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Revision Matrix

Revisions to the Housing Element Amendment of the Napa County General Plan for the Sixth Cycle Planning Period

Summary of HCD Comments on January 24, 2023 Housing Element and Proposed Revisions

HCD Comment (a)	Description of Revisions Completed in Response to Comment Letter and HCD Technical Assistance (b)	Pages Where Revisions Can Be Found (b)
Assessment of Fair Housing: HCD's prior review found the assessment of fair housing should add date and analysis that compares the County to the broader Bay Area region. The element generally describes broader Bay Area regional patterns and trends for concentrated areas of affluence and displacement (p. 142). However, it must still analyze the County relative to the rest of the Bay Area region for other components of the assessment of fair housing such as segregation and integration (e.g., income, race, disability, familial status), disparities in access to opportunity and disproportionate housing needs (e.g., overpayment and overcrowding).	Added comparisons to Bay Area Region on the pages as indicated. Added 9-county Bay Area median (\$105,786) and discussion of the fact that the Unincorporated County median (\$108,961) is comparable to the Bay Area median (page 198). Added discussion of 492% overall and 487% lower-income buffer at page 359. Added discussion of the fact that working with City of Napa has been the most effective strategy for developing affordable housing (i.e., Napa Pipe) so Foster Road and Imola Ave build on that while Spanish Flat still provides opportunity for housing in the rural area, at page 359.	Segregation and integration (e.g., income) (p. 198), % of ELI households in relation to Bay Area and % of HH above median for Uninc. County vs. North Bay region (p. 199) race (p. 165), disability (p. 191), familial status (p. 193-194, 355), disparities in access to opportunity (p. 210-213, 342) and disproportionate housing needs (e.g., overpayment (p. 231, 350) and overcrowding (p. 235, 353). Discussion of lower income RHNA buffer (p. 359). Discussion of effectiveness of working with cities (p. 359).
Disproportionate Housing Needs and Displacement Risk: In response to HCD's prior review, the element now includes some general discussion on homelessness (pp. 63 and 125) and additional analysis on fire hazards (p. 213) but must still include data, spatial analysis, and conclusions on patterns related to housing conditions and homelessness. As an example, the element identifies persons camping or sleeping in cars during the summer, with most individuals thought to be farmworkers. The element could identify locations in the unincorporated areas of the County where this is often observed and target outreach and additional services to support farmworkers and other persons experiencing homelessness in these areas.	Added text to add information about specific locations where homeless encampments are observed and what services and resources are available to the homeless. Added text to describe the planned homeless count in Fall 2023, to better understand homeless needs during harvest season. Added text in the Farmworkers section to indicate that findings from the Fall 2023 Homeless Count would be used to inform actions under Program H-3k. Modified Program H-3k to indicate that implementation of the Farmworker Housing Study recommendations would take into account findings from the Fall 2023 Homeless count. Page 118 of the adopted Housing Element indicated that units in need of repair tend to be in the areas around Angwin, along Silverado Trail north of St. Helena, east of the City of Napa, or near Lake Berryessa. Programs H-1a and H-1b have been modified to include geographic targeting for housing rehabilitation programs to these areas. Added text at pages 145-146 to describe services available to homeless encampments.	Pages 145-146, 148, 154-156 and Table 7 (Programs)
Sites Inventory: In response to HCD's prior review, the element now includes a discussion of identified sites relative to concentrated areas of affluence and poverty but should include similar discussion, including quantification of the regional housing needs allocation (RHNA) by income group and location, for median income, disability, familial status, disparities in access to opportunity, overpayment and overcrowding.	Added maps and text to discuss housing sites in relation to median income, disability, familial status, overcrowding, and overpayment. The adopted Housing Element already included analysis of the sites in relation to access to opportunity (pages 342-343), in relation to job access (p. 346-347), transportation access (344-345), and environmental conditions (340-341). Added text to discuss how County's approach to moderate- and above moderate-income housing would affect distribution of these income groups. (Page 332, 359.)	Pages 332, 340-347, 359
Other Relevant Factors and Local Data and Knowledge: The element generally was not revised to address this finding. Please see HCD's prior review for additional information.	Added discussion of local affordable housing programs, ramifications of low-density zoning, lack of community water and sewer systems, redlining (lack of) and employer locations in relation to housing locations. Added discussion of ramifications of lack of community water and sewer systems and impacts on lower-income households.	Pages 239-242
Contributing Factors to Fair Housing Issues: Upon a complete analysis, the element should re-assess and prioritize contributing factors to fair housing issues.	No changes made based on edits to adopted Housing Element. AFH conclusions of adopted Housing Element specifically mentioned lack of community water and sewer (p. 245) and on this basis the HE identifies issues with lack of higher density housing opportunities and particular impact on farmworkers. The Fair Housing Goal, Priority, Programs of the adopted Housing Element identified multiple programs addressing the identified issues and conclusions (p. 248-249.)	N.A.

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<p>Programs: As noted above, the element must be revised to add or modify goals and actions based on the outcomes of a complete analysis. Goals and actions must specifically respond to the analysis and to the identified and prioritized contributing factors to fair housing issues and must be significant and meaningful enough to overcome identified patterns and trends. Actions must have specific commitment, milestones, geographic targeting and metrics or numerical targets and, as appropriate, address housing mobility enhancement, new housing choices and affordability in higher opportunity or higher income areas, place-based strategies for community preservation and revitalization and displacement protection, including disaster-driven displacement.</p>	<p>Modified Program H-2b to include current inclusionary percentages as objective with understanding that if the nexus study update in 2025 calls for updates to the %, those percents will become the new objective. Added goal of 10 new inclusionary units and added geographic targeting of at least 50% of new inclusionary units in high resource areas.</p> <p>Modified Program H-2d to add, "Target at least 50 percent of assisted new units in high resource areas, higher median income, and RCAAs. Target at least 60 assisted new units during the 6th Cycle."</p> <p>Modified timing for Program H-2g from January 2024 to July 2024. Modified Program H-2i to add, "Target of at least 50 percent of new ADUs assisted in areas of higher resource areas, areas with median income above the countywide median, and in RCAAs."</p> <p>Modified Program H-3k to indicate that implementation of the Farmworker Housing Study recommendations would take into account findings from the Fall 2023 Homeless count.</p> <p>Modified Programs H-3g and H-3k, to add, "placing priority on sites with access to shopping, schools, and services" to the objectives. Also added to H-3k, "Also utilize findings from the Fall 2023 homeless count to target outreach to homeless farmworkers and identify actions to implement the recommendations of the Farmworker Housing Study."</p> <p>Modified timing for Program H-3h from December 2024 to July 2024. Modified timing for Program H-3j from 12 months from HE adoption to 12 months from HE certification.</p> <p>Modified Program H-4f, to increased the objective 10 rebuilt MH spaces to 20.</p> <p>Modified timing for Program H-4k to initiate work with water providers from 12 months from HE adoption to 12 months from HE certification.</p> <p>Modified timing for Program H-4m from initiate discussion with DGS by December 2023 to July 2024 and modified timing to secure commitments for utility services from June 2024 to December 2024.</p> <p>Modified timing for Program H-4n to initiate negotiations with City of Napa by January 1, 2024 to July 1, 2024.</p> <p>Modified timing for Program H-5f (Master Fee Schedule update component) from December, 2023 to July, 2024.</p> <p>Added Program H-6c calling for the County to prioritize the CIP and explore and pursue funding for community development and place-based strategies in areas with relatively lower income households at least once every two years, with a goal of 6-8 projects in these areas within the 6th Cycle; includes engaging with NVTA's process to develop an ATP for seniors, Vine Trail, and SR2S, to advocate for improvements to serve lower-income areas of the county, and also to involve lower-income communities in identifying and prioritizing CIP investments.</p> <p>Added Program H-6d calling for County to provide continued support for NVCH Homesharing program with a goal of assisting 20 to 50 persons during the 6th Cycle, and for County to work on implementing SB-9 and identifying areas where SB-9 would work in the unincorporated area with a goal of supporting an additional 15 to 20 units via SB-9 subdivisions, with at least 50 percent of persons assisted and new units in areas of high resource area, areas with median income above the countywide median, and RCAAs.</p>	<p>Table 7 (Programs)</p>

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HCD Comment (a)	Description of Revisions Completed in Response to Comment Letter and HCD Technical Assistance (b)	Pages Where Revisions Can Be Found (b)
<p>Farmworkers: HCD's prior review found, given the significant need in the County, it should specifically evaluate trends, characteristics, disproportionate needs, effectiveness of resources and strategies, magnitude of the housing need, including disproportionate housing needs. In response, the element now explains the County's farmworker study is not complete but includes a program to complete the study. However, the element must still include an analysis of the housing needs of farmworkers. The analysis may utilize past farmworker housing studies and other studies generally applicable to their special housing needs. For example, the element could utilize a recent study conducted by University California at Merced that is available at https://clc.ucmerced.edu/sites/clc.ucmerced.edu/files/page/documents/fwh_s_report_2.2.2383.pdf. Please see HCD's prior review for additional information. Based on the outcomes of the analysis, the element should add or modify programs to address this significant special housing need in the region.</p>	<p>Added farmworker needs information from both NSC EWG and UC Merced Study. Added some more references to HE programs that address needs identified in these two resources. Based on discussion of the variety of programs addressing farmworker housing needs, the existing revisions were deemed adequate; however, HCD staff suggested formally recognizing the farmworker centers via a program. This is already done in Program H-3f, which calls for monitoring the occupancy of existing farmworker centers to document need for expanded supply. Added, "This may include collaboration with the cities to develop new farmworker housing, as was done successfully in the 5th Cycle." to H-4i. Added "or at least annually, and ongoing" to timing for program H-6a in addition to whenever waiting lists open for new affordable housing projects, per HCD request.</p>	<p>Page 154-156 and Table 7 (Programs)</p>
<p>Environmental Constraints: While the element now discusses potential environmental constraints on identified sites, it should still address any other known conditions or impacts on identified sites (e.g., topological features, shape, contamination, easements, conditions, and compatibility). This is especially relevant to the Spanish Flat, given that this area has been identified in prior housing element cycles.</p>	<p>Added language in regards to other potential environmental constraints: <u>Furthermore, the Foster Road and Imola sites are not impacted by extreme topography challenges. While the Spanish Flat site has some sloping terrain, the unit capacity of the site takes the topography into consideration and does not assume development of 20 units per acre on the entire site, but rather assumes a 50% capacity. None of the sites in the inventory have an abnormal shape or hazardous site designations.</u> Language describing other known site conditions was incorporated into the Environmental Constraints section.</p>	<p>Pages 301-302, 306-307</p>
<p>Electronic Sites Inventory: Although the County has submitted the electronic sites inventory as described in the prior review, if any changes occur, the County should submit revisions as part of any future re-adoption or submittal. Please see HCD's housing element webpage at https://www.hcd.ca.gov/planning-and-community-development/housing-elements for additional information.</p>	<p>Spanish Flat site capacity updated for each APN and the total site acreage for the Foster site has been split between the two Foster APNs</p>	<p>Table 54 (Sites Inventory).</p>
<p>Zoning for a Variety of Housing Types (Emergency Shelters): Please be aware Chapter 654, Statutes of 2022 (AB 2339), adds specificity on how cities and counties plan for emergency shelters and ensure sufficient and suitable capacity. Future submittals of the housing element may need to address these statutory requirements. For additional information and timing requirements, please see HCD's memo at https://www.hcd.ca.gov/sites/default/files/docs/planning-and-community/ab2339-notice.pdf.</p>	<p>N.A.</p>	<p>N.A.</p>
<p>Programs: As noted above, the element does not include a complete site analysis, therefore, the adequacy of sites and zoning were not established. Based on the results of a complete sites inventory and analysis, the County may need to add or revise programs to address a shortfall of sites or zoning available to encourage a variety of housing types. In addition, the element should be revised as follows:</p>	<p>Added Programs H-4m and H-4n. See below.</p>	<p>Table 7 (Programs)</p>

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<p>Program H-4g (Large Sites): While the Program commits to assist property owners with subdivision, it should also establish incentives, clearly commit to parceling for all sites at appropriate sizes (e.g., 1 to 10 acres) and should include alternative actions if parceling is not completed as anticipated by a date early in the planning period.</p>	<p>Added text on to document strong property owner interest in subdividing and developing housing; thus not needing to offer special incentives to subdivide. Modified program H-4g to clarify objective of approving TSM for at least one parcel 10 acres or smaller by 12/31/27 and to specify that County would take alternate action to identify a replacement site if a new parcel is not created by 12/31/27 and if needed to fully accommodate the 6th Cycle RHNA and complete rezoning within one year. Modified program H-4g to provide specific dates to engage with property owner and approve TSM. Modified H-4g to specify that County will complete rezoning of alternate site within one year, if necessary.</p>	<p>Page 321 and Table 7 (Programs)</p>
<p>State-Owned Sites: As noted in the prior review, the element should include a program with specific commitment and a schedule of actions with discrete timelines and numerical objectives to facilitate development on the identified state-owned site. Examples of actions include coordination with the State, rezoning, facilitating entitlements, including environmental review, infrastructure, assisting with funding and alternative actions if development does not occur as anticipated.</p>	<p>Added new Program H-4m: Work with State of CA to Develop Housing on Imola Avenue Site and added the following text on pages 324-325 as part of the sites inventory discussion of the Imola Avenue site: <u>The County has included Housing Element Program H-4m, which outlines the County's commitments to facilitate and monitor the State's process for developing affordable housing at the site, and commits the County to identify an alternate site as necessary to fully accommodate the County's 6th Cycle RHNA if it becomes clear that the Imola Avenue site will not be able to support housing development that be completed by the end of the planning period in 2031.</u> Modified program H-4m to specify that the County will complete rezoning of alternate site within one year. Modified program to specify that the County will coordinate with state officials on an ongoing basis.</p>	<p>Page 324-325 (Imola Avenue Site) and Table 7 (Programs).</p>
<p>Annexation: In response to HCD's prior review, the element includes additional information on the Foster Road site (p. 289) that indicates the County is in discussion with the City of Napa to determine the details and timing of the annexation. These revisions do not address HCD's finding. Please see HCD's prior review for additional information.</p>	<p>See new Program H-4n in Table 7, including deadline of June, 2029 to complete any rezoning necessary to accommodate RHNA if Foster Road annexation is not proceeding timely, per HCD staff request.</p>	<p>Page 328 (Foster Road Site) and Table 7 (Programs).</p>
<p>Local Processing and Permit Procedures: The element now includes additional information on the PD district (pp. 242-243). However, the element was not revised to address higher density projects being subjected to a conditional use permit (CUP) in the affordable housing combining district (AHCD). Please see HCD's prior review for additional information. Further, the element should address public comments on this revised draft submittal and discuss compliance with the Permit Streamlining Act and intersections with CEQA and timing requirements, including streamlining determinations and add or modify programs as appropriate.</p>	<p>Program H-5f in Table 7 (Programs) has been modified to include removal of CUP requirement for multifamily from AHCD sites as well as in RM zoning. Typical Processing Timeframes and Environmental Clearance section has been updated regarding Permit Streamlining Act as follows: <u>All discretionary projects are reviewed for completeness within 30 Before any development permit is granted, environmental clearance is required to assess the project's potential impact. All discretionary projects are reviewed for completeness within 30 days, in compliance with the Permit Streamlining Act. County staff makes a determination early on in the process as to whether the project is exempt from CEQA, or requires preparation of a Negative Declaration (ND), Mitigated Negative Declaration (MND), or Environmental Impact Report (EIR). CEQA determinations are made concurrently with initial processing once an application has been received and accepted as complete, so they can be reviewed by the approval authority concurrently with project entitlement.</u></p> <p><u>Processing times can vary significantly based on the size and complexity of a project, the extent of required revisions and the applicant's responsiveness to feedback provided by staff, and the timing of applicant resubmittal. While approval times are typically lengthened for projects that are not exempt from CEQA, require rezoning or general plan amendments, or encounter community opposition, all CEQA determinations and required noticing is completed within the timelines required by State law and in a manner consistent with the Permit Streamlining Act (PRC 21080.1 and 21080.2). The County is required to determine whether a project application is complete or not within 30 days after submittal.</u></p>	<p>Pages 270-271 and Table 7 (Programs)</p>

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Constraints on Housing for Persons with Disabilities: In response to HCD's prior review, the element now includes additional information on its procedures, specifically for fees and appeals (pp. 251-252). However, the element must still evaluate the reasonable accommodation decision-making criteria such as approval findings for any potential constraints on housing for persons with disabilities.	Revised findings to indicate that existing RA procedure is not compliant and Program H5-f will update the procedure to make it consistent with fair housing law.	Page 279, Table 7 (Programs).
Program H-5f (Zoning Amendments – Group Homes): The Program should specifically commit to allow group homes for seven or more persons in all zones allowing residential uses in addition to permitting the use the same as other residential structures of the same type in the same zone.	Made Program H-5f as requested in HCD comment letter.	Table 7 (Programs)
Program H-5f (Zoning Amendments – Land Use Controls): In response to HCD's prior review, the element now includes revisions to Program H-5f (Update County Code to Align with State Housing Laws) that address constraints on parking requirements. However, Program H-5f should include a timeline and commitments to conduct the outreach described and remove identified constraints, if necessary.	Made requested edit to Program H-5f by including an intermediate deadline to complete required public outreach by July, 2024. Also clarified that "all necessary" Code updates would be completed by Decemer 2024, which would remove identified constraints.	Table 7 (Programs)
<i>Change made due to pending changes in Fire Hazard Severity maps; not HCD comment.</i>	Revised text describing Fire Hazard Severity Zones to reflect pending map changes since November of 2022.	Pages 301-302

Notes:

- (a) Page numbers in HCD comments refer to page numbering of Housing Element Adopted January 24, 2023.
- (b) Page numbers in descriptions of revisions refer to numbering of redlined version of Housing Element with proposed revisions.