



YOLO
LOCAL
AGENCY
FORMATION
COMMISSION

December 4, 2023

COMMISSION
CHAIR
OLIN WOODS
Public Member

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

MARY VIXIE SANDY
Supervisor – 3rd District

NORMA ALCALA
Councilmember
City of West Sacramento

Re: Notice of Preparation for the Village Farms Davis Project Draft Environmental Impact Report (EIR)

BILL BIASI
Mayor
City of Winters

Dear Ms. Metzker:

LUCAS FRERICHS
Supervisor – 2nd District

Thank you for the opportunity to comment on the Notice of Preparation for the Village Farms Davis Project (the “Project”) Draft EIR. As you know, LAFCo will be a responsible agency for the Project and, if the Project approved by the City Council and its voters, LAFCo will rely on this EIR to process a subsequent Sphere of Influence Amendment and Annexation of the Project area to the City of Davis.

ALTERNATES
RICHARD DELIBERTY
Public Member

Yolo LAFCo’s scope of review will include items germane to our mission of providing efficient government services and protecting agricultural land and open space. As such, LAFCo requests that the issues below be addressed in the Draft EIR.

GLORIA PARTIDA
Councilmember
City of Davis

Orderly Development and Efficiently Extending Government Services

STAFF
CHRISTINE M. CRAWFORD, AICP
Executive Officer

Based on our December 1, 2023, meeting, my understanding is the proposed groundwater recharge basin is not required to retain Project-related storm water and not considered Project infrastructure, and therefore will be removed from the Drainage Infrastructure Exhibit (Sheet 11.3 dated 07/17/23). And if a groundwater recharge basin feature is to be provided, it will be part of the Project’s mitigation and/or overall benefits strategy. The Project applicants will be meeting with the Yolo Groundwater Sustainability Agency regarding the site’s suitability for a groundwater recharge pilot project.

TERRI TUCK
Administrative Specialist II/Clerk

Depending on what entity, if any, will operate and maintain the groundwater recharge basins in perpetuity, LAFCo recommends the Draft EIR be mindful of potential jurisdictional issues. Assuming these basins would remain in the unincorporated area, please ensure there are no jurisdictional or CEQA issues with the County issuing any necessary permits.

COUNSEL
ERIC MAY

Preserving Open-Space and Prime Agricultural Lands

625 Court Street, Suite 107
Woodland CA 95695

The Draft EIR should be consistent with Yolo LAFCo’s Agricultural Conservation Policies so LAFCo can rely on it as a Responsible Agency under CEQA without any additional evaluation. Yolo LAFCo Project Policies can be found for review on our website.¹

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- 1. Please pay close attention to policies 4.8 through 4.12, and 4.16. Impacts to agricultural resources from developing the Project itself, plus the continued productivity and viability of surrounding agricultural lands should be evaluated in the Draft EIR.

¹ <https://www.yololafco.org/files/15c90460d/LAFCo+Project+Policies-Updated+10.28.2021.pdf>

2. The Project materials indicate the area proposed for an agricultural conservation easement for mitigation purposes will also be compromised to some extent by the groundwater recharge basins. The extent to which the agricultural lands may be compromised should be discussed. Although Policy 4.10 indicates the Commission will not accept an agricultural conservation easement or property that is "stacked" or otherwise incompatible with viable agricultural activities and operations, since LAFCo's required mitigation ratio of 1:1 is 50% of the City's requirement of 2:1, LAFCo's mitigation policy would be satisfied regardless.
3. Regarding Yolo LAFCo Project Policy 4.16, please note that LAFCo uses a definition for prime agricultural land in state law that is different from what is more commonly used. The Draft EIR's evaluation of impacts to agricultural resources should be consistent with Yolo LAFCo's definitions of prime agricultural land as well.

Thank you again for consulting with Yolo LAFCo. If you have any questions, please feel free to contact me.

Best regards,



Christine M. Crawford, AICP

- c: Rochelle Swanson, Project Agent
Mike Webb, Davis City Manager
Dara Dungworth, City of Davis Principal Planner
Leslie Lindbo, Yolo County Director of Community Services
Stephanie Cormier, Yolo County Planning Manager