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Section 9: Housing Sites Analysis

9. HOUSING SITES ANALYSIS

Introduction

As required by State law, a Housing Element is to include an inventory of available land that is appropriately zoned and suitable for housing development to accommodate a jurisdiction's Regional Housing Needs Allocation (RHNA). This inventory for Napa County focuses on sites that are or can be made available for housing development affordable to households of varying income levels. This chapter summarizes the evaluation of potential housing sites, and the adequacy of these sites with their development capacities based on environmental and infrastructure constraints to address the County's regional housing needs for the 2023-2031 planning period.

Specifically, California law (Government Code Sections 65583 (a)(3)) requires that the Housing Element contain an inventory of land suitable for residential development, including vacant sites that can be developed for housing within the planning period and nonvacant (i.e., underutilized) sites having potential for redevelopment. State law also requires an analysis of the relationship of zoning and public facilities and services to these sites. While there is a limited amount of land in unincorporated Napa County with access to urban services such as water and wastewater utilities, the analysis presented in this chapter demonstrates that the County has sites to accommodate the County's housing allocation of 106 units, including housing at all income levels. Napa County is now considering six potential sites to accommodate the County's RHNA, the combined capacity of which greatly exceeds the County's RHNA. The County will revise or reduce the list of sites prior to finalizing the Housing Element Update for adoption, depending on comments on the Draft Housing Element Update from HCD, public feedback on the Draft Housing Element Update, the findings of the CEQA analysis being conducted for all of the sites, and further investigation of site feasibility for housing development.

Regional Housing Needs Allocation

The County's housing target for the 2023-2031 planning period is referred to as its Regional Housing Needs Allocation (RHNA). In the Bay Area, RHNA are assigned to each city and county by the Association of Bay Area Government (ABAG) Council of Governments for the eight-year planning period and includes housing units for specified income groupings. The County's RHNA as of March 2022 is shown in Table 45 below, and reflects ABAG's March 17, 2022 approval of RHNA transfers between the County and the cities of Napa, American Canyon, and St. Helena.

Table 45: Unincorporated Napa County Regional Housing Needs (RHNA) Allocation**a**

Summary Info	Units by Income Group				Total Units
	Very Low	Low	Moderate	Above Moderate	
RHNA Allocation ^a	45	16	14	31	106
Percent of Total	36%	21%	12%	31%	100%

NOTES: ^a The RHNA allocation shown here was adopted by ABAG on March 17, 2022 with the approval of requested transfers pursuant to California Government Code Section 65584.07. SOURCE: ABAG, March 2022.

Summary of Capacity to Accommodate RHNA

The total realistic development capacity of the unincorporated county, including all sites identified in this chapter, is shown in Table 46 below. The total realistic capacity reflects 230 currently vacant parcels that can accommodate single family homes, projected development of 72 accessory dwelling units (ADUs) over the eight-year planning period, and 483 units on sites that have been identified for rezoning to provide for minimum densities of 20 dwelling units per acre, the “default density” provided in Government Code Section 65583.2(c). In addition to considering the aggregate number of units that the sites can accommodate, this chapter considers the potential for the sites to accommodate housing that is affordable to all income levels, as discussed later in this analysis within the “Evaluation of Sites to Accommodate Varied Income Levels” section.

Table 46: Summary of Capacity to Accommodate RHNA

Summary Info	Units by Income Group			Total Units
	Very Low and Low	Moderate	Above Moderate	
County RHNA	61	14	31	106
Single-Family Residential Development Potential ¹	0	0	230	230
ADU Projection	16	24	32	72
Capacity on Identified Sites				
Spanish Flat	100	0	0	100
NE of Napa – Bishop 1	100	0	0	100
NE of Napa - Altamura	58	0	0	58
NE of Napa – Big Ranch Corner	25	0	0	25
State Owned Site (Imola Ave)	100	0	0	100
Foster Road 2	100	0	0	100
Subtotal of Identified Sites	483	0	0	483
Total Unit Potential	499	24	262	785
Surplus (+) / Deficit (-) from RHNA	+422	+10	+231	+377

SOURCE: Environmental Science Associates, March 2022.

¹ May include a limited number of pipeline projects (i.e., applications on file).

In total, this 6th Cycle Housing Element Sites Inventory identifies sites that will be rezoned to accommodate development of 483 units. Specifically, the County can accommodate its RHNA allocation for very low and low-income households by:

- Rezoning one site in the Spanish Flat area with a modified version of the Affordable Housing Combining District (AHCD) that applies elsewhere in the Spanish Flat area.
- Rezoning three sites Northeast of the City of Napa and one in the Foster Road area to Residential Multiple (RM) district and adjusting the development standards that would apply.
- Including a surplus State-owned site on Imola Avenue proposed for development of affordable housing.

Within the AHCD and RM zoning districts, rezoning would require a minimum density of 20 dwelling units per acre so the sites would accommodate housing affordable to lower income households. More information regarding the sites is provided below.

Sites Selection Process

The County undertook its site selection process by closely examining areas of the unincorporated County with access to water and wastewater utilities, by gathering input from residents and members of the Housing Element Advisory Committee, as well as by using

Geographic Information Systems (GIS) mapping software from multiple datasets to identify potentially available housing sites. To complement the existing knowledge base of County staff regarding potential sites, the County started with three primary data sources: 1) the sites included in the prior Housing Element inventory, 2) all County parcel data, and 3) housing sites identified as part of prior analysis of vacant and underutilized (i.e., non-vacant) parcels created by ESA in 2018 in anticipation of the Housing Element Update. The 2018 parcel inventory was created using assessor land use codes to identify a selection of sites within the unincorporated County that were zoned or could be zoned to allow for residential development. The team then used online mapping tools, including Google Earth and Google Street View, to verify vacant and underutilized status as identified with County parcel data.

All parcels considered for inclusion in the sites inventory were reviewed for any known environmental constraints, such as flood zones, fire hazard severity zone proximity, steep slopes, and other possible constraints to development feasibility. The County also screened sites prior to inclusion in the inventory to remove parcels that are currently occupied by residential uses. None of the sites are known to have been occupied in the past five years with housing occupied by lower-income residents.

The project team developed the initial inventory of sites over a series of working sessions and verified the sites to be included within the inventory. As staff members have specific knowledge of the current projects in the pipeline and development interest in certain areas of the County, the project team was able to determine the status of each site, access to infrastructure, the likelihood for residential development, and provided feedback on the density and buildout assumptions. Specific parcels were removed because of known site constraints, such as drainage or lack of access, and additional sites were added. Once all sites had been verified, the County applied agreed-upon assumptions to the available sites to calculate housing capacity and confirmed that the calculations resulted in realistic capacity numbers. On certain parcels, particularly large parcels, the County identified a subset of the parcel for rezoning as the developable housing “site” and modified the assumptions to reflect more realistic capacity numbers. Additional methodology regarding site size and capacity can be viewed in Section 2.1.4 General Evaluation Considerations and Section 2.2 Realistic Capacity Evaluation.

Methodology/Evaluation of Possible Sites

To meet its RHNA requirement, the County has evaluated a variety of methods for the identification of housing inventory sites including the evaluation of:

1. Continued development of single-family homes and accessory dwelling units (ADU)
2. Sites from prior Housing Elements
3. Potential sites for lower income housing with access to urban infrastructure (primarily water and wastewater services)

Throughout the iterative evaluation process with input from residents, stakeholders, and members of our Housing Element Advisory Committee it became evident that the most viable sites identified in this analysis, based on HCD requirements, would be those sites ultimately identified for multifamily housing. In identifying potential sites, the County used the following screening criteria as a guide for site selection:

1. Sites must have access to existing or planned water, sewer, and other dry utilities with sufficient capacity available to support housing development (*State requirement*)
2. Sites must generally be between 0.5 and 10 acres in size (*State requirement*)
3. Sites must be located outside of areas designated Agricultural Resource or Agriculture, Watershed & Open Space as of September 28, 2007 (the date specified in Measure P, approved by the voters in November 2008). Notwithstanding this requirement, sites within an area designated Agricultural Resource or Agriculture, Watershed & Open Space may be identified for qualifying farmworker housing development and sites identified as an existing commercial establishment on General Plan *Figure AG.LU-2: Location of Parcels Subject to Policy AG/LU-45* may be identified for redevelopment. (*Local Requirement*)

In addition, with input from residents, stakeholders, and our Housing Element Advisory Committee, the County identified a goal to identify sites that are:

1. Located outside of high and very high fire severity zones as designated (in State Responsibility Areas) or recommended (in Local Responsibility Areas) by CalFire
2. Located outside of Zones A through D of the applicable Airport Land Use Compatibility Plan
3. Proximate to transit routes and/or employment opportunities and services (e.g., groceries) where possible

Evaluating Adequacy of Single Family Residential and RHNA Progress

As part of the process for evaluating the adequacy for residential development within unincorporated Napa County, a GIS exercise was conducted to look at existing parcels with potential for development of single-family homes. The County’s General Plan and zoning ordinance permit construction of one single family home on each legal lot, except for areas that are zoned for industrial use. The GIS analysis considered residentially allowable parcels that are vacant (no building on site) and that are deemed buildable based on road access and slope. As a result, this analysis notes potential development of up to 230 single family homes on currently vacant parcels, with the assumption that these homes would provide market rate (rather than affordable) housing suitable for above moderate-income households.

In addition to the sites presented in the sites inventory to accommodate RHNA, the County may also consider those projects that could be built during the projection period and count those units towards the County’s RHNA progress. The County has a number of single-family applications that may be approved during the planning period, and therefore may count towards the County’s RHNA. However, as these applications are for single-family homes, they are assumed to be accommodated within the estimate of 230 units as provided above.

Accessory Dwelling Units

Further evaluation of parcels designated for residential uses considered the development trends of Accessory Dwelling Units (ADUs) and the projected number of units to be built within the planning period. ADUs and Junior Accessory Dwelling Unit (JADUs) are small, self-contained dwelling units that provide a kitchen, bathroom and sleeping area. The unit can be attached to the main home with a separate entrance or can be a small, detached unit in the rear yard or above a garage. Frequently smaller in size, ADUs typically rent for less than apartments, and can provide affordable rental options for smaller households, and can provide rental income for the homeowner. The County’s zoning permits one ADU and one JADU per parcel within residentially and Agricultural Watershed (AW) zoning. One JADU is permitted in Agricultural Preservation (AP) zoning. HCD guidance suggests that the County may assume that ADUs and JADUs continue to develop at the same pace and affordability levels that has occurred over the last three years. During that same time span, 34 ADUs and JADUs were permitted in Napa County as shown in Table 47 below.

Table 47: Accessory Dwelling Units Permitted in Prior Housing Element Cycle

Year	2018	2019	2020	2021	Total
Building Permits Issued	16	10	8	15	49

Based on the annual average of 12.25 ADU permits per year since 2018 and considering the results of a County survey of existing ADUs (as well as the results of ABAG’s survey data) to distribute the projected units by income category as shown in Table 4 below, the County is projecting a yield of approximately 72 ADUs being permitted at a range of income levels over the eight-year planning period of the HEU. While this analysis anticipates that the recent rate of

ADU and JADU production will continue, Napa County will continue to make improvements to its ADU processes, public education, and policies in the coming years to further advance ADU and Junior ADU development (for more information, see the Policies & Programs section of the Housing Element).

Table 48: Accessory Dwelling Units Projected Over the Planning Period

Income Category	Very Low	Low	Moderate	Above Moderate	Total
Total ADUs	8	8	24	32	72
Percentages	12%	10%	33%	45%	100%

Evaluating Sites from Prior Housing Element(s)

Table 49 below provides a summary of all prior sites identified in the 5th cycle Housing Element Sites Inventory. None of these prior Housing Element sites have been identified as part of the 6th cycle inventory to accommodate the RHNA for the 2023 to 2031 planning period..

Table 49: Napa County Summary of Sites from Prior Housing Element

Site	APNs	Acreage	Zoning	General Plan	Realistic Unit Capacity Total	Reuse Site for 6 th Cycle?
Angwin						
Site A	024-410-007	11.4	AHCD	Urban Residential	114	N
Site B	024-080-029	7.00	AHCD	Urban Residential	77	N
Moskowite						
Site A	032-150-062	1.00	AHCD	Rural Residential	3	N
Site B	032-150-063	2.00	AHCD	Rural Residential	6	N
Site C	032-150-048	20.8	AHCD	Rural Residential	83	N
Site D	032-150-047	11.4	AHCD	Rural Residential	45	N
Napa Pipe						
Sites A & B	046-412-005 046-400-030	20.0	Napa Pipe Residential	Study Area	304	N
Spanish Flat						
¹ Site A	019-261-038	1.50	AHCD	Rural Residential	7	N
¹ Site B	019-261-035	6.89	AHCD	Rural Residential	68	N
Site C	019-261-026	1.70	AHCD	Rural Residential	8	N
Site D	019-261-025	0.90	AHCD	Rural Residential	4	N
Site E	019-262-001	3.00	AHCD	Rural Residential	15	N
Site F	019-050-003	8.10	AHCD	Rural Residential	40	N

Notes: ¹ Sites that were considered for inclusion within the 6th cycle Sites Inventory but removed as part of the evaluation process.

Overall, the sites from the County’s 5th cycle housing element were not carried forward because those sites were deemed unlikely to develop in the planning period due to either existing

development at the site or wildfire hazards and/or housing losses in the area being of concern. More specifically, one particular site included in the County's 5th cycle was the Napa Pipe site, which has been annexed to the City of Napa. While this site is no longer available to the County, pursuant to Government Code Section 65584.08, the County will report affordable units produced on the site in its Annual Progress Report (APR) each year. The prior identified sites, as listed in Table 5 above, were not considered adequate to accommodate lower income needs for the 6th cycle and were not carried forward for this 6th cycle sites inventory. However, to make these sites more attractive for development in the 6th Cycle, the 2023 to 2031 Housing Element Update includes Program H-2g which calls for evaluating and modifying (i.e., reducing) the affordable housing requirements on the AHCD sites established in the 5th Cycle or earlier.

General Evaluation Considerations

In addition to reviewing sites from prior Housing Elements and opportunities for single-family residential sites, the sites inventory analysis also looked at general evaluation considerations discussed in this section. Identified sites include both vacant and non-vacant sites that have access to (existing or planned) infrastructure and meet a variety of criteria that make them candidates for residential development during the 6th Cycle planning period. The following considerations are covered in this section:

- Infrastructure Availability
- Environmental Constraints including outside very high fire severity zones
- Residential uses
- Site Size
- Public/Private partnerships
- Proximity to transit, employment, and amenities

INFRASTRUCTURE AVAILABILITY

The availability of utility infrastructure to a site was one of the main evaluation considerations when working to identify sites for the inventory. Infrastructure availability includes both wet and dry utilities with priority placed on those infrastructure needs for water and wastewater services. As much of unincorporated Napa County does not have access to water and wastewater services, the evaluation of sites was constrained to focus only on those areas of the County where such services are available or could be provided based on proximity to existing services nearby. While several of the sites identified do not currently have water and sewer services available onsite, housing development on the site would be able connect to existing utilities via nearby infrastructure with the approval of agencies with jurisdiction. The Sites Inventory spreadsheet in Appendix D as well as the summary of development sites in the Sites Inventory subsection contains information on the status of water and sewer services for each site.

ENVIRONMENTAL CONSTRAINTS

The analysis of environmental constraints includes a review of all parcels (or portions of parcels) identified in the inventory to determine possible constraints such as fire hazard severity zones, slope ratios, and other possible constraints to development feasibility. While there is an

added cost, fire constraints can be mitigated through design and all sites in the inventory have been deemed suitable for residential development as they fall outside of the very high fire hazard severity zones and are buildable lots with none of the identified parcels encumbered by a Williamson Act contract. Further review of environmental constraints include proximity to Airport Land Use Zones which was considered as part of the sites inventory review process and eliminated sites within zones A through D of the Airport Land Use Compatibility Plans.

RESIDENTIAL USES

Areas with the greatest potential for residential development during the planning period were evaluated to determine if they could accommodate housing at 20 du/ac with rezoning, focusing on areas with a General Plan land use designations allowing residential uses. Additional local requirements were considered to find sites located outside of areas designated Agricultural Resource (AR) or Agriculture, Watershed & Open Space (AWOS). This consideration was based on a requirement established by County Measure P which prohibits urban uses in areas designated AR or AWOS in the General Plan as of September 28, 2007.

SITE SIZE

Per State law, sites smaller than half an acre or larger than 10 acres are not considered adequate to accommodate lower income housing need unless it can be demonstrated that sites of equivalent size were successfully developed during the prior planning period, or other evidence is provided that the site can be developed as lower income housing.

- *Large Sites* - There are five identified sites on parcels over 10-acre in size. However, only a portion of those larger sites are being proposed for inclusion in the sites inventory, with the sites being specifically rezoned to allow for only the vacant portion of the parcel to be developed as a site. All sites in the inventory will accommodate lower income units, with all sites zoned to require minimum densities of 20 du/ac. In most cases a five-acre portion of the larger parcel is proposed for rezoning to either an Affordable Housing Combing District (AHCD) overlay zone or a Residential Multiple (RM) zone, allowing for development on the vacant and least-constrained portion of the parcel.
- *Small Sites* - While the sites inventory does not include any identified sites that total less than one half acre, a screening of individual parcels less than one-half acre was considered for possible parcel consolidation. However, this approach was not carried forward as more effective parcels for development were identified.

HOUSING SITES CONTROLLED BY AN EXEMPT ENTITY

As part of the site selection process, a review of possible parcels controlled by exempt entities was conducted. Sites located on land controlled by exempt entities (such as State, Federal, or Tribal) are considered differently from housing capacity planned on sites controlled by the County. In these instances, the County has limited control over the planning and decision-making processes of the site and so demonstrating “sufficient certainty” for housing development can be inexact. Ultimately the goal of analyzing such sites is to determine if an

exempt entity could develop housing within the planning period to meet (or lessen) the requirement for the County to identify adequate sites to meet its RHNA. For planned housing on exempt-entity sites, HCD allows RHNA credit when documentation is provided that demonstrates the likelihood that the planned housing can be developed within the current RHNA/housing element.

One site is included in the County's sites inventory that is owned by an exempt entity, State of California Department of General Services (DGS). Specifically, DGS has included 20.34 acres of surplus property accessed via Imola Avenue on its Real Estate Excess State Property map, with the Department of State Hospitals identified as the agency with jurisdiction. Based on conversations with staff of DGS, a five-acre site in this area is likely to develop with housing affordable to lower income households during the planning period.

Potential Use of the Adequate Sites Alternative (65583.1(c))

As a possible approach, there are some conditions under which the County could address up to 25 percent of its adequate sites requirement by substantially rehabilitating existing units, converting existing units to affordable units, or where existing unit affordability is preserved (including mobile home spaces). Examples include conversion of hotels or motels to residential use and making them available for people experiencing homelessness or by preserving a mobile home park via acquiring spaces. While this option was considered as part of the site evaluation process, the County determined that this alternative approach would not be viable in meeting the general evaluation considerations or needed to accommodate the County's RHNA.

Inventory of Suitable Land (65583(a)(3), 65583.2)

Government Code sections 65583(a)(3) and 65583.2 require that the County's inventory of land suitable for residential development shall be used to identify sites throughout the community that can be developed for housing within the planning period and that are sufficient to provide for the jurisdiction's share of the regional housing need for all income levels. The inventory of suitable land must also look at criteria for vacant and underutilized sites as outlined below:

- Vacant sites that are zoned for multifamily development
- Vacant sites that are not zoned for multifamily development, but that allow such development
- Underutilized sites that are zoned for residential development and capable of being developed at a higher density or with greater intensity
- Sites that are not zoned for residential development, but can be redeveloped for and/or rezoned for multifamily residential development
- Sites owned or leased by the County that can be redeveloped for multifamily residential development within the housing cycle
- Sites controlled by the State, a city/county, or another public agency where there is agreement/documentation that the site can be developed within the housing cycle
- Non-vacant sites require additional justification, and the bar is even higher if more than 50% of lower income RHNA will be accommodated by non-vacant sites.

As provided in section 3.0 "Draft Sites Inventory," each site identified as part of the Housing Element Sites Inventory has been outlined and a suitability analysis has been provided with a

“Description of the and Factors Supporting Development” at the site, including infrastructure considerations, environmental constraints, and developer interest.

Sites for Rezoning

Government Code section 65583.2(h) requires that if sites are identified for rezoning to accommodate a lower income RHNA shortfall they must fulfill the following requirements:

- Permit owner-occupied and rental multifamily uses by right for developments in which 20 percent or more of the units are affordable to lower income households.
- Permit the development of at least 16 units per site.
- Ensure sites permit a minimum of 20 dwelling units per acre.
- Ensure a) at least 50% of the shortfall of low- and very low-income regional housing need can be accommodated on sites designated for exclusively residential uses, or b) if accommodating more than 50% of the low- and very low-income regional housing need on sites designated for mixed-uses, all sites designated for mixed-uses must allow 100% residential use and require residential use to occupy at least 50 percent of the floor area in a mixed-use project.

A rezone program has been included in the Housing Element under Program H-4g to fulfill the above requirements. As presented at the end of Section 3.1, Summaries of Development Sites in Table 7, the County has identified a total of five sites for rezoning to accommodate the Napa County’s RHNA for the 6th cycle. More than half of Napa County’s shortfall in its lower income RHNA will be accommodated on sites designated for exclusively residential use and no sites will be considered mixed use, therefore the County will not be subject to requirements to allow 100 percent residential on mixed use sites.

Affordable Housing Overlay

Affordable housing or zoning overlays are a zoning tool that allows jurisdictions to modify existing zoning to allow for or require certain types of residential development, or development at certain densities, on a parcel without modifying the standards of the underlying zoning district. As part of Housing Element Program H-4g, one of the identified sites will be rezoned in Napa County to include an Affordable Housing Combination District (AHCD) in proximity to an already established AHCD zone, which would require minimum densities of 20 du/ac, with a maximum density of 25 du/ac. Current provisions in Municipal Code Section 18.82.040 regarding the AHCD zone would be amended to include this requirement. AHCD allows for a site specific approach for those sites where we expect multi-family housing to be affordable to lower income households. The County has proposed the AHCD zone for use at the Spanish Flat site because existing parcels in that community have the same zoning, and the ordinance can easily be refined to provide updated development standards for those parcels.

Residential Multiple Zoning

Napa County’s Residential Multiple (RM) zoning has been a zoning district with limited application within the County to date, and therefore represents an opportunity for use in defining density and development standards applicable to sites identified in proximity to the City of Napa. As part of Housing Element Program, H-4g identified sites will be rezoned to the

RM district, which will be modified to require minimum densities of 20 du/ac, with a maximum density of 25 du/ac, and to adjust applicable development standards as needed to encourage provision of housing affordable to lower-income households.

Realistic Capacity Evaluation

As required by Housing Element statute, local governments must analyze available sites based on their realistic residential development capacity. This means that the development density that can be achieved on a site might be less than the maximum residential densities permitted by the underlying General Plan land use and zoning. Therefore, to establish realistic capacity, jurisdictions must consider several factors when looking at vacant and underutilized sites where housing is an allowed use. These factors include:

- Land use controls and site improvements
- Site use and if vacant or non-vacant
- Site size and realistic development capacity
- Typical densities of existing or approved residential development at similar affordability levels
- Current or planned availability and accessibility of sufficient water, sewer, and dry utilities
- Incentives for residential use
- Local or regional development trends

In addition, for any sites that are less than 0.5 acres or greater than 10 acres, the County's Housing Element must provide an analysis demonstrating the ability to develop the site with housing during the planning period. Evidence can include developer interest, a development proposal, or a track record consolidating and/or developing sites of similar size. Further, within the County must also include policies or incentives within the Housing Element to facilitate development of the identified sites.

As provided in section 3.0 "Draft Sites Inventory," each site identified as part of the Housing Element Sites Inventory would be greater than 0.5 acres and smaller than 10.0 acres, and a suitability analysis has been provided with a description of the factors supporting development at the site, including infrastructure considerations, environmental constraints, and developer interest.

Evaluation of Sites to Accommodate Varied Income Levels

One of the most important evaluation considerations of the site selection process is to look at a sites' ability to accommodate households with varying income levels. To satisfy the RHNA requirement, sites have been identified and analyzed in this section and listed in the Appendix D spreadsheet. In addition to the information and the expected number of units summarized for each site, the assumed affordability levels of units are also considered. Furthermore, the unit capacity must be maintained throughout the 2023-2031 planning period, so the County has identified sites well in excess of its RHNA. If sites listed in the inventory are redeveloped with other uses or different income levels than what is identified, the difference can be made up with the buffer sites to ensure there is "no net loss" of RHNA capacity at each income level.

Affordability Assumptions

This Housing Element relies on State law and HCD guidance to establish the affordability levels of new housing in the County. Affordability assumptions for single family residences (including ADUs) are discussed in Section 2.1.1 and are shown along with identified sites in Table 50.

Table 50: Affordability Assumptions

Site Characteristic	Capacity Assumption	Income Category Application
Less than 0.5 acres	N/A	N/A
0.5 to 10 acres (and rezoned to allow at least 20 du/ac)	100%	Very-Low and Low-Income Units
Single-family residential parcels that are vacant (no building on site) and that are deemed buildable based on road access and slope.	100%	Above Moderate-Income Units
Residential parcels that can accommodate Accessory Dwelling Units	22%	Very-Low and Low-Income Units
	33%	Moderate-Income Units
	44%	Above Moderate-Income Units

State law (Government Code Section 65583.2(c)(3)) establishes a “default density standard” of 20 units per acre for lower-income units in a suburban jurisdiction such as Napa County. This is the density that is “deemed appropriate” in State law to accommodate the County’s lower-income RHNA. Sites identified that are 0.5 acres and larger with zoning or General Plan land use designations that allow for development at 20 units per acre are therefore included in the inventory as lower-income sites.

Accommodating Very-Low and Low-Income Households

As noted above, land zoned at 20 dwelling units per acre (or greater) is assumed to be available to accommodate very-low and low-income housing development. All sites in the inventory are expected to have 20 acres of land zoned for residential development at a minimum of 20 dwelling units per acre. Specifically, including the State controlled Imola site, the available land inventory summary offers additional sites in Spanish Flat, Foster Road, and Northeast of Napa for the production of very low- and low-income housing. These sites are capable of producing 483 units, which exceeds the remaining outstanding RHNA for very low- and low-income households of 61 units by a surplus of 422 sites.

Accommodating Moderate-Income Households

Second dwelling units are frequently affordable to moderate and above moderate-income households. County records indicate that 34 second units have been produced in the unincorporated area from 2017 through 2020. Assuming that this trend continues, the County expects to issue an average of 12 permits per year, for an additional 72 second units before the end of the planning period. While most of these units would accommodate moderate and above moderate-income households, some would accommodate lower income households. A

conservative approach has been taken to determine the unit distribution among income levels based on County survey results on ADU production, with roughly 20 percent attributed to lower income units and 80 percent to moderate and above moderate-income units. With these units, Napa County has more than adequate capacity (24 units) to accommodate its RHNA (14 units) for moderate-income housing units.

Accommodating Above Moderate-Income Households

In reviewing existing parcels with potential for development of single-family homes, the County's General Plan and zoning ordinance permit construction of one single family home on each legal lot, except for areas that are zoned for industrial use. The parcels available to accommodate construction of a single-family dwelling number are in the thousands. By reviewing those residentially allowable parcels that are considered vacant (no building on site) and that are deemed buildable based on road access and slope, up to 230 single family homes could be developed on currently vacant parcels, with the assumption that these homes would provide market rate (rather than affordable) housing. Thus, Napa County would accommodate more than its RHNA of 31 units for above moderate-income households.

Farmworker Housing

The County's zoning ordinance permits development of up to 12 individual farmworker housing units as an allowed use by right on every legal parcel in agricultural zones. The County is seeking to encourage additional development of farmworker units and is participating in ABAG's Farmworker Collaborative to support its objectives for farmworker housing production. Section 3. of this Housing Element Update includes goals, policies, and programs that address farmworker housing needs, with specific objectives identified.

Non-vacant Sites Analysis

For nonvacant sites, HCD requires that jurisdictions demonstrate the potential and likelihood of additional development within the planning period. HCD requires that substantial evidence be provided if more than 50 percent of the lower income sites in the inventory are on non-vacant sites. To determine if this is the case, the sum of lower income units on identified opportunity sites were tallied, a methodology consistent with HCD guidance. Based on Napa County's sites inventory, all of the County's lower income RHNA would be assumed as being provided on existing non-vacant parcels. However, with rezoning to occur for the sites on vacant portions of the identified parcels, only three of the six sites identified, or roughly 38 percent of the unit capacity assumed for the County's lower income sites inventory would be on non-vacant sites, which is below the 50 percent threshold and therefore substantial evidence may not be required. While substantial evidence may not be required, the County has identified those sites where development is likely to occur for the following reasons:

- Sites identified are considered underutilized or substantially vacant on the portions of the parcels identified for rezoning.
- Existing uses of sites are considered not economically viable for further development and the County has reached out to property owners for residential development interest.

In the case of the Imola Avenue site, the site has been identified as State surplus property.

- The County has reached out to property owners, and those property owners have expressed interest in residential development, having their parcel being rezoned, and included within the sites inventory.
- County funding would be available to support necessary infrastructure improvements and affordable housing.

Further details and evidence of development interest by site has been described within the Summaries of Development Sites.

Sites Inventory

This section provides a listing of all sites identified in the Napa County 6th Cycle Housing Element Sites Inventory for the 2023-2031 planning period and the relevant information for the site. Figure 1 includes an overview map of the identified housing site locations within Napa County, and Section 3.1 provides a synopsis of the realistic unit capacities for each site summarized by geographic groupings for the identified development sites to be included in the inventory. For reference, Appendix D includes the more detailed sites inventory table for submittal to HCD.

Summaries of Development Sites

Following are descriptions and justifications of the housing inventory sites, including their realistic unit yields. The sites are organized into five geographic areas: Spanish Flat, Northeast Napa, Imola Avenue, and Foster Road.

Figure 93: Overview of Housing Site Locations

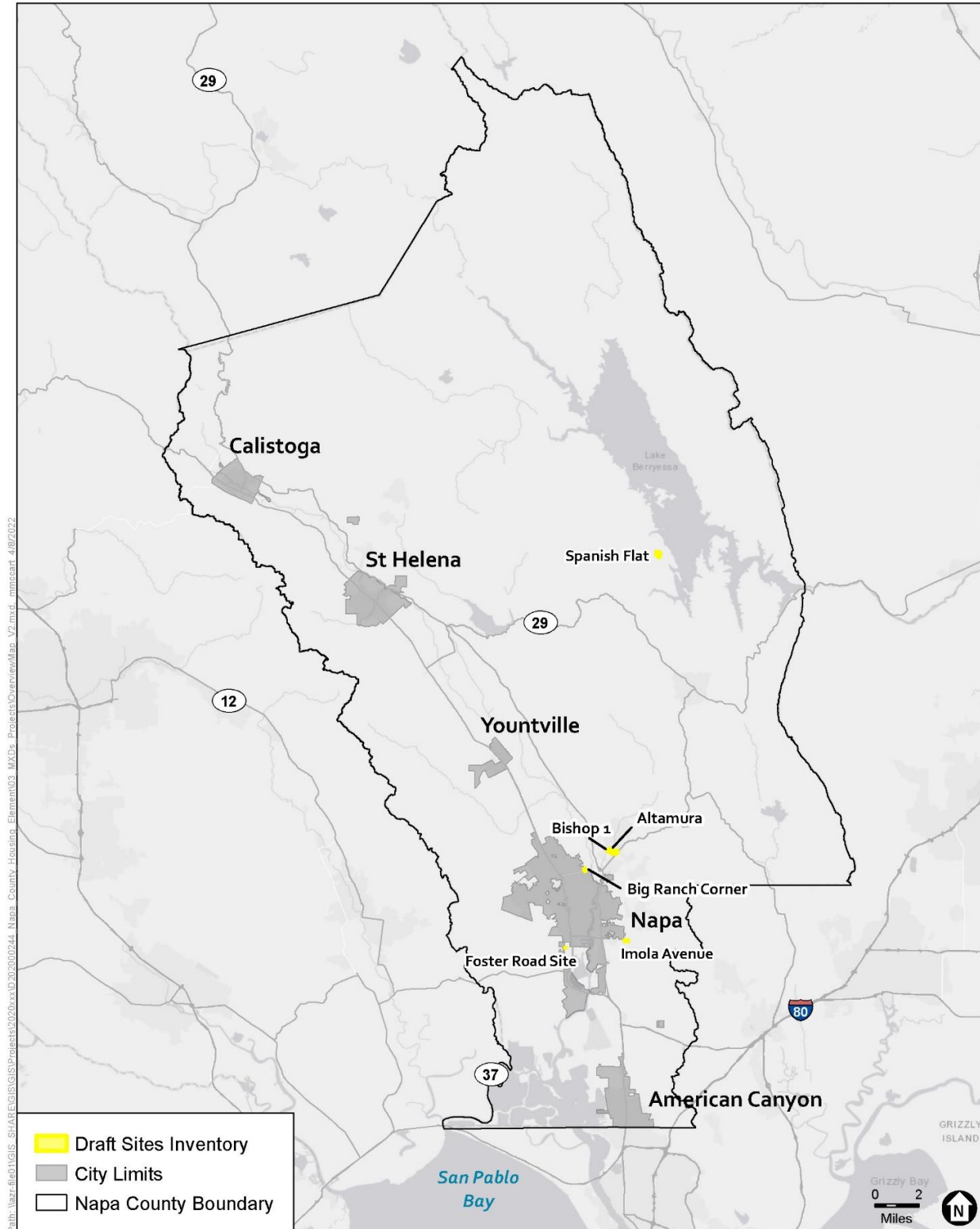


Figure 94: Napa County Fire Hazard Severity Zones Proximity to Sites

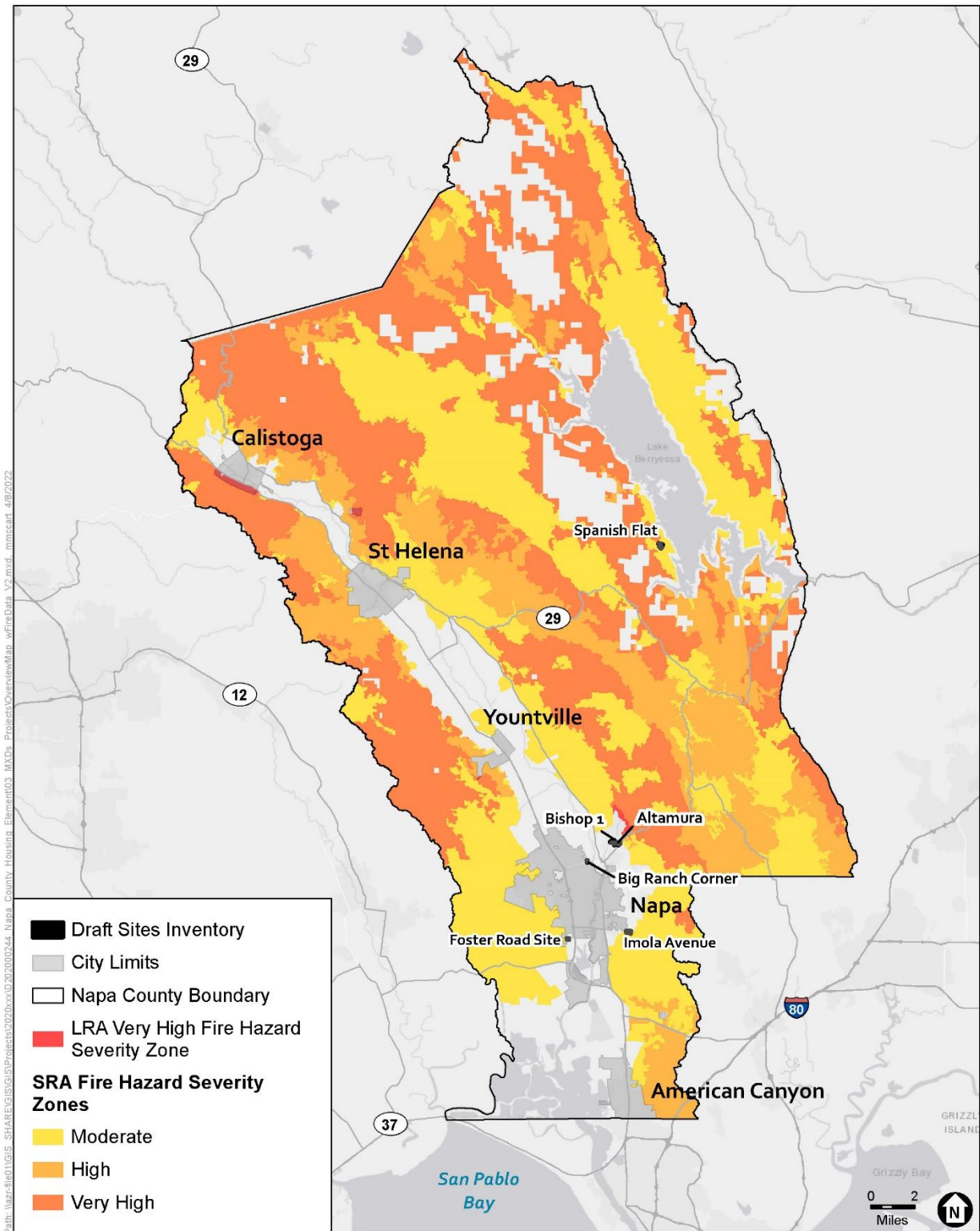
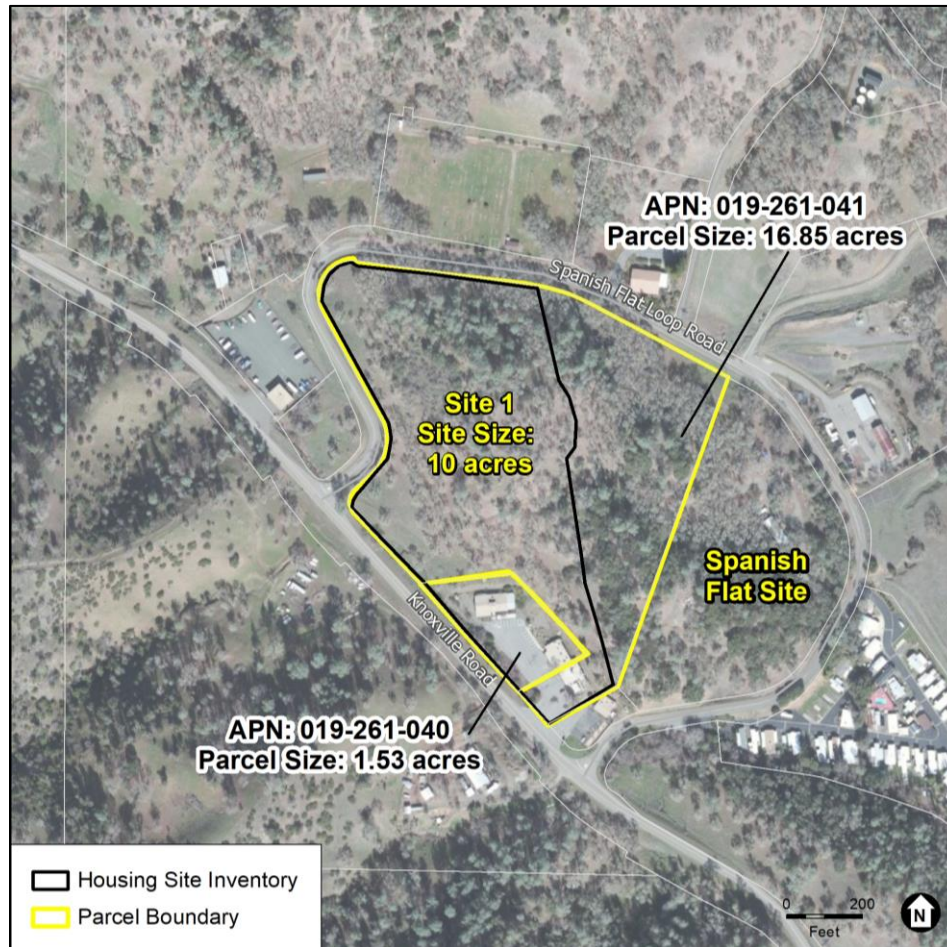


Figure 95: Spanish Flat Site –Parcel Summary



Evaluation of Site Location and Data

The County is working with a private developer and the Bureau of Reclamation to reestablish resorts at Lake Berryessa that were closed in 2009. This undertaking is expected to stimulate economic activity and employment in an area that was badly affected by the LNU Lightning Complex Fire in 2020 and will create a need for housing in the small community of Spanish Flat, which is served (water and wastewater) by the Spanish Flat Water District. A 10-acre portion of two separate parcels (one 16.85-acre parcel and another 1.53 acre parcel) in Spanish Flat would be rezoned to the County’s Affordable Housing District (AHCD), and Chapter 18.82 of the County’s Municipal Code regarding this zoning district would be amended to provide site-specific provisions, including a minimum density of 20 dwelling units per acre unless constrained by site characteristics, a maximum density of 25 dwelling units per acre, and applicable development standards. Both parcels are designated as Rural Residential in the General Plan and currently zoned Commercial Neighborhood (CN).

Site 1 – Portion of APN 019-261-041 and APN 019-261-040 Vacant <input type="checkbox"/> or Non-Vacant <input checked="" type="checkbox"/>	Existing	Update
Parcel Size (Acres)	18.38 acres	18.38 acres
Site to be Rezoned	N/A	10 acres
Zoning	CN	CN:AHCD
Allowable Density (Units/Acre)	0 ^a	20 min. / 25 max.
Realistic Unit Capacity (With Rezoning)	100	

Description of Sites and Factors Supporting Development: Parcels 019-261-041 and 019-261-040 are privately owned and include sloping terrain such that developable areas are confined to the perimeter of the parcels where slopes are less than 20 percent. The property owner/developer has expressed interest in developing housing on this site, and has provided a site plan showing approximately 100 smaller units along the site perimeter, and 100 units are therefore assumed to represent the realistic unit capacity based on site constraints even with rezoning to allow 20 to 25 units to the acre. Rezoning the site as a 10-acre portion of the parcels to include the AHCD and amending Chapter 18.82 of the Municipal Code to provide minimum densities of 20 dwelling units per acre, maximum densities of 25 dwelling units per acre, and applicable development standards would allow the property owner to realize their vision. While the zoning would theoretically provide for at least 200 units on a 10-acre site, the sloping terrain would constrain development and the realistic unit capacity is therefore 100 units, with the developable area at a density of at least 20 units/acre. The development would obtain water and wastewater services from the Spanish Flat Water District.

^a Not accounting for ADUs/JADUs

Northeast of Napa (Sites 2, 3, 4)

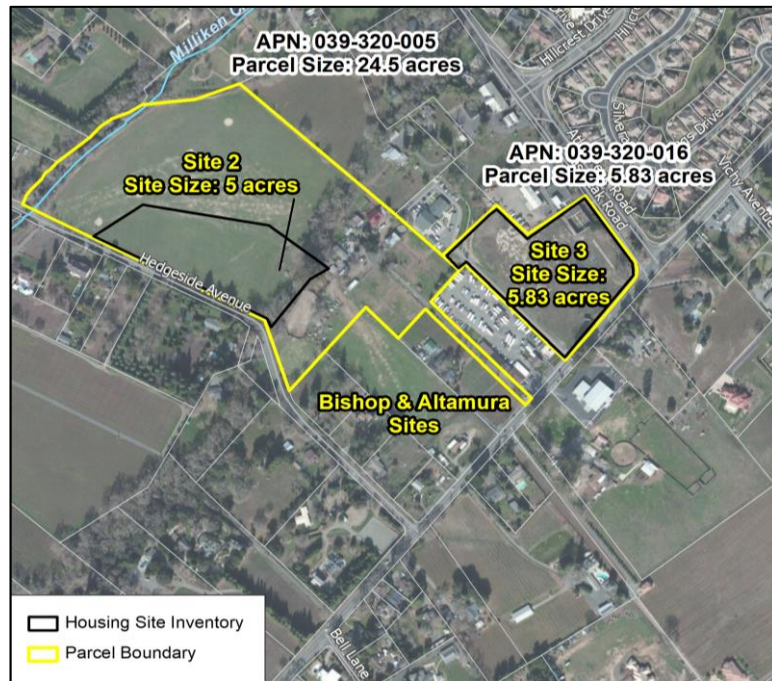


Figure 96: Bishop and Altamura Sites – Summary of Parcels

Evaluation of Sites Location and Data:

Three sites have been identified in the unincorporated area northeast of the City of Napa; two are between the city limits and the Silverado Country Club along Monticello Road, and one is at the intersection of Trancas and Big Ranch Road. These sites are outside the City of Napa’s Rural Urban Limit, and within the City of Napa’s Water Service area, where City water may be provided upon approval of the City Council. These sites are also adjacent to wastewater infrastructure owned by the Napa Sanitation District, and service may be provided upon approval of the Local Agency Formation Commission (LAFCO) and the District. Connecting to the wastewater system would require rehabilitating a section of the sewer main and undertaking improvements to decrease peak wet weather flows (i.e., stormwater infiltration). Two of the sites are designated as Rural Residential in the General Plan, with the third identified as Agricultural Resource (although it was designated Rural Residential as of September 28, 2007, the date specified in Measure P,



Figure 97: Big Ranch Corner Site - Parcel Summary

approved by the voters in November 2008). Two of the parcels are within the Residential Country zoning district and the third parcel is within the Planned Development zone and was included in a prior housing element (3rd cycle). All or a portion of each parcel would be rezoned to the Residential Multiple (RM) zoning district, and Chapter 18.60 of the Municipal Code would be amended to provide minimum densities of 20 dwelling units per acre unless constrained by site characteristics, maximum densities of 25 dwelling units per acre, and applicable development standards.

Site 2 – Bishop 1 - APN 039-320-005 Vacant <input type="checkbox"/> or Non-Vacant <input checked="" type="checkbox"/>	Existing	Update
Parcel Size (Acres)	24.5	24.5
Site to be Rezoned (Acres)	N/A	5.0
Zoning	RC	RM
Allowable Density (Units/Acre)¹	1 ^a	20 min / 25 max
Realistic Unit Capacity (With Rezoning)	100	

Description of Sites and Factors Supporting Development: The site is privately owned, and the portion of the parcel proposed for rezoning is currently vacant. The housing development would obtain City of Napa and Napa Sanitation District water and wastewater services. Rezoning a five-acre portion of the parcel with access from Hedgeside Avenue to RM would provide for development at a minimum of 20 du/ac.

^a Not accounting for ADUs/JADUs

Site 3 – Altamura - APN 039-320-016 Vacant <input type="checkbox"/> or Non-Vacant <input checked="" type="checkbox"/>	Existing	Update
Parcel Size Acres	5.8	5.8
Site to be Rezoned (Acres)		5.8
Zoning	PD	RM
Allowable Density (Units/Acre)	1 ^a	20 min / 25 max
Realistic Unit Capacity (With Rezoning)	58	

Description of Sites and Factors Supporting Development: The site is privately owned and is located at the intersection of Monticello Road and Atlas Peak. It currently contains the shell of a large structure that is no longer occupied, and the property owner has long been interested in developing housing on the site. The housing development would obtain City of Napa and Napa Sanitation District water and wastewater services. Rezoning the site to RM would provide for development at a minimum of 20 du/ac unless constrained by site characteristics, however based on past proposals for the site and the expectation that only a portion of the site would be developed, the anticipated development would provide 58 units.

^a Not accounting for ADUs/JADUs

Site 4 – Big Ranch Corner – APN 038-190-007 Vacant <input type="checkbox"/> or Non-Vacant <input checked="" type="checkbox"/>	Existing	Update
Parcel Size (Acres)	3.0	3.0
Site to be Rezoned		1.5
Zoning	AP	RM
Allowable Density (Units/Acre)	1 ^a	20 min / 25 max
Realistic Unit Capacity (With Rezoning)	25	

Description of Sites and Factors Supporting Development: The parcel is privately owned and is located at the intersection of Trancas and Big Ranch Road. The owner expressed interest in developing housing in the past and rezoning a 1.5-acre portion of the parcel fronting on Big Ranch Road to RM would allow for housing development at a minimum of 20 dwelling units per acre on that site unless constrained by site characteristics. Based on the expectation that an existing single-family home on the property may be retained, the anticipated development would provide 25 units. The housing development would obtain City of Napa and Napa Sanitation District water and wastewater services.

^a Not accounting for ADUs/JADUs

Imola Avenue (Site 5)

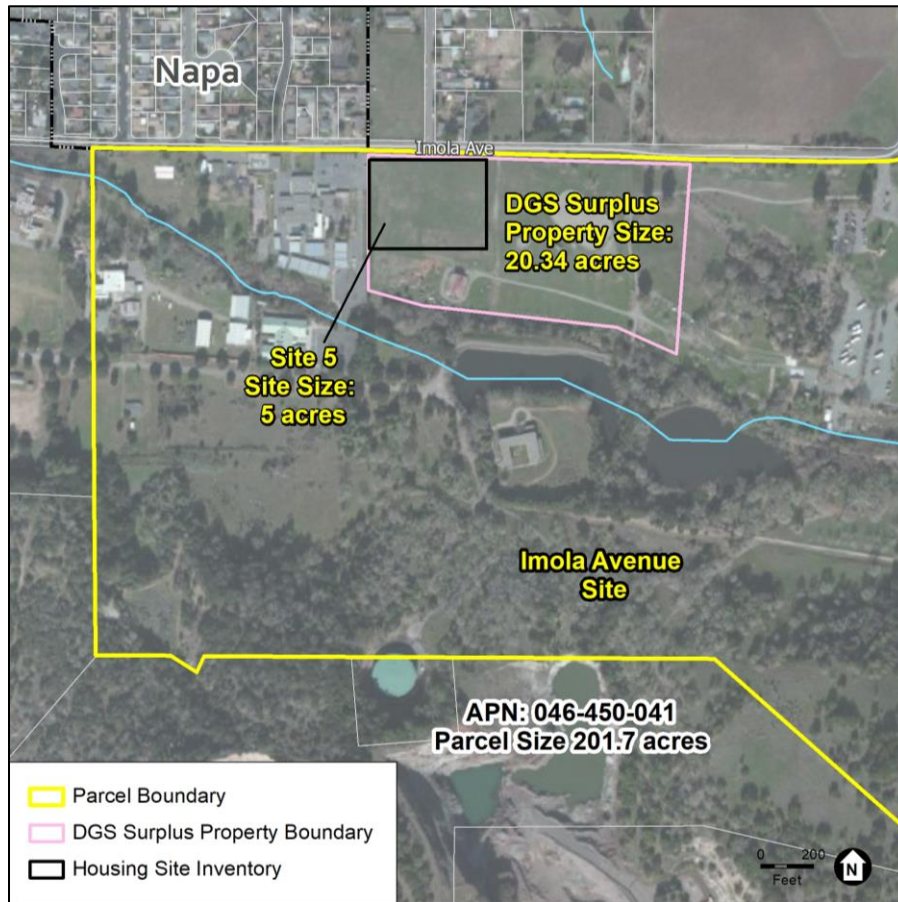


Figure 98: Imola Ave Site – Parcel Summary

Evaluation of Sites Location and Data:

The State of California has identified a 20.34-acre piece of surplus property in the unincorporated area south and east of the City of Napa adjacent to the Napa State Hospital on a 201.7-acre parcel that makes up a portion of Skyline Park. The 20.34-acre surplus property is included on the Department of General Services, Real Estate Services Division’s map of surplus property identified pursuant to Executive Order N-06-10, Affordable Housing Development, and Department staff has indicated that a 5-acre portion is likely to be developed for affordable housing within the eight-year planning period. The site is outside the City of Napa’s Rural Urban Limit and adjacent to the County Office of Education, Creekside Middle School, and the Napa State Hospital. While water and wastewater infrastructure is located nearby, obtaining water from the City of Napa and wastewater services from the Napa Sanitation District would require approvals from the City, LAFCO, and the District. Also, while the site is designated as Agriculture, Watershed, and Open Space in the General Plan and the parcel is currently zoned as Agricultural Watershed with a Skyline Wilderness Park (:SWP) combining district designation, the State is not subject to the County’s General Plan and zoning.

Site 5 – APN 046-450-041 Vacant <input type="checkbox"/> or Non-Vacant <input checked="" type="checkbox"/>	Existing	Update
Parcel Size (Acres)	201.7	201.7
State Surplus Property Identified by DGS (Acres)	20.34	20.34
Site Identified for Housing per DGS Staff (Acres)	5.0	5.0
Zoning	AW:SWP	N/A
Allowable Density (Units/Acre)	1 ^a	N/A
Realistic Unit Capacity	100	

Description of Sites and Factors Supporting Development: The 20.34-acre site is owned by the State of California and has been identified as surplus property appropriate for the development of housing pursuant to Executive Order N-06-19. Based on conversations with DGS staff, the County understands that five acres of the property will be made available for development of affordable housing within the eight-year planning period. DGS staff was not able to specify the number of units that would be provided, and the County therefore used the “default density” of 20 du/ac specified in Government Code Section 65583.2(c) to determine that the realistic unit capacity would be 100 units. Development of housing on the site would not be subject to the County’s zoning or General Plan and would connect to nearby infrastructure owned by the City of Napa and the Napa Sanitation District. The site is located within land currently included in Skyline Park (which is owned by the State) and is therefore not considered vacant.

^a Not accounting for ADUs/JADUs

Foster Road - (Sites 6)



Figure 99: Foster Road Site – Parcel Summary

Evaluation of Sites Location and Data:

Five acres of a 24-acre parcel within unincorporated Napa County along Foster Road south of Imola Avenue would be rezoned to RM, allowing development of housing at a minimum density of 20 du/ac and a maximum density of 25 du/ac. The site is within the City’s Rural Urban Limit (RUL) and the County’s General Plan indicates that parcels within the City’s Rural Urban Limit (RUL) line will not develop without annexing to the City of Napa. Thus, the five-acre site (or the entire 24-acre parcel) would annex to the City prior to occupancy. With annexation, the site would have access to City water, and could connect to nearby infrastructure. Development on the site could also connect to nearby infrastructure for wastewater collection owned by the Napa Sanitation District, subject to approval of LAFCO and the District. The site is designated as Rural Residential in the General Plan and is currently zoned Agricultural Watershed. The parcel is also identified within the Urban Reserve combing district which stipulates that uses or actions other than permitted uses first require an

application for annexation to be processed before proceeding. Planning for housing at the site would involve collaboration between the property owner, the City and the County, and could serve as a “pilot” project, testing development standards that could apply to the broader Foster Road area. Currently, the City of Napa’s proposed General Plan Update proposes that this area would be designated for a mix of uses with residential densities allowed at densities up to 10 units per acre. The County’s proposal for higher residential densities conforms with the “default density” provided in Government Code Section 65583.2(c) and is intended to ensure that the site could accommodate lower income households.

Site 6 – APN 043-062-008	Vacant <input type="checkbox"/> or Non-Vacant <input type="checkbox"/>	Existing	Update
Parcel Size (Acres)		24.0	24.0
Site to be Rezoned (Acres)		N/A	5
Zoning		AW:UR	RM
Allowable Density (Units/Acre)		1 ^a	20 min / 25 max
Realistic Unit Capacity (With Rezoning)		100	

Notes: The site is within the City of Napa RUL, which is an area of the unincorporated County long identified for annexation and development within the City of Napa. The City of Napa’s ongoing General Plan Update anticipates this happening over time and proposes policies to govern planning, development, and future annexation. By identifying a relatively small site within this larger area for rezoning, the County would provide the property owner with the opportunity to advance plans for housing on a portion of their parcel, construct housing, and pursue annexation in the near term. The property owner has expressed an interest in development in the past. The five-acre site would be rezoned to the Residential Multiple (RM) zoning district, and Chapter 18.60 of the Municipal Code would be amended to provide minimum densities of 20 dwelling units per acre, maximum densities of 25 dwelling units per acre, and applicable development standards. The development would connect to nearby infrastructure owned by the City of Napa (potable water) and the Napa Sanitation District (wastewater) and would annex to the City prior to occupancy.

^a Not accounting for ADUs/JADUs

Table 51: Housing Element Sites Inventory - List of Sites

Site ID	Site Name	Site Address/Intersection	Assessor Parcel Number	General Plan Designation (Current)	Zoning Designation (Current)	Zoning Designation (Proposed)	Parcel Size (Acres)	Assumed Site Size (Acres)	Lower Income Capacity	Moderate Income Capacity	Above Moderate-Income Capacity	Realistic Capacity Total (Units)
1	Spanish Flat	4322 Berryessa Knoxville Rd	019-261-041 019-261-040	Rural Residential	CN	AHCD	18.38	10.00	100	0	0	100
2	Bishop 1	1806 Monticello Rd	039-320-005	Rural Residential	RC	RM	24.5	5.00	100	0	0	100
3	Altamura	1011 Atlas Peak Rd	039-320-016	Rural Residential	PD	RM	5.83	5.83	58	0	0	58
4	Big Ranch Corner	2030 Big Ranch Rd.	038-190-007	Agricultural Resource	RC	RM	3.00	1.50	25	0	0	25
5	Imola Ave	2121 Imola Ave	046-450-041	Agriculture, Watershed, and Open Space	AW:SWP	N/A	201.7	5.00	100	0	0	100
6	Foster Road	1298 Foster Road	043-620-008	Rural Residential	AW:UR	RM	24.00	5.00	100	0	0	100
ALL SITES							277.41	77.33	483	0	0	483

Evaluation of Sites Inventory Through the Lens of AFFH

AB 686 (Santiago) created a new requirement for local jurisdictions to evaluate their Housing Element sites inventories through the lens of affirmatively furthering fair housing (AFFH). The law requires that the site inventory be used to identify sites throughout the community, consistent with the local jurisdiction's duty to affirmatively further fair housing. HCD's guidance on implementation of the requirement for the sites inventory analysis states that it should address:

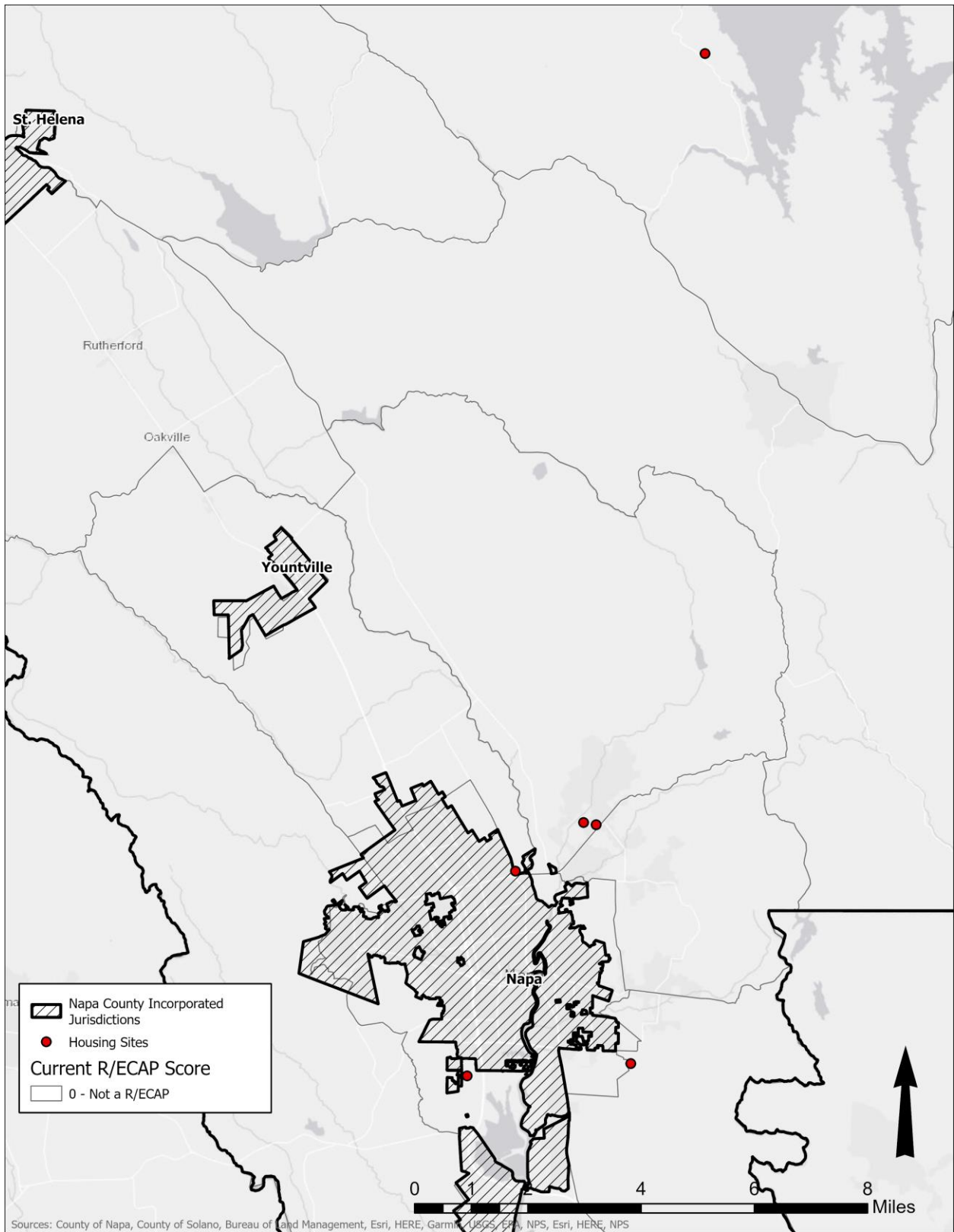
- **Improved Conditions:** A discussion of how the sites are identified in a manner that better integrates the community with a consideration for the historical patterns and trends, number of existing households, the magnitude (e.g., number of units) of the RHNA by income group and impacts on patterns of socio-economic and racial concentrations.
- **Exacerbated Conditions:** Similar to above, an explanation of identified sites relative to the impact on existing patterns of segregation and number of households relative to the magnitude (e.g., number of units) of the RHNA by income group.
- **Isolation of the RHNA:** An evaluation of whether the RHNA by income group is concentrated in areas of the community.
- **Local Data and Knowledge:** A consideration of current, planned and past developments, investment, policies, practices, demographic trends, public comment and other factors.
- **Other Relevant Factors:** Any other factors that influence the impacts of the identification of sites to accommodate the regional housing need on socio-economic patterns and segregation.

The following discussion explores how the housing sites inventory for the 2023 to 2031 Housing Element addresses these concerns.

Racially and Ethnically Concentrated Areas of Poverty (R/ECAPs)

Unincorporated Napa County does not have any areas that qualify as R/ECAPS (nor does it have any areas that qualify as Racially Concentrated Areas of Affluence (RCAAs). Further, the sites inventory spreads the sites targeted for lower-income housing across five different areas of the County, ensuring that the County would not overly concentrate new lower-income housing in any single area. Thus, there is no concern about the distribution of lower-income RHNA sites potentially exacerbating existing R/ECAPS or failing to better integrate existing RCAAs. See Figure 100, below.

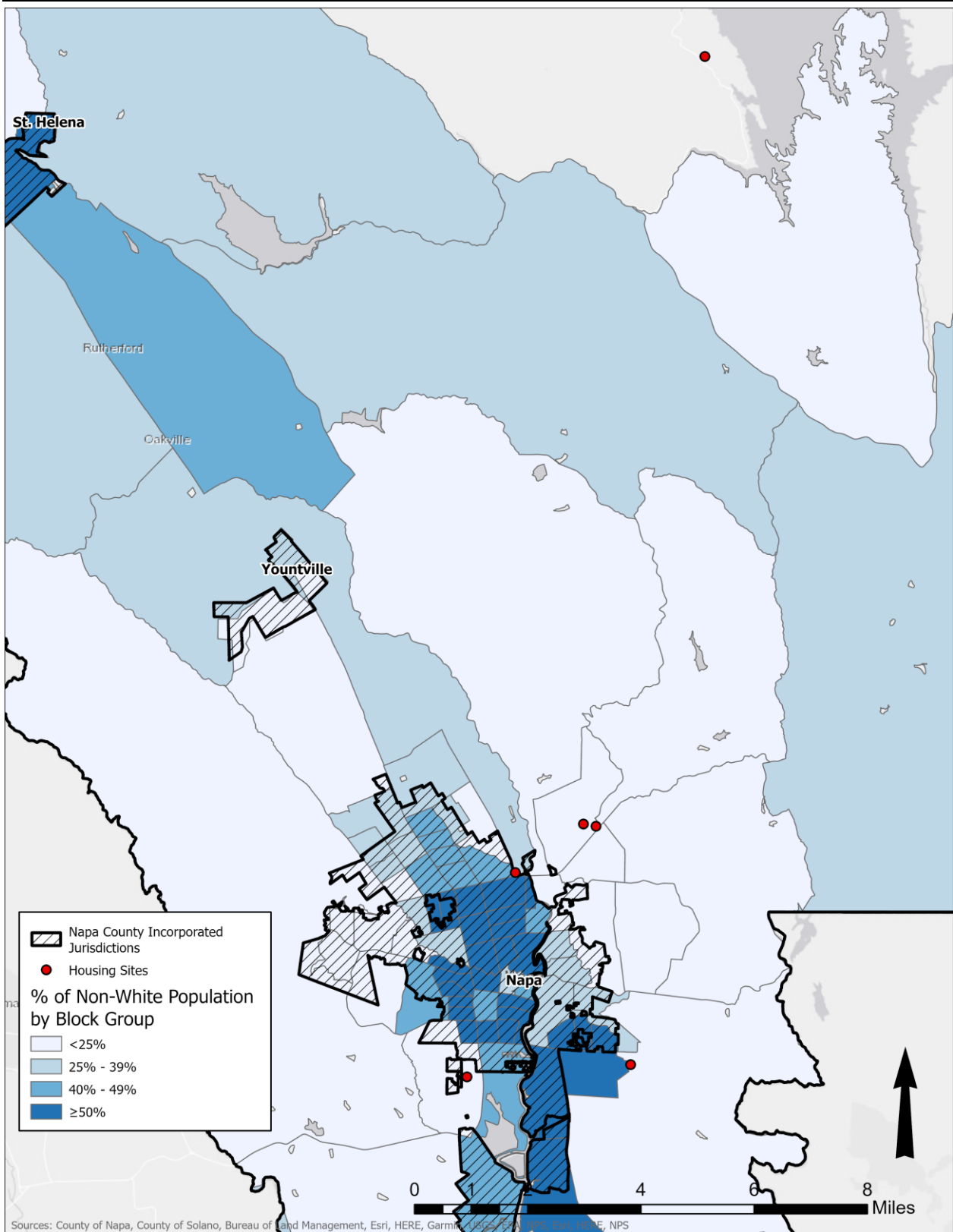
Figure 100: Housing Sites Relative to R/ECAPS



Areas with Concentrations of Minority Residents (% of Population Non-White)

Unincorporated Napa County is nearly 70 percent White non-Hispanic. To the extent that minorities are disproportionately represented in lower-income households, developing new housing for lower-income households would help to better integrate the unincorporated areas. The distribution of lower-income housing sites across five locations will help to ensure that no new concentrations of minority residents will be created. See Figure 101, below.

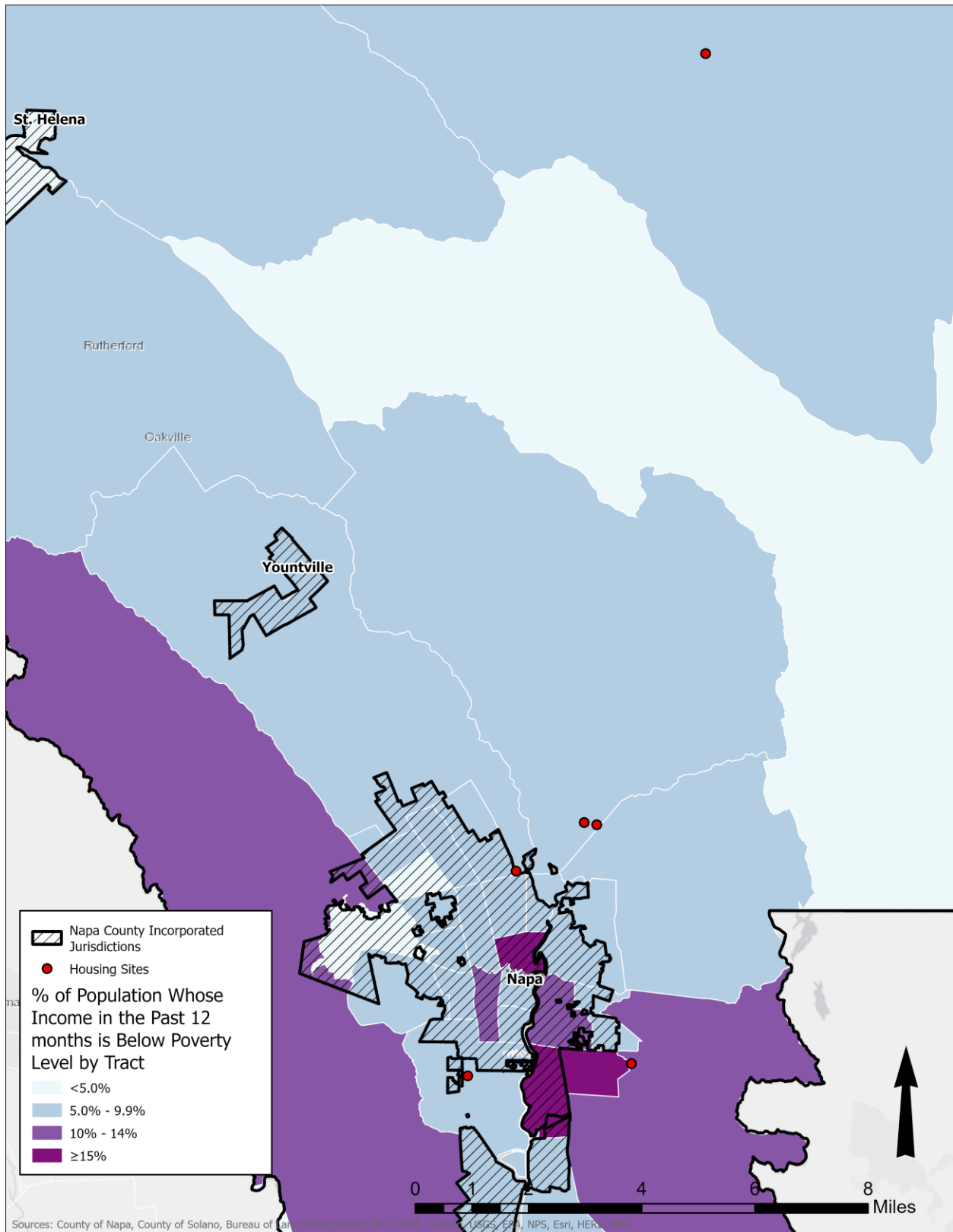
Figure 101: Housing Sites in Relation to Existing Non-White Population



Concentrations of Poverty (% of Population with Income below poverty level)

No Census Tract in unincorporated Napa County has more than 11.3 percent of households with incomes below poverty level; thus, by spreading sites identified to accommodate the County's lower-income RHNA across multiple areas, Napa County will ensure that the Housing Element will not create any concentrations of poverty. See Figure 102, below.

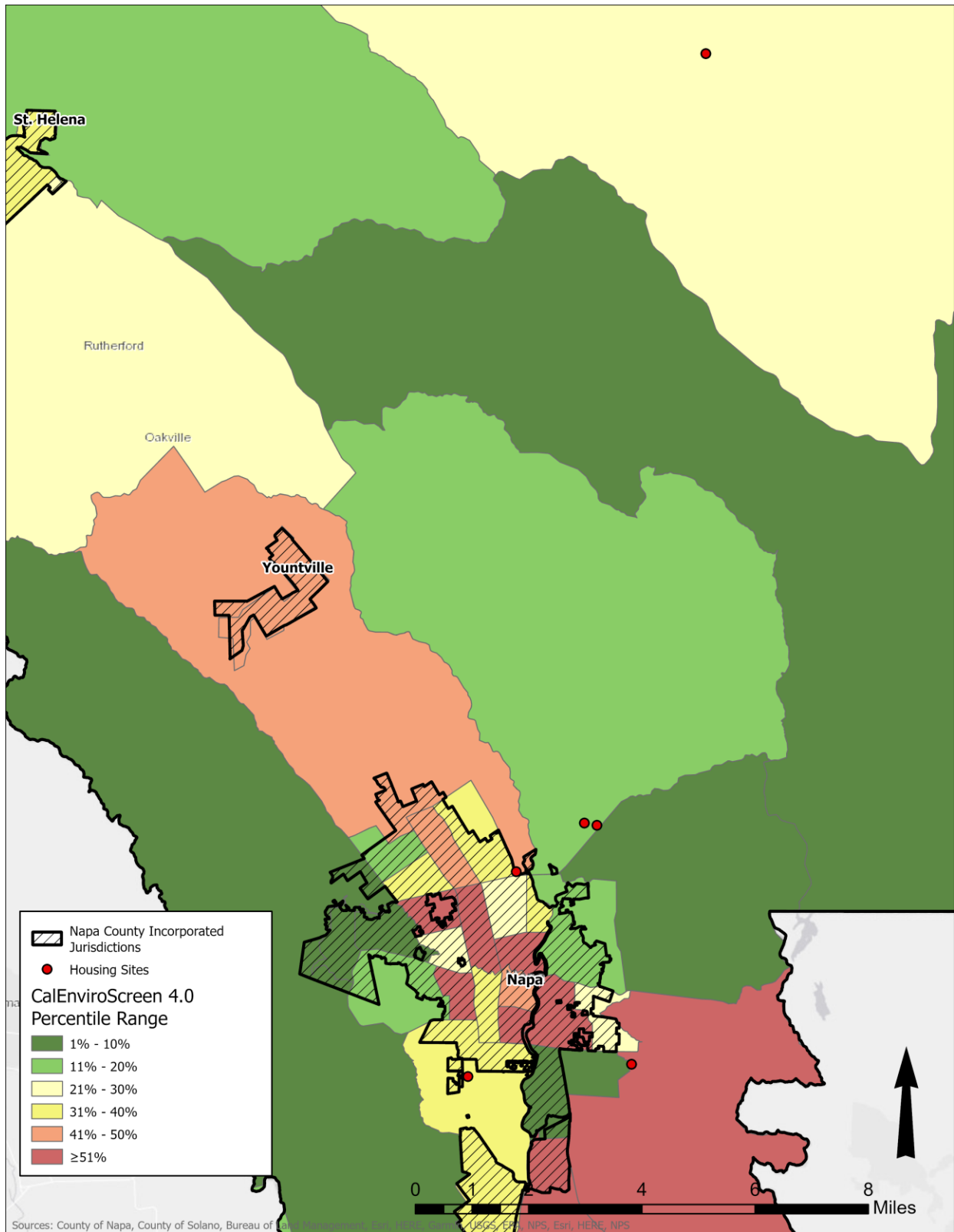
Figure 102: Housing Sites in Relation to Concentrations of Poverty



Environmental Conditions (CalEnviroscreen)

As shown in Figure 103, the lower-income sites are distributed across Census Tracts which have a range of overall CalEnviroscreen scores, ranging from very good (11th percentile) to good (36th percentile) with the Census Tract for the Imola Avenue site having no overall ranking due to a small existing population and limited data. This information indicates that the housing sites inventory targets locations where lower-income residents would generally have access to a healthy living environment.

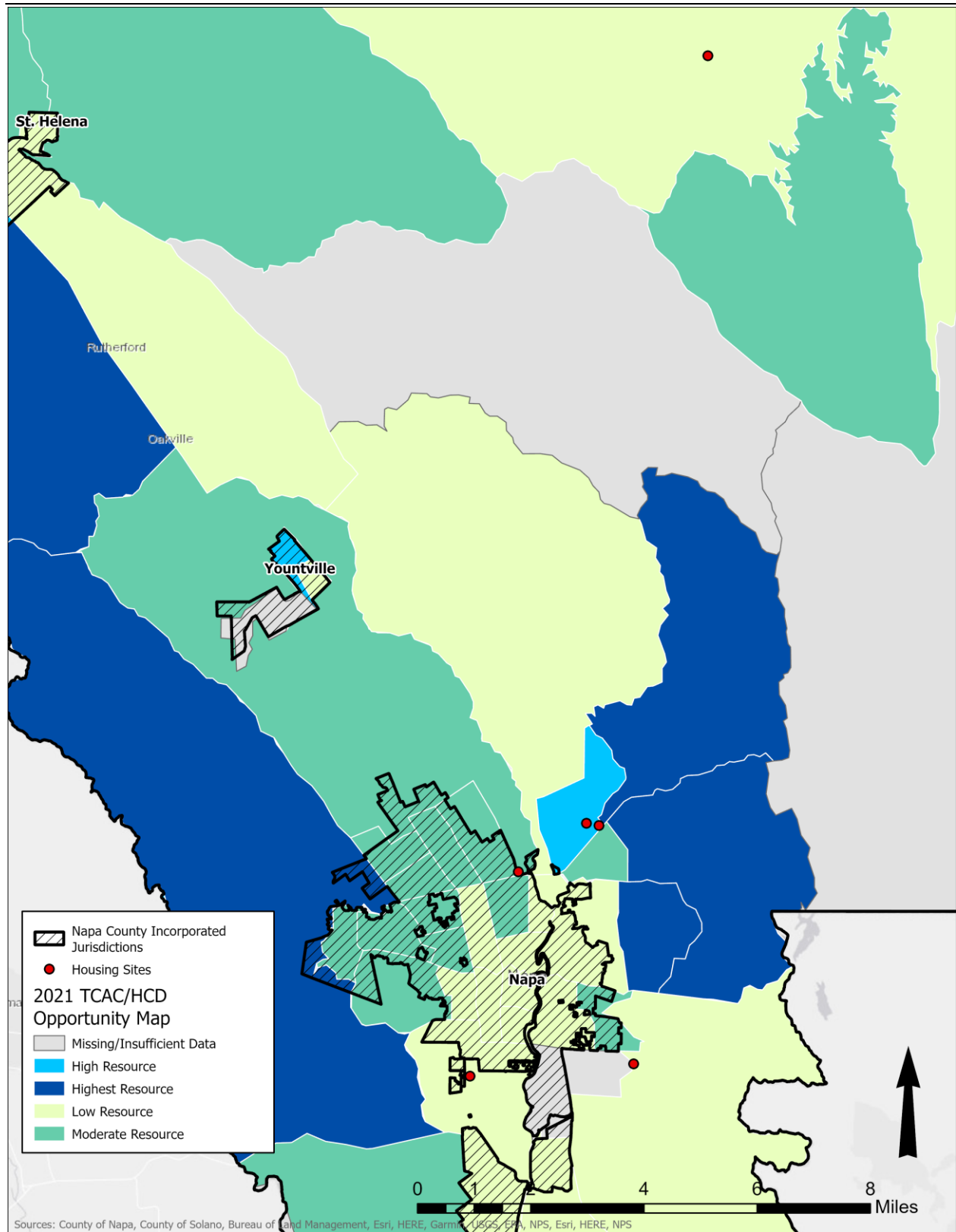
Figure 103: Housing Sites in Relation to Environmental Conditions



Access to Opportunity (TCAC/HCD Opportunity Areas)

With locations that span from urban to rural, Napa County's sites inventory for lower-income households targets housing locations that also span the range of opportunity areas, as rated by TCAC/HCD's opportunity area maps. See Figure 104. The Spanish Flat site is in a low resource area, due to its rural nature. By virtue of being near the City of Napa, the Northeast Napa sites are in moderate to high resource areas. The Imola Avenue site is in an area with insufficient data to provide an opportunity rating, while the Foster Road site is identified as a low resource area.

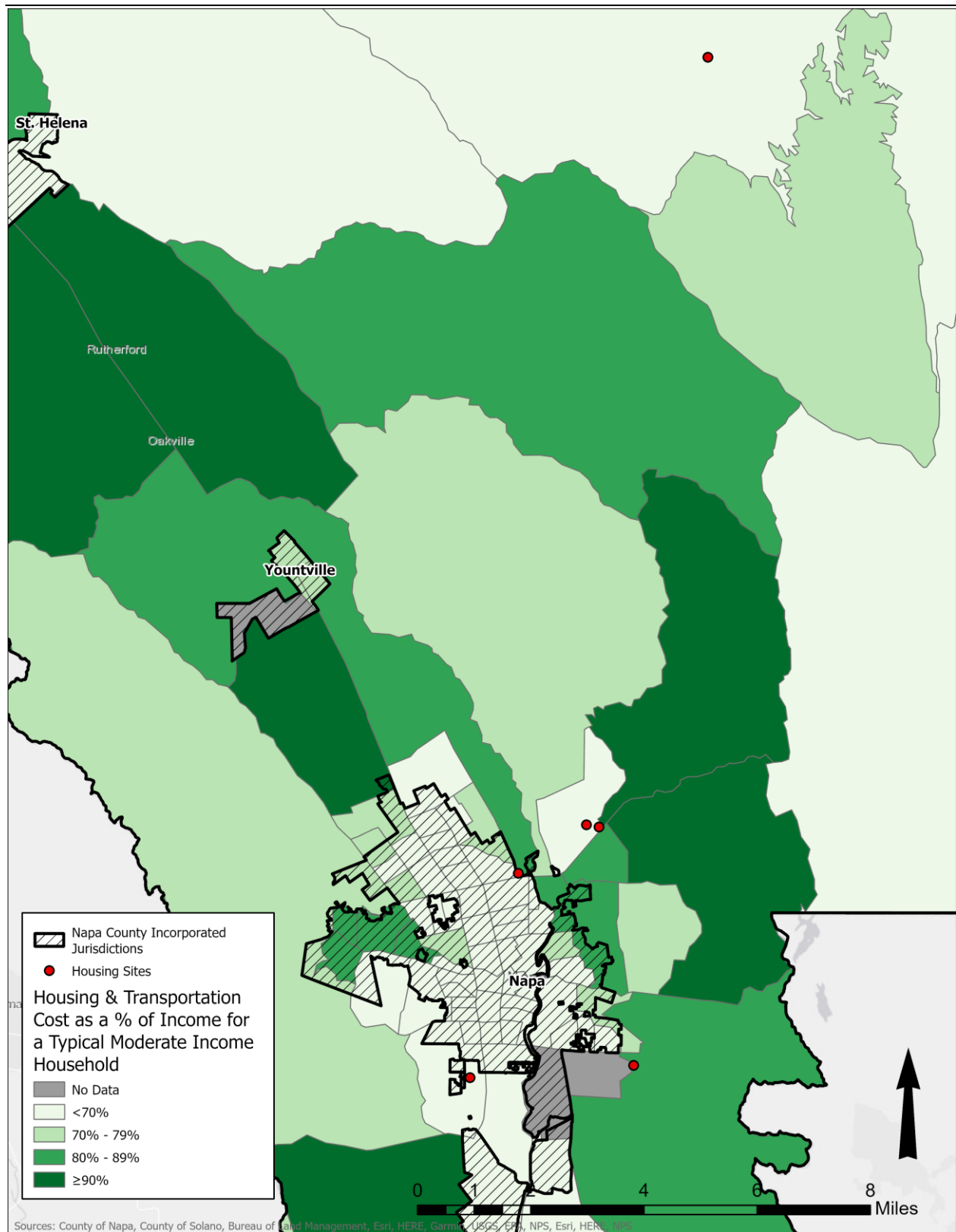
Figure 104: Housing Sites in Relation to Areas of Opportunity



Transportation Access (Housing + Transportation Cost as % of Income)

Due to Napa County's relatively high housing costs, combined with relatively limited transit access, most areas of Napa County score relatively poorly on the Housing + Transportation (H+T) cost index, requiring relatively high percentages of income to cover these key household costs, as shown in Figure 105. The Spanish Flat site is located in one of the most affordable areas within the County by this metric, as are the Bishop and Altamura and Big Ranch Corner sites in Northeast Napa, and the Foster Road site. There is insufficient data for the Imola Avenue site to have a H+T index score. Generally, the sites located on the periphery of the City of Napa will offer residents the best alternative transportation options, because Napa County's Vine transit service is most concentrated in this area and the more urbanized nature of the City of Napa means that concentrations of jobs and services are in closer proximity, making walking and bicycling more viable means of transportation for those who do not have access to private vehicles.

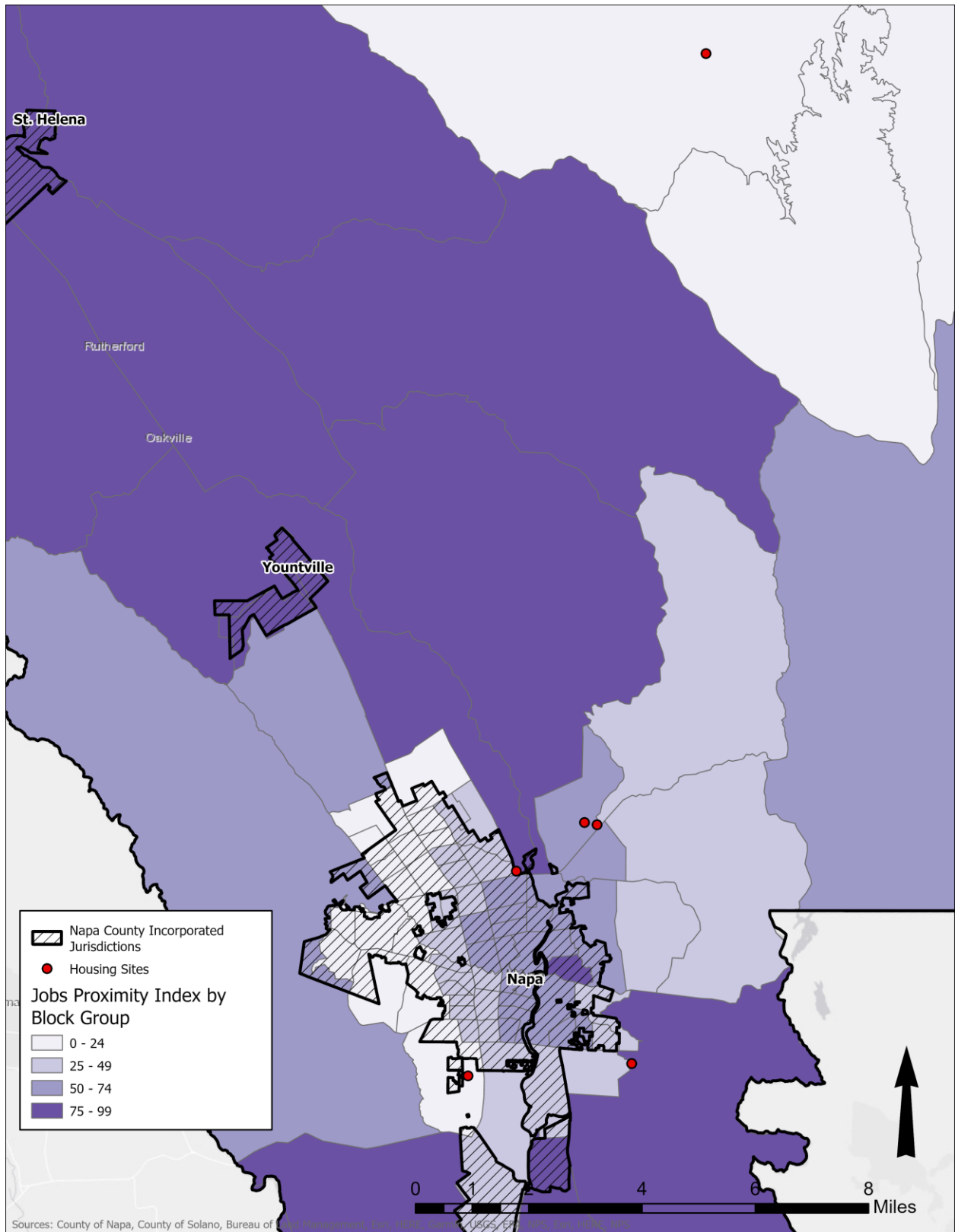
Figure 105: Housing Sites in Relation to Housing + Transportation Cost



Access to Jobs (Jobs Proximity Index)

As shown in Figure 106, Napa County's lower-income housing sites are distributed across areas that have a range of jobs access quality. As the most rural location, the Spanish Flat site has the poorest job access, according to the jobs proximity index; however, the intent of the Spanish Flat site is to provide housing options to the expected influx of workers who would be employed at the revitalized Lake Berryessa resorts, who would otherwise have limited housing options in close proximity to their workplaces near the lake. Through Housing Element Program H-6b, the County is taking a place-based approach to stimulating job growth in the Lake Berryessa area and improving access to jobs for existing as well as future residents in Spanish Flat and other areas surrounding the lake. The other sites closer to the City of Napa would have reasonably good access to jobs, since the City of Napa represents the largest concentration of jobs in the county. The Imola Avenue site is relatively close to large concentration of jobs in the Napa Airport Industrial Area, just to the south of the City of Napa. Further, jobs in and around the City of Napa are made more accessible by the fact that Vine provides the most transit options in the City of Napa area, to connect workers with jobs.

Figure 106: Housing Sites in Relation to Job Access



Local Data and Knowledge

Overall, unincorporated Napa County has had limited opportunities for lower-income households to live in the unincorporated area. Thus, the existing population tends to be White and relatively low-income. By distributing lower-income housing sites across multiple locations, the Housing Element sites inventory will help to distribute lower income households into the unincorporated area, which will likely also help to racially and ethnically diversify the unincorporated area population. While the Spanish Flat site may appear to be disadvantageous for lower-income households by some measures, the intent of the site is to encourage affordable housing options for employees of the recreation and hospitality sector in close proximity to revitalized resorts near Lake Berryessa. Key data are missing to evaluate the benefits of the Imola site; however, residents of affordable housing at this site will have access to jobs and services in the City of Napa, as well as proximity to Creekside Middle School and the open space amenities of Skyline Park.

Summary of Conclusions and Approach to Policies and Programs

Overall, the housing sites inventory does not exacerbate fair housing issues such as contributing to R/ECAPS, RCAAs, or racial or ethnic isolation or segregation. It does not overly concentrate lower income housing opportunity sites in any single area of the unincorporated county; nor does it concentrate lower-income housing opportunity sites in areas that already have significant concentrations of poverty or areas of racial or ethnic isolation or segregation. In contrast, opportunities for housing development for lower-income households are identified in areas where the new housing will likely help to better integrate areas that are currently predominantly White and upper income. Although the Spanish Flat site is in an area of lower opportunity, the County is actively working to increase opportunity in this area via Housing Element Program H-6b by providing better access to jobs through an RFP process to bring new concessionaires to the Lake Berryessa area, who will need employees to work in their businesses. Further, the new concession operations will bring additional services and amenities that can benefit area residents as well as their primary tourist clientele.

The County of Napa's housing sites inventory, which fully accommodates the County's RHNA for the 2023 to 2031 planning period, along with a substantial buffer, also helps to affirmatively further fair housing from a regional perspective by creating opportunities for housing development for households at all income levels within a region that is generally not as diverse as the larger San Francisco Bay Area, but which offers a desirable quality of life.