

Attachment C

General Plan Consistency Analysis

2023 Housing Element Update Rezonings

General Plan Consistency Analysis

The following General Plan Goals and Policies are applicable to the proposed 2023 Housing Element Foster Road and Spanish Flat rezones:

Agriculture and Land Use Element:

Goal AG/LU-2: Concentrate urban uses in the County's existing cities and town and urbanized areas.

Finding: Consistent

Comment: The ordinance proposes to rezone two locations in the County that were identified in the 2023 Napa County HEU as appropriate for the development of multiple-family housing development. The Spanish Flat site is located in the community of Spanish Flat. The General Plan designation for the site is Rural Residential and the existing zoning is Commercial Neighborhood. The Napa County General Plan describes the Spanish Flat area as one of the County's 'Urban Bubbles' (AG/LU-49), an informal term used to describe areas in Napa County that are designated Rural Residential or Urban Residential on the County official Land Use Map. The Foster Road site is located along Foster Road, within the City of Napa's sphere of influence and their Rural Urban Limit line. The existing General Plan designation is Rural Residential and the existing zoning district is Agricultural Watershed with an Urban Reserve overlay. Unincorporated lands within the City of Napa RUL are governed by General Plan policies AG/LU-116 and AG/LU-128 which collectively establish a policy of annexation of land into the City of Napa before further urbanization takes place.

Policy AG/LU-22: Urban uses shall be concentrated in the incorporated cities and town and designated urbanized areas of the unincorporated County in order to preserve agriculture and open space, encourage transit-oriented development, conserve energy, and provide for healthy, "walkable" communities.

Finding: Consistent

Comment: Please refer to Staff analysis of Goal AG/LU-2

Policy AG/LU-23: Consistent with longstanding practice and "smart growth" principles, the County will enact and enforce regulations that will encourage the concentration of residential growth within the County's existing cities and town and urbanized areas designated on the Land Use Map.

Finding: Consistent

Comment: Please refer to Staff comments on Goal AG/LU-2. The Spanish Flat site was identified in large part because of access to water and wastewater utilities at the Spanish Flat Water District being able to

support the higher residential densities proposed in the HEU. Government Code require that these densities be supported through community water and wastewater systems. It is expected that the Foster Road site will annex to the City of Napa prior to further urbanization actions, subject to an agreement with the City for Napa County to claim RHNA credit for the resulting housing units. This action would be consistent with General Plan policies AG/LU-116 and AG/LU-128, as well as the intent of the Urban Reserve Combination District (NCC 18.100.010).

Policy AG/LU-25: The County opposes the creation of new special districts planned to accommodate new residential developments outside existing urbanized areas, except as specified in the Housing Element or as permitted within the Napa Pipe Mixed Use designation.

Finding: Consistent

Comment: The two sites proposed for rezoning were identified and evaluated in the 2023 Napa County Housing Element Update. No new special districts are proposed to accommodate new residential development on the two sites. The Spanish Flat site is within the existing Spanish Flat Water District, which provides both water and wastewater service. The Foster Road site will receive water from the City of Napa when annexation is completed, and is located within the service area of the Napa Sanitation District.

Policy AG/LU-28: Consistent with the County's longstanding commitment to urban-centered growth, new multi-family housing and other urban uses shall be directed to the incorporated cities and town and urbanized areas of Napa County.

Finding: Consistent

Comment: Please refer to Staff analysis of Goal AG/LU-2

Policy AG/LU-30: The County shall use a variety of strategies to address its long-term housing needs and to meet the state and regional housing requirements in its cyclical updates of the Housing Element. In addition to working with the state and ABAG to reduce the County's regional allocation, these strategies shall include:

- Consider re-use of former industrial sites designated as Study Area on the Land Use Map to provide for a mix of uses, including affordable and market rate work force housing as appropriate.
- Use of overlay designations to permit/facilitate multi-family housing on specific sites within designated urbanized areas shown on the Land Use Map.
- Collection and disbursement of housing impact fees to subsidize construction of affordable housing.
- Cooperative agreements with incorporated agencies within the County where these jurisdictions are able to accept additional housing requirements in exchange for other considerations.
- Actions that provide housing to farm workers and their families.

- Use of County-owned land for affordable housing where this land is no longer needed to meet the County's operational requirements and would be appropriate for housing.
- Other policies and programs which address the need for workforce housing.

Finding: Consistent

Comment: The County recently adopted an update to the Housing Element of the Napa County General Plan for the Sixth housing cycle (2023 – 2031). Specific to this proposed ordinance, which seeks to implement various programs and objectives from the 2023 Housing Element, the Spanish Flat site is proposed to be rezoned from its existing Commercial Neighborhood (CN) zone to a Commercial Neighborhood : Affordable Housing Combination District overlay. This overlay would allow for the potential development of multiple-family housing development at the site, in compliance with bullet 2 above. The Spanish Flat site has an existing General Plan designation of Rural Residential and is designated as an 'Urban Bubble' in the County's General Plan.

Policy AG/LU-31: The County will work with the cities and town to see that low and moderate cost housing is provided to address the needs of low and moderate income households in Napa County. In addition, the County will accept responsibility for meeting its fair share of the housing needs, including a predominant percentage generated by any new employment in unincorporated areas.

Finding: Consistent

Comment: The ordinance proposes modification to Title 18, which would update affordability requirements for multiple-family housing developments on Residential Multiple and Affordable Housing Combination District zoned sites. The updated affordability requirements include allocations of both low- and moderate-income dwelling units depending on the zone and permitting process. When considering the allowable densities at these sites and the affordability requirements in the ordinance there is the potential for more than enough potential dwelling units to meet Napa County's fair share of the Sixth Cycle RHNA allocation of 61 very low- and low-income units, 14 moderate-income units and 31 above moderate-income units.

Policy AG/LU-58: The "urbanized" area of Angwin shown on the County's land use map and zoned Planned Development shall contain institutional uses (i.e., the college), residential uses, and limited neighborhood-serving non-residential uses. (Also see Policy AG/LU-53.)

Finding: Consistent

Comment: The proposed ordinance does not make any zoning district changes to the uses permitted in Angwin's existing Planned Development : Affordable Housing Combination District sites and elsewhere in the Angwin area.

Policy AG/LU-80: Spanish Flat. Spanish Flat lies at the heart of the Lake Berryessa recreational area and should be viewed as its primary resort community, with affordable housing for those who work in the area and an attractive "village center" providing commercial services to locals and visitors.

Finding: Consistent

Comment: The Spanish Flat site is proposed to be rezoned from the existing zoning district of Commercial Neighborhood (CN) to Commercial Neighborhood : Affordable Housing Combination District. Approval of the rezone and modification to Title 18 of the Napa County Code would allow for the development of multiple-family housing at densities considered by the State of California as appropriate for the development of lower-income housing and for those who work in the area. Modifications to Title 18 would also require a minimum of 15% of any future multiple-family housing development be deed restricted affordable to lower-incomes. No changes are being made in the uses permitted in the remainder of the Spanish Flat area.

Policy CIR-3: The County will seek to concentrate multi-unit housing development in proximity to employment centers and services to increase the percentage of work trips that are by modes other than private drive-alone automobile.

Finding: Consistent

Comment: The Foster Road site is located adjacent to the City of Napa and within the city's Sphere of Influence. The site is located .5 miles from the Imola Avenue/Foster Road Vine Trail bus stop, which provides access to Route F of The Vine (bus services). Route F runs along Imola Avenue between Soscol Avenue and Foster Road, providing access to the services and employment centers adjacent to that road. The route also provides access to downtown Napa and the Soscol Gateway Transit Center, providing further access to other routes with The Vine as well as regional transit access. The site is also .7 miles from the Imola Avenue Park & Ride.

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

Policy CC-44: The County shall require that appropriate noise mitigation measures be included when new residential developments are to be built in close proximity to significant noise sources.

Finding: Consistent

Comment: The sites proposed for rezoning were evaluated for the potential of noise impacts in the 2023 Housing Element EIR. Neither site is located in close proximity to significant noise sources.

Policy H-2b: Encourage the construction of new affordable housing units within designated urban areas at densities that are commensurate with the availability of public or private water and sewer systems. These units shall be affordable to persons of extremely low-, very low-, low- and/or moderate-income.

Finding: Consistent

Comment: The ordinance proposes to rezone two locations in the County that were identified in the 2023 Napa County HEU as appropriate for the development of multiple-family housing development. The sites are located in designated urban areas, as evidenced in the analysis of other General Plan policies in this consistency analysis, with available water and sewer systems. The sites were also reviewed and analyzed in the HEU EIR, at densities allowed under the proposed modifications to Title 18, for the availability of and potential impact to public water and sewer systems, and mitigation measures were adopted to reduce potential impacts to less than significant.

The modifications to Title 18 include requirements that any multiple-family development project affordably restrict a minimum of 15% of their for-sale or rental units to lower incomes.

Policy H-2c: Use inclusionary housing to promote development of a full range of housing types in the County and ensure that multifamily projects and subdivisions include onsite affordable housing components.

Finding: Consistent

Comment: The ordinance proposes to make modifications to the affordability requirements of Title 18. Under the proposed code modifications both existing and proposed sites for multiple-family housing development would be required to allocate a certain percentage of their dwelling units at below market rates.

Policy H-2e: Continue to use the Affordable Housing (:AH) combination zoning district as an incentive for affordable housing production.

Finding: Consistent

Comment: The ordinance proposes to rezone one of the two sites with the Affordable Housing Combination district overlay (Spanish Flat) and is retaining the :AH overlay on other sites.

Policy H-2h: Maximize the length of time that affordable housing units stay affordable, particularly when units are developed using Affordable Housing Fund monies, produced through the inclusionary housing program, built upon County-owned land, or receive other forms of County assistance. Typically, such units shall be deed restricted as affordable for a minimum of 40 years.

Finding: Consistent

Comment: Modifications to Title 18 for the Residential Multiple and Affordable Housing Combination Zoning Districts require that applicants submit an affordable housing plan and enter into agreements with the county consistent with the provisions of Section 18.107.130 and Section 18.107.140, which require affordable deed restrictions last at a minimum of 40 years.

Policy H-4a: Permit multifamily housing within designated urban areas of the County where public services are adequate or can be made available. Individual single-family residences, legal accessory

dwelling on commercially zoned parcels, farm labor dwellings and farmworker housing, and second units may be located outside of designated urban areas.

Finding: Consistent

Comment: The ordinance proposes to rezone two locations in the County that were identified in the 2023 Napa County HEU as appropriate for the development of multiple-family housing development. The Spanish Flat site is located in the community of Spanish Flat. The General Plan designation for the site is Rural Residential and the existing zoning is Commercial Neighborhood. The Napa County General Plan describes the Spanish Flat area as one of the County's 'Urban Bubbles' (AG/LU-49), an informal term used to describe areas in Napa County that are designated Rural Residential or Urban Residential on the County official Land Use Map. The ordinance proposes to rezone 10 acres of this site with the Affordable Housing Combination District overlay (:AH), whose site selection criteria in Napa County Code Section 18.82.100 is describe as;

- A. Parcels are located within the designated "urban bubbles" as shown on the Napa County land use plan.
- B. The sites do not have a general plan designation of agriculture, watershed and open space or agricultural resource.
- C. The sites are underutilized and retain a significant amount of development potential.
- D. The possibility exists for adequate sewer and water infrastructure to accommodate higher density development.

The Spanish Flat site meets these four objectives of site selection for the :AH zone. The site is largely vacant, containing only three existing vacant buildings. The site is also located within the Spanish Flat Water District, which would supply water and wastewater services to the site. The impact of future multi-family development at this site on the utility systems was analyzed in the 2023 HEU FEIR and found to be adequate with mitigation measures applied to ensure that capacity is available at the site of building permit issuance.

The Foster Road site is located along Foster Road, within the City of Napa's sphere of influence and their Rural Urban Limit line. The existing General Plan designation is Rural Residential and the existing zoning district is Agricultural Watershed with an Urban Reserve overlay. The ordinance proposes to rezone a 5-acre portion of the parcel to the County's Residential Multiple zoning district, maintaining the Urban Reserve overlay. Development which would further urbanize the area (discretionary approvals & subdivision) is expected to annex into the City prior to approval. Annexation into the City of Napa would provide the site with access to City of Napa water services, and the site is located within the Napa Sanitation District.

Policy H-4e: Support housing production and maintain appropriate zoning in areas where the land and location can support increased densities and development of additional affordable housing units.

Finding: Consistent

Comment: The proposed rezonings are located in areas that were identified and analyzed as part of the 2023 Napa County Housing Element Update as appropriate for the development of lower-income

multiple-family housing development. The rezoning ordinance would, along with the change in zoning district designations for the two sites, modify the respective zoning district text within the Napa County Municipal Code, requiring a minimum of 20 DU/acre and allowing a maximum of 25 DU/acre. The 2023 Napa County Housing Element Update identified sites that would have access to community water and wastewater systems which can support these densities and mitigation measures contained in the 2023 HEU FEIR would require project sponsors to demonstrate the sufficient water supply and wastewater treatment capacity is available prior to building permit issuance.

Policy H-5k: Expedite permit processing for projects that meet or exceed the County's inclusionary requirements by providing affordable units on-site.

Finding: Consistent

Comment: The ordinance proposes to make modifications to various sections of the Napa County Municipal Code consistent with Objective H-4d of the Napa County Housing Element which includes providing 'by-right' processing for multiple-family developments proposing a minimum of 20% lower income housing in either for-sale or rental projects. The County's existing Inclusionary Ordinance requirements require, for projects consisting of 4+ units, an affordability allocation of 17% moderate-income for single-family detached projects, 20% moderate-income for attached and common interest projects and the payment of housing fees for rental projects.

Policy H-6c: Consistent with General Plan Policy CON-65 and CON-67, consider greenhouse gas emissions in the review of discretionary housing projects and promote "green building" design.

Finding: Consistent

Comment: The ordinance proposes to make modification to various sections of the Napa County Municipal Code including the addition of Section 18.60.120 and 18.82.070.B, which would tie the mitigation measures adopted with the Final Environmental Impact Report of the 2023 Napa County Housing Element Update to multiple-family development projects at both of the rezoning sites. The Final Environmental Impact Report of the 2023 Napa County Housing Element considered and analyzed Greenhouse Gas Emissions for the proposed housing development projects and included Mitigation Measure GHG-1 to reduce GHG emissions from building energy use and motor vehicle trips. Mitigation Measure GHG-1 includes the following project requirements;

- a) All new residential development proposed as part of the HEU shall be designed to be 100 percent electric with no natural gas infrastructure for appliances, including water heaters, clothes washers and dryers, HVAC systems, and stoves.
- b) Subsequent residential development projects proposed as part of the HEU shall be designed to comply with EV requirements in the most recently adopted version of CALGreen Tier 2 at the time of project-specific CEQA review.
- c) Implement Mitigation Measure TRA-1 included in Chapter 4.15, Transportation (Transportation Demand Management Program)