



November 8, 2023

***Via Email Only***

The City of Davis Planning Commission  
PlanningCommission@cityofdavis.org

**Re: Public Comment on Item 6A for November 8, 2023 Planning Commission Meeting**

Dear City of Davis Planning Commissioners,

We submit this comment on behalf of our clients, Sacramento Housing Alliance and Jessica Marosky. First, we want to thank City Staff for incorporating many of our previous comments into Housing Element Version 3 and meeting with us to discuss the potential rezone sites. Additionally, we want to urge the City to consider their obligation to affirmatively further fair housing in the context of identifying rezone sites.

The identified rezone sites in Housing Element Version 3 do not affirmatively further fair housing. The City needs to rezone sufficient land to accommodate 496 lower income units because it did not timely adopt a legally compliant Housing Element. (*See* Gov. Code, § 65583, subd. (c)(1)(A), Gov. Code, § 65583.2, subd. (c).) At the same time, the City must take steps to “affirmatively further fair housing.” (Cal. Gov’t Code § 65583(c)(10).) The purpose of this requirement is to undo patterns of segregation and create opportunity for communities of color and other protected classes.

Here, the City identified several smaller sites with a capacity of 41 units or less. These sites are unlikely to attract affordable housing developers who need larger parcels to secure affordable housing financing. The remaining parcels are located in the Southeast section of the City, which is surrounded by already existing affordable housing complexes (i.e., New Harmony Mutual Housing Community, Owendale Community, Alhambra at Mace Ranch, etc.). Our clients have concerns that the City is funneling all of their multi-family affordable housing units into one section of the City. In summary, the current sites would perpetuate segregation and fail to affirmatively further fair housing.

If the City is unable to identify sites that would affirmatively further fair housing, the City must add programs to address this issue. For example, the City could commit to initiating a rezone or annexation that will increase affordable housing sites in the Northern and Western areas of the City or the City’s sphere of influence. Additionally, the City could require all new ADU’s to be

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A Legal Services Corporation Program 

deed restricted as affordable rentals for a minimum of 15 years. These programs would increase affordable housing availability in all parts of the City and avoid overconcentration in the Southeast portion.

Thank you for your consideration. If you have any questions about this comment, please do not hesitate to contact me at [bmansell@lsnc.net](mailto:bmansell@lsnc.net) and 530-662-1065.

Sincerely,

*Brielle Mansell*

Brielle Mansell  
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