



REQUEST FOR COMMENTS

Date: 12/5/2023			
To: <input type="checkbox"/> CDFW <input type="checkbox"/> UCD <input type="checkbox"/> UCD (coms) <input type="checkbox"/> DJUSD <input type="checkbox"/> PG&E <input type="checkbox"/> YCCS <input type="checkbox"/> YC Planning <input type="checkbox"/> Unitrans <input type="checkbox"/> Caltrans <input type="checkbox"/> YC Envir. <input type="checkbox"/> Health <input type="checkbox"/>	Attn: Alex Funk Attn: Lucas Griffith Attn: Mabel Salon Attn: Bruce Colby Attn: pgeplanreview@pge.com Attn: Leslie Lindbo Attn: Stephanie Cormier Attn: Jeff Flynn Attn: Todd Rogers Attn: April Meneghetti	<input type="checkbox"/> Recology <input type="checkbox"/> YCTD/Yolo Bus <input type="checkbox"/> YSAPCD <input checked="" type="checkbox"/> LAFCo City of Woodland <input type="checkbox"/> Y/S County <input type="checkbox"/> Mosquito District YNHP/Yolo <input type="checkbox"/> Habitat JPA USPS, Davis <input type="checkbox"/> UP RR <input type="checkbox"/> <input type="checkbox"/>	Attn: Craig Johnson Attn: Daisy Romero Attn: Gretchen Bennitt Attn: Christine Crawford Attn: Cindy Norris Attn: Kevin Combo Attn: Charlie Tshudin Attn: Elisa Sabatini Attn: TBD Attn: TBD
From: Dara Dungworth, Principal Planner; (530) 757-5610 x 5882; DDungworth@cityofdavis.org Department of Community Development, Suite 2, 23 Russell Blvd, Davis, CA 95616			
File Number: Planning Application # 23-32, GPA# 02-23, PPD/Prezone# 02-23 , ANNEX# 03-23			
Project Name: Shriners Property			
Project Location: North of Covell Blvd and East of Wildhorse			
Project Description: A 234-acre annexation area proposed to include high-, medium-, and low-density residential with three high density sites (two market rate, one affordable) providing a total of 1,200 units. The proposal includes a community park with various facilities (17.2 acres), open space/ag buffer/passive nature area/greenways (52.2 acres), 2.0 acres of retail/entertainment/transit station, and future site improvements.			
<p>This is to request your general written comments on this development application on or before January 15, 2024. The Notice of Preparation (NOP) is anticipated to be reviewed and released by City Council in January and you will have an opportunity to comment on the scope of the EIR during the comment period.</p> <p>If you have any questions, please contact the project planner and comments should be returned to: Department of Community Development, Planning Division, Attn: Dara Dungworth.</p> <p>If no comments are received, it shall be assumed that the application conforms to your requirements. If you have no comments, please respond stating this.</p> <p>Your comments should be directed toward additional information (completeness) and land use topics while comments on the environmental aspects of the project as well as potential impacts that fall under your agency's purview can be reserved for the EIR scoping comment period.</p>			
Access the project materials here: Shriner's Property City of Davis, CA			
We have reviewed the above application and recommend the following: (attach separate comments, if needed)			
See attached.			
_____ No Comments		Date Returned: <u>01/04/2024</u>	
<u>X</u> Comments Attached		Signature: <u>Christine Crawford</u>	

To: Dara Dungworth, City of Davis Principal Planner
From: Christine Crawford, LAFCo Executive Officer
Re: LAFCo Comments on the Shriners Property Application
Date: January 4, 2024

Thank you for the opportunity to provide comments on the Project.

The Shriners Property Project is not included in the City of Davis' Sphere of Influence (SOI) and as such Yolo LAFCo cannot approve annexation unless amended. In addition, development of this site conflicts with numerous LAFCo Agricultural Conservation Policies 4.0 – 4.16:

<https://www.yololafo.org/files/15c90460d/LAFCo+Project+Policies-Updated+10.28.2021.pdf>

LAFCo policies state that development of urban uses within the SOI should be encouraged before any proposal is approved which would allow development outside of the existing SOI. **There is sufficient land available in the City's SOI (approximately 1,023 acres) that should be developed before any projects outside the SOI are considered.** This site contains Prime Farmland of the highest value and some smaller amounts of Farmland of Statewide and Local Importance.

In 2008, LAFCo adopted a larger SOI than that requested by the Davis City Council at the time. Even with the larger SOI, the Shriners Property was specifically taken out of the City's SOI for the reasons excerpted below (from the 2008 MSR/SOI pages 102-108 of the PDF):

Portions of the SOI to the east and west were removed because they are located on prime agricultural lands and are considered inappropriate for future urbanization within the next 20 years. Appropriate future growth, over the next 20 years, will be concentrated within four areas, with most significant growth in two large areas towards the north and northeast. In addition, the City's current Housing Element Update Steering Committee indicates that these sites are more ideal for the projected growth of the City. The proposed SOI promotes a compact city, thereby discouraging urban sprawl, while allowing for steady growth.

Ample land in the City's existing SOI remains available to accommodate needed growth for the next 10-20 years:

- The City's SOI adopted in 2008 included 996 acres of undeveloped land.
- LAFCo amended the City's SOI in 2022 adding another 102 undeveloped acres for the DISC 2.0 Project.
- Only 75 acres of this SOI land has been developed and annexed since 2008 for the WDAAC Project.

Therefore, 1,023 of undeveloped acres remains available in the City's SOI.

Please feel free to reach out if you have any questions. Please also see the attached email sent to the Davis City Councilmembers urging them to consider the SOI in the prioritization of new development proposals dated June 5, 2023.

Christine Crawford

From: Christine Crawford
Sent: Monday, June 5, 2023 3:03 PM
To: 'gpartida@cityofdavis.org'; 'bvaitla@cityofdavis.org'; 'warnold@cityofdavis.org'; 'jchapman@cityofdavis.org'; 'dneville@cityofdavis.org'
Cc: Mike Webb, City Manager; Sherri Metzker (SMetzker@cityofdavis.org); Kelly Stachowicz (kstachowicz@cityofdavis.org); 'Clerkweb@cityofdavis.org'
Subject: Yolo LAFCo Comments Re Draft Scoring Rubric Weight for SOI - Item 8

Davis City Councilmembers,

I've reviewed the Draft Scoring Rubric for Item 8 on the April 6th City Council agenda and want to express my strong concern that project location in the sphere of influence (No. 92) is weighted by only one point (i.e., the same value as a bus stop or sidewalk curb cuts). I realize current Councilmembers have not gone through a comprehensive LAFCo Sphere of Influence (SOI) Update process before, as it has not been done since 2008. I am therefore writing to convey the significant meaning and value of the SOI.

For background, an SOI is "a plan for the probable physical boundaries and service area of a local agency, as determined by the commission." (Government Code §56076.) Importantly, **an unincorporated area cannot be annexed into a city unless that area is within the city's SOI.** (Government Code § 56375.5.) State policy provides that new development should be steered to the existing jurisdiction or the existing SOI before going outside those areas, with a preference for non-prime farmland. (Government Code § 56377.)

A comprehensive update to the City of Davis' SOI was last completed in 2008 **following a 10-month long process which included comprehensive analysis of capacity and agricultural issues, public workshops, CEQA analysis, and public hearings.** SOI's are viewed as a type of land use entitlement and the first of a two-step process before LAFCo, with the second set being LAFCo's final approval of the annexation. Indeed, **it is beneficial to the City to prioritize annexations in the SOI, which have fewer legal barriers when compared to projects outside the SOI.**

Yolo LAFCo policies also reflect this strong preference for developing vacant land already within a city's existing SOI first (Yolo LAFCo Policy 4.1). The information required to expand a city's SOI would include justification of land demand for growth including the Regional Housing Needs Analysis (RHNA) (Yolo LAFCo Policy 6.5). The Policies also state land substantially surrounded by existing agency boundaries should be annexed before other lands (Yolo LAFCo Policy 4.4).

In sum, SOIs are a significant consideration for identifying the City's path for future growth. **I urge the City Council to amend the Rubric to weight the SOI with the significant value it deserves, especially as it applies to projects outside the City.**

Thank you for your consideration,
Christine

Christine M. Crawford, AICP
Yolo LAFCo Executive Officer
(916) 798-4618 – mobile
(530) 666-8048 – office