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**RHNA Allocations Memorandum
from CDPD Director**



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Hillary Gitelman
Director

MEMORANDUM

To: Planning Commissioners	From: Hillary Gitelman 
Date: March 16, 2012	Re: RHNA Allocations & Napa Pipe

I wanted to provide a brief explanation related to two recent items in the Napa Register about the Regional Housing Needs Allocation (RHNA) process, which is the State requirement that we provide sites for multifamily housing. (Both items are attached.)

First, on March 14, 2012, there was a letter to the editor by Harold Kelly suggesting that any residential development at the Napa Pipe site would constitute "sprawl." He also suggested that the site should stay in industrial use, that it should be used for City and County equipment yards, and that the County could meet its housing requirements by using a temporary "overlay zone" on 20 acres of the site. In Mr. Kelly's view, this "overlay zone" would be removed once other jurisdictions in the County agree to accept the County's housing requirements via the "sub-regional" planning process that is currently underway.

There are several problems with Mr. Kelly's suggestion regarding use of a temporary overlay zone. One of these is that the County has already committed in its housing element to rezone at least 20 acres of the Napa Pipe site (for at least 304 units, with 202 by right), and fulfilling this commitment cannot be achieved via an "overlay zone." This is because State law (Government Code Section 65583.2(h)) requires that half of the units be on sites that are zoned solely for residences, where mixed uses and non-residential uses are not permitted. This requirement would be met by any of the three alternatives that have been presented to the Commission, but would not be met if an "overlay zone" similar to those in place in Angwin, Moskowitz Corners, etc. is used.¹

Second, on March 16, 2012, a Napa Register article described recent communications from ABAG suggesting a higher than anticipated RHNA allocation for the County for the 2014-2022 housing cycle. The reporter's description is accurate: we received word last week of a possible allocation of 740 units, rather than the 250-300 we were expecting, and ABAG staff assures us that there is a technical correction to their modeling that will bring the numbers back down within the next several weeks.

¹ In the 20 acre alternative put forward by staff, the RM zoning would allow neighborhood serving retail uses, but only in conjunction with multifamily housing (not instead of multifamily housing).

Please don't hesitate to ask for clarification on either of these issues at our hearing on Monday.

cc. Sean Trippi/File



At any size, Napa Pipe development represents dreaded urban sprawl

HAROLD R. KELLY | Posted: Wednesday, March 14, 2012 12:00 am

The Napa County Planning Commission will be holding a public hearing on the Napa Pipe rezoning from an industrial zone to an urban sprawl zone in the county outside of, but next to, the city of Napa. The developer of Napa Pipe is proposing a development larger than our upper valley cities in the county next to the city of Napa. This is urban sprawl. The public hearing is Monday, March 19, at the Napa College Little Theater.

This Napa Pipe saga has been a long process, but nothing has changed since the time the developers made a speculative purchase of Napa Pipe and have spent a lot of money trying to convince you that their proposal makes sense. After a lot of effort and some small modifications to the proposal, plus an environmental impact report, the developers project remains urban sprawl with high traffic, lack of water, sewer issues, lack of city police and fire services, schools, flooding, and many other urban sprawl problems.

The county planning staff, in order to mollify the developer, has proposed a reduced plan of urban sprawl, putting it all on the river side of the railroad and leaving some land as industrial. This reduced plan does not change any of the urban sprawl environmental issues except to reduce traffic volumes and this plan should also be rejected.

The Napa County planning staff has for some time been concerned about the need for additional low-cost housing zoning in the county as required by the state Regional Housing Needs Allocations (RHNA). The Association of Bay Area Governments has recognized sub-regional allocations for the previous state RHNA requirements. Our county and its cities are in the process of making new housing allocations so that Napa County will not be required to make any expanded housing zoning sites outside of the cities. This will solve this false planning concern. Now, we do not need to create urban sprawl to meet a state mandate.

The Board of Supervisors, in trying to meet the state RHNA requirements, has suggested that a 20-acre parcel of the Napa Pipe industrial zone be rezoned to residential to satisfy the state. Even that zoning does not need to be done at this time as the board could do a temporary "overlay zone" on the 20 acres, if needed, until all of the new sub-regional housing allocations have been approved by the state and then remove it. The loss of any industrial zoned land adjacent to the city of Napa is poor planning. Napa County's present plan for helping low-income buyers purchase some of the existing homes now on the market in Napa is an excellent local answer to this issue.

This industrial site would be an excellent place for the county of Napa and the city of Napa to cooperatively place their current equipment yards making existing used land available for future sub-regional residential development within the city boundaries where urban services already exist. The Napa Pipe land should remain industrial zoning for use of future industrial job creators, for the purpose of creating long-term employment near existing city residential housing.

My position has always been if this developer seriously wanted to create a good development on this land, he would have proposed it to the city of Napa and tried to convince the city voters that he needed to be annexed to the city of Napa to avoid urban sprawl to obtain the water, sewer, police, fire and schools needed for a development of this size, plus work out better solutions to the traffic being created. He has proposed this project in the county because he believed at that time that he could force it on the county due to state RHNA requirements and the fact that the county does not have experience in urban development, so he could get away with a lot more. As concerned people, now is the time to let the County Planning Commission know that this not an appropriate project for this large tract of land next to the city of Napa. Let your voice be heard at the public hearing Monday, March 19.

(Harold R. Kelly is a former Napa County Planning Commissioner and former Napa City Council member.)



Wrong housing numbers 'shock' officials

PETER JENSEN | Posted: Friday, March 16, 2012 12:00 am

Napa County officials received a scare last week when their housing allocation from the Association of Bay Area Governments jumped dramatically.

Instead of the expected 125 to 270 housing units in the unincorporated areas for 2014-2022, ABAG assigned the county 740 residences.

"Suddenly our allocation went up," said Larry Florin, director of the county's Housing and Intergovernmental Affairs Department. "It was a complete shock to everyone involved."

An allocation of 740 units could have undermined the latest county recommendation that a developer's plans for housing at Napa Pipe be significantly reduced.

As it turned out, ABAG's future numbers for the county and its five cities were in error.

It proved to be a false alarm, county Supervisor Mark Luce said Thursday.

Luce, president of ABAG's executive board, said an agency director had confirmed that the county's most recent projection was based on an error in the data calculation. It should have been a more manageable figure of about 370 units, he said.

"That number is very manageable," he said. "The other number would have pressed us."

ABAG Associate Planner Danielle Schmitz said agency staff is going over all of the analysis to check for errors in the cities' projections.

"Nobody really knows how they came up with these numbers right now," Schmitz said. "They don't make sense. In all of the iterations so far, the numbers have been much lower."

For almost a year, local officials were anticipating a drop in the county's regional housing allocation, which ABAG assigns to each of the Napa Valley's five cities and the unincorporated area to meet housing requirements from the state. In the last allocation cycle, from 2007-2014, the county received an allocation of 651 units for its unincorporated area.

Projections by ABAG staff last year put the county's allocation for the next cycle, from 2014 to 2022, at between 125 to 270 units, Florin said.

In the last several months, county officials spoke of an understanding with ABAG that the county's allocation needed to drop to reduce development pressures.

Planning Director Hillary Gitelman cited that expectation in advocating for a reduction in the size of the Napa Pipe project, from the 2,050 residential units proposed by its developers to the 700 to 945 units backed by planning staff.

In last week's allocations, which are being recalculated, here are the numbers:

- The city of Napa — up from the expected 500 units to 1,200;
- St. Helena — from 30 to 111
- Calistoga — from 26 to 75
- Yountville — from 19-24 to 55.

ABAG has plenty of time to correct itself. The final regional housing allocations won't be adopted until May 2013.

The county has had trouble meeting its allocations in the past. The state refused to certify the county's housing plan in 2009, leading to a lawsuit by affordable-housing advocacy group Latinos Unidos del Valle de Napa y Solano. The county prevailed in that suit.

This story has been altered since its original posting to correct a date.