

| | HCD Revisions | Staff Comments |
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| 1 | <p>The element includes some information that describes the prior element's programs but in several cases (Programs H-1a, H-1b, H-2a, H-2g, H-2k, H-2l, and H-3g), the reported progress in implementation does not appear to be related to the objectives of the prior program. The element should describe the actual results of the prior element's programs relative to the objectives of past programs, compare those results to the objectives. Based on an evaluation of any differences between what was planned versus achieved, provide a description of how the objectives and programs of the updated element incorporate changes resulting from the evaluation.</p> | <p>Staff will review the 2022 General Plan Progress report and provide amended progress reports for the called out programs (Programs: H-1a, H-1b, H-2a, H-2g, H-2k, H-2l and H-3g) that better capture the program's progress in completing that program's objectives. Narrative will be added to Section 2: Evaluation of 5th Cycle Programs and Status for 6th Cycle Housing Element evaluating what was planned versus what was achieved. Staff will make changes to proposed 6th Cycle programs in Section 3 based on this evaluation.</p> |
| 2 | <p>In addition, as part of the review of programs in the past cycle, the element must provide an evaluation of the effectiveness of goals, policies, and related actions in meeting the housing needs of special needs populations (e.g., elderly, persons with disabilities, large households, female headed households, farmworkers and persons experiencing homelessness).</p> | <p>JP: (I don't have data on the total number of units rehabed during the 5th cycle. The County did replace two mobile homes thorough partnership with Habitat for Humanity, both of which are occupied by individuals at the extremely low income (30% AMI) threshold. We also invested construction captial to rehabilitate 5 units in a home owned by Catholic Charities to preserve them for Permanent Supportive Housing units set-aside for individuals experiencing or at-risk-of-experiencing homelessness. And the County (in 2020 and 2021) invested in two projects of 14-units and 54-units respectively to convert dilapidated multi-family apartments and fair-condition motel rooms into housing for individuals at-or-below 30% AMI. The County has also provided \$750K in predevelopment funding for the affordable units at the Napa Pipe site. Overall, the deed restriction of 55 years of affordability in exchange for Affordable Housing funds has been an effective tool for the creation of long-term affordable units. The County has additionally, when available, layered State funding for homeless services investments into these projects to further create set-aside units for individuals and families exiting homelessness. This same strategy was utilized to create 27-set aside units for farmworkers earning between 30-60% AMI in the most recent 88-unit affordable housing development. Finally, the County significantly increased the percentage of down payment assistance availalbe to low and moderate income members of the proximity workforce for the purchase of a home, from 10% to 16.5%, and reduced the down-payment a low-income homeowner is required to contribute to 1% from 3%. This has been a very effective change to assist low-income buyers with enough capital for a down-payment to both qualify for a mortgage and - in most cases - avoid having to purchase/finance private mortgage insurance.</p> |

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| 3 | <p>Fair Housing Enforcement and Outreach: The element must include analysis that describes the County's compliance with existing fair housing laws and regulations.</p> | <p>Identify for HCD where information is located, etc. Add information to explain in broad general strokes, how the county complies with AFFH laws. HCD staff (Chelsea) will send a sample.</p> |
| 4 | <p>Assessment of Fair Housing: The element includes data and analysis on each of the fair housing components at the local level. However, additional information is required to fully address this finding. Specifically, much of the regional data and analysis provided in each of the fair housing areas is limited to comparing the County to that of the North Bay region. The element should add additional data and analysis on the broader Bay Area geographical context and add or modify programs as appropriate depending on the outcomes of this analysis.</p> | <p>Existing North Bay comparison maps are good. Layer in some additional broad regional discussion. Pull elements from regional Analysis of Impediments to Fair Housing, and look for ABAG/MTC resources. Check San Mateo 21 Elements web site for possible regional analyses. Can also add some information from Urban Displacement Project displacement risk maps.</p> |
| 5 | <p>Racially Concentrated Areas of Affluence (RCAAs): The element indicates that there are no areas within the County designated as RCAAs. However, this comment does not accurately reflect the analysis that demonstrates parts of the County are characterized as higher income and having a significant White population. As a result, the element should include analysis of these factors for patterns within the County and relative to the broader Bay Area region. The analysis should utilize data provided by HCD. For more information, please see HCD's guidance at https://www.hcd.ca.gov/community-development/affh/index.shtml#guidance.</p> | <p>Revise with updated data. Acknowledge RCCA's that were identified based on newly available data.</p> |

Disproportionate Housing Needs and Displacement Risk: The element includes some data and analysis on overcrowded households and cost burdened households, but it must also include data and analysis on patterns related to housing conditions and homelessness. In addition, given that several areas in the County are particularly susceptible to fire hazards, the element must also analyze disaster-driven displacement and its disproportionate impacts on lower-income households and special needs populations, including displacement by looking at trends, patterns, local data and knowledge and other relevant factors.

JP: Request in to Jim/Alejandra for Local Assistance Center data. I do not have housing conditions data. I DO have homeless services data and analysis: Our point-in-time counts for 2017- 2019-2020-2021 show a data trend of 6% increase between 2020 (#464) and 2021 (#494), and a 30% increase between 2019 (#322) and 2020 (#64), and a 2% between 2017 (#315) and 2019 (#322). The greater jump from 2019 to 2020 is more reflective of a change in count methodology toward a comprehensive count of 100% of County census tracts rather than the prior method of few "representative" tracts, leaving out more remote areas.

From 2017 to 2020 (the most recent year of Statewide Counts), the number of people experiencing homelessness across California increased by 22%. Napa County saw a 46% increase in the same time period. This compared to similar increases in neighboring Yolo County (40%), and was considerably lower than Amador, Calaveras, Mariposa & Tuolumne Counties which saw a 127% increase.

As in many communities, people experiencing homelessness in Napa have been residing in Napa for a significant amount of time. In 2019, over 50% indicated they were longtime Napa residents having resided in the county for 10+ years. In 2020, 63% of individuals noted a 10+ year residence. Furthermore, PIT surveys also revealed that 84% of people experiencing homelessness in Napa became homeless while residing in Napa. The 14% who came from another county mainly came from neighboring counties, like Sonoma. State and other community data similarly shows that the vast number of people experiencing homelessness seek services in the place where they lived prior to becoming homeless. In addition, the Homeless Data Integration System (HDIS) shows that 96% of people access housing or services in a single service area, rather than traveling to other communities in search of help.

On the 2020 PIT count, when individuals were asked to identify the primary cause or condition that led to their homelessness, the top four responses were alcohol or drug use (29%), job loss (12%), mental health issue (11%), and eviction (10%). It is important to note that people experiencing homeless often lose housing due to a combination of factors, but these specific events or conditions were the ones people identified as precipitating their experience of homelessness. In comparison to data from nearby Solano, Sonoma, and Marin counties, Napa respondents more frequently reported alcohol or drug use as a cause of homelessness. In Napa, 29% of respondents reported alcohol or drug use as the primary cause of their homelessness, 11% of respondents in Solano, 14% in Marin, and 16% in Sonoma counties respectively reported alcohol or drug use as the primary cause of their homelessness.

This suggests the need for more widely available substance use treatment programs in prevention, diversion, and general service delivery within the system of care. This data aligns with survey and focus group comments from Napa providers indicating the need for

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| | <p>additional programs to serve people experiencing homelessness who are seeking treatment for substance use disorders.</p> <p>Finally, sub-populations in survey data indicate 27% of people experiencing homelessness are experiencing recurring or chronic homelessness, 9% are youth under 25, 6% are families, and 4% are veterans. Overall trends between 2017 to 2022 indicate a 200% increase in individuals experiencing unsheltered homelessness (again, likely owing to BOTH an overall population increase, and improvement in count methodology. Over the same period of time, the number of people experiencing chronic homelessness has remained relatively stable, while those experiencing homelessness for the first time has more than tripled.</p> |
| 7 | <p>Other Relevant Factors: The element must consider other relevant factors that have contributed to certain fair housing conditions. The element identifies various factors, but generally does not provide information that addresses this requirement. This analysis must consider information that is unique to the County or region, such as governmental and nongovernmental actions, historical land use and zoning practices (e.g., past redlining/greenlining, restrictive covenants, etc.), disparities in investment to specific communities, or other information that may have impeded housing choices and mobility. This analysis is particularly significant considering that the County is characterized by high housing costs, increasing displacement, and a lack of housing choices.</p> <p>Will look at using Napa-Sonoma Collaborative data/analysis that has come in since we developed the Draft. Also reaching out to the County Assessor's office.</p> |

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| <p>8</p> | <p>Local Data and Knowledge: The element does not address this requirement. The element includes some general information on page 273 but should supplement this analysis with local data and knowledge that captures emerging trends and issues, including utilizing knowledge from local and regional advocates, public comments, service providers, public officials and other planning documents. As an example, the element could draw from other sources of information including but not limited to, the Analysis of Impediments (AI), capital improvement plans, other planning documents, and knowledge from County staff.</p> | <p>JP: The Napa Continuum of Care and staff from the City and County of Napa initiated a Strategic Plan to Address Homelessness in 2022. The plan provides the homeless system of care and the greater Napa community with a shared context of how people are experiencing homelessness, detail strengths and gaps in the existing system of care and recommend goals and strategies to guide improvement efforts at the program, City, County, and community levels. It is meant to address the needs of the entire geography of Napa County, including all cities, incorporated areas, and unincorporated areas, and provide guidance for all stakeholders in the community. It represents input across all sectors and areas within the Napa community, including service providers, business leaders, City and County staff, and people with experiences of homelessness.</p> <p>The Plan resulted in the establishment of five overarching goals representing communitywide feedback on how to reach the larger community goal of making homelessness for individuals and families in Napa County rare, brief, and nonrecurring. The goals are intended to guide the Napa Continuum of Care’s (CoC) planning efforts to work towards a mutual shared interest and represent set of recommendations that will have to be adapted to address a dynamic and complex issue. They were developed through an extensive community feedback process. Achieving these goals will require funding and cross-system alignment.</p> <ol style="list-style-type: none"> 1. Expand access to permanent housing, including permanent supportive housing, rapid rehousing, and other housing opportunities, for people experiencing or at risk of homelessness. 2. Expand access to and quality of services for people experiencing homelessness in Napa County. 3. Ensure that Diversity, Equity, Inclusion, and Belonging are core considerations in program development and that all members of the community have equitable access to care. 4. Prevent households from becoming homeless for the first time, and rapidly rehouse newly homeless households. 5. Build upon cross-system partnerships and collaborations to target and serve all people experiencing homelessness in Napa County |
| <p>9</p> | <p>Contributing Factors: The element identifies several contributing factors (pp. 193-198) but should also prioritize these factors (e.g., high, medium, low).</p> | <p>Will prioritize the factors per HCD comment.</p> |

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| 10 | <p>Sites Inventory: While the element includes analysis relative to sites and affirmatively furthering fair housing (AFFH) (pp. 259-272) for some of the fair housing areas including by race, poverty, and access to opportunity, the element must also provide analysis on Racially Concentrated Areas of Affluence (RCAAs) and demonstrate whether sites identified to meet the regional housing needs allocation (RHNA) are distributed throughout the community in a manner that affirmatively furthers fair housing. A full analysis should address the income categories of identified sites with respect to location, the number of sites and units by all income groups and how that effects the existing patterns for all components of the assessment of fair housing (e.g., segregation and integration, access to opportunity). The element should also discuss whether the distribution of sites improves or exacerbates conditions. If sites exacerbate conditions, the element should identify further program actions that will be taken to mitigate this (e.g., anti-displacement strategies).</p> | <p>Demonstrate with a map of the new RCAA's. Augment discussion of distribution of sites/housing units by income category; explain that Above Moderate sites are distributed throughout the County.</p> |
| 11 | <p>Housing Condition: The element must estimate the number of units in need of rehabilitation and replacement. The element notes that there were 17 units with verified code violations between 2015-2022 (p. 88), but otherwise does not quantify the number of units countywide that require some form of rehabilitation or replacement. The analysis should include estimates from a recent windshield survey or sampling, estimates from the code enforcement agency, or information from knowledgeable builders/developers, including nonprofit housing developers or organizations. For additional information, see the Building Blocks at https://www.hcd.ca.gov/housing-stock-characteristics.</p> | <p>Staff is reaching out the the County's Code Enforcement division if they can provide any recent windshield survey or sampling estimates of unincorporated units in need of rehabilitation or replacement. Building division to provide builders/developers/nonprofits with sufficient knowledge of the county for whom Staff can contact for additional estimation.</p> |
| 12 | <p>Overpayment: While the element includes some quantification of overpaying households (p. 96), it must specifically quantify and analyze lower-income households paying more than 30 percent of their income on housing by total number and tenure (i.e., renter and owner).</p> | <p>Provide more data per HCD comment.</p> |

Homelessness: The element must include a current local estimate of the number of homeless individuals and families in need of emergency shelter. The element notes on page 113 that most of the homeless population is concentrated in the City of Napa and indicates that the count for the number of homeless in the unincorporated portion of the County is unavailable. Nevertheless, the element must still contain an estimate of homeless individuals in the unincorporated areas of the County. The element could utilize local data and knowledge from homeless providers to obtain this information.

JP: This is copying the same response from row 7: "Jim Diel (Assistant Director of HSSA - EOC) should have data related to demographics of disaster driven displacement. JP: Request in to Jim/Alejandra for Local Assistance Center data. I do not have housing conditions data. I DO have homeless services data and analysis: Our point-in-time counts for 2017- 2019-2020-2021 show a data trend of 6% increase between 2020 (#464) and 2021 (#494), and a 30% increase btween 2019 (#322) and 2020 (#64), and a 2% between 2017 (#315) and 2019 (#322). The greater jump from 2019 to 2020 is more reflective of a change in count methodology toward a comprehensive count of 100% of County census tracts rather than the prior method of few ""representative"" tracts, leaving out more remote areas.

From 2017 to 2020 (the most recent year of Statewide Counts), the number of people experiencing homelessness across California increased by 22%. Napa County saw a 46% increase in the same time period. This compared to similar increases in neighboring Yolo County (40%), and was considerably lower than Amador, Calaveras, Mariposa & Tuolumne Counties which saw a 127% increase.

As in many communities, people experiencing homelessness in Napa have been residing in Napa for a significant amount of time. In 2019, over 50% indicated they were longtime Napa residents having resided in the county for 10+ years. In 2020, 63% of individuals noted a 10+ year residence. Furthermore, PIT surveys also revealed that 84% of people experiencing homelessness in Napa became homeless while residing in Napa. The 14% who came from another county mainly came from neighboring counties, like Sonoma. State and other community data similarly shows that the vast number of people experiencing homelessness seek services in the place where they lived prior to becoming homeless. In addition, the Homeless Data Integration System (HDIS) shows that 96% of people access housing or services in a single service area,9 rather than traveling to other communities in search of help.

On the 2020 PIT count, when individuals were asked to identify the primary cause or condition that led to their homelessness, the top four responses were alcohol or drug use (29%), job loss (12%), mental health issue (11%), and eviction (10%). It is important to note that people experiencing homeless often lose housing due to a combination of factors, but these specific events or conditions were the ones people identified as precipitating their experience of homelessness. In comparison to data from nearby Solano, Sonoma, and Marin counties, Napa respondents more frequently reported alcohol or drug use as a cause of homelessness. In Napa, 29% of respondents reported alcohol or drug use as the primary cause of their homelessness, 11% of respondents in Solano, 14% in Marin, and 16% in Sonoma counties respectively reported alcohol or drug use as the primary cause of their homelessness. This suggests the need for more widely available substance use treatment programs in prevention, diversion, and general service

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| | | <p>delivery within the system of care. This data aligns with survey and focus group comments from Napa providers indicating the need for additional programs to serve people experiencing homelessness who are seeking treatment for substance use disorders.</p> <p>Finally, sub-populations in survey data indicate 27% of people experiencing homelessness are experiencing recurring or chronic homelessness, 9% are youth under 25, 6% are families, and 4% are veterans. Overall trends between 2017 to 2022 indicate a 200% increase in individuals experiencing unsheltered homelessness (again, likely owing to BOTH an overall population increase, and improvement in count methodology. Over the same period of time, the number of people experiencing chronic homelessness has remained relatively stable, while those experiencing homelessness for the first time has more than tripled."</p> |
| 14 | <p>Farmworkers: While the element notes the number of permanent and seasonal farmworkers, 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. The analysis may utilize past farmworker housing studies and should incorporate results from activities funded by Regional Early Action Planning Grants (REAP). Local officials, special needs service providers or County social and health service providers may also be able to assist with information to complete the analysis. Based on the outcomes of the analysis, the element should add or modify programs.</p> | <p>County hasn't yet done REAP study. NSC did not really get into farmworker info. Virtual meeting with Spanish-speakers was targeted for farmworkers - reference farmworker needs identified in that session; publicized through Farmworker Centers. Reference past studies as suggested in HCD comment. HCD staff also suggests focusing on what will be done with County's REAP funding for farmworker study and then commit to follow-up actions based on recommendations when study is completed. Will also include information about discussion of possible 4th farmworker center.</p> |
| 15 | <p>Parcel Listing: While the element lists sites by parcel number, parcel sizes, zoning, and general plan designation, it must also describe existing uses for its nonvacant sites. The element presents confounding information on pages 249-257 that identifies some sites are nonvacant. However, the element cannot identify a vacant portion of a site and consider the entire site vacant and should provide additional clarity or information on existing uses for parcels that constitute the entire site.</p> | <p>Additional language was added to the Housing Element to clarify that sites in the inventory are smaller portions of larger parcels that were identified using the site definition from Government Code 65863.2(c)(2)(B). A review of the existing uses was conducted on both nonvacant sites as well as vacant sites situated within larger parcels that have nonvacant uses.</p> |

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| 16 | <p>Large Sites: Sites larger than 10 acres in size are deemed inadequate to accommodate housing for lower-income housing unless it is demonstrated that sites of equivalent size and affordability were successfully developed during the prior planning period or unless the housing element describes other evidence to HCD that the site is adequate to accommodate lower income housing. The element indicates that there are five sites identified in the sites inventory as having parcels over 10 acres in size, notes that only a portion of those larger sites are being proposed for inclusion in the sites inventory and provides no further analysis on large sites identified in the sites inventory (p. 239). For your information, smaller subsets of large sites cannot be included in the inventory without adequate analysis. The element must include analysis for the suitability of large sites based on the entire acreage of these sites. Based on the outcomes of a complete analysis, the element should add or modify programs as necessary.</p> | <p>According to Government Code 65863.2(c)(2)(B), "A site larger than 10 acres shall not be deemed adequate to accommodate lower income housing need unless the locality can demonstrate that sites of equivalent size were successfully developed during the prior planning period for an equivalent number of lower income housing units as projected for the site or unless the locality provides other evidence to the department that the site can be developed as lower income housing. For purposes of this subparagraph, "site" means that portion of a parcel or parcels designated to accommodate lower income housing needs pursuant to this subdivision." Language was added to the Housing Element to clarify that based on the definition of a "site" presented in Government Code 65863.2(c)(2)(B), sites in the inventory are not large sites and do not exceed 10 acres in size. Additional analysis related to the existing uses within nonvacant sites as well as the larger portion of the nonvacant parcel that sites were within was provided as well.</p> |
| 17 | <p>State-Owned Sites: The element identifies Site #5 (Imola Avenue) as state-owned. The housing element must include a description of the County's plans, including any known barriers to development in the planning period, anticipated schedule for development including plans to sell or lease the property during the planning period and how the jurisdiction will comply with the requirements of the Surplus Land Act Article 8 (commencing with Section 54220) of Chapter 5 of Part 1 of Division 2 of Title 5.</p> | <p>The state needs to comply with the surplus land act. Include discussion on Governor's order on utilizing excess property for affordable housing. County will look to see if we can get more concrete intent from the State on their intentions with the property. Subsequent to our 11/30 meeting with HCD, HCD staff is going to be talking to DGS about what is happening on their end with the property.</p> |

18 Suitability of Nonvacant Sites: While the element identifies nonvacant sites to accommodate the regional housing need for lower-income households, it provides no description of how the potential for redevelopment. For your information, the element must analyze the entirety of a nonvacant site to identify the extent to which existing uses may impede additional residential development; this analysis cannot be limited solely to the vacant portions of a nonvacant site. The element must describe the methodology used to determine the additional development potential within the planning period. The methodology must consider factors including the extent to which existing uses may impede additional residential development, development trends, market conditions, any existing leases or other contracts that would perpetuate the existing use or prevent redevelopment of the site for additional residential development, and regulatory or other incentives or standards to encourage additional residential development on these sites. (Gov. Code, § 65583.2, subd. (g).) For sites with residential uses, the inventory could also describe structural conditions or other circumstances and trends demonstrating the redevelopment potential to more intense residential uses. For nonresidential sites, the inventory could also describe whether the use is operating, marginal or discontinued, and the condition of the structure or could describe any expressed interest in redevelopment. For additional information and sample analysis, see the Building Blocks at: <https://www.hcd.ca.gov/analysis-of-sites-and-zoning>.

Additional language was added to the Housing Element to clarify which sites in the inventory are considered vacant and nonvacant.

The following sites in the inventory have existing uses and are considered nonvacant:

- Spanish Flat Site, which consists of APN 019-261-041 and 019-261-040
- Altamura site, which consists of APN 039-320-016
- Foster Road Site, portion which consists of APN 043-062-008
- Imola Avenue Site, which consists of APN 046-450-041)

The following sites, as defined by Government Code 65863.2(c)(2)(B), are vacant and have no evidence of any structures or improvements. However, the parcel(s) that the sites are situated within have existing uses which were described in the narrative.

- Bishop Site, which consists of APN 039-320-005
- Foster Road Site, portions which consists of APN 043-102-106

The methodology used to determine the development potential of sites considered the existing uses within the sites or within the larger parcels and consisted of an evaluation of development trends, the extent to which existing uses may impede residential development, market conditions, a windshield survey, and regulatory or other incentives or standards to encourage additional residential development on these sites. Based on the evaluation of these factors, the sites in the inventory have reasonable development potential.

19 Additionally, the housing element appears to rely upon nonvacant sites to accommodate more than 50 percent of the RHNA for lower-income households. Therefore, the housing element must demonstrate that the existing use is not an impediment to additional residential development in the planning period. (Gov. Code, § 65583.2, subd. (g)(2).) Absent findings (e.g., adoption resolution) based on substantial evidence, the existing uses will be presumed to impede additional

Language was added to the Housing Element to clarify that the County has not relied upon nonvacant sites to accommodate more than 50 percent of the RHNA for lower-income households. Based on HCD definition, nonvacant sites include accessory dwelling units and vacant sites to be rezoned. For this reason, there is not only sufficient lower income unit capacity within these two project types, but the County falls well below this 50 percent threshold.

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| | <p>residential development and will not be utilized toward demonstrating adequate sites to accommodate the regional housing need allocation. HCD is not aware that the County has made the appropriate finding. Any future adoption of the housing element must include the appropriate finding as part of the adoption resolution.</p> | |
| 20 | <p>Availability of Infrastructure: The element must demonstrate sufficient existing or planned water, sewer, and other dry utilities supply capacity, including the availability and access to distribution facilities to accommodate the County’s regional housing need for the planning period. While the element provides a broad discussion of water and sewer infrastructure on pp. 248-257, it presents confounding information for many of the sites identified in the inventory. As an example, some sites include a discussion that notes water and sewer infrastructure has been damaged due to wildfires, or that future efforts must be made to secure adequate water and sewer capacity but does not identify how or when adequate water and sewer capacity will be established. The element should be revised to clarify whether such conditions impact the ability of the County to provide sufficient water and sewer capacity to accommodate the RHNA or identify a program(s) to increase capacity, as necessary. For additional information, see the Building Blocks at http://www.hcd.ca.gov/community-development/building-blocks/site-inventory-analysis/analysis-of-sites-and-zoning.shtml#environmental.</p> | <p>The Housing Element was updated to address HCD’s comment on the availability of infrastructure through a discussion of water and sewer service providers in the County, the infrastructure connection potential for each site, and EIR mitigation measures and Housing Element programs that support infrastructure connections for sites in the inventory.</p> |
| 21 | <p>Environmental Constraints: The element provides some general information on constraints such as flood risk and fire hazard severity but presents confounding information on how such hazards were analyzed for their ability to impact housing development in the current planning period. This analysis is particularly significant given that the element indicated that water and sewer infrastructure and several mobilehomes were destroyed by wildfires in the prior planning period and many public</p> | <p>Environmental constraints that could affect housing development within Napa County were identified and evaluated. Updates to the Housing Element include descriptions of environmental constraints, such as wildfire, geological hazards, flood and drought. A discussion of the Housing Element policies and programs, and statutory requirements that mitigate these environmental constraints was added to the Housing Element.</p> <p>Additionally, further clarification was provided regarding sites included in prior housing element cycles. While select parcels within the larger Spanish Flat area was identified in the 5th cycle housing element, a different set of parcels within the Spanish Flat</p> |

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| | <p>comments identified fire hazards as a constraint on sites identified in the inventory. In addition, the element should also include analysis of any other known conditions or impacts on identified sites (e.g., topological features, 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>area was identified for the 6th cycle. There are no sites from the prior cycle that have been used again in this 6th cycle.</p> |
| 22 | <p>Electronic Sites Inventory: Pursuant to Government Code section 65583.3, subdivision (b), the County must utilize standards, forms, and definitions adopted by HCD when preparing the sites inventory. Please see HCD's housing element webpage at https://www.hcd.ca.gov/housing-elements-hcd for a copy of the form and instructions. The County can reach out to HCD at sitesinventory@hcd.ca.gov for technical assistance.</p> <p>Please note, upon adoption of the housing element, the County must submit an electronic version of the sites inventory with its adopted housing element to sitesinventory@hcd.ca.gov.</p> | <p>The HCD electronic sites inventory form will be prepared for Final Housing Element.</p> |
| 23 | <p>Emergency Shelters: The element notes that emergency shelters are permitted by- right in the Industrial district (pp. 205 and 207) but must also clarify that the by-right approval process is nondiscretionary. Further, the element must list and demonstrate permit processing, development, and management standards are objective and encourage and facilitate the development of, or conversion to, emergency shelters. Lastly, the element must include analysis on proximity to services and transportation, in addition to describing whether areas within the district that may be unfit for human habitation. The element may need to add or modify programs based on the outcomes of a complete analysis.</p> | <p>Clarify discussion to confirm that approvals are non-discretionary. Add "nondiscretionary" to the language. County Staff to provide description of services and transit service proximity.</p> |

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| 24 | <p>Supportive and Transitional Housing: The element states that the County permits supportive and transitional housing in residential zones and is not subject to any special regulations that are not applicable to other similar residential structures (pg. 207). However, the element should clarify whether this includes all zones allowing residential uses, including mixed use zones and add or modify programs if necessary.</p> | <p>PUDs are mixed-use. Highly regulated by HOAs. County Staff to confirm that no additional requirements apply for Supportive and Transitional Housing in any zone where residential is allowed.</p> |
| 25 | <p>Land Use Controls: The element includes general information (pp. 209-220) relative to land use controls but did not analyze these standards as potential constraints. Specifically, the element must identify and analyze all relevant land use controls impacts as potential constraints on a variety of housing types (e.g., multifamily rental housing, mobilehomes, transitional housing). This is particularly significant for the Affordable Housing Combination District (AHCD), given that this zone has not been particularly effective or utilized for housing development beyond the requirements of the County's inclusionary program. The analysis must also evaluate the cumulative impacts of land use controls on the cost and supply of housing, including the ability to achieve maximum densities and cost and supply of housing. The analysis should also describe past or current efforts to remove identified governmental constraints. As an example, the element identifies a maximum height of 35 feet for all of its zoning districts, a potential constraint on multifamily housing development. As another example, the element notes that the R-C and R-M zones allow for multifamily but have unknown lot coverages or lot coverages of less than 50%, a potential constraint on housing. Lastly, the element did not analyze its parking requirements as potential constraints. Depending on the outcomes of a complete analysis, the element may need to modify or include programs to address or remove the identified constraints.</p> | <p>Explain that height limitation is not undue constraint, as unincorporated area does not have robust response capability for larger structures. Reference EIR where it discusses how sites don't have good ped/transit access to there needs to be provisions for cars. HCD is really looking for at least 36 ft. height limit for multifamily housing. Ask developers if they can get to 3 stories within 35 ft. limit. 50% lot coverage limit is concern for ability to accommodate multifamily development for lower-income housing. Provide analysis and discussion of parking requirements - HCD likes parking on a sliding scale corresponding to unit sizes - fewer spaces required for smaller units; HCD also views covered parking and excess guest parking as potential constraints.</p> |

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| 26 | <p>Fees and Exactions: While the element notes the County does not charge impact fees, it also mentions fees for a typical single-family development of approximately \$45,000 per unit and as a result, should list and evaluate the various fees that result in these cumulative fees for impacts on housing costs and feasibility. The element should conduct this same analysis for multifamily development.</p> | <p>Staff to work with County Building Division for a better estimate of multi-family unit fees. Building Division to put together a fee estimate for a typical multifamily development. Also looking for breakdown of single-family fees.</p> |
| 27 | <p>Local Processing and Permit Procedures: The element describes permit and processing procedures on pages 216 to 219 but additional information is required to address this finding. Specifically, the element notes that housing projects in the AHCD are subject to a conditional use permit (CUP) if they have higher densities. The element should list and analyze findings and procedures for the AHCD, including CUP approval findings for larger projects in the AHCD as potential constraints on housing supply and affordability. In addition, the element should also describe and analyze processing and approval procedures for the Planned Development (PD) district. Depending on the outcomes of that analysis, the element may need to add or modify programs as necessary.</p> | <p>County Staff to provide findings/approval process for CUPs in the Affordable Housing Combination District (AHCD) zoning designation and the process and approvals for Planned Development (PD) zoning designation. Based on what is provided staff will analyze whether the requirement of a CUP of large projects in AHCD zoning designation is a constraint on housing supply and affordability and needs to be removed. Same will be done for the PD zoning designation.</p> |
| 28 | <p>Group Homes: The element currently notes that residential care facilities serving seven or more persons are subject to a conditional use permit in the R-M zone. The element should also analyze whether these uses are allowed in other residential zones and add or modify programs to ensure zoning permits group homes objectively with approval certainty in all residential zones. Additionally, the element notes on pg. 222 that large group homes are defined as housing 13 or more persons and are subject to additional spacing requirements. Consequently, the element should evaluate the threshold and spacing requirements as potential constraints on housing for persons with disabilities.</p> | <p>Provide more information per HCD comment.</p> |

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| 29 | <p>Definition of Family: The element indicates that family is defined as “one or more persons living together under a single management conducted by one or more of the persons in the group” (pg. 223). The element should evaluate this definition as a potential constraint on housing for persons with disabilities. As an example, the phrase “...single management conducted by one or more of the persons in the group” could act as a constraint on housing for persons with disabilities if the group home is managed by a nonprofit entity.</p> | <p>Counsel is reviewing the definition of 'family' and analysis will be included in Section 8 evaluating whether the definition is a constraint. If identified as a constraint Staff will modify programs (likely Program H-5f) to include an revision of the definition in the County Code.</p> |
| 30 | <p>Reasonable Accommodation: While the element included some information on the County’s reasonable accommodation procedures (pp. 223-224), it must also analyze the approval findings in Section 18.134.030 of the Napa County Code for potential constraints on housing for persons with disabilities. As an example, the analysis should identify who approves requests, identify any fees charged by the County in processing requests, and indicate whether there is an appeals process.</p> | <p>Staff is updating this section on pages 223 & 224, to include a more thorough analysis of the application procedures and requirements of NCC 18.134.000, including approval findings in Article .030 and whether the findings could be a potential constraint.</p> |
| 31 | <p>Local Ordinances: The element includes some analysis on locally adopted ordinances including its inclusionary and growth control ordinances, but additional information is required to address this finding. Specifically, the element should discuss options or any other special requirements to its inclusionary housing program. In addition, the element should fully describe the process and implementation of the Growth Management System (GMS) and evaluate the GMS for any impacts on cost, timing, and project feasibility, especially given that the GMS does not allow for the indefinite carry-over of unused market rate housing allocations. The element should add or modify programs as appropriate based on the outcomes of this analysis.</p> | <p>Staff is providing BAE/ESA will additional information on the Growth Management System (GMS) and will make changes to that subsection of Section 8 (pgs. 225 - 226). In general the GMS has not been a constraint on housing development in the past for Napa County and is not expected to be a constraint in the future.</p> |

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| 32 | <p>To have a beneficial impact in the planning period and achieve the goals and objectives of the housing element, programs must have specific commitment and discrete timing (e.g., at least annually). Programs to be revised with discrete timing include H-2a (Affordable Housing Combination District), H-2k (Water and Sewer Infrastructure), H-4f (Mobilehome Parks). With respect to specific commitment, Program H-3g (Farmworker Housing) should commit to how the County will work to support new farmworker housing such as annual contact with nonprofit developers to identify development opportunities, annually pursuing funding and include a numeric target for the planning period.</p> | <p>Staff is providing additional specifics and timing for H-2a, H-2k, H-4f, and H-3g and plans to share draft with HCD for feedback (based on discussion in our 11/30 meeting) prior to finalizing it.</p> |
| 33 | <p>State-Owned Sites: The housing element must include a program with specific commitments and a schedule of actions for Site #5 (Imola Avenue) for the County's plans to schedule to sell or lease the property during the planning period and how the jurisdiction will comply with the Surplus Land Act Article 8 (commencing with Section 54220) of Chapter 5 of Part 1 of Division 2 of Title 5.</p> | <p>County does not own, so county would not go through SLA procedures. Based on discussion HCD would like to see a timeline of proceedings to make the site available for housing development. HCD staff (Chelsea) will check with DGS on their plans. If DGS has plans for an RFP, HCD would be supportive of the site.</p> |
| 34 | <p>Shortfall of Sites: The element describes a shortfall of sites and indicates rezoning will occur to accommodate the RHNA. While the element includes Program H-4g, it must specifically commit to acreage, allowable densities and anticipated units. In addition, if necessary, to accommodate the housing needs of lower-income households, the program should specifically commit to meeting all by right requirements pursuant to Government Code section 65583.2, subdivisions (h) and (i).</p> | <p>Review and work with HCD to provide any necessary clarifications.</p> |
| 35 | <p>Annexation: The element indicates several sites and projects are within the County's Rural Urban Limit (RUL)/Sphere of Influence (SOI) and are undergoing an annexation process. If the County must rely on annexation to accommodate its regional housing need, the element must add a program to commit to completing the annexation and to rezone other sites if annexation is not completed by a date specified in the program.</p> | <p>Follow HCD suggestion to provide procedure and timelines for annexations into water/sewer service areas except in the case of Foster Road, which is in SOI and would need to annex to City.</p> |

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| 36 | <p>As noted in Findings B4, the element requires a complete analysis of potential governmental and nongovernmental constraints. Depending upon the results of that analysis, the County may need to revise or add programs and address and remove or mitigate any identified constraints.</p> | <p>Pending review/completion of additional Govt Constraints analysis in response to HCD comments.</p> |
| 37 | <p>While the element contains Program H-4f related to mobilehome preservation, the program should be revised to include specific steps and timing commitments the County will undertake in rehabilitation and rebuilding during the current planning period and consider a higher numeric target for the planning period.</p> | <p>Considering revising Program H-4f to include commitments to outreach to MH property owners to inform them of the program, within 12 mos. of adoption. For interested property owners - technical assistance to let them know what is possible and what the requirements/procedures would be (meet within 3 month expression of interest and provide technical assistance on funds available, etc.); upon receipt of application for funds, give them a decision within 60 days; work with applicants in application process.</p> |
| 38 | <p>As noted in Finding B1, the element must include a complete analysis of AFFH. Based on the outcome of that analysis, the element must add or modify programs. 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 income areas (throughout the County), place-based strategies for community preservation and revitalization and displacement protection.</p> | <p>Pending review/completion of additional AFFH analysis in response to HCD comments.</p> |
| 39 | <p>The element must commit to monitor ADU production and affordability throughout the course of the planning period and implement additional actions if not meeting target numbers anticipated in the housing element. Monitoring should occur at least twice in the planning period. Additional actions, if necessary, should be taken in a timely manner (e.g., within 6 months). Finally, if necessary, the degree of additional actions should be in stride with the degree of the gap in production and affordability. For example, if actual production and affordability of ADUs is far from anticipated trends, then rezoning or something similar</p> | <p>Follow HCD suggestion. (Modify existing ADU program or create new monitoring program.)</p> |

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| | <p>would be an appropriate action. If actual production and affordability is near anticipated trends, then measures like outreach and marketing might be more appropriate.</p> | |
| 40 | <p>The element provides a summary of quantified objectives on page 49 for the 6th cycle planning period. For your information, conservation and rehabilitation objectives could be supplemented to reflect units conserved or rehabilitated from Programs H-1a, H-1b, and H-1c, as an example.</p> | <p>Follow HCD suggestion.</p> |
| 41 | <p>While the element includes a general summary of the public participation process (pp. 1-24; Appendix A), it must also demonstrate diligent efforts were made to involve all economic segments of the community in the development of the housing element. The element describes outreach in which focus groups with conducted with various stakeholders, in addition to interviews with Spanish speakers, but should also identify and describe additional opportunities were taken to engage with lower-income and special needs populations in the community. As an example, the element could describe efforts to conduct outreach at other public forums, such as schools, places of worship, libraries, shopping centers, parks, and at community-led events. Further, although the element summarizes public comments it received, it should also describe how they were considered and incorporated into the element. As an example, the element should identify how it considered and incorporated comments received regarding mobilehome parks and multi-generational housing in its goals, actions, and programs.</p> | <p>The Housing Element has been updated to include a section describing inclusive outreach efforts made to involve a wide spectrum of the community. The added section includes a summary of the Equity Working Group, targeted engagement with stakeholders from underrepresented and low-income populations, translation services provided at various Housing Element outreach meetings, staff discussions with community members, and the resources that were provided on the Housing Element website.</p> <p>Additional language was provided to augment the summary of comments provided against the August 2022 Draft Housing Element and how the input was considered and impacted updates to the Housing Element.</p> |
| 42 | <p>While the element describes how General Plan consistency was achieved (pg. 24), it must also identify how it will be maintained during the planning period. For example, to maintain internal consistency, the element could include a program to conduct an internal consistency review of the general plan as part of the annual general plan implementation report required by Government Code section 65400. The</p> | <p>Add program for internal consistency review, state that County does this each year with APR and General Plan implementation report, identify any inconsistencies and identify changes to achieve consistency, including possible need to update Land Use Element to reflect rezoning actions.</p> |

annual report can also assist future updates of the housing element. For additional information and a sample program, see the Building Blocks at <http://www.hcd.ca.gov/community-development/building-blocks/otherrequirements/analysis-consistency-general-plan.shtml>.