. In my view, the only proposed alteration which would be acceptable would be an expansion of the existing Cannery Urban Farm and UATA to integrate Village Farms' proposed "Green Acres" educational farm concept.

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As you are also aware, The Cannery was purposefully designed and developed as a sustainable, master-planned community with much narrower streets than are found elsewhere in the City. Unfortunately, this concept has not been fully brought to fruition, and The Cannery still lacks many needed traffic mitigations to realize the vision of European-style urban traffic calming. While the neighborhood was successful in lobbying the City for stop signs at two formerly completely uncontrolled intersections, many additional mitigations are needed to accommodate existing traffic volumes, to accommodate additional traffic volumes expected for the new market-rate rental development and the eventual Cannery Village Marketplace development, and to drive higher bike and pedestrian modal share. Given The Cannery's existing traffic problems, the prospect of offloading a significant additional volume of commuter traffic from Village Farms into the Cannery neighborhood is simply unacceptable.

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The Cannery EIR noted many potential mitigations for incremental traffic volumes associated with the development of The Cannery itself, and roughly a decade since the conclusion of that process, some of the key proposed mitigations have not yet been delivered despite being included in the City's Capital Improvement Plan at the time of Cannery's application and EIR process. Key among those is the signalization of the intersection at J Street and 8th Street. In my opinion, this is one of the most dangerous intersections in the entire City, and one which I and many of my neighbors purposefully avoid. When I recently reviewed The Cannery EIR documents and realized that signalization of this intersection was proposed and budgeted for more than a decade ago, with no progress in the intervening years, I was deeply dismayed. Any proposed mitigations associated with new traffic volumes from Village Farms should be informed by a realistic view of City's capabilities, given its past track record of non-delivery of previously proposed mitigations.

In addition to the above, I note that many of my neighbors have raised additional concerns regarding loss of wildlife habitat, potential loss of the existing flood plain, loss of agricultural land, climate impacts, bike safety implications for Village Farms children potentially commuting to North Davis Elementary, etc. I am not well versed on those particular issues, but trust that they will be adequately examined in the EIR process and that any City approvals will be conditional upon strong mitigations for my concerns raised above and those of my neighbors and the broader community raised during the EIR process.

Second:

Recent research by UCD grad students and the CA Natural Diversity Data Base (a Dept of Fish and Wildlife resource) document unique alkali soil type vernal pools which are different from the Jepson Prairie pools west of Davis and only exist in a few locations in our area. This type of vernal pool is home to many special status species, both plant and invertebrate.

Our own thoughts:

In short, we believe that the Village Farms proposal has serious flaws that will make life more difficult for existing Davis residents and does little to mitigate difficulties that Village Farms residents will face as a result of the plan.

We agree that Davis needs more housing. We have voted in favor of every proposal dating back to over a decade ago thus far. But let me be clear, we do not support this project.

Thank you.

Dara Dungworth

From: Alexa Bach-McElrone <alexa@bach-mcelrone.com>
Sent: Friday, December 8, 2023 8:04 PM
To: Sherri Metzker; City Council Members
Subject: Village Farms proposal feedback

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

Hello,

Please accept the following feedback regarding the proposed Village Farms development.

There are many perspectives on the Village Farms proposal. Mine is one informed from a few vantage points: I have 20+ years in responsible real estate development and investing experience globally. My interdisciplinary schooling and work includes that of conservation, policy, law, planning, and more. I live at 1651 Cannery Loop--the residential home likely to be most impacted by increasing traffic entering from Village Farms through the farm circle. And, I served on steering committees with the New Home Company, Leeland, the Cannery, and the City of Davis. I was a point of contact for the City of Davis' former Cannery Liaison. I've served on multiple Cannery board roles. I, personally, reviewed the Cannery CFD expenditures in 2018 and 2019 while trying to rectify how funds were spent for items seemingly necessary for a future community such as Village Farms but central needs of our community were neglected. Noting: more than \$70,000 identified by the city in that process and marked for traffic calming (with community input) has never made it to us. Additionally, I seem to have better records on the matter than current city staff, including specific line-item documents with bank accounts.

When my husband, two children, and I first moved to the Cannery, city staff were often baffled by challenges with the project and its developer/builder/owners. It was explained to use then as a result of so many learnings from taking on such a new and different project for the city. Recently, city staff have often replied to Cannery issues by stating, "we had no control" or "there's nothing else we could have done." That is false. The development agreements and various addendums are laughably vague. There are no teeth. This is quite relevant at this point for Village Farms as we wonder: 1) Why build a neighboring community that will further impact this one when this community hasn't been finished, still experiences such challenges, and the city has not demonstrated any growth in development understanding nor oversight? 2) How will the results of the Village Farms EIR be upheld in a subsequent development agreement and, specifically, when multiple builders, contractors, and subcontractors are involved? 3) Is the city placing too much trust in a proposal partner with a long-standing relationship with the city, and certain individuals, without paying attention to the realities of real estate (yet again)? 4) Does the target market have the resources to wade through a similar mess as was created for Cannery owners?

To be clear: the Cannery development is still waiting to be completed. The Cannery farm is still not used as promised and the city leased it to a contractor that never intended to do much, if anything, to the farm. They just needed the barn. The Cannery still has traffic issues as it was always underparked, lacked true regulations, and was promised close to \$100K (that we had to fight for) four years ago but the city has not acted on. We have had to pursue HOA legal cases against builders and developers multiple times to rectify longstanding issues. We continue to have individual homeowners fighting for their warranties and faulty systems. My home currently hasn't had working HVAC for over a month--an issue since we moved in (in 2017) with dozens of

repair visits and a common issue across Heirloom. The New Home Company is now ignoring claims and using a different definition of the warranty. Homeowners will need to move through a lengthy mediation and then group legal process OR pay many thousands to replace their own HVAC systems as some already have. This, again, is relevant to Village Farms. The Cannery is a dam with water pouring through cracks and the city has looked the other way while certain homeowners take on the equivalent of part-time jobs to do what the city should have done initially. While this has been a tremendous strain on our families and community, we notably have the disposal income, flexible jobs, legal/real estate/construction/finance/etc expertise to do so (as we have been reminded by several city staff and elected members who felt the community was wealthy enough to take care of itself--direct conversations). Cannery owners even helped rectify some building issues for Bartlett residents in the early years (not part of our HOA) when the city was not helpful.

The Village Farms proposal claims to help lower- to mid-income buyers. How has the city prepared to take on a new development with the proper staff, oversight, legalities, planning, and more to ensure none of these issues arise for this population? How will low- to mid-income buyers handle not having HVAC for months? Will they live elsewhere or take extra vacations? Will they pay an extra several thousand dollars every year for several years in a row and only have partially working systems? What happens when their customer care contacts stop responding. Will they have customer care contract? Will landlords pass on this information to tenants? Will Village Farms owners have the connections and foresight (and time and interest) to call the President of the development company and explain the situation, demanding attention? We have been forced to do these things repeatedly for years and it is not a burden that the populations you're hoping to house can bare.

If you really want to provide a solution for the people targeted in Village Farms, the plan needs to change. The city needs to prepare. The proposal needs to match the site and the reality of real estate in Davis right now.

The Village Farms plan looks like it was created by someone doing a Real Estate 101 planning exercise--trying to hit certain housing metrics--but that hasn't spent any time on site or in this corner of Davis for many years and who lacks true knowledge of the Cannery (including the challenges, promises, lawsuits, and more).

Of importance yet minor to all of the above, the northwest corner of the proposed site is a pond every winter and has been for a decade. People have taken boats on it regularly. Asking a farmer to plow this over without notice--nor giving respectful attention to wildlife--doesn't change this reality. It creates false marketing. We don't need another community built on false marketing. We have all photographed flocks of migrating birds using those ponds every winter over the past 6+ years. It's real even if the owner sends someone with noise guns to scare them aware before city staff walk the property.

Additionally, we agree with the comments our neighbor and HOA president sent earlier. I will paste them below to ensure they weren't lost in anyone's inbox.

I assume that in Davis there are multiple voices speaking out for the many birds of prey, owls that use our nesting boxes along the property line multiple times per year, bats, mice, rabbits, frogs, coyotes, snakes, and more. The floodplain is of significant concern. Noise has been an ongoing nuisance. Between the 24/7 trains and go-kart track (which certain Cannery neighbors measured to exceed the permitted decibels years ago), adding a fire station and more should certainly be evaluated.

Just in case it needs to be clearly stated again, as in past meetings with the city, the Cannery Loop to Covell entrance (by the barn) is a major bike route for our youth. The city--and forcibly us--spent millions on the Covell underpass by the train tracks, but many youth through adults use the farm entrance as the primary ingress/egress. We do not support any additional vehicle connections to the Cannery via the farm, especially at

the traffic circle or farm entrance. Please feel free to ride with my child to and from school or sit on my porch to experience this yourself. We're constantly working on traffic calming--which has been a significant, longstanding issue with the city's half-hearted attention.

Sincerely,

Alexa Bach-McElrone and family (who would like to walk and ride safely in our community)

Via Elizabeth Coolbrith:

While opinions undoubtedly differ on the scale, causes and potential solutions of the housing shortage in Davis, the current planning application and NOP for the proposed Village Farms development poses some concerns.

My feedback on the application centers is centered around the following areas/themes:

1. The proposed alterations to The Cannery Urban Farm and UATA, which disrupt the Cannery Farm Concept, and construction of road linkage between Village Farms and The Cannery, when The Cannery currently faces independent traffic safety concerns.
2. Concentration of high-density housing elements and isolated arrangement of open spaces as drafted contravenes principles of equity.
3. Negative traffic impacts along L Street corridor given points (1) and (2) above.
4. The City's failure to deliver traffic mitigations promised to The Cannery nearly a decade ago during The Cannery planning/EIR process.

I. Proposed Alterations to the Cannery Urban Farm and UATA, Which Disrupts the Cannery Farm Concept, and Construction of Road Linkage Between Village Farms and The Cannery, When The Cannery Currently Faces Independent Traffic Safety Concerns.

First, I would like to point out a disturbing pattern of conflicting statements between the Village Farms project description/application (referred to as "PDA" hereafter) submitted on 4/7/2023 and the Notice of Preparation of a Draft Environmental Impact Report and Scoping Meeting (referred to as "NOP" hereafter) issued by the City on 10/24/2023. On pp. 16 and 33, the Village Farms PDA indicates a roadway linkage between Village Farms and The Cannery. However, the NOP on pp. 10-11 indicates that "the proposed project would not result in modifications to the existing [Cannery] UATA [Urban Agrucultural Transition Area, aka Urban Farm]". The NOP demonstrates an alarming lack of candor on this point: how could a road linking Village Farms and The Cannery possibly be constructed without any modification of the existing UATA?

As imagined, proposed, and built, the Cannery includes an Urban Farm, which is integral to the Cannery neighborhood. While I and many of my neighbors would be supportive of a bike and pedestrian access path linking the proposed Village Farms development with The Cannery, the notion of building a high-volume motor vehicle roadway through the UATA and Urban Farm is starkly at odds with maintaining the Farm as an integral feature of the neighborhood and would likely further challenge the operation of the fledgling farm

operation. In my view, the only proposed alteration which would be acceptable would be an expansion of the existing Cannery Urban Farm and UATA to integrate Village Farms' proposed "Green Acres" educational farm concept.

On p. 33 of the PDA, applicants indicate that "additional vehicle road access" to the site will be provided via an extension of Cannery Loop, among other "existing adjacent streets". It is my view, and the view of many of my neighbors, that this statement in the PDA substantially downplays the level of access to Village Farms that would be provided via The Cannery, given that the proposed development sites all its high-density housing elements at the Southwest corner of the development, directly adjacent to The Cannery, and given that the proposed extension of L Street and the associated intersection with Covell Boulevard likely cannot handle the increase in traffic implied by the development of Village Farms.

As you are aware, L Street intersects with Covell Boulevard at a curved portion of Covell. It seems highly unlikely that this intersection would support a sufficient left-hand turn lane for eastbound Covell traffic into Village Farms. Instead, it is reasonable to assume that residents of Village Farms, and particularly residents of the high-density housing elements located at the Southwest corner of the development, would utilize the left-hand turn lane for eastbound Covell traffic at J Street into The Cannery, creating significant traffic impacts for Cannery residents during afternoon/evening rush hours. Additionally, it seems likely that Village Farms residents would make use of existing internal Cannery roads, particularly the southern edge of Cannery Loop, to access Market Street for westbound travel on Covell toward UC Davis (via Anderson Road), Hwy 113, I-80 westbound, etc., creating significant traffic impacts for Cannery residents during morning rush and significant traffic safety concerns by introducing additional commuter traffic volumes onto internal Cannery streets.

As you are also aware, The Cannery was purposefully designed and developed as a sustainable, master-planned community with much narrower streets than are found elsewhere in the City. Unfortunately, this concept has not been fully brought to fruition, and The Cannery still lacks many needed traffic mitigations to realize the vision of European-style urban traffic calming. While the neighborhood was successful in lobbying the City for stop signs at two formerly completely uncontrolled intersections, many additional mitigations are needed to accommodate existing traffic volumes, to accommodate additional traffic volumes expected for the new market-rate rental development and the eventual Cannery Village Marketplace development, and to drive higher bike and pedestrian modal share. Given The Cannery's existing traffic problems, the prospect of offloading a significant additional volume of commuter traffic from Village Farms into the Cannery neighborhood is simply unacceptable.

II. Concentration of High-Density Housing Elements and Isolated Arrangement of Open Spaces As Drafted Contravenes Principles of Equity.

As noted above, Village Farms as proposed would concentrate/segregate all of its high-density housing elements toward the southwest corner of the development. Additionally, the current arrangement of massive open spaces and massive residential areas would significantly limit access to open spaces by some Village Farms residents.

The proposed concentration of high-density housing elements would concentrate traffic volumes along the L Street and J Street corridors (particularly the J Street corridor) and offload significant commuter traffic volumes into The Cannery.

The concentrated sitting of high-density housing elements is anti-egalitarian and generally at odds with the community ethos of Davis. The current proposed balkanized arrangement of large residential housing areas

and large open spaces rejects the best planning lessons from The Cannery, Village Homes, etc.

III. Traffic Impacts Along L Street Corridor.

Assuming the City will properly act to preserve the integrity of the existing Cannery UATA (as promised in the 10/24 NOP), the existing Village Farms plan (excluding road access to The Cannery) would present unacceptable traffic impacts along the L Street corridor. As noted above, the current arrangement of the L Street intersection with Covell Boulevard will not support an adequate left-hand turn lane for eastbound Covell traffic into Village Farms. The developers must revisit the site-plan to better distribute traffic volumes and traffic impacts across the Pole Line and L Street corridors.

IV. Disappointing City Track Record on Proposed Traffic Mitigations.

The Cannery EIR noted many potential mitigations for incremental traffic volumes associated with the development of The Cannery itself, and roughly a decade since the conclusion of that process, some of the key proposed mitigations have not yet been delivered despite being included in the City's Capital Improvement Plan at the time of Cannery's application and EIR process. Key among those is the signalization of the intersection at J Street and 8th Street. In my opinion, this is one of the most dangerous intersections in the entire City, and one which I and many of my neighbors purposefully avoid. When I recently reviewed The Cannery EIR documents and realized that signalization of this intersection was proposed and budgeted for more than a decade ago, with no progress in the intervening years, I was deeply dismayed. Any proposed mitigations associated with new traffic volumes from Village Farms should be informed by a realistic view of City's capabilities, given its past track record of non-delivery of previously proposed mitigations.

In addition to the above, I note that many of my neighbors have raised additional concerns regarding loss of wildlife habitat, potential loss of the existing flood plain, loss of agricultural land, climate impacts, bike safety implications for Village Farms children potentially commuting to North Davis Elementary, etc. I am not well versed on those particular issues, but trust that they will be adequately examined in the EIR process and that any City approvals will be conditional upon strong mitigations for my concerns raised above and those of my neighbors and the broader community raised during the EIR process.

—
Alexa Bach-McElrone
707.246.4596

driving leadership in the good economy

Dara Dungworth

From: tinkymoto@aol.com
Sent: Friday, December 8, 2023 1:54 PM
To: Sherri Metzker
Subject: Village Farms Proposed Development

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

Dear Davis City Council,

I am a 30 year resident of Davis and occupy the home my wife and I own in Davis.

Like the majority of voters, I opposed the permitting of Village Homes in the City election nearly 20 years ago. Now with the resurgence of Village Homes in the disguise (to those who have moved here more recently) of Village Farms, I oppose it again, as currently proposed.

Given the significantly increased traffic on Pole Line and Covell experienced over the last 20 years, this project needs to be significantly downsized before its possible desirability is investigated. Furthermore, it might be prudent to keep the downsized footprint out of the FEMA High Risk Flood Plain which now occupies much of the project.

Not unrelated to this topic is the observation that a significant number of family residences in Davis have been converted into rentals during the last few decades. Peripheral develops in Davis should not be driven by the fact that some older neighborhoods are turning into student dorms. UCD needs to stop balking at building markedly more student housing on campus. More student housing on campus will free up family homes in Davis which have become rentals, allowing them once again to be true family residences in long established Davis neighborhoods.

Thanks for your careful consideration in these matters.

James Flanigan
429 Scripps Drive
Davis, CA

Dara Dungworth

From: Vern Goehring <vern@cal.net>
Sent: Friday, December 8, 2023 4:28 PM
To: Sherri Metzker
Subject: Village Farms Scoping Comments

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

Sherry Metzker – I am a resident of the Cannery, living in the Gala Condominium community on Berryessa Lane since 2019. Please consider the following comments regarding issues that need to be addressed in a draft EIR:

- The presence of unique alkali vernal pools is well documented in recent onsite investigations by several UCD grad students, the “CA Natural Diversity Data Base,” and other sources. A recent publication: "Conservation of California’s Great Valley Vernal Pool Landscapes" <https://backcountrypress.com/book/conservation-of-californias-great-valley-vernal-pool-landscapes/> documents that the on-site vernal pool is a unique type that is different from the pools at the Jepson Prairie just west of Davis. Alkali vernal pools exist only as small areas within Sacramento and Colusa national Wildlife Refuges and Woodland Regional Park.
- Providing traffic access via the traffic circle in the Cannery will create numerous environmental impacts, my comments are supported by years of personal experience and observation:
 - The streets approaching and within the circle are narrow, such that in many cases vehicles are not able to stay within the designated traffic lane. Increasing the number of vehicles will significantly increase the risk to vehicles, bicycles and pedestrians.
 - Numerous condominium homes are within a few feet of the traffic circle, the increased traffic will significantly interfere with the quality of residents lives and the value of their homes.
 - Connecting the traffic circle to a residential development to the east will sever the urban farm land from the orchard and the barn where farm equipment and produce storage are maintained. The Cities concept and promise for the Cannery community, a Farm-to-Fork Community, will be unattainable and would likely need to be abandoned. Would current homeowners, who purchased eagerly anticipating this feature, have a claim against the City for undermining the master Cannery plan by it’s own actions?
 - I drive Covell Ave in this area nearly daily and any increase of traffic, much less the huge increase caused by nearly 1,500 additional homes, will be a significant increase in risk to vehicle, bicycle and pedestrian traffic.

In conclusion, I support increased housing, especially affordable housing, in Davis. However, the 30+ acres of vernal pools needs to be removed from the development footprint, donated to the City or other appropriate entity by the landowner and restoration initiated as mitigation for the remaining project. If the project goes forward, this will likely be the only vernal pool site within the City limits and needs to be preserved as a unique natural amenity to be enjoyed by residents and serve as an educational site for young and old alike. This would be entirely with in the Davis tradition of being sensitive to nature and the outdoors, supporting unique science, and considering the needs of it’s people. The vernal pools could be a tribute to the Whitcomb family’s longstanding and numerous contributions to Davis.

Thank you,
Vern Goehring

1000 Berryessa Lane #223

Dara Dungworth

From: Carroll Cook <carrollcook46@yahoo.com>
Sent: Friday, December 8, 2023 3:21 PM
To: Sherri Metzker
Subject: Village Farms

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

Hi, I would like to support the Village Farms development.

Davis needs more housing in all price ranges.

This group did extensive planning 20 years ago to come up with a great project. They have brought forth a revised plan that should be considered and not dismissed because a small but vocal group does not want Davis to change in any way.

Yes there will be more traffic, but that may be the price to pay in order to pay for the many expenses needed to provide the services that most people have come to expect.

Such as, police, fire departments, schools, parks, clean water, decent roads and green belts etc.

More residents equal more people to support our local businesses.

Current tax revenue apparently does not cover many of the city's expenses.

The recurring parcel tax for school is one example.

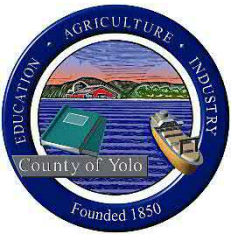
Our schools are not filled. Students from other areas come to our schools that we pay for.

The city pension deficit?? The new proposed fire house. How are these going to be paid for?

I do not have any financial interest in this project.

Respectfully submitted,

Carroll Cook



County of Yolo

DEPARTMENT OF COMMUNITY SERVICES

Leslie Lindbo, DIRECTOR

Planning, Building & Public Works

292 West Beamer Street
Woodland, CA 95695-2598
(530) 666-8775
FAX (530) 666-8156
www.yolocounty.org

Environmental Health

292 West Beamer Street
Woodland, CA 95695-2598
(530) 666-8646
FAX (530) 669-1448
www.yolocounty.org

Integrated Waste Management

44090 CR 28 H
Woodland, CA 95776
(530) 666-8852
FAX (530) 666-8853
www.yolocounty.org

December 8, 2023

VIA E-MAIL

Sherri Metzker, Community Development and Sustainability Director
City of Davis
SMetzker@cityofdavis.org

Dear Ms. Metzker:

The County of Yolo appreciates the opportunity to provide scoping comments on the Draft EIR for the proposed Village Farms Davis development application that includes annexation, general plan amendment, and pre-zoning. County staff would like to express gratitude for the opportunity to engage early with the City to address issues related to groundwater, agricultural mitigation, regional drainage and traffic, and expectations for revenue sharing. We hope that early consideration of the matters described below will help improve the EIR and the decision-making process surrounding the project.

The Village Farms Davis project proposes a mix of uses to accommodate a variety of residential densities, housing types, homeownership opportunities, recreational uses, and local commercial, educational, and public services. The approximately 390-acre project site includes all of APN 035-970-033, which is designated as Specific Plan in the Countywide General Plan and has been historically farmed in various rotating crops, and a portion of APN 042-110-029, which is designated and zoned by the County for agricultural uses. The Davis Drain, or "Channel A," traverses the project site, running west to east, through the northern portion of APN 035-970-033 and would be expanded and rerouted to result in more effective regional drainage.

The County notes that the project also appears to propose offsite project-related improvements on a majority of APN 042-110-029, north of the development, that are not otherwise described in Figure 2 of the Notice of Preparation (Project Site Boundaries), but are identified in the project's Drainage Infrastructure Exhibit (NOP Figure 11). These project-related features are described as groundwater recharge ponds for the purpose of restoring the regional aquifer within the area identified for agricultural mitigation. Information provided in the NOP indicates the offsite improvements could undergo site grading and excavation to construct the recharge ponds and that the groundwater recharge area would be used jointly by the City of Davis and the County.

The following comments identify topic areas the County requests to be addressed in the environmental assessment, which are germane to the County's mission to protect its interests in the unincorporated area.

AGRICULTURE

Agricultural Mitigation

The Village Farms Davis proposal identifies a majority of the adjacent northern parcel, approximately 162.12 acres of APN 042-110-029, along with APNs 042-110-019, -025, -026 and -027, to serve as

offsite agricultural mitigation. As noted above, the project also proposes to place groundwater recharge basins on the 162.12-acre portion of APN 042-110-029 as a beneficial use. The project description defines the basins as addressing climate change by managing stormwater for capture to increase groundwater recharge. Furthermore, the project proposal indicates the offsite basins could potentially benefit the drainage capacity of the City's H Street Pump station drainage shed and that public access may be provided to the area through the project site.

It is the County's understanding, after preliminary discussions with City staff and the project proponent, that the offsite improvements (which are to remain in the unincorporated area) are not essential to and/or are an unnecessary component of the project's overall drainage plan and, in fact, may be a separate project altogether. If the County's assumption is accurate, then the County questions whether these offsite improvements should be eliminated from the project proposal and project description prior to preparing the Draft EIR.

Instead, the developer may consider submitting a separate proposal with the County given the use is proposed for the unincorporated area. It has longstanding been the County's preference that all proposed project features (including offsite project-related features) be included in the annexation area. Otherwise, project-related features located outside the annexation area determined by the County to convert farmland will be required to comply with the County's Agricultural Conservation and Mitigation Program, which may be contrary to the project's overall ag mitigation proposal.

If the offsite features will be determined to enhance or provide an essential component to the development of the project, the County requests that the Draft EIR consider their relevance to the project, as well as assumptions for ongoing operations and maintenance responsibility. The study should also include an analysis of the underlying substrate and the basin's potential to recharge the aquifer. Additionally, the Draft EIR should study the viability of the recharge basins to be farmed at existing or better capacity and how allowing public access may affect agricultural operations (see comments under 'Agricultural Buffer', below). The Alternatives discussion should look at minimizing impacts to the agricultural capacity of the land by eliminating or reducing the size of the basins and prohibiting public access to prevent conflicts with permitted spraying operations.

Soil removal and/or stockpile locations related to construction of the project or excavation of the recharge basins should also be discussed in the Draft EIR, including where soil will be stored (permanently or temporarily), particularly if these locations will be outside the defined project boundaries or in the unincorporated area.

To fully compensate for any adverse effects of project features located outside the annexation area and provide meaningful mitigation for the loss of availability, utility, or use of that land, the County requests further study as to the impacts the proposed groundwater recharge basins will have on the farmland's current capacity to continue productive agricultural use. Agricultural mitigation should be commensurate with any diminished value of the land's current agricultural capacity. In addition, agricultural land that is not capable of development should not be used as mitigation for the project's impacts on agriculture.

Agricultural Buffer

Policies in the Countywide General Plan seek to protect existing farm operations from impacts related to the encroachment of urban uses through use of a minimum 300-foot buffer (Land Use Policy LU-2.1), which greatly increases the City's minimum standard cited in the Municipal Code. The County strongly urges the City to consider increased agricultural buffer requirements, particularly from environmentally sensitive areas, including residential areas and parks or public access to offsite

habitat areas, to accommodate the continued use of adjacent farming operations and permitted restricted spray applications. Any buffers should be incorporated in the project site -- i.e. neighboring agricultural lands should not be taken out of production to create the buffer.

Right-to-Farm

The County's Right-to-Farm Ordinance, codified in Chapter 6 of Title 10, Yolo County Code of Ordinances, should be considered in the Draft EIR for the purposes of protecting adjacent and nearby farming operations in the unincorporated area of the County.

HYDROLOGY

Davis Drain/Channel A

The Draft EIR should consider not only the proposed expansion and relocation of the Davis Drain at the project site, but the offsite regional effects of widening the channel as it outlets beyond the project site. Project effects on regional drainage must ensure offsite drainage does not increase beyond existing levels in the unincorporated area.

Floodplain Impacts

Portions of the project site and the area proposed for groundwater recharge are designated as 'special flood hazard area' and mapped by FEMA as being located within Flood Zone A. The Draft EIR should fully analyze flood impacts associated with development of new housing as well as how additional new development may impact adjacent housing and established neighborhoods. Excavation activities to develop the recharge basins on the adjacent northern parcel should also be studied to address offsite flood effects.

TRAFFIC

Impacts to County Roads

The Draft EIR should consider impacts to County Roads within the vicinity of the project, including, but not limited to, County Roads (CR) 102, 29, 28H, 32A, and 105. The analysis must assume that project resident-commuters will seek alternative routes via CR 28H and CR 29 to avoid traffic issues already associated with Covell and Mace Boulevards and that regional shopping in Woodland will attract additional travelers from this development along CR 102.

Also, with many motorists using navigational applications, drivers are being routed around Davis-proper through peripheral County Roads along the north and east sides of Davis. Though a significant distance from the project site, the County is concerned that traffic routed from the proposed development may also impact CR 32A in the area of Interstate 80.

OTHER CONSIDERATIONS

Groundwater Contamination

Concerns have been expressed about the leaching of contaminants from the old Davis landfill site, northeast of the proposed project, and whether these contaminants could spread throughout the aquifer. Reportedly, there is a lack of groundwater monitoring at the site, i.e., no monitoring wells exist along the western landfill boundary, and the landfill's waste boundary has yet to be determined. Due

to the proximity of the project's proposed housing in relation to the landfill, the County requests that the Draft EIR consider impacts associated with residual effects of the landfill, particularly with respect to increasing available groundwater recharge at the proposed mitigation site. Additionally, gas monitoring may be required at the landfill site for further investigation. Please refer to the NOP comment letter submitted separately by the Local Enforcement Agency, attached.

ALTERNATIVES

Reduced Footprint/Opportunities for Farmworker Housing

The Draft EIR should consider a reduced footprint alternative that defines the northern project boundary south of the existing Davis Drain and explores the opportunity for increased density, thereby maximizing housing options without compromising economic returns. Workforce housing, such as dedicated affordable housing for farmworkers, should also be considered as an essential regional need. Proposed annexation boundaries could remain as is and options for including the groundwater recharge basins north of the channel could be explored to remain within the proposed project site.

FINANCIAL CONSIDERATIONS

Although not a CEQA issue, the County looks forward to a productive discussion with the City regarding the necessary tax sharing agreement that would accompany an annexation. The scope and scale of this project will require a thoughtful tax sharing agreement in order to best ensure there is sufficient and equitable revenue to both the City and County so that the increased need for public services that may be associated with prospective phasing of the project and/or at build-out is adequately and properly addressed. We furthermore request that a jointly agreed-upon tax sharing agreement or the terms of other financing mechanisms, such as community facilities district, be in place prior to this project going before the voters for approval.

* * *

The County is appreciative of the opportunity to discuss and provide comments on the proposed Village Farms Davis project and hope that our dialogue with the City continues as the project progresses.

Sincerely,

Leslie Lindbo

Leslie Lindbo, Director
Department of Community Services

cc (via e-mail only):

County Supervisor Jim Provenza
Chief Administrative Officer Gerardo Pinedo
City Manager Mike Webb
City Principal Planner Dara Dungworth

Attachment: Local Enforcement Agency (LEA) comment letter, dated December 8, 2023



County of Yolo

DEPARTMENT OF COMMUNITY SERVICES

Environmental Health Division

292 W. Beamer Street, Woodland, CA 95695
PHONE - (530) 666-8646 FAX - (530) 669-1448

April Meneghetti, REHS
Director of Environmental Health

December 8, 2023

Sherri Metzker
Community Development and Sustainability Director
City of Davis
23 Russel Boulevard
Davis, CA 95616

RE: LEA COMMENTS FOR VILLAGE FARMS NOP OF DRAFT EIR

Dear Ms. Metzker,

Yolo County Environmental Health, acting as a Local Enforcement Agency (LEA), regulates solid waste facilities operating within Yolo County. The LEA has oversight over solid waste sites including closed, illegal, and abandoned landfills.

The closed City of Davis Landfill known as the Old Davis Landfill is located directly north of the proposed Village Farms Development. The Old Davis Landfill includes five unlined waste cells and stopped receiving waste in 1975. Current approved activities on the landfill property include a go-kart facility (built over waste cell 5), a paintball facility and City of Davis operation of stockpiling inert material such as soil and road base.

The proposed development project includes mixed-use development which would include residential housing and educational facilities. The LEA reviewed the Notice of Preparation for the Village Farms Development Project Draft Environmental Impact Report (EIR) and is requesting the following be reviewed in the EIR:

- 1.) Current solid waste regulations prescribe standards for construction of structures on closed landfill sites that are within 1,000 feet of a disposal area (27 CCR 21190[g]). The regulation does not prohibit development but contains standards that are designed primarily to prevent damage to the environmental control systems at the closed landfill and to protect the public health and safety from landfill gas migration. However, these regulations are only applicable to "onsite" development within 1,000 feet of a landfill footprint. Therefore, the LEA cannot enforce these regulations on adjacent parcels outside the established property boundary of the disposal site even if the proposed development is less than 1,000 feet from the landfill footprint.

2.) 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 is 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 at lower monitoring readings than 5% at the property boundary should the levels pose a significant threat to nearby development.

3.) 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.

Sincerely,

A handwritten signature in cursive script that reads "Suzie Dawley".

Suzie Dawley, REHS
Department of Community Services
Environmental Health Division/LEA

Cc: Dawn Liang, Cal Recycle, CIA Unit
Michael DeSmet, RWQCB



TO

Sherri Metzker

Community Development Director

12/8/2023

City of Davis

23 Russell Blvd, City Hall

Davis, CA 95616

Yolo Transportation District Comments re: Village Farms Davis EIR Scoping

Dear Ms. Metzker,

On November 6, 2023 The Yolo Transportation District (YoloTD) received the Notice of Scoping Meeting and Preparation of a Draft Environmental Impact Report for the Village Farms Project. As the consolidated countywide transportation services and congestion management agency, YoloTD appreciates the opportunity to comment on the project. We take this opportunity to share our thoughts on this proposed project based on our review of the submitted planning application and discussions that occurred between YoloTD, Unitrans, and the project applicants at a July 5, 2023 meeting. Our comments are limited to two areas directly related to YoloTD's interests: land use and transportation.

Overview of Current Transit Service. YoloTD currently offers limited public transportation service in the vicinity of the project. Prior to September 2022, YoloTD provided regular, intercity service between Woodland, Davis, W. Sacramento, and Sacramento with stops in both directions on Covell Blvd at the southern project boundary. In September 2022, that service was re-routed in accordance with our adopted Comprehensive Operational Analysis onto Fifth Street rather than heading north-/southbound at F Street in Davis. YoloTD's only other route currently serving the Village Farms vicinity is our Express Route 43/43R serving weekday peak commute trips between Davis and downtown Sacramento.

Future Transit Planning. The Covid pandemic greatly reduced transit ridership nationwide, including YoloTD, which resulted in suspending several routes. One example was the Spring Lake Express Route 243, which served Woodland commuters between Spring Lake and UC Davis via County Road 102/Pole Line Rd. YoloTD is soon launching a Short-Range Transit Plan (SRTP) update which will explore restoring and potentially expanding service along this route to accommodate Woodland-Davis travel needs, including service to the Woodland Gateway commercial center. If restored, this route is unlikely to serve the interior of the Village Farms development to 1) maintain travel time competitiveness and 2) due to the proposed Village Farms street layout.

Project Land Use. The planning application's Land Use Plan Exhibit illustrate the development's land use distribution by residential density type. Currently, the site layout locates medium- and

high-density residential units at the project’s southern boundary, which supports transit service on Covell Blvd. However, to maximize potential Woodland-Davis ridership along a restored Route 243 and existing Unitrans L Route, the site plan should also redistribute the northernmost medium- and high-density residential development to the project’s southeastern and eastern boundary, consistent with existing development east of Pole Line Rd. This is facilitated by repositioning Heritage Oak park from the southeast corner to slightly north and to the center such that the proposed park’s northwest corner becomes the southeast corner. Medium- and high-density residential uses should front Pole Line Rd (and Covell Blvd) and include supportive public transportation and multi-modal infrastructure meaningfully integrated into frontage improvements design, including welcoming bus shelters, pedestrian-scale lighting, Class I multi-use paths, secure bike parking, and drop-off areas for shared micromobility systems. The end effect is “wrap around” transit-supportive densities along Pole Line Rd and Covell Blvd project boundaries.

TDM/VMT Plan. The planning application’s Transportation and Circulation section describes the intended layout and facilities for the internal transportation system. Not mentioned, and perhaps more appropriate for the EIR analysis, is the project’s expected VMT generation. In a July 2023 meeting with project representatives, YoloTD staff communicated that VMT generation would likely be a significant impact in the EIR and that a proactive approach to address transportation demand for Village Farms residents would be needed to mitigate against those impacts. That is, addressing VMT passively through multi-modal supportive infrastructure within the site is inadequate mitigation.


In July, YoloTD recommended developing and implementing a transportation demand management (TDM) program to reduce the project’s VMT impacts. When combined with relocating the medium- / high-density residential to more transit-supportive locations, the project will not only perform better from a CEQA standpoint but also improves consistency with City transportation sustainability goals through intentional site design. A TDM plan should be developed by experts in the field, employ best practices, and require membership in the existing countywide TDM program, Yolo Commute, as a condition of approval and to assist with implementation.

The topics referenced in this letter provide some insight into our thoughts on this exciting development project. We look forward to collaborating with the City of Davis and the project applicant as it proceeds through the City’s development application process.

Sincerely,



Brian Abbanat
Acting Planning Director



(530) 402-2879
babbanat@yctd.org
350 Industrial Way
Woodland, CA 95776
YoloTD.org