

STAFF REPORT

DATE: October 6, 2026

TO: City Council

FROM: Sherri Metzker, Community Development Director
Tracie Reynolds, Open Space Program Manager

SUBJECT: Willowgrove Development - Agricultural Mitigation Land Proposal

Recommendation

Staff recommends that the City Council approve the attached resolution (Attachment 1) that approves at least 374 acres owned by Bullseye Ranches as the agricultural mitigation land for the proposed Willowgrove development project with the following general conditions:

1. All of the ag mitigation land must be land that is currently actively farmed, and cannot include any buildings or developed areas of any kind whatsoever;
2. The property owners must be willing to accept a conservation easement on only a portion of the property;
3. The Yolo Land Trust must be a co-owner of the conservation easement and be the party responsible for monitoring and enforcing it;
4. Any title issues need to be resolved;
5. The portion excluded from the agricultural easement will be the southeast portion of the property to maximize connectivity to existing protected land, unless that configuration is determined to be infeasible; and
6. The conservation easement must allow for potential habitat restoration activities in the northwest corner of the property, due to its proximity to Dry Slough.

Fiscal Impact

There is no fiscal impact associated with this proposed action. The appraisal that was required as part of this analysis, and the staff time involved in preparing this analysis and writing this staff report, are paid by the developer of the proposed Willowgrove development project as part of the project's agricultural land mitigation requirements. In addition, all costs associated with securing the future conservation easement on the Bullseye Farms property, including the negotiated purchase price, will be paid for by the developer. Moving forward with the conservation easement now is contingent on voters approving the proposed Willowgrove development project in November. Should the voters approve the project, the developer and staff will move forward with securing the conservation easement and it will ultimately be donated to the City and the Yolo Land Trust, who will monitor it on behalf of the City in perpetuity.

City Council Goals

The proposed action does not directly pertain to a specific City Council goal. However, the proposed action is consistent with several of the City's open space acquisition priorities and fulfills several programmatic goals, as described in the Strategic Plan for the City's Open Space Program, adopted by the City Council in March 2018.

Commission Input

The City's Open Space and Habitat Commission is required to: (1) recommend tentative approval of farmland mitigation proposals to the City Council, and (2) certify that the proposed mitigation land meets the requirements of the City's agricultural land mitigation ordinance (which is further discussed below). On September 14, the Commission discussed Willowgrove's proposed farmland mitigation proposal and approved a motion to recommend approval to the City Council. In addition, the Commission approved the following two additional motions:

1. *"The Open Space and Habitat Commission recommends that the portion of the Bullseye Farm property excluded from the farm easement should be the southeast portion of the property to maximize connectivity to existing protected land currently, unless it is not feasible," and*
2. *"The Open Space and Habitat Commission recommends that the conservation easement allow for potential habitat restoration activities in the northwest corner of the Bullseye Farm property, due to its proximity to Dry Slough."*

Staff concurs with these recommendations and have added these to the recommended conditions associated with this approval (See general conditions #5 and #6 above).

Background and Analysis

The proposed Willowgrove development project ("Willowgrove") is located on a 232-acre parcel located outside and adjacent to the City's northeastern city limits. It is bounded on the west by the existing Wildhorse neighborhood and the Palomino Place development, on the south by East Covell Boulevard, with existing residential beyond, and on the north and east by farmland. Channel A (a stormwater conveyance channel that begins west of the City near County Road 95A and runs east through the City and all the way to the Willow Slough Bypass) bisects the development site.

The existing Yolo County General Plan and zoning designations for the property are Agricultural (AG) and Agricultural Intensive (A-N). The proposed project includes residential uses (1,250 dwelling units in a variety of product types and densities), a



community park, a mini park, a neighborhood retail site, greenbelts, and an agricultural buffer. The project site is currently under the jurisdiction of Yolo County. As part of the project approvals, the entire 232.4 acres would be annexed into the City.

In May 2026, the City Council approved several discretionary land use entitlements in order for the Willowgrove project to move forward. These approvals are contingent upon a successful Measure J/R/D vote, currently scheduled for November 2026. The project also includes an Environmental Impact Report required under the California Environmental Quality Act that evaluated the project's environmental impacts.

The developer has requested approval of its agricultural land mitigation proposal early in the process (before the Measure J/R/D vote) so that if the project is approved by voters, the developer can move forward as fast as possible with the development.

Agricultural Land Mitigation Requirements

Pursuant to the City's farmland mitigation requirements, developers are required to mitigate for the farmland that will be lost as part of any urban development (See City Municipal Code Article 40A.03.070). The City's farmland mitigation ordinance requires developers to permanently protect at least two acres of agricultural land somewhere within the Davis Planning Area to "mitigate" for every acre of agricultural land they convert to urban uses (i.e., the 2:1 requirement). Permanently protecting the mitigation land usually means buying and donating a conservation easement on that land.

Developers must first preserve the land directly adjacent to their project. If this adjacent mitigation land is not enough to satisfy the 2:1 agricultural mitigation land requirement, then the developer must look elsewhere within the Davis Planning Area, called the remainder mitigation land. Both of these categories are briefly discussed below:

- ***Adjacent Mitigation Land.*** The developer must first protect the land along the entire non-urbanized perimeter of the project. This means that the developer must first protect any farmland adjacent to the project site. If the developer cannot protect this land for some reason, then the developer must either provide the adjacent mitigation land on the development site itself or provide alternative adjacent mitigation land that has a comparable monetary value to the land adjacent to the development project site, among other things. The adjacent mitigation land must be of a size that is economically viable as farmland (i.e., it must be a minimum 1/4 mile in width). Developers do not have to mitigate for the land being used as the required on-site agricultural buffer.
- ***Remainder Mitigation Land.*** If the adjacent mitigation land is not enough to satisfy the 2:1 agricultural mitigation land requirement, then the developer must look to protect land elsewhere within the Davis Planning Area. Incentives, or location-based "credits," are provided to the developer to protect land in areas targeted for permanent protection by the City, such as land within a quarter-mile of the City limits and land within "priority acquisition areas" as determined by the City Council. These priority acquisition areas currently include land adjacent to the city limits, land separating the City from neighboring cities, and land providing

particular agricultural, biological/natural and/or scenic benefits. The remainder mitigation land must have comparable soils and water availability to the development project site.

Ag Mitigation Requirements for Willowgrove

For Willowgrove, the developer needs to provide at least 374 acres of ag mitigation land, as shown in the table below, to satisfy the City's ag mitigation ordinance. Of those acres, staff has determined that 230 acres need to qualify as adjacent mitigation land and 144 acres need to qualify as remainder mitigation land, as further explained below.

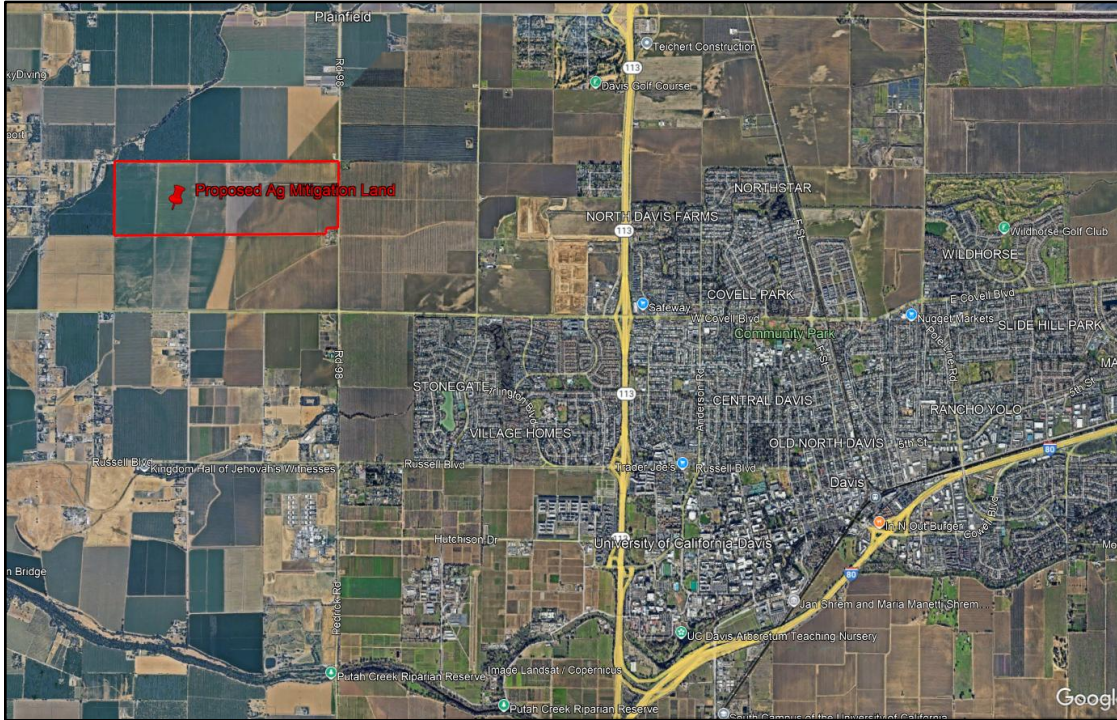
The southern and western borders of the project site are urbanized, but the northern and eastern borders are not urbanized, and remain in farmland, as shown on the map below. The green-shaded area on the map below is 230 acres, and represents an area a quarter-mile in width (the adjacent mitigation land requirement).



Under the City's ag mitigation ordinance, if the developer cannot preserve the agricultural land adjacent to the project site, the developer can propose alternative land that will satisfy the City's adjacent mitigation land requirement. To qualify as alternative adjacent mitigation land, the land must be (1) of comparable monetary value to the land that is adjacent to the project site, (2) strategically located, and (3) of a size that ensures continued farming. The developer is proposing alternative land to satisfy the project's adjacent mitigation land requirement, as discussed below.

Willowgrove's Ag Mitigation Proposal

The developer proposes to satisfy both the City's adjacent mitigation land requirement and the City's remainder mitigation land requirement with the same property: a 476-acre property owned by Bullseye Farms of Woodland (APN 037-040-001) located northwest of the city limits, less than one mile from the city limits, as shown on the map below.



A couple of recent photos of the property can be found below:



View from northwest corner



View from northeast corner

[Bullseye Farms](#) grows tomatoes, sunflowers, cucumbers and alfalfa on the property. In 2024, Bullseye Farms won the Agribusiness of the Year Award from the Woodland Chamber of Commerce for the company's excellence in leadership, innovation, and community involvement. Owned by the Beeman family, Bullseye Farms is recognized as an industry leader in regenerative agriculture and sustainable farming practices. The company regularly collaborates with conservation organizations such as the Yolo Land Trust, the Community Alliance for Family Farmers, the California Climate and Agricultural Network, the Center for Land-based Learning, and UC Davis.

Does this Property Qualify as Adjacent Mitigation Land?

To qualify as alternative adjacent mitigation land, at least 230 acres of this property must have a comparable monetary value to the land adjacent to the development project site. The monetary value is a gauge of development pressure.

The City hired Hackett Appraisal of Woodland to conduct appraisals of the three parcels adjacent to the proposed Willowgrove project, and the land owned by Bullseye Farms. The developer paid for these appraisals. The results are shown in the table below:

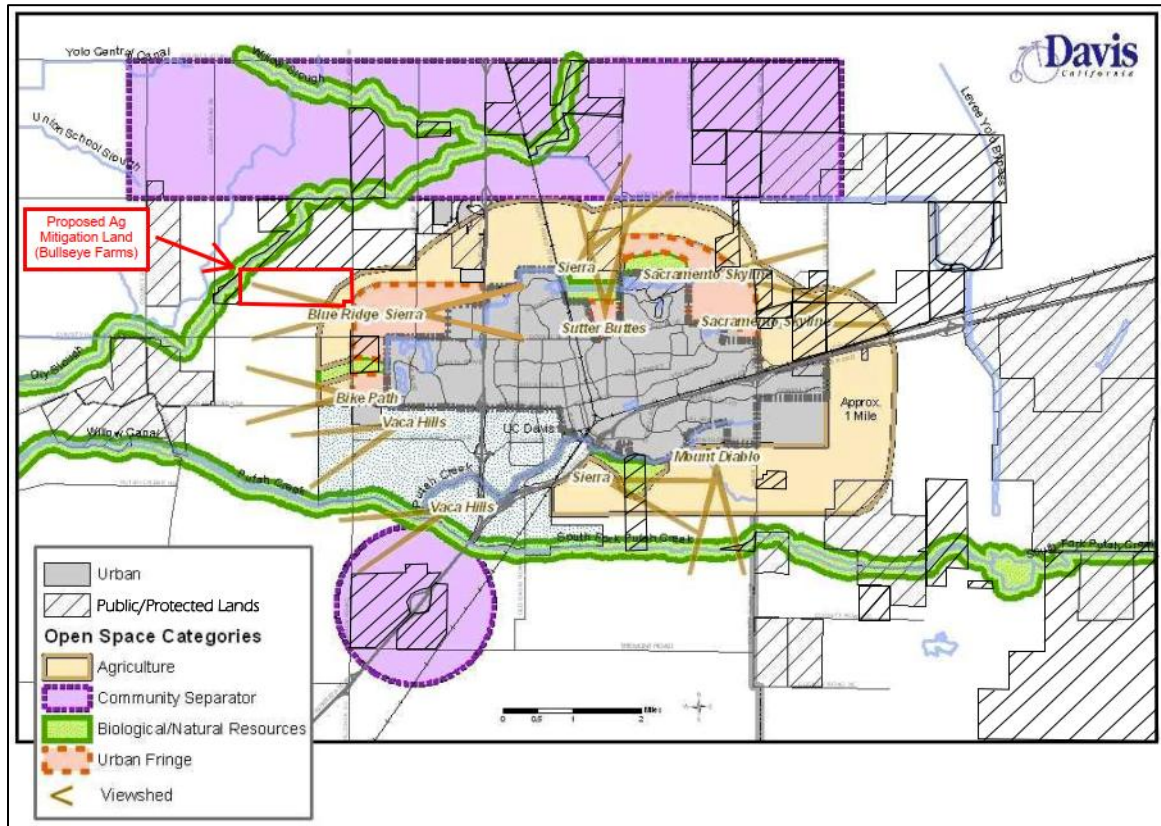
			Value	Acres	Value/Acre
Land Proposed as Project Ag Mitigation Land					
Bullseye Farms Property	APN 037-040-001		\$6,420,000	475.77	\$13,494
Land Adjacent to Willowgrove Project Site					
Dhir Property	APN 042-120-025		\$1,630,000	135.47	\$12,032
Gill Property	APN 042-120-029		\$2,000,000	153.77	\$13,006
Mariani Property	APN 071-130-002		\$3,220,000	189.52	\$16,990
		Average Value/Acre of Land Adjacent to Willowgrove			\$14,010

As shown in the table above, the monetary value (per acre) of the Bullseye Farms property is comparable to the average monetary value (per acre) of the three parcels adjacent to the Willowgrove project. All four properties have comparable soils and water supply, and are experiencing a similar level of development pressure. The property owned by the Mariani Nut Company, directly east of Willowgrove along Covell Boulevard, is the most likely to be developed, and therefore, has the highest value.

Also, to qualify as alternative adjacent mitigation land, the property must be strategically located, meaning it must provide one or more of the following: (1) it protects a locally unique resource, (2) it provides connectivity between existing protected or agricultural lands, (3) it provides protection of other lands and resources within the Davis Planning Area, and/or (4) it is located within a City-identified priority open space acquisition area. Staff believes the land owned by Bullseye Farms satisfies this requirement because:

- It provides connectivity between existing protected or agricultural lands. It is adjacent to three of the City’s existing conservation easements (McIssac Farm, Barger Farm, and Eoff Farm), and its northeast corner touches another protected property (Staib South, now Martinez Farm), as shown by the hatched areas on the map below, and
- It is located within three of the City’s priority acquisition areas: “Agriculture,” “Biological Resources,” and “Scenic Resources,” as shown on the map below. The property is classified as prime farmland and its southeast corner is within the “Agriculture” priority acquisition area. Dry Slough does not go directly through the property but the ecological corridor is directly adjacent and therefore a portion of

the property is within the “Biological Resources” priority acquisition area. Finally, the property is within the viewshed of the Blue Ridge Berryessa Natural Area and therefore within the “Scenic Resources” priority acquisition area.



Finally, the property must be of a size that ensures continued farming to qualify as alternative adjacent mitigation land. The property is large at more than 400 acres and therefore ensures continued farming.

For all these reasons, staff believes that 230 acres of this property can serve as the alternative adjacent mitigation land for the Willowgrove development project.

Does this Property Qualify as Remainder Mitigation Land?

To qualify as remainder mitigation land, the property must (1) be located within the Davis Planning Area, (2) be located within a City priority acquisition area (to earn the 1:1 location credit), (3) be of a size and shape to ensure an efficient agricultural operation in perpetuity, and (4) have similar soil quality and water availability. Staff believes the Bullseye Farms property satisfies these requirements as discussed below:

- **Location.** The Bullseye Farms property is within the Davis Planning Area and is located within three of the City’s priority acquisition areas, as discussed above.
- **Size and Shape.** The remainder mitigation land must be of a size and shape to ensure it can function in perpetuity as an “efficient agricultural operation.” As

shown on the previous maps, the Bullseye Farms property is 476 acres, which is larger than the minimum lot size for agricultural properties in Yolo County. The property is rectangular in shape. The proposed easement area will also be rectangular in shape, ensuring an efficient farm operation.

- *Water Quality and Water Availability.* The remainder mitigation land must also have comparable water quality and water availability to the project site. Staff have determined that the Bullseye Farms property actually has better access to water than the Willowgrove project site. There is only one ag well on the Willowgrove property and it pumps about 1,500 gallons per minute. The area north of Channel A (about 20 acres) does not have access to water at all and is dry farmed.

By contrast, there are three irrigation wells serving the Bullseye Farms parcel: two are located on the parcel itself and one is located on an adjacent parcel also owned by Bullseye Farms. The primary ag well currently pumps about 2,000 gallons per minute. The property owner recently drilled a second ag well on the property to prepare for the development of an almond orchard. This well is expected to pump about 2,500 gallons per minute.

The Bullseye Farms property is also within the boundaries of the Yolo County Flood Control and Water Conservation District, and therefore is eligible to receive district surface water through drainage ditches controlled by Bullseye Farms. In full allocation years, there is enough surface water to irrigate the entire ranch to industry standards. The ag wells provide back-up water sources in the event the surface water allocation is insufficient.

Both the Willowgrove project site and the Bullseye Farms property are located within the Yolo Subbasin which is under the jurisdiction of the Yolo Subbasin Groundwater Authority. The Yolo Subbasin is not identified by the California Department of Water Resources as being in a state of overdraft.

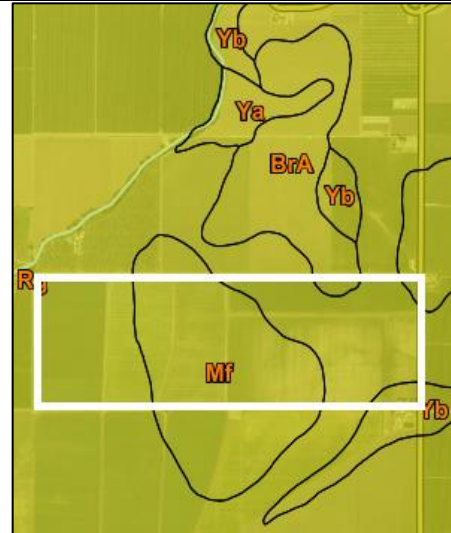
- *Title Issues.* The remainder mitigation land must not have any easements, or contamination, or physical conditions that make it impossible to develop into urban uses in the future. Staff has reviewed the title report for the Bullseye Farms property and has determined that it is free of any easements or other legal impediments to future urban development. Also, to the property owner's best available knowledge, the property is not contaminated.
- *Soil Quality.* The remainder mitigation land must have comparable soil quality to the project site. As shown on the maps below, the Bullseye Farms property has comparable soil quality to the Willowgrove project site.

Farmland Classification (Source: USDA Natural Resources Conservation Service)



Willowgrove Project

The Willowgrove project site is almost entirely comprised of prime farmland if irrigated, as shown by the yellow area on the above map. There are about 22 acres in the northeast corner of the site that are classified as farmland of statewide importance (Merritt complex, saline-alkali).



Bullseye Farms Property

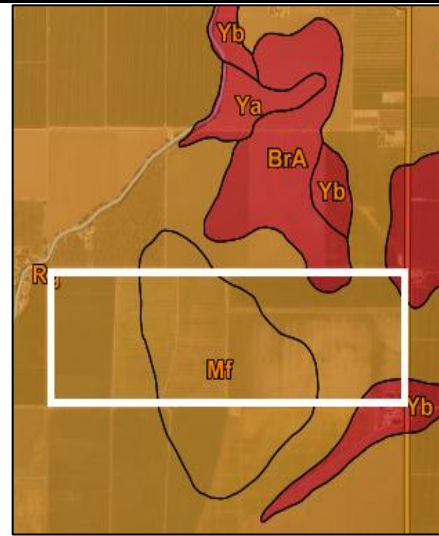
The Bullseye Farms property is entirely comprised of prime farmland if irrigated (Marvin silty clay loam and Rincon silty clay loam), as shown by the yellow area on the above map.

Irrigated Capability Class (Source: USDA Natural Resources Conservation Service)



Willowgrove Project

The Willowgrove project site is almost entirely comprised of Class 1 soils, as shown by the red area on the above map. Class 1 soils have few limitations that restrict their use. There is a finger of Class 2 soils (orange area) and the northeast corner of the project site is Class 4 soils (Merritt complex, saline-alkali).



Bullseye Farms Property

The Bullseye Farms property is almost entirely comprised of Class 2 soils (Marvin silty clay loam and Rincon silty clay loam), as shown by the orange area on the above map. Class 2 soils are comparable to Class 1 soils for farming in Yolo County. There are also a couple of pockets of Class 1 soils (red areas) on the property.

In addition, the Willowgrove development team performed an additional soils analysis for the Yolo Local Agency Formation Commission (“Yolo LAFCo”), which is an independent agency that, among other things, approves annexations into cities within Yolo County. The development team calculated two different soils scores for both the Bullseye Farms property and the Willowgrove project site: (1) the score under the Land Evaluation and Site Assessment (“LESA”) Model,¹ and (2) the California Revised Storie Index score.²

As shown in the table below, the Bullseye Farm property scores higher than the Willowgrove project site under both soil assessment models:

	LESA Model Score	Storie Index Score
Bullseye Farms Property	91.30	76.38
Willowgrove Project Site	79.51	65.11

Staff’s analysis of the project’s remainder mitigation land requirement is summarized in the table below:

Remainder Mitigation Land Requirement	Bullseye Farms Property
Is it located within the Davis Planning Area?	Yes
Is it located within a City priority acquisition area?	Yes (Agriculture, Biological Resources, Scenic Resources)
Does the size and shape of the easement area support an efficient agricultural operation in perpetuity?	Yes
Does it have comparable soil quality?	Yes
Does it have comparable water quality and availability?	Yes
Are there any title issues that preclude future urban development?	No
Is it qualified as remainder mitigation land?	Yes

Conclusion

Based on the analysis contained in this staff report, staff recommends that the City Council approve the above-described 374 acres owned by Bullseye Farms as the

¹ The Yolo County Agricultural LESA Model has been designed as a potential planning tool to assist in making decisions concerning the relative significance of agricultural land resources within Yolo County. The model itself is rooted in concepts originally devised at the federal level, but has been customized to address the unique agricultural resource issues of Yolo County.

² The Revised Storie Index is a rating system that assesses the productivity of soil from four characteristics: (1) degree of soil profile development, (2) texture of the surface layer, (3) steepness of slope, and (4) drainage class, landform, erosion class, flooding and ponding frequency and duration, soil pH, soluble salt content as measured by electrical conductivity, and sodium adsorption ratio.

agricultural mitigation land for the Willowgrove project with the following general conditions:

1. All of the ag mitigation land must be land that is currently actively farmed, and cannot include any buildings or developed areas of any kind whatsoever;
2. The property owners must be willing to accept a conservation easement on only a portion of the property;
3. The Yolo Land Trust must be a co-owner of the conservation easement and be the party responsible for monitoring and enforcing it;
4. Any title issues need to be resolved;
5. The portion excluded from the agricultural easement will be the southeast portion of the property to maximize connectivity to existing protected land, unless that configuration is determined to be infeasible; and
6. The conservation easement must allow for potential habitat restoration activities in the northwest corner of the property, due to its proximity to Dry Slough.

Attachments:

1. Proposed Resolution

**Attachment 1
Proposed Resolution**

RESOLUTION NO. 26-XXX, SERIES 2026

RESOLUTION (1) APPROVING AT LEAST 374 ACRES OWNED BY BULLSEYE RANCHES AS THE AGRICULTURAL MITIGATION LAND FOR THE WILLOWGROVE DEVELOPMENT PROJECT WITH THE GENERAL CONDITIONS OUTLINED IN THIS RESOLUTION AND (2) AUTHORIZING THE CITY MANAGER TO EXECUTE AN AGRICULTURAL CONSERVATION EASEMENT IN CONFORMITY WITH THIS APPROVAL, AS OUTLINED IN THIS RESOLUTION

WHEREAS, the proposed Willowgrove development project ("Willowgrove") is located on a 232-acre parcel located outside and adjacent to the City's northeastern city limits. The proposed project includes 1,250 dwelling units, a community park, a mini park, a neighborhood retail site, greenbelts, and an agricultural buffer. It is currently under the jurisdiction of Yolo County. As part of the project approvals, the entire 232.4 acres would be annexed into the City; and

WHEREAS, in May 2026, the City Council approved several discretionary land use entitlements in order for Willowgrove to move forward. These approvals are contingent upon a successful Measure J/R/D vote, currently scheduled for November 2026. The project also includes an Environmental Impact Report required under the California Environmental Quality Act that evaluated the project's environmental impacts; and

WHEREAS, as part of the project approvals, the developer is required to mitigate for the farmland that will be lost as part of the new urban development. The City's agricultural mitigation land ordinance ("Ordinance") requires developers to permanently protect at least two acres of farmland somewhere within the Davis Planning Area to "mitigate" for every acre of farmland they convert to urban uses. Permanently protecting the mitigation land usually means buying and donating a conservation easement on that land; and

WHEREAS, under the Ordinance, developers must first protect the land along the entire non-urbanized perimeter of the project. If the developer cannot protect this land for some reason, then the developer must provide alternative adjacent mitigation land that has a comparable monetary value to the land adjacent to the development project site, among other things. If this adjacent mitigation land is not enough to satisfy the 2:1 farmland mitigation requirement, then the developer must look elsewhere within the Davis Planning Area (the remainder mitigation land); and

WHEREAS, based on these requirements, staff has determined that the Willowgrove developer must provide at least 374 acres of ag mitigation land to satisfy the Ordinance's requirements. Of those acres, 230 acres must qualify as alternative adjacent mitigation land and 144 acres must qualify as remainder mitigation land; and

WHEREAS, the Willowgrove developer has requested approval of its agricultural land mitigation proposal early in the development process (before the Measure J/R/D vote) so that if the Willowgrove project is approved by voters, the developer can move forward as fast as possible with the development; and

Attachment 1
Proposed Resolution

WHEREAS, the developer proposes to satisfy the Ordinance's requirements by purchasing a conservation easement on at least 374 acres of farmland northwest of the City on farmland owned by Bullseye Ranches. The conservation easement would ultimately be donated to the City and the Yolo Land Trust, who would monitor it on behalf of the City in perpetuity; and

WHEREAS, staff has analyzed the Bullseye Ranches property, including its location, size, shape, comparable monetary value, soil quality, water quality, and water availability, and has determined that the property meets the Ordinance's requirements; and

WHEREAS, the Open Space and Habitat Commission is required to: (1) recommend tentative approval of farmland mitigation proposals to the City Council, and (2) certify that the proposed mitigation land meets the requirements of the Ordinance. On September 14, 2026, the Commission discussed Willowgrove's proposed farmland mitigation proposal and recommended City Council approval, along with additional recommendations that are included in this resolution; and

WHEREAS, the City Council has determined that the Bullseye Ranches property meets the Ordinance's requirements and can serve as the ag mitigation land for the Willowgrove development project.

NOW, THEREFORE, BE IT RESOLVED that the City Council of the City of Davis does hereby resolve as follows:

1. Approves at least 374 acres owned by Bullseye Ranches (portion of APN 037-040-001) as the mitigation acres required under Davis Municipal Code 40A.03 to mitigate for the loss of agricultural land associated with the proposed Willowgrove development project. Said 374 acres includes 230 acres that qualify as alternative adjacent mitigation land pursuant to Davis Municipal Code 40A.03.030 and 144 acres that qualify as remainder mitigation land pursuant to Davis Municipal Code 40A.03.035; and
2. Approves the following general conditions:
 - a) All of the ag mitigation land must be land that is currently actively farmed, and cannot include any buildings or developed areas of any kind whatsoever;
 - b) The property owners must be willing to accept a conservation easement on only a portion of the property;
 - c) The Yolo Land Trust must be a co-owner of the conservation easement and be the party responsible for monitoring and enforcing it;
 - d) Any title issues need to be resolved;
 - e) The portion excluded from the agricultural easement will be the southeast portion of the property to maximize connectivity to existing protected land, unless that configuration is determined to be infeasible; and
 - f) The conservation easement must allow for potential habitat restoration activities in the northwest corner of the property, due to its proximity to Dry Slough; and

Attachment 1
Proposed Resolution

3. Authorizes the City Manager to execute an agricultural conservation easement in conformity with this approval, in the form approved by the City Attorney, and make minor changes to all related transactional documents after consultation with the City Attorney.

PASSED AND ADOPTED by the City Council of the City of Davis on this 6th day of October, 2026, by the following vote:

AYES:

NOES:

Donna Neville
Mayor

ATTEST:

Zoe S. Mirabile, CMC
City Clerk